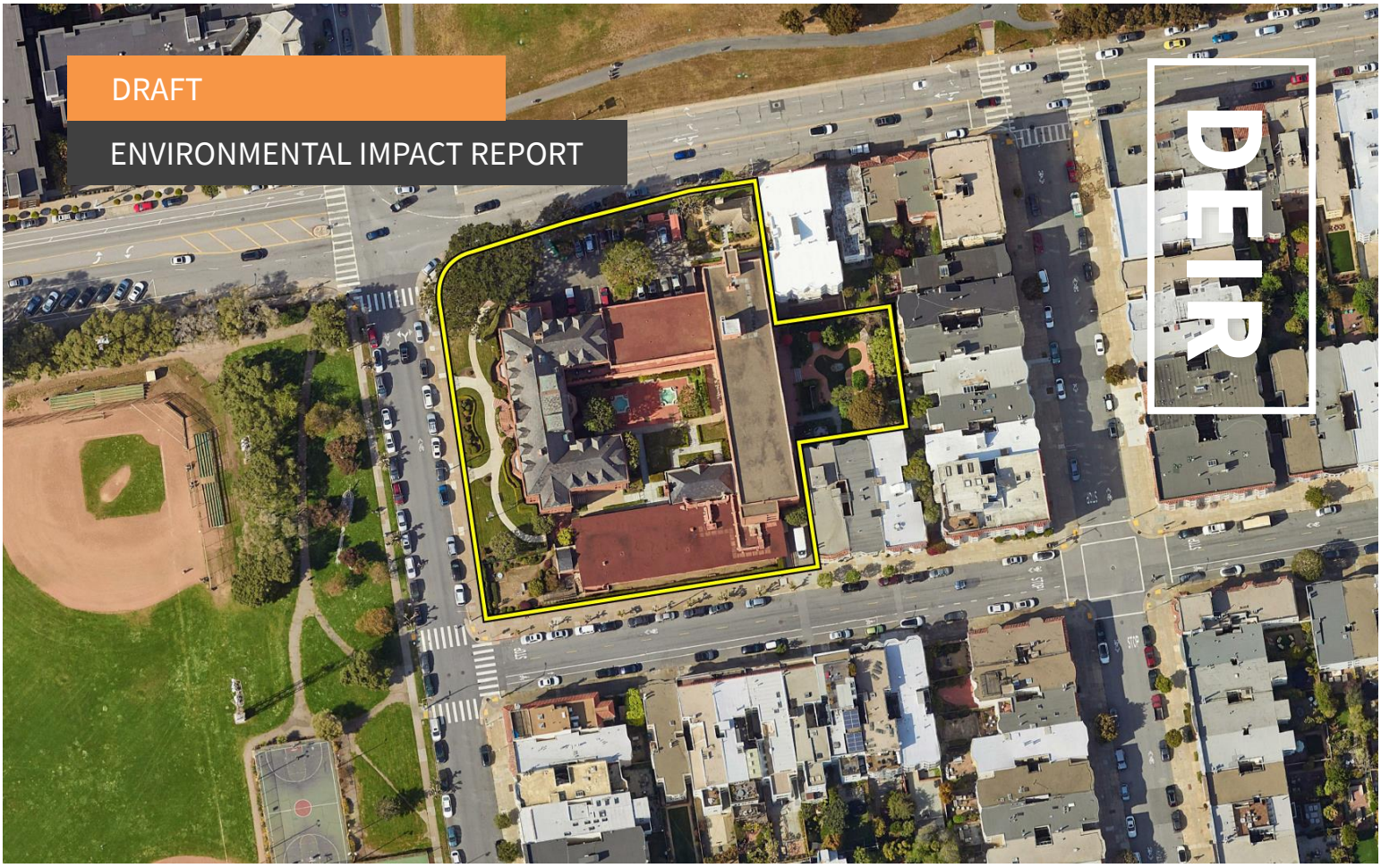

3400 Laguna Street Project

San Francisco Planning
Case No. **2022-009819ENV**

State Clearinghouse No. 2024050241

Public Draft EIR	*Draft EIR Publication Date:*	August 28, 2024
	Draft EIR Public Hearing Date:	September 26, 2024
	Draft EIR Public Comment Period:	August 28, 2024–October 15, 2024

Written comments should be sent to:

Megan Calpin
Environmental Coordinator
49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103
or CPC.3400LagunaEIR@sfgov.org

San Francisco Planning

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TABLE OF CONTENTS

APPENDICES

FIGURES

TABLES

LIST OF ABBREVIATIONS AND ACRONYMS

$\mu g/m^3$	micrograms per cubic meter
2020 Citywide HRA	Citywide Health Risk Assessment
ADA	Americans with Disabilities Act
air basin	San Francisco Bay Area air basin
air board	California Air Resources Board
air district	Bay Area Air Quality Management District
APEZ	Air Pollutant Exposure Zone
AQI	Air Quality Index
CalEEMod	California Emissions Estimator Model
California Register	California Register of Historical Resources
CAPCOA	California Air Pollution Control Officers Association
CEQA	California Environmental Quality Act
chronic HI	chronic hazard index
City	City of San Francisco
CO	carbon monoxide
COVID-19	novel coronavirus 2019 disease
DPM	diesel particulate matter
draft EIR	draft environmental impact report
GHG	greenhouse gas
HARP2	Hot Spots Analysis and Reporting Program
HPC	San Francisco Historic Preservation Commission
HRA	health risk assessment
HRE	Historic Resource Evaluation
HRR	Historic Resource Review
NAAQS	National Ambient Air Quality Standards
National Register	National Register of Historic Places
NO_2	nitrogen dioxide
NOA	Notice of Availability
NOP	Notice of Preparation
NO_X	nitrogen oxides

OEHHA	Office of Environmental Health Hazard Assessment
planning commission	San Francisco Planning Commission
planning department	San Francisco Planning Department
PM	particulate matter
PM_{10}	particulate matter of 10 microns in diameter or less
$PM_{2.5}$	particulate matter of 2.5 microns in diameter or less
proposed project	3400 Laguna Street Project
RH-3	Residential-House, Three Family
RM-1	Residential-Mixed, Low Density
RM-2	Residential-Mixed, Moderate Density
RM-4	Residential-Mixed, High Density
ROG	reactive organic gases
SFPUC	San Francisco Public Utilities Commission
SO_2	sulfur dioxide
Society	San Francisco Ladies' Protection and Relief Society
TACs	toxic air contaminants
U.S. EPA	United States Environmental Protection Agency
VOCs	volatile organic compounds

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SUMMARY

S.1 Introduction

This document is a draft environmental impact report (draft EIR) for the proposed 3400 Laguna Street Project (proposed project). This chapter of the draft EIR provides a summary of the proposed project, a summary of anticipated environmental impacts of the proposed project and identified mitigation measures, a summary of alternatives including identification of the environmentally superior alternative, and areas of controversy and issues to be resolved.

S.1.1 Project Summary

The proposed project is located on an approximately 68,090-square-foot (approximately 1.6-acre) site at 3400 Laguna Street on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The project site is within the RM-1 (Residential-Mixed, Low Density) Zoning District, and a 40-X Height and Bulk District. Most of the properties in the immediate vicinity are designated as RM-1, RM-2 (Residential-Mixed, Moderate Density), RH-3 (Residential-House, Three Family), and RM-4 (Residential-Mixed, High Density).

The project site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The project site has been occupied by the Heritage on the Marina residential care retirement community since 1925. Heritage on the Marina consists of five existing structures of approximately 83,200 gross square feet: the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretakers Cottage.

The proposed project would demolish two of the five existing buildings (the Perry Building Connector and the Health Center) and construct two new buildings (the Bay Building and the Francisco Building) of heights not to exceed 40 feet and in the same locations as the demolished structures. The existing Julia Morgan and Perry buildings would be interconnected to the two new buildings, similar to the existing building's configuration. The proposed project would renovate the Julia Morgan and Perry buildings. In total, the proposed project would add approximately 58,380 square feet of net new institutional use for a total of 141,580 square feet and increase the number of residential care suites by 23, from 86 to 109. The proposed project would continue to operate as a residential care facility.

Project construction would last approximately 29 months and is currently anticipated to occur between January 2027 and June 2029.

Table S-1, Project Summary, summarizes the characteristics of the proposed project.

Table S-1 Project Summary

	Existing	Proposed	Net Change
Number of Building(s)	5	5	0
Maximum Building Stories[1]	4	4	0
Maximum Building Height (feet)[1]	41	41	0
Building Gross Square Feet	83,200	141,580	+58,380
Residential Care Suites	86	109	+23
Useable Open Space (gross square feet)	26,410	30,280	+3,870
Off-Street Parking (spaces)	17	36	+19
Off-Street Loading Spaces	2	1	-1
On-Street Parking Spaces[2]	28	20	-8
On-Street Commercial Loading Spaces	0	0	0
On-Street Passenger Loading Spaces	3	2	-1

Source: HKS Inc. and Kimley-Horn, Project Plans (January 10, 2024).
Notes: All gross square footage numbers are rounded to the nearest multiple of 10.

[1] Reflects the maximum building height and number of stories; existing buildings vary across the site. The existing Perry Building is 40.5 feet tall (rounded to 41 feet tall) and no changes to this building's height are proposed. The new Bay and Francisco building heights would not exceed 40 feet.

[2] Reduction in parking due to bulb-outs required by planning code section 138.1. In addition, one on-street parking space on Bay Street would be removed for the project's new driveway; however, one on-street parking space would be added on Francisco Street because the proposed project would eliminate the existing 22-foot passenger loading space on Francisco Street.

S.2 Summary of Impacts and Mitigation Measures

This EIR analyzes the potential environmental effects of the proposed project. The initial study (Appendix B) determined that the proposed project would have no impact on the following environmental topics or that the topics are not applicable: aesthetics, parking, agriculture and forestry resources, mineral resources, and wildfire (see initial study Section E.1, No Impact or Not Applicable Topics). As a result, the initial study did not discuss these topics further, except to briefly describe why the proposed project would have no impact on these topics or why they are not applicable to the proposed project.

The following topics were analyzed at greater detail in the initial study (the corresponding sections for each relevant resource topic are included):

- Section E.2, Land Use and Planning
- Section E.3, Population and Housing
- Section E.4, Cultural Resources
- Section E.5, Tribal Cultural Resources

- Section E.6, Transportation and Circulation
- Section E.7, Noise
- Section E.8, Air Quality
- Section E.9, Greenhouse Gas Emissions
- Section E.10, Wind
- Section E.11, Shadow
- Section E.12, Recreation
- Section E.13, Utilities and Service Systems
- Section E.14, Public Services
- Section E.15, Biological Resources
- Section E.16, Geology and Soils
- Section E.17, Hydrology and Water Quality
- Section E.18, Hazards and Hazardous Materials
- Section E.19, Energy

Refer to the Initial Study in Appendix B for discussion and the impact analysis of the proposed project with respect to these resource topics.

S.3 EIR Topics

The initial study found that the proposed project may have a significant impact to cultural (architectural) resources and air quality. These resource areas require further analysis and are therefore discussed in this draft EIR. The environmental analysis for these topics is presented in Chapter 3, Environmental Setting, Impacts and Mitigation Measures of this draft EIR.

Table S-2, Summary of Impacts of the 3400 Laguna Street Project Identified in the EIR identifies the impacts and mitigation measures for the proposed project that are identified in this draft EIR. **Table S-3, Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study** identifies the impacts and mitigation measures for the proposed project that are identified in the initial study (included as Appendix B). The information in the tables is organized to correspond with environmental issues discussed in Chapter 3 of this draft EIR and the initial study (Appendix B). The table is arranged in four columns: (1) impacts; (2) level of significance prior to mitigation measures (if applicable); (3) mitigation measures (if applicable); and (4) level of significance after mitigation (if applicable).

Table S-2 Summary of Impacts of the 3400 Laguna Street Project Identified in the EIR

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
EIR Section 3.B, Historic Resources			
Impact CR-1: The proposed project may cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code.	S	**Mitigation Measure M-CR-1: Best Practices and Construction Monitoring Program for Historic Resources** Prior to the start of construction activities, the project sponsor shall submit to the planning department preservation staff for review and approval, a list of measures to be included in contract specifications to avoid accidental damage to historic resources. The measures can include, but are not limited to, staging of equipment and materials so as to avoid direct damage; maintaining a buffer zone, when possible, between heavy equipment and historic resources; and, when applicable, covering the roof of adjacent structures to avoid damage from falling objects. Specifications shall also stipulate that any damage incurred to historic resources from construction activities shall be immediately reported to the ERO. If directed by planning department preservation staff, the project sponsor shall engage a qualified preservation professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61), to undertake a monitoring program to ensure that best practices are being followed. If monitoring is required, the qualified preservation professional shall prepare a monitoring plan to direct the monitoring	LTSM

Table S-2 Summary of Impacts of the 3400 Laguna Street Project Identified in the EIR

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		program that shall be reviewed and approved by planning department preservation staff. Damage incurred to the historic resource shall be repaired to match pre-construction conditions per the Secretary of the Interior's Standards for the Treatment of Historic Properties in consultation with the qualified professional and planning department preservation staff.	
Impact C-CR-1: The proposed project, in combination with cumulative projects, would not cause a substantial adverse change in the significance of a historical resource.	LTS	No mitigation is required.	NA
EIR Section 3.C, Air Quality			
Impact AQ-2: The proposed project's construction activities would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin.	LTS	No mitigation is required.	NA
Impact AQ-4: The proposed project would expose sensitive receptors to substantial pollutant concentrations.	S	**Mitigation Measure M-AQ-4: Off-Road Construction Equipment Requirements.** The project sponsor shall comply with the following: A. **Engine Requirements** 1. All off-road diesel-powered construction equipment of 25 horsepower or more used for project construction shall have engines that meet or exceed the California Air Resources Board Tier 4 Final emissions standards.	LTSM

Table S-2 Summary of Impacts of the 3400 Laguna Street Project Identified in the EIR

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		2. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions and safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, Tagalog, and Chinese in designated queuing areas and at the construction site to remind operators of the two-minute idling limit. 3. The project sponsor shall instruct construction workers and equipment operators in the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications. B. **Construction Emissions Minimization Plan.** Before starting onsite construction activities, the contractor shall submit a construction emissions minimization plan (plan) to the ERO or the ERO's designee for review and approval. The plan shall state, in reasonable detail, how the contractor will meet the engine requirements of section A. 1. The plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction	

Table S-2 Summary of Impacts of the 3400 Laguna Street Project Identified in the EIR

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		phase. The description may include but is not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, engine serial number, and expected fuel use and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used. 2. The project sponsor shall ensure that all applicable requirements of the plan have been incorporated into the contract specifications. The plan shall include a certification statement that the project sponsor agrees to comply fully with the plan. 3. The project sponsor shall make the plan available to the public for review on site during working hours. The project sponsor shall post at the construction site a legible and visible sign summarizing the plan. The sign shall also state that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. The project sponsor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way. C. **Monitoring.** After the start of construction activities, the contractor shall submit reports every	

Table S-2 Summary of Impacts of the 3400 Laguna Street Project Identified in the EIR

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		six months to the ERO or the ERO's designee, documenting compliance with the plan. After completion of construction activities and prior to receiving a certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the plan.	
Impact C-AQ-4 Construction of the proposed project, in combination with cumulative projects, would expose sensitive receptors to substantial pollutant concentrations.	S	Implement Mitigation Measure M-AQ-4 as detailed above for Impact AQ-4.	LTSM

Source: Compiled by LSA (2024).
Impact Codes:
S = Significant
LTS = Less Than Significant
LTSM = Less Than Significant with Mitigation
NA = Not Applicable

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Initial Study Section E.2, Land Use and Planning (See Appendix B)			
Impact LU-1: The proposed project would not physically divide an established community.	LTS	No mitigation required.	NA
Impact LU-2: The proposed project would not cause a significant physical environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.	NI	No mitigation required.	NA
Impact C-LU-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to land use and planning.	NI	No mitigation required.	NA
Initial Study Section E.3, Population and Housing (See Appendix B)			
Impact PH-1: The proposed project would not induce substantial unplanned population growth, either directly or indirectly.	LTS	No mitigation required.	NA
Impact PH-2: The proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing.	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact C-PH-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to population and housing.	LTS	No mitigation required.	NA
Initial Study Section E.4, Cultural Resources (See Appendix B)			
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archeological resource.	S	**Mitigation Measure M-CR-2: Archeological Monitoring** **Archeological Monitoring Program.** The purpose of the archeological monitoring program will be to observe soil disturbing construction activities in order to determine if significant archeological resources are present at the project site and to ensure significant archeological resources are appropriately protected or treated. The project sponsor shall retain the services of an archeological consultant from the rotational Qualified Archeological Consultants List (QACL) maintained by the planning department. After the first project approval action or as directed by the Environmental Review Officer (ERO), the project sponsor shall contact the department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological monitoring program as specified herein. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for	LTSM

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		review and comment and shall be considered draft reports subject to revision until final approval by the ERO. In addition, the consultant shall be available to conduct a data recovery program if required pursuant to this measure. Archeological data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c). **Archeological Monitoring Plan.** The archeological monitoring program shall be conducted in accordance with the approved Archeological Monitoring Plan (AMP). The archeological consultant, Native American representatives, and the ERO shall consult on the scope of the AMP, which shall be approved by the ERO prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archaeologist and Native American representatives shall determine what project soils disturbing activities shall be archeologically monitored. The AMP shall be submitted first and directly to the ERO for review and comment and shall be considered a draft subject to revision until final approval by the ERO. The archaeologist shall implement the monitoring as specified in the approved AMP during construction. The archeological and Native American monitors shall be	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		present on the project site according to a schedule agreed upon by the archeological consultant, Native American representative, and the ERO until the ERO has determined that project construction activities could have no effects on significant archeological deposits. The AMP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, lay out what scientific/ historical research questions are applicable to the expected resource, Native American cultural significance of the expected resources, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. **Archeological and Cultural Sensitivity Training.** The archeological consultant and local Native American representative shall provide a training to the prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils-disturbing activities within the project site. The training shall advise all project contractors to be on the alert for evidence of the presence of the expected archeological resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource by the construction crew. The Native American representative at their discretion shall provide a Native American cultural sensitivity training.	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Collection During Archeological Monitoring. The monitor is authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. Ecofacts are biological or geological objects or deposits related to human activity, but not manufactured by humans. Examples of ecofactual materials include animal bones, charcoal, plants, and pollen that can tell us about past diet or environments. **Paleoenvironmental Analysis of Paleosols.** When a submerged paleosol is identified during monitoring, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction. The results of analysis of collected samples shall be reported on in results reports. **Discovery Treatment Determination.** If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant in coordination with the Native American monitor shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		archeological deposit, present the findings of this assessment to the ERO. If the ERO in consultation with the archeological consultant and Native American monitor determines that a significant archeological resource or tribal cultural resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource and the archeological consultant shall prepare an archeological resource preservation plan, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft preservation plan to the planning department for review and approval. If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible. **Consultation with Descendant Communities.** On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. The representative of the descendant group at their request may provide a cultural sensitivity training to soil-disturbing construction contractors. The ERO and project sponsor shall work with the tribal representative or other representatives of descendant communities to identify the scope of work to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Representatives shall be compensated for their work as identified in the agreed upon scope of work. A copy of the Archeological Resources Report (ARR) (described further below) shall be provided to the representative of the descendant group. **Archeological Data Recovery Plan.** An archeological data recovery program shall be conducted in accordance with an Archeological Data Recovery Plan (ADRP) if all three of the following apply: 1) a resource has potential to be significant, 2) preservation in place is not feasible, and 3) the ERO determines that an archeological data recovery program is warranted. The project archeological consultant, local Native American representative, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant in coordination with the Native American representative shall prepare a draft	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain and will coordinate with Native American representative(s) to ensure that cultural values are addressed. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical or if the Native American representative does not approve of destructive methods. The scope of the ADRP shall include the following elements: • **Field Methods and Procedures.** Descriptions of proposed field strategies, procedures, and operations. • **Cataloguing and Laboratory Analysis.** Description of selected cataloguing system and artifact analysis procedures.	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• **Discard and Deaccession Policy.** Description of and rationale for field and post-field discard and deaccession policies. • **Security Measures.** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities. • **Final Report.** Description of proposed report format and distribution of results. • **Curation.** Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities. **Cultural Resources Public Interpretation Plan.** The project archeological consultant shall submit a Cultural Resources Public Interpretation Plan (CRPIP) if a significant archeological resource is discovered during a project. As directed by the ERO, a qualified design professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, local artists, or community group may also be required to assist the project archeological consultant in preparation of the CRPIP. If the resource to be interpreted is a tribal cultural resource, the CRPIP shall be prepared in consultation with and developed with the participation of local Native American tribal representatives. The CRPIP shall	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The CRPIP shall be sent to the ERO for review and approval. The CRPIP shall be implemented prior to occupancy of the project. **Human Remains and Funerary Objects.** The treatment of human remains and funerary objects discovered during any soil-disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Office of the Chief Medical Examiner of the City and County of San Francisco (Medical Examiner). The ERO also shall be notified immediately upon the discovery of human remains. In the event of the Medical Examiner's determination that the human remains are Native American remains, the Medical Examiner shall notify the California State Native American Heritage Commission (NAHC), which will appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98(a)). The landowner may consult with the project archeologist and project sponsor and shall consult with the MLD and ERO on preservation in place or recovery of the remains and any scientific treatment alternatives. The landowner shall then make all reasonable efforts to develop an Agreement with the MLD, as expeditiously as	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). Per Public Resources Code 5097.98 (b)(1), the Agreement shall address and take into consideration, as applicable and to the degree consistent with the wishes of the MLD, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses unless otherwise specified in the Agreement, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement. Both parties are expected to make a concerted and good faith effort to arrive at an Agreement, consistent with the provisions of Public Resources Code 5097.98. However, if the landowner and the MLD are unable to reach an Agreement, the landowner, ERO, and project sponsor shall ensure that the remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance, consistent with state law. Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity, additionally, shall	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		follow protocols laid out in the project's archeological treatment documents, and in any related agreement established between the Medical Examiner and the ERO. The project archeologist shall retain custody of the remains and associated materials while any scientific study scoped in the treatment document is conducted and the remains shall then be curated or respectfully reinterred by arrangement on a case-by case-basis. **Archeological Resources Report.** Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO. The archeological consultant shall submit a draft Archeological Resources Report (ARR) to the ERO that evaluates the historical significance of any discovered archeological resource, describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix. Once approved by the ERO, copies of the ARR shall be distributed as follows: California Historical Resources Information System, Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the approved ARR to the NWIC. The environmental planning division of the planning department shall receive one (1) bound hard copy of the ARR. Digital files that shall be submitted to	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		the environmental planning division include an unlocked, searchable PDF version of the ARR, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF ARR, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archeological treatment, a PDF of the ARR shall be provided to the representative of the descendant group. **Curation.** Significant archeological collections and paleoenvironmental samples of future research value shall be permanently curated at an established curatorial facility or Native American cultural material shall be returned to local Native American tribal representatives at their discretion. The facility shall be selected in consultation with the ERO. Upon submittal of the collection for curation the sponsor or archaeologist shall provide a copy of the signed curatorial agreement to the ERO.	
Impact CR-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries.	S	Implement Mitigation Measure M-CR-2 as detailed above for Impact CR-2.	LTSM

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact C-CR-2: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to archeological resources or human remains.	LTS	No mitigation required.	NA
Initial Study Section E.5, Tribal Cultural Resources (See Appendix B)			
Impact TC-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.	S	**Mitigation Measure M-TC-1: Tribal Cultural Resources Program** **Preservation in Place.** In the event of the discovery of a tribal cultural resource, the Environmental Review Officer (ERO), the project sponsor, and the tribal representative shall consult to determine whether preservation in place would be feasible and effective. Coordination shall take place with local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, then the project sponsor in consultation with local Native American representatives and the ERO shall prepare a tribal cultural resource preservation plan (TCRPP). If the tribal cultural resource is an archeological resource of Native American origin, the archeological consultant shall prepare an archeological resource preservation plan (ARPP) in consultation with the local Native American representative, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft ARPP to the planning department for review and approval.	LTSM

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Public Interpretation Land Acknowledgement. The project sponsor shall, in consultation with local Native American representatives, design and install public interpretation at the project site acknowledging that this project is built on traditional Ohlone land. The interpretive program may include a combination of artwork, preferably by local Native American artists, educational panels or other informational displays or interpretative elements. Within a reasonable timeframe, the project sponsor shall prepare an interpretation plan in consultation with affiliated local Native American representatives and the ERO to guide the acknowledgment program. The plan shall identify, as appropriate, the proposed location for the acknowledgement, the proposed content and materials, the producers or artists, and a long-term maintenance program. If Native American cultural resources are found during Project construction, interpretation of these resources may be included in the interpretative program in consultation with the local Native American representatives and the ERO. The detailed content, media, and other characteristics of such an interpretive program shall be coordinated and approved by the local Native American representatives and the ERO. The final components of the public interpretation program shall be constructed and an agreed upon schedule for their installation and a plan for their maintenance shall be finalized prior to issuance of a Temporary Certificate of Occupancy. Tribal	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		representatives shall be compensated for their work as identified in the agreed upon scope of work.	
Impact C-TC-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on tribal cultural resources.	LTS	No mitigation required.	NA
Initial Study Section E.6, Transportation and Circulation (See Appendix B)			
Impact TR-1: The proposed project would not involve construction that would require a substantially extended duration or intensive activity that would create potentially hazardous conditions, interfere with emergency access or accessibility, or substantially delay public transit.	LTS	No mitigation required.	NA
Impact TR-2: The proposed project would not create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations.	LTS	No mitigation required.	NA
Impact TR-3: The proposed project would not interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access.	LTS	No mitigation required.	NA
Impact TR-4: The proposed project would not substantially delay public transit.	LTS	No mitigation required.	NA
Impact TR-5: The proposed project would not cause substantial additional vehicle	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas or by adding new roadways to the network.			
Impact TR-6: The proposed project would not result in a loading deficit.	LTS	No mitigation required.	NA
Impact C-TR-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on transportation and circulation.	LTS	No mitigation required.	NA
Initial Study Section E.7, Noise (See Appendix B)			
Impact NO-1: The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the proposed project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	LTS	No mitigation required.	NA
Impact NO-2: The proposed project would generate excessive groundborne vibration or groundborne noise levels.	S	**Mitigation Measure M-NO-1: Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction** Prior to issuance of a Pre-Construction Environmental Compliance letter, the project sponsor shall submit a project specific Pre-construction Survey and Vibration Management and Monitoring Plan to the ERO or the ERO's designee for approval. The plan shall identify all feasible means to avoid damage to potentially affected	LTSM

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		buildings on the project site. The potentially affected buildings on site include the Julia Morgan Building, the Perry Building, and the Caretaker's Cottage. The project sponsor shall ensure that the following requirements of the Pre-Construction Survey and Vibration Management and Monitoring Plan are included in contract specifications, as necessary. **Pre-construction Survey.** Prior to the start of any ground-disturbing activity, the project sponsor shall engage a consultant to undertake a pre-construction survey of the on-site potentially affected buildings. For the Perry Building, which is not a historic resource, a structural engineer or other professional with similar qualifications shall document and photograph the existing conditions of the building. The project sponsor shall submit the survey to the ERO or the officer's designee for review and approval prior to the start of vibration-generating construction activity. For the Julia Morgan Building and the Caretaker's Cottage, which are historic, the project sponsor shall engage a qualified historic preservation professional and a structural engineer or other professional with similar qualifications to undertake a pre-construction survey of the historic buildings. The pre-construction survey shall include descriptions and photograph of all identified historic buildings including all façades, roofs, and details of the character-defining features that could be damaged during construction, and shall document existing damage, such as cracks and loose or damaged features. The report shall also include pre-construction	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		drawings that record the pre-construction condition of the buildings and identify cracks and other features to be monitored during construction. The qualified historic preservation professional shall be the lead author of the pre-construction survey. The pre-construction survey shall be submitted to the ERO for review and approval prior to the start of vibration-generating construction activity. **Vibration Management and Monitoring Plan.** The project sponsor shall undertake a monitoring plan to avoid or reduce project-related construction vibration damage to potentially affected buildings and/or structures and to ensure that any such damage is documented and repaired. Prior to issuance of a Pre-Construction Environmental Compliance Letter, the project sponsor shall submit the Plan to the ERO for review and approval. The Vibration Management and Monitoring Plan shall include, at a minimum, the following components, as applicable: • **Maximum Vibration Level.** Based on the anticipated construction and condition of the affected buildings and/or structures, a qualified acoustical/vibration consultant in coordination with a structural engineer (or professional with similar qualifications) and, in the case of potentially affected historic buildings/structures, a qualified historic preservation professional, shall establish a maximum vibration level that shall not be exceeded at each building/structure, based on existing	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		conditions, character-defining features, soil conditions, and anticipated construction practices (common standards are a peak particle velocity [PPV] of 0.25 inch per second for historic and some old buildings, a PPV of 0.3 inch per second for older residential structures, and a PPV of 0.5 inch per second for new residential structures and modern industrial/commercial buildings). • **Vibration-generating Equipment.** The plan shall identify all vibration-generating equipment to be used during construction (including, but not limited to: site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction). • **Alternative Construction Equipment and Techniques.** The plan shall identify potential alternative equipment and techniques that could be implemented if construction vibration levels are observed in excess of the established standard (e.g., smaller, lighter equipment could be used in some cases). • **Buffer Distances.** The plan shall identify buffer distances to be maintained based on vibration levels and site constraints between the operation of vibration-generating construction equipment and the potentially affected buildings and/or structures to avoid damage to the extent possible.	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• **Vibration Monitoring.** The plan shall identify the method and equipment for vibration monitoring to ensure that construction vibration levels do not exceed the established standards identified in the plan. ○ Should construction vibration levels be observed in excess of the standards established in the plan, the contractor(s) shall halt construction and put alternative construction techniques identified in the plan into practice, to the extent feasible. ○ The qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures) shall inspect each affected building and/or structure in the event the construction activities exceed the vibration levels identified in the plan. ○ The structural engineer and/or historic preservation professional shall submit monthly reports to the ERO during vibration-inducing activity periods that identify and summarize any vibration level exceedances and describe the actions taken to reduce vibration. ○ If vibration has damaged nearby buildings and/or structures that are not historic, the	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		structural engineer shall immediately notify the ERO and prepare a damage report documenting the features of the building and/or structure that has been damaged. ○ If vibration has damaged nearby buildings and/or structures that are historic, the historic preservation consultant shall immediately notify the ERO and prepare a damage report documenting the features of the building and/or structure that has been damaged. ○ Following incorporation of the alternative construction techniques and/or planning department review of the damage report, vibration monitoring shall recommence to ensure that vibration levels at each affected building and/or structure are not exceeded. • **Periodic Inspections.** The plan shall identify the intervals and parties responsible for periodic inspections. The qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures) shall conduct regular periodic inspections of each affected building and/or structure during vibration-generating construction activity on the project site. The plan will specify how often inspections shall occur.	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• **Repair Damage.** The plan shall also identify provisions to be followed should damage to any building and/or structure occur due to construction-related vibration. The building(s) and/or structure(s) shall be remediated to their pre-construction condition at the conclusion of vibration-generating activity on the site. For historic resources, should damage occur to any building and/or structure, the building and/or structure shall be restored to its pre-construction condition in consultation with the qualified historic preservation professional and planning department preservation staff. **Vibration Monitoring Results Report.** After construction is complete the project sponsor shall submit to the ERO a final report from the qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures). The report shall include, at a minimum, collected monitoring records, building and/or structure condition summaries, descriptions of all instances of vibration level exceedance, identification of damage incurred due to vibration, and corrective actions taken to restore damaged buildings and structures. The ERO shall review and approve the Vibration Monitoring Results Report.	
Impact C-NO-1: The proposed project, in combination with cumulative projects,	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
would not result in a significant cumulative impact on noise or vibration.			
Initial Study Section E.8, Air Quality (See Appendix B)			
Impact AQ-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan.	LTS	No mitigation required.	NA
Impact AQ-3: The proposed project's operational activities would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin.	LTS	No mitigation required.	NA
Impact AQ-5: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LTS	No mitigation required.	NA
Impact C-AQ-5: The proposed project, in combination with cumulative projects, would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	LTS	No mitigation required.	NA
Initial Study Section E.9, Greenhouse Gas Emissions (See Appendix B)			
Impact C-GG-1: The proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Initial Study Section E.10, Wind (See Appendix B)			
Impact WI-1: The proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use.	LTS	No mitigation required.	NA
Impact C-WI-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to wind.	NI	No mitigation required.	NA
Initial Study Section E.11, Shadow (See Appendix B)			
Impact SH-1: The proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces.	LTS	No mitigation required.	NA
Impact C-SH-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to shadow.	NI	No mitigation required.	NA
Initial Study Section E.12, Recreation (See Appendix B)			
Impact RE-1: The proposed project would not increase the use of existing neighborhood and regional parks and other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact RE-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.	NI	No mitigation required.	NA
Impact C-RE-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to recreation.	NI	No mitigation required.	NA
Initial Study Section E.13, Utilities and Service Systems (See Appendix B)			
Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, nor would it result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LTS	No mitigation required.	NA
Impact UT-2: The proposed project would not significantly increase water demand and would not require expansion or construction of new water supply or treatment facilities.	LTS	No mitigation required.	NA
Impact UT-3: The proposed project would not generate solid waste in excess of state	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
or local standards, would not impair the attainment of solid waste reduction goals, and would comply with statutes, regulations, and reduction goals concerning solid waste.			
Impact C-UT-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on utilities and service systems.	LTS	No mitigation required.	NA
Initial Study Section E.14, Public Services (See Appendix B)			
Impact PS-1: The proposed project would increase the demand for public services but not to such an extent that construction of new or physically altered facilities would be required.	LTS	No mitigation required.	NA
Impact C-PS-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts on police, fire, and school district services such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service.	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Initial Study Section E.15, Biological Resources (See Appendix B)			
Impact BI-1: The proposed project could interfere substantially with the movement of 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.	S	**Mitigation Measure M-BI-1: Nesting Bird Protection** Nesting birds and their nests shall be protected during construction by implementation of the following: a. To the extent feasible, the project sponsor shall conduct initial activities including, but not limited to, vegetation removal, tree trimming or removal, ground disturbance, building demolition, site grading, and other construction activities that may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 15). b. If vegetation removal and other construction activities during the bird nesting season cannot be fully avoided, a qualified wildlife biologist shall conduct pre-construction nesting surveys within 72 hours prior to the start of vegetation removal, construction or demolition at areas that have not been previously disturbed by project activities or after any construction breaks of 72 hours or more. Typical experience requirements for a "qualified biologist" include a minimum of four years of academic training and professional experience in biological sciences and related resource management activities and a minimum of two years of experience in biological monitoring or surveying for nesting birds. Surveys of suitable habitat shall	LTSM

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		be performed in publicly accessible areas within 100 feet of the project site in order to locate any active nests of common bird species and within 250 feet of the project site to locate any active raptor (birds of prey) nests. c. If active nests are located during the pre-construction nesting bird surveys a qualified biologist shall evaluate if the schedule of construction activities could affect the active nests; if so, the following measures shall apply, as determined by the biologist: i) If construction is not likely to affect the active nest, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the surrounding construction activity to confirm there is no adverse effect. Spot-check monitoring frequency would be determined on a nest-by-nest basis considering the particular construction activity, duration, proximity to the nest, and physical barriers that may screen activity from the nest. The qualified biologist may revise their determination at any time during the nesting season in coordination with the planning department. ii) If it is determined that construction may affect the active nest, the qualified biologist shall	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		establish a no-disturbance buffer around the nest(s) and all project work shall halt within the buffer until a qualified biologist determines the nest is no longer in use. These buffer distances shall be equivalent to the survey distances (100 feet for passerines and 250 feet for raptors); however, the buffers may be adjusted if an obstruction, such as a building, is within line of sight between the nest and construction. iii) Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be done at the discretion of the qualified biologist and in coordination with the planning department and CDFW, if necessary. Necessary actions to remove or relocate an active nest(s) shall be coordinated with the planning department and approved by CDFW, if necessary. iv) Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest, work within the no disturbance buffer(s) shall halt until the nest occupants have fledged. v) Any birds that begin nesting within the project area and survey buffers amid construction	

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
		activities are assumed to be habituated to construction-related or similar noise and disturbance levels, so no-disturbance buffer zones around nests may be reduced or eliminated in these cases as determined by the qualified biologist in coordination with the planning department and CDFW, if necessary. Work may proceed around these active nests as long as the nests and their occupants are not directly affected. d. In the event inactive nests are observed within or adjacent to the project site at any time throughout the year, any removal or relocation of the inactive nests shall be at the discretion of the qualified biologist in coordination with the planning department and CDFW, as appropriate. Work may proceed around these inactive nests.	
Impact BI-2: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	LTS	No mitigation required.	NA
Impact C-BI-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on biological resources.	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Initial Study Section E.16, Geology and Soils (See Appendix B)			
Impact GE-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, seismically induced ground failure, including liquefaction, or landslides.	LTS	No mitigation required.	NA
Impact GE-2: The proposed project would not result in substantial erosion or loss of topsoil.	LTS	No mitigation required.	NA
Impact GE-3: The proposed project would not result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse by being located on a geologic unit or soil that is unstable, or that could become unstable.	LTS	No mitigation required.	NA
Impact GE-4: The proposed project would not create substantial risks to life or property by being located on expansive soils.	LTS	No mitigation required.	NA
Impact GE-5: The proposed project would not 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.	NI	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact GE-6: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	LTS	No mitigation is required.	NA
Impact C-GE-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on geology, soils, or paleontological resources.	LTS	No mitigation required.	NA
Initial Study Section E.17, Hydrology and Water Quality (See Appendix B)			
Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	LTS	No mitigation required.	NA
Impact HY-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin.	LTS	No mitigation required.	NA
Impact HY-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion,	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
siltation, or flooding on or off site; that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or that would impede or redirect flood flows.			
Impact HY-4 The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	LTS	No mitigation required.	NA
Impact C-HY-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on hydrology and water quality.	LTS	No mitigation required.	NA
Initial Study Section E.18, Hazards and Hazardous Materials (See Appendix B)			
Impact HZ-1: The proposed project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials.	LTS	No mitigation required.	NA
Impact HZ-2: The proposed project would not 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.	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	LTS	No mitigation required.	NA
Impact HZ-4: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	LTS	No mitigation required.	NA
Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to hazards and hazardous materials.	LTS	No mitigation required.	NA
Initial Study Section E.19, Energy (See Appendix B)			
Impact EN-1: The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation.	LTS	No mitigation required.	NA
Impact EN-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	No mitigation required.	NA

Table S-3 Summary of Impacts of the 3400 Laguna Street Project Identified in the Initial Study

Environmental Impact	Level of Significance Prior to Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact C-EN-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	LTS	No mitigation required.	NA

Source: 3400 Laguna Street Initial Study, Appendix B
Impact Codes:
S = Significant
LTS = Less Than Significant
LTSM = Less Than Significant with Mitigation
NA = Not Applicable
NI = No Impact

S.4 Summary of Project Alternatives

Chapter 5, Alternatives, of this draft EIR analyzes the following alternatives:

- **No Project Alternative**
- **Rehabilitation Alternative**
- **Reduced Construction Alternative**

These alternatives represent a reasonable range of potentially feasible alternatives to the proposed project that would avoid or lessen the impacts to cultural (architectural) resources and air quality. Each alternative is summarized below.

S.4.1 No Project Alternative

Alternative Description
Under the No Project Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Under the No Project Alternative, the proposed project would continue to operate as a residential care facility with the existing square footage and the site would remain as is with no construction or excavation activity.

Summary of Impacts
Under the No Project Alternative, none of the impacts associated with the proposed project would occur. The No Project Alternative would avoid the less than significant with mitigation construction air quality and historic architectural resources impacts, as no impacts would occur due to project implementation. No other impacts would occur and mitigation would not be required for protection of archeological resources, human remains, tribal cultural resources, construction vibration impacts, or biological resources.

S.4.2 Rehabilitation Alternative

Alternative Description
The Rehabilitation Alternative would maintain the five existing buildings on the project site, would not include the demolition of any existing buildings, and would not construct two new buildings (the Bay Building and the Francisco Building). The Rehabilitation Alternative would not construct underground parking and would retain the existing landscaping. The gross square footage of the Heritage on the Marina facility would remain the same as the existing property at 83,200, and four residential care suites would be added within the existing buildings' square footage.

Similar to the proposed project, the Rehabilitation Alternative would renovate the existing Julia Morgan Building and Perry Building, and rehabilitate the façade of the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including the brick base, heating and cooling system modernization, re-pointing of bricks where needed, and roof repairs where needed in conformance with the Secretary of the Interior's Standards for Rehabilitation. Within the Julia Morgan Building, the Rehabilitation Alternative would reconfigure existing interior spaces to enable the addition of four new residential care suites and improve spaces for resident amenities. The Rehabilitation Alternative would renovate the Perry Building by updating the appearance of existing residential care suites to help modernize the facility.

The existing development controls on the project site would continue to govern site development and would not be changed. Like the proposed project, there would be no amendments to the General Plan, Planning Code, or Zoning Map. The project site would remain under the existing RM-1 Zoning District and a 40-X Height and Bulk District.

Summary of Impacts

Under the Rehabilitation Alternative, the existing uses on the project site would not change. There would be no demolition or construction of new buildings; therefore, impacts to historic architectural resources (CR-1) and construction air quality (Impact AQ-2 and Impact AQ-4) would not occur. As such, the mitigation measures developed for the proposed project would not be required as no construction or operational changes would occur. No other impacts would occur and mitigation would not be required for protection of archeological resources, human remains, tribal cultural resources, construction vibration impacts, or biological resources.

S.4.3 Reduced Construction Alternative

Alternative Description

Under the Reduced Construction Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Instead, the project site would continue to operate as a residential care facility and would expand the number of residential care suites to 98 from 86, which would be 11 fewer suites than the proposed project. The Reduced Construction Alternative would have a smaller construction footprint than the proposed project because it would result in the construction of only one new building (the proposed Francisco Building) and would retain the Perry Connector Building. The proposed Francisco Building would be constructed in a similar manner and height (40 feet) as the proposed project. The Bay Building (as proposed by the project) would not be constructed under this alternative.

The Reduced Construction Alternative, similar to the proposed project, would renovate the interior and exterior of the existing Perry Building and the existing Julia Morgan Building, including window repairs and replacements, fencing repairs (including the brick base), heating, ventilation, and cooling system modernization, re-pointing of bricks where needed, and roof repairs where needed in conformance with the Secretary of the Interior's Standards for Rehabilitation. Within the Julia Morgan Building, the Reduced Construction Alternative would also reconfigure existing spaces to enable the addition of four new residential care suites and improve spaces for resident amenities. Under the Reduced Construction Alternative, the interior of the existing Perry Connector Building would be renovated and the amenity spaces would be redesigned.

The Reduced Construction Alternative would not construct the underground parking structure, but it would require the excavation of approximately 600 cubic yards of soil up to 15 feet deep to enable construction of below-grade common areas beneath the proposed Francisco Building.

Summary of Impacts

Under the Reduced Construction Alternative, the project impacts to historic resources would be reduced. The Reduced Construction Alternative would still require the implementation of Mitigation Measure M-CR-1: Best Practices and Construction Monitoring Program for Historic Resources because it would include construction adjacent to the Julia Morgan Building that could potentially result in

accidental damage to the building. The Reduced Construction Alternative would reduce changes to the visual context of the two identified historic resources on the project site, the Julia Morgan Building (and front lawn) and the Caretakers Cottage, compared to the proposed project. The Reduced Construction Alternative would only include the construction of the proposed Francisco Building and would retain the Perry Connector Building. Even though the Reduced Construction Alternative would include proposed renovations, similar to the proposed project, the reduced construction alternative would result in less changes in the visual context of the on-site historic buildings and would minimize potential impacts due to construction. As noted above, the Reduced Construction Alternative would still require the implementation of M-CR-1. Additionally, the Reduced Construction Alternative would require the use of vibration-generating construction equipment that could also result in damage to on-site historic resources, requiring implementation of Mitigation Measure M-NO-2: Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction. With implementation of M-CR-1 and M-NO-2, the Reduced Construction Alternative would have a less than significant impact to historic resources.

Similar to the proposed project, the Reduced Construction Alternative would include demolition and grading activities as part of project construction. This alternative would result in 600 cubic yards of ground disturbance compared to the 9,600 cubic yards for the proposed project. The reduced amount of ground disturbance would translate into a reduction in truck trips and use of construction equipment and associated emissions. As such, the Reduced Construction Alternative would have reduced air quality impacts compared to the proposed project. Therefore, like the proposed project, the Reduced Construction Alternative would result in less than significant construction and operational criteria air pollutant emissions.

The Reduced Construction Alternative would potentially result in concentrations of construction cancer risk and $PM_{2.5}$ concentrations from the proposed construction that could result in significant impacts to the nearest off-site residential and childcare receptors, and as such Mitigation Measure M-AQ-4: Requirements for Off-Road Construction Equipment, would still be required. Similar to the proposed project, the Reduced Construction Alternative would result in a less-than-significant impact with Mitigation Measure M-AQ-4. Compared with the proposed project, the Reduced Construction Alternative would result in reduced impacts to air quality.

Similar to the proposed project, the Reduced Construction Alternative would require the implementation of mitigation measures to avoid or minimize significant construction-related impacts to archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources. Compared to the proposed project, impacts resulting from the Reduced Construction Alternative's ground disturbance would be reduced due to the smaller footprint of construction and excavation; therefore, any potential impacts related to archeological resources, human remains, and tribal cultural resources would be less than the proposed project, although mitigation would still be required.

Table S-4, Comparison of Proposed Project and Alternatives summarizes and compares the characteristics of the proposed project with those of each project alternative.

Table S-4 Comparison of Proposed Project and Alternatives

Project Characteristics	Proposed Project	No Project Alternative	Rehabilitation Alternative	Reduced Construction Alternative
Project Rendering				
Number of Buildings	5	5	5	5
Building Stories	3–4	1–4	1–4	3–4
Building Heights (feet)	22–41[1]	15–41	15–41	22–41
Building Gross Square Feet (gsf)	141,580	83,200	83,200	120,326
Residential Care Suites	109	86	90	98
Useable Open Space (gsf)	26,410	30,280	30,280	29,100
Off-Street Parking (spaces)	36	17	17	17
Excavation Depth (feet)	15	No additional	No additional	15
Ground Disturbance (cubic yards)	9,600	None	None	600
Entitlements	CU/PUD	None	No planning approvals	CU/PUD

S.5 Comparison of the Proposed Project and Alternatives

Table S-5, Comparison of Proposed Project and Project Alternatives, presents a summary of the ability of each alternative to meet the project sponsor's objectives and a comparison of the impacts of the proposed project and the alternatives analyzed; environmental impacts that are less than significant or no impact are not presented.

[1] References to 41-foot height reflect that the existing Perry Building has been measured at 40.5 feet tall, so with rounding is described as 41 feet tall. No changes to the Perry Building would increase its height and no other building on the project site would exceed 40 feet in height under the proposed project or any alternative.

Table S-5 Comparison of Proposed Project and Project Alternatives

	Proposed Project	No Project Alternative	Rehabilitation Alternative	Reduced Construction Alternative
Project Objectives				
Meet area senior care demands by increasing the number of care suites and making operational improvements.	Yes	No	Partial	Partial
Modernize the existing residential care facility to continue attracting new residents and provide high-quality care and services for seniors in San Francisco.	Yes	No	Partial	Partial
Maintain the historic Julia Morgan Building, Caretakers Cottage, and original landscape features of the front lawn on the project site.	Yes	Yes	Yes	Yes
Minimize neighborhood on-street parking and loading demand by building adequate parking and loading access on-site to serve the needs of project residents, workers, suppliers, and visitors.	Yes	No	No	No
Environmental Impact				
EIR Section 3.B, Historic Resources				
Impact CR-1: The proposed project may cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code.	LTSM	NI <	LTS <	LTSM <
Impact C-CR-1: The proposed project, in combination with cumulative projects, would not cause a substantial adverse change in the significance of a historical resource.	LTS	NI <	LTS <	LTSM <
EIR Section 3.C, Air Quality				
Impact AQ-2: The proposed project's construction activities would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin.	LTS	NI <	LTS <	LTS <

Table S-5 Comparison of Proposed Project and Project Alternatives

	Proposed Project	No Project Alternative	Rehabilitation Alternative	Reduced Construction Alternative
Impact AQ-4: The proposed project would expose sensitive receptors to substantial pollutant concentrations.	LTSM	NI <	LTS <	LTSM <
Impact C-AQ-4: Construction of the proposed project, in combination with cumulative projects, would expose sensitive receptors to substantial pollutant concentrations.	LTSM	NI <	LTS <	LTSM <
Initial Study Section E.4, Cultural Resources				
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archeological resource.	LTSM	NI <	LTS <	LTSM <
Impact CR-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries.	LTSM	NI <	LTS <	LTSM <
Initial Study Section E.5, Tribal Cultural Resources				
Impact TC-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.	LTSM	NI <	LTS <	LTSM <
Initial Study Section E.7, Noise				
Impact NO-2: The proposed project would generate excessive groundborne vibration or groundborne noise levels.	LTSM	NI <	LTS <	LTSM <

Table S-5 Comparison of Proposed Project and Project Alternatives

	Proposed Project	No Project Alternative	Rehabilitation Alternative	Reduced Construction Alternative
Initial Study Section E.15, Biological Resources				
Impact BI-1: The proposed project could interfere substantially with the movement of 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.	LTSM	NI <	LTS <	LTSM <

Source: Compiled by LSA (2024).
Impact Codes:
NI = No Impact
LTS = Less Than Significant
LTSM = Less Than Significant with Mitigation
< (less than proposed project impact)

S.6 Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e) requires an EIR to identify the alternative to the proposed project that would have the least adverse environmental impacts (i.e., the "environmentally superior alternative"). Based on the analysis and comparison of the impacts of the alternatives presented above, the No Project Alternative would be the environmentally superior alternative as it would result in no impacts. While the No Project Alternative would cause fewer environmental impacts compared to the proposed project, CEQA Guidelines section 15126.6(e)(2) provides that if the "no project" alternative is the environmentally superior alternative, the EIR should also identify an environmentally superior alternative in addition to the No Project Alternative.

As shown above, the Rehabilitation Alternative would develop an additional four suites on the project site and increase the number of available suites from 86 to 90. Compared to the proposed project, the Rehabilitation Alternative would avoid impacts associated with historic resources and would not require the implementation of mitigation measures associated with built historic resources, as would be required under the proposed project. In addition, the Rehabilitation Alternative would minimize potential impacts to below ground resources, would not require the use of vibration-generating construction equipment, and would reduce potential construction air quality impacts. Additionally, mitigation measures presented in the initial study for the proposed project would not be required under the Rehabilitation Alternative. All of the significant or potentially significant impacts identified in the initial study would be avoided or reduced and would either result in a less-than-significant or no impact finding, thus minimizing impacts compared to the proposed project. As such, the Rehabilitation Alternative is considered the environmentally superior alternative.

S.7 Areas of Known Controversy and Issues to Be Resolved

Based on comments received on the Notice of Preparation of an EIR potential areas of controversy for the 3400 Laguna Street Project include:

- Impacts related to archeological and tribal cultural resources
- Impacts on the operation of public transportation
- Impacts from construction noise
- Air quality impacts from construction and excavation in the Air Pollutant Exposure Zone area
- Impacts to greenhouse gas emissions
- Impacts from increased shadows on open spaces and parks
- Impacts on traffic congestion and parking
- Potential for subsidence and liquefaction
- Impacts from hazards and hazardous materials due to the proposed project's proximity to contaminated soils
- Potential for airborne hazards from asbestos and lead-based paints
- Impacts on scenic views and vistas
- New sources of light and glare
- Impacts to historic resources from excavation
- Impacts to the integrity of a historic resource
- Inconsistencies with the City Zoning and Municipal Code
- Impacts to potential candidate or special status species from project implementation

CHAPTER 1 INTRODUCTION

1.A Project Summary

The approximately 68,090-square-foot (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The project site is within the RM-1 (Residential-Mixed, Low Density) Zoning District, and a 40-X Height and Bulk District. Most of the properties in the immediate vicinity are designated as RM-1, RM-2 (Residential-Mixed, Moderate Density), RH-3 (Residential-House, Three Family), and RM-4 (Residential-Mixed, High Density). The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The project site has been occupied by the Heritage on the Marina residential care retirement community since 1925. Heritage on the Marina consists of five existing structures of approximately 83,200 gross square feet: the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage.

The proposed project would continue to operate as a residential care facility. The proposed project would demolish two of the five existing buildings (the Perry Connector Building and the Health Center) and construct two new buildings (the Bay Building and the Francisco Building). The two new structures would not exceed 40 feet in height and would be located in the same locations as the demolished structures. The existing Julia Morgan and Perry buildings would be interconnected to the two new buildings, similar to the existing configuration. In addition, the proposed project would also include renovations to the Julia Morgan and Perry buildings. In total, the proposed project would add approximately 58,380 square feet of net new institutional use to a total of 141,580 square feet and increase the number of residential care suites by 23, from 86 to 109.

1.B Purpose of this EIR

This EIR was prepared in accordance with all criteria, standards, and procedures of the California Environmental Quality Act (CEQA), as amended (California Public Resources Code section 21000 et seq.); the CEQA Guidelines (California Code of Regulations title 14, section 15000 et seq.); and San Francisco Administrative Code chapter 31. In accordance with CEQA section 21067 and CEQA Guidelines sections 15367 and 15050–15053, the City and County of San Francisco (City) is the lead agency, under whose authority this document has been prepared.

As described by CEQA and the CEQA Guidelines, public agencies are charged with a duty to avoid or substantially lessen significant environmental effects, where feasible. In undertaking this duty, a public agency has an obligation to balance a project's significant effects on the environment with its benefits, including economic, social, technological, legal, and other non-environmental characteristics.

As defined in CEQA Guidelines section 15382, a "significant effect on the environment" is:

> "… a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic

> change related to a physical change may be considered in determining whether the physical change is significant."

CEQA requires an EIR to be prepared before a local agency makes its first discretionary decision to approve a project that may cause a significant effect on the environment that cannot be mitigated. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental impacts of a project, identify mitigation measures to lessen or eliminate significant adverse impacts, and examine feasible alternatives to the project.

The City must consider the information in this EIR and make certain findings with respect to each significant effect identified. The decision-makers will review and consider the information in this EIR, along with other information available through the public review processes, before they decide to approve, disapprove, or modify the proposed project or adopt an alternative to the proposed project.

1.C Type of EIR

This document is a project-level EIR, pursuant to CEQA Guidelines section 15161. A project-level EIR focuses on changes in the environment that would result from construction and operation of a specific project. Furthermore, this EIR is also a focused EIR, pursuant to CEQA Guidelines section 15063(c)(3). An initial study was prepared for the proposed project in accordance with sections 15062 and 15082 (refer to Appendix B of this EIR). The initial study is being published concurrently with the EIR, and comments will be accepted on the initial study during the public review period for the EIR.[1] The initial study identifies the topics for which the proposed project would result in less than significant impacts or impacts that could be reduced to less than significant with implementation of the mitigation measures identified in the initial study, and therefore do not require further analysis in this EIR. Thus, this EIR focuses the environmental analysis on the topics identified in the initial study (e.g., historic architectural resources and construction-period air quality) with the potential to have significant environmental impacts.

An EIR is an informational document used by a lead agency (in this case, the City) when considering approval of a project. The purpose of an EIR is to provide public agencies and members of the public with detailed information regarding the environmental effects of implementing a proposed project. An EIR should analyze a project's environmental consequences, identify ways to reduce or avoid a project's potential environmental effects, and identify alternatives to a project that can avoid or reduce impacts. This EIR provides information to be used in the planning and decision-making process regarding the environmental impacts of the proposed project. It is not the purpose of an EIR to recommend approval or denial of a project.

Before it can approve the project, the City, as the lead agency and decision-making entity, must certify that this EIR was completed in compliance with CEQA, that the information in the EIR was considered, and that the EIR reflects the City's independent judgment. CEQA requires decision-makers to balance the benefits of a project against its unavoidable environmental consequences. If environmental impacts are identified as significant and unavoidable, the City may still approve the project if it finds that social, economic, or other benefits outweigh the unavoidable impacts of the project. The City

[1] Under CEQA Guidelines section 15128, the EIR must contain a brief statement indicating the reasons why certain effects were determined not to be significant and, thus, are not studied in detail in the EIR. CEQA Guidelines are available online at https://www.califaep.org/docs/2024_CEQA_Statute_and_Guidelines_Handbook.pdf, accessed April 18, 2024.

would then be required to state in writing the specific reasons for approving the project, based on information in the EIR and other information sources in the administrative record. This reasoning is called a "statement of overriding considerations" (Public Resources Code section 21081; CEQA Guidelines section 15093). In addition, the City must adopt a mitigation monitoring and reporting program, describing the measures that were made a condition of project approval to avoid or lessen significant effects on the environment (Public Resources Code section 21081.6; CEQA Guidelines section 15097). The mitigation monitoring and reporting program, which is adopted at the time of project approval, is designed to ensure compliance with the project description and EIR mitigation measures during and after project implementation. If the City decides to approve the project, it will be responsible for verifying that the mitigation monitoring and reporting program for this project is implemented. The EIR will be used primarily by the City during approval of future discretionary actions and permits required for the proposed project.

1.D CEQA Environmental Review Process

CEQA Guidelines sections 15080 through 15097 set forth the EIR process, which includes multiple phases involving notification and input from responsible agencies and the public, as described below.

1.D.1 Notice of Preparation of an Environmental Impact Report

Consistent with the requirements of CEQA Guidelines sections 15063 and 15082, the planning department has made a good-faith effort during the preparation of the draft EIR to contact all responsible and trustee agencies; organizations and persons who may have an interest in the proposed project; and all applicable government agencies, including the Governor's Office of Planning and Research, State Clearinghouse.

This outreach effort included the circulation of a Notice of Availability (NOA) of a Notice of Preparation (NOP) that an EIR would be prepared on November 1, 2023, which began a 30-day comment period that ended on December 1, 2023. The NOA of NOP requested that agencies and interested parties' comment on the scope and content of the environmental information to be included in the draft EIR. The NOA of NOP and NOP are included as Appendix A to the EIR.

Due to procedural errors, an NOA of the NOP and NOP were reissued for an additional 30-day public review period, from May 8, 2024, to June 7, 2024.[2] The reissued NOA of NOP and NOP are also included in Appendix A. Comments received during the November 1 through December 1, 2023 public review period remain valid and are considered equally in the initial study and EIR.

[2] The two procedural errors in the November 2023 publication were failing to submit such documents to the Office of Planning and Research State Clearinghouse and failure to provide notice in a newspaper of general circulation, pursuant to California Public Resources Code, section 21080.4(a); CEQA Guidelines section 15082; and Chapter 31.11 of the San Francisco Administrative Code.

1.D.2 Comments Received During the NOP Comment Period

The planning department has considered the comments made by the public and agencies in preparation of this EIR, as summarized in **Table 1.D-1, Summary of Comments Received During the NOP Comment Period**. Comments on the NOP that relate to environmental issues are addressed and analyzed throughout this EIR and initial study (see Appendix B for the initial study). The scoping comments, as summarized in the table below, also indicate areas of controversy known to the lead agency and issues to be resolved, per CEQA Guidelines section 15123. Table 1.D-1 identifies the section of the initial study or EIR where the comments are addressed. A total of 37 comment letters were received during the 30-day comment period, which began on November 1, 2023, and ended on December 1, 2023; these are included in Appendix A.1. One relevant comment letter was received during the additional 30-day comment period, which began on May 8, 2024 and ended on June 7, 2024; this is included in Appendix A.2.[3]

Table 1.D-1 Summary of Comments Received During the NOP Comment Period

Comment Summary	Location in Draft EIR or Initial Study
Construction timeline inconsistencies	EIR Chapter 2, Project Description
Description of existing and proposed structure inconsistencies	EIR Chapter 2, Project Description
Comments included concern regarding excavation impacts on the structural integrity of the Julia Morgan Building and other surrounding properties. Additional comments expressed concerns that the proposed project would be built on soils that are prone to subsidence and liquefaction.	EIR Section 3.B, Historic Resources, Initial Study Section E.16, Geology and Soils
Concerns about the scale of the new buildings and their relationship to the Julia Morgan Building. The commenters mentioned that the new buildings would reduce the views of the Julia Morgan Building due to their height and their lack of continuity with the architectural style of the Julia Morgan Building, and would detract from the historic nature of the building. Additionally, commenters expressed concern that the new buildings would diminish the green space in front of the Julia Morgan Building by their sheer size and potential for excavation to harm archeological and tribal resources.	EIR Section 3.B, Historic Resources Initial Study Sections E.4, Cultural Resources, E.5, Tribal Cultural Resources
Comments expressed concerns regarding air pollution from construction and excavation activities, and exposure to vulnerable populations in nearby open spaces and recreational facilities. Additional	EIR Section 3.C, Air Quality

[3] A second communication was received at the project email address during the review period; however, this communication did not reference or make any comments on the proposed project or the environmental review and is therefore not included in the EIR.

Table 1.D-1 Summary of Comments Received During the NOP Comment Period

Comment Summary	Location in Draft EIR or Initial Study
comments expressed concerns regarding increased air pollution from generator use and loading dock operations as well as ambient air pollution.	
Comments on potential impacts to Land Use and Planning expressed concerns regarding the proposed project's consistency with City policies related to preservation of affordable housing, maintenance of the character of the Marina neighborhood, and inconsistency with the current allowable land usages. The comments also raised concerns about how the proposed project would violate the currently approved conditional use permit due to the increased density of residential units.	Initial Study Section C, Compatibility with Existing Zoning and Plans
Comments on potential impacts to population and housing included concerns regarding how the proposed project does not contribute to the City's equitable housing stock and therefore does not support the City's housing goals and policies.	Initial Study Section C, Compatibility with Existing Zoning and Plans
Project would adversely affect visual character and result in new source of light and glare	Initial Study Section E.1, No Impact or Not Applicable Environmental Topics
Excavation could harm archeological and tribal resources.	Initial Study Sections E.4, Cultural Resources, E.5, Tribal Cultural Resources
Comments included concerns regarding Transportation and Circulation topics such as additional congestion and the potential impact to nearby Muni lines. Additional comments detailed concerns regarding pedestrian safety and commercial drop-off and loading regulations on Bay Street.	Initial Study Section E.6, Transportation and Circulation
Comments expressed concerns regarding the duration of construction period noise, as it could be longer than described. Additional comments expressed concerns that noise from loading dock operations on residential streets are likely to impact the neighborhood, and that traffic along Bay Street will increase noise in the surrounding neighborhood.	Initial Study Section E.7, Noise
Comments expressed concerns regarding increased GHG emissions from generator use. Additional comments included concerns about the scale of the increased carbon footprint in exchange for a small number of new housing units as well as a	Initial Study Section E.9., Greenhouse Gas Emissions, and Section E.19, Energy

Table 1.D-1 Summary of Comments Received During the NOP Comment Period

Comment Summary	Location in Draft EIR or Initial Study
recommendation for the project to achieve a LEED zero certification.	
Comments included concern for the shadows the new building will cast on nearby public facilities like Moscone Park.	Initial Study Section E. 11, Shadow
Comments included concerns over reduced street parking for nearby public parks.	Initial Study Section E.12, Recreation
Comments included concerns over the removal of mature trees that act as a habitat for sensitive natural communities.	Initial Study Section E.15, Biological Resources
Comments included concerns regarding impacts to potential for "take" of candidate or special-status species.	Initial Study Section E.15, Biological Resources
Comments included concerns that project construction will result in the disturbance of VOCs, asbestos, and lead-based paints that will become airborne and harm nearby sensitive receptors. Additional comments included concerns about the project compliance with the Maher ordinance due to the project's proximity to former PG&E North Beach Manufactured Gas Plants.	Initial Study Section E.18, Hazards and Hazardous Materials

1.D.3 Draft EIR and Initial Study Public Review Process

The CEQA Guidelines and San Francisco Administrative Code chapter 31 encourage public participation in the planning and environmental review processes. The City will provide opportunities for the public to present comments and concerns regarding this EIR and its CEQA process. These opportunities will occur during the draft EIR and initial study public review and comment period as well as at a public hearing before the San Francisco Planning Commission (planning commission).

The public review period for the draft EIR and initial study is from August 28 to 5:00 p.m. on October 15, 2024. The planning commission public hearing will be held on September 26, 2024. Members of the public may attend this hearing in person at San Francisco City Hall, Room 400. Additional information may be found on the planning department's website at https://sfplanning.org/hearings-cpc-grid.

The draft EIR, initial study, and all attachments are available for public review and comment on the planning department's Negative Declarations and EIR's web page (https://sfplanning.org/sfceqadocs). A USB or paper copy of the draft EIR and any requested reference material will be mailed upon request. Contact the EIR coordinator, Megan Calpin, at CPC.3400LagunaEIR@sfgov.org or (628) 652-7508.

Governmental agencies, interested organizations, and other members of the public are invited to submit written comments on the draft EIR and initial study during the public review period. The comments should address the sufficiency of the document with respect to identifying and analyzing possible significant environmental impacts, determining how they may be avoided or mitigated, and adequacy of the alternatives evaluated to reduce significant impacts of the proposed project. All written comments or questions about the draft EIR should be addressed to:

San Francisco Planning Department
Attention: Megan Calpin, Environmental Planner
49 Van Ness Avenue, Suite 1400
San Francisco, CA 94103
CPC.3400LagunaEIR@sfgov.org

Comments are most helpful when they address the environmental analysis itself or suggest specific alternatives and/or additional measures to mitigate the significant environmental impacts of the proposed project.

Members of the public are not required to provide personal identifying information when they communicate with the planning commission. All written or verbal communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the planning department's website or in other public documents.

1.D.4 Final EIR and EIR Certification

Following the close of the public review and comment period for this draft EIR, the City will prepare and publish a document titled "Responses to Comments." This document will contain all mailed or emailed comments sent to the EIR coordinator and all recorded oral comments at the draft EIR hearing and written responses to those comments, along with copies of the letters or emails received, a transcript of the public hearing on the draft EIR, and any necessary revisions to the draft EIR. The draft EIR and the responses to comments document will constitute the final EIR. Not less than 10 days prior to the planning commission hearing to consider certification of the final EIR, the final EIR will be made available to the public and any board(s), commission(s) or department(s) that will carry out or approve the proposed project.

The planning commission, in a noticed public meeting, will consider the documents and, if found adequate, accurate, and objective, certify the final EIR, provided it (1) was completed in compliance with CEQA; (2) was presented to the planning commission and the commission reviewed and considered the information contained in the final EIR prior to taking an approval action on the proposed project; and (3) reflects the lead agency's independent judgment and analysis. CEQA requires that agencies shall neither approve a project nor implement a project unless the project's significant environmental impacts have been reduced to a less than significant level, thereby essentially eliminating, avoiding, or substantially lessening the potentially significant impacts of the proposed project, except when certain findings are made. If an agency approves a project that would result in the occurrence of significant adverse impacts that cannot feasibly be mitigated to less than significant levels (that is, significant and unavoidable impacts), the agency must state the reasons for

its action in writing; demonstrate that mitigation is infeasible, based on the EIR or other information in the record; and adopt a statement of overriding considerations.

1.D.5 Mitigation Monitoring and Reporting Program

At the time of project approval, CEQA and the CEQA Guidelines require agencies to adopt a mitigation monitoring and reporting program and to make that program a condition of project approval, to mitigate or avoid significant impacts on the environment (CEQA section 21081.6; CEQA Guidelines section 15097). This draft EIR identifies and presents mitigation measures that would form the basis of such a mitigation monitoring and reporting program. In addition, mitigation measures that were recommended in the initial study will be included in the mitigation monitoring and reporting program.

1.E Contents and Organization of this EIR

Consistent with CEQA Guidelines sections 15120 to 15132, this draft EIR describes the proposed project, required approvals, and existing land use plans and policies applicable to the proposed project (see initial study Section C, Compatibility with Existing Zoning and Plans for a discussion of plans and policies applicable to the project); identifies potential environmental impacts of the proposed project, mitigation measures where those impacts are determined to be significant, and cumulative adverse impacts to which the proposed project could make a substantial contribution; discusses growth-inducing and significant unavoidable effects of the project; and evaluates alternatives to the proposed project that could avoid or reduce significant impacts while still meeting most of the project's objectives.

This draft EIR has been organized as follows:

- **Summary:** This chapter summarizes the draft EIR by providing a concise overview of the proposed project, including the project description and requisite approvals; the environmental impacts that would result from implementation of the proposed project; mitigation measures identified to reduce or avoid these impacts; alternatives to the proposed project; and areas of controversy and issues to be resolved.

- **Chapter 1, Introduction:** This chapter includes a discussion of the purpose of this EIR; the environmental review process; the comments received on the scope of the draft EIR; opportunities for public participation in the environmental review process; and the organization of the draft EIR.

- **Chapter 2, Project Description:** This chapter presents a detailed discussion of the location, setting, and characteristics of the project site; the project objectives; the project features; the construction schedule and anticipated activities; and required project approvals.

- **Chapter 3, Environmental Setting, Impacts, and Mitigation Measures: This** chapter describes the existing environmental setting and regulatory framework, as well as the direct, indirect, and cumulative impacts of the proposed project and the approach to analysis. Mitigation measures are identified, where feasible, to minimize significant environmental effects of the proposed project. Each environmental topic is discussed in a separate section of this chapter.

- **Section 3.B, Historic Resources:** This section describes impacts of the proposed project related to the historic architectural nature of the project site.
- **Section 3.C, Air Quality:** This section describes the air quality impacts of the proposed project related to construction activities.

- **Chapter 4, Other CEQA Considerations:** This chapter describes the growth-inducing impacts of the proposed project, any significant and unavoidable environmental impacts of the project, and any significant irreversible environmental changes that would result from implementation of the project.

- **Chapter 5, Alternatives:** This chapter describes a reasonable range of alternatives to the proposed project; evaluates the extent to which those alternatives could substantially lessen the significant impacts of the proposed project while attaining most of the project objectives; and compares the effects of the alternatives to those of the proposed project. As required by CEQA, this section also describes and analyzes a No Project Alternative, in addition to describing alternatives considered but rejected and identifies the environmentally superior alternative, as required by CEQA. Alternatives evaluated in this chapter include the following:
  - No Project Alternative
  - Rehabilitation Alternative
  - Reduced Construction Alternative

- **Chapter 6, Report Preparation:** This chapter presents the persons involved in preparing this document.

- **Appendices:** The following appendices are included in this draft EIR:
  - Appendix A, Notice of Preparation of an Environmental Impact Report and Comments Received
    - Appendix A.1, Notice of Preparation (Circulated November 1, 2023)
    - Appendix A.2, Notice of Preparation (Reissued May 8, 2024)
  - Appendix B, Initial Study
  - Appendix C, Historic Resources Analysis and Supporting Information
    - Appendix C.1, 3400 Laguna Street Historic Resource Evaluation
    - Appendix C.2, 3400 Laguna Street Historic Resource Review
    - Appendix C.3, 3400 Laguna Street Julia Morgan Building and Caretaker's Cottage Character-Defining Features
  - Appendix D, Air Quality Analysis and Supporting Information
    - Appendix D.1, 3400 Laguna Street Air Quality and Health Risk Assessment and Methodology
    - Appendix D.2, 3400 Laguna Street Air Quality and Health Risk Assessment Results
  - Appendix E, Trip Generation, Freight Loading, and Passenger Loading Memo

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CHAPTER 2 PROJECT DESCRIPTION

2.A Project Overview

The approximately 68,090-square-foot[1] (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The project site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west (see **Figure 2-1**). The project site slopes upward from west to east approximately 30 to 40 feet above mean sea level.

The project site is currently occupied by the Heritage on the Marina residential care retirement community. Heritage on the Marina consists of four existing interconnected structures and a separate Caretaker's Cottage, totaling five structures on site and approximately 83,200 gross square feet. The interconnected structures include: the Julia Morgan Building, the Perry Building, the Perry Building Connector, and the Health Center. These buildings are further described below.[2]

- The **Julia Morgan Building,** built in 1925, is U-shaped, three stories and approximately 40 feet in height, with up to 6.5 feet of rooftop appurtenances. The primary façade of the building faces west and is viewed from Laguna Street. The building has a partially above-ground basement level and an attic story penthouse over the east portion of the front façade. The building serves as the primary pedestrian entrance to the site, but is not accessible pursuant to the Americans with Disabilities Act (ADA).[3]

- The **Perry Building**, built in 1957, is rectangular, four stories and approximately 41 feet in height over a partially above-ground basement. The building has an enclosed fire access stair on the Bay Street side that projects about 8 feet above the roofline, and the existing elevator penthouse extends about 16 feet above the 41-foot roofline.

- The **Perry Building Connector**, built in 1957, is rectangular, two stories and approximately 22 feet in height over a partially raised basement. The Perry Building Connector runs east to west to connect the Julia Morgan Building to the Perry Building.

- The **Health Center**, built in 1963, is rectangular, one story and approximately 15 feet in height, with an additional 5 feet of rooftop appurtenances up to 20 feet. The Health Center runs east to west and intersects the Perry Building on its southeast corner. This building is currently the only ADA-accessible building on the project site from the public right-of-way.

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1 All square footages are approximate and rounded to the nearest multiple of ten.

2 Adjacent properties at 1530 Francisco Street, 1536–1538 Francisco Street, and 3325–3327 Octavia Street are also owned and operated by Heritage on the Marina but are not part of the project site, and no changes to these facilities are proposed.

3 Although this building serves as the primary pedestrian entrance to the site, it is non-compliant with Americans with Disabilities Act (ADA) accessibility requirements. The Health Center, along Francisco Street, is instead used as the site's only ADA entrance.

- The **Caretaker's Cottage**, built between 1928 and 1929, is an L-shaped structure that is one story and 22 feet in height. It is located on the northeast corner of the property and is enclosed by an iron and wooden fence and gate.

Overall, the existing site has 26,410 square feet of usable open space. The Julia Morgan Building, the Perry Building Connector, the Perry Building, and the Health Center surround a central courtyard. There is a second courtyard east of the Perry Building on the eastern boundary of the project site.[4] The site also contains a front lawn that is located between the existing entrance to the Julia Morgan Building and Laguna Street (see **Figure 2-2**).

[4] Although this courtyard is part of the 68,090-square-foot project site, it is excluded from most figures because the courtyard would not be altered by the proposed project.

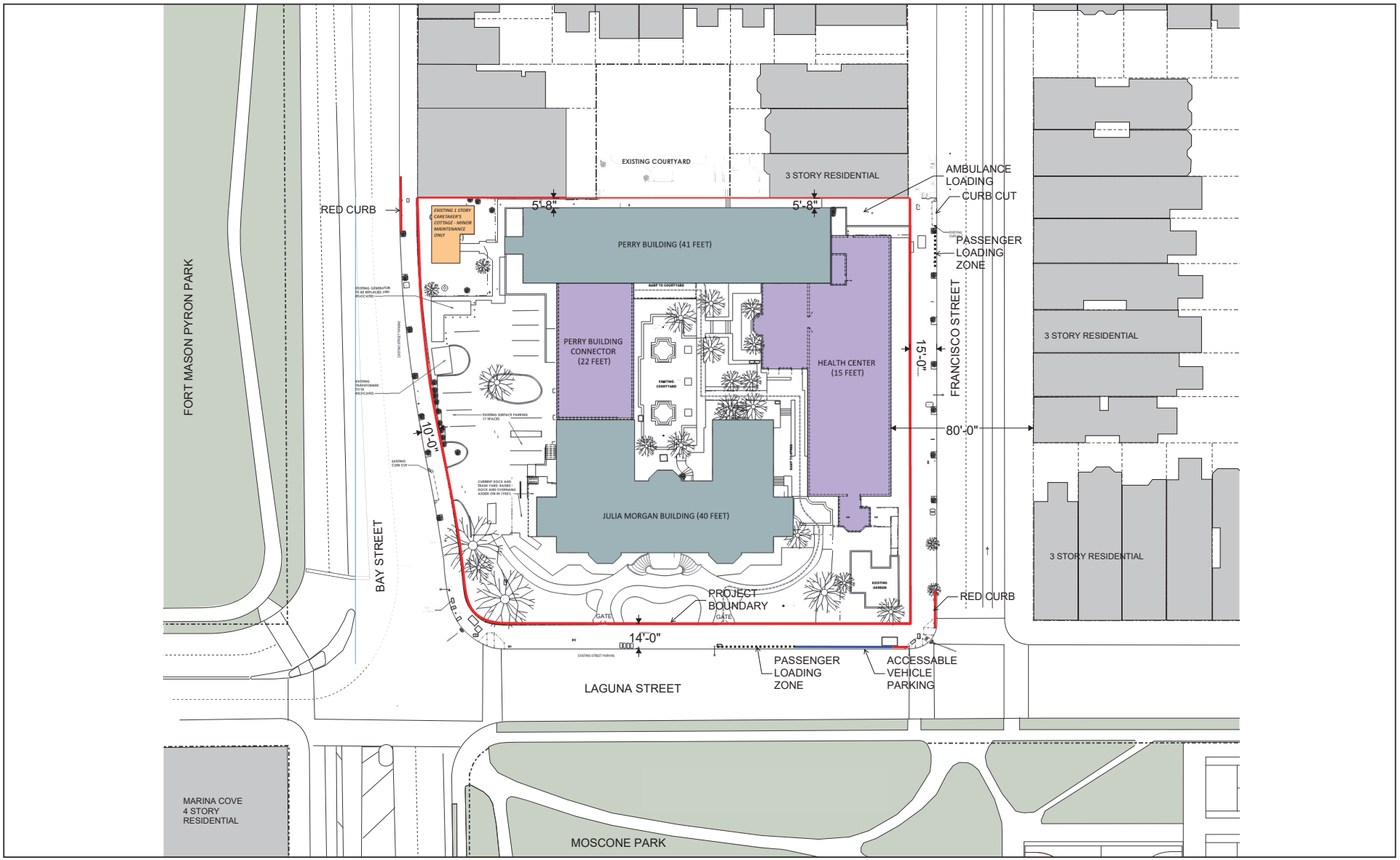
FIGURE 2-1

0 500
FEET

SOURCE: Esri Street Map 2024

3400 Laguna Street Project

Project Location



LEGEND

- Project Area
- Building to be Demolished
- Building to be Renovated
- Minor Maintenance Only
- Accessible Path of Travel

0 50 100

FEET

SOURCE: HKS, Inc.

FIGURE 2-2

3400 Laguna Street Project

Existing Site Plan

2.B Project Objectives

The project sponsor has identified the following objectives of the project:

- Meet area senior care demands by increasing the number of care suites and making operational improvements.
- Modernize the existing residential care facility to continue to attract new residents and provide high-quality care and services for seniors in San Francisco.
- Maintain the historic Julia Morgan Building, Caretaker's Cottage, and original landscape features of the front lawn on the project site.
- Minimize neighborhood on-street, project site-related parking and loading demand by building adequate parking and loading access on-site to serve the needs of project residents, workers, suppliers, and visitors.

2.C Project Location and Existing Site Characteristics

The project site is located at the southeast corner of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, three- and four-story single- and multi-family residences near and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. Moscone Recreation Center is located to the west and Upper Fort Mason (the southwest portion of Fort Mason) is north of the project site. Land uses in the surrounding area include a mixture of single- and multi-family residential, public, and commercial uses.

2.C.1 Existing Land Use and Zoning

Land uses within the immediate vicinity of the project site include the one-story Moscone Recreation Center (1800 Chestnut Street), three- to four-story residential buildings (3300–3360 Laguna Street, 1507–1575 Francisco Street, and 3315–3360 Octavia Street) approximately 30 to 40 feet in height, Fort Mason (2 Marina Boulevard), and a four-story, 40-foot-tall apartment complex (1550 Bay Street). Fort Mason is part of the Golden Gate National Recreation Area and contains parks, public artwork, restaurants, museums, cultural and artistic centers, and a hostel. Moscone Recreation Center includes a children's playground, picnic areas, sports fields and bleachers, and a gymnasium. The one-story Marina Public Library is also located on the same site as the recreation center.

The project site is within the RM-1 (Residential-Mixed, Low Density) Zoning District, and a 40-X Height and Bulk District. Most of the properties in the immediate vicinity are designated as RM-1, RM-2 (Residential-Mixed, Moderate Density), RH-3 (Residential-House, Three Family), and RM-4 (Residential-Mixed, High Density). Within 0.3 mile of the project site, there are properties designated as NC-2 (Neighborhood Commercial District, Small Scale), NC-3 (Neighborhood Commercial District, Moderate Scale), and NC-S (Neighborhood Commercial District, Shopping Center).

2.C.2 Existing Site Access

Primary vehicular ingress to and egress from the project site is via an existing 18-foot-wide driveway on Bay Street. Bay Street is an east-west, four-lane throughfare, while Laguna Street is a north-south, two-lane road that also provides bicycle access to the project site. Laguna Street merges into Marina Boulevard, north of the project site.

Pedestrian access to the site is provided via gates along Laguna Street that access internal sidewalks connecting to the Julia Morgan Building entrances and an additional accessible entrance from Francisco Street through the Health Center building.

The project site is served by the City's transit network and is located two blocks north from the intersection of Chestnut Street and Laguna Street, which serves as a bus stop for Muni Routes 30 and 43. In addition, the project site is located three blocks north of Lombard Street/US 101, which serves as a main throughfare and access point to the City and provides access to Muni Routes 28 and 91.

2.C.3 Existing Parking and Loading Operations

The project site includes 17 off-street vehicle parking spaces and 2 off-street loading spaces, which are accessible via the existing 18-foot-wide driveway along Bay Street. The project site has approximately 45 feet of passenger loading (white curb) and 20 feet of accessible parking (blue curb) on the Laguna Street frontage, and 22 feet of loading (white curb) on the Francisco Street frontage with an approximately 18-foot-wide curb cut that was previously used to allow emergency vehicle loading.[5]

Truck loading activities currently occur on Bay Street. Current loading activities require trucks to temporarily block the sidewalk as they maneuver into the loading area over the curb cut, but not block the sidewalk or the street once parked at the on-site loading dock. Current loading activity takes place several times a week, depending on the type of delivery. For example, food deliveries take place approximately two to three times a week depending on the provider. For each delivery, most trucks are on site for approximately 30–45 minutes. The largest delivery trucks are 26-foot, single-axle trucks, with the smallest being commercial delivery vans. Trash pickup takes place at the loading dock twice weekly for approximately five minutes.

2.C.4 Existing Historic Status

The project site is not listed in the National Register of Historic Places or the California Register of Historical Resources, nor is it a local San Francisco article 10 landmark; however, the site is eligible for listing in the California Register of Historical Resources (refer to Appendix B, Initial Study, Section E.3, Cultural Resources for additional information). The planning department received an article 10 Historic Landmark Designation application for the Julia Morgan Building on the project site on March 22, 2024 and on May 15, 2024 the Historic Preservation Commission recommended adding the property to the department's landmark designation work program.[6] One August 21, 2024, the Historic Preservation Commission recommended initiation of the Landmark Designation per article 10 (planning code section 1006).[7]

2.D Proposed Project Characteristics

The proposed project would maintain the current operation at the site as a residential care facility. The proposed project would demolish two of the five existing buildings (the Perry Building Connector

[5] The property previously operated a Skilled Nursing Unit (now decommissioned) that required 22 feet of passenger loading (white curb) on the Francisco Street frontage and an off-street loading space for emergency vehicles with a curb cut on Francisco Street.

[6] San Francisco Planning Department, Case No. 2024-001869DES, Ladies' Protection and Relief Society (3400 Laguna Street), heard at the San Francisco Historic Preservation Commission on May 15, 2024.

[7] San Francisco Historic Preservation Commission, Resolution 1416, Ladies' Protection and Relief Society Landmark Designation Initiation, August 21, 2024.

and the Health Center) and construct two new buildings (the Bay Building and the Francisco Building) of heights not to exceed 40 feet (excluding permitted rooftop appurtenances) in the same locations as the demolished structures. The existing Julia Morgan and Perry buildings would be interconnected to the two new buildings, similar to the existing on-site buildings' configuration. The proposed project would also renovate the Julia Morgan and Perry buildings. In total, the proposed project would add approximately 58,380 square feet of net new institutional use to result in a total of 141,580 square feet and increase the number of residential care suites by 23, from 86 to 109. The project would not include any changes to the Caretaker's Cottage or the front lawn of the Julia Morgan Building.

Table 2-1, Proposed Project Details provides a summary of the proposed project compared to existing conditions.

Table 2-1 Proposed Project Details

Project Component	Existing	Proposed	Net Change
Number of Building(s)	5	5	0
Maximum Building Stories[1]	4	4	0
Maximum Building Height (feet)[1]	41	41	0
Building Gross Square Feet	83,200	141,580	+58,380
Residential Care Suites	86	109	+23
Useable Open Space (gross square feet)	26,410	30,280	+3,870
Off-Street Parking Spaces	17	36	+19
Off-Street Loading Spaces	2	1	-1
On-Street Parking Spaces[2]	28	20	-8
Off-Street Car Share Space	0	1	+1
On-Street Commercial Loading Spaces	0	0	0
On-Street Passenger Loading Spaces	3	2	-1

Source: HKS Inc. and Kimley-Horn, Project Plans (January 10, 2024).
Notes: All gross square footage numbers are rounded to the nearest multiple of 10.
[1] Reflects the maximum building height (without rooftop appurtenances) and number of stories; existing buildings vary across the site. The existing Perry Building is 40.5 feet tall (rounded to 41 feet tall) and no changes to this building's height are proposed. The new Bay and Francisco building heights would not exceed 40 feet (not including allowable rooftop appurtenances up to 16 feet above 40 feet).
[2] Reduction in parking due to bulb-outs required by planning code section 138.1, Streetscape and Pedestrian Improvements. In addition, one on-street parking space on Bay Street would be removed for the project's new driveway; however, one on-street parking space would be added on Francisco Street because the proposed project would eliminate the existing 22-foot passenger loading space and the existing curb cut.

2.D.1 Proposed Building Program

The proposed project would include two new buildings (the Bay Building and the Francisco Building). The new Bay Building would be approximately 31,300 gross square feet and include a resident's roof deck, independent living suites, assisted living amenities, memory support accommodations, reception, lounge, administration, and laundry. The new Bay Building would be interconnected to the

renovated Julia Morgan and Perry buildings. A 29-foot-tall glass hyphen[8] that would be slightly recessed from the north elevation of the Julia Morgan Building would provide a separation between the new Bay Building and the Julia Morgan Building so that the two buildings could be visually perceived as being separate structures. The new Bay Building would be 40 feet tall (excluding rooftop appurtenances) and four stories over basement. The planned basement and ground-floor levels would provide a vehicle ramp to the proposed garage. There would be a 10-foot horizontal separation between the two upper levels of the Bay Building and the existing Julia Morgan Building.

The new Francisco Building would be approximately 47,100 gross square feet and include independent living suites, support areas (fitness, physical therapy, arts and crafts) and staff facilities. The proposed Francisco Building would be four stories over basement and would not exceed 40 feet in height, excluding code-compliant rooftop appurtenances. It would be connected to the existing Perry Building at the southeast corner of the project site on all levels.

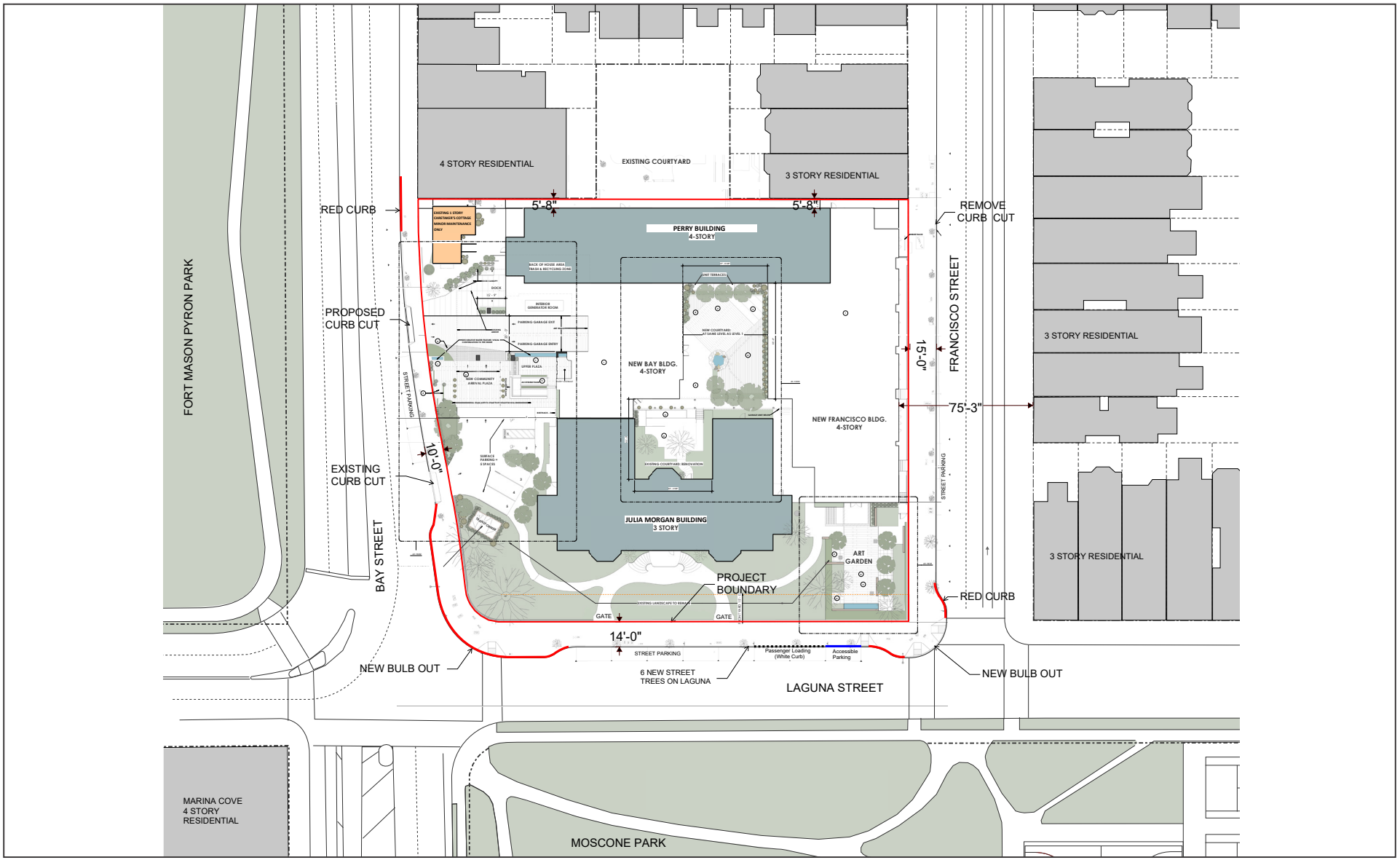
The proposed new Bay and Francisco buildings would have flat roofs; the Bay Building would also include a 3,080-square-foot occupied roof deck positioned away from neighboring residences. The roof deck would be serviced by two elevators (service elevator and passenger elevator) with a small shade trellis (approximately 500 square feet). The elevator penthouse would be 16 feet tall above the roof deck. Two staircases would be constructed to access the Bay Building roof, and one staircase constructed to access the Francisco Building roof.

The project's proposed mechanical system requires use of rooftop compressors. The compressors would range from 4 to 10 feet in height above the proposed new buildings' rooftop levels, pending final design. The compressors would be grouped together in screened enclosures on the Perry Building and the new Francisco Building, and would be located away from the roof perimeter to shield them from surrounding uses. The screen enclosure height would match the rooftop equipment height and be no more than 16 feet tall. In addition, about a third of the roof area would host a solar panel array that would meet Title 24 requirements for photovoltaic solar panels on building flat roof areas. The panels would have a tilt to optimize performance but would not be visible above the roof line.

The existing emergency backup diesel power generator, located adjacent to the Bay Street frontage just west of the Caretaker's Cottage, is above grade and would be replaced by a new Tier 4 emissions emergency backup diesel generator located inside the new Bay Building. The generator would be the same size and located in an interior generator room in the new Bay Building.. The existing electrical service transformer, currently located adjacent to the Bay Street frontage in the surface parking lot, would be replaced by a new transformer located to the west along the Bay Street frontage, north of the Julia Morgan Building's northwest corner. If permitted by Pacific Gas & Electric, the transformer would be recessed into the ground.

Figure 2-3 depicts the conceptual site plan for the proposed project. **Figures 2-4 through 2-7** depict the proposed floor plans for the basement, first level, and a representative upper floor, respectively. **Figure 2-8** depicts the roof plan. **Figures 2-9 and 2-10** depict the proposed building elevations. **Figures 2-11 and 2-12** depict sight line exhibits showing the existing conditions and conceptual project massing from various vantage points.

[8] A hyphen is an architectural technique to provide a physical link between an historic building and a newer building, while maintaining distinction between the new construction and the original.



LEGEND

- Project Area
- Building to be Renovated
- Minor Maintenance Only
- New Construction

N

0 25 50

FEET

SOURCE: HKS, Inc.

FIGURE 2-3

3400 Laguna Street Project

Proposed Site Plan

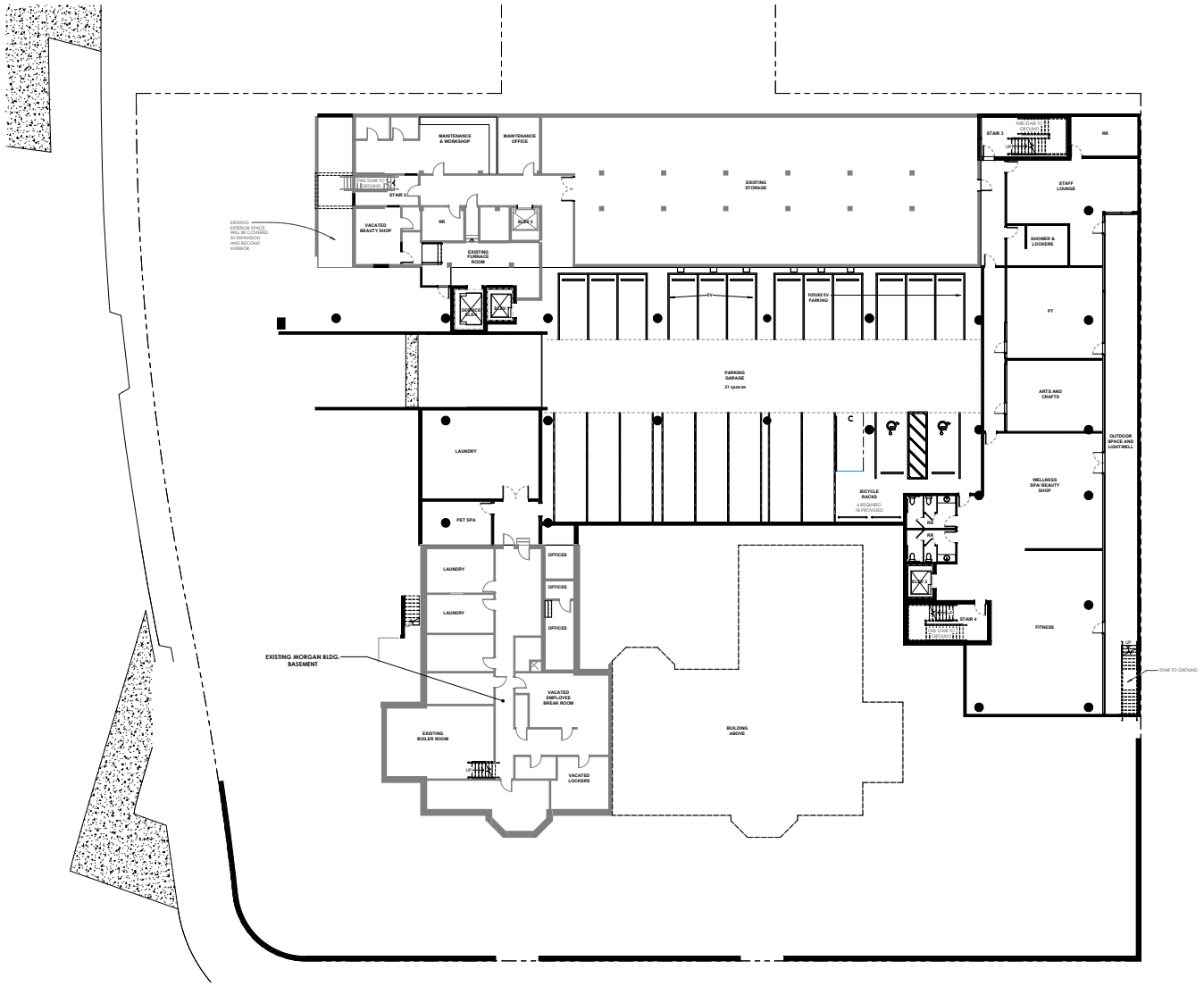


FIGURE 2-4

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Basement

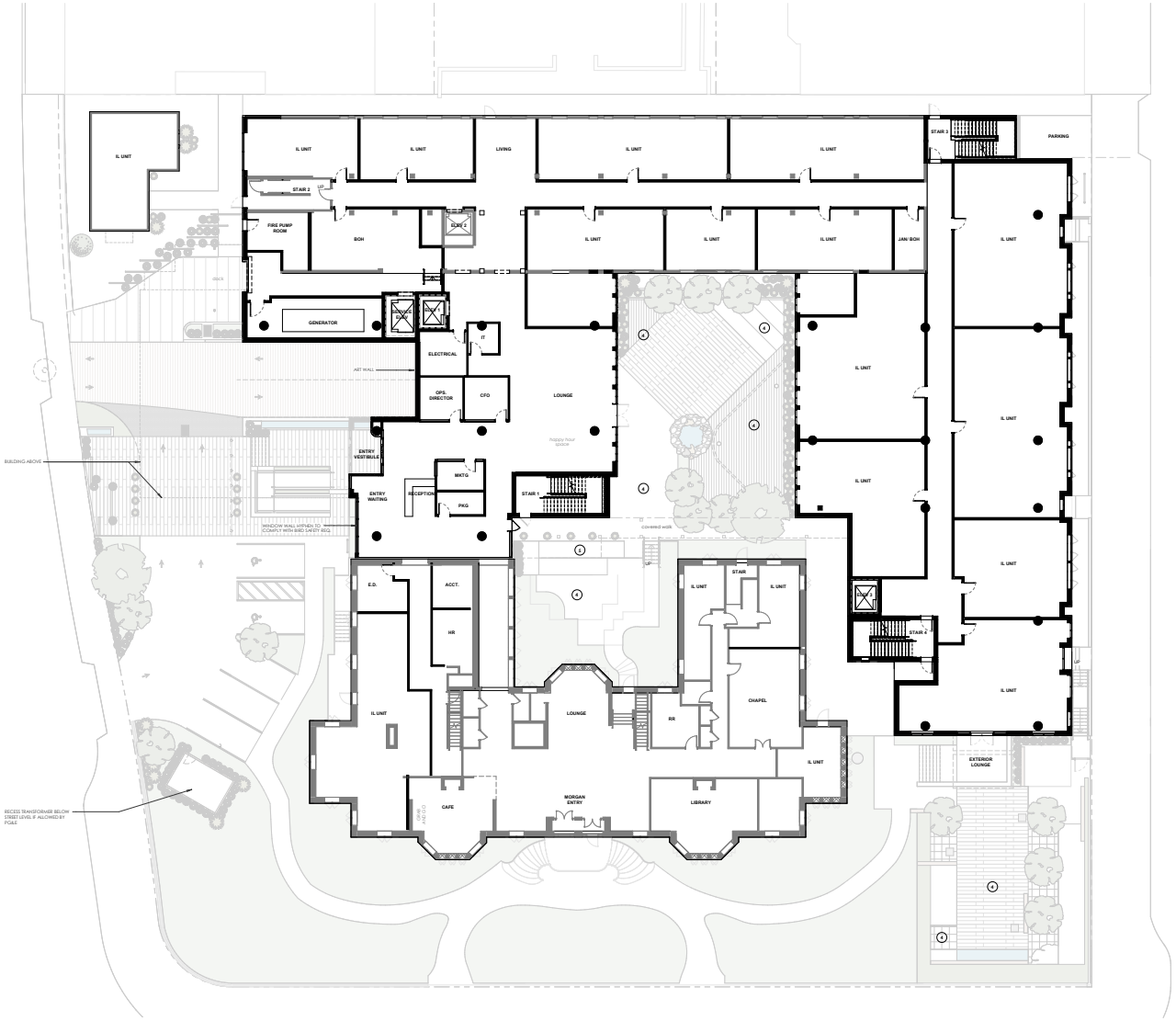


FIGURE 2-5

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 1

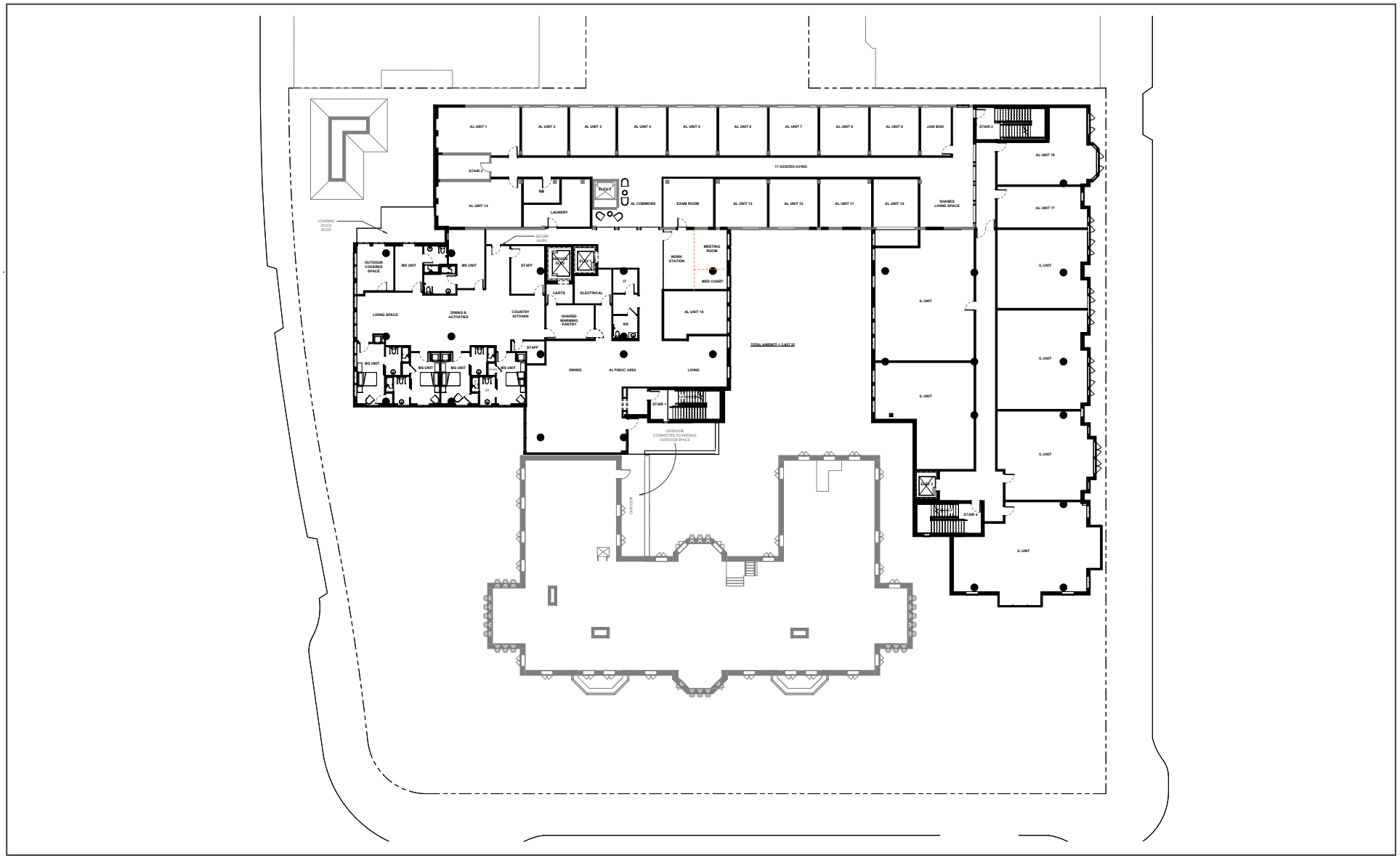


FIGURE 2-6

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 2

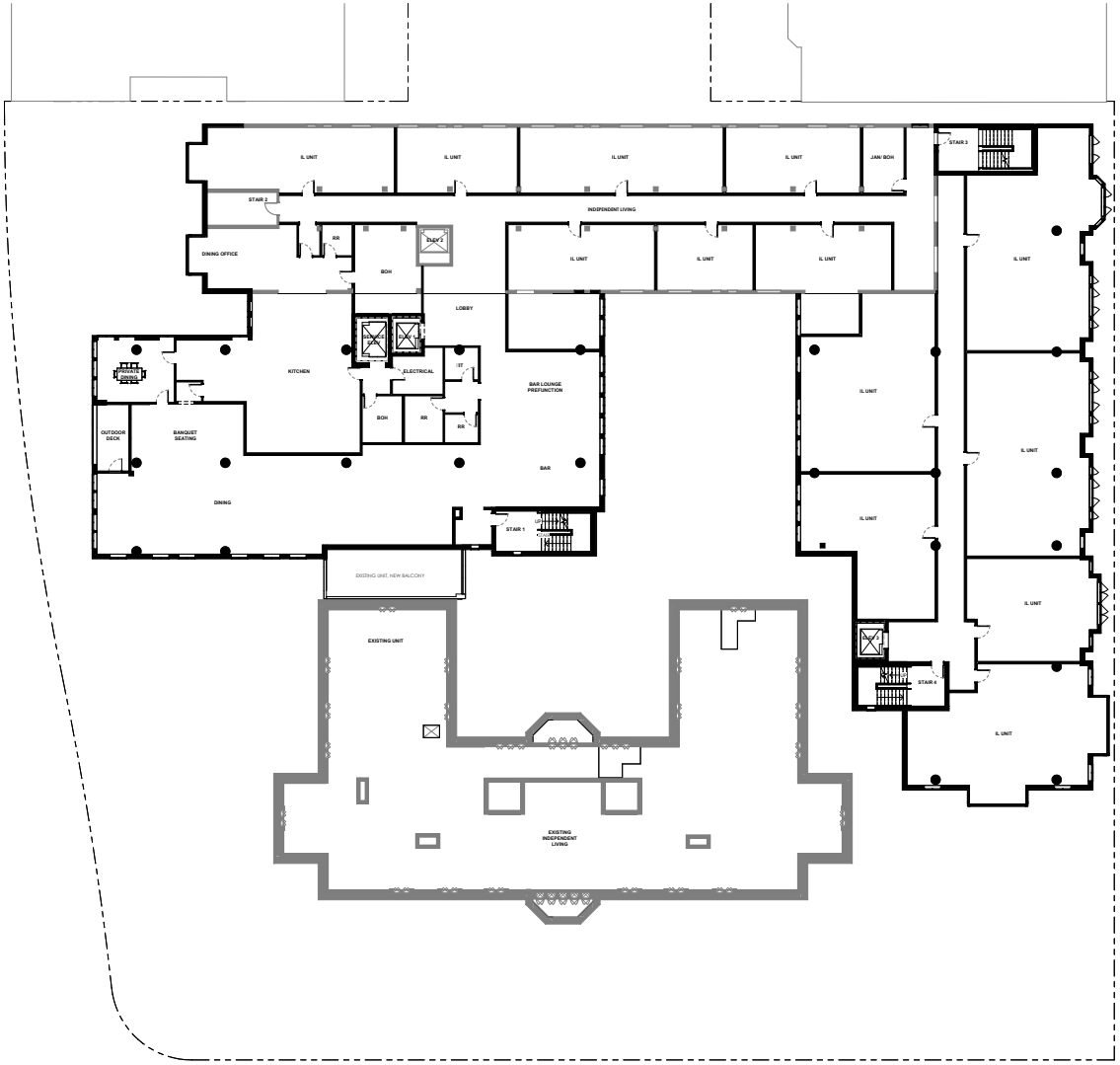


FIGURE 2-7

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 3

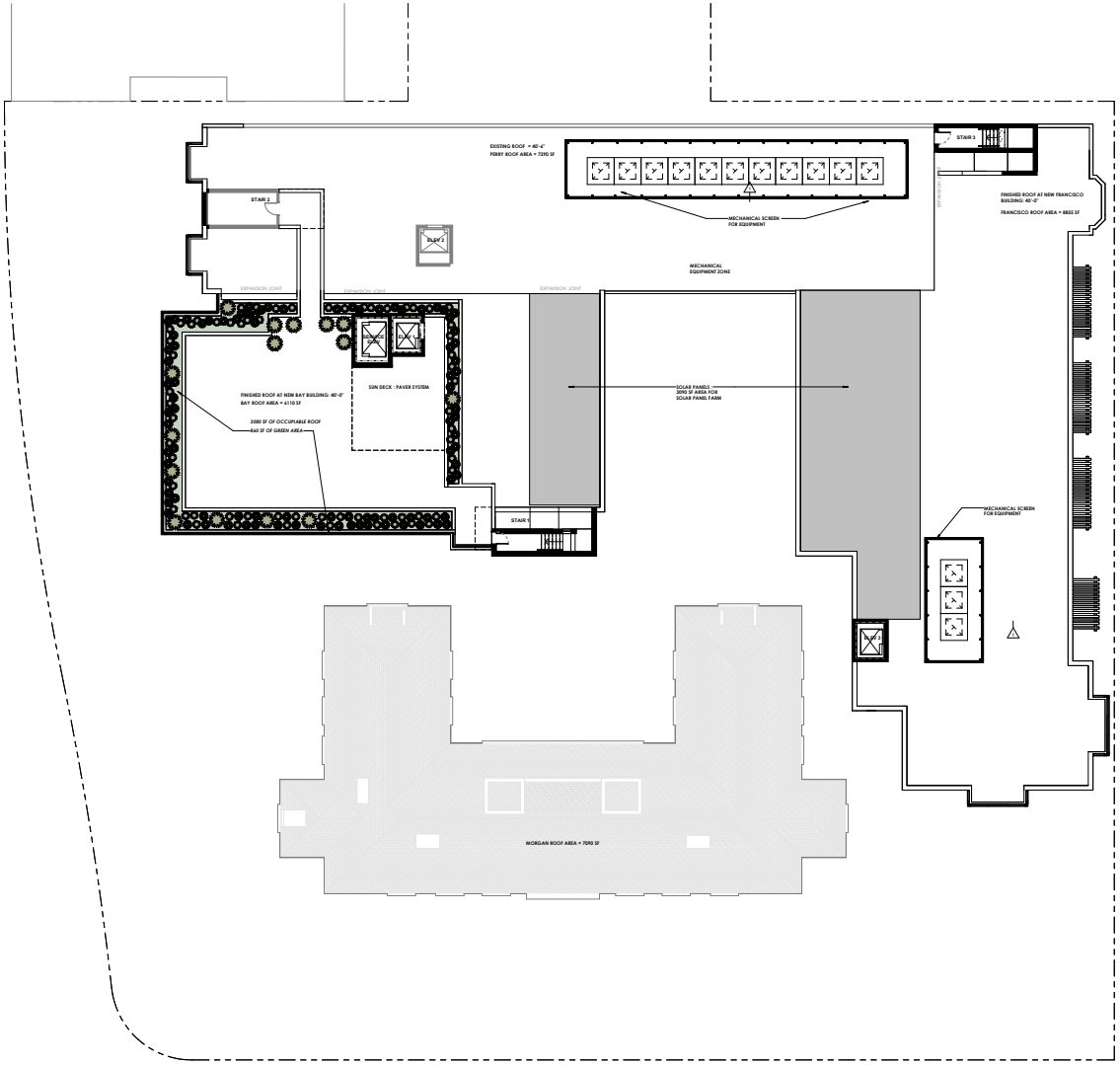


FIGURE 2-8

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Roof Level Plan

FIGURE 2-9

0 15 30
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – North and South

East Elevation

West Elevation

FIGURE 2-10

0 17.5 35
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – East and West

EXISTING

EXISTING

PROPOSED

PROPOSED

FIGURE 2-11

3400 Laguna Street Project

Existing Conditions and Proposed Project – Conceptual Sight Line Exhibits

SOURCE: HKS, Inc.

EXISTING

EXISTING

PROPOSED

PROPOSED

FIGURE 2-12

3400 Laguna Street Project

Existing Conditions and Proposed Project – Conceptual Sight Line Exhibits

SOURCE: HKS, Inc.

2.D.2 Proposed Renovations to Julia Morgan and Perry Buildings

The proposed project would include renovations to the interior and exterior of the Julia Morgan Building and the Perry Building. Within the Julia Morgan Building, the proposed project would reconfigure existing interior spaces to enable the addition of four new residential care suites and improve spaces for resident amenities, including conversion of the sitting room adjacent to the front lobby to a café-style dining area and conversion of the existing front office area into a sitting area, as the front office would be relocated to the new Bay Building. Refer to the floor plan depicted on Figure 2-5.

The proposed project has been designed to retain identified character-defining features[9] of the interior and exterior of the Julia Morgan Building and to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

All identified interior character-defining features on the first floor Main Lobby and Library area would be retained as part of the proposed interior alterations, including the following:

- Tile floor
- Central stairwell with trefoil railing
- Fireplace mantel
- Wood coffered ceiling

Externally, the proposed project would include renovations to the façade of the Julia Morgan Building, such as window repairs, fencing repairs including to the brick base, repointing[10] of bricks where needed, and roof repairs.[11] Specific work would include the following:

- Repair and reattachment of gutters and rain water leaders.
- Removal of staining and biological growth near existing rain water leaders.
- Repointing deteriorated and missing mortar joints in brick and terra cotta with mortar that matches color and composition of existing mortar.
- Crack repair in existing brick wall.
- Patching and painting of existing terra cotta glaze spalls to match original color and texture.
- Routing and sealing cracks in concrete foundation wall.
- Repairing existing wood and steel windows and doors (repairing, prepping and painting, removing and replacing cracked glazing putty, removing corrosion, and treating exposed metal). If any windows are found to be deteriorated beyond repair, replacement windows would be proposed that match the original in material and configuration.

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9 Character-defining features are essential physical features that enable the property to convey its historic identity. These distinctive character- defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible for national or state designation, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

10 Repointing refers to replacing and sealing failed joints (cracked or crumbled mortar that holds the bricks in place) with new mortar.

11 Page and Turnbull. 2024. 3400 Laguna Street Julia Morgan Building and Caretaker's Cottage Character Defining Features Memorandum. August 1.

- Repairing cracked and buckling pavers.
- Removing corrosion at existing perimeter fence and repainting with rust inhibitive coating.

Within the Perry Building, the proposed project would update the appearance of existing care suites to help modernize the facility and more substantially rework interior portions of the Perry Building that would adjoin the new Bay Building and the new Francisco Building. The proposed project also would include exterior additions to the existing Perry Building, at its north and south façades, to incorporate window openings.

No exterior or interior renovations, aside from maintenance work, are proposed to the existing Caretaker's Cottage. This building would be protected in place while construction activities occur on site.

2.D.3 Project Sustainability Features

The project site has existing electrical, natural gas, and telecommunications service from lines under the existing roads and surface parking lots. As the proposed project would include new construction, it would be required to comply with the City's All-Electric New Construction Ordinance. In addition, the proposed project would be required to comply with the standards of Title 24 and the San Francisco Green Building Code, requiring energy efficient infrastructure, renewable energy, and solar and living roofs. The proposed project would be designed and built to meet the requirements of LEED Silver, although there is currently no intent to seek formal LEED Certification.

2.D.4 Proposed Circulation, Parking, and Loading

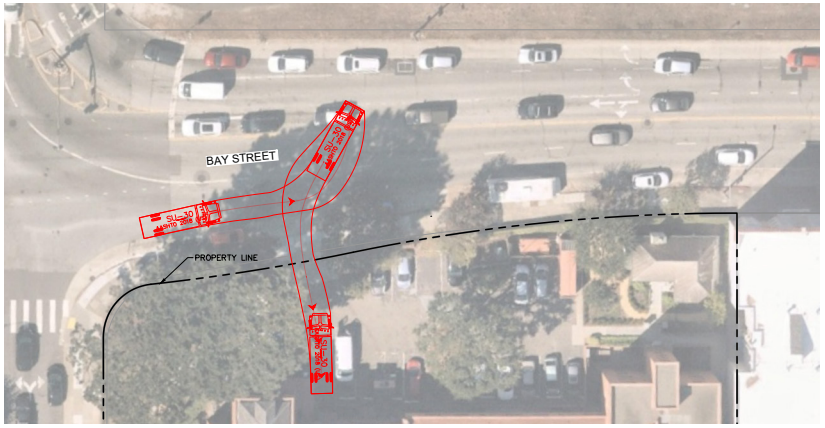
The proposed project would add two new bulb-outs per planning code section 138.1, Streetscape and Pedestrian Improvements. The first bulb-out would be installed at the intersection of Laguna and Bay streets and would project 6 feet into the Laguna and Bay streets rights-of-way. The bulb-out would extend to the existing curb cut on Bay Street. The second bulb-out would be installed at the intersection of Laguna Street and Francisco Street and would project 6 feet into the Laguna and Francisco street rights-of-way.

A new basement-level garage would be constructed beneath the proposed Bay and Francisco buildings and the existing interior courtyard; the garage would contain 31 vehicle parking spaces, including two ADA spaces, one car share space, and electric vehicle charging stations, as well as 18 class 1 bicycle parking spaces. A new two-directional, 20-foot-wide driveway off Bay Street would provide access to the new basement garage, east of the existing driveway entrance. Vehicles would be restricted to right-only turns into and out of the driveway. The new driveway and porte cochère would necessitate the removal of 17 existing off-street surface parking spaces and approximately 15 feet of on-street parking along Bay Street, for a total loss of one on-street parking space on Bay Street to accommodate the new curb cut. The existing driveway on Bay Street, west of the new driveway, would provide access to five off-street surface parking spaces. At this location, an approximately 20-foot-long, two-lane, off-street covered porte cochère would provide universal access required by the residential care facility, in compliance with the ADA. These modifications would allow pick-up and drop-off activities to occur on site and provide easier vehicular ingress and egress to the site.

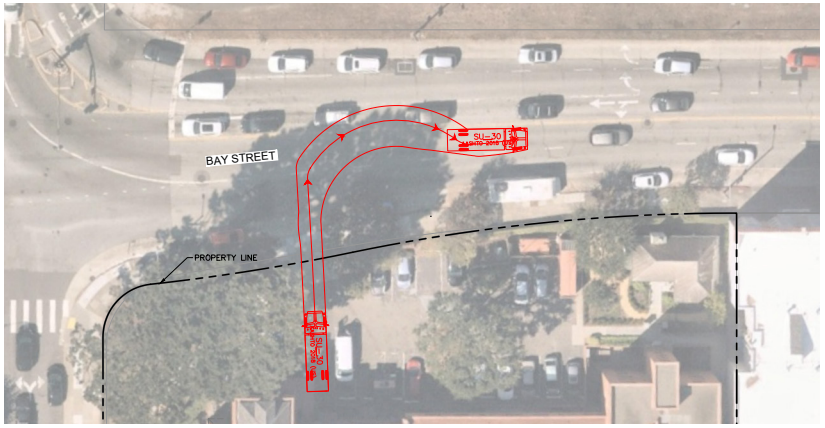
Loading access to the site would be modified such that smaller (30-foot or less) delivery vehicles would enter the site by approaching eastbound on Bay Street and backing into the service area via the

new 20-foot-wide driveway, temporarily blocking the sidewalk (via the curb cut) and driveway as they maneuver back in, but not once they have parked at the loading dock. Larger (40-foot) delivery trucks would enter the site by approaching westbound on Bay Street and backing directly into the loading dock from the street. Though these trucks would temporarily block the sidewalk (via the curb cut) and driveway as they maneuver back in, they would not block the sidewalk or curb cut once parked at the loading dock. All trucks would then depart by making a right turn eastbound onto Bay Street. The new curb cut for the loading dock would also be used for the driveway to the proposed basement-level parking garage. **Figures 2-13 and 2-14** show the existing and proposed loading entry and exits.

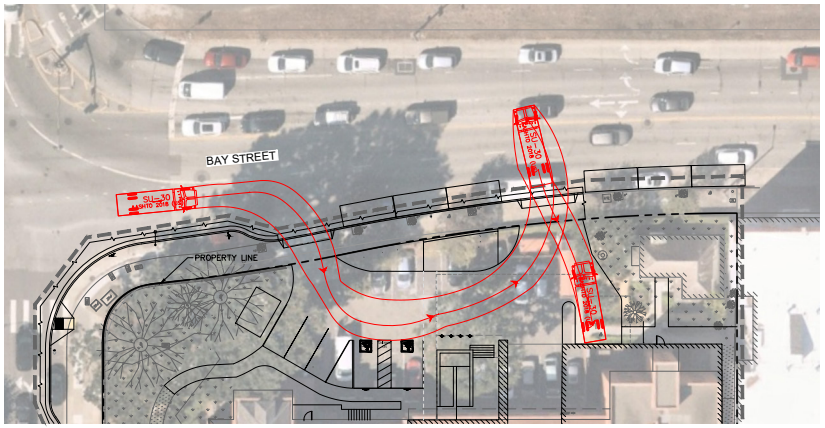
In total, the project would remove eight on-street parking spaces and would add 19 off-street parking spaces. The proposed project would add 12 Class 2 bicycle parking spaces in the public right-of-way (three located on Bay Street and nine located on Francisco Street); 18 Class 1 bicycle parking spaces in the proposed basement; and three Class 2 bicycle parking spaces on the surface parking lot.



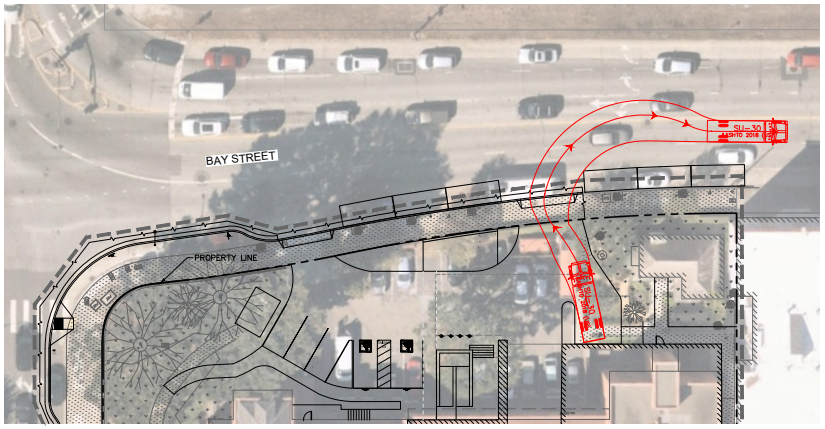
EXISTING LOADING ENTRY



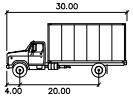
EXISTING LOADING DEPARTURE



PROPOSED LOADING ENTRY



PROPOSED LOADING DEPARTURE



SU–30

	feet
Width	: 8.00
Track	: 8.00
Lock to Lock Time	: 6.0
Steering Angle	: 31.8

VEHICLE DATA

SU-30 LOADING TRUCK
HERITAGE ON THE MARINA

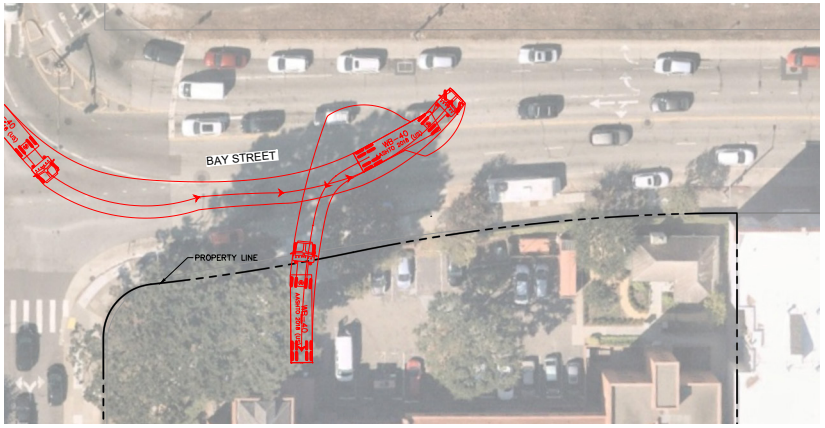
NOTE: SU-30 VEHICLE CURRENTLY USED FOR PRODUCE DELIVERIES WEEKLY ON FRIDAY.

FIGURE 2-13

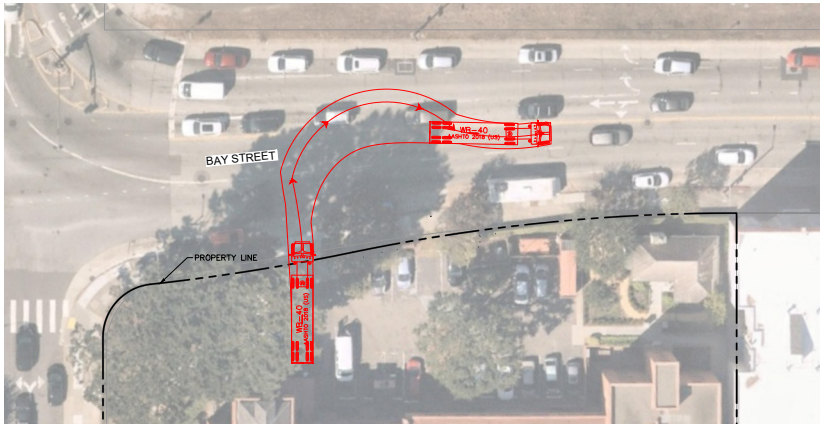
0 40 80
FEET

SOURCE: Kimley Horn

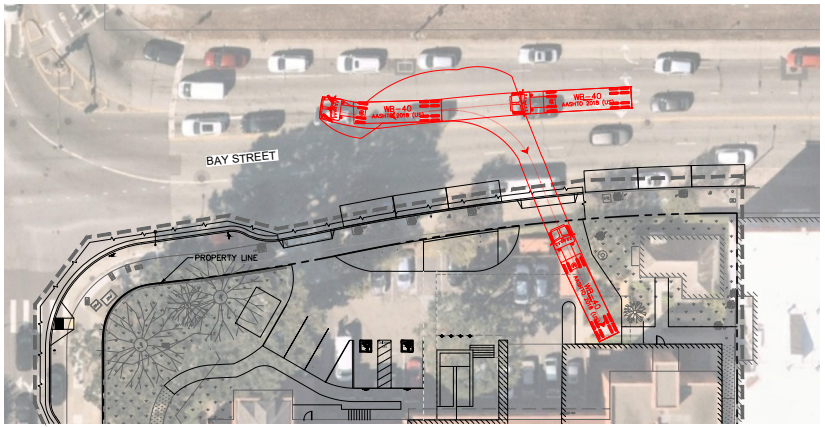
3400 Laguna Street Project
30-Foot Truck Entry and Departure



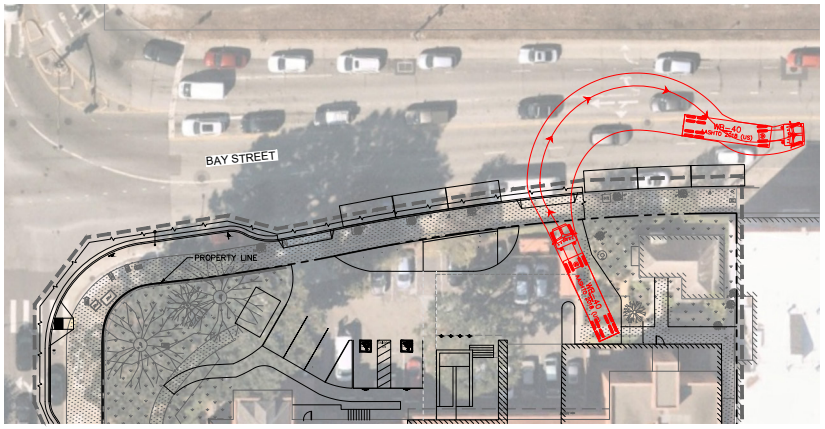
EXISTING LOADING ENTRY



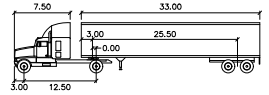
EXISTING LOADING DEPARTURE



PROPOSED LOADING ENTRY



PROPOSED LOADING DEPARTURE



WB-40

	feet		
Tractor Width	: 8.00	Lock to Lock Time	: 6.0
Trailer Width	: 8.00	Steering Angle	: 20.3
Tractor Track	: 8.00	Articulating Angle	: 70.0
Trailer Track	: 8.00		

VEHICLE DATA

WB-40 LOADING TRUCK
HERITAGE ON THE MARINA

NOTE: WB-40 VEHICLE CURRENTLY USED FOR DELIVERIES WEEKLY ON MONDAY AND THURSDAY.

FIGURE 2-14

N

0 40 80
FEET

SOURCE: Kimley Horn

3400 Laguna Street Project
40-Foot Truck Entry and Departure

2.D.5 Open Space and Landscaping

The project would increase usable open space at the project site from approximately 26,410 gross square feet to approximately 30,280 gross square feet. The proposed project would preserve the existing open lawn space in front of the Julia Morgan Building and in the courtyard to the rear of the project site. The proposed project would reconfigure the original central courtyard and reduce its size by approximately 1,400 square feet. On the roof of the new Bay Building, the project would add 3,549 square feet of occupiable open space and 940 square feet of green area.

The project site currently contains 62 trees on site, 25 of which would be removed for the project. The project would plant 34 new trees on the project site, for a net total of nine new trees. The project site contains one significant tree in the northwest corner of the property as designated per section 810a of the public works code, which would not be removed.

In addition, there are 14 street trees along the project frontage, including five existing street trees along the Bay Street frontage and nine trees along the Francisco Street frontage. There are currently no street trees along the project's Laguna Street frontage; the proposed project would plant six street trees along that frontage. The proposed project would remove one street tree along the Bay Street frontage and replace it nearby along the same frontage, in compliance with section 806 of the public works code, resulting in a net increase of six street trees.

2.D.6 Project Construction

Project construction would take approximately 29 months and is currently anticipated to occur between January 2027 and June 2029. The proposed new buildings would be constructed on mat foundations, and no impact or vibratory pile driving techniques would be used. The proposed project would require the excavation of 9,060 cubic yards of soil to a maximum depth of 15 feet below ground level. The total area of soil disturbance would be 29,750 square feet. Construction is scheduled to occur Monday through Friday, from 7:00 a.m. to 8:00 p.m. Nighttime construction is not required or proposed.

During demolition and construction, existing on-site residents would be relocated as necessary. According to the project sponsor, during construction, current site occupants would be provided with more frequent off-site outings including picnics, movies, shopping etc. In addition, the project sponsor would partner with local senior day use centers to support residents. The project sponsor indicated it would also consider renting a block of hotel rooms for current occupants to have quiet spaces and/or provide noise cancelling headphones to residents who would rather stay in their suites during these times.

A total of six occupied suites are within the two buildings that would be demolished. As the time for demolition approaches, the project sponsor would allow existing building occupancy to decrease so that residents whose suites would be demolished (six suites) or remodeled would be able to relocate to vacant suites to remain during construction. During later stages of construction, existing residents may be moved to new suites created or to other more recently vacated suites.

2.D.7 Project Approvals

Certification of the final EIR by the planning commission, which would be appealable to the board of supervisors, is required before any discretionary approvals or permits can be issued for the proposed project. The following is a preliminary list of the anticipated approvals required for the proposed project:

1. **Actions by the Historic Preservation Commission**
    a. Approval of a Certificate of Appropriateness for Article 10 Landmarked Historic Resources (planning code section 1006)[12]

2. **Actions by the Planning Commission**
    a. Approval of a Conditional Use Authorization (planning code sections 209.2 and 303)
    b. Approval of Planned Unit Development, including an exception to a rear yard requirement (planning code section 304)
    c. Adoption of CEQA findings, mitigation measures, and a Mitigation Monitoring and Reporting Program

3. **Actions by Other City Departments**
    a. Department of Building Inspection
        1) Review and approval of demolition, grading, and building permits/construction addendum
    b. San Francisco Public Works
        1) Approval of an encroachment permit or a street improvement permit for streetscape improvements
        2) Approval of a new curb cut on Bay Street
        3) Approval of removing a curb cut on Francisco Street
        4) Approval of the planting of street trees
        5) Approval for the removal of one existing street tree
    c. San Francisco Municipal Transportation Agency
        1) Approval of modifications to color curb designations for on-street parking and loading spaces, including:
            a) Reduction of red curb on Francisco Street to only what is required for fire hydrant access
            b) Removal of existing white passenger loading zone on the Francisco Street site frontage
            c) Single accessible stall and two passenger loading spaces on Laguna Street to be shifted north due to addition of the bulb-out

[12] Approval of a Certificate of Appropriateness would be required if, at the time of permit application, the project site is designated as an article 10 landmark (planning code section 1006) or while designation proceedings are pending for a specified period after resolution has been passed initiating designation or confirming nomination of designation (planning code section 1014).

2) Approval of construction within public right-of-way (e.g., bulb-outs and sidewalk extensions) to ensure consistency with the Better Streets Plan

3) Approval of a special traffic permit if sidewalk(s) are used for construction staging and pedestrian walkways are constructed in the curb lane(s)

d. San Francisco Public Utilities Commission (SFPUC)

1) Review and approval of stormwater design features, including a stormwater control plan, in accordance with the City's 2016 Stormwater Management Requirements and Design Guidelines
2) Review and approval of an erosion and sediment control plan, pursuant to the Construction Site Runoff Ordinance
3) Review and approval of water budget calculations for on-site water use per requirements of the Non-potable Water Ordinance
4) Review and approval of a Batch Wastewater Discharge Permit prior to any dewatering activities
5) Review and approval of the proposed project's landscape and irrigation plans per the Water Efficient Irrigation Ordinance and the SFPUC Rules and Regulations Regarding Water Service to Customers
6) Review and approval of the project site's surrounding photometrics per the SFPUC Streetlight Standards and Requirements

e. San Francisco Department of Public Health

1) Review and approval of a site mitigation plan, in accordance with San Francisco Health Code article 22A (Maher Ordinance)
2) Review and approval of a construction dust control plan, in accordance with San Francisco Health Code article 22B (Construction Dust Control Ordinance)
3) Review and approval of food service components of the proposed project's plans in accordance with the requirements for on-site food preparation and service within a residential care facility
4) Approval of an enhanced ventilation proposal per San Francisco Health Code Article 38

f. San Francisco Fire Department

1) Review and approval of a life safety and operation permit.

4. Actions by Other Government Agencies

a. Bay Area Air Quality Management District

1) Approval of any necessary air quality permits for installation, operation, and testing of individual air pollution sources, such as the proposed backup emergency diesel generator

CHAPTER 3 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

3.A Introduction to the Environmental Analysis

This chapter provides a project-level impact analysis of the potentially significant, physical environmental impacts of project implementation as described in Chapter 2, Project Description. Included in Chapter 3 are separate Sections 3.B and 3.C, each presenting the impact analysis for two key resource topics identified in the initial study, as described below. Sections 3.B and 3.C each includes descriptions of the environmental setting and regulatory framework; assessments of project impacts (i.e., off site, on site, construction-related, operational, direct, and indirect impacts, as applicable) and cumulative impacts; and identification of mitigation measures that would reduce or avoid identified significant environmental impacts. This impact overview section describes the scope of analysis in the initial study and EIR and explains the format and basis for the impact analysis for all resource topics, including the cumulative impact analysis for these topics. This section also provides a brief overview of the existing and cumulative setting. The overview is supplemented by the environmental and cumulative setting identified in each resource topic subsection (e.g., historic architectural resource setting).

3.A.1 Scope of Analysis

Initial Study

As described in Chapter 1, Introduction, the planning department determined that an EIR is required for the proposed project in compliance with the California Environmental Quality Act (CEQA) and published a Notice of Preparation (NOP) (Appendix A). As part of the preparation for the EIR, the planning department identified resource topics that could be adequately addressed in an initial study.

The initial study prepared for this EIR (Appendix B) concludes that many of the physical environmental impacts of the proposed project would result in no impact or less than significant impacts, and that mitigation measures agreed to by the project sponsor and required as conditions of approval of the proposed project would reduce most significant impacts to a less than significant level. CEQA does not require further assessment of a project's less than significant impacts or those that can be reduced to less than significant with mitigation; thus, those issues are not included in this chapter. The issues addressed in the initial study are listed below. Also shown are the corresponding initial study sections and abbreviations for each relevant resource topic in parentheses:

- Section E.2, Land Use and Planning (LU)
- Section E.3, Population and Housing (PH)
- Section E.4, Cultural Ressources (CR)
- Section E.5, Tribal Cultural Resources (TC)
- Section E.6, Transportation and Circulation (TR)
- Section E.7, Noise (NO)
- Section E.8, Air Quality (AQ)
- Section E.9, Greenhouse Gas Emissions (GG)

- Section E.10, Wind (WI)
- Section E.11, Shadow (SH)
- Section E.12, Recreation (RE)
- Section E.13, Utilities and Service Systems (UT)
- Section E.14, Public Services (PS)
- Section E.15, Biological Resources (BI)
- Section E.16, Geology and Soils (GE)
- Section E.17, Hydrology and Water Quality (HY)
- Section E.18, Hazards and Hazardous Materials (HZ)
- Section E.19, Energy (EN)

Refer to the initial study in Appendix B for a discussion and the impact analysis of the proposed project with respect to these resource topics.

EIR Topics
The resource topic areas addressed in this chapter of the draft EIR are listed below, along with the abbreviation for the resource topic in parentheses.

- Section 3.B, Historic Resources (CR)
- Section 3.C, Air Quality (AQ)

3.A.2 CEQA Standards of Adequacy

CEQA Guidelines section 15151 describes standards for the preparation of an adequate EIR. Specifically, the standards under section 15151 state:

- An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes into account environmental consequences.
- An evaluation of the environmental impacts of a project need not be exhaustive; rather, the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible.
- Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.

In practice, the preceding points indicate that EIR preparers should use a reasonable, professionally accepted methodology to assess impacts. This approach sometimes requires making reasonable assumptions using the best information available. In some cases, when information is limited, this draft EIR employs a "reasonable worst-case analysis" to identify the largest expected potential change from existing baseline conditions that the proposed project may create. This approach thus identifies the most severe impact that could occur, providing a conservative analysis of potential environmental impacts. The following sections provide an overview to the background and approach for the impact assessments that follow.

3.A.3 Scope and Organization of this Chapter

The resource topic areas addressed in this chapter of the draft EIR are listed below along with the following subsections:

- **Introduction:** This subsection includes a brief description of the types of impacts that are analyzed as well as a summary of the impacts that were scoped out in the initial study (e.g., impacts that were determined to result in a less than significant impact or no impact).

- **Regulatory Framework:** This subsection provides an overview of statutory and regulatory considerations that are applicable to the specific resource topic.

- **Environmental Setting**: This subsection presents a description of existing baseline physical conditions on the project site and in the surroundings at the time of issuance of the NOP, with enough detail and breadth to allow a general understanding of the environmental impacts of the proposed project.

- **Impacts and Mitigation Measures:** This subsection describes the physical environmental impacts (e.g., the changes to baseline physical environmental conditions) that could result from implementation of the proposed project, as well as any mitigation measures that could avoid, eliminate, or reduce identified significant impacts. The analysis includes construction and operation of the proposed project, as applicable. This subsection is further subdivided to discuss the following topics.

    - **Significance Criteria.** The discussion under this heading lists the criteria—specific to each resource topic—used to identify and determine significant environmental effects of the proposed project. Under CEQA, a significant effect is defined as a substantial or potentially substantial adverse change in the environment. The guidelines implementing CEQA direct that this determination be based on scientific and factual data, including the entire record for the project, and not on argument, speculation, or unsubstantiated evidence. The significance criteria used in this draft EIR are based on planning department guidance used to assess the severity of environmental impacts of the proposed project, and on CEQA Guidelines Appendix G, using the procedures set forth in San Francisco Administrative Code chapter 31.10.

    - **Approach to Analysis.** The discussion under this heading describes the general approach and methodology used to apply the significance thresholds in evaluating the impacts of the proposed project. The methodology for applying significance criteria provides the basis for the impact analysis, which could be either qualitative or quantitative, depending on the specific impact. The methodology identifies the applicable regulatory guidelines, thresholds, standards, or accepted professional practices or protocols to be used to assess construction, operational, and cumulative impacts, as applicable.

    - **Impact Evaluation.** The discussion under this heading evaluates the potential for the proposed project to result in significant adverse effects on the existing physical environment. The proposed project's impacts are presented as individually numbered impact statements (shown in boldface type) that address each significance criterion. Each impact statement is keyed to a subject area abbreviation (e.g., CR for Cultural Resources) and an impact number (e.g., 1, 2, 3) for a combined alphanumeric code (e.g., Impact CR-1, Impact CR-2). Thus, Impact CR-1 would be the first impact in the Cultural Resources section and discusses the effects of the proposed project in response to the first significance criterion. The impact statement

concludes with a significance determination (see descriptions below in Section 3.A.4, Significance Determinations).

Following each impact statement is a discussion that provides the analysis and rationale for the significance determination.

If the impact analysis concludes that an impact is significant, potentially feasible mitigation measure(s) are presented immediately following the impact analysis. CEQA Guidelines section 15126.4 directs preparers of an EIR to describe feasible measures that could minimize significant adverse impacts. Mitigation measures are developed to avoid, minimize, rectify, reduce, eliminate, or compensate for an impact resulting from project implementation. CEQA Guidelines section 15041 grants authority to the lead agency to require feasible changes in any or all activities involved in a project to substantially lessen or avoid significant effects on the environment. Pursuant to CEQA Guidelines section 15126.4, mitigation measures are not required for environmental impacts that are not found to be significant.

Feasible mitigation measures have been included in this chapter for specific environmental impacts, where applicable. The measures are indented and are numbered to correspond to the number of the impact analysis. For example, Mitigation Measure M-AQ-1a would be the first mitigation measure identified to address Impact AQ-1, Mitigation Measure M-AQ-1b would be a second mitigation measure identified for that impact, and so forth.

- **Cumulative Impacts.** The discussion under this heading considers the combined impacts of the proposed project and other closely related projects. A further description of cumulative impacts and other related projects is provided later in Section 3.A.5, Cumulative Impact Analysis.

3.A.4 Significance Determinations

A "significant effect" is defined by CEQA Guidelines section 15382 as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

The level of impact is indicated at the end of the impact statement based on the following terms:

- **No Impact:** This determination applies if there is no potential for impacts, or if the environmental resource does not occur in the project area or the area of potential effects.
- **Less Than Significant Impact:** This determination applies if the impact does not exceed the defined significance criteria or would be eliminated or reduced to a less than significant level through compliance with existing local, state, and federal laws and regulations. No mitigation is required for impacts determined to be less than significant.
- **Less Than Significant Impact with Mitigation:** This determination applies if implementation of the proposed project would or could result in a significant adverse effect, exceeding the defined

significance criteria, but feasible mitigation is available that would reduce the impact to a less than significant level.

- **Significant and Unavoidable with Mitigation:** This determination applies if implementation of the proposed project would result in a significant adverse effect that exceeds the defined significance criteria and—although the impact can be reduced through compliance with existing local, state, and federal laws and regulations, and/or implementation of feasible mitigation—the residual impact would still exceed the defined significance criteria. Thus, even with implementation of feasible mitigation, the impact would be significant and therefore unavoidable.
- **Significant and Unavoidable:** This determination applies if implementation of the proposed project would result in a significant adverse effect that exceeds the defined significance criteria, and there are no feasible mitigation measures. Therefore, the impact would be significant and unavoidable.

CEQA Guidelines section 15125 states that the "environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant." The environmental setting typically includes the existing physical conditions on the project site and vicinity at the time of NOP publication, including projects that are under construction. The environmental analysis then presents existing and existing-plus-project scenarios to identify environmental impacts that would occur from implementation of the proposed project.

3.A.5 Cumulative Impact Analysis

CEQA Requirements for Cumulative Impact Analysis

Cumulative impacts, as defined in CEQA Guidelines section 15355, refer to two or more individual effects that, when taken together, are "considerable" or that compound or increase other environmental impacts. A cumulative impact from several projects is the change in the environment that would result from the incremental impact of the project added to the impacts of other reasonably foreseeable future projects. Pertinent guidance for cumulative impact analysis is provided in CEQA Guidelines section 15130:

- An EIR shall discuss cumulative impacts of a project when the project's incremental effect is "cumulatively considerable" (i.e., the incremental effects of an individual project are considerable when viewed in connection with the effects of past, current, and probable future projects causing related impacts, including those outside the control of the agency, if necessary).
- An EIR should not discuss impacts that do not result in part from the project evaluated in the EIR.
- A project's contribution is less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.
- The discussion of impact severity and likelihood of occurrence need not be as detailed as for effects attributable to the project alone.
- The focus of analysis should be on the cumulative impact to which the identified other projects contribute, rather than on attributes of the other projects that do not contribute to the cumulative impact.

The cumulative impact analysis for each individual resource topic is described in each resource section immediately following the description of the direct project impacts and identified mitigation measures.

Approach to Cumulative Impact Analysis

Two approaches to a cumulative impact analysis are provided in CEQA Guidelines section 15130(b)(1):

- The analysis can be based on a list of past, present, and reasonably foreseeable future projects producing closely related impacts that could combine with those of a proposed project; or
- A summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts.

The analyses in this draft EIR and attached initial study employ a list-based approach and projections-based approach, depending on the environmental topic analyzed. The following factors were used to identify reasonably foreseeable future projects where the list-based approach is used:

- **Similar Environmental Impacts:** A relevant project contributes to effects on resources that are also affected by the proposed project. A relevant future project is defined as one that is "reasonably foreseeable," such as a proposed project for which an application has been filed with the approving agency or for which funding has been approved.
- **Geographic Scope and Location:** A relevant project is one located in the geographic area within which effects could combine. The geographic scope varies on a resource-by-resource basis. For example, because health risk impacts from exposure to air pollutants are generally localized, the cumulative context for health risk analysis is the project site and vicinity within 1,000 feet of the project site or the maximally exposed receptor. In contrast, the geographic scope for evaluating cumulative effects on regional air quality consists of the affected air basin (i.e., the San Francisco Bay Area Air Basin) and the summary of projections approach is used.
- **Timing and Duration of Implementation:** Effects associated with activities for a relevant project (e.g., short-term construction or demolition or long-term operations) would most likely coincide with the related effects of the proposed project.

Cumulative Environmental Setting

There is only one cumulative project that was considered in this EIR for environmental topics that use the list-based approach—the Marina Improvement and Remediation Project.[1] The nearest portion of the Marina Improvement and Remediation Project to the proposed project site is the northwest intersection of Marina Boulevard and Laguna Street, a distance of approximately 830 feet from the 3400 Laguna Street project site. The Marina Improvement and Remediation Project is described below. The timing of this cumulative project is unknown and it has not yet undergone review under CEQA. However, to provide a conservative analysis, this EIR assumes simultaneous construction of the 3400 Laguna Street Project and the Marina Improvement and Remediation Project.

- **Marina Improvement and Remediation Project:** Sponsored by the San Francisco Recreation and Parks Department (park department) and Pacific Gas & Electric, the project involves marina remediation and harbor improvements to the 35-acre marina located along the north waterfront between Laguna and Baker streets and extending south to Marina Boulevard, composed of East Harbor (Gashouse Cove) and West Harbor.

[1] San Francisco Recreation and Parks Department. n.d. Marina Improvement and Remediation Project. Website: https://sfrecpark.org/1160/Marina-Improvement-and-Remediation-Proje (accessed May 17, 2024).

The project includes demolition of existing docks/berths on the southern portion of East Harbor; dredging the northern half of East Harbor, to allow for placement of an engineered cap to address potential exposure pathways from hazardous subsurface sediments; and installation of permeable reactive barriers along the shoreline. The proposed clean-up actions would retain the existing sediment cover over contaminated sediments in the southern portion of East Harbor. Due to this, marina conditions would remain too shallow to continue use of existing berths; as such, the park department proposes to relocate those berths to deeper waters within the vicinity. The northern portion of East Harbor would remain a marina with the proposed re-construction of a portion of the slips. The proposal includes a new floating breakwater, designed to minimize sand deposition to reduce ongoing operations and maintenance dredging costs associated with excessive sand deposition. As of June 2024, the project design is undergoing revisions.

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3.B Historic Resources

3.B.1 Introduction

This section assesses the proposed project's potential impact on historic resources. It outlines the regulatory framework, describes the existing environmental setting as it relates to historic resources, identifies potential historic resources near the project site, evaluates potential direct and indirect impacts on historic resources that could result from project implementation, and identifies mitigation measures to reduce potential adverse impacts. Project-related impacts on archeological resources, human remains, and tribal cultural resources are addressed in Appendix B, Initial Study, of this draft environmental impact report (EIR).

As outlined in Chapter 1, Introduction, consistent with the requirements of CEQA Guidelines sections 15063 and 15082, the planning department twice circulated a Notice of Availability (NOA) of a Notice of Preparation (NOP) that an EIR would be prepared. Comments received on the NOPs related to cultural resources included concerns about the scale of the new buildings and their relationship to the Julia Morgan Building. Commenters stated concerns with how the proposed new buildings would reduce the views of the Julia Morgan Building due to their height. In addition, concerns were raised on how the new buildings would impact the architectural style of the Julia Morgan Building and whether they would detract from the historic nature of the building. Additionally, commenters expressed concern that the new buildings would diminish the green space in front of the Julia Morgan Building due to their proposed size. These comments are addressed in the discussion below, under Impact CR-1.

3.B.2 Definitions and Data Sources

A historic resource is defined in CEQA Guidelines section 15064.5(a) as one that is listed in, or determined to be eligible for listing in, the California Register of Historical Resources (California Register). In addition, a resource that (i) is identified as significant in a local register of historic resources, such as San Francisco Planning Code article 10, Preservation of Historical Architectural and Aesthetic Landmarks and/or article 11, Preservation of Buildings and Districts of Architectural, Historical, and Aesthetic Importance in the C-3 Districts, or (ii) is deemed significant due to its identification in a historic resources survey meeting the requirements of California Public Resources Code section 5024.1(g) is presumed to be a historic resource "unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant." CEQA section 21084.1 also permits a lead agency to determine that a resource constitutes a historic resource even if the resource does not meet the foregoing criteria. For the purposes of this analysis, the term historic resources is used to distinguish such resources from archeological resources, which may also be considered historic resources under CEQA. Archeological resources, including archeological resources that are potentially historic resources under CEQA Guidelines section 15064.5, are addressed in the initial study (see Appendix B).

Unless otherwise noted, the historic architectural resources analysis included in this section is generally based on the Historic Resource Evaluation (HRE) prepared by an independent historic architectural resource consultant (Page and Turnbull) and the Historic Resource Review (HRR)

provided by the City of San Francisco Planning Department.[1,2] The HRE and HRR are included as Appendix C.

In addition, this section includes several descriptions of the structures located on the project site, like the Julia Morgan Building and the Caretaker's Cottage. When the project site is evaluated as a whole it is referred to as "3400 Laguna Street" to identify the project site's eligibility as a historic resource in addition to the individual on-site structures.

3.B.3 Regulatory Framework

The following section summarizes the plans and policies of federal, state, and local agencies that have regulatory oversight over historic resources within the project area.

Federal Regulations

Although the proposed project is not anticipated to require compliance with section 106 of the National Historic Preservation Act, the federal guidelines related to the treatment of cultural resources are relevant for the purposes of determining whether cultural resources, as defined under CEQA, are present and guiding the treatment of such resources. The sections below summarize the relevant federal regulations and guidelines.

National Historic Preservation Act

The National Historic Preservation Act of 1966 was passed primarily to acknowledge the importance of protecting our nation's heritage from rampant federal development. The National Historic Preservation Act:

- Sets the federal policy for preserving our nation's heritage;
- Establishes a federal-state and federal-tribal partnership;
- Establishes the National Register of Historic Places (National Register) and National Historic Landmarks Programs;
- Mandates the selection of qualified State Historic Preservation Officers;
- Establishes the Advisory Council on Historic Preservation;
- Charges federal agencies with responsible stewardship; and
- Establishes the role of Certified Local Governments within the states.

While the National Historic Preservation Act sets federal policy for historic preservation, the actual regulations can be found in 36 Code of Federal Regulations part 800, Protection of Historic Properties. This section provides guidelines on how to follow the policy set forth in the National Historic Preservation Act.

National Register of Historic Places

The National Register is the nation's official comprehensive inventory of historic resources. Administered by the National Park Service, the National Register includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archeological, or cultural significance at the national, state, or local level. Typically, a resource that is more than 50 years of age

[1] Page and Turnbull. 2023. 3400 Laguna Street Historic Resource Evaluation, Part 1 – Revised, Prepared for the San Francisco Planning Department. February 16.

[2] San Francisco Planning Department. 2024. Historic Resource Review for 3400 Laguna Street. February 27.

is eligible for listing in the National Register if it meets any one of the four eligibility criteria and retains sufficient historical integrity. A resource less than 50 years old may be eligible if it can be demonstrated that it is of "exceptional importance" or a contributor to a historic district. National Register criteria are defined in National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation.[3]

A structure, site, building, district, or object would be eligible for listing in the National Register if it can be demonstrated that it meets at least one of the following four evaluative criteria:

- **Criterion A (Event):** Properties associated with events that have made a significant contribution to the broad patterns of our history;
- **Criterion B (Person):** Properties associated with the lives of persons significant in our past;
- **Criterion C (Design/Construction):** Properties that embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant distinguishable entity whose components lack individual distinction; and
- **Criterion D (Information Potential):** Properties that have yielded, or may be likely to yield, information important in prehistory or history.

Although there are exceptions, certain kinds of resources are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties that have achieved significance within the past 50 years.

In addition to meeting at least one of the four criteria, a property or district must retain integrity, meaning that it must have the ability to convey its significance through the retention of seven aspects, or qualities, that in various combinations define integrity:

- **Location:** Place where the historic property was constructed;
- **Design:** Combination of elements that create the form, plans, space, structure, and style of the property;
- **Setting:** The physical environment of the historic property, inclusive of the landscape and spatial relationships of the buildings;
- **Materials:** 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:** Physical evidence of the crafts of a particular culture or people during any given period in history;
- **Feeling:** The property's expression of the aesthetic or historic sense of a particular period of time; and
- **Association:** Direct link between an important historic event or person and an historic property.

[3] U.S. Department of the Interior, National Park Service. 1997. National Register Bulletin. Website: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf (accessed April 15, 2024).

Properties that are listed in the National Register, as well as properties that are formally determined to be eligible for listing in the National Register, are automatically listed in the California Register and, therefore, considered historic resources under the California Environmental Quality Act (CEQA).[4]

The Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (Secretary's Standards) were published and codified as 36 Code of Federal Regulations part 68 in 1995 and updated in 2017[5] The Secretary's Standards for rehabilitation have been adopted by local government bodies across the country, including the City and County of San Francisco, for reviewing proposed work on historic properties under local preservation ordinances. The Secretary's Standards provide a useful analytical tool for understanding and describing the potential impacts of changes to historic resources and are used to inform CEQA review. Developed by the National Park Service for reviewing certified rehabilitation tax credit projects, the rehabilitation standards provide guidance for reviewing work on historic properties. The rehabilitation standards are as follows:

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.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
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.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
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.
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.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
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 will be

[4] California Code of Regulations, Title 14, Chapter 11.5, section 4851, Historical Resources Eligible for Listing in the California Register of Historical Resources. n.d. Website: https://casetext.com/regulation/california-code-of-regulations/title-14-natural-resources/division-3-department-of-parks-and-recreation/chapter-115-california-register-of-historical-resources/section-4851-historical-resources-eligible-for-listing-in-the-california-register-of-historical-resources (accessed April 15, 2024).

[5] U.S. Department of the Interior, National Park Service (Kay D. Weeks and Anne E. Grimmer). n.d. The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstruction Historic Buildings, revised 2017. Website: https://www.nps.gov/orgs/1739/secretary-standards-treatment-historic-properties.htm (accessed April 15, 2024).

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.

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.

Conformance with all rehabilitation standards does not determine whether a project would cause a substantial adverse change in the significance of a historic resource under CEQA. Rather, projects that comply with the standards benefit from a regulatory presumption that they would have a less than significant adverse impact on a historic resource. Projects that do not comply with the rehabilitation standards may or may not cause a substantial adverse change in the significance of a historic resource and would require further analysis to determine whether the historic resource would be "materially impaired" by the project under CEQA Guidelines section 15064.5(b).

State Regulations

California implements the National Historic Preservation Act through its statewide comprehensive cultural resource preservation programs. The California Office of Historic Preservation, an office of the California Department of Parks and Recreation, implements the policies of the National Historic Preservation Act on a statewide level. The California Office of Historic Preservation also maintains the California Historical Resources Inventory. The State Historic Preservation Officer is an appointed official who implements historic preservation programs within the state's jurisdiction.

California Register of Historical Resources

The California Register, administered by the California Office of Historic Preservation, is the authoritative guide to historical and archeological resources that are significant within the context of California's history. Criteria for eligibility for inclusion in the California Register are based on and correspond to the National Register criteria. Certain resources are determined under CEQA to be automatically included in the California Register, including California properties formally eligible for or listed in the National Register. These resources are considered historic resources by the San Francisco Planning Department (planning department) for the purposes of CEQA. The evaluative criteria used for determining eligibility for listing in the California Register closely parallel those developed by the National Park Service for the National Register but include relevance to California history. To be eligible for listing in the California Register as a historic resource, a resource must meet at least one of the following criteria (Public Resources Code section 5024.1(c)):

- **Criterion 1 (Event):** Resources 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;
- **Criterion 2 (Person):** Resources that are associated with the lives of persons important to local, California, or national history;
- **Criterion 3 (Design/Construction):** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possesses high artistic values; or
- **Criterion 4 (Information Potential):** Resources that have yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

As with the National Register, a significant historic resource must possess integrity in addition to meeting the significance criteria in order to be considered eligible for listing in the California Register. Consideration of integrity for evaluation of California Register eligibility follows the definitions and criteria defined in the National Register Bulletin Number 15: How to Apply the National Register Criteria for Evaluation.[6]

California Environmental Quality Act

CEQA, as codified in Public Resources Code section 21000 et seq. and implemented by the CEQA Guidelines (14 CCR section 15000 et seq.), is the principal statute governing environmental review of projects in California. As stated above, CEQA defines a historic resource as a property listed in, or eligible for listing in, the California Register; included in a qualifying local register; or determined by the lead agency to be historically significant. In order to be considered a historic resource, a property is generally at least 50 years old; when acting as the CEQA lead agency, the planning department uses a threshold of 45 years. As noted above, "historic resource" is defined in CEQA Guidelines section 15064.5 as a cultural resource (i.e., a built-environment resource, archeological resource, or human remains) that meets at least one of the following criteria:

1. A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register.
2. A resource included in a local register of historic resources, as defined in Public Resources Code section 5020.1(k) or identified as significant in a historic resource survey meeting the requirements of Public Resources Code section 5024.1(g), 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 a historic 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.
4. The fact that a resource is not listed in, or determined to be eligible for listing in the California Register, not included in a local register of historic resources (pursuant to Public Resources Code section 5020.1(k)), or identified in a historic resources survey (meeting the criteria in Public Resources Code section 5024.1(g)) does not preclude a lead agency from determining that the resource may be a historic resource as defined in Public Resources Code section 5020.1(j) or 5024.1.

Therefore, under the CEQA Guidelines, even if a resource is not included in any local, state, or federal register, or identified in a qualifying historic resources survey, a lead agency may still determine that any resource is a historic resource for the purposes of CEQA if there is substantial evidence supporting such a determination. A lead agency must consider a resource to be historically significant if it finds that the resource meets the criteria for listing in the California Register.

[6] U.S. Department of the Interior, National Park Service, National Register Bulletin, 1997, https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf, accessed April 15, 2024

CEQA requires a lead agency to determine if a proposed project would have a significant effect on important historic resources or unique archeological resources. If a resource is neither a unique archeological resource nor a historic resource, the CEQA Guidelines note that the effects of the project on that resource shall not be considered a significant effect on the environment (CEQA Guidelines section 15064.5(c)(4)). As noted above, projects that comply with the Secretary's Standards benefit from a regulatory presumption under CEQA that they would have a less-than-significant impact on a historic resource. Projects that do not comply with the Secretary's Standards may or may not cause a substantial adverse change in the significance of a historic resource and must be subject to further analysis to assess whether they would result in material impairment of a historic resource's significance.

Local Regulations, Plans, and Policies

San Francisco General Plan

The San Francisco General Plan (general plan) Urban Design, Recreation and Open Space, and Housing elements address issues related to historic preservation by providing policies that emphasize preservation of notable landmarks and historic features, remodeling older buildings, and respecting the character of older buildings adjacent to new development. Policies in the general plan relevant to historic resources are identified below.

Urban Design Element

The Urban Design Element of the general plan includes the following policies related to historic preservation:

- **Policy 2.4:** Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.
- **Policy 2.5:** Use care in remodeling of older buildings in order to enhance rather than weaken the original character of such buildings.
- **Policy 2.6:** Respect the character of older development nearby in the design of new buildings.

Recreation and Open Space Element

The Recreation and Open Space Element includes the following policies related to historic preservation:

- **Policy 1.12:** Preserve historic and culturally significant landscapes, sites, structures, buildings, and objects.
- **Policy 1.13:** Preserve and protect character-defining features of historical resources in City parks when it is necessary to make alterations to accommodate new needs or uses.

Housing Element

The Housing Element includes the following policies related to historic preservation:

- **Policy 42:** Support cultural uses, activities, and architecture that sustain San Francisco's diverse cultural heritage.

San Francisco Planning Code

The City's commitment to historic preservation is codified in San Francisco Planning Code section 101.1(b), General Plan Consistency and Implementation, which establishes eight general plan priority policies. Priority Policy 7 of planning code section 101.1(b) addresses the City's desire to preserve landmarks and historic buildings and states "that landmarks and historic buildings be preserved."

San Francisco Historic Preservation Commission and Planning Code Articles 10 and 11

The San Francisco Historic Preservation Commission (HPC) is a seven-member body that makes recommendations directly to the San Francisco Board of Supervisors regarding the designation of landmark buildings, historic districts, and significant buildings. The HPC approves certificates of appropriateness for individual landmarks and landmark districts designated under article 10 and permits to alter for individual properties and conservation districts listed under article 11. The HPC reviews and comments on CEQA documents for projects that affect historic resources as well as projects that are subject to review under National Historic Preservation Act Section 106.

The San Francisco Charter gives the HPC the ability to identify, designate, and protect historic landmarks, including buildings, sites, objects, and districts, from inappropriate alterations. Article 10 of the planning code contains regulations regarding the way the HPC exercises its authority. Since the adoption of article 10 in 1967, the City has designated 292 landmark sites and 14 historic districts under article 10[7]. Any property that has been locally designated as an article 10 landmark or a contributor to an article 10 district is considered a historic resource for purposes of CEQA. In the mid-1970s, San Francisco Architectural Heritage (later renamed San Francisco Heritage) undertook the completion of a survey of resources found in the City's downtown area. The findings of the downtown survey served as the genesis of the book Splendid Survivors: San Francisco's Downtown Architectural Heritage, which resulted in the creation of the City's Downtown Plan and planning code article 11, which was adopted in 1985.[8] Article 11 contains an adopted local register of historic resources in the C-3 (Downtown) district. Under Article 11, category I and II buildings are buildings that are "judged to be Buildings of Individual Importance"; category III and IV buildings are called out as "Contributory Buildings"; both are presumed to be "historical resources." Article 11 contains designated conservation districts, which are also presumed significant. Any construction within a conservation district will be evaluated to determine its effect on the district as the "historical resource." Interiors of article 11 buildings are also "historical resources" if the designating ordinance calls out the interior as a feature that should be preserved.[9]

None of the buildings on the project site are currently article 10 landmarks and the project site is not located in an article 10 historic district. However, in March 2024, the department received a community-initiated article 10 landmark designation nomination for the site. On May 15, 2024, the HPC held a hearing regarding the landmark designation nomination and instructed staff to add the site to the landmark designation work program. On August 21, 2024, the Historic Preservation

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7 City and County of San Francisco. 2019. Article 10: Preservation of Historical Architectural and Aesthetic Landmarks, https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_planning/0-0-0-27871, accessed March 22, 2024.

8 San Francisco Planning Department, San Francisco Preservation Bulletin No. 10: Historic and Conservation Districts in San Francisco, 2003, https://sfplanning.org/sites/default/files/documents/preserv/bulletins/HistPres_Bulletin_10.PDF, p.4,=, accessed April 15, 2024.

9 San Francisco Planning Department, San Francisco Preservation Bulletin No. 16: CEQA Review Procedures for Historic Resources, n.d., https://sfplanning.org/sites/default/files/documents/preserv/bulletins/HistPres_Bulletin_16.PDF, p.4,, accessed April 15,, 2024.

Commission recommended initiation of the Landmark Designation per article 10 (planning code section 1006).[10] At the time of publication of the draft EIR, the nomination will require one additional hearing at the Historic Preservation Commission before being sent to the Board of Supervisors to review and approve the Landmark Designation.

Cultural District Initiative

A cultural district is a geographic area or location within San Francisco that embodies a unique cultural heritage. Cultural heritage is defined as containing a concentration of cultural and historic assets, culturally significant enterprise, arts, services, or businesses, and a significant portion of its residents or people who spend time in the area are members of a specific cultural community or ethnic group that historically has been discriminated against, displaced, or oppressed. Through a formalized, collaborative partnership between the City and communities, the mandate requires that the City coordinate resources to assist in stabilizing vulnerable communities facing, or at risk of, displacement or gentrification. If achieved, this will enable individuals, families, and the businesses that serve and employ them, as well as nonprofit, community arts, and educational institutions to live, work, and prosper within the City. Each cultural district is led by a community-based group with an executive director and advisory body and is expected to maintain a robust community engagement and communication effort.[11]

Currently, cultural districts include: Japantown Cultural District, Calle 24 Latino Cultural District (in the Mission District), SoMa Pilipinas Filipino Cultural Heritage District, Compton's Transgender Cultural District (in the Tenderloin), Leather and LGBTQ Cultural District (in the South of Market Area), African American Arts and Cultural District (in the Bayview), Castro LGBTQ Cultural District, American Indian Cultural District (in the Mission District), and Sunset Chinese Cultural District.

Cultural districts are not considered to be historic districts or historic resources for the purposes of CEQA; however, the existence of a cultural district suggests the increased likelihood that culturally associated historic resources are present within the cultural district boundaries.

Relative to the project site, the nearest cultural district is the Japantown Cultural District, approximately one mile to the south.

Legacy Business Registry

In March 2015, the Board of Supervisors approved Ordinance No. 29-15, amending the administrative code to direct the Small Business Commission to establish a Legacy Business Registry. The Legacy Business Registry works to save longstanding, community-serving businesses that so often serve as valuable cultural assets. The City intends that the registry be a tool for providing educational and promotional assistance to legacy businesses to encourage their continued viability and success. In November 2015, voters approved Local Measure J, establishing the Legacy Business Historic Preservation Fund. Measure J also expanded the definition of a legacy business to include those that

[10] San Francisco Historic Preservation Commission, Resolution 1416, Ladies' Protection and Relief Society Landmark Designation Initiation, August 21, 2024.

[11] San Francisco Planning Department, "Cultural Districts Initiative," San Francisco's Community Stabilization | Cultural Districts Initiative (sfplanning.org) accessed March 22, 2024

have operated in San Francisco for more than 20 years, are at risk of displacement, and meet all other requirements of the registry.[12]

While it may occupy a building that is considered to be a historic resource, a legacy business on its own is not considered to be a historic resource for the purposes of CEQA.

Relative to the project site, the nearest legacy businesses are located in Fort Mason and include San Francisco Camerawork, Greens Restaurant, St. John Coltrane Church, FLAX art & design, and Blue Bear School of Music.

3.B.4 Environmental Setting

The approximately 68,090-square-foot[13] (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna and Bay streets intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The project site slopes upward from west to east from approximately 30 to 40 feet above mean sea level. The project site has been occupied by Heritage on the Marina (originally established as the San Francisco Ladies' Protection and Relief Society in 1853) residential care retirement community since 1925. Heritage on the Marina consists of four interconnected structures, the Julia Morgan Building, the Perry Building, the Perry Building Connecter, and the Health Center, and one additional freestanding structure, the Caretaker's Cottage, with all structures on site totaling approximately 83,200 gross square feet.

The Julia Morgan Building was constructed in the Jacobethan Revival style by architect of merit Julia Morgan for the Ladies' Protection and Relief Society in 1925. The Julia Morgan Building is a three-story brick building with a U-shaped plan consisting of a central volume and north and south wings extending from the east façade and projections at the north and south elevations. The building has a hipped roof covered in slate shingles and a regular arrangement of dormers and three prominent brick chimneys. The building is unified in its appearance with decorative terracotta detailing that is visible in the arched window surrounds, on the second story cornice line, above the canted first floor bays, and on the engaged columns of the main entrance. The Julia Morgan Building has a highly symmetrical primary façade that faces west towards Laguna Street and features seven bays arranged around a centered gable parapet. Two canted one-story bays frame the main entrance to the building, which is itself centered below a projecting second story canted bay window. The double arched door surround is the main entrance to the building and is embellished with the same terracotta detailing found on the rest of the façade. The Julia Morgan Building's primary façade has a generous setback that contains an ornamental lawn with symmetrical curvilinear pathways that lead to the primary entrance. A low brick base with a simple iron fence frames the lawn and wraps around the north and south boundaries of the property.

The Julia Morgan Building is interconnected to three structures on the site: the Perry Building, the Perry Building Connector, and the Health Center. The northwest rear elevation of the Julia Morgan Building connects with the two-story rectangular Perry Building Connecter constructed in 1957 that

[12] San Francisco Planning Department, "Cultural Heritage," https://sfplanning.org/cultural-heritage, accessed December 22, 2021

[13] All square footages are approximate and rounded to the nearest multiple of ten.

runs parallel to Bay Street. The Perry Building Connecter in turn connects to the four-story Perry Building also constructed in 1957 that runs north south along the eastern end of the property. Lastly, the one-story Health Center constructed in 1963 and 1987 connects with the Perry Building towards the southeast and runs along Francisco Street.

There is one other building on the site, the freestanding one-story stone Caretaker's Cottage constructed in 1928-1929, located in the northeast corner of the site just north of the Perry Building. The Caretaker's Cottage has an "L" plan and is constructed of coursed roughly dressed ashlar stone with a steeply pitched hipped roof covered in asphalt shingles and a prominent stucco-clad tapered chimney along the north façade. The primary façade faces south and contains a centered four-lite wood Dutch door flanked by paired casement windows. The right (east) portion of the façade is the building's ell, which projects forward approximately six feet and contains two paired casement windows. The west elevation features a projecting flat roofed glazed box bay window with a stucco base and fixed divided lite windows. The north elevation contains the chimney and a single casement window while the east façade contains a single casement window. The Caretaker's Cottage is partially obscured from the street by the iron fence that runs along the property boundaries and is covered in a hedge along Bay Street near the northeast corner of the site. The iron fence continues on the interior of the site to create a small enclosure landscaped with a lawn and low shrubs. An iron and wood fence gate with stone pediments provides access to the Caretaker's Cottage from within the site.

There are three prominent landscaped areas on the site: the front lawn, center courtyard, and the rear courtyard. As mentioned above, the front lawn is located along Laguna Street and creates a generous setback for the primary façade of the Julia Morgan Building. The central courtyard is a paved and landscaped courtyard located in the center of the site framed by the rear elevations of the Julia Morgan Building, the Perry Building and Perry Building Connector, and the Health Center. East of the Perry Building is the rear courtyard that is made up of the rear yards of the adjacent properties to the east. None of the landscaped areas are accessible to the public and are only available for use by Heritage on the Marina residents, staff, and guests.

Historic Context

Prior to the construction of 3400 Laguna Street in 1925, the site was platted but largely undeveloped until the construction of the Panama-Pacific International Exposition (world's fair) in 1915. During the world's fair, the site was located within the Amusement and Concession Zone of the fair. After the close of the world's fair, all of the amusements and their related buildings were demolished, and the subject site was vacant in the early 1920s—at which point it was donated to the Ladies' Protection and Relief Society. The completion of the original structure, designed by prominent architect Julia Morgan, was announced in the San Francisco Chronicle on May 15, 1925.

Julia Morgan (1872-1957) was born in San Francisco and grew up in Oakland. In 1894 she became the first woman at the University of California to graduate with a degree in civil engineering and in 1901 she graduated from Ecole des Beaux-Arts, becoming the first woman to complete the course. In 1904 Julia Morgan became the first woman in California registered as an architect. Morgan's career was propelled in part by rebuilding efforts following the 1906 earthquake and fire, including the reconstruction of the Fairmont Hotel in San Francisco. She was commissioned to design hundreds of buildings, both residential and institutional. Working at a time when women's organizations were growing in prominence, Morgan was frequently chosen as the architect for their institutional

buildings, which comprised the majority of her non-residential work. Her work was not confined to any particular architectural style, but rather demonstrated flexibility in blending American and European historical influences with her Classically-inspired Beaux-Arts training. Julia Morgan was also strongly influenced by the increasingly popular Arts and Crafts style, which in the San Francisco Bay area was absorbed into what is today known as the First Bay Tradition.

With the stated mission to offer "protection and relief to strangers, to sick and dependent women and children," a group of middle-class San Francisco women, headed by philanthropist Mrs. A.B. Eaton, formed the San Francisco Ladies' Protection and Relief Society in 1853 (the Society). From 1853 to the 1920s the Society moved to different locations and served both orphans as well as young women. In 1857, the Society moved to a live-in home at Second and Tehama streets known as the "Hospitality House," from where it doubled as an employment agency by sending orphans to work in local businesses or in family homes as domestic servants. In 1860 the Society moved again to the intersection of Geary Boulevard and Franklin Street, where the house served as both home and school, with lessons in sewing, cooking and moral training for young women. Most of the women were trained to go into department sales, hairdressing and later, clerking and typing. This system of in-house education continued until 1913, after which the children were educated in the public schools.

In response to changing ideologies in the 1920s, the Society changed their mission to helping the elderly. The Society commissioned Julia Morgan to design a new facility to serve as a retirement home at 3400 Laguna Street. After it opened in 1925, the home developed a reputation as one of the finest private retirement homes in the City. Between 1925 and 1957 the site saw little change aside from the one-story Caretaker's Cottage added by the Society sometime between 1928 and 1929.

The Scandinavian Benevolent and Relief Society was among the many Victorian relief societies which existed at the same time as the San Francisco Ladies' Protection and Relief Society. Founded in 1875 by Minnie Nelson, the Scandinavian Benevolent and Relief Society was dedicated to the care of the elderly. The Scandinavian Benevolent and Relief Society changed their name to the Crocker Old People's Home in 1884 when they moved to the corner of Pine and Pierce, a home offered by Mary Crocker as a memorial to her late husband Charles Crocker, the railroad magnate.

After much discussion and litigation, the San Francisco Ladies' Protection and Relief Society and the Crocker Old People's Home decided to merge into a single organization in the early 1950s. After completion of a new wing (the Perry Building and Perry Building Connector) at the Julia Morgan Building at 3400 Laguna Street, the Crocker Old People's Home moved in 1957. The merged entity continued operating as the San Francisco Ladies' Protection Society, renaming the 3400 Laguna Street facility "The Heritage" in 1959. After the merger, The Heritage's mission shifted away from convalescent care—which had been one focus of the Ladies' Protection and Relief Society for many decades—towards an exclusive eldercare mission.

The organization is officially now the San Francisco Ladies' Protection and Relief Society DBA (doing business as) The Heritage. In 2013, a new DBA name was added: Heritage on the Marina. This organization has been in operation in San Francisco for over 160 years.

Historic Resource Evaluation

This section presents the planning department's determination that the site at 3400 Laguna Street contains two individually-eligible historic resources for the purposes of CEQA: the Julia Morgan

Building and the Caretaker's Cottage. Additionally, as explained in more detail below and in the HRR, the planning department concluded that the additions and alterations to the site made after 1957 have not taken on significance and do not contribute to the significance of 3400 Laguna Street. The additions and alterations constructed after 1957 that do not contribute to the site's significance include the Perry Building, Perry Building Connector, Health Center, central courtyard, and rear courtyard.

- ***Criterion 1:*** *Associated with events that have made a significant contribution to the broad patterns of California's History and Cultural Heritage (Events).*

The Julia Morgan Building at 3400 Laguna Street is significant under Criterion 1 (Events) as the contemporary site of one of the longest operating, if not the single longest operating, eldercare service organizations in San Francisco. The San Francisco Ladies' Protection and Relief Society (Society) was established in 1853 as an orphan and family care facility; in the 1920s, the Society shifted to eldercare and commissioned noted architect Julia Morgan to design an eldercare residence home at 3400 Laguna Street (that also provided space to convalescent women and children). The Society has made a significant contribution to the history of the City through early and ongoing efforts to protect and care for the City's older population. The Julia Morgan Building at 3400 Laguna Street is the best existing expression of the Society's important social welfare mission of the twentieth century; therefore, this building is significant under Criterion 1 (Events). The Caretaker's Cottage was constructed just three years after completion of the Julia Morgan Building and is therefore also significant under Criterion 1 (Events) for its association with the Society and its early and ongoing efforts to care for the City's older population.

The additions and alterations to the site after 1957 coincide with the Society's merger with the Crocker Old People's Home and reflect a shift away from its earliest social welfare mission amidst the changing landscape of healthcare and eldercare in the 1950s. These additions have not taken on significance as they were built to accommodate a merger with another organization and do not have a strong association with the Society's earliest social welfare mission of the early twentieth century.

- ***Criterion 2:*** *Associated with lives of persons important in our past (Persons).*

None of the buildings or landscaping on the site at 3400 Laguna Street are significant under Criterion 2 (Persons) for any close association with any persons important to local, California, or national history. Although many persons who have made contributions to the City's civic and artistic history have spent their later years at 3400 Laguna Street, research has not uncovered any residents whose contributions meet the threshold that would make the buildings or landscaping significant for their association.

- ***Criterion 3:*** *Embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (Architecture).*

The Julia Morgan Building at 3400 Laguna Street is significant under Criterion 3 (Architecture) as a representative work of an architect of merit, Julia Morgan. Morgan was the first woman to graduate from the University of California with a degree in civil engineering, the first woman to graduate from the Ecole des Beaux-Arts, and the first female registered architect in California. The Julia Morgan

Building was designed by Morgan and completed in 1925, slightly more than midway through her most productive years. In design, the building shows her noted ability to blend utilitarian needs—in this case, residential eldercare—with sophisticated aesthetics without compromising either. Overall, the building is a representative work of an architect of merit and possesses high artistic values and is therefore significant under Criterion 3 (Architecture). The Caretaker's Cottage is also significant under Criterion 3 (Architecture) as an English-inspired stone cottage with a high level of unique craftsmanship that is a rare property type for San Francisco.

None of the additions and alterations constructed after 1957 are significant under Criterion 3 for their architecture. Although some of the architects and landscape architects associated with the additions have been identified as experts in their respective fields, these additions and alterations were not determined to be the best or most representative examples of their larger bodies of work. The Perry Building and Perry Building Connecter were designed by Warren C. Perry but is a simple utilitarian design that was completed after his retirement in 1954. Overall, the design of these two additions does not embody the distinctive characteristics of a type, period, or method of construction, or possess high artistic values. While the Health Center was designed by Gardener A. Daily, an architect of merit in his own right, this addition is also of a simple utilitarian design that was completed in the last few years of his career. Furthermore, two later additions to the Health Center in the 1980s further dilute any architectural significance this addition may have had. While the Health Center was designed by a prominent architect, it does not embody the distinctive characteristics of a type, period, region, or method of construction, or possess high artistic values.

- ***Criterion 4:*** *Has yielded or may be likely to yield, information in prehistory or history (Information Potential).*

To be eligible for listing in the California Register under Criterion 4, a property must have the potential to yield information important in prehistory or history. Criterion 4 is generally understood to apply primarily to archeological resources. Criterion 4 may apply to historic architectural resources under limited circumstances where study of the physical fabric of a building, structure, or landscape may yield important scientific and historic information that is not otherwise available in the documentary record. The buildings at 3400 Laguna Street do not represent a local construction type that would yield information important to the prehistory or history of San Francisco. Therefore, the buildings or landscaping at 3400 Laguna Street are not eligible for listing under Criterion 4 either as an individual resource or as part of an eligible historic district.

Archeological resources, human remains, and tribal cultural resources are analyzed in Appendix B, Initial Study, of this draft EIR.

Period of Significance

The period of significance for the Julia Morgan Building under Criterion 1 is 1925-1957, beginning with construction of the building and ending with the merger of the San Francisco Ladies' Protection and Relief Society and the Crocker Old People's Home. The period of significance for the Julia Morgan Building under Criterion 3 is 1925, the year the building was completed. The period of significance for the Caretaker's Cottage is slightly different and under Criterion 1 it has a period of significance from 1928-1957 to reflect its later construction date and ending with the merger of the San Francisco

Ladies' Protection and Relief Society and the Crocker Old People's Home. The period of significance for the Caretaker's Cottage under Criterion 3 is 1928-1929 to reflect its construction date.

Integrity of 3400 Laguna Street

To be determined eligible for listing in the California Register, the resources under evaluation must be found to retain sufficient integrity to convey their historic significance under Criterion 1 and 3. According to the HRE and HRR, the property retains all seven aspects of integrity (a more detailed analysis of the resources' integrity is provided in pp. 69-71 of the HRE in Appendix C).[14] The resources under evaluation retain integrity of location as none of the buildings have been moved since they were constructed. The resources under evaluation retain integrity of setting as the surrounding environment has not changed such that it would compromise the integrity of setting with the adjacent blocks to the west and north remaining as open space, and the adjacent blocks to the south and east consisting of three- and four-story multifamily apartments and single-family homes.

Within the property, the new additions that took place after 1957 removed some of the grounds to the rear of the Julia Morgan Building, somewhat affecting the setting through the additions and removal of original gardens. However, while these alterations somewhat affected the setting, the Julia Morgan Building's primary façade and the front lawn remain largely intact. The 3400 Laguna Street property retains integrity of design as the Julia Morgan Building and the Caretaker's Cottage have undergone few alterations since their initial construction. The resources under evaluation retain integrity of materials through the retention of the majority of character-defining features of the Julia Morgan Building and Caretaker's Cottage. The resources under evaluation retain integrity of workmanship as the Julia Morgan Building and Caretaker's Cottage retain evidence of their original construction techniques. Of particular note is the fine terracotta ornament of the Julia Morgan Building and the stonework of the Caretaker's Cottage. The resources under evaluation also retain integrity of feeling and association through the continued use as a care facility for the elderly with historic buildings and a front lawn that convey a peaceful atmosphere.

Character-Defining Features[15]

The following is a list of character-defining features of historic resources present at the 3400 Laguna Street project site. Detailed photos of the Julia Morgan Building and Caretaker's Cottage are depicted in **Figures 3.B-1 through 3.B-4**.

[14] Page and Turnbull. 2023. 3400 Laguna Street Historic Resource Evaluation, Part 1 – Revised, Prepared for the San Francisco Planning Department. February 16.

[15] Character-defining features are essential physical features that enable the property to convey its historic identity. These distinctive character- defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible for national or state designation, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

Julia Morgan Building primary (west) façade, viewed facing east.

FIGURE 3.B-1

3400 Laguna Street Project

Julia Morgan Building, Primary Façade

SOURCE: Page and Turnbull

Photo 1: North façade of the Julia Morgan Building, viewed facing south.

Photo 2: South projection of the east (rear) façade of the Julia Morgan Building, viewed facing west.

FIGURE 3.B-2

3400 Laguna Street Project

Julia Morgan Building, North and East Façades

SOURCE: Page and Turnbull

Julia Morgan Building Front Lawn, viewed facing north.

FIGURE 3.B-3

3400 Laguna Street Project

Julia Morgan Building, Front Lawn

SOURCE: Page and Turnbull

Photo 1: Primary (south) façade, viewed facing north.

Photo 2: Oblique view of west and south façades, viewed facing northeast.

FIGURE 3.B-4

3400 Laguna Street Project

Caretaker's Cottage

SOURCE: Page and Turnbull

- **Julia Morgan Building**
  - Overall regular massing and intersecting hipped roof
  - U-shaped plan, consisting of central volume, north and south wings at east façade, and projections at north and south façades
  - Structural brick exterior walls
  - Slate roof shingles
  - Symmetrical arrangement of front façade, with central gabled parapet
  - Historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows
  - Projecting canted bays
  - Hipped dormer windows at roof
  - Operable, divided-lite windows retaining historic configurations
  - Terra cotta details: window surrounds with vegetative motifs in segmental arches; decorative panels and entablatures at canted bays; belt course above second level windows; projecting cornice with buttons at eave; coping and finial at central gabled parapet; double arched door surround at primary entrance vestibule
  - Arched ground-level door openings
  - Stained glass windows at interior chapel
  - Additional historic design features: narrow blind niche and recessed diamond and square details in brick
  - Historic glazed doors within entrance vestibule
  - Three brick chimneys
  - Front double stairs with iron railing
  - Towers and penthouse at east façade
  - Rain catch baskets
  - Historic features in publicly accessible interior areas include:
  - Tile floor
  - Central stairwell with trefoil railing
  - Fireplace mantel
  - Wood coffered ceiling

- **Front Lawn of the Julia Morgan Building**[16]
  - Iron fence on brick base along west, north, and south property lines
  - Curvilinear pedestrian paths leading from front stairs to two gates along the Laguna Street fence, and two paths curving north and south from the main entrance; paths appear to have been resurfaced since the period of significance, thus circulation routes are character-defining rather than paving materials

[16] In March 2024, the planning department received a community-initiated article 10 landmark designation nomination for 3400 Laguna Street. The nomination identified a list of character-defining features that was more or less aligned with the department's list of character-defining features in the HRR dated February 27, 2024, with small changes to the language. The only additional character-defining features identified related to the front lawn and landscaping, and landscaping around the Caretaker's Cottage. The department reviewed the additional character-defining features and the department's list now includes modifications to the front lawn to incorporate the location of plantings along the front lawn panels, the location of mature trees at the northwest corner of the site, and landscaped area around the cottage entrance.

- Lawn panels and location of nearby plantings along curvilinear lawns in front landscaped area
- Location of mature trees at northwest corner of the site

- **Caretaker's Cottage**
  - One-story massing
  - L-shaped footprint
  - Steeply pitched hipped roof
  - Rough stone exterior cladding
  - Punched window openings with fixed and casement windows
  - Landscaped area around main cottage entrance

Adjacent Historic Architectural Resources

According to the HRR,[17] the project site is in the Marina neighborhood. Across Laguna Street to the west, the 3400 Laguna Street property faces the Moscone Recreation Center that contains the article 10 designated Marina Branch Library and the California Register-eligible Funston bleachers that are identified as contributors to the discontiguous Midcentury Recreation historic district. In addition, the Fort Mason historic district is located to the north of the proposed project. The 3400 Laguna Street property, which is the proposed project site, occupies the western half of a residential block situated between Laguna and Octavia streets. The following is a brief description of the historic resources near the project site:

- **Marina Branch Library:** The Marina Branch Library is significant as an article 10 landmark under National Register Criterion A (events) as reflection of principles of the modern public library promoted by the American Library Association after World War II, and under Criterion C (design/construction) as it represents an innovative example of midcentury modern design in Northern California.[18] Although the entire parcel is designated as an article 10 landmark, the library building itself faces Chestnut Street and has no visual, aesthetic, or historical relationship with the proposed project location.
- **Funston Bleachers:** The Funston bleachers are contributors to the California Register-eligible discontiguous Midcentury Recreation historic district. This historic district is eligible under California Register Criterion 1 (events) for its association with the 1947 bond measure that funded the single largest expansion of recreational facilities in San Francisco's history, and under Criterion 3 (architecture) for embodying the distinctive characteristics of a type and period, and as exemplifying the work of an architect of merit, William Gladstone Merchant.[19] The Funston bleachers are situated closer to the proposed project site along Bay Street, however they do not have any meaningful visual or historic relationship with the proposed project.
- **Fort Mason Historic District:** The Fort Mason historic district is listed in the National Register under Criterion A for its role as a coastal defense for the San Francisco Bay as far back as the Spanish and Mexican administration of Alta California up to the post-Spanish American War, and under Criterion C as a collection of military structures spanning over 100 years with various

[17] Page and Turnbull. 2023. 3400 Laguna Street Historic Resource Evaluation, Part 1 – Revised, Prepared for the San Francisco Planning Department. February 16.

[18] Marina Branch Library Article 10 designation, Landmark No. 262, https://sfplanninggis.org/docs/landmarks_and_districts/LM262.pdf, accessed May 22, 2024.

[19] Excerpt from the Cayuga Clubhouse Historic Resource Evaluation prepared by Page and Turnbull, October 25, 2010.

architectural styles reflecting the evolution of this army post.[20] The Fort Mason Port of Embarkation historic district is a smaller collection of buildings near the water that is listed in the National Register and is also eligible as a National Historic Landmark under Criterion A as one of the most important ports of embarkation for soldiers and supplies during World War II. Contributing features to the Port of Embarkation historic district include buildings, sites, and features along the waterfront and the period of significance spans from 1912-1945.

Planning department staff determined there are no adjacent historic resources including no historic districts immediately south or east of the project site.

3.B.5 Impacts and Mitigation Measures

This section analyzes impacts related to historic resources for the 3400 Laguna Street Project. It describes the methods used to determine the impacts that could occur with implementation of the 3400 Laguna Street Project and lists the criteria used to conclude whether an impact would be significant. Mitigation measures are identified as necessary to reduce or avoid significant impacts.

Significance Criteria

The proposed project would have a significant impact on historic resources it if would:

- Cause a substantial adverse change in the significance of a historic resource as defined in CEQA Guidelines section 15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code.

A "substantial adverse change" is defined by CEQA Guidelines section 15064.5 as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historic resource would be materially impaired." The significance of a historic resource is "materially impaired," according to CEQA Guidelines section 15064.5(b)(2), when a project "demolishes or materially alters in an adverse manner those physical characteristics" of the resource that:

a. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
b. Account for its inclusion in a local register of historic resources pursuant to Public Resources Code section 5020.1(k) or its identification in a historic resources survey meeting the requirements of Public Resources Code section 5024.1(g), unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
c. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

As noted above, a project that would comply with the Secretary's Standards is considered to have mitigated its impact to a less-than-significant level (CEQA Guidelines section 15064.5(b)(3)). Projects that do not comply with the Secretary's Standards may or may not cause a substantial adverse

[20] Erwin Thompson, "Fort Mason National Register of Historic Places Inventory – Nomination Form" Section 8, Significance.

change in the significance of a historic resource and would require further analysis to determine whether the historic resource would be "materially impaired" by the project under CEQA Guidelines section 15064.5(b).

Potential impacts to archeological resources and the potential for the disturbance of human remains are evaluated in the cultural resources section of the initial study located in Appendix B. In addition, any potential vibration impacts caused by construction of the proposed project on adjacent buildings were addressed in Section E.7, Noise of the initial study.

Approach to Analysis

Potential impacts on historic resources are assessed by identifying any activities (either during construction or operation) that could affect resources that have been identified as historical resources for the purposes of CEQA. Once a resource is identified, it then must be determined whether the proposed project would "cause a substantial adverse change in the significance" of the resource, as described above. As such, per CEQA Guidelines section 15064.5(b)(2), the following analysis considers the potential for the proposed project to materially impair the significance of a historic architectural resource by causing direct or indirect changes to the physical characteristics of the resource that convey its historical or architectural significance.

Approach to Cumulative Analysis

With respect to historic resources, cumulative projects within 0.25 mile of the project site which would involve alteration, new construction, and/or intensity of land uses in the project site vicinity, could combine with the impacts of the proposed project to create a significant cumulative effect. The cumulative historic resource setting for the proposed project includes the cumulative effects from implementation of the Marina Improvement and Remediation Project, which is described in section 3.A.5, Cumulative Impact Analysis.

Impact Evaluation

Impact CR-1: The proposed project may cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code. ***(Less than Significant with Mitigation)***

As outlined in Chapter 2, Project Description, the proposed project would demolish two of the five existing buildings (the Perry Building Connector and the Health Center) and construct two new buildings (the Bay Building and the Francisco Building). Based on the HRE and HRR, and as described above, the 3400 Laguna Street site is not listed in the National Register or the California Register, nor is it a local San Francisco article 10 landmark; however, the site is eligible for listing in the California Register and the planning department received an Historic Landmark Designation application for the Julia Morgan Building on March 22, 2024. The application was considered by the Historic Preservation Commission for the Landmark Designation work plan on May 15, 2024, and was added to the work plan. On August 21, 2024, with Resolution 1416, the Historic Preservation Commission initiated the Landmark Designation process for adoption. As noted above, the nomination requires one additional Historic Preservation Commission hearing before being sent to the Board of Supervisors to review and approve the Landmark Designation. The site contains two individually eligible historic resources, the Julia Morgan Building and the Caretaker's Cottage; both were determined eligible for listing in the

California Register under Criterion 1 and 3, and project impacts to these two resources are discussed in more detail below.

The buildings proposed for demolition are not historic resources, nor do they contribute to the Julia Morgan Building's historic or architectural significance, as described above. The Julia Morgan and Perry buildings would be interconnected to the two new buildings, similar to the existing buildings' configuration, and potential impacts from proposed changes are discussed below.

To assess the proposed project's potential impacts on the historic resources present at the 3400 Laguna Street project site, a qualified historical consultant first prepared an HRE that determined the project site contained a historic resource. The findings of this HRE were confirmed by the planning department in the HRR, which found the site contained two individually eligible historic resources, the Julia Morgan Building and the Caretaker's Cottage; both were determined eligible for listing in the California Register under Criterion 1 and 3. The planning department then evaluated the proposed project's potential to cause a substantial adverse change in the significance of the historic resource pursuant to CEQA Guidelines section 15064.5. The department evaluated the project for conformance with the Secretary's Standards and then evaluated whether or not the proposed project would cause material impairment to the identified historic resources on the site. The findings of the evaluation are summarized below and are available in full in the HRR provided in Appendix C (pp. 8-13).

The following is an analysis of the proposed project's conformance with the Secretary's Standards for Rehabilitation.

> **Standard 1** – *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.*
>
> The proposed project does not propose a change in use and the existing facility would continue to be a residential care facility as it has been since opening in 1925. Aside from some minor repairs to the Julia Morgan Building, the proposed project does not require changes to the building's character-defining features in order to maintain its continued use as a residential care facility. Currently, the primary entrance to the site via the Julia Morgan Building does not meet Americans with Disabilities Act (ADA) requirements, therefore an alternative ADA-compliant entrance would be provided off Francisco Street from the curb cut into the Health Center. Rather than make alterations to the front entrance of the Julia Morgan Building to make it ADA accessible, the proposed project would continue to use an alternative entrance while still maintaining the Julia Morgan Building entrance. Even if it is necessary to use a different primary entrance to meet ADA requirements given the slope of the pathways leading up to the Julia Morgan Building, the center entrance to the Julia Morgan Building would retain its appearance as a main primary entrance to the facility and would still function as an entrance.
>
> **Therefore, the proposed project is in conformance with Standard 1.**
>
> **Standard 2** – *The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.*

The proposed project would change the character of the property by constructing additions on the site that are taller and have larger footprints than the existing additions. The renovation and exterior addition to the Perry Building would result in a minimal change to the overall features and spaces that characterize the property because, for the most part, the proposed changes would modify this non-historic addition that is located along the western edge of the site. The Perry Building is the addition behind the Julia Morgan Building located along the rear of the property in a location that has minimal effect on the Julia Morgan Building. From Laguna Street, the Perry Building is almost completely obscured by the Julia Morgan Building itself. Therefore, alterations and additions to the Perry Building would affect the setting minimally due to its existing location at the site's eastern edge at the rear of the property, as shown in Figures 2-11 and 2-12 in Chapter 2, Project Description.

Construction of the new 40-foot-tall Bay Building in the approximate location of the 22-foot-tall Perry Building Connector would cause some alterations to the overall character of the property due to it being taller and having a larger footprint than the structure it would replace (Figures 2-11 and 2-12 in Chapter 2, Project Description). The four-story massing of the Bay Building would be taller than the existing two-story massing of the Perry Building Connector and would therefore be more visually prominent on the site. Additionally, while the north elevation of the Julia Morgan Building and the Perry Building Connecter are aligned with each other, the Bay Building would have a larger footprint and its north elevation would project further north towards Bay Street. In order to provide some space between the massing the of Bay Building and the Julia Morgan Building, a 29 foot-tall glass hyphen[21] that is slightly recessed from the north elevation of the Julia Morgan Building would provide a separation between the two buildings.

The biggest change in the character of the property would take place along the southern portion of the site where the one-story Health Center is currently located. Demolition of the 15-foot-tall Health Center and construction of the 40-foot-tall Francisco Building would somewhat alter the setting of this portion of the site, because the four-story massing would be a large new structure near the three-story Julia Morgan Building (refer to Figure 2-11 in Chapter 2, Project Description). However, the massing of the new Francisco Building would be set back from Laguna Street approximately 15.5 feet further than the existing Health Center so as to almost be aligned with the rear roof gable of the Julia Morgan Building's south elevation projection.[22] Pushing this taller massing of the Francisco Building farther east would maintain the primacy of the Julia Morgan Building. Although the new Francisco Building would be taller than the existing Health Center, it would still have a generous setback from Laguna Street and would be visually separated from the Julia Morgan Building.

Despite these project-related alterations to the property that would cause changes to some of the features and spaces that characterize the property overall, the most prominent views of the Julia Morgan Building would only be slightly affected (Figures 2-11 and 2-12, Chapter 2, Project Description). The character-defining front lawn would remain intact, as would the

[21] A hyphen is an architectural technique to provide a physical link between an historic building and a newer building, while maintaining distinction between the new construction and the original.

[22] The existing Health Center Building is set back 51 feet 2 inches from Laguna Street and the proposed Francisco Building's setback would be 66 feet 10 inches. The difference would be approximately 15 feet 8 inches.

overall massing and configuration of the Julia Morgan Building. Additionally, the new additions and alterations would connect with the Julia Morgan Building's northeastern edge, in the location already altered by the Perry Building Connector. Therefore, the character-defining features related to the Julia Morgan Building's overall form would remain intact, including its regular massing and intersecting fixed roof, U-shaped plan with north and south wings, as well as all the decorative detailing on all elevations and the front lawn. Additionally, none of the identified character-defining features of the Caretaker's Cottage would be removed and its historic character would be retained and preserved.

Therefore, there are elements of the proposed project that are in conformance with Standard 2, but certain other elements of the project that aren't entirely in conformance with this standard.

Standard 3 – *Each property shall 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 architectural elements from other buildings, shall not be undertaken.*

The project does not propose any alterations to the identified character-defining features of the Julia Morgan Building or the Caretaker's Cottage that would be conjectural or would incorporate architectural elements from other buildings. The contemporary design of the new construction would not give the impression of a false sense of historical development and would be understood as contemporary additions.

Therefore, the proposed project is in conformance with Standard 3.

Standard 4 – *Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.*

As discussed above, the subsequent additions to the subject property that were added over time have been evaluated and determined to not be historically significant; the Perry Building, Perry Building connector, and the Health Center do not contribute to the significance of the subject property. Additionally, the central courtyard and fountains located east of the Julia Morgan Building and the rear courtyard located east of the Perry Building are also not historically significant themselves and are non-contributing features of the subject property. As discussed above, these buildings and landscapes are all additions and alterations that were added to the site after 1957 and do not have strong associations with the Society's earliest social welfare mission. Additionally, while some of the additions and alterations may have been designed by architects and landscape architects of merit, they are not the best or most representative examples of their larger bodies of work. Therefore, demolition of the Perry Building Connecter and Health Center, and alteration and addition to the Perry Building and central courtyard is in conformance with Standard 4 because these portions of the site are not historically significant.

The only additional part of the property that is historically significant is the Caretaker's Cottage that was constructed in 1928-1929. The proposed project would retain the Caretaker's Cottage in its existing location and none of its associated character-defining features would be

altered. The portions of the property that are historically significant would be retained and preserved.

Therefore, the proposed project is in conformance with Standard 4.

Standard 5 – *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*

A number of character-defining features of the Julia Morgan Building and Caretaker's Cottage reflect the distinctive features, finishes, and construction techniques that characterize these resources. The distinctive features of the Julia Morgan Building include the structural brick exterior walls, slate roof shingles, operable divided-lite windows (including stained glass windows in the ground floor chapel area), and terra cotta details, among others. The proposed project would retain and repair, as necessary, the distinctive features of the Julia Morgan Building described in the list of character-defining features, and would include any necessary repairs as described in the project description.

Other distinctive features and finishes of the site that would remain include the iron fence on a brick base along the front lawn and the rough stone exterior cladding of the Caretaker's Cottage.

Therefore, the proposed project is in conformance with Standard 5.

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

As part of the proposed project, the Julia Morgan Building would require some exterior repairs to the windows and brickwork. The distinctive historic features would be repaired rather than replaced.[23] Additionally, as described below in **Mitigation Measure M-CR-1: Best Practices and Construction Monitoring Program** for Historic Resources, any accidental damage to the identified historic resources caused by construction of the proposed project would need to be repaired in conformance with the Secretary's Standards.

Therefore, the proposed project is in conformance with Standard 6.

Standard 7 – *Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.*

The proposed project does not anticipate the use of any chemical or physical treatments that would cause damage to any historic materials.

[23] Page and Turnbull. 2024. 3400 Laguna Street Julia Morgan Building and Caretaker's Cottage Character-Defining Features. August 1.

Therefore, the proposed project is in conformance with Standard 7.

Standard 8 – *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.*

Archeological resources are addressed in Section E.4, Cultural Resources of the initial study (Appendix B). As stated in the initial study, the proposed project could result in a significant impact to archeological resources and requires implementation of **Mitigation Measure M-CR-2: Archeological Monitoring Program**. Mitigation Measure M-CR-2 is proven to either avoid or lessen impacts to archeological resources through monitoring, stop work procedures and investigation and interpretation of significant resources. With implementation of Mitigation Measure M-CR-2, the proposed project would be in conformance with this standard.

Therefore, the proposed project is in conformance with Standard 8.

Standard 9 – *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*

The proposed project includes the demolition of two existing buildings (the Perry Building Connector and Health Center), and renovation of two existing buildings on the property (the Perry Building and the Julia Morgan Building). Demolition of the Perry Building Connector and Health Center, and renovation and additions to the existing Perry Building, which are not historically significant, would not cause the demolition of any historic materials that characterize the historic property. However, there would be the potential for inadvertent damage during construction from the construction equipment, specifically vibration caused by construction equipment. Construction vibration impacts are addressed in Section E.7 Noise of the initial study. **Mitigation Measure M-NO-1: Protection of Adjacent Building/Structures and Vibration Monitoring During Construction** requires any damage from construction be repaired to pre-existing conditions in consultation with a qualified historic preservation professional and planning department preservation staff. Therefore, the proposed project would be in conformance with this standard as it relates to potential damage during construction. With the addition of Mitigation Measure M-CR-1, Best Practices and Construction Monitoring Program for Historic Resources, as described below, the project sponsor would be required to develop a list of measures to be included in construction contract specifications to avoid accidental damage to historic resources from other construction activities. With Mitigation Measures M-NO-1 and M-CR-1 applied to the project, the proposed project would be in conformance with this standard.

In general, the proposed project would include additions and alterations to the overall site that are in locations that do not affect the historical integrity of the property and its environment. New construction would be limited to locations where there have already been alterations in the past, such as in the locations east and south of the Julia Morgan Building where there are currently non-historic additions and non-historic courtyards. The footprint of the new Bay Building would encroach on some areas that are currently occupied by the central courtyard in the middle of the property and the parking lot to the north of the

property. Both areas are not considered character-defining features and do not contribute to the significance of the property. Similarly, the new Bay Building would be located roughly on the footprint of the Health Center (which is proposed to be demolished), on a part of the property that is not historically significant.

The new construction would connect the proposed Bay Building with the Julia Morgan Building only at the point where there is already a connection, at the rear eastern end of the northern wing. This allows the retention of the Julia Morgan Building's character-defining "U-shaped" plan. Therefore, the footprint of the new construction would be limited to areas that allow for the retention of the most important and historically significant portions of the site, including the Julia Morgan Building and its front lawn, and the Caretaker's Cottage.

Modifications to the Julia Morgan Building would include some removal of non-historic features that currently detract from the character of the north elevation. The heating and cooling equipment and loading dock that extend from the Julia Morgan Building's current north elevation would be removed. Other interior and exterior renovations to the Julia Morgan Building would rehabilitate and repair existing features of the historic property and would not destroy any of the historic materials that characterize the property.

The height of the new Francisco Building would be no greater than 40 feet (excluding rooftop appurtenances), but taller than the existing Health Center; therefore, there would be a four-story structure where there is currently only a one-story structure. The height of the new four-story Francisco Building would roughly match the height of the roof peak of the Julia Morgan Building. This additional height and massing would somewhat block the view of the Julia Morgan Building from certain vantage points along Francisco Street and would somewhat impose on the setting of the Julia Morgan Building along the southern portion of the property, compared to existing conditions. However, as mentioned in Standard 2, the footprint of the new Francisco Building would not extend as far west (approximately 15.5 feet less) as the existing Health Center and instead would be aligned approximately with the rear roof gable of the south façade projection on the Julia Morgan Building, allowing for increased visibility of the southern elevation from other vantage points.

On a similar note, the massing of the new Bay Building at the northern side of the property would extend farther north into the property than the existing footprint of the Perry Building Connector. The existing Perry Building Connector's north elevation is aligned with the rear north wing of the Julia Morgan Building and is less visible from the Laguna Street vantage point than the new Bay Building would be (see Figures 2-10 and 2-11 in Chapter 2, Project Description). This project-related change would not directly affect any of the identified character-defining features of the Julia Morgan Building. However, the height and location of this new massing would affect the setting of the original building in this location because it would start to encroach on the Julia Morgan Building's primacy from certain vantage points. To reduce the effect of the proposed Bay Building's massing on the Julia Morgan Building, a 29-foot-tall, two-story glass connecting hyphen would connect the Bay Building and the Julia Morgan Building. The materials, massing, and location of this glass hyphen is intended to provide a sensitive connection to the Julia Morgan Building as well as a transition to the taller mass of the new Bay Building. This glass hyphen would be slightly recessed from the north

elevation of the Julia Morgan Building so as to provide a reveal between the historic building and the new connection. The use of glass as a material for the hyphen would allow for a transparent wall at the only location where the proposed new development would actually connect with the Julia Morgan Building. The glass hyphen would also be two stories tall, so as to align with the bottom of the roof line of the Julia Morgan Building and allow for a more gradual transition to the taller four-story massing of the new Bay Building.

The proposed materials and fenestration of the new construction on-site would be contemporary but would not be incompatible with the regular rhythm of punched openings and brick façade of the Julia Morgan Building or the stone construction of the Caretaker's Cottage. The new construction would feature a ground floor finished in Roman style brick and upper floors of a pre-weathered metal panel system. The elevations of the new construction would be broken up into bays through the use of different colored panels and slight recesses in the elevations. This would help visually reduce the overall bulk of the new construction's massing since it would break up the elevations into discrete portions. The pattern of openings would also be primarily of vertically oriented punched openings with fixed and double casement windows. Overall, the use of solid materials, such as metal panels and Roman brick, and regularly spaced punched openings of vertically oriented windows, would be compatible with the character of the on-site historic resource without mimicking it.

The most important feature of the Julia Morgan Building's setting, the front lawn, would remain intact. The front lawn affords the most important views of the Julia Morgan Building from vantage points along Laguna Street from Bay to Francisco streets. The front lawn also provides the necessary setback to maintain the primacy of the Julia Morgan Building on the site. Additionally, the location of the front lawn and its relationship to the Julia Morgan Building reinforces the importance of the site's primary entrance that is located directly in the center of the Julia Morgan Building's west elevation, a building that is itself centered in the middle of the front lawn. The proposed new structures on the property would not interrupt the symmetrical and hierarchical aspects of the property along Laguna Street, from the front lawn and its curvilinear pathway, to the entrance centered on the Julia Morgan Building. From the most important views, the proposed new structures would recede into the background or be entirely out of view (see Figures 2-11 and 2-12 in Chapter 2, Project Description). Although the proposed new construction would add some visual impositions, the Julia Morgan Building would retain its prominence on the site thanks in part to the generous setback provided by the front lawn.

Therefore, while there are elements of the project that are in conformance with Standard 9, as outlined above there are other proposed project elements that aren't entirely in conformance with this standard.

Standard 10 – *New additions and adjacent or related new construction shall 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.*

Because the location of the proposed new structures and alterations would take place on portions of the property that are not historically significant, the new construction would not affect any parts of the property that relate to its historic significance. The additions would

connect with the Julia Morgan Building in the location where there already is an existing connection; thus, reducing the physical alterations required to connect the Julia Morgan Building with the new construction. Other areas of the property, such as the front lawn and Caretaker's Cottage would also not be affected by the new construction. If in the future, the proposed project were to be removed, the Julia Morgan Building and front lawn, and Caretaker's Cottage would maintain their essential form and integrity and would be unimpaired.

Therefore, the proposed project is in conformance with Standard 10.

Based on the above evaluation of the project the planning department finds some aspects of the proposed project are not entirely in conformance with the Secretary's Standards. However, the planning department finds that the proposed project, even if not entirely in conformance with all 10 standards, would not cause material impairment to the historic resource. The proposed massing of the new construction is such that it would be taller than the Julia Morgan Building and would appear to encroach on the Julia Morgan Building from some secondary perspectives. The massing of the new Bay Building would be most visible along Francisco Street and at the intersection of Francisco and Laguna streets, where the existing one-story Health Center would be replaced by the four-story Francisco Building. Because of the increase in building height at this location the new building would be much more prominent from this vantage point and would impose on the setting of the Julia Morgan Building from certain points of view. However, the new construction would not block the Julia Morgan Building from these perspectives entirely, even if the roof line of the Julia Morgan Building would be less visible from the street at certain perspectives. Because the new Francisco Building would be set back from Laguna Street further than the existing Health Center, this deeper setback would, however, reveal more of the Julia Morgan Building's south elevation from these perspectives, compared to under existing conditions.

The new Bay Building would be most visible from the intersection of Bay and Laguna streets and would constitute the biggest modification to the setting from this perspective. The Bay Building would be taller than the Julia Morgan Building and the Caretaker's Cottage and would have a massing that projects out farther towards Bay Street, than the existing (proposed to be demolished) Perry Building Connector. While the new construction would be visible from the northwest corner of the site, it would not compete with the primacy of the Julia Morgan Building due to the incorporation of a hyphen and the primary façade of the Julia Morgan Building facing west onto the front lawn. The new construction would not affect the generous setback that the front lawn provides for the Julia Morgan Building's most important elevation.

As stated in review of the project for conformance with Standard 9, planning department staff determined that the design and materials of the new structures would be compatible with the character of the historic resource and would not negatively affect the site overall.

Although the proposed project does not include any exterior alterations to the Caretaker's Cottage, planning staff have also reviewed the proposed project and determined it would not cause material impairment to the Caretaker's Cottage. The Caretaker's Cottage is currently situated just north of the Perry Building and is immediately west of the neighboring 1435 Bay Street, a four-story multi-family residential building. Therefore, the immediate setting of the Caretaker's Cottage is already

characterized by contemporary urban infill. Furthermore, the inward orientation of the Caretaker's Cottage, with its primary entrance facing away from Bay Street, makes the Caretaker's Cottage less of a public facing building than the Julia Morgan Building. While the new construction may intensify the built-up nature of the immediate setting of the Caretaker's Cottage, it would not be a significant change from its existing condition.

Planning department staff have determined that while the proposed new construction would cause some changes to the setting of historic resources present at the 3400 Laguna Street site, these changes do not rise to the level such that the individual historic resources on the site would no longer communicate their significance. While the massing of the new construction would be visible from some perspectives of the site, the property would still maintain the Julia Morgan Building's prominence along Laguna Street. The new construction would be limited to areas away from the front lawn, thus preserving the setting of the Julia Morgan Building's primary façade. Additionally, the proposed project would include rehabilitation of the Julia Morgan Building that would repair some character-defining features and remove some non-historic alterations that have altered the Julia Morgan Building's north elevation. The character-defining features of the Julia Morgan Building and its lawn and Caretaker's Cottage would therefore be retained.

The Julia Morgan Building and Caretaker's Cottage would continue to communicate their significance and eligibility for listing in the California Register. Proposed new construction would be more visible in locations on the project site where non-historic additions currently exist and, in some cases, in locations currently dedicated to a parking lot. However, upon project completion, the Julia Morgan Building would still convey its historic significance under Criterion 1 with its association with the San Francisco Ladies' Protection and Relief Society as well as under Criterion 3 as a representative work of Julia Morgan, an architect of merit who created a design that blended utilitarian needs with sophisticated aesthetics. Similarly, the stone Caretaker's Cottage would also continue to convey its significance under Criterion 1 with the San Francisco Ladies' Protection and Relief Society and under Criterion 3 as an excellent and unique example of an English-inspired stone cottage. Although the proposed project would cause some changes to the property's overall setting, it would not be to the level such that it would cause material impairment to the identified historic resources. After completion of the proposed project, the historic resources present at 3400 Laguna Street would still continue to convey their historic significance that makes them eligible for listing in the California Register.

As described above, upon project completion, the project would have a less than significant impact on the historical resources at 3400 Laguna Street. However, there is potential for project construction activities to inadvertently damage or destroy character-defining features of the identified historical resources on site from the use of vibration generating equipment or due to accidents. As such, this impact would be considered significant and mitigation measures would be necessary to reduce this significant impact to LTS levels. Section E.7 of the initial study evaluates the potential for construction equipment to generate vibration levels that could cause building damage. The analysis finds that there is potential for the proposed project to damage on-site historic resources and result in a significant impact and therefore requires implementation of Mitigation Measure M-NO-1. This mitigation measure addresses potential vibration impacts that could be caused by vibration generating construction equipment and would reduce vibration levels to less than significant levels at the historic buildings on the project site through development and implementation of a vibration

management and monitoring plan. Should construction equipment generate vibration that causes damage to onsite historic buildings, this mitigation measure requires that buildings be restored to their pre-construction condition, in consultation with a qualified historic preservation professional and planning department preservation staff. In addition, and to address the potential for accidental damage unrelated to vibration from construction equipment, Mitigation Measure M-CR-1 has been identified. The mitigation measures would require implementation of construction best management practices and a monitoring program during construction that would be approved and reviewed by the City's Environmental Review Officer. The implementation of a monitoring program is a proven method at the City for avoiding impacts to historic resources. As such, with implementation of Mitigation Measure M-NO-1 and Mitigation Measure M-CR-1, project impacts would be **less than significant with mitigation.**

Mitigation Measure M-CR-1: **Best Practices and Construction Monitoring Program for Historic Resources.** Prior to the start of construction activities, the project sponsor shall submit to the planning department preservation staff for review and approval, a list of measures to be included in contract specifications to avoid accidental damage to historic resources. The measures can include, but are not limited to, staging of equipment and materials so as to avoid direct damage; maintaining a buffer zone, when possible, between heavy equipment and historic resources; and, when applicable, covering the roof of adjacent structures to avoid damage from falling objects. Specifications shall also stipulate that any damage incurred to historic resources from construction activities shall be immediately reported to the ERO.

If directed by planning department preservation staff, the project sponsor shall engage a qualified preservation professional who meets the standards for history, architectural history, or architecture (as appropriate), as set forth by the Secretary of the Interior's Professional Qualification Standards (36 CFR, Part 61), to undertake a monitoring program to ensure that best practices are being followed. If monitoring is required, the qualified preservation professional shall prepare a monitoring plan to direct the monitoring program that shall be reviewed and approved by planning department preservation staff.

Damage incurred to the historic resource shall be repaired to match pre-construction conditions per the Secretary of the Interior's Standards for the Treatment of Historic Properties in consultation with the qualified professional and planning department preservation staff.

Impacts to Nearby Historic Resources

Historic resources that were identified west of the proposed project location include the article 10 listed Marina Branch library and the California Register-eligible Funston bleachers, which were identified as a contributor to the discontiguous Midcentury Recreation historic district. Historic resources identified north of the proposed project location include the Fort Mason historic district and the Fort Mason Port of Embarkation historic district. Because the proposed project includes infill of an

urban site near these historic properties in a manner that is consistent with the height and massing of the surrounding neighborhood, the project would have no anticipated offsite impacts to historic resources. All identified nearby historic resources are surrounded by residential neighborhoods that contain single-family homes and multi-family apartments that range between three and four stories. The proposed project, which was found compatible with the size and massing of the surrounding residential neighborhood, would not have the potential to cause an indirect impact on any of the identified historic resources nearby. There are no identified historic resources immediately south or east of the proposed project location. However, if in the future, any of the properties immediately south or west of the proposed project location were to be identified as historic resources, the urban infill nature of the proposed project that is compatible with the height and massing of the neighborhood would not have an indirect impact on the neighboring properties.

As such, the project would have a **less than significant** impact on adjacent historic resources.

Cumulative Impacts

Impact C-CR-1: The proposed project, in combination with cumulative projects, would not cause a substantial adverse change in the significance of a historical resource. (*Less Than Significant*)

According to the HRR, the only identified project within the cumulative study area is the Marina Improvement and Remediation Project. Because the historic buildings at 3400 Laguna Street have no aesthetic or historic relationship with the marina, the proposed project at 3400 Laguna Street does not have the potential to combine with the Marina Improvement and Remediation Project to negatively affect historic resources. As a site containing two individually eligible historic resources, the proposed project's potential impact to historic resources would be limited to the historic resources on the site and those immediately adjacent to the site. Therefore, the planning department determined that the proposed project would not combine with cumulative projects to result in a significant impact on any of the identified historic resources in the adjacent vicinity and cumulative impacts would be **less than significant**. No mitigation measures are required.

3.C Air Quality

This section of the draft EIR describes the existing air quality conditions in the project area and vicinity, identifies the regulatory framework for air quality management, and analyzes the potential for implementation of the proposed project to affect air quality conditions, both regionally and locally, due to activities that emit criteria and noncriteria air pollutants. The analysis accounts for the types and quantities of emissions that would be generated on a temporary basis due to construction activities. The analysis determines whether those emissions are significant in relation to applicable air quality standards, and identifies feasible mitigation measures for significant adverse impacts. Information supporting this analysis of air quality impacts is included in Appendix D of this draft EIR. Operational criteria air pollutant emissions and other air quality-related topics are evaluated in Section E.8, Air Quality of the initial study, included in Appendix B.

As outlined in Chapter 1, Introduction, consistent with the requirements of CEQA Guidelines sections 15063 and 15082, the planning department twice circulated Notice of Availability (NOA) of a Notice of Preparation (NOP) that an EIR would be prepared. Comments received on the NOPs related to air quality included concerns about air pollution from construction and excavation activities and exposure to vulnerable populations in nearby open spaces and recreational facilities. These comments are addressed under Impacts AQ-2 and AQ-4. Additional comments expressed concerns regarding increased air pollution from generator use and truck idling exhausts at loading docks as well as ambient air pollution. These comments are addressed in Section E.8, Air Quality of the initial study (Appendix B). The analysis in this section is based on a review of existing air quality conditions in the region, and air quality regulations administered by the U.S. Environmental Protection Agency (U.S. EPA), the California Air Resources Board (air board), and the Bay Area Air Quality Management District (air district). This analysis includes methodologies identified in the air district's CEQA air quality guidelines and the health risk assessment (HRA) methodology published by the Office of Environmental Health Hazard Assessment (OEHHA) in 2015.[1,2]

3.C.1 Environmental Setting

The project site is in the San Francisco Bay Area air basin (air basin), which includes all of San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa counties, and the southern and southwestern portions, respectively, of Sonoma and Solano counties. The air district is the regional agency responsible for air quality planning in the air basin.

The study area for regional air quality impacts is the air basin. The study area for localized air quality impacts is generally within 1,000 feet of the project site.[3] Although the project site is in one of the least

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1 Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, April 2023, *https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines*, accessed January 17, 2024.

2 California Environmental Protection Agency, *The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessment*, February 2015, *http://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf*, accessed January 17, 2024.

3 Bay Area Air Quality Management District, California Environmental Quality Act Air Quality Guidelines, Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards. April 25, 2023, p. E-102, *https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines*, accessed January 17, 2024.

environmentally burdened areas[4] in San Francisco, it is within the City's Air Pollutant Exposure Zone (APEZ).

Climate and Meteorology

The air basin's moderate climate steers storm tracks away from the region for much of the year, although storms generally affect the region from November through April. Temperatures in the proposed project vicinity average in the mid-50s annually, generally ranging from the low 40s on winter mornings to mid-70s during summer afternoons. Daily and seasonal oscillations of temperature are small because of the moderating effects of San Francisco Bay. In contrast to the steady temperature regime, rainfall is highly variable and confined almost exclusively to the "rainy" period from November through April. Precipitation may vary widely from year to year because a shift in the annual storm track of a few hundred miles can mean the difference between a wet year and drought conditions.

Atmospheric conditions—such as wind speed, wind direction, and air temperature gradients—interact with the physical features of the landscape to determine the movement and dispersal of air pollutants regionally. The proposed project is in northeastern San Francisco, in the Peninsula climatological subregion, as defined by the air district. Marine air traveling through the Golden Gate is a dominant weather factor affecting dispersal of air pollutants in the region. Wind measurements collected on the San Francisco mainland indicate a prevailing wind direction from the west at about 10 miles per hour, and an average annual wind speed of 7.7 miles per hour.[5] Increased temperatures create the conditions in which ozone formation can increase.

Ambient Air Quality – Criteria Air Pollutants

As required by the federal Clean Air Act of 1970, the U.S. EPA initially identified six criteria air pollutants that are pervasive in urban environments, and for which state and federal health-based ambient air quality standards have been established. The U.S. EPA calls these pollutants "criteria air pollutants" because the agency has regulated them by developing specific public-health-based and welfare-based criteria for setting permissible levels. Ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead are the six criteria air pollutants originally identified by U.S. EPA. Since that time, subsets of particulate matter have been identified for which permissible levels have been established. These include particulate matter of 10 microns in diameter or less (PM_{10}) and particulate matter of 2.5 microns in diameter or less ($PM_{2.5}$). See Section 3.C.2, Regulatory Framework, for further discussion of specific pollutants and their attainment status in the air basin with respect to state and federal air quality standards.

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4 Environmental burden is defined as a measurement of cumulative environmental and socioeconomic vulnerability. For more information, see *https://sfplanning.org/project/environmental-justice-framework-and-general-plan-policies#ej-communities*.

5 San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, September 2020.

The region's air quality monitoring network provides information on ambient concentrations of criteria air pollutants at various locations in the San Francisco Bay Area. **Table 3.C-1, Summary of San Francisco Air Quality Monitoring Data (2019–2023)** presents a 5-year summary for the period 2019 to 2023 of the highest annual criteria air pollutant concentrations collected at the air quality monitoring station operated and maintained by the air district at 16th and Arkansas streets in San Francisco's Potrero Hill neighborhood. Table 3.C-1 also compares measured pollutant concentrations with the national and state standards for each of the criteria air pollutants. Concentrations shown in bold indicate an exceedance of the standard for the air basin (see **Table 3.C-2, State and Federal Ambient Air Quality Standards and Attainment Status** for the air basin's attainment status for each criteria air pollutant). Table 3.C-1 does not include SO_2 because monitors are not required for the bay area because the air basin has never been designated as nonattainment for SO_2.

Table 3.C-1 Summary of San Francisco Air Quality Monitoring Data (2019–2023)

Pollutant	Most-Stringent Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured [1]				
		2019	2020	2021	2022	2023
Ozone						
Days 1-hour standard exceeded	—	0 [2]	0	0	0	0
Maximum 1-hour concentration (ppm)	>0.09 ppm [3]	0.091	0.088	0.074	0.070	0.057
Days 8-hour standard exceeded	—	1	0	0	0	0
Maximum 8-hour concentration (ppm)	>0.070 ppm [3,4]	0.074	0.056	0.061	0.061	0.046
Carbon Monoxide (CO)						
Days 1-hour standard exceeded	—	0	0	0	0	0
Maximum 1-hour concentration (ppm)	>20 ppm [3]	1.2	1.8	1.2	1.5	1.9
Days 8-hour standard exceeded	—	0	0	0	0	0
Maximum 8-hour concentration (ppm)	>9 ppm [3]	1.0	1.6	0.09	1.0	1.9
Suspended Particulates (PM_{10})						
Days 24-hour standard exceeded	—	0	2	0	0	0
Maximum 24-hour concentration ($\mu g/m^3$)	>50 $\mu g/m^3$ [3]	42.1	105.0	33.0	36.0	43.0
Suspended Particulates ($PM_{2.5}$)						
Days 24-hour standard exceeded	—	0	8	0	0	0
Maximum 24-hour concentration ($\mu g/m^3$)	>35 $\mu g/m^3$ [3]	25.4	147.3	22.4	29.0	16.7

Table 3.C-1 Summary of San Francisco Air Quality Monitoring Data (2019–2023)

Pollutant	Most-Stringent Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured [1]				
		2019	2020	2021	2022	2023
Annual average (µg/m³)	>12 µg/m³ [3,4,5]	7.7	10.5	7.1	6.8	5.4
Nitrogen Dioxide (NO_2)						
Days 1-hour standard exceeded	—	0	0	0	0	0
Maximum 1-hour concentration (ppm)	>0.100 ppm [4]	0.061	0.048	0.050	0.046	0.044

Sources: California Air Resource Board Top 4 Summary for the San Francisco Arkansas Street monitoring site, 2019–2023, https://www.arb.ca.gov/adam/topfour/topfour1.php.
United States Environmental Protection Agency Air Data Air Quality Monitors for Arkansas Street monitoring site, 2024, https://www.epa.gov/outdoor-air-quality-data/monitor-values-report.
Notes: **Bold** values are in excess of applicable standard.

[1] Number of days exceeded is for all days in a given year, except for particulate matter. PM10 is monitored every six days. Therefore, the number of days exceeded is out of approximately 60 annual samples.
[2] Measured maximum 1-hour ozone concentration in 2019 is not identified by air board as an exceedance of the California Ambient Air Quality standard.
[3] State standard, not to be exceeded.
[4] Federal standard, not to be exceeded.
[5] On February 7, 2024, the federal annual PM2.5¬ standard was revised from 12.0 µg/m3 to 9.0 µg/m3. However, since the data presented in Table 3.C-1 is through 2023, exceedances of the PM2.5¬are based on the 12.0 µg/m3 standard that was in effect through 2023.

— = not applicable
air board = California Air Resources Board
µg/m³ = micrograms per cubic meter
PM_{10} = particulate matter 10 microns in diameter or less
$PM_{2.5}$ = particulate matter 2.5 microns in diameter or less
ppm = parts per million

Table 3.C-2 State and Federal Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Time	State Standards [1]		Federal Standards [2]	
		Standard	Attainment Status	Standard	Attainment Status
Ozone	1 hour	0.09 ppm	**N**	NA	— [3]
	8 hours	0.07 ppm	**N** [4]	0.070 ppm	**N**
Carbon monoxide (CO)	1 hour	20 ppm	A	35 ppm	A
	8 hours	9 ppm	A	9 ppm	A
Nitrogen dioxide (NO_2)	1 hour	0.18 ppm	A	0.100 ppm	U
	Annual	0.030 ppm	NA	0.053 ppm	A

Table 3.C-2 State and Federal Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Time	State Standards [1]		Federal Standards [2]	
		Standard	Attainment Status	Standard	Attainment Status
Sulfur dioxide (SO_2)	1 hour	0.25 ppm	A	0.075	A
	24 hours	0.04 ppm	A	0.14	A
	Annual	NA	NA	0.03 ppm	A
Particulate matter (PM_{10})	24 hours	50 µg/m^3	**N**	150 µg/m^3	U
	Annual [5]	20 µg/m^3	**N**	NA	NA
Fine particulate matter ($PM_{2.5}$)	24 hours	NA	NA	35 µg/m^3	**N**
	Annual	12 µg/m^3	**N**	9 µg/m^3	U/A [6]
Sulfates	24 hours	25 µg/m^3	A	NA	NA
Lead	30 days	1.5 µg/m^3	A	NA	NA
	Calendar quarter [7]	NA	NA	1.5 µg/m^3	A
Hydrogen sulfide	1 hour	0.03 ppm	U	NA	NA
Visibility-reducing particles	8 hours	__ [8]	A	NA	NA

Source: Bay Area Air Quality Management District, *Standards and Attainment Status*, 2022, https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status, accessed January 17, 2024.
Notes: Attainment Status: A = Attainment; **N** = Nonattainment; U = Unclassified; NA = Not Applicable, no applicable standard

[1] State Standards = State ambient air quality standards (California). State standards for ozone, CO (except Lake Tahoe), SO2 (one-hour and 24-hour), NO2, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All other state standards shown are values not to be equaled or exceeded.

[2] Federal Standards = national ambient air quality standards. Federal standards, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The eight-hour ozone standard is attained when the three-year average of the fourth highest daily concentration is 0.08 ppm or less. The 24-hour PM10 standard is attained when the three-year average of the 99th percentile of monitored concentrations is less than the standard. The 24-hour PM2.5 standard is attained when the three-year average of the 98th percentile is less than the standard.

[3] The U.S. EPA revoked the national one-hour ozone standard on June 15, 2005.

[4] This state eight-hour ozone standard was approved in April 2005 and became effective in May 2006.

[5] State standard = annual geometric mean; national standard = annual arithmetic mean.

[6] In December 2012, the U.S. EPA strengthened the annual PM2.5 NAAQS from 15 to 12 µg/m^3. In December 2014, the U.S. EPA issued final area designations for the 2012 primary annual PM2.5 NAAQS. On February 7, 2024, the federal annual $PM_{2.5}$ standard was revised from 12.0 µg/m^3 to 9.0 µg/m^3. The U.S. EPA designates areas as either being in "attainment" or "nonattainment" of the NAAQS when they meet or exceed the standard for outdoor air quality. Once designations take effect, state and local governments with nonattainment areas must develop implementation plans outlining how areas will attain and maintain the standards by reducing air pollutant emissions. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels.

[7] Calendar quarter means any one of the following time periods during a given year: January 1 through March 31, April 1 through June 30, July 1 through September 30, or October 1 through December 31.

[8] Statewide visibility-reducing particle standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

µg/m^3 = micrograms per cubic meter
CO = carbon monoxide
NAAQS = National Ambient Air Quality Standards
NO_2 = nitrogen dioxide
PM_{10} = particulate matter less than 10 micrograms in diameter
$PM_{2.5}$ = particulate matter less than 2.5 micrograms in diameter
ppm = parts per million
SO_2 = sulfur dioxide
U.S. EPA = United States Environmental Protection Agency

The ambient air quality standards—both federal and state—are expressed as airborne concentrations of various pollutants. Compliance with the standards is on a regional basis. In the bay area, compliance is demonstrated by ongoing measurements of pollutant concentrations at more than 30 air quality monitoring stations operated by the air district in all nine bay area counties. An exceedance of an ambient air quality standard at any one of the stations counts as a regional exceedance.

National and state air quality standards have been set at levels considered safe to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. As explained by the air board, "[A]n air quality standard defines the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment."[6] That is, if a region is in compliance with the ambient air quality standards, its regional air quality can be considered protective of public health. The national air quality standards are statutorily required to be set by the U.S. EPA at levels that are "requisite to protect the public health."[7] Therefore, the closer a region is to attaining a particular standard, the lower the human health impact is from that pollutant.

A brief description of the health effects of exposure to criteria air pollutants is provided below.

Ozone

Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG; also sometimes referred to as volatile organic compounds [VOCs] by some regulating agencies) and nitrogen oxides (NO_X). The main sources of ROG and NO_X, often referred to as ozone precursors, are combustion processes (including motor vehicle engines) and the evaporation of solvents, paints, and fuels. In the bay area, automobiles are the single largest source of ozone precursors. Ozone is referred to as a regional criteria air pollutant because its precursors are transported and diffused by wind concurrently with ozone production through the photochemical reaction process. Ozone causes eye irritation, airway constriction, and shortness of breath, and can aggravate existing respiratory diseases, such as asthma, bronchitis, and emphysema.

Table 3.C-1 shows that according to published data at the air quality monitoring station, the most stringent applicable standard (the federal eight-hour standard of 7 parts per hundred million) was exceeded in San Francisco in 2019. The air quality monitoring station is near the northern boundary of the Potrero Hill neighborhood in San Francisco, which is adjacent to light industrial activities and residential neighborhoods, and is between two major roadways: U.S. 101 and I-280. Although the westerly wind sea breeze usually keeps pollution levels low, light wind conditions and surface-based inversions can result in elevated concentrations of ozone precursors.[8]

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6 California Air Resources Board, California Ambient Air Quality Standards, 2022, https://www.arb.ca.gov/research/aaqs/caaqs/caaqs.htm, accessed January 17, 2024.

7 See https://www.law.cornell.edu/uscode/text/42/7409

8 Bay Area Air Quality Management District, 2022 Annual Air Monitoring Network Plan, https://www.baaqmd.gov/~/media/files/technical-services/2022_network_plan-pdf.pdf?la=zh-tw, accessed January 17, 2024.

Carbon Monoxide

CO is an odorless, colorless gas usually formed as a result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles; the highest emissions occur during low travel speeds, stop-and-go driving, cold starts, and hard acceleration. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood, and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest pain) in persons with serious heart disease. Very high levels of CO can be fatal. As shown in Table 3.C-1, the more stringent state CO standards were not exceeded between 2019 and 2023.

Particulate Matter (PM_{10} and $PM_{2.5}$)

Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from man-made and natural sources. Particulate matter regulated by the state and federal Clean Air Acts is measured in two size ranges: PM_{10} for particles less than 10 microns in diameter, and $PM_{2.5}$ for particles less than 2.5 microns in diameter. In the bay area, motor vehicles generate about one-half of the air basin's particulates through tailpipe emissions as well as brake pad and tire wear. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. According to the air board, studies in the United States and elsewhere, "have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks," and studies of children's health in California have demonstrated that particle pollution "may significantly reduce lung function growth in children." The air board also reports that statewide attainment of particulate matter standards could prevent thousands of premature deaths, lower hospital admissions for cardiovascular and respiratory disease and asthma-related emergency room visits, and avoid hundreds of thousands of episodes of respiratory illness in California. Among the criteria air pollutants that are regulated, particulates appear to represent a serious ongoing health hazard. In 1999, the air district reported in its CEQA air quality guidelines that studies had shown that elevated particulate levels contribute to the death of approximately 200 to 500 people per year in the bay area. High levels of particulate matter can exacerbate chronic respiratory ailments, such as bronchitis and asthma, and have been associated with increased emergency room visits and hospital admissions.

$PM_{2.5}$ is of particular concern because epidemiologic studies have demonstrated that people who live near freeways and high-traffic roadways have poorer health outcomes, including increased asthma symptoms and respiratory infections, and decreased pulmonary function and lung development in children.[9] New studies are also showing that long-term average exposure to $PM_{2.5}$ is associated with an increased risk of death from the novel coronavirus 2019 disease (COVID-19) in the United States. One study found that an increase of 1 $\mu g/m^3$ in $PM_{2.5}$ is associated with an 8 percent increase in the COVID-19 death rate.[10] Exposure to wildfire smoke (which includes $PM_{2.5}$) experienced by Californians in 2020

[9] San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effect from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

[10] Wu, X., R.C. Nethery, B.M. Sabath, D. Braun, and F. Dominici, *Exposure to Air Pollution and COVID-19 Mortality in the United States*, November 4, 2020, Science Advances, Vol. 6, Issue 45, *https://www.science.org/doi/10.1126/sciadv.abd4049*, accessed January 17, 2024.

also could have contributed to increased cases of COVID-19.[11] These studies all demonstrate a correlational relationship between exposure to $PM_{2.5}$ and increases in the COVID-19 death rate, not a causal relationship.

Table 3.C-1 shows that the state 24-hour PM_{10} standard of 50 µg/m^3 was exceeded twice in 2020, but was not exceeded in 2019, 2021, 2022, or 2023. The federal 24-hour $PM_{2.5}$ standard was exceeded 8 days in 2020, but was not exceeded in 2019, 2021, 2022, or 2023. The state and federal annual average standard of 12 µg/m^3 was not exceeded between 2019 and 2023. On February 7, 2024, the federal annual $PM_{2.5}$ standard was revised from 12.0 µg/m^3 to 9.0 µg/m^3. However, since the data presented in Table 3.C-1 is through 2023, exceedances of $PM_{2.5}$ are based on the 12.0 µg/m^3 standard that was in effect through 2023. Within 2 years of setting new or revised NAAQS, the Clean Air Act requires the U.S. EPA to designate areas as meeting (attainment) or not meeting (nonattainment) the standard. After a new or revised NAAQS has been issued, the Clean Air Act requires States to submit initial area designation recommendations within 12 months. The U.S. EPA's final designations are based on: 1) the most recent 3 years of ambient air quality monitoring data; 2) recommendations submitted by the States; and 3) other technical information. If the U.S. EPA plans to issue a designation that modifies a state recommendation, the U.S. EPA must notify the state no later than 120 days before the final designation.

Nitrogen Dioxide

NO_2 is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to ozone formation, NO_2 can increase the risk of acute and chronic respiratory disease and reduce visibility. NO_2 may be visible as a coloring component on high pollution days, especially in conjunction with high ozone levels. In 2010, the U.S. EPA implemented a new one-hour NO_2 standard presented in Table 3.C-2. On November 15, 2012, the air board approved a revision to the State Implementation Plan for implementing the 2010 federal NO_2 standards. All areas in California are designated as attainment/unclassified for the federal NO_2 standards.[12] Table 3.C-1 shows the federal standard was not exceeded at the San Francisco station between 2019 and 2023.

U.S. EPA also has established requirements for a new monitoring network to measure NO_2 concentrations near major roadways in urban areas with a population of 500,000 or more. Sixteen new near-roadway monitoring sites are required in California, three of which are in the bay area. These monitors are in Berkeley, Oakland, and San Jose. The Oakland station commenced operation in February 2014, the San Jose station commenced operation in March 2015, and the Berkeley station commenced operation in July 2016. The new monitoring data have not resulted in a need to change area attainment designations.[13]

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11 Xiaodan Zhou, Kevin Josey, Leila Kamareddine, Miah C. Caine, Tianjia Liu, Loretta J. Mickley, Matthew Cooper, and Francesca Dominici, *Excess of COVID-19 Cases and Deaths due to Fine Particulate Matter Exposure During the 2020 Wildfires in the United States*, August 13, 2021, *https://pubmed.ncbi.nlm.nih.gov/34389545/,* accessed January 17, 2024.

12 California Air Resources Board, *State Implementation Plan Revision for Federal Nitrogen Dioxide Standard Infrastructure Requirements*, October 2012, *https://ww2.arb.ca.gov/sites/default/files/2022-12/no2isip.pdf*, accessed January 17, 2024.

13 Bay Area Air Quality Management District, 2013 Air Monitoring Network Plan, July 2014, *https://www.baaqmd.gov/about-air-quality/air-quality-measurement/ambient-air-monitoring-network*, accessed January 17, 2024.

Sulfur Dioxide

SO_2 is a colorless acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO_2 has the potential to damage materials, and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease.[14] SO_2 monitoring was terminated at the San Francisco station in 2009, because the state standard for SO_2 is being met in the bay area, and pollutant trends suggest that the air basin will continue to meet this standard for the foreseeable future.

In 2010, the U.S. EPA implemented a new one-hour SO_2 standard presented in Table 3.C-2. The U.S. EPA has initially designated the air basin as an attainment area for SO_2. Similar to the federal standard for NO_2, the U.S. EPA has established requirements for a new monitoring network to measure SO_2 concentrations.[15] No additional SO_2 monitors are required for the bay area because the air basin has never been designated as nonattainment for SO_2, and no State Implementation Plan or maintenance plans have been prepared for SO_2.[16]

Lead

Leaded gasoline (phased out in the United States beginning in 1973), paint (on older houses and cars), smelters (metal refineries), and manufacture of lead storage batteries have been the primary sources of lead released into the atmosphere. Lead has a range of adverse neurotoxic health effects, which put children at special risk. Some lead-containing chemicals cause cancer in animals. Lead levels in the air have decreased substantially since leaded gasoline was eliminated. Ambient lead concentrations are only monitored on an as-warranted, site-specific basis in California. On October 15, 2008, the U.S. EPA lowered the national air quality standards for lead from 1.5 $\mu g/m^3$ to 0.15 $\mu g/m^3$. The U.S. EPA revised the monitoring requirements for lead in December 2010. These requirements focus on airports and large urban areas, resulting in an increase in 76 monitors nationally.[17] Lead monitoring stations in the bay area are at Palo Alto Airport, Reid-Hillview Airport (San Jose) and San Carlos Airport. Nonairport locations for lead monitoring are in Redwood City and San Jose.

Air Quality Index

The U.S. EPA developed the Air Quality Index (AQI) scale to make the public health impacts of air pollution concentrations easily understandable. The AQI, much like an air quality "thermometer," translates daily air pollution concentrations into a number on a scale between 0 and 500. The numbers in the scale are divided into six color-coded ranges, with numbers 0 to 300, as outlined below:

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14 Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines Appendix A: Thresholds of Significance Justification*, April 2023, p. A-62, *https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance-justification_final-pdf.pdf?la=en*, accessed January 17, 2024.

15 United States Environmental Protection Agency (U.S. EPA), *Fact Sheet: Revisions to the Primary National Ambient Air Quality Standard, Monitoring Network, and Data Reporting Requirements for Sulfur Dioxide*, May 2016, *https://www.epa.gov/sites/default/files/2016-05/documents/final_primary_naaqs_factsheet.pdf*, accessed January 17, 2024.

16 Bay Area Air Quality Management District, *2012 Air Monitoring Network Plan*, July 1, 2013, p. 30, *https://www.baaqmd.gov/~/media/files/technical-services/2012_network_plan.pdf?la=en*, accessed January 17, 2024.

17 U.S. EPA, Fact Sheet: Revisions to Lead Ambient Air Quality Monitoring Requirements, March 2016, https://www.epa.gov/sites/default/files/2016-03/documents/leadmonitoring_finalrule_factsheet.pdf, accessed January 17, 2024.

- **Green (0 to 50)** indicates "good" air quality. No health impacts are expected when air quality is in the green range.
- **Yellow (51 to 100)** indicates air quality is "moderate." Unusually sensitive people should consider limited prolonged outdoor exertion.
- **Orange (101 to 150)** indicates air quality is "unhealthy for sensitive groups." Active children and adults, and people with respiratory disease, such as asthma, should limit outdoor exertion.
- **Red (151 to 200)** indicates air quality is "unhealthy." Active children and adults, and people with respiratory disease, such as asthma, should avoid prolonged outdoor exertion; everyone else, especially children, should limit prolonged outdoor exertion.
- **Purple (201 to 300)** indicates air quality is "very unhealthy." Active children and adults, and people with respiratory disease, such as asthma, should avoid prolonged outdoor exertion; everyone else, especially children, should limit outdoor exertion.

The AQI numbers refer to specific amounts of pollution in the air; they are based on the federal air quality standards for ozone, CO, NO_2, SO_2, PM_{10}, and $PM_{2.5}$. In most cases, the federal standard for these air pollutants corresponds to the number 100 on the AQI chart. If the concentration of any of these pollutants rises above its respective standard, it can be unhealthy for the public. In determining the air quality forecast, local air districts use the anticipated concentration measurements for each of the major pollutants, convert them into AQI numbers, and determine the highest AQI for each zone in a district.

Readings below 100 on the AQI scale would not typically affect the health of the general public, although readings in the moderate range of 50 to 100 may affect unusually sensitive people. Levels above 300 rarely occur in the United States, and readings above 200 have not occurred in the bay area in decades, with the exception of the October 2017 and November 2018 wildfires north of San Francisco and the August/September 2020 complex wildfires that occurred throughout the bay area.[18] Wildfires appear to be occurring with increasing frequency in California and the bay area as the climate changes (since 2000, 18 of the state's 20 largest wildfires and 18 of the state's 20 most destructive fires on record have occurred).[19]

As a result, the AQI in several neighboring counties reached the "very unhealthy" and "hazardous" designations, ranging from values of 201 to above 350. During those periods, the air district issued "Spare the Air" alerts and recommended that individuals stay inside with windows closed and refrain from significant outdoor activity.

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[18] Bay Area Air Quality Management District, Current Air Quality, n.d., *http://www.baaqmd.gov/about-air-quality/current-air-quality*, accessed January 17, 2024.

[19] Cal Fire, Stats & Events, Top 20 Largest California Wildfires, January 13, 2022, *https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/featured-items/top20_acres.pdf?rev=be2a6ff85932475e99d70fa9458dca79&hash=A355A978818640DFACE7993C432ABF81* and Top 20 Most Destructive California Wildfires, January 17, 2024, *https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/featured-items/top20_deadliest.pdf?rev=e201e407ab6943c7854c7c917c7b818b&hash=8068F655A48FC601C6E2F55F9E0A1682*, accessed January 17, 2024.

AQI statistics over recent years indicate that air quality in the bay area is predominantly in the "Good" or "Moderate" categories, and healthy on most days for most people. Historical air district data indicate that the air basin experienced air quality in the red level (unhealthy) on 66 days between 2017 and 2021. As shown in **Table 3.C-3, Air Quality Index Statistics for the Project Area** the region near the project, as measured at the Arkansas Street monitoring station, had a total of 21 red-level or orange-level (unhealthy or unhealthy for sensitive groups) days between 2018 and 2022. A number of these days are attributable to the increasing frequency of wildfires in California. This table also shows that the area experienced only one purple level (very unhealthy) day between 2018 and 2022.[20]

Table 3.C-3 Air Quality Index Statistics for the Project Area

AQI Statistics for Air Basin	Number of Days by Year				
	2018	2019	2020	2021	2022
Unhealthy for sensitive groups (orange)	1	1	3	0	0
Unhealthy (red)	11	0	5	0	0
Very unhealthy (purple)	1	0	0	0	0

Source: Air district, 2024. Air Quality Index High Conditions for San Francisco – Arkansas Street, 2018-2022

Toxic Air Contaminants and Local Health Risks and Hazards

In addition to criteria air pollutants, plans and individual projects may directly or indirectly emit TACs. TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., long-duration) and acute (i.e., severe but short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards, but instead are regulated by the air district using a risk-based approach to determine which sources and pollutants to control, as well as the degree of control. An HRA is an analysis in which human health exposure to toxic substances is estimated and considered together with information regarding the toxic potency of the substances to provide quantitative estimates of health risks.[21]

Exposure assessment guidance published by the air district in their CEQA Air Quality Guidelines assumes that residences would be exposed to air pollution from an emissions source 24 hours per

[20] Bay Area Air Quality Management District, Monthly Air Quality Index for Coast & Central Bay, 2021, *https://www.baaqmd.gov/about-air-quality/current-air-quality/air-monitoring-data/#/aqi-highs?date=2021-12-02&view=monthly*, accessed January 17, 2024.

[21] In general, an HRA is required if the air district concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant of the project that would emit TACs is required to conduct an HRA for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

day, 350 days per year, for 30 years.[22] In addition, the HRA typically assumes a starting exposure age of third trimester in utero, which includes the highest age sensitivity factor of any age group. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups. This air district guidance is consistent with that of OEHHA published in 2015.

Exposure to $PM_{2.5}$ is strongly associated with mortality, respiratory diseases, and reductions in lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.[23] In addition to $PM_{2.5}$, diesel particulate matter (DPM) is also of concern. The air board identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.[24] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In addition to monitoring criteria air pollutants, both the air district and the air board operate TAC monitoring networks in the air basin. These stations measure 10 to 15 TACs, depending on the specific station. The TACs selected for monitoring are those that have traditionally been found in the highest concentrations in ambient air, and therefore tend to produce the most substantial risk. The nearest air district ambient TAC monitoring station to the proposed project site is the station at 16th and Arkansas streets in San Francisco. **Table 3.C-4, Annual Average Ambient Concentrations of Carcinogenic Toxic Air Contaminants Measured at Air District Monitoring Station in 2022, 10 Arkansas Street, San Francisco** shows ambient concentrations of carcinogenic TACs measured at the Arkansas Street station, as well as the estimated cancer risks from a lifetime exposure (70 years) to these substances for the year 2022—the most recent data-year available. When TAC measurements at this station are compared to ambient concentrations of various TACs for the bay area as a whole, the cancer risks associated with mean TAC concentrations in San Francisco are similar to those for the region.

[22] Bay Area Air Quality Management District, California Environmental Quality Act Air Quality Guidelines, Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards. April 25, 2023, p. E-102, *https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines*, accessed January 17, 2024.

[23] San Francisco Department of Public Works, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 6, 2008.

[24] California Air Resources Board, *Fact Sheet: The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-Fueled Engines*, October 1998.

Table 3.C-4 Annual Average Ambient Concentrations of Carcinogenic Toxic Air Contaminants Measured at Air District Monitoring Station in 2022, 10 Arkansas Street, San Francisco

Substance	Concentration	Cancer Risk
Gaseous TACs	(ppb)	(per Million)
Acetaldehyde	0.41	6
Benzene	0.10	26
1,3-Butadiene	0.022	24
Carbon tetrachloride	0.062	48
Formaldehyde	1.15	24
Perchloroethylene	0.008	0.9
Methylene chloride	0.071	0.7
Chloroform	0.014	1
Trichloroethylene	0.01	0.3
Particulate TACs	(ng/m^3)	(per Million)
Chromium (hexavalent)	0.053	4.3
Total Risk for all TACs	**N/A**	**135.2**

Source: California Air Resources Board, Ambient Air Toxics Summary, 2022, http://www.arb.ca.gov/adam/toxics/sitesubstance.html, accessed January 17, 2024.
ng/m^3 = nanograms per cubic meter
ppb = part per billion
TACs = toxic air contaminants

Roadway-Related Pollutants

Motor vehicles are responsible for a large share of air pollution, especially in California. Vehicle tailpipe emissions contain diverse forms of particles and gases, and also contribute to particulates by generating road dust and through brake and tire wear. Epidemiologic studies have demonstrated that people living in proximity to freeways or busy roadways have poorer health outcomes, including increased asthma symptoms and respiratory infections, and decreased pulmonary function and lung development in children. Air pollution monitoring conducted in conjunction with epidemiologic studies has confirmed that roadway-related health effects vary with modeled exposure to particulate matter and NO_2. In traffic-related studies, the additional noncancer health risk attributable to roadway proximity was seen within 1,000 feet of the roadway and was strongest within 300 feet.[25]

[25] California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005, *http://www.arb.ca.gov/ch/ handbook.pdf*.

Diesel Particulate Matter

The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Mobile sources, such as trucks and buses, are among the primary sources of diesel emissions, and concentrations of DPM are higher near heavily traveled highways. The air board estimated average bay area cancer risk from exposure to DPM, based on a population-weighted average ambient DPM concentration, at about 480 per 1 million as of the year 2000, which is much higher than the risk associated with any other toxic air pollutant routinely measured in the region. The statewide risk from DPM, as determined by the air board, declined from 750 per 1 million in 1990 to 570 per 1 million in 1995; by 2000, the air board estimated the average statewide cancer risk from DPM at 540 per 1 million.[26,27]

San Francisco Modeling of Air Pollutant Exposure Zones

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the air district to inventory and assess air pollution and exposure from mobile, stationary, and area sources in San Francisco. This analysis, known as the 2020 Citywide HRA, is documented in the San Francisco Citywide Health Risk Assessment: Technical Support Documentation.[28] Areas with poor air quality, referred to as the air pollutant exposure zone, or APEZ, were identified based on the following health-protective criteria: (1) excess cancer risk greater than 100 per 1 million population from the contribution of emissions from all modeled sources; or (2) cumulative $PM_{2.5}$ concentrations greater than 10 $\mu g/m^3$. The APEZ is expanded in certain geographic health vulnerable areas of the City, primarily the Bayview, Tenderloin, and much of the South of Market area, to be more protective, with the areas included in the APEZ based on a standard that is 10 percent more stringent than elsewhere in the City (i.e., areas where the excess cancer risk exceeds 90 per 1 million or the $PM_{2.5}$ concentration exceeds 9 $\mu g/m^3$). The project site is in ZIP code 94123, which is not identified as a health vulnerable area; however, the project site is within the APEZ. The APEZ also includes all parcels within 500 feet of a freeway. The APEZ is based on modeling that was prepared using a 20-meter by 20-meter receptor grid covering the entire City. The following summarizes the evidence supporting the APEZ criteria followed by a discussion of major sources of emissions in and near the proposed project.

Excess Cancer Risk

The greater than 100 per 1 million persons exposed (100 per 1 million excess cancer risk) criterion for defining the APEZ is based on the U.S. EPA's guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.[29] As described by the air district, the U.S. EPA considers a cancer risk of 100 per 1 million to be within the "acceptable" range of cancer

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26 California Air Resources Board, California Almanac of Emissions and Air Quality – 2009 Edition, Table 5-44 and Figure 5-12.

27 This calculated cancer risk value from ambient air exposure in the bay area can be compared against the lifetime probability of being diagnosed with cancer in the United States, from all causes, which is more than 40 percent (based on a sampling of 17 regions nationwide), or greater than 400,000 per 1 million, according to the American Cancer Society. (American Cancer Society, Lifetime Probability of Developing or Dying from Cancer, last revised July 13, 2009, https://www.cancer.org/cancer/cancer-basics/lifetime-probability-of-developing-or-dying-froM-Cancer.html, accessed January 17, 2024.

28 San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, September 2020.

29 Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines, Appendix A: Thresholds of Significance Justification*, April 20, 2023, p. A-42, accessed January 17, 2024.

risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants rulemaking,[30] the U.S. EPA states that it "… strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one per 1 million; and (2) limiting to no higher than approximately one in ten thousand [100 per 1 million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per 1 million excess cancer risk is also consistent with the ambient cancer risk in the most pristine portions of the bay area, based on the air district's regional modeling.[31]

Fine Particulate Matter

In April 2011, the U.S. EPA published Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards(NAAQS). In this document, the U.S. EPA concludes that the then-current federal annual $PM_{2.5}$ standard of 15 µg/m^3 should be revised to a level in the range of 13 to 11 µg/m^3, with evidence strongly supporting a standard in the range of 12 to 11 µg/m^3. In December 2012, the U.S. EPA lowered the annual $PM_{2.5}$ standard from 15 to 12 µg/m^3, and issued final area designations based on that standard. On February 7, 2024, the U.S. EPA published the Final Rule: Reconsideration of the NAAQS for particulate matter.[32] In this reconsideration document, the U.S. EPA lowered the primary annual $PM_{2.5}$ standard from 12 µg/m^3 to 9 µg/m^3. As discussed below, the APEZ for San Francisco's health vulnerable locations is based on the health protective $PM_{2.5}$ standard of 9 µg/m^3, and a standard of 10 µg/m^3 for all other areas.

Health-Vulnerable Locations

Based on the air district's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94110, 94124, and 94130) in the worst quintile of Bay Area health vulnerability scores as a result of air pollution-related causes were afforded additional protection by lowering the standards for identifying parcels in the air pollutant exposure zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) $PM_{2.5}$ concentrations in excess of 9 µg/m^3.[33]

Proximity to Freeways

According to the air board, studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses near freeways increases both exposure to air pollution and the potential for adverse health effects. As evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at an increased health risk from air pollution,[34] parcels that are within 500 feet of freeways are included in the APEZ.

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30 54 *Federal Register* 38044, September 14, 1989.

31 Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines, Appendix A: Thresholds of Significance Justification*, April 20, 2023, p. A-42, accessed January 17, 2024.

32 40 CFR Parts 50, 53, and 58, February 7, 2024.

33 San Francisco Planning Department and San Francisco Department of Public Health, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, September 2020.

34 California Air Resources Board, *Air Quality and Land Use Handbook: A Community Health Perspective*. April 2005, *http://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf*, accessed January 17, 2024.

Air Pollution Sources Near the Project Site

Within 1,000 feet of the project site, the existing modeled cancer risk ranges from 30 to over 100 per 1 million.[35] Existing annual average $PM_{2.5}$ concentrations within 1,000 feet of the project site range from 7.90 µg/m^3 to 9.99 µg/m^3.

Air pollution sources that were evaluated in the 2020 Citywide HRA and that contribute to emissions in and near the project site area are described below.

Stationary Sources

The air district's inventory of permitted stationary sources of emissions includes gasoline dispensing stations, prime and standby diesel generators, wastewater treatment plants, recycling facilities, dry cleaners, large boilers, and other industrial facilities. There are several permitted stationary emission sources present near the project site, including standby generators and gasoline stations.

Traffic on Major Roadways

Traffic contributes to elevated concentrations of $PM_{2.5}$, DPM, and other contaminants emitted from motor vehicles near the street level. Roadways likely to carry more than 10,000 average daily traffic in the vicinity of the project site include Marina Boulevard, Laguna Street north of Bay Street, Bay Street, Van Ness Avenue, and Lombard Street. The large concentration of high-volume roadways is a major reason for the inclusion of the project site and surrounding area in the APEZ.

Sensitive Receptors

Air quality does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Population subgroups sensitive to the health effects of air pollutants include the elderly and the young, population subgroups with higher rates of respiratory disease such as asthma and chronic obstructive pulmonary disease, and populations with other environmental or occupational health exposures (e.g., indoor air quality) that affect cardiovascular or respiratory diseases such as asthma and chronic obstructive pulmonary disease. The factors responsible for variation in exposure are also often similar to factors associated with greater susceptibility to air quality health effects. For example, lower income residents may be more likely to live in substandard housing and be more likely to live near industrial or roadway sources of air pollution.

The air district defines sensitive receptors as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with preexisting serious health issues affected by air quality.[36] Land uses such as schools, children's daycare centers, hospitals, and nursing and convalescent homes are considered to be sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress. Residential areas are considered more sensitive to air quality conditions compared to commercial and industrial areas because people generally spend longer periods of time at their residences, with associated greater exposure to ambient air quality conditions.

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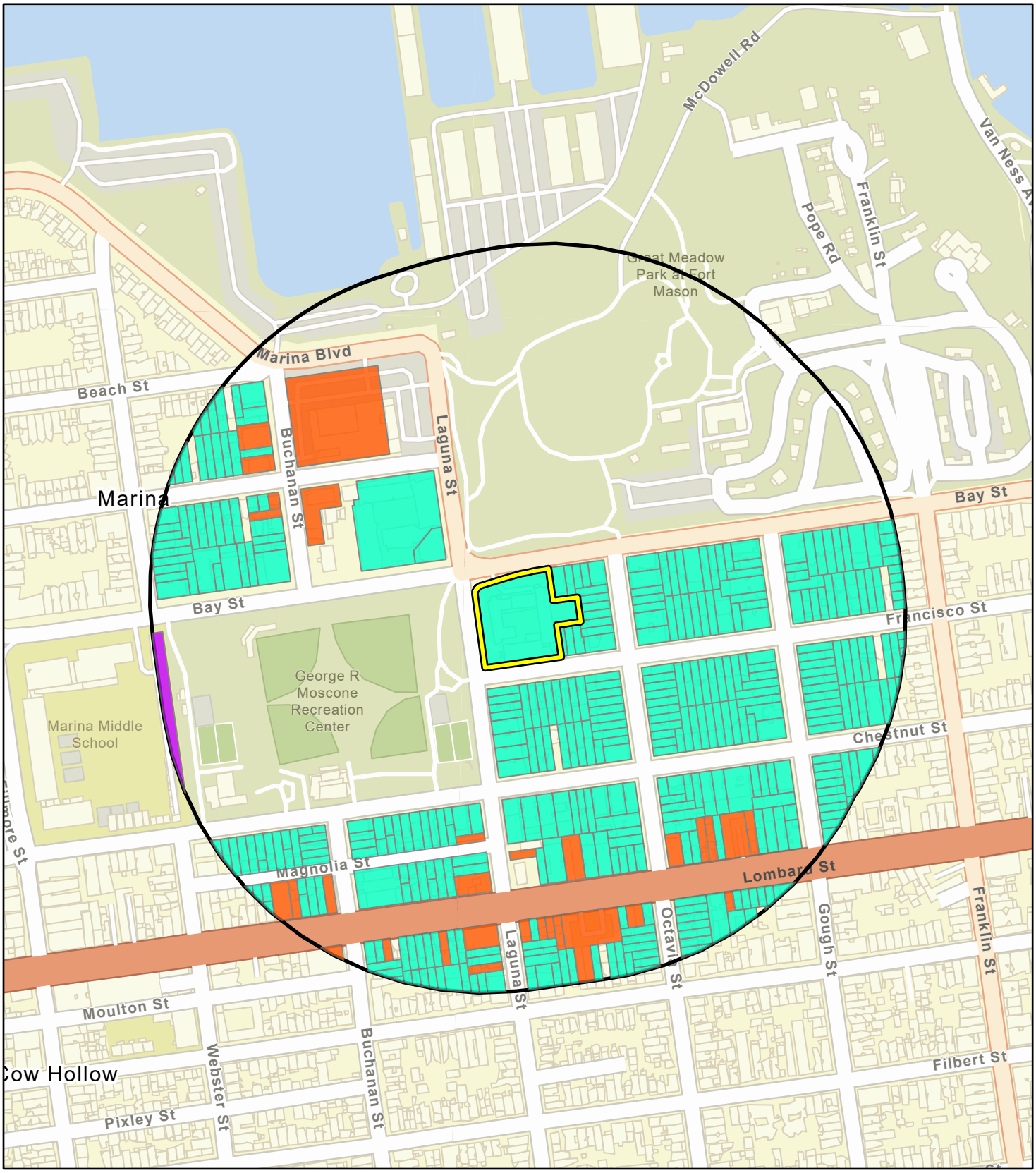
[35] San Francisco Department of Public Health, San Francisco Planning Department, and Ramboll, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, September 2020.

[36] Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines, Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards*. April 25, 2023, p. E-14, *https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines*, accessed January 17, 2024.

Offsite workers may not always be considered sensitive receptors because all employers must follow regulations set forth by the Occupational Safety and Health Administration to ensure the health and well-being of their employees. However, for the purposes of this EIR, offsite workers (workers near a proposed project) are conservatively considered sensitive receptors in this analysis. **Figure 3.C-1** shows the location of sensitive receptors within 1,000 feet of the project site.

The surrounding uses in the project vicinity include a mixture of single- and multi-family residential, public, and commercial uses. The nearest off-site residential receptors to the project site are located immediately adjacent to the project site's eastern border. The closest off-site childcare receptor is Ladybug Childcare and Preschool, located approximately 420 feet east of the project site. The closest off-site school receptor is Marina Middle School, located approximately 960 feet west of the project site. Additionally, existing residents and workers on site are also considered sensitive receptors for purposes of this analysis, as they would remain onsite during the project's construction activities.



SOURCE: Esri World Street Map (2024)

FIGURE 3.C-1

3400 Laguna Street Project

Map of Sensitive Receptors Within
1,000 Feet of the Project Site

Odors

Sources that typically generate odors include wastewater treatment and pumping facilities; landfills, transfer stations, and composting facilities; petroleum refineries, asphalt batch plants, chemical (including fiberglass) manufacturing, and metal smelters; painting and coating operations; rendering plants; coffee roasters and food processing facilities; and animal feed lots and dairies. The project site is not located in an area with these types of uses.

3.C.2 Regulatory Framework

Federal Regulations

The 1970 Clean Air Act (most recently amended in 1990) requires that regional planning and air pollution control agencies prepare a regional air quality plan to outline the measures by which both stationary and mobile sources of pollutants will be controlled to achieve all standards by the deadlines specified in the act. These ambient air quality standards are intended to protect the public health and welfare, and they specify the concentration of pollutants (with an adequate margin of safety) to which the public can be exposed without adverse health effects. They are designed to protect those segments of the public most susceptible to respiratory distress, including asthmatics, the very young, the elderly, people weakened from other illness or disease, or persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollution levels that are somewhat above ambient air quality standards before adverse health effects are observed.

The current attainment status for the air basin, with respect to federal standards, is summarized in Table 3.C-2. In general, the air basin experiences low concentrations of most pollutants when compared to federal standards, except for PM_{10}, $PM_{2.5}$, and ozone, for which standards are exceeded periodically (see Table 3.C-1).

The air basin is currently designated as an unclassifiable/attainment area (an area that has monitoring data that show the standard is met and not contributing to a nearby violation) with respect to the federal annual average $PM_{2.5}$ standard. As discussed above, on February 7, 2024, the federal annual $PM_{2.5}$ standard was revised from 12.0 µg/m^3 to 9.0 µg/m^3. Within 2 years of setting new or revised NAAQS, the Clean Air Act requires the U.S. EPA to designate areas as meeting (attainment) or not meeting (nonattainment) the standard, at which time the air basin will be designated as either attainment or nonattainment of the recently revised annual average standard of 9.0 µg/m^3.

State Regulations

Although the federal Clean Air Act established national ambient air quality standards, individual states retained the option to adopt more stringent standards, and to include other pollution sources. California had already established its own air quality standards when federal standards were established, and because of the unique meteorological challenges in California, there are many differences between the state and national ambient air quality standards, as shown in Table 3.C-2. California ambient standards tend to be at least as protective as national ambient standards and are often more stringent.

In 1988, California passed the California Clean Air Act (California Health and Safety Code section 39600 et seq.), which, like its federal counterpart, called for the designation of areas as attainment or nonattainment, but based on state ambient air quality standards rather than the federal standards.

As indicated in Table 3.C-2, the air basin is designated as "nonattainment" for state ozone, PM_{10}, and $PM_{2.5}$ standards. The air basin is designated as "attainment" for other pollutants.

Toxic Air Contaminants

In 2005, the air board approved a regulatory measure to reduce emissions of toxic and criteria air pollutants by limiting the idling of new heavy-duty diesel vehicles. The regulations generally limit idling of commercial motor vehicles (including buses and trucks) within 100 feet of a school or residential area for more than five consecutive minutes, or periods aggregating more than five minutes in any one hour. Buses or vehicles also must turn off their engines upon stopping at a school and must not turn on their engines more than 30 seconds before beginning to depart from a school. Also, Senate Bill 352, adopted in 2003, limits locating public schools within 500 feet of a freeway or busy traffic corridor.

The air board has also adopted rules for new diesel trucks and for off-road diesel equipment. Along with rules adopted by the U.S. EPA, these regulations have resulted in substantially more stringent emissions standards for new diesel trucks and new off-road diesel equipment, such as construction vehicles. Each of these regulations is further described below.

Nonroad Engine Pollution Control Standards: Tier 4 Off-Road Compression-Ignition Regulations

Effective January 2011, both the U.S. EPA and the air board adopted so-called Interim Tier 4 standards for new equipment with diesel engines of 175 horsepower (hp) or greater. The interim Tier 4 emissions standards for particulate matter are about 85 percent more restrictive than previous particulate matter emissions standards (Tier 2 or Tier 3, depending on the size of the engine[37]) for these larger off-road engines. As a result, use of engines that meet the interim Tier 4 standards would reduce diesel exhaust emissions of particulate matter by approximately 85 percent, compared to new engines produced under the previous standards. Tier 4 Final standards are required for new off-road engines, depending on engine size, for all model years starting in 2014 or 2015. Compared to Tier 4 Interim standards, Tier 4 Final standards are about 80 percent more restrictive for NO_X emissions and 30 percent more restrictive for PM emissions. As a result, use of engines that meet the Tier 4 Final standards would reduce exhaust emissions of NO_X by approximately 80 percent, and reduce diesel exhaust emissions of PM by approximately 30 percent compared to new engines produced under Tier 4 Interim standards.[38]

In-Use Off-Road Diesel-Fueled Fleets Regulation

Regarding equipment already in use, the air board adopted rules for in-use off-road diesel vehicles—including construction equipment—in 2007, most recently amended in November 2022. Beginning in 2014, air board regulations required off-road equipment fleets to begin gradual replacement of older engines with newer, cleaner engines; the installation of exhaust filters on remaining older engines; or some combination of the two to achieve fleet-wide emissions reductions. Those rules also limit idling to 5 minutes; and require a written idling policy for larger vehicle fleets, fleet operators to provide information on their engines to the air board, and vehicles to be labeled with an air board-issued

[37] For most construction equipment other than that with extremely powerful engines (greater than 750 hp), Tier 2 and Tier 3 emissions standards are the same with respect to PM. Therefore, cancer risk from DPM—a subset of all particulate matter—is essentially the same for Tier 2 and Tier 3 engines.

[38] California Air Resources Board, Non-road Diesel Engine Certification Tier Chart, https://ww2.arb.ca.gov/resources/documents/non-road-diesel-engine-certification-tier-chart, accessed January 17, 2024.

vehicle identification number. The off-road rules require the retrofit or replacement of diesel engines in existing equipment. For example, Tier 2 or Tier 3 engines (for larger equipment, those manufactured since 2006) can achieve generally the same reduction in PM emissions through retrofitting by installing a diesel particulate filter (an air board-certified Level 3 Verified Diesel Emissions Control System). As amended, the start of repowering began in 2014 for large fleets, 2017 for medium-size fleets, and 2019 for small fleets.[39] The most recent amendments require the phase-out of the oldest and highest-emitting off-road engines from operation in California through the year 2036, the details of which are dependent upon the equipment tier and fleet size; restrict the addition of vehicles with Tier 3 and Tier 4 interim engines through the year 2035, which is an expansion of provisions of the regulation prior to amendment; require contracting entities to obtain and retain a fleet's valid Certificate of Reported Compliance prior to awarding a contract or hiring a fleet beginning in 2024; and, beginning in 2024, mandate the use of renewable diesel (either "R99" or "R100") for all fleets.[40] According to the air board, the recent amendments would achieve a reduction above and beyond the previous regulation of approximately 31,087 tons of NO_X and 2,717 tons of fine particle pollution. Because only a certain percentage of each fleet's engines must be replaced or retrofitted on an annual or periodic basis to achieve the required emissions reductions, and because fleet turnover of heavy-duty off-road equipment takes many years, the full effect of the regulations on emissions reduction is not anticipated to be realized until sometime between 2024 and 2038, depending on the engine size and pollutant.[41]

Regional and Local Regulations

Bay Area Air Quality Planning

Air quality plans developed to meet federal requirements are referred to as State Implementation Plans. The federal and state Clean Air Acts require plans to be developed for areas designated as nonattainment (with the exception of areas designated as nonattainment for the state PM_{10} standard).

The air district's *2017 Clean Air Plan: Spare the Air, Cool the Climate* was adopted on April 19, 2017, by the air district in cooperation with the Metropolitan Transportation Commission, the San Francisco Bay Conservation and Development Commission, and the Association of Bay Area Governments to provide a regional strategy to improve bay area air quality and meet public health goals.[42] The control strategy described in the 2017 Clean Air Plan includes a wide range of control measures designed to reduce emissions and lower ambient concentrations of harmful pollutants, safeguard public health by reducing exposure to air pollutants that pose the greatest health risk, and reduce GHG emissions to protect the climate.

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39 Fleet size is based on total horsepower: large fleets are those with more than 5,000 hp, medium fleets have 2,501 to 5,000 hp, and small fleets are those with less than 2,500 hp.

40 Renewable diesel is a synthetic diesel fuel, produced from nonpetroleum renewable resources and providing substantial reductions in emissions compared to petroleum diesels. R99 means 99 percent renewable diesel and 1 percent petroleum diesel; R100 is 100 percent renewable diesel.

41 California Air Resources Board, Overview of Proposed Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation," October 2022 *https://ww2.arb.ca.gov/resources/fact-sheets/overview-proposed-amendments-use-road-diesel-fueled-fleets-regulation*, accessed January 17, 2024.

42 Bay Area Air Quality Management District, 2017 Clean Air Plan: Spare the Air, Cool the Climate, April 19, 2017, http://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en, accessed January 17, 2024.

The 2017 Clean Air Plan addresses four categories of pollutants: ground-level ozone and its key precursors, ROG and NO_X; PM, primarily $PM_{2.5}$, and precursors to secondary $PM_{2.5}$; air toxics; and greenhouse gas (GHG) emissions. The control measures are categorized based on the economic sector framework, including stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, and water measures.

The air district is the regional agency with jurisdiction over the nine-county region in the air basin. The Association of Bay Area Governments, the Metropolitan Transportation Commission, county transportation agencies, cities and counties, and various nongovernmental organizations also participate in the efforts to improve air quality through a variety of programs. These programs include the adoption of regulations and policies, as well as implementation of extensive education and public outreach programs. The air district is responsible for attaining and/or maintaining air quality in the region within federal and state air quality standards. Specifically, the air district has the responsibility to monitor ambient air pollutant levels throughout the region, and to develop and implement strategies to attain the applicable federal and state standards. The air district has permit authority over most types of stationary emission sources and can require stationary sources to obtain permits; and can impose emission limits, set fuel or material specifications, or establish operational limits to reduce air emissions. The air district also regulates new or expanding stationary sources of TACs and requires air toxic control measures for many sources emitting TACs.

Air District Rules

The air district rules that would be most applicable to the proposed project pertain to permits for emergency generators. The air district regulates stationary-source air pollutant emissions through Rule 2-1 (General Permit Requirements), Rule 2-2 (New Source Review), and Rule 2-5 (New Source Review of Toxic Air Contaminants). Under these rules, all stationary sources that have the potential to emit air pollutant emissions, including criteria air pollutants and TACs, above levels specified by regulation are required to obtain permits from the air district. These rules provide guidance for the review of new and modified stationary sources of emissions, including evaluation of health risks and potential measures to reduce health risks.

Stationary sources must apply best available control technology to reduce emissions, and the air district recently updated its best available control technology requirement for emergency generators greater than 1,000 hp, requiring these sources to achieve U.S. EPA Tier 4 emissions standards.[43]

San Francisco Dust Control Ordinance

Health code article 22B and San Francisco Building Code section 106.A.3.2.6 collectively constitute the Construction Dust Control Ordinance (adopted in July 2008). The ordinance requires that all site preparation work, demolition, or other construction activities in San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a building permit from the department of building inspection. For projects over 0.5 acre and within 1,000 feet of sensitive receptor(s) (e.g., residences and group living quarters, schools, daycare centers, and hospitals and other health-care facilities), and other projects as deemed necessary by the Director of the San

[43] Bay Area Air Quality Management District, Best Available Control Technology for Emergency Backup Engines greater than or equal to 1,000 brake-horsepower, 2021, https://www.baaqmd.gov/permits/apply-for-a-permit/engine-permits, accessed January 17, 2024.

Francisco Department of Public Health (health department), the Construction Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan, with a goal of minimizing visible dust, for approval by the health department prior to issuance of a building permit. Such larger projects must also identify a compliance monitor, and that person must be available at all times during construction activities.

Construction permits for projects involving disturbance of more than 0.5 acre within 1,000 feet of sensitive receptor(s), such as the proposed project, would not be issued without written notification from the health department director, stating that sponsors of the development have a site-specific dust control plan, unless the director waives the requirement. The Construction Dust Control Ordinance requires project sponsors responsible for construction activities to control construction dust on a site, or implement practices that result in equivalent dust control that are acceptable to the health department director. Dust suppression activities may include watering all active construction areas enough to prevent dust from becoming airborne. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by article 21, section 1100, et seq., of the San Francisco Public Works Code.

Regulation of Odors

The air district's Regulation 7 places general limitations on odorous substances and specific emission limitations on certain odorous compounds. The regulation limits the "discharge of any odorous substance which causes the ambient air at or beyond the property line…to be odorous and to remain odorous after dilution with four parts of odor-free air." The air district must receive odor complaints from 10 or more complainants within a 90-day period for the limitations of this regulation to go into effect. If this criterion has been met, an odor violation can be issued by the air district if a test panel of people can detect an odor in samples collected periodically from the source.

3.C.3 Impact Assessment Methodology

This section lists the thresholds that were used to conclude whether an impact would be significant; and describes the methods used to determine the impacts that could occur with implementation of the proposed project.

Significance Criteria

Implementation of the proposed project would have a significant impact related to air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard;
- Expose sensitive receptors to substantial pollutant concentrations; or
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

As discussed in Section E.8 of the initial study (Appendix B), the proposed project would not interfere with or obstruct implementation of the clean air plan, the proposed project's operational activities would not result in a cumulatively considerable net increase in any non-attainment criteria air

pollutant, and the proposed project would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people. As identified in the initial study, these impacts were determined to be less than significant. Therefore, these criteria are not further addressed below, and this analysis is focused on the following:

- The potential for the proposed project's construction activities to result in a cumulatively considerable net increase in non-attainment criteria air pollutants;
- The potential for the proposed project to expose sensitive receptors to substantial pollutant concentrations; and
- The potential for the proposed project to result in a considerable contribution to cumulative impacts related to exposing sensitive receptors to substantial pollutant concentrations.

Approach to Analysis

Proposed Project Features

This section provides an overview of the approach to analysis; additional detail is provided in Appendix D, Health Risk Assessment, of this EIR. The proposed project has the potential to generate emissions during the construction and operational phases. The initial study found that operational criteria air pollutant impacts would be less than significant; therefore, this analysis focuses on project construction-related criteria air pollutant impacts and the potential for the proposed project to expose sensitive receptors to substantial pollutant concentrations.

Project construction would take approximately 29 months and is currently anticipated to occur between January 2027 and June 2029. The construction phases would include demolition, site preparation, grading, building construction, architectural coating and finishing, and paving activities. The proposed new buildings would be constructed on mat foundations, and no impact or vibratory pile driving techniques would be used. The proposed project would require the excavation of 9,060 cubic yards of soil to a maximum depth of 15 feet. The total area of soil disturbance would be 29,750 square feet. The proposed project would also require the demolition of 14,000 square feet of existing buildings. Construction is scheduled to occur Monday through Friday, from 7:00 a.m. to 8:00 p.m. Nighttime construction is not expected.

Methodology and Thresholds of Significance

The methodology for quantifying air quality impacts and the thresholds of significance used as the basis for determining criteria air pollutant and health risk impacts under CEQA are discussed in the following subsections.

Regional Criteria Air Pollutants

During construction, air quality impacts could result from exhaust emissions generated by off-road construction equipment and on-road vehicles used by construction workers, vendor deliveries, and material hauling. Fugitive dust emissions would result from demolition and earthmoving activities; fugitive ROG emissions would be generated from paving and the application of architectural coatings.

A list of construction equipment expected to be used and level of activity (i.e., number of days and hours per day of use)—as well as the anticipated number of construction worker, vendor, and haul trips by phase for the proposed project—is included in Appendix D in the section describing the assumptions and methodology for the analysis. Air pollutant emissions generated by construction activities (demolition, site preparation, grading, building construction, architectural coating and

finishing, and paving) were estimated using the California Emissions Estimator Model version 2022.1 (CalEEMod). CalEEMod is the latest air quality emissions model developed by the California Air Pollution Control Officers Association (CAPCOA) and recommended by the air district. CalEEMod incorporates air board approved Off-Road and On-Road Mobile-Source Emission Factor models (OFFROAD and EMFAC, respectively) and is designed to estimate emissions from land use development projects. CalEEMod allows for the input of project-specific information and includes default assumptions for when project-specific information is not available. Emissions modeling input data and assumptions for the project schedule, off-road construction equipment, grading and demolition activities, construction worker and truck trips, and asphalt paving are based on information provided by the project sponsor. Where project-specific data is not available, default assumptions from CalEEMod were used to estimate project emissions. Model inputs are detailed in Appendix D. The result of this analysis is compared against the significance thresholds discussed below.

As shown in Table 3.C-2, the air basin is designated as being in nonattainment for ozone, $PM_{2.5}$, and PM_{10}. By definition, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in nonattainment of air quality standards. Instead, a project's individual emissions are considered to contribute to the existing, cumulative air quality conditions. If a project's contribution to cumulative air quality conditions is considerable, then the project's impact on air quality would be considered significant.

Table 3.C-5, Criteria Air Pollutant Significance Thresholds identifies quantitative criteria air pollutant significance thresholds. The table is followed by a discussion of each threshold. Projects that would result in criteria pollutant emissions above these significance thresholds would result in a cumulatively considerable net increase in nonattainment criteria air pollutants in the air basin (ozone precursors and PM). Those projects that would result in emissions that do not exceed these thresholds would not result in a cumulatively considerable net increase in nonattainment criteria air pollutants (ozone precursors or PM), the second bulleted significance criteria identified above. Impact AQ-2 analyzes construction criteria air pollutant impacts resulting from the proposed project.

Table 3.C-5 Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds Average Daily Emissions (lbs./day)
ROG	54
NO_X	54
PM_{10}	82 (exhaust emissions only)
$PM_{2.5}$	54 (exhaust emissions only)
Fugitive Dust	Best Management Practices

Source: Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, Chapter 3: Thresholds of Significance, April 20, 2023, Table 3-1, accessed January 18, 2024.
lbs./day = pounds per day
NO_X = oxides of nitrogen
PM_{10} = particulate matter equal to or less than 10 micrometers in diameter
$PM_{2.5}$ = particulate matter equal to or less than 2.5 micrometers in diameter
ROG = reactive organic gas

The air district's CEQA Air Quality Guidelines Appendix A, Thresholds of Significance Justification, provides evidence to support the criteria air pollutant significance thresholds listed in Table 3.C-5; these thresholds for the ozone precursors ROG and NO_X are tied to the air district's offset requirements for ozone precursors. This is based on the fact that the bay area is not in attainment with the federal ozone standard. Therefore, such an approach is appropriate "to prevent further deterioration of ambient air quality and thus has nexus and proportionality to prevention of a regionally cumulative significant impact (e.g., worsened status of nonattainment)."[44] As discussed above, the ambient air quality standards have been established by developing specific public-health-based and welfare-based criteria as the basis for setting permissible levels. Therefore, attainment can be considered protective of public health, thereby providing a strong link between a mass emission threshold and avoidance of health effects. For PM_{10} and $PM_{2.5}$, the air district established significance thresholds based on the federal New Source Review program for new stationary sources of pollution. As stated in the air district's CEQA Air Quality Guidelines Appendix A, "These thresholds represent the emission levels above which a project's individual emissions would result in a considerable adverse contribution to the [air basin]'s existing air quality conditions."[45] As with ROG and NO_X, these thresholds provide a connection between a mass emission threshold and avoidance of health effects.

Fugitive dust emissions from land use development projects are primarily associated with construction activities. Studies have shown that the application of best management practices at construction sites can significantly control fugitive dust,[46] and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.[47] San Francisco's Construction Dust Control Ordinance requires a number of fugitive dust control measures to ensure that construction projects do not result in visible dust. The project would be subject to the requirements of the Construction Dust Control Ordinance, which is the basis for determining the significance of criteria air pollutant and ozone precursor impacts from fugitive dust emissions associated with construction activities.

Community Health Risk and Hazards

As stated in Section E.8, Air Quality of the initial study, the proposed project would generate a negligible amount of TACs during operation from the approximately 302 net new daily vehicle trips and any additional truck trips to the site. The proposed project also includes a new Tier 4 backup emergency generator, to replace the existing on-site generator which is approximately 25 years old.[48] The new generator would be of approximately the same size and in the same location, however, completely enclosed within the proposed Bay Building. Thus, the replacement generator would not increase TACs above existing conditions. As such, the health risks and hazards analysis is focused on construction period TAC emissions.

Based on the CalEEMod emission results, a construction HRA was prepared to provide quantitative estimates of construction-period health risks to on-site and off-site receptors resulting from emissions

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44 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines, Appendix A: Thresholds of Significance Justification*, April 20, 2023, p. A-46, *https://www.baaqmd.gov/~/media/files/planning- and- research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance- justification_final-pdf.pdf?la=en*, accessed January 18, 2024.

45 Ibid.

46 Western Regional Air Partnership, *WRAP Fugitive Dust Handbook*, September 7, 2006,.

47 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines, Appendix A: Thresholds of Significance Justification*, April 20, 2023, p. A-45, *https://www.baaqmd.gov/~/media/files/planning- and- research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance- justification_final-pdf.pdf?la=en*, accessed January 18, 2024.

48 Charles Pankow Builders, LTD, *Generator Description*, October 18, 2023.

from the proposed project due to diesel PM and $PM_{2.5}$. The construction HRA analyzes $PM_{2.5}$ concentrations, cancer risk, and non-cancer chronic hazard index (chronic HI). The air district and CAPCOA have prepared detailed guidance for the air modeling required in HRAs. In 2020, San Francisco prepared a Citywide Health Risk Assessment (2020 Citywide HRA) and technical support document modeling existing health risk throughout the City. The construction HRA was conducted using the air dispersion modeling performed using the U.S. EPA's dispersion model AERMOD. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data.

Consistent with air district recommendations for HRAs, the U.S. EPA's regulatory dispersion model (AERMOD)[49] was used to estimate pollutant concentrations at receptors consistent with the 2020 Citywide HRA geodatabase within the proposed project's HRA modeling domain. The pollutant concentrations files from AERMOD were then supplied as inputs to the air board's Hot Spots Analysis and Reporting Program (HARP2),[50] along with corresponding project-related TAC emissions (emissions estimating methodology summarized above), to estimate the health risk impacts associated with the construction phase of the proposed project. TAC exposure factors and guidance from the 2015 OEHHA Air Toxics Hot Spots Program[51] are accounted for in the HARP2 software.

For construction, the HRA modeling assumed a 2.4-year construction duration, consistent with the 29-month anticipated construction duration. Construction activity was modeled to occur five days per week. Both off-road and on-road sources of TACs associated with the proposed project's construction phases were included in the HRA. For construction, off-road sources of emissions were modeled as adjacent volume and area sources spanning the footprint of the proposed project site. On-road emissions were modeled as adjacent volume sources along construction vehicle routes.

After conducting dispersion modeling, concentrations of $PM_{2.5}$ are presented where the project would have the greatest impact on receptors. In addition, TAC concentrations were evaluated to determine the potential cancer risk from the project. The impact of $PM_{2.5}$ concentration and potential cancer risk from the project was evaluated based on the increased level of emissions and proximity to receptors relative to the project. The construction HRA evaluated long-term cancer risk and annual $PM_{2.5}$ concentrations to on-site residents, off-site residents, off-site childcare receptors, off-site school receptors, and on-site and off-site workers. Impacts were evaluated for receptors within 1,000 feet of the project site. Detailed methodology pertaining to the HRA and dispersion modeling is available in Appendix D.

Table 3.C-6, Excess Cancer Risk and $PM_{2.5}$ Concentration Thresholds presents the cancer risk and $PM_{2.5}$ health risk thresholds that are applied to the proposed project. The thresholds of significance used to evaluate health risks from new sources of TACs associated with construction of the proposed project are based on the potential for the proposed project to substantially affect the geography or severity of the APEZ at sensitive receptor and worker locations. As shown in Table 3.C-6, if the proposed project would result in sensitive receptor locations meeting the APEZ criteria that otherwise

[49] AERMOD Dispersion Model. *https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod*.

[50] HARP Air Dispersion Modeling and Risk Tool. *https://ww2.arb.ca.gov/resources/documents/harp-air-dispersion-modeling-and-risk-tool.*

[51] Office of Environmental Health Hazard Assessment (OEHHA), February 2015, *Air Toxics Hot Spots Program Guidance Manual.*

would not without the proposed project, a substantial health risk contribution threshold is defined as an annual average $PM_{2.5}$ concentration at or above 0.3 µg/m^3 or an excess cancer risk at or greater than 10.0 per 1 million. The 0.3 µg/m^3 annual average $PM_{2.5}$ concentration and the excess cancer risk of 10.0 per 1 million persons exposed are the project-level health risk significance levels identified by the air district; they are the levels below which the air district considers new sources not to make a considerable contribution to cumulative health risks.[52] For those locations meeting the APEZ criteria, a lower significance threshold is required to ensure that the proposed project's contribution to existing health risks would not be significant. In these areas, project-generated $PM_{2.5}$ concentrations at or above 0.2 µg/m^3, or an excess cancer risk at or greater than 7.0 per 1 million, would be considered to be a substantial health risk contribution, and a significant impact would occur.[53] As discussed previously in Section 3.C.2, the project site and vicinity are located within the APEZ; therefore, the lower significance thresholds are applied in this analysis.

Table 3.C-6 Excess Cancer Risk and $PM_{2.5}$ Concentration Thresholds

Affected Sensitive Receptors	$PM_{2.5}$ (µg/m^3)	Excess Cancer Risk (cases per 1 million population)
APEZ Criteria		
APEZ criteria[1]	10.0	100.0
Thresholds for Construction		
Significance threshold for project contribution to sensitive receptors meeting the APEZ criteria[2]	0.2	7.0
Significance threshold for project contribution to sensitive receptors that do not meet the APEZ criteria, but would meet the APEZ criteria as a result of the project[3]	0.3	10.0

Sources: San Francisco Department of Public Health, Environmental Health, Planning, Memorandum to File regarding 2014 Air Pollutant Exposure Zone Map, April 9, 2014.
Jerrett, M., et al., "Spatial Analysis of Air Pollution and Mortality in Los Angeles," Epidemiology 16:727–736, 2005.

1 San Francisco Department of Public Health, Environmental Health, Planning, Memorandum to File regarding 2014 Air Pollutant Exposure Zone Map (April 9, 2014).

2 A 0.2 µg/m^3 increase in $PM_{2.5}$ would result in a 0.28 percent increase in noninjury mortality, or an increase of about 21 excess deaths per million population per year from noninjury causes in San Francisco. This information is based on M. Jerrett et al. 2005. The excess cancer risk has been proportionally reduced to result in a significance criterion of seven per 1 million persons exposed

3 Bay Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines, Chapter 3: Thresholds of Significance*, April 20, 2023, *https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines*, accessed January 18, 2024.

APEZ = Air Pollutant Exposure Zone
µg/m^3 = micrograms per cubic meter
$PM_{2.5}$ = particulate matter less than or equal to 2.5 micrometers in diameter

52 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines, Chapter 5: Project-Level Air Quality Impacts*. April 20, 2023, p. 5-14, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?la=en, accessed January 18, 2024.

53 A 0.2 µg/m^3 increase in $PM_{2.5}$ would result in a 0.28 percent increase in noninjury mortality, or an increase of about 21 excess deaths per 1,000,000 population per year from noninjury causes in San Francisco. This information is based on Jerrett M. et al., Spatial Analysis of Air Pollution and Mortality in Los Angeles, Epidemiology 16 (2005): 727–736. The excess cancer risk has been proportionally reduced to result in a significance criterion of 7 per 1 million persons exposed.

Projects that result in a cancer risk or annual average $PM_{2.5}$ concentration below these levels at sensitive or worker receptors would not result in exposure to substantial pollutant concentrations. The chronic HI resulting from the proposed project is also disclosed and compared with the air district's chronic HI threshold of 1.0.

The health risk impact of the proposed project at the maximally exposed sensitive receptors is presented in Impact AQ-4. Impact AQ-4 also provides health risk information from existing (background) sources of air pollution based on the 2020 Citywide HRA.

Cumulative Impact Assessment

Regional air quality impacts are cumulative impacts. Emissions from past, present, and future projects contribute to adverse regional air quality impacts on a cumulative basis. No single development project is large enough to result in regional nonattainment of ambient air quality standards. The project-level thresholds for mass emissions of criteria air pollutants are based on levels at which new sources are not anticipated to result in a considerable net increase in nonattainment criteria air pollutants. Therefore, if the project's mass emissions do not exceed the project-level thresholds, the project would not result in a considerable contribution to cumulatively significant regional air quality impacts. For this reason, no separate cumulative criteria air pollutant analysis is warranted, and none is provided below.

Because the project site and vicinity are in the APEZ, existing health risks resulting from ambient air quality conditions have been shown through modeling to be greater than other areas of the City due to pollution from roadways and other emissions sources. Therefore, community health risks at the project site and vicinity are already significant. As a result, the thresholds for evaluating the proposed project's contribution to localized health risk impacts are lower than those established by the air district. As discussed above, a project- generated $PM_{2.5}$ concentration at or above 0.2 $\mu g/m^3$, or an excess cancer risk at or greater than 7.0 per 1 million from a project at sensitive receptors in the APEZ, would be a substantial health risk contribution to the existing significant cumulative health risk impact in this area.

The project-level analysis identified the maximally exposed individual for on-site and off-site receptors. Nearby projects were identified within 1,000 feet of the maximally exposed offsite residential and worker sensitive receptors, and a qualitative cumulative health risk analysis is included to disclose the extent to which these projects also contribute to a cumulative impact with the proposed project.[54] Cumulative development in the project vicinity includes only the Marina Improvement and Remediation Project, which would be 830 feet from the project site.

Health risks from existing sources are also accounted for as part of the cumulative impact analysis. As described above, the City developed a baseline year of 2020 as part of the 2020 Citywide HRA. Health risks (cancer risk and annual $PM_{2.5}$ concentrations) from the 2020 baseline year were added to those modeled for the proposed project at the offsite maximally exposed receptors.

[54] Bay Area Air Quality Management District, California Environmental Quality Act Air Quality Guidelines, Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards. April 25, 2023, p. E-102, *https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines*, accessed January 17, 2024.

3.C.4 Project Impacts and Mitigation Measures

This section describes the analysis of impacts related to air quality associated with construction of the proposed project. Measures to mitigate significant impacts accompany the discussion of each identified significant impact. Please note that the impact numbers reflect the numbering used in the initial study, and as such Impacts AQ-2 and AQ-4 are included below. Impacts AQ-1, AQ-3, and AQ-5 were found in the initial study to be less than significant and are not further discussed in this section.

Impact AQ-2: The proposed project's construction activities would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin. (*Less Than Significant*)

During the proposed project's construction period, construction activities would result in emissions of ozone precursors and particulate matter in the form of fugitive dust and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve paint, other types of architectural coatings, or asphalt paving. These emissions are discussed below.

Fugitive Dust

Demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. The Construction Dust Control Ordinance requires that all site preparation work, demolition, or other construction activities in San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from the department of building inspection. In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following dust suppression activities: water all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. During excavation and soil-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10-mil (0.01-inch) polyethylene plastic (or equivalent) tarp and braced down, or protected with other equivalent soil stabilization techniques. For projects over one-half acre, such as the proposed project, the dust control ordinance requires that the project sponsor submit a dust control plan for approval by the San Francisco Department of Public Health.[55] The site-specific dust control plan would require the implementation of additional dust control measures such as installation of dust curtains and windbreaks, independent third-party inspections and monitoring, provision of a public complaint hotline, and suspension of construction during high wind conditions.

San Francisco ordinance 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the

[55] The department of building inspection will not issue a building permit without written notification from the director of public health that the applicant has a site-specific dust control plan unless the director waives the requirement.

boundaries of San Francisco unless permission is obtained from SFPUC. Nonpotable water must be used for soil compaction and dust control activities during project construction and demolition.

Compliance with the regulations and procedures set forth by the Construction Dust Control Ordinance would reduce potential dust-related air quality impacts, including dust-related particulate matter (a criteria air pollutant) that may be a constituent of that particulate matter, and this impact would be **less than significant**.

Criteria Air Pollutants

As discussed above on page 3.C-23, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment, architectural coatings, and paving activities. **Table 3.C-7, Proposed Project Total and Average Daily Construction Emissions** shows the estimated emissions from project construction in comparison to the thresholds of significance. As shown in Table 3.C-7, the proposed project's construction activities would not exceed any of the air district's criteria air pollutant significance thresholds. Therefore, the proposed project's construction criteria air pollutant impact would be *less than significant*.

Table 3.C-7 Proposed Project Total and Average Daily Construction Emissions

Project Construction	ROG	NO_X	PM_{10} (Exhaust Only)	$PM_{2.5}$ (Exhaust Only)
Total Construction Emissions (tons)	1.2	2.0	0.1	0.1
Average daily emissions[1] (pounds per day)	3.5	10.4	0.4	0.3
Threshold of significance (pounds per day)	54	54	82	54
Exceeds threshold?	No	No	No	No

[1] The air district's CEQA air quality guidelines states that average daily construction emissions should be calculated for each year of construction. The average daily emissions shown in Table 3.C-7 present the highest average daily construction emissions.

NO_X = oxides of nitrogen
PM_{10} = particulate matter less than or equal to 10 micrometers in diameter
$PM_{2.5}$ = particulate matter less than or equal to 2.5 micrometers in diameter
ROG = reactive organic gas

Impact AQ-4: The proposed project would expose sensitive receptors to substantial pollutant concentrations. (*Less Than Significant with Mitigation*)

As previously discussed, construction activities for the proposed project would generate emissions of TACs and $PM_{2.5}$ associated with off-road equipment, on-road vehicles, demolition of existing onsite structures, earthmoving activities, architectural coating activities, and off-gas from paving. Construction emissions would be temporary in nature, ceasing once construction was complete. Upon completion of the proposed project, operational emissions of TACs and $PM_{2.5}$ from the proposed project's mobile and stationary sources would exist. As discussed above, the proposed project would generate a negligible amount of TACs during operation from the approximately 302 net new daily vehicle trips and any additional truck trips to the site. The proposed project also includes a new Tier 4 backup emergency generator, to replace the existing on-site generator which is approximately 25

years old.[56] The new generator would be of approximately the same size and in the same location, however within the proposed Bay Street building. Thus, the replacement generator would decrease rather than increase TACs compared to the existing generator. As such, the health risks and hazards analysis is focused on construction period TAC emissions.

Health Risk Results

The modeled excess cancer risk and annual $PM_{2.5}$ concentrations at the maximally exposed on-site residents, off-site residents, off-site childcare receptors, off-site school receptors, and on-site and off-site workers are shown in **Table 3.C-8, Existing Plus Project Lifetime Cancer Risk at Maximally Exposed Individual Receptors** and **Table 3.C-9, Existing Plus Project Annual Average $PM_{2.5}$ Concentration at Maximally Exposed Individual Receptors**, respectively. The maximally exposed individual receptor is the sensitive receptor location with the maximum cancer risk and $PM_{2.5}$ concentration from the proposed project. Appendix D illustrates the location of the maximally exposed individual receptors for cancer risk and $PM_{2.5}$ concentrations due to construction of the proposed project.

Table 3.C-8 Existing Plus Project Lifetime Cancer Risk at Maximally Exposed Individual Receptors

	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed project cancer risk (per 1 million)	1.37	26.31	8.44	0.14	0.69	0.05
Existing lifetime excess cancer risk (2020)1 (per 1 million)	108.16	107.64	133.99	95.39	108.16	133.99
Existing + proposed project cancer risk (per 1 million)	109.53	133.95	142.43	95.53	108.85	134.04
Existing cancer risk meets APEZ criteria?	Yes	Yes	Yes	No	Yes	Yes
Significance threshold for project contribution (per 1 million)	7.0	7.0	7.0	10.02	7.0	7.0
Threshold exceeded?	No	Yes	Yes	No	No	No

Source: LSA 2024; see Appendix D.2, 3400 Laguna Street Air Quality and Health Risk Assessment Results.

[1] Background cancer risk at receptor from the 2020 Citywide HRA database.

[2] The excess cancer risk of 10 significance threshold only applies to receptors that do not meet the excess cancer risk APEZ criteria under existing conditions but would meet the excess cancer risk APEZ criteria as a result of the proposed project.

UTM = Universal Transverse Mercator

UTM X = eastward-measured distance

UTM Y = northward-measured distance

[56] Charles Pankow Builders, LTD, *Generator Description*, October 18, 2023.

Table 3.C-9 Existing Plus Project Annual Average PM2.5 Concentration at Maximally Exposed Individual Receptors

	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	55012, 4184080	550240, 4184160
Proposed project annual average $PM_{2.5}$ concentration (µg/m³)	0.13	0.01	0.02	0.01	0.12	<0.01
Existing annual average $PM_{2.5}$ concentration (2020)[1] (µg/m³)	8.73	8.73	9.28	8.56	8.73	9.28
Existing + proposed project annual average $PM_{2.5}$ concentration (µg/m³)	8.86	8.74	9.30	8.57	8.85	9.28
Existing $PM_{2.5}$ concentration meets APEZ?	No	No	No	No	No	No
Significance threshold for project contribution (µg/m₃)[2]	0.3	0.3	0.3	0.3	0.3	0.3
Threshold exceeded?	No	No	No	No	No	No

Source: LSA 2024; see Appendix D.2, 3400 Laguna Street Air Quality and Health Risk Assessment Results.
[1] Background $PM_{2.5}$ concentration at receptor from the 2020 Citywide HRA database.
[2] The $PM_{2.5}$ concentration significance threshold only applies to receptors that do not meet the $PM_{2.5}$ APEZ criteria under existing conditions but would meet the $PM_{2.5}$ APEZ criteria as a result of the proposed project.
µg/m³ = micrograms per cubic meter
$PM_{2.5}$ = particulate matter less than 2.5 micrograms in diameter
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

As shown in Table 3.C-8 and Table 3.C-9, the maximum cancer risk from construction of the proposed project would be approximately 26.31 in one million at the maximally exposed individual off-site residential receptor, which would exceed the cancer risk threshold of 7 in one million. The results of the analysis indicate that the maximum $PM_{2.5}$ concentration at the maximally exposed individual would be 0.13 µg/m³ at an on-site residential receptor, which would not exceed the significance threshold of 0.30 µg/m³. In addition, the maximum noncancer chronic HI would be 0.06 at the maximally exposed individual. Noncancer chronic HI increases due to the project would be well below the significance threshold of 1.0. However, since the maximum cancer risk from the proposed project would exceed the cancer risk threshold, the proposed project would result in emissions of TACs that

would expose sensitive receptors to substantial pollutant concentrations. This impact would be **significant**.

Mitigation Measures

Mitigation Measure M-AQ-4, which would require the use of cleaner construction equipment, was identified to reduce the significant cancer risk from construction of the proposed project.

Mitigation Measure M-AQ-4: **Off-Road Construction Equipment Requirements.** The project sponsor shall comply with the following:

A. Engine Requirements

1. All off-road diesel-powered construction equipment of 25 horsepower or more used for project construction shall have engines that meet or exceed the California Air Resources Board Tier 4 Final emissions standards.

2. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions and safe operating conditions). The contractor shall post legible and visible signs in English, Spanish, Tagalog, and Chinese in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.

3. The project sponsor shall instruct construction workers and equipment operators in the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

B. Construction Emissions Minimization Plan. Before starting onsite construction activities, the contractor shall submit a construction emissions minimization plan (plan) to the ERO or the ERO's designee for review and approval. The plan shall state, in reasonable detail, how the contractor will meet the engine requirements of section A.

1. The plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include but is not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (tier rating), horsepower, engine serial number, and expected fuel use and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.

2. The project sponsor shall ensure that all applicable requirements of the plan have been incorporated into the contract specifications. The plan shall include a certification statement that the project sponsor agrees to comply fully with the plan.

3. The project sponsor shall make the plan available to the public for review on site during working hours. The project sponsor shall post at the construction site a legible and visible sign summarizing the plan. The sign shall also state that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. The project sponsor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

C. **Monitoring.** After the start of construction activities, the contractor shall submit reports every six months to the ERO or the ERO's designee, documenting compliance with the plan. After completion of construction activities and prior to receiving a certificate of occupancy, the project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the plan.

Significance after Mitigation

Implementation of Mitigation Measure M-AQ-4 would reduce construction cancer risk and $PM_{2.5}$ concentrations from the proposed project. **Table 3.C-10, Existing Plus Project Lifetime Cancer Risk at Maximally Exposed Individual Receptors with Mitigation Measure M-AQ-4** and **Table 3.C-11, Existing Plus Project Annual $PM_{2.5}$ Concentration at Maximally Exposed Individual Receptors with Mitigation Measure M-AQ-4** quantitatively summarize the mitigated project's construction cancer risk and $PM_{2.5}$ concentrations, with incorporation of Mitigation Measure M-AQ-4.

Table 3.C-10 Existing Plus Project Lifetime Cancer Risk at Maximally Exposed Individual Receptors with Mitigation Measure M-AQ-4

	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed project cancer risk (per 1 million)	0.29	5.49	1.76	0.03	0.14	0.01
Existing lifetime excess cancer risk (2020)1 (per 1 million)	108.16	107.64	133.99	95.39	108.16	133.99

Table 3.C-10 Existing Plus Project Lifetime Cancer Risk at Maximally Exposed Individual Receptors with Mitigation Measure M-AQ-4

	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Existing + proposed project cancer risk (per 1 million)	108.45	113.13	135.75	95.42	108.30	134.0
Existing cancer risk meets APEZ criteria?	Yes	Yes	Yes	No	Yes	Yes
Significance threshold for project contribution (per 1 million)	7.0	7.0	7.0	10.02	7.0	7.0
Threshold exceeded?	No	No	No	No	No	No

Source: LSA 2024; see Appendix D.2, 3400 Laguna Street Air Quality and Health Risk Assessment Results.
[1] Background cancer risk at receptor from the 2020 Citywide HRA database.
[2] The excess cancer risk of 10 significance threshold only applies to receptors that do not meet the excess cancer risk APEZ criteria under existing conditions but would meet the excess cancer risk APEZ criteria as a result of the proposed project.
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

Table 3.C-11 Existing Plus Project Annual $PM_{2.5}$ Concentration at Maximally Exposed Individual Receptors with Mitigation Measure M-AQ-4

	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120 4184080	550240, 4184160
Proposed project annual average $PM_{2.5}$ concentration ($\mu g/m_3$)	0.02	0.02	0.01	<0.01	0.03	<0.01
Existing annual average $PM_{2.5}$ concentration (2020)[1] ($\mu g/m_3$)	8.73	8.73	9.28	8.56	8.73	9.28
Existing + proposed project annual average $PM_{2.5}$ concentration ($\mu g/m_3$)	8.75	8.75	9.29	8.56	8.76	9.28
Existing $PM_{2.5}$ concentration meets APEZ?	No	No	No	No	No	No

Table 3.C-11 Existing Plus Project Annual $PM_{2.5}$ Concentration at Maximally Exposed Individual Receptors with Mitigation Measure M-AQ-4

	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Significance threshold for project contribution ($\mu g/m_3$)[2]	0.3	0.3	0.3	0.3	0.3	0.3
Threshold exceeded?	No	No	No	No	No	No

Source: LSA 2024; see Appendix D.2, 3400 Laguna Street Air Quality and Health Risk Assessment Results.
[1] Background $PM_{2.5}$ concentration at receptor from the 2020 Citywide HRA database.
[2] The $PM_{2.5}$ concentration significance threshold only applies to receptors that do not meet the $PM_{2.5}$ APEZ criteria under existing conditions but would meet the $PM_{2.5}$ APEZ criteria as a result of the proposed project.
$\mu g/m_3$ = micrograms per cubic meter
$PM_{2.5}$ = particulate matter less than 2.5 micrograms in diameter
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

As shown in Table 3.C-10, the maximum cancer risk from the proposed project would be approximately 5.49 in one million at the maximally exposed individual off-site residential receptor, which would not exceed the cancer risk threshold of 7 in one million. The results of the analysis indicate that the maximum $PM_{2.5}$ concentration at the maximally exposed individual would be 0.03 $\mu g/m^3$ at an on-site worker receptor, which would not exceed the significance threshold of 0.30 $\mu g/m^3$. Therefore, with implementation of Mitigation Measure M-AQ-4, the proposed project would not result in emissions of TACs that would expose sensitive receptors to substantial pollutant concentrations. This impact would be **less than significant with mitigation**.

3.C.5 Cumulative Impacts

Regional air quality effects are inherently cumulative effects—the nonattainment status of regional pollutants results from past and present development in the air basin. No single project would be sufficient in size to result in nonattainment of regional air quality standards. The potential for the proposed project to result in significant criteria air pollutant emissions, and therefore a cumulatively considerable contribution to nonattainment criteria pollutants, is addressed under Impact AQ-2. Therefore, no separate cumulative criteria air pollutant analysis is required. The discussion of cumulative impacts below addresses cumulative impacts related to exposure to local sources of $PM_{2.5}$ and TAC emissions.

Impact C-AQ-4: Construction of the proposed project, in combination with cumulative projects, would expose sensitive receptors to substantial pollutant concentrations. ***(Less than Significant with Mitigation)***

The maximally exposed individual receptors are in an area currently designated as an APEZ; therefore, a significant health risk impact already exists as a result of past projects. As discussed under Impact AQ-4, the construction HRA conducted to determine whether the proposed project would

substantially contribute to the existing health risks at the maximally exposed individual receptors concluded that the impact would be significant. However, with implementation of Mitigation Measure M-AQ-4, health risk impacts would be reduced to less than significant.

Cumulative development in the project vicinity only includes the Marina Improvement and Remediation Project, which is located a minimum of 830 feet from the project site. While it is not expected that the two projects would be constructed at the same time, cancer risk is the probability of getting cancer over a 30-year (or 25-year for workers) exposure period, and cumulative project emissions don't need to occur at the same time to combine to result in a cumulative cancer risk impact. Cumulative development could result in cumulative TAC emissions, including cancer risk, as construction activities would be expected to require diesel-powered construction equipment contributing to DPM and $PM_{2.5.}$. As a result, the Marina Improvement and Remediation Project would increase health risks at the project's maximally exposed individual receptors. As shown in Table 3.C-10 and Table 3.C-11, with implementation of Mitigation Measure M-AQ-4, the proposed project's health risk contribution at the maximally exposed individual receptors would not exceed the City's thresholds; therefore, the contribution of the proposed project would not be cumulatively considerable. Although there is an existing cumulatively significant impact due to past, present, and probable future air pollutants at receptor locations, with implementation of Mitigation Measure M-AQ-4, the proposed project would not substantially contribute to this cumulatively significant impact. Furthermore, due to the distance from the project site, cumulative health risks from the Marina Improvement and Remediation Project would be further diminished. This cumulative impact would be **less than significant with mitigation**.

CHAPTER 4 OTHER CEQA CONSIDERATIONS

This chapter discusses the following topics in relation to the proposed project: growth-inducing impacts, significant unavoidable impacts, significant irreversible impacts, and areas of known controversy and issues to be resolved.

4.A Growth Inducement

CEQA Guidelines section 15126.2[e] requires an examination of the direct and indirect impacts of the proposed project, including the potential of the project to induce growth leading to changes in land use patterns and population densities and related impacts on environmental resources. Specifically, the CEQA Guidelines state that an EIR shall discuss:

> [T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth … It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project has the potential to induce growth both directly and indirectly. Direct growth inducement would result if a project involved construction of new housing or construction of commercial development that attracted new visitors. Indirect growth inducement would result, for instance, if implementing a project resulted in any of the following:

- Substantial new housing or permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises);
- A construction effort with substantial short-term employment opportunities that indirectly stimulates the need for additional housing and services to support the new temporary employment demand; or
- Removal of an obstacle to additional growth and development, such as removing a constraint on a required public utility or service (e.g., construction of a major sewer line with excess capacity through an undeveloped area) or adding development adjacent to undeveloped land.

Growth inducement itself is not an environmental effect, but it may lead to foreseeable environmental effects. Generally, a project that increases population is not viewed as having a significant impact on the environment unless the physical changes that would be needed to accommodate the project-related population growth would have adverse impacts on the environment. These environmental effects may include increased demand on other community and public services and infrastructure, increased traffic and noise, degradation of air or water quality, or loss of plant or animal habitats.

The proposed project would not involve the construction of residential units that would directly and substantially increase the population in San Francisco. As discussed in Section E.3, Population and Housing, in Appendix B of this draft EIR, construction of the proposed project would increase the number of residential care suites on the project site from 86 to 109, for an increase of 23 units. Of the 109 units, approximately 10 of the units may have double occupancy; therefore, a total residential population of 119 is anticipated, or an increase of up to 33 residents compared to existing conditions.

As discussed in Section E.3, Population and Housing, in Appendix B of this draft EIR, the proposed project is intended to serve the existing demand for residential care services within the community. Further, as an age-restricted residential care facility, the proposed project is considered an institutional care facility, that would only serve a particular segment of the population. Current and future elderly individuals who are served by the residential care facility would likely come from within San Francisco and surrounding communities.

It is anticipated that a total of 75 staff members would be on site on a typical day, which would be an increase of 22 staff members as compared to existing conditions and the increase in employees would be accommodated by the City's current and future housing stock. The project is in a developed urban area with available access to necessary infrastructure and services (transportation, utilities, schools, parks, hospitals, etc.). The number of construction workers would vary throughout the 29 months of construction, depending on the specific construction phase. As discussed in the initial study (Section E.3), construction of the proposed project would not cause substantial population growth or a substantial increase in housing demand in the region. It is anticipated that construction employees who are not already living in San Francisco would likely commute from their residences elsewhere in the Bay Area rather than permanently relocate to San Francisco from more distant locations; this is typical for employees in the various construction trades. Therefore, construction of the proposed would not exceed regional projections for employment in San Francisco.

Typical growth-inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or underserved area, or the removal of major barriers to development from construction of utility infrastructure with the capacity to serve new growth. As discussed in Chapter 2, Project Description, of this draft EIR, the proposed project consists of construction of 23 residential care units at an existing residential care facility, on a single parcel of land in San Francisco; the project is on an infill site surrounded by existing urban development and served by existing infrastructure. Since the project site is located in an established urban neighborhood and is not an infrastructure project, it would not indirectly induce substantial population growth.

As discussed in Section E.6, Transportation and Circulation, in Appendix B of this draft EIR, the proposed project would not extend existing roadways into undeveloped areas or increase the capacity of other local or regional transportation facilities. As discussed in Section E.13, Utilities and Service Systems, in Appendix B of this draft EIR, existing utility infrastructure would have the capacity to serve the proposed project and would not induce growth indirectly through the extension of roads or other infrastructure.

4.B Significant and Unavoidable Environmental Effects

CEQA Guidelines sections 15126(b) and 15126.2(c) require an EIR to include a discussion of any significant environmental impacts that cannot be avoided if the project is implemented. As discussed throughout Chapter 3 of this EIR and in Appendix B, all impacts identified related to the proposed project would be either less than significant or would be mitigated to a less-than-significant level.

Chapter 3 and Appendix B of this EIR identify all significant and potentially significant environmental impacts related to implementing the proposed project; identify feasible mitigation measures that could avoid or reduce these significant and potentially significant impacts; and present a

determination whether these mitigation measures would reduce these impacts to less-than-significant levels.

Based on the environmental analyses in this EIR, the proposed project would not result in significant and unavoidable environmental impacts.

4.C Significant Irreversible Changes

CEQA Guidelines section 15126(c) provides that an EIR shall include a detailed statement setting forth "[i]n a separate section…[a]ny significant effects on the environment that would be irreversible if the Project is implemented." Accordingly, CEQA Guidelines section 15126.2(d) provides the following guidance for analyzing the significant irreversible environmental changes of a Project:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irretrievable damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Development of the proposed project would use both renewable and nonrenewable natural resources during both construction and operation. Energy use associated with construction of the proposed project would include the use of diesel fuel from on-road hauling trips and off-road construction diesel equipment, and gasoline and diesel fuel consumption from on-road worker commute and vendor trips. These energy expenditures would be temporary and limited to the duration of the 29-month construction period. Other nonrenewable and slowly renewable resources consumed as a result of development of the new buildings would include, but would not necessarily be limited to, lumber and other forest products, sand and gravel, cement, asphalt, steel, other building materials, and water. There are no unusual characteristics of the project that would necessitate the use of construction equipment that would be less energy efficient than at comparable construction sites in other parts of the City and region. Therefore, it is not expected that construction fuel consumption associated with the proposed project would be more inefficient, wasteful, or unnecessary than at other construction sites in the region.

The proposed project would commit future generations to an irreversible commitment of energy. Energy use associated with operation of the proposed project would include onsite electricity use (e.g., building space heating, cooling, and lighting, as well as operation of equipment and machines); electricity for offsite water treatment and distribution; and fuel for vehicle travel, including commute trips by onsite employees as they commute to and from work.

Operation of the proposed project would require an ongoing commitment of potable water for building occupants and landscaping. Energy conservation design features to meet state and local goals for energy efficiency and renewable energy have been incorporated into the project design to further reduce wasteful, inefficient, and unnecessary consumption of energy during project operations. The proposed project would comply with Title 24 of the California Code of Regulations as well as with all mandatory elements of the California Green Building Standards Code, and the San

Francisco Green Building Code. See Section E.13, Utilities and Service Systems and Section E.19, Energy, in Appendix B of this draft EIR for further discussion.

The proposed project would also incorporate TDM measures. These features would minimize the amount of transportation fuel consumed. Furthermore, the project site is in an area with a lower level of VMT per capita, in comparison to the regional average. See section E.6, Transportation and Circulation, in Appendix B of this draft EIR for further discussion.

The proposed project would not result in irreversible damage from environmental accidents, such as an accidental spill of a hazardous material. During construction and operation, the proposed project could require routine transport, use, and storage of hazardous materials. In the State of California, the storage and use of hazardous substances are strictly regulated and enforced by local, regional, and state agencies to prevent impacts related to environmental accidents (see Section E.18, Hazards and Hazardous Materials, in Appendix B of this draft EIR for further discussion). In San Francisco, articles 21 and 21A of the San Francisco Health Code enforce mandatory measures to minimize the risk of a hazardous materials release, and article 22A of the San Francisco Health Code, commonly referred to as the Maher Ordinance, provides measures for safe handling of hazardous soils in the City. Each of these regulations are specifically designed to protect the public health through improved procedures for the handling of hazardous materials, better technology in the equipment used to transport these materials, and a more coordinated, quicker response to emergencies. The nature of construction and operation would not involve unusual amounts or types of hazardous materials that could result in irreversible damage from an accidental release and would not pose any greater risk of upset or accident than the existing uses at the site or elsewhere in the City and region.

4.D Areas of Known Controversy and Issues to be Resolved

As discussed in Chapter 1, Introduction, the planning department published a NOP for the proposed project on November 1, 2023; and sent a notice of availability of these documents to governmental agencies, organizations, and persons who may have an interest in the project. The NOP and comments received are included as Appendix A. The NOP requested that agencies and interested parties' comment on environmental issues that should be addressed in the draft EIR. The 30-day comment period concluded on December 1, 2023; the planning department received 37 comment letters by the close of the comment period. The planning department considered the comments from all letters received in preparing the draft EIR.

Due to procedural errors, an NOA of NOP and NOP were reissued for an additional 30-day public review period, from May 8, 2024, to June 7, 2024.[1] One comment letter was received during the 30-day comment period which began on May 8, 2024, and ended on June 7, 2024; this is included in Appendix A.2. Comments received during the November 1 through December 1, 2023 public review period remain valid and are considered equally in the initial study and EIR.

Comments related to the merits of the proposed project or to other matters not addressed by CEQA (i.e., the purpose of CEQA is to ensure that the lead agency and the public are informed of the physical

[1] The two procedural errors in the November 2023 publication were failing to submit such documents to the State Clearinghouse and failure to provide notice in a newspaper of general circulation, pursuant to California Public Resources Code, section 21080.4(a); CEQA Guidelines section 15082; and Chapter 31.11 of the San Francisco Administrative Code.

environmental changes resulting from a project), will be provided to decision-makers as part of the entitlement process. Potential areas of controversy and issues to be resolved for the proposed project or as expressed by agencies and community members include the following:

- Impacts related to archeological and tribal cultural resources
- Impacts on the operation of public transportation
- Impacts from construction noise
- Air quality impacts from construction and excavation in an Air Pollutant Exposure Zone area
- Impacts to greenhouse gas emissions
- Impacts from increased shadows on open spaces and parks
- Impacts on traffic congestion and parking
- Potential for subsidence and liquefaction
- Impacts from hazards and hazardous materials due to the proposed project's proximity to contaminated soils
- Potential for airborne hazards from asbestos and lead-based paints
- Impacts on scenic views and vistas
- New sources of light and glare
- Impacts to historic resources from excavation
- Impacts to the integrity of a historic resource
- Inconsistencies with the City Zoning and Municipal Code
- Impacts to potential candidate or special status species from project implementation

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CHAPTER 5 ALTERNATIVES

5.A Introduction

This chapter presents the alternatives analysis as required by CEQA for the proposed project. The discussion includes the methodology used to select alternatives to the proposed project for detailed CEQA analysis. The intent of this process is to develop potentially feasible alternatives that could avoid or substantially lessen the significant impacts identified while still meeting most of the project's basic objectives as outlined in Section 5.A.1 below. This chapter identifies a reasonable range of alternatives that meet these criteria and evaluates them for their comparative merits with respect to minimizing adverse environmental effects.

This chapter is divided into five subsections:

- **Section 5.A, Introduction**, describes the CEQA requirements for an alternatives analysis.
- **Section 5.B, Alternatives Screening and Selection,** describes the basis for selecting the alternatives analyzed in this EIR; it reviews the project objectives, summarizes the significant impacts of the project that were identified in Chapter 3 of this EIR, and describes the alternatives screening and selection process.
- **Section 5.C, Alternatives Analysis,** presents a detailed analysis and evaluation of the environmental impacts of each of the alternatives.
- **Section 5.D, Comparison of Alternatives and Environmentally Superior Alternative**, presents a comparison of alternatives' impacts and identifies the environmentally superior alternative, based on the described analysis.
- **Section 5.E, Alternatives Considered but Rejected**, discusses alternative concepts that were considered but rejected from further study.

5.A.1 CEQA Requirements for Alternatives Analysis

CEQA Guidelines section 15126.6(a) states that an environmental impact report (EIR) must describe and evaluate a reasonable range of alternatives to a project that would feasibly attain most of the project's basic objectives but avoid or substantially lessen any identified significant adverse environmental effects of the project.

The EIR must evaluate the comparative merits of the alternatives and include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. Specifically, the CEQA Guidelines set forth the following criteria for selecting and evaluating alternatives:

- An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible." (CEQA Guidelines section 15126.6(a))

- "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (CEQA Guidelines section 15126.6(b))
- "The range of potential alternatives shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects." (CEQA Guidelines section 15126.6(c))
- "The specific alternative of 'no project' shall also be evaluated along with its impact." (CEQA Guidelines section 15126.6(e)(1))
- "The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making." (CEQA Guidelines section 15126.6(f))

5.B Alternatives Screening and Selection

An alternative selected for analysis must meet the following three criteria: (1) the alternative would attain most of the project's basic objectives, (2) the alternative would avoid or substantially lessen the significant environmental impacts of the project, and (3) the alternative would be potentially feasible. An EIR need not consider an alternative that cannot be reasonably ascertained and implementation of which is remote and speculative. Furthermore, an EIR need not consider every conceivable alternative but must consider a reasonable range of alternatives to foster informed decision-making and public participation. There is no rule specifying a particular number of alternatives that must be included.

The alternatives selection process was focused on identifying alternative concepts that would avoid or lessen project construction related impacts to historic resources, air quality, construction vibration, archeological resources, human remains, tribal cultural resources, and biological resources. Strategies to avoid or lessen significant environmental impacts primarily involved reducing the extent of ground disturbance and amount of development that could occur with implementation of the proposed project, thereby reducing significant impacts. The planning department then screened the potential alternatives for their feasibility and ability to meet most of the project objectives. This process resulted in the selection of two alternatives to be carried forward for detailed evaluation, in addition to the No Project Alternative. The planning department determined that these alternatives to the proposed project, along with the No Project Alternative, represent a reasonable range of alternatives described and analyzed in this draft EIR.

5.B.1 Project Objectives

As presented in Chapter 2, Project Description, the project sponsor seeks to achieve the following objectives by undertaking the proposed project, which are presented below for use in the identification, selection, and evaluation of alternatives.

- Meet area senior care demands by increasing the number of care suites and making operational improvements;

- Modernize the existing residential care facility to continue attracting new residents and provide high-quality care and services for seniors in San Francisco;
- Maintain the historic Julia Morgan Building, Caretaker's Cottage, and original landscape features of the front lawn on the project site;
- Minimize neighborhood on-street parking and loading demand by building adequate parking and loading access on-site to serve the needs of project residents, workers, suppliers, and visitors.

5.B.2 Strategies to Avoid or Lessen Significant Impacts

The draft EIR does not identify any significant and unavoidable impacts. All significant or potentially significant impacts from implementation of the proposed project would be mitigated to a less than significant level with incorporation of mitigation measures identified in the draft EIR and initial study. Although no significant and unavoidable impacts were identified for the proposed project, the alternatives were tailored to reduce impacts to the built historic resources identified on site by further minimizing construction activity on the project site. In addition, the alternatives were also tailored to minimize air quality and vibration impacts and impacts to archeological, tribal cultural, and biological resources by reducing the proposed amount of construction, including excavation, associated with the project.

5.B.3 Alternatives Selected for Detailed Analysis

Based on the screening process described above, the following alternatives were selected for detailed analysis in this draft EIR:

- **No Project Alternative:** Under the No Project Alternative, there would be no modifications to the existing buildings or landscaping at 3400 Laguna Street. The project site would remain as is and no construction, including excavation, would occur.
- **Rehabilitation Alternative:** The Rehabilitation Alternative would reconfigure the programming inside the existing buildings to add four new residential care suites. The existing buildings on the site would remain, with interior and exterior renovations to the Julia Morgan Building and interior renovations to all the remaining buildings. No ground disturbance would occur.
- **Reduced Construction Alternative:** The Reduced Construction Alternative would demolish the existing, non-historic Health Center and construct the new Francisco Building, including a basement and building height no greater than 40 feet. The Reduced Construction Alternative would add 12 new residential care suites and renovate the existing remaining buildings. This alternative would involve less excavation and a shorter construction timeline than the proposed project.

These three alternatives were determined to adequately represent the range of feasible alternatives required under CEQA for this project. These alternatives would lessen adverse impacts related to historic architectural resources, air quality, archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources that were identified for the proposed project.

Table 5-1, Comparison of Proposed Project and Alternatives summarizes and compares the characteristics of the proposed project with those of each project alternative. Detailed descriptions of each alternative are presented in Section 5.C, Alternatives Analysis, including the assumptions used in analyzing their environmental impacts. For each alternative, the descriptions include land uses and features that differ from the proposed project, and construction assumptions.

Table 5-1 Comparison of Proposed Project and Alternatives

Project Characteristics	Proposed Project	No Project Alternative	Rehabilitation Alternative	Reduced Construction Alternative
Project Rendering				
Number of Buildings	5	5	5	5
Building Stories	3–4	1–4	1–4	3–4
Building Heights (feet)	22–41[1]	15–41	15–41	22–41
Building Gross Square Feet (gsf)	141,580	83,200	83,200	120,326
Residential Care Suites	109	86	90	98
Useable Open Space (gsf)	26,410	30,280	30,280	29,100
Off-Street Parking (spaces)	36	17	17	17
Excavation Depth (feet)	15	No additional	No additional	15
Ground Disturbance (cubic yards)	9,600	None	None	600
Entitlements	CU/PUD	None	No planning approvals	CU/PUD

Source: HKS Inc. (April 2024).
Note: References to 41-foot height reflect that the existing Perry Building has been measured at 40.5 feet tall, so with rounding is described as 41 feet tall. No changes to the Perry Building would increase its height and no other building on the project site would exceed 40 feet in height under the proposed project or any alternative.

CU/PUD = Conditional Use/Planned Unit Development

5.C Alternatives Analysis

This section presents a detailed description of each alternative and analysis of the selected alternatives' potential environmental impacts compared to the proposed project.

5.C.1 No Project Alternative

As required by CEQA Guidelines section 15126.6(e), a no project alternative is evaluated in this draft EIR to allow decision makers to compare the environmental effects of approving the proposed project with the effects of not approving the project. CEQA Guidelines section 15126.6(e)(2) requires that the no project alternative analysis "discuss the existing conditions … as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services." The no project alternative would not preclude development of the site by another project in the future. Currently, there are no other development proposals pending at the project site. Therefore, pursuant to CEQA Guidelines section 15126.6(e)(3)(B), the no project alternative for purposes of this analysis is considered "no build" wherein the existing environmental setting is maintained and is the circumstance in which the project does not proceed.

No Project Alternative Description

Under the No Project Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Thus, the project site would continue to operate as a residential care facility with the same number of existing care suites. The No Project Alternative would not result in demolition of the Perry Connector and the Health Center or construction of two new buildings (the Bay Building and the Francisco Building). The No Project Alternative would also not include renovations of the Julia Morgan Building or the Perry Building beyond ongoing maintenance. The gross square footage of building area on the project site would remain at 83,200 square feet and the number of residential suites would remain unchanged. Under the No Project alternative, there would be no construction of the below grade parking garage and no changes to on-street parking or loading, nor would the current off-street loading configuration change. There would be no replacement of the heating and cooling system, no elimination of natural gas service to existing buildings, and no energy or accessibility improvements. Additionally, there would be no changes to the landscaping on the project site.

The existing development controls on the project site would continue to govern site development and would not be changed. Similar to the proposed project, there would be no amendments to the general plan, planning code, or zoning map. The project site would remain under the existing RM-1 (Residential-Mixed, Low Density) Zoning District, and a 40-X Height and Bulk District.

No Project Alternative Impact Analysis

This environmental analysis assumes that the existing uses on the project site would not change and that the existing physical conditions described in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, and Appendix B, Initial Study, Section E, Evaluation of Environmental Effects, would remain the same. If the No Project Alternative were to proceed, no changes would be implemented, and none of the impacts associated with the proposed project would occur. However, incremental changes would be expected to occur in the vicinity of the project site as nearby reasonably foreseeable cumulative projects (see Section 3.A.5 of this draft EIR) are approved, constructed, and become operational. With no change to existing site conditions under the No Project

Alternative, land use activity on the project site would not contribute to significant cumulative impacts beyond existing levels.

Historic Architectural Resources

Under the No Project Alternative, as with the proposed project, the existing uses on the project site would not change, and the Caretaker's Cottage and the Front Lawn would remain unaltered. As with the proposed project no character-altering changes would be made to the Julia Morgan Building. Only essential repairs would be made to the Julia Morgan Building, which would not be rehabilitated. The lack of demolition or construction adjacent to the historic resources would avoid potential impacts due to construction, and no change in visual context would occur. Therefore, the less than significant with mitigation impact on historic architectural resources (Impact CR-1, Section 3.A, Historical Architectural Resources) attributable to the proposed project would not occur. Compared to the proposed project, the No Project Alternative would not have any project-level nor cumulative impacts related to historic architectural resources and would not require the implementation of mitigation measures.

Air Quality

Under the No Project Alternative, the existing uses on the project site would not change. There would be no demolition or construction of new buildings and therefore construction phase impacts to air quality (Impact AQ-4 and Impact C-AQ-2) would not occur. As such the mitigation measures developed for construction of the proposed project would not be required. Compared to the proposed project, the No Project Alternative would not have any project-level or cumulative impacts related to construction-period air quality and would not require the implementation of mitigation measures.

In addition, operationally the No Project Alternative would not result in any impacts related to applicable air quality plans, or any increase in cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin, or in other emissions (such as those leading to odors) adversely affecting a substantial number of people. The No Project Alternative would have no impact as it relates to these topics. However, the No Project Alternative would not include any of the proposed project's improvements to the existing facilities, including modernization of the on-site heating and cooling system and replacement of the facilities' existing emergency generator with one that would reduce existing air pollutant and toxic air contaminant emissions.

Other Issues Analyzed in the Initial Study

The initial study (Appendix B) of this draft EIR concluded that the proposed project would have no impacts or less than significant impacts related to the following environmental resource areas: land use and land use planning, population and housing, transportation, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, noise (besides construction vibration), energy resources, agriculture and forestry resources, and wildfire. The proposed project would require the implementation of mitigation measures to avoid or minimize significant construction related impacts to archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources.

The No Project Alternative would result in no project level or cumulative impacts related to any of these environmental topics as this alternative would not result in changes to existing site conditions. Since there would be no ground disturbance, new construction, tree removal, or use of vibration-

generating construction equipment at the site under the No Project Alternative, mitigation measures presented in the initial study would not be required under the No Project Alternative and all the less-than-significant impacts identified in the initial study would be avoided.

Ability of the No Project Alternative to Meet Project Objectives

As shown in Table 5-3, provided in Section 5.D below, the No Project Alternative would meet the project objective of maintaining the historic Julia Morgan Building and front lawn; but would not meet the other project objectives. Under the No Project Alternative, the existing residential care capacity on the project site would be retained, and no new building construction would take place, thus not meeting the project objectives related to increasing the number of senior care suites, modernizing the existing facilities or minimizing neighborhood on-street parking and loading demand.

5.C.2 Rehabilitation Alternative

The purpose of this alternative is to avoid or substantially reduce the less than significant with mitigation impact on historic resources that would occur under the proposed project.

Rehabilitation Alternative Description

Under the Rehabilitation Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Under the Rehabilitation Alternative, the proposed project would continue to operate as a residential care facility and would expand the number of residential care suites from 86 to 90, which would be 19 fewer suites than the proposed project. The Rehabilitation Alternative would not result in the demolition of the existing Perry Connector and the Health Center buildings or construction of two new buildings (the Bay Building and the Francisco Building).

Similar to the proposed project, the Rehabilitation Alternative would renovate the existing Julia Morgan Building and the Perry Building, and rehabilitate the façade of the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, heating and cooling system modernization, re-pointing of bricks where needed, and roof repairs, where needed, in conformance with the Secretary of the Interior's Standards for Rehabilitation. Within the Julia Morgan Building, the Rehabilitation Alternative would reconfigure existing interior spaces to enable the addition of four new residential care suites and improve spaces for resident amenities. The Rehabilitation Alternative would renovate the Perry Building by updating the appearance of existing residential care suites to help modernize the facility.

Under the Rehabilitation Alternative, the interiors of the existing Health Center and Perry Connector buildings would also be renovated: the Health Center would become the front office area to ensure Americans with Disability Act compliant access and the Perry Connector Building would receive major upgrades, including updated mechanical systems.

The gross square footage of the project site would remain the same as the existing property at 83,200 gsf. Under the Rehabilitation Alternative, there would be no construction of the below-grade parking garage and no changes to on-street parking or loading operations, nor would the current off-street loading configuration change. Additionally, there would be no changes to the front lawn or interior courtyards' landscaping on the project site.

The existing development controls on the project site would continue to govern site development and would not be changed. Like the proposed project, there would be no amendments to the general plan, planning code, or zoning map. The project site would remain under the existing RM-1 (Residential-Mixed, Low Density) Zoning District, and a 40-X Height and Bulk District.

Rehabilitation Alternative Impact Analysis

Historic Architectural Resources

Under the Rehabilitation Alternative project impacts to historic resources would be minimized. Like the proposed project, modifications to the Julia Morgan Building would be in conformance with the Secretary of the Interiors Standards for Rehabilitation. The Rehabilitation Alternative would not alter the existing visual context of the two identified historic resources on site, the Julia Morgan Building and the Caretaker's Cottage, as it would not include any demolition or construction of buildings. Even though the Rehabilitation Alternative would include renovations of existing buildings, similar to the proposed project, the lack of new construction would avoid significant impacts related to changes in visual context. The Rehabilitation Alternative would not require implementation of Mitigation Measure M-CR-1 because the Rehabilitation Alternative would not include demolition or new construction that could potentially result in accidental damage to the on-site historic resources.

Similar to the proposed project, the Rehabilitation Alternative would not combine with cumulative projects to result in a significant impact on any of the identified historic resources in the adjacent vicinity. The Rehabilitation Alternative would be located at 3400 Laguna Street which has no aesthetic or historic relationship with the marina and the proposed project at 3400 Laguna Street does not have the potential to combine with the Marina Improvement and Remediation Project to negatively affect historic resources. As such, impacts would be less than significant, similar to the proposed project (albeit this alternative's historic resources impacts would be less than under the proposed project).

Air Quality

Under the Rehabilitation Alternative, the existing uses on the project site would not change. There would be no demolition or construction of new buildings and therefore significant impacts to construction-period air quality (Impact AQ-4 and Impact C-AQ-2) would not occur. As such, Mitigation Measure M-AQ-4 developed for the proposed project would not be required. Compared to the proposed project, the Rehabilitation Alternative would have less project-level and cumulative air quality impacts.

In addition, compared to the proposed project, the Rehabilitation Alternative would result in reduced project level impacts related to compliance with applicable air quality plans, cumulatively considerable net increases in non-attainment criteria air pollutants within the air basin, and other emissions (such as those leading to odors) adversely affecting a substantial number of people, as it would include a smaller development footprint than the proposed project.

Other Issues Analyzed in the Initial Study

The initial study (Appendix B) of this draft EIR concluded that the proposed project would have no impacts or less-than-significant impacts related to the following environmental resource areas: land use and land use planning, population and housing, transportation, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, noise (besides construction vibration), energy resources, agriculture and forestry resources, and wildfire. The proposed project

would require the implementation of mitigation measures to avoid or minimize significant construction-related impacts to archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources.

The Rehabilitation Alternative would result in no impacts related to any of these environmental topics because this alternative would result in no changes to existing site conditions. Due to the fact that there would be no ground disturbance, tree removal, use of vibration generating construction equipment, or new building construction at the site under the Rehabilitation Alternative, mitigation measures presented in the initial study would not be required under the Rehabilitation Alternative. All of the significant or potentially significant impacts identified in the initial study would be avoided or reduced and would either result in a less-than-significant or no impact finding, thus minimizing impacts compared to the proposed project.

Ability of the Rehabilitation Alternative to Meet Project Objectives

Under the Rehabilitation Alternative the residential care capacity would be slightly increased from existing conditions, with the addition of four new residential care suites, and no new building construction would take place, thus partially meeting the project objective related to increasing the availability of senior care facilities. While the Rehabilitation Alternative would partially meet the project objective of modernizing the existing facilities, by including the proposed renovations to the Julia Morgan Building and the Perry Building, it would create only four additional residential care suites, compared to 23 new suites under the proposed project. Therefore, while the Rehabilitation Alternative would meet the project objective of maintaining the historic Julia Morgan Building and front lawn, it would only partially meet the project objectives related to increasing the availability of senior care suites and modernizing the residential care facility and would not meet the objective related to minimizing on-street parking and loading demand in the neighborhood.

5.C.3 Reduced Construction Alternative

The purpose of this alternative is to reduce the proposed project's less-than-significant with mitigation impacts to historic architectural resources, construction-period air quality, archeological resources, human remains, tribal cultural resources, and building damage caused by construction vibration.

Reduced Construction Alternative Description

Under the Reduced Construction Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Instead, the project site would continue to operate as a residential care facility and would add 12 residential care suites for a total of 98, which would be 11 fewer suites than the proposed project. The Reduced Construction Alternative would have a smaller construction footprint than the proposed project, as it would result in the construction of only one new building, the proposed Francisco Building, and would retain the Perry Connector building. The proposed Francisco Building would be constructed in a similar manner and height (40 feet) as the proposed project. The Bay Building, as proposed by the project, would not be constructed under this alternative.

The Reduced Construction Alternative, similar to the proposed project, would renovate the interior and exterior of the existing Perry Building and the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, heating and cooling system

modernization, re-pointing of bricks where needed, and roof repairs, where needed, in conformance with the Secretary of the Interior's Standards for Rehabilitation. Within the Julia Morgan Building, the Reduced Construction Alternative would also reconfigure existing spaces to enable the addition of four new residential care suites and improve spaces for resident amenities. Under the Reduced Construction Alternative, the interior of the existing Perry Connector Building would be renovated, and the amenities spaces would be redesigned.

The Reduced Construction Alternative would not construct the underground parking structure, but it would require the excavation of approximately 600 cubic yards of soil up to 15 feet deep to enable construction of below-grade common areas beneath the proposed Francisco Building. The Reduced Construction Alternative would retain the existing on-site parking and would be required to implement bulb out improvements similar to the proposed project.

Reduced Construction Alternative Impact Analysis

Historic Architectural Resources

Under the Reduced Construction Alternative, the project impacts to historic resources would be reduced. The Reduced Construction Alternative would still require the implementation of Mitigation Measure M-CR-1: Best Practices and Construction Monitoring Program for Historic Resources, as it would include construction adjacent to the Julia Morgan Building that could potentially result in accidental damage to the building. The Reduced Construction Alternative would reduce changes to the visual context of the two identified historic resources on the project site, the Julia Morgan Building and the Caretaker's Cottage, compared to the proposed project. This alternative would only include the construction of the proposed Francisco Building and would retain the Perry Connector building. Even though the Reduced Construction Alternative would include proposed renovations similar to the proposed project, the reduced construction would result in fewer changes in the visual context of the onsite historic buildings and would minimize potential impacts due to construction. Additionally, the Reduced Construction Alternative would require the use of vibration generating construction equipment that could also result in damage to onsite historic resources, requiring implementation of Mitigation Measure M-NO-2: Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction. With implementation of M-CR-1 and M-NO-2 the Reduced Construction Alternative would have a less than significant impact to historic resources, similar to the proposed project (albeit this alternative's historic resources impacts would be less than under the proposed project).

Air Quality

Similar to the proposed project, the Reduced Construction Alternative would include demolition and grading activities as part of project construction. The Reduced Construction Alternative would result in 600 cubic yards of ground disturbance, compared to the 9,600 cubic yards for the proposed project. The reduced amount of ground disturbance would translate into a reduction in truck trips and use of construction equipment and associated emissions. As such, the Reduced Construction Alternative would have reduced air quality impacts compared to the proposed project. Therefore, like the proposed project, the Reduced Construction Alternative would result in less than significant construction and operational criteria air pollutant emissions.

The Reduced Construction Alternative would potentially result in concentrations of construction cancer risk and $PM_{2.5}$ concentrations from the proposed construction that could result in significant

impacts to the nearest off-site residential and childcare receptors, and as such Mitigation Measure M-AQ-4: Requirements for Off-Road Construction Equipment, would still be required. Similar to the proposed project, the Reduced Construction Alternative would result in a less-than-significant impact with Mitigation Measure M-AQ-4. Compared to the proposed project, the Reduced Construction Alternative would result in reduced impacts to air quality.

In addition, compared to the proposed project, the Reduced Construction Alternative would result in reduced project-level impacts related to applicable air quality plans, cumulatively considerable net increases in non-attainment criteria air pollutants within the air basin, and other emissions (such as those leading to odors) adversely affecting a substantial number of people, as it would include a smaller development footprint than the proposed project.

Other Issues Analyzed in the Initial Study

The initial study (Appendix B) of this draft EIR concluded that the proposed project would have no impacts or less-than-significant impacts related to the following environmental resource areas: land use and land use planning, population and housing, transportation, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, noise (besides construction vibration), energy resources, agriculture and forestry resources, and wildfire. The proposed project would require the implementation of mitigation measures to avoid or minimize significant construction related impacts to archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources.

Compared to the proposed project, impacts resulting from ground disturbance would be reduced due to the smaller footprint of construction and excavation; therefore, any potential impacts related to archeological resources, human remains, and tribal cultural resources would be less. Nevertheless, the Reduced Construction Alternative would result in some ground disturbance and new construction at the site, and this alternative has the potential to significantly impact below ground resources. This alternative would also require the use of vibration generating construction equipment that could damage the remaining buildings on the site. Additionally, the Reduced Construction Alternative would require the removal of 10 trees on the project site, which could provide nesting habitat for avian species. As such, all mitigation measures presented in the initial study would be required under the Reduced Construction Alternative, and all of the potentially significant impacts identified in the initial study would be less than significant with mitigation. However, the Reduced Construction Alternative would result in reduced impacts related to these environmental topics as it would include smaller scale changes to the project site compared to the proposed project.

Ability of the Reduced Construction Alternative to Meet Project Objectives

The Reduced Construction Alternative would meet the objective of maintaining the historic resources on the site and would partially meet two project objectives through an increase of 12 residential care suites on the project site (compared to an increase of 23 new suites under the proposed project) and partial modernization of facilities. Under the Reduced Construction Alternative, the bulb-out street improvements would be constructed, while current off-street parking facilities and loading conditions would not be improved. Therefore the Reduced Construction Alternative would not meet the project objective related to minimizing neighborhood on-street parking and loading demand.

5.D Comparison of Alternatives and Environmentally Superior Alternative

5.D.1 Alternatives Summary of Impacts and Ability to Meet Project Objectives

Table 5-2, Comparison of Environmental Impacts of the Proposed Project and Alternatives identifies the level of impact for the proposed project and each alternative (e.g., no impact, less than significant impact, less-than-significant impact with mitigation) and whether the impact of the alternative would be the same as, less than, or greater than the proposed project impacts. In some cases, the proposed project and alternative would result in the same significance determination, but the degree of that impact with the alternative might be less than, greater than, or similar to that of the proposed project. When an alternative's impact would be less than the proposed project, the "<" symbol is used to represent reduced impacts; for similar or equal impacts, the "=" sign is used.

Table 5-2 Comparison of Environmental Impacts of the Proposed Project and Alternatives

Environmental Impact	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
EIR Section 3.B, Historic Resources				
Impact CR-1: The proposed project may cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code.	LTSM	NI <	LTS <	LTSM <
Impact-C-CR-1: The proposed project, in combination with cumulative projects, may cause a substantial adverse change in the significance of a historical resource.	LTS	NI <	LTS <	LTS <
EIR Section 3.C, Air Quality				
Impact AQ-2: The proposed project's construction activities would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the basin.	LTS	NI <	LTS <	LTS <

Table 5-2 Comparison of Environmental Impacts of the Proposed Project and Alternatives

Environmental Impact	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
Impact AQ-4: The proposed project would expose sensitive receptors to substantial pollutant concentrations.	LTSM	NI <	LTS <	LTSM <
Impact C-AQ-4: Construction of the proposed project, in combination with cumulative projects, would expose sensitive receptors to substantial pollutant concentrations.	LTSM	NI <	LTS <	LTSM <
INITIAL STUDY – LESS THAN SIGNIFICANT WITH MITIGATION TOPICS				
Section E.4, Cultural Resources				
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archeological resource.	LTSM	NI <	LTS <	LTSM <
Impact CR-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries.	LTSM	NI <	LTS <	LTSM <
Section E.5, Tribal Cultural Resources				
Impact TC-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.	LTSM	NI <	LTS <	LTSM <
Section E.7, Noise				
Impact NO-2: The proposed project would generate excessive	LTSM	NI <	LTS <	LTSM <

Table 5-2 Comparison of Environmental Impacts of the Proposed Project and Alternatives

Environmental Impact	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
groundborne vibration or groundborne noise levels.				
Section E.15, Biological Resources				
Impact BI-1: The proposed project could interfere substantially with the movement of 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.	LTSM	NI <	LTS <	LTSM <

Source: Compiled by LSA (2024).
Impact Codes:
NI = no impact
LTS = less than significant
LTSM = less than significant with mitigation
= (equal to proposed project's impact)
< (less than proposed project impact)

A comparison of each alternative and its ability to meet the project objectives compared to the proposed project is summarized below in **Table 5-3, Alternatives Ability to Meet Project Objectives** below. As shown in the table, and described under each alternative discussion above, the No Project Alternative would meet the project objective of maintaining the historic Julia Morgan Building and Caretaker's Cottage and it would not meet any of the other project objectives, as it would not add any additional senior housing suites, would not modernize existing structures and would not minimize on-street loading and parking demand in the surrounding neighborhood.

Table 5-3 Alternatives Ability to Meet Project Objectives

Project Objectives	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
Meet area senior care demands by increasing the number of care suites and making operational improvements.	Yes	No	Partial	Partial
Modernize the existing residential care facility to continue attracting new	Yes	No	Partial	Partial

Table 5-3 Alternatives Ability to Meet Project Objectives

Project Objectives	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
residents and provide high-quality care and services for seniors in San Francisco.				
Maintain the historic Julia Morgan Building, Caretaker's Cottage, and original landscape features of the front lawn on the project site.	Yes	Yes	Yes	Yes
Minimize neighborhood on-street parking and loading demand by building adequate parking and loading access on-site to serve the needs of project residents, workers, suppliers, and visitors.	Yes	No	No	No

Source: Compiled by LSA (2024).

The Rehabilitation Alternative would include the construction of 4 additional care suites and would include improvements to the existing structures. The Rehabilitation Alternative would include the renovation of the existing Julia Morgan Building and the Perry Building, and rehabilitation of the façade of the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, heating and cooling system modernization, re-pointing of bricks where needed, and roof repairs, where needed, in conformance with the Secretary of the Interior's Standards for Rehabilitation. The Rehabilitation Alternative would partially meet the first objective related to increasing the number of care suites and making operational improvements; however, the number of new care suites added would be substantially fewer than under the proposed project. The Rehabilitation Alternative would partially meet the objective to modernize the existing residential care facility, as it would include some of the same improvements as the proposed project but would not replace the 1950s-era Perry Building Connector and Health Center buildings. The Rehabilitation Alternative would meet the objective to maintain the historic Julia Morgan Building and Caretaker's Cottage, as it would maintain the historic features of the eligible structures. This alternative would not meet the project objective related to minimizing on-street parking and loading demand, as it would add additional care suites but not change the off-street parking and loading configuration.

The Reduced Construction Alternative would include the construction of an additional 12 suites and would include improvements to the existing structures. The Reduced Construction Alternative, similar to the proposed project, would renovate the interior and exterior of the existing Perry Building and the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, heating and cooling system modernization, re-pointing of bricks where

needed, and roof repairs, where needed, in conformance with the Secretary of the Interior's Standards for Rehabilitation. The Reduced Construction Alternative would partially meet the objective related to increasing the number of care suites; however, it would be substantially fewer suites than the proposed project. The Reduced Construction Alternative would partially meet the objective to modernize the existing residential care facility, but it would not include the Bay Building, which is a key component of the proposed project's planned modernization of residential amenities. This alternative would maintain the historic features of the eligible structures, similar to the improvements under the proposed project, and would meet the objective to maintain the historic resources on the project site. This alternative would be required to implement bulb out improvements similar to the proposed project. However, it would not meet the objective related to minimizing on-street parking and loading demand (unlike under the proposed project), as it would add residential care suites and reduce the number of on-street parking spaces through installation of the bulb out, without changing the project site's off-street parking or loading capacity.

5.D.2 Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e) requires an EIR to identify the alternative to the proposed project that would have the least adverse environmental impacts (i.e., the "environmentally superior alternative"). Based on the analysis and comparison of the impacts of the alternatives presented above, the No Project Alternative would be the environmentally superior alternative as it would result in no impacts. While the No Project Alternative would cause fewer environmental impacts compared to the proposed project, CEQA Guidelines section 15126.6(e)(2) provides that if the "no project" alternative is the environmentally superior alternative, the EIR should also identify an environmentally superior alternative in addition to the No Project Alternative.

As shown above, the Rehabilitation Alternative would develop an additional 4 suites on the project site and increase the number of available suites from 86 to 90. Compared to the proposed project, the Rehabilitation Alternative would avoid impacts associated with historic resources and would not require the implementation of mitigation measures associated with built historic resources, as would be required under the proposed project. In addition, the Rehabilitation Alternative would minimize potential impacts to below ground resources, would not require the use of vibration-generating construction equipment, and would reduce potential construction air quality impacts. Additionally, mitigation measures presented in the initial study for the proposed project would not be required under the Rehabilitation Alternative. All of the significant or potentially significant impacts identified in the initial study would be avoided or reduced and would either result in a less-than-significant or no impact finding, thus minimizing impacts compared to the proposed project. As such, the Rehabilitation Alternative is considered the environmentally superior alternative.

5.E Alternatives Considered but Rejected

CEQA Guidelines section 15126.6(c) requires an EIR to identify alternatives that were considered by the lead agency throughout the planning process but were ultimately rejected from detailed analysis. The following alternatives were considered but were ultimately rejected for the reasons described below.

5.E.1 Off-Site Alternative

CEQA Guidelines section 15126.6 (a) states that an EIR "shall describe a range of reasonable alternatives to the project *or* to the location of the project, *which would feasibly attain most of the basic objectives of the project* but would avoid or substantially lessen any of the significant effects of the project …" (emphasis added). Because the proposed project's objectives are grounded in continuing Heritage on the Marina's historic use as a residential care facility for seniors, there is no alternative location that could meet this fundamental project objective. Development of an off-site alternative would not meet the objective of modernizing the existing facility. An alternative that would develop senior care suites off-site would only partially meet the objective related to increasing the number of care suites and making operational improvements; new residents of off-site care suites would not benefit from the existing operations at the existing Heritage on the Marina site at 3400 Laguna Street. An off-site alternative would meet the objective of maintaining the historic resources at the site. An off-site alternative would partially meet the objective of minimizing on-street parking and loading demand due to expanding the number of residents and employees offsite.

Under CEQA Guidelines section 15126.6(f)(3), an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. There are no off-site properties nearby that are comparable to the project site.

For both of these reasons, no off-site alternative was carried forward for detailed evaluation.

5.E.2 Reduced Construction (Bay Building Only) Alternative

A second reduced construction alternative was considered for analysis which would include construction of the new Bay Building only, whereas the Reduced Construction Alternative evaluated above includes construction of the Francisco Building only. Such an alternative would only construct the new Bay Building and retain the existing Health Center building in its current condition. This alternative would reduce the proposed project's footprint by approximately 2,000 square feet; however, it would only allow the development of six additional care suites (17 fewer than the proposed project and 6 fewer than the Reduced Construction Alternative). The new Bay Building would include the same uses as those proposed under the proposed project. Under both the proposed project and the rejected potential alternative, construction of the new Bay Building would result in a net increase of two care suites, and four additional care suites would be added within the Julia Morgan Building. In contrast to the proposed project, the rejected potential alternative would not include construction of the new Francisco Building, therefore no additional care suites could be added within that portion of the project site.

The Reduced Construction Alternative (proposed Bay Building only) would require approximately 3,800 cubic yards of excavation, which is 5,800 square feet less than the proposed project but 3,200 square feet more than the Reduced Construction Alternative evaluated above. The Reduced Construction Alternative (proposed Bay Building only) was not further considered as it would have greater ground disturbance and greater impacts to below grade resources such as archeological and tribal cultural resources and human remains than the studied alternatives. In addition, this rejected alternative would result in similar impacts to the proposed project, and therefore would not provide any additional information that is not already considered and evaluated in the above analysis of alternatives. Such an alternative would also not meet the project objectives to the same extent than the identified and evaluated Reduced Construction Alternative already achieves.

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CHAPTER 6 REPORT PREPARATION

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