



**U.S. Department of Housing and Urban
Development**

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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: 249 Pennsylvania Avenue Mixed Use Project

Responsible Entity: San Francisco Mayor's Office of Housing and Community Development
One South Van Ness Avenue, Fifth Floor
San Francisco, California 94103

Grant Recipient (if different than Responsible Entity): Tenderloin Neighborhood Development Corporation

State/Local Identifier:

Preparer: Madeleine Sweet

Certifying Officer Name and Title: Daniel Adams, Director, San Francisco Mayor's Office of Housing and Community Development (MOHCD)

Consultant (if applicable): Rincon Consultants, Inc.

Direct Comments to: Madeleine Sweet, Compliance Coordinator, MOHCD at
Madeleine.Sweet@sfgov.org

Project Location:

The project site is an approximately 21,625 square foot (0.5-acre) lot located at the southeastern corner of the intersection of Pennsylvania Avenue and Mariposa Street (Block 3999, Lot 015) and is located within the City of San Francisco's South of Market District and Potrero Hill neighborhood, zoned Urban Mixed Use (UMU). The project site is located within the Showplace Square/Potrero Area Plan. Figure 1 shows the regional location of the site and Figure 2 shows the project site within a neighborhood context.

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

The project would consist of demolition of an existing vacant building and surface parking lot and construction of a new nine-story mixed-use building. The proposed building would contain approximately 82,900 square feet of residential space, 2,000 square feet of commercial space, and 1,200 square feet of social service space, as well as open space areas such as a garden, courtyard, rain garden, and roof urban farm. Residential space would consist of 60 studio apartments with a unit area of 400 square feet each (for a total of 24,000 square feet of studio apartments); 30 2-bedroom apartments with a unit area of 800 square feet each (for a total of 24,000 square feet of 2-bedroom apartments); and 30 3-bedroom apartments with a unit area of 1,030 square feet each (for a total of 30,900 square feet of 3-bedroom apartments).

Table 1 summarizes the main project components.

Table 1: Project Summary

Use	Size (square feet)	Studio (units)	2-Bedroom (units)	3-Bedroom (units)
Ground Floor and Mezzanine	19,650	0	0	0
Second Floor	13,300	6	0	0
Third Floor	15,250	9	5	5
Fourth Floor	15,250	9	5	5
Fifth Floor	15,250	9	5	5
Sixth Floor	15,250	9	5	5
Seventh Floor	15,250	9	5	5
Eight Floor	8,500	8	3	3
Ninth Floor	4,800	1	2	2
Mechanical Penthouse	1,500	0	0	0
Total Gross Area and Units	124,000	60	30	30
Ground-Floor Common Areas	11,300			
South Garden	1,800			
Courtyard	3,200			
Rain Garden Nook	500			
Roof Urban Farm	5,300			
Total Open Space	10,800			
Rear Yard	5,638			

Figure 2 Project Site Vicinity



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23-15336 BIC
Fig 2 Project Location

The proposed building would include exterior murals that reflect the neighborhood's character, would offer urban agriculture and pollinator gardens, and would include fencing to offer privacy for residents in the proposed outdoor spaces. The project would include ancillary spaces for laundry, bicycle parking, trash, storage, and property management.

Project construction is anticipated to begin in October 2026. Approximately 10,100 cubic yards of material are anticipated to be exported from the project site during site preparation.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The availability of housing, particularly affordable housing, is an ongoing concern in the San Francisco Bay Area. The regional council of governments, the Association of Bay Area Governments (ABAG), estimates that at least 41 percent of new housing demand will be from low and very low income households (households earning 80 percent, or less, of area median income), and another 17 percent will be from households of moderate means (earning between 80 and 120 percent of area median income). To conform to California State Senate Bill 375, which mandates sustainable development with a focus on urban areas, ABAG calculates that the City and County of San Francisco (City) would need to add 82,069 new units to its total housing supply by the year 2031. Of the 82,069 new units, 20,867 would need to be very low income, 12,014 would need to be low income, 13,717 would need to be moderate income, and 35,471 would need to be above moderate income.

The City's General Plan Housing Element includes policies that direct the City to increase development of affordable housing. For example, Policy 24 states that the City shall "enable mixed-income development projects to maximize the number of permanently affordable housing units constructed, in balance with delivering other permanent community benefits that advance racial and social equity." The Housing Element identifies that as the cost of living in San Francisco has increased over the years, the City has lost diversity that once defined its identity, and that families and middle-wage workers are confronted with limited housing choices. Consequently, many residents are forced to find housing choices that meet their needs across the San Francisco Bay, or further away, and endure long commute hours. The Housing Element notes that the City has been unable to provide the needed housing for the diversity of workers that its economy requires, and most importantly the housing for its diverse cultures and communities that define the essential values of San Francisco.

The proposed project is programmed to comply with Housing Element policies by providing 100 percent affordable housing in the South of Market District and Potrero Hill neighborhood. The provision of 120 affordable housing units would accommodate a portion of the ABAG-projected demand for affordable housing. Furthermore, the proposed action would provide affordable housing in an area that is well-served by public transit. The project site is within 0.5 mile of the Balboa Park San Francisco Municipal Railway (MUNI) station at 3rd Street. The project would provide housing connected by public transportation to major employment, retail, and cultural centers in the City. Finally, the proposed action would support the City's goals of ending chronic homelessness and increasing the availability of affordable housing units.

Sources: 1, 2

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site is located within the Potrero Hill neighborhood of the City of San Francisco. The Potrero Hill neighborhood is generally bounded by 16th Street to the north, U.S. 101 to the west, Cesar Chavez Street to the south, and the San Francisco Bay to the east. The project site is located in the 40-X UMU Zoning District, which also applies to the lots to the west of the project site, across Pennsylvania Avenue. The UMU Zoning District is intended to promote a vibrant mix of uses while maintaining the characteristics of this formerly industrially zoned area. Within the UMU Zoning District, housing is permitted but subject to higher affordability requirements than housing in other zones. Under current zoning, the project site's capacity is limited by its Height and Bulk designation, 40-X, which caps the maximum allowable height at 40 feet. However, allowances under Assembly Bill (AB) 1763 would permit the project to be constructed at its proposed height of 123 feet.

The rectangular, 21,625 square foot (0.5-acre) project site is currently developed with a parking lot and vacant building. The project site and adjacent street frontages lack ground-level vegetation. The parking lot north of the existing structure is currently closed off from public street access with chain link fencing with a gate on the western side, along Pennsylvania Avenue. The project site contains two existing curb cuts for ingress/egress, one along Pennsylvania Avenue and one along Mariposa Street. Mixed-use and residential buildings surround the project site to the west and southwest. South of the project site is Pennsylvania Garden, a public park. The project site is adjacent to U.S. 280 to the east. Buildings that surround the project site are multi-story, ranging from two-story to three-story, and include ground-floor commercial establishments.

San Francisco is one of the nation's most expensive cities with one of the highest median listed rents in the nation. According to the Compass Home Prices, Conditions, and Trends in the San Francisco Bay Area report, the average rent in San Francisco peaked in 2015 and plummeted in late 2020, during the COVID-19 pandemic. Through the pandemic, the State of California implemented rent protections to keep those affected by COVID-19 from losing their homes. In late 2023, rent rates increased 15 percent from the pandemic low point.

According to the most recent Housing Element of the City's General Plan (2023-2031), the City plans to add 46,000 new housing units affordable at low and moderate incomes by 2031. General Plan policies intend to promote building affordable housing, hiring more staff to speed along permitting for new construction, and exploring affordable housing incentives for developers.

Sources: 2, 3, 4, 5

Funding Information

Grant Number	HUD Program	Funding Amount
B-21-MC-06-0016	CDBG	\$11,380,000

Estimated Total HUD Funded Amount: \$11,380,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$109,828,721

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The nearest civil airports to the project site are the San Francisco International Airport and the Oakland International Airport. The San Francisco International Airport is located approximately 9.4 miles south of the project site, and the Oakland International Airport is located approximately 8.8 miles southeast of the project site. There are no military airfields within 15,000 feet of the project site. The project site is not located within the Airport Influence Area, Runway Potential Zone/Clear Zone, or Accident Potential Zone for either the San Francisco International Airport or the Oakland International Airport. Thus, the proposed action would not result in a significant airport-related safety hazard. Source List: 6, 7
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Coastal Barrier Resources Act of the United States (CBRA, Public Law 97-348), enacted on October 18, 1982, designated various undeveloped coastal barriers, depicted by a set of maps adopted by law, for inclusion in the John H. Chafee Coastal Barrier Resources System (CBRS). Designated areas were made ineligible for direct or indirect federal national security, navigability, and energy exploration. CBRS areas extend along the coasts of the Atlantic Ocean and the Gulf of Mexico, Puerto Rico, the US Virgin Islands, and the Great Lakes and consist of 857 units. No designated coastal barrier areas exist on the west coast and in California; therefore, the project site is not located in a coastal barrier area and would not conflict with the Coastal Barrier Resources Act. Source List: 8
Flood Insurance	Yes No	The project would involve the construction of 120 residential units within a new multi-story apartment

<p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>building. According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) #0602980119A (effective March 23, 2021), the project site is located within Zone X, an area of minimal flood hazard. Thus, the project site is not located in a FEMA-designated Special Flood Hazard Area. The proposed action would not conflict with the Flood Disaster Protection Act or National Flood Insurance Reform Act.</p> <p>Source List: 9, Attachment A</p>
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STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The federal Clean Air Act (CAA) requires each state to identify areas that have ambient air quality in violation of federal standards. An area's compliance with federal ambient air quality standards is categorized as nonattainment, attainment (better than national standards), unclassifiable, or attainment/cannot be classified. The unclassified designation includes attainment areas that comply with federal standards, as well as areas for which monitoring data are lacking. Unclassified areas are treated as attainment areas for most regulatory purposes. Simple attainment designations generally are used only for areas that transition from nonattainment status to attainment status. Areas that have been reclassified from nonattainment to attainment of federal air quality standards are automatically considered maintenance areas, although this designation is seldom noted in status listings. The San Francisco Bay Area is designated as nonattainment-marginal for the federal 8-hour ozone standard and nonattainment-moderate for particulate matter less than 2.5 microns in diameter (PM2.5). The Bay Area is designated as attainment or unclassified for the other federal ambient air quality standards.</p> <p>States are required to develop, adopt, and implement a State Implementation Plan (SIP) to achieve, maintain, and enforce federal ambient air quality standards in nonattainment areas. SIP elements are developed on a pollutant-by-pollutant basis whenever one or more air quality standards are being violated. In California, local and regional air pollution control agencies have primary responsibility for developing SIPs, generally in coordination with local and regional land use and transportation planning agencies. The California Air Resources Board (CARB) is the state agency responsible for regulating air quality. CARB's responsibilities include establishing state ambient air quality standards, emissions standards, and regulations for mobile emissions sources (e.g., autos and trucks), as well as overseeing the efforts of countywide and</p>
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		<p>multi-county air pollution control districts, which have primary responsibility over stationary sources.</p> <p>The Bay Area Air Quality Management District (BAAQMD) is the responsible regional air pollution control agency in the San Francisco Bay Area. The ozone SIP for the Bay Area was initially prepared in 1991 and was amended in 1999 and 2001. Since the 2001 SIP was prepared, the United States Environmental Protection Agency (USEPA) has revoked the 1-hour ozone standard and established the new 8-hour standard. State-mandated clean air plans were developed by BAAQMD in 1994, 1997, 2000, 2005, 2010, and 2017.</p> <p>With respect to ambient air quality standards, California classifies areas of the state as attainment, nonattainment, nonattainment-transitional, or unclassified. The Bay Area is designated as nonattainment for the state standards for ozone, particulate matter less than 10 microns in diameter (PM₁₀) and PM_{2.5} and as attainment or unclassified for the other state ambient air quality standards.</p> <p><i>Construction and Operational Emissions</i></p> <p>CAA conformity thresholds applicable in the San Francisco Bay Area are 100 tons per year of ozone, 100 tons per year of PM_{2.5}, and 100 tons per year of CO (40 CFR §93.153).</p> <p>For construction activities, the San Francisco Dust Control Ordinance (Ordinance 176-08) would reduce the quantity of dust generated by site preparation, demolition, and construction work in order to protect the health of the general public and on-site workers, minimize public nuisance complaints and avoid orders to stop work by the Department of Building Inspection. San Francisco Health Code Article 22B and San Francisco Building Code Section 106A.3.2.6 (collectively, the San Francisco Construction Dust Control Ordinance) require that all site preparation work, demolition, or other construction in San Francisco that could create dust or expose or disturb more than 10 cubic yards or 500 square feet of soil, comply with specified dust control measures.</p> <p>Construction activities on the project site would be required by the Ordinance (San Francisco Building Code Section 106A.3.2.6.3) to implement the following or equivalent measures acceptable to the Director of Public Health:</p> <ul style="list-style-type: none">• Watering construction areas to prevent dust from becoming airborne;• Providing as much water as necessary to control dust (without creating run-off) for dust generating activities;
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- Wet sweeping or vacuuming streets, sidewalks, paths and intersections where work is in progress at the end of each workday, covering inactive stockpiles of designated size;
- Covering any inactive stockpiles greater than ten cubic yards or 500 square feet of material with a 10 mil plastic tarp and brace it down or use other equivalent soil stabilization techniques; and
- Using dust enclosures, curtains and collectors, as necessary, to control dust in excavation areas.

The air pollutant emissions associated with the proposed action were calculated using the California Emissions Estimator Model (CalEEMod) version 2022.1.1.21 (see Attachment B for modeling results). The estimated construction-related and operational emissions for each pollutant for the proposed action are shown in the tables below.

Table 2: Construction Air Pollution Emissions

Pollutant	Maximum Construction Emissions (tpy)	
	CalEEMod Estimate	CAA Conformity Thresholds
Ozone ¹	1	100
PM _{2.5}	<1	100
CO	2	100

¹Highest of ozone precursors emissions (reactive organic gases or nitrogen oxides)
tpy = tons per year

Source: Attachment B

Table 3: Annual Operational Air Pollution Emissions

Pollutant	Maximum Operational Emissions (tpy)	
	CalEEMod Estimate	CAA Conformity Thresholds
Ozone ¹	14	100
PM _{2.5}	3	100
CO	2	100

¹Highest of ozone precursors emissions (reactive organic gases or nitrogen oxides)
tpy = tons per year

Source: Attachment B.

As shown in Table 2 and Table 3, development of the proposed action would not generate emissions exceeding CAA conformity thresholds.

Consistency with the CARB Land Use Advisory Recommendations and Compatibility of Project Related Land Uses

CARB's *Air Quality and Land Use Handbook, A Community Health Perspective*, provides land use advisory recommendations regarding proposed actions. The handbook recommends that new sensitive

uses not be sited within 500 feet of a freeway, due to higher exposure to diesel particulate matter (DPM) from motorized vehicles. The project site is located within 500 feet of the I-280 freeway and the Caltrain Express route. Additionally, six BAAQMD permitted stationary sources within 1,000 feet of the project site were identified. Therefore, the project could result in the exposure of new sensitive uses to DPM emissions. However, following implementation of Mitigation Measure AQ-1, this impact would be reduced such that the proposed action would not result in a substantial adverse effect. As discussed in the Air Quality and Greenhouse Gas Study (Attachment B), all potential DPM sources would not exceed the cancer risk, PM_{2.5}, or non-cancer risk at the project site following the implementation of Mitigation Measure AQ-1.

Mitigation Measure

AQ-1 Indoor Air Filtration

The mitigation actions listed below shall apply to all new residential units at the project:

- Forced air mechanical ventilation with fresh air filtration using filter screens on outside air intake ducts must be provided for all residential units proposed on the site. The filter screens must have a minimum efficiency reporting value (MERV) 13 rating per Title 24 requirements. Air intakes must be located on the side of the building facing away from Interstate 280 and windows facing Interstate 280 cannot be capable of opening unless warranted to comply with California Building Code requirements for emergency egress.
- For individual residential units with separate HVAC systems, a brochure notifying the future residents of the need for maintaining the filter screens and keeping windows closed to ensure adequate fresh air filtration must be prepared and provided at the time of lease signing. In addition, a notice of the diesel particulates risk hazard and the need for screen maintenance must be recorded in the property title and included with lease agreements.
- Install high efficiency ceiling fans.
- Windows and doors must be fully weatherproofed with caulking and weather-stripping that is rated to last at least 20 years.

Odors

Objectionable odors are typically associated with industrial uses such as agricultural facilities (e.g., farms and dairies), refineries, wastewater treatment facilities, and landfills. BAAQMD's *California Environmental Quality Act Air Quality Guidelines*

		<p>(Table 3-3) contains a list of land uses/types of operation associated with odors and residential land uses are not part of that list. Therefore, the project would not be expected to generate objectionable odors that would affect a substantial number of people.</p> <p>Source List: Attachment B</p>
<p>Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Coastal Zone Management Act of 1972 encourages coastal states to develop and implement coastal zone management plans. As identified by the California Coastal Commission, the project site is not located within the Coastal Zone or within a Coastal Zone Management (CZM) area. The project does not involve the acquisition of undeveloped land in a CZM area. There would be no conflict with the Coastal Zone Management Act.</p> <p>Source List: 10</p>
<p>Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Radon The Center for Disease Control and Prevention (CDC) “Radon Tests from States” data was reviewed to determine potential adverse effects from on-site exposure to high radon levels, in compliance with HUD’s Office of Community Planning and Development (CPD) guidance in Notice CPD-23-103 (Department Policy for Addressing Radon in the Environmental Review Process) issued January 11, 2024. The CDC “Radon Tests from States” data does not provide radon information for California. However, a review of the CDC “Radon Tests from Labs” data filtered to show the “Mean Pre-mitigation Radon Level in Tested Buildings over a 10-year Period” indicated a mean level of 1.0 picocuries per liter of air (pCi/L) for San Francisco County based on a test sample size greater than 10. (l) This meets HUD’s CPD guidance from Notice CPD-23-103, which states that analyses should use the latest 10 years of radon testing results for a project area to indicate radon levels below 4 pCi/L. Moreover, San Francisco County’s mean radon level of 1.0 pCi/L is also below the USEPA recommendation for mitigating residences with radon levels between 2 pCi/L and 4 pCi/L. Based on the available science-based data, the potential for future occupants to be exposed to elevated radon levels is low and further testing is not required.</p> <p>Hazardous Materials Regulatory Oversight Sites known to contain hazardous soils or groundwater conditions in San Francisco are governed by San Francisco Health Code Article 22A, also known as the Maher Ordinance, which is administered by the San Francisco Department of Public Health (SFDPH). The Maher Ordinance requires that SFDPH provide, “oversight for characterization and mitigation of hazardous substances in soil and groundwater in designated areas zoned for industrial uses, sites with</p>

industrial uses or underground storage tanks, sites with historic bay fill, sites in close proximity to freeways or underground storage tanks.” The site is currently located in a mapped Maher Area.

2023 Path Forward Partners Phase I ESA Summary

Path Forward Partners, Inc., conducted a Phase I Environmental Site Assessment (ESA) of the project site in February 2023. The Phase I ESA is included as Attachment C and is summarized in detail below.

The Phase I ESA revealed the following environmental conditions at the project site:

- The project site was entered into the Maher program in 2016 in support of planned Site redevelopment for residential use. In 2016, the SFDPH approved a Site Mitigation Plan and noted that a deed restriction may be required; however, subsequent review notes by the SFDPH in 2021 indicate that additional soil data may be needed, as some of the soils on the project site may require handling as hazardous waste.
- The project site is located within an ultramafic geologic unit and will be subject to the California Air Resources Board Asbestos Airborne Toxic Control Measure (ATCM) for construction and grading. Additional controls may be required during site work due to the nature of naturally occurring minerals (asbestos) in the project site’s subsurface.

As the project site’s subsurface has the potential for naturally occurring asbestos, construction workers may be exposed to asbestos during project ground-disturbing activities, and mitigation would be required.

The 2023 Phase I ESA reports the following documents were reviewed:

- 2014 Phase I ESA - John Carver Consulting [JCC]
- 2016 Maher Application - included as attachment to 2023 Phase I ESA
- 2016 Subsurface Investigation - JCC
- 2016 Site Mitigation Plan - JCC
- 2016 letter from SFDPH - included as attachment to 2023 Phase I ESA
- 2021 Phase I ESA - AEI Consultants

Review of the two documents included as attachments to the 2023 Phase I ESA are summarized below.

2016 Maher Application

The project site was entered into the Maher program in 2016. The application indicates that previous project site use was a hardware retail store/film studio and the project site was planned for the development of a new four-story multi-family residential and commercial

building with 59 total residential units. Additionally, documents submitted with the application include the following: Phase I ESA, Geotechnical Report, Plan and Elevation Drawings, and a work plan confirmation letter. These documents were not provided in the 2023 Path Forward Partners Phase I ESA.

2016 SFDPH Letter Summary

SFDPH cites review of an approval letter for a January 2016 Workplan for Subsurface Investigation (JCC), a March 2016 Subsurface Investigation (JCC), and a July 2016 Site Mitigation Plan (JCC) for the project site on July 20, 2016. These documents were not provided for review and are not available online at the DTSC EnviroStor website or the SWRCB GeoTracker website.

The approval letter indicates that development of a four-story mixed-use commercial and residential building was planned at the project site (as of July 2016). Based on the information provided by JCC and the site history, the San Francisco Department of Public Health, Site Assessment and Mitigation (DPH-SAM) recommended mitigation measures that would have been required during and after grading activities for the original mixed-use commercial and residential building. The mitigations measures recommended include dust control, soil handling, stockpiling and profiling, soil disposal, confirmation observations, identification of contingencies (should they occur), encapsulation, and documentation. The letter also states that a deed restriction may be required.

Mitigation Measures

Although SFDPH approved the 2016 Site Mitigation Plan for the project site, the site development plans have changed since July 2016. Therefore, the following mitigation measures have been developed to mitigate both construction impacts and the long-term environmental or health and safety risks caused by the presence of the identified hazardous materials on-site.

HAZ 1 – Naturally Occurring Asbestos.

As the project site is located within an ultramafic geologic unit and would be subject to the California Air Resources Board Asbestos Airborne Toxic Control Measure (ATCM) for construction and grading, the applicant shall notify the ATCM of the proposed project and provide the following information to the assigned Air Pollution Control Officer (APCO):

- Current development plan and any modifications to the development plan
- Geologic, asbestos, and subsurface investigation/assessment documents for the project site

Upon notification of the information above, the APCO could require actions such as: a geologic evaluation, testing for ultramafic rock and/or asbestos testing, implementation of dust mitigation measures, and/or preparation of an asbestos dust mitigation plan. Based on test results, the APCO may also require additional assessment and/or air monitoring and testing during grading and construction due to the nature of naturally occurring minerals (asbestos) at the project site.

The responsible entity, EHB-SAM, and APCO shall review and approve the required ATCM documents prior to demolition and grading (construction).

HAZ 2 - Regulatory Agency Involvement – SAM.

Because there is an open Cleanup Program case (San Francisco Department of Public Health, Environmental Health Branch [EHB] Site Assessment and Mitigation Program [SAM] case #1369) on the project site, EHB-SAM shall continue to be utilized for agency oversight of assessment and remediation within the project through completion of building demolition, subsurface demolition, and construction of facilities. Additionally, the applicant shall notify the EHB-SAM project manager of the following:

- Current development plan and any modifications to the development plan
- Unexpected underground features
- All former environmental documents completed for the project site.

Upon notification of the information above, EHB-SAM could require actions such as: development of subsurface investigation workplans; completion of soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. The project applicant shall retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to conduct additional assessment or remediation work as required by SAM.

If groundwater wells, soil vapor monitoring probes, or sub-slab vapor points are identified during demolition, subsurface demolition, or construction at the project site, they shall be abandoned/destroyed by a qualified environmental consultant under permit from the City and County of San Francisco, Department of Public Health – EHB. Demolition activities shall be documented in a letter report submitted to EHB-SAM within 60 days of the completion of abandonment activities.

It should also be noted that EHB-SAM may determine that San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) or California Department of Toxic Substances Control (DTSC) may be best suited to perform the lead agency duties for assessment and/or remediation at the project site. Should the lead agency be transferred to SFBRWQCB or DTSC, this and other mitigation measures shall still apply to these agencies.

HAZ 3 – Remediation.

If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE) to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary for the proposed development.

The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate for the proposed development.

The lead agency and EHB-SAM shall review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.

HAZ 4 – Site Mitigation Plan (SMP) for Impacted Soils.

When requested by EHB-SAM, the project applicant shall retain a qualified environmental consultant (PG or PE), to prepare a Site Mitigation Plan (SMP) prior to construction. The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan

		<p>shall establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:</p> <ul style="list-style-type: none"> • Stockpile management including stormwater pollution prevention and the installation of Best Management Practices (BMPs) • Proper disposal procedures of contaminated materials • Monitoring and reporting • A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. <p>The health and safety plan shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.</p> <p>The lead agency and EHB-SAM shall review and approve the development SMP for Impacted Soils prior to demolition and grading (construction).</p> <p>Source List: 11, 12, 13, Attachment C</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is located in a densely populated and urbanized area in San Francisco. The site is surrounded by an urban environment and generally lacks existing vegetation other than urban landscaping. Implementation of the proposed project would involve demolition of an existing structure and surface parking lot and construction of a new residential building on a previously disturbed and graded site. There are no endangered species, or species subject to the Endangered Species Act, occupying or migrating through the site. As identified by the United States Fish and Wildlife Service’s Information for Planning and Consultation tool, there is no critical habitat located on the project site. Therefore, the proposed action would have no effect on natural habitats or federally protected species, and would be consistent with the Endangered Species Act.</p> <p>In addition, the USFWS implements the Migratory Bird Treaty (MBTA) and the Bald and Golden Eagle Protection Act. Section 3503.5 of the Fish and Game Code of California specifically protects birds of prey, and their nests and eggs, against take, possession, or destruction. Section 3503 of the Fish and Game Code also incorporates restrictions imposed by the federal MBTA with respect to migratory birds.</p>

		<p>Migratory or other common nesting birds, while not designated as special-status species, are protected by the CFGC and may nest in trees located in Pennsylvania Garden, a small park south of the project site. If project construction occurs during the migratory bird nesting season (generally February 1 to September 15), noise associated with construction activities on the project site may cause nest failures. Mitigation Measure BIO-1 would ensure no violations of CFGC.</p> <p><i>Mitigation Measure</i></p> <p>BIO-1 Nesting Bird Pre-construction Surveys and Monitoring. Project construction occurring between February 1 to September 15 shall require a preconstruction nesting bird survey no more than 14 days prior to the start of ground disturbing activities. A qualified biologist shall survey accessible areas within 150 feet (for passerines) and 500 feet (for raptors) of construction for active nests. Should an active nest be identified, the qualified biologist shall establish an avoidance buffer based on the needs of the species identified and pursuant to consultation with CDFW, if necessary, prior to initiation of construction activities. Avoidance buffers shall remain in place until the end of the general nesting season or upon determination by the qualified biologist that young have fledged, or the nest has failed. Should ground disturbance commence later than 14 days from the survey date, an additional preconstruction survey shall be conducted prior to reinitiating work. Should work activity cease for 5 days or greater during the breeding season, surveys shall be repeated to ensure birds have not established nests during inactivity. If buffer zones are determined to be infeasible, a full-time qualified biological monitor shall be on site to monitor construction within the buffer zones to avoid impacts to active nests and nesting birds.</p> <p>Source List: 14</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The proposed residential uses on-site would not involve explosive or flammable materials or operations. Pursuant to 24 Code of Federal Regulations (CFR) Part 51 C, Appendix I, a HUD Explosive and Flammable Hazards review was completed to identify facilities in the vicinity of the project site having significant observed or reported Specific Hazardous Substances (Attachment D). As identified in the Explosive and Flammable Hazards review, 45 facilities operating above-ground storage tanks (ASTs) occur within one mile of the project site. Using available information, HUD’s Acceptable Separation Distance calculator was utilized to determine the minimum acceptable distance from these ASTs to the project site. The ASTs were determined to be located</p>

		beyond the minimum acceptable distances; therefore, no explosive hazards have been identified with these ASTs (Attachment D). Source List: Attachment D
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No protected farmlands are located within the City and County of San Francisco. The project site is zoned UMU (Urban Mixed Use) and is currently developed with a surface parking lot and vacant building. The proposed action would have no impact on farmlands. The proposed action would not conflict with the Farmland Protection Policy Act. Source List: 15
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to FEMA FIRM #0602980119A (effective March 23, 2021), the project site is located within Zone X, an area of minimal flood hazard. Therefore, the project site is not located within a Federal Emergency Management Agency (FEMA) designated 100-year floodplain or 500-year floodplain. The proposed action would not conflict with provisions related to floodplain management. Source List: 9, Attachment A
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<i>Prehistoric Context</i> During prehistoric times, the San Francisco Bay region was sparsely populated. The earliest peoples currently known to have inhabited the San Francisco Bay Area were small hunter-gather groups whose subsistence was based on large game, seeds, and nuts, as evidenced by the presence of large projectile points and milling stones found at nearby archaeological sites. These peoples lived in small nomadic bands that made less use of shoreline and wetlands resources than later prehistoric populations. The native people living around San Francisco Bay at the time that Europeans arrived spoke five distinct languages, including Costanoan (Ohlone). Costanoan, a member of the Utian language family, was spoken throughout the Santa Clara Valley and foothills and along much of the East Bay and the San Francisco Peninsula. The Costanoan people, known as the Yelamu, occupied the northern end of the San Francisco Peninsula in the late eighteenth century. The Yelamu were divided into three semi-sedentary village groups and were composed of at least five settlements (Chutchi, Sitlintac, Amuctac, Tubsinte, and Petlenuc) within present day San Francisco. Yelamu may have also been the name of an additional settlement within the vicinity of Mission Dolores. Sitlintac may have been located on the bay shore, near the large tidal wetlands of the Mission Creek estuary. Chutchi was located near the lake (Laguna de los Dolores) east of

		<p>the current Mission Dolores, two to three miles inland. These two villages were probably the seasonal settlements of one band of the Yelamu who used them alternately.</p> <p><i>Regulatory Context</i></p> <p><u>National Historic Preservation Act and National Register of Historic Places</u></p> <p>Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process seeks to accommodate historic preservation concerns with the needs of federal undertakings through consultation among the agency officials and other interested parties, beginning at the early stages of planning of the undertaking. The goals of consultation are to identify historic properties potentially affected by the proposed action, to assess its effects, and to seek ways to avoid, minimize, or mitigate adverse effects on historic properties. The term “cultural resources” includes historic properties (buildings, structures, districts, landscapes, archaeological sites, Traditional Cultural Properties [TCPs], districts, and objects that are eligible for listing or that are listed on the National Register of Historic Places [NRHP]); cultural items, as defined in the Native American Graves Protection and Repatriation Act of 1990; Native American, Native Alaskan, or Native Hawaiian sites for which access is protected under the American Indian Religious Freedom Act of 1978; archaeological resources, as defined by the Archaeological Resources Protection Act of 1979 and the Antiquities Act of 1906, that are not eligible for listing or are unevaluated for listing on the NRHP; and archaeological artifact collections and associated records, as defined by 36 CFR Part 79.</p> <p>To be eligible for listing on the NRHP, a cultural resource must meet specific criteria identified in 36 CFR Part 60 and explained in guidelines published by the Keeper of the National Register.¹ The significance of effects on cultural resources is also determined by using the criteria set forth in the regulations implementing Section 106 of the NHPA. NRHP criteria (36 CFR, 60.4) are as follows:</p> <ol style="list-style-type: none"> a. Association with events that have made a significant contribution to the broad patterns of our history; b. Association with the lives of persons significant to our past;
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¹The most widely accepted guidelines are contained in the US Department of Interior, National Park Service, “Guidelines for Applying the National Register Criteria for Evaluation,” *National Register Bulletin 15* (Washington DC: US Government Printing, 1991, revised 1995 through 2002).

		<p>c. Resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or</p> <p>d. Resources that have yielded or may be likely to yield information important in prehistory or history.</p> <p>In addition to historic significance, a property must have integrity to be eligible for the NRHP. This is the property's ability to convey its demonstrated historical significance through location, design, setting, materials, workmanship, feeling, and association.</p> <p><i>Programmatic Agreement (PA) by and among the City and County of San Francisco, the California State Historic Preservation Officer, and the Advisory Council on Historic Preservation</i></p> <p>The discussion of cultural resources is guided by an existing Programmatic Agreement (PA) between the City and County of San Francisco (City) and the California State Historic Preservation Officer (SHPO) pursuant to Section 106 of the National Historic Preservation Act (16 USC §470f) and its implementing regulations at 36 CFR Part 800.14.2. The PA establishes the City's Section 106 responsibilities for the administration of undertakings subject to regulation by 24 CFR Part 58 which may have an effect on historic properties. The City is required to comply with the stipulations set forth in the PA for all undertakings that (1) are assisted in whole or in part by revenues from U.S. Department of Housing and Urban Development (HUD) Programs subject to 24 CFR Part 58 and that (2) can result in changes in the character or use of any historic properties that are located in an undertaking's Area of Potential Effects (APE). The proposed action is subject to the Stipulations of the PA.</p> <p><i>AREA OF POTENTIAL EFFECTS (Stipulation VI of the PA)</i></p> <p>Compliance with Section 106 requires the City to evaluate the effect of an Undertaking on historic properties within the APE that are eligible for listing in the NRHP. The City identified the APE for architectural resources, in accordance with 36 CFR</p>
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		<p>§800.16(d) to include the project site itself and four surrounding properties:</p> <ol style="list-style-type: none"> 1) 249 Pennsylvania Avenue (project site); 2) 1000 Mariposa Street 3) Bayshore Cutoff 4) 260 Pennsylvania Avenue 5) 268-270 Pennsylvania Avenue <p>For this project, the APE encompasses the area in which the undertaking may directly cause change (i.e., the project site itself) and where it may indirectly cause alterations in the character of historic properties (i.e., on surrounding properties).</p> <p><i>IDENTIFICATION AND EVALUATION OF HISTORIC PROPERTIES (Stipulation VII of the PA)</i></p> <p>Under Stipulation VII, Paragraph D, the City shall evaluate all properties that may be affected by an Undertaking using the National Register Criteria set forth in 36 CFR Section 60.4 and documented by the City on State of California Historic Resources Inventory Form – DPR 523. Stipulation VII.D.1 requires the City to submit determinations of eligibility to the SHPO. If the SHPO concurs in the determinations of eligibility, the properties are considered Historic Properties.</p> <p>In accordance with Stipulation VII of the PA, the Planning Department of the City reviewed all existing information on all properties within the architectural APE for eligibility for listing in the National Register of Historic Places. This process involved a review of any existing State of California Historic Resources Inventory Forms (known as DPR 523 forms) for properties within the undertaking’s APE. The MOHCD retained Rincon to prepare the DPR 523 forms for properties that had not been evaluated for listing in the NRHP (See Attachment E).</p> <p><i>249 Pennsylvania Avenue (project site):</i> The San Francisco Planning Department determined the property is ineligible for listing in the NRHP. This property is exempt from further building analysis due to previous historic survey findings and subsequent building demolition.</p> <p><i>1000 Mariposa Street:</i> The San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The building at 1000 Mariposa Street was constructed in 1947 as an industrial warehouse building. Built near the northern foot of Potrero Hill, this building was constructed on a corner lot with a rail spur passing behind its west façade, in an area of mixed industrial and residential uses. The building was occupied between the late 1940s and late 1960s by a pest control company and transitioned to use as a printing facility in the early 1980s, before it</p>
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		<p>was more recently adapted to industrial-office and commercial-retail uses in the 2000s. Research did not find information indicating that this property's development was individually significant or otherwise contributory to the significance of development in this area of San Francisco, or to broader patterns of industry and commerce. Therefore, this property is not associated with historic context in an important way (Criterion A). Archival research failed to indicate that any individuals with a documented association with the property were important to history (Criterion B). The property at 1000 Mariposa Street contains common features of industrial buildings in the region and has no individually distinctive features that are representative of an identified style or architectural trend in an individually significant way (Criterion C). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).</p> <p><i>Bayshore Cutoff Tunnel No. 1:</i> Bayshore Cutoff Tunnel No.1 is one of five original tunnels constructed by the Southern Pacific Company between San Francisco and San Bruno between 1904 and 1907. The tunnels were built as part of the Bayshore Cutoff project, which enabled Southern Pacific to route longer commuter trains southward along the San Francisco Peninsula on a moderate grade that avoided steep topography of the San Bruno mountains. Bayshore Cutoff Tunnels No. 1, 2, 3, and 4 were first evaluated for eligibility to the NRHP by both JRP Historical Consulting, LLC (JRP) and the San Francisco Planning Department in 2002. Overall, Tunnel No. 1 – among the four previously evaluated Bayshore Cutoff tunnels, is currently considered eligible for listing in the NRHP as a contributor to the eligible Central Waterfront District under Criteria A and C. The tunnel's period of significance under these criteria is 1905-1948, corresponding to its year of completion and the end year of the eligible Central Waterfront District's period of significance. No substantial changes have occurred to the tunnel since its past evaluation. Due to substantial changes to the interior structure of the tunnel (installation of concrete, steel reinforcement framing, and shotcrete) Tunnel No. 1 does not retain a high degree of historic materiality at its interior, which results in diminished evidence of its original construction methods. Additionally, extensive change – most notably the construction of the I-280 Viaduct over the tunnel in the late 1960s – and development in the immediate vicinity has impaired the tunnel's integrity of setting, such that it does not have a substantial presence within its urban context as it originally had. These factors reduce the tunnel's historic integrity such that it is not individually eligible for the NRHP.</p>
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		<p><i>260 Pennsylvania Avenue:</i> San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The residential building at 260 Pennsylvania Avenue was constructed in 1965, along with the neighboring building at 268-270 Pennsylvania Avenue. 260 Pennsylvania Avenue's construction occurred during a period of continued post-World War II residential construction in San Francisco, as many housing tracts were built out in the city's western neighborhoods, along with infill in other areas. Research found no evidence that this property is individually significant within the context of residential development in the city, or to broader patterns to history in California or the nation. Therefore, this property is not associated with historic context in an important way (Criterion A). Archival research failed to indicate that any individuals with a documented association with the property were important to history (Criterion B). Regarding the building's design merit, 268-270 Pennsylvania Avenue is generally similar to Contractor Modern style residential buildings that were built in high numbers across San Francisco during the Modern era. The typology is identified in the San Francisco Modern Architecture and Landscape Design, 1935-1970 Historic Context Statement, which notes that these buildings are typically not eligible under Criterion C (Architecture/Design). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).</p> <p><i>268-270 Pennsylvania Avenue:</i> The San Francisco Planning Department determined the property is ineligible for listing in the NRHP. The residential building at 268-270 Pennsylvania Avenue was constructed in 1965, along with the neighboring building at 260 Pennsylvania Avenue. 268-270 Pennsylvania Avenue's construction occurred during a period of continued post-World War II residential construction in San Francisco, as many housing tracts were built out in the city's western neighborhoods, along with infill in other areas. Research found no evidence that this property is individually significant within the context of residential development in the city, or to broader patterns to history in California or the nation. Therefore, this property is not associated with historic context in an important way (Criterion A). Archival research failed to indicate that any individuals with a documented association with the property were important to history (Criterion B). Regarding the building's design merit, 268-270 Pennsylvania Avenue is generally similar to Contractor Modern style residential buildings that were built in high numbers across San Francisco during the Modern era. The typology is identified in the San Francisco Modern Architecture and Landscape Design, 1935-1970</p>
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	<p>Historic Context Statement, which notes that these buildings are typically not eligible under Criterion C (Architecture/Design). It is unlikely that it has potential to yield information important to our history or prehistory (Criterion D).</p> <p><i>TREATMENT OF HISTORIC PROPERTIES (STIPULATION VIII of the PA)</i></p> <p>Paragraph F of Stipulation VIII of the PA (New Construction) requires the City to ensure that the design of any new construction is compatible with the historic qualities of the Historic Property, of any historic district or of adjacent historic buildings in terms of size, scale, massing, color, features, and materials and that the design is responsive to the recommended approaches for new construction set forth in the Standards.</p> <p>There are no individual historic structures located on the project site. As discussed above, the architectural APE includes four structures, all of which were determined ineligible for listing in the NRHP. The Planning Department has determined that the undertaking would have no adverse effect on historic properties (see Attachment E).</p> <p><i>CONSIDERATION AND TREATMENT OF ARCHAEOLOGICAL RESOURCES (STIPULATION XI OF PA)</i></p> <p>As the responsible agency under the NHPA, MOHCD has determined the APE for archaeological resources based on guidelines contained in the Advisory Council on Historic Preservation's Section 106 Archaeology Guidance. The APE is inclusive of surface and subsurface areas that may be disturbed because of the Proposed Action and alternatives.</p> <p>In accordance with Stipulation XI.B of the PA, the City requested that the Northwest Information Center (IC) conduct a records search for the undertaking's APE. The records search, conducted on November 27, 2023, indicated that one previous cultural resource study has been prepared that covers the project area (see Attachment E). The records search of ethnographic literature revealed no Native American resources in the vicinity of the project site.</p> <p>The IC's review of historical literature and maps indicated a moderate potential for unrecorded Native American resources in the project area. The review also indicated a low potential for unrecorded historic-period archaeological resources in the project area. Because there is a moderate potential for Native American archeological resources, the IC recommended that prior to ground disturbance, a qualified archaeologist conduct further archival and field study to identify archaeological resources,</p>
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	<p>including a good faith effort to identify archaeological deposits that may show no indications on the surface.</p> <p>In accordance with Stipulation XI.D that if the IC recommends such actions, the City must promptly furnish the SHPO with a copy of the IC's response and request the comments of the SHPO. On February 13, 2024, the City requested the SHPO's comments. On February 15, 2024, SHPO concurred with the IC's recommendation that a professionally qualified archaeologist conduct further archival research and field study to identify cultural resources. Following concurrence, MOHCD and the SHPO determined the appropriate path forward is a standard mitigation measures agreement (SMMA) that includes the IC's recommendation and additional measures to reduce potential adverse effects to buried resources.</p> <p>Based on the reasonable presumption that archaeological resources may be present within the project site, MOHCD and the SHPO executed a SMMA on May 2, 2024, that outlines the procedures and methodology that MOHCD will use to avoid any potentially significant adverse effect from the proposed project on potential buried historic properties. The Agreement is included in Attachment E.</p> <p><i>Native American Resources</i></p> <p>As the NWIC found a moderate potential for buried unrecorded Native American resources in the project area, the NWIC recommended the lead agency contact local Native American tribe(s).</p> <p>The Native American Heritage Commission was contacted on January 24, 20224, to request a record search of the sacred land file. The search failed to indicate the presence of Native American cultural resources in the project APE.</p> <p>As recommended by the Native American Heritage Commission, the City contacted representatives of Native American tribes in the Bay Area in February 2024 and April 2024 and asked for them to provide any information they may have on the site. No representatives of Native American tribes have responded to the City with concerns regarding the proposed action or requesting consultation.</p> <p><i>Impacts</i></p> <p><i>Archaeological Resources</i></p> <p>Based on a moderate potential for Native American archaeological resources to be within the project site, ground-disturbing activity during construction of the project could adversely affect such resources. To avoid any potentially significant adverse effect from the project on buried or submerged historic resources, the</p>
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		<p>MOHCD executed an SMMA with the SHPO (included in Attachment E). With implementation of this SMMA, the proposed action would resolve the potential for substantial adverse effects on archaeological resources.</p> <p><u>Architectural Resources</u></p> <p>The proposed undertaking would not result in adverse effects on historical architectural resources because the project site does not contain architectural historic properties. Construction activities would be limited to the project site. The Planning Department has determined that the undertaking would have no adverse effect upon historic properties.</p> <p>Compliance Steps</p> <p>The project would be required to comply with the terms of the Agreement Between the City and County of San Francisco and the California State Historic Preservation Officer Regarding 249 Pennsylvania Ave Mixed Use Project, San Francisco, California, May 2, 2024.</p> <p>Source List: Attachment E</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Construction Noise</p> <p>The project site and surrounding area is comprised of commercial, mixed-use, and residential land uses. The sensitive receptors nearest to the project site are residences approximately 90 feet west of the project site boundary. Construction on the project site could generate temporarily adverse noise audible to existing receptors and residences. Temporary noise generated by construction equipment would require mitigation, as described below.</p> <p><u>Mitigation Measure</u></p> <p>NOI-1 Construction Noise Reduction.</p> <p>Construction activity will be limited to the period between 7:00 a.m. and 6:00 p.m. on weekdays and to the period 7:00 a.m. to 5:00 p.m. on weekends. Construction outside of these hours will require a permit from the City. Furthermore, construction contractors for development on the project site shall implement appropriate noise reduction measures, as determined by the City during the construction permit approval process. Required noise reduction measures shall be subject to San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) and may include but are not limited to:</p> <ul style="list-style-type: none"> - Maintaining proper mufflers on equipment; - Relocating equipment away from noise-sensitive receptors where possible; and - Shutting off idling equipment.

Community Noise

Potential adverse effects from community noise that could reasonably result from the proposed development on the project site are analyzed herein.

The primary source of noise in the project site vicinity is vehicular traffic on I-280 and associated entrance and exit ramps, Pennsylvania Avenue, and Mariposa Street. To characterize ambient noise levels on-site, Rincon Consultants conducted three short-term (15-minute) and two long-term (24-hour) sound level measurements on January 25 and 26, 2024 (see Attachment F). Table 4 shows the average measured noise levels (the L_{eq}).

Table 4: Noise Measurement Results

Measurement Location	Primary Noise Source	L_{eq} (dBA)
Northern edge of project site	Mariposa Street	69.3
Northwestern corner of project site	Pennsylvania Avenue	67.8
Southeastern corner of project site	I-280	73.1

Source: Attachment F.

As shown in Table 4, the ambient noise levels at the project site ranged between 67.8 to 73.1 dBA L_{eq} . The long-term 24-hour noise measurements resulted in noise levels of 73 and 74 dBA L_{dn} , respectively. According to HUD site acceptability standards, exterior noise in the 65-75 dB Ldn range is normally unacceptable for residences and requires attenuation measures.

For comparison with noise measurements on-site, the HUD Site DNL Calculator was run to estimate the traffic-related Day/Night Noise Level (DNL), which is equivalent to L_{dn} (see Attachment F). Estimated average annual daily traffic (AADT) was entered into the DNL calculator, using numbers published by the San Francisco Municipal Transportation Agency and California Department of Transportation. Traffic noise from Pennsylvania Avenue, Mariposa Street, 18th Avenue, and I-280, which were observed to be the primary sources of traffic noise during peak hours, were incorporated into the DNL Calculator.

The DNL Calculator estimated that noise levels from nearby traffic upon all future building elevations, including ten years into the future, would exceed 65 dBA L_{dn} (Attachment F). These noise levels fall within HUD's unacceptable range.

In addition, noise levels in the ground-level open space courtyard to the west of the building would exceed 65

		<p>dBA DNL. However, as discussed via telephone between MOHCD and HUD on April 12, 2024 (referenced as Source 41), this outdoor courtyard is not considered a noise-sensitive use under HUD guidance. As a result, MOHCD, as the Responsible Entity, is pursuing a noise waiver for the proposed action, pursuant to 24 CFR 51.104(b)(2) (Attachment G). HUD approval of projects in the normally unacceptable range requires noise mitigation, usually in the form of building designs that provide more than typical noise attenuation. The goal is to reduce interior noise levels to an L_{dn} of 45 dBA inside residential units. This is the same as the California state noise insulation standards for multifamily development. Therefore, noise-reducing measures would be required for residential building design, as described below.</p> <p><i>Mitigation Measure</i></p> <p>NOI-2 Noise-Reducing Building Design.</p> <p>In order to reduce exterior noise levels to HUD's required interior limit of 45 dBA DNL within all living units, the following noise attenuation measures shall be implemented:</p> <ul style="list-style-type: none">- Provide mechanical ventilation so that windows may be left closed by occupants. This can be achieved passively with z-ducts, fresh air ducts, or an approved equal.- Exterior wall, window, and private balcony/patio doors must meet the minimum Sound Transmission Class (STC) ratings, defined as 46 STC for exterior walls, 32 STC for floors 2 through 7 on the north building elevation; 30 STC for floors 8 and 9 on the north building elevation and floors 2 through 9 on the south and west building elevations; 34 STC for floors 2 through 9 on the east building elevation; 35 STC for private balcony/patio doors on the north, east, and south building elevations; and 29 STC for private balcony/patio doors on the west building elevation.- Use permanently nonhardening sealant around perimeters of window frames.- Window assemblies shall be constructed with effective nonporous gaskets or weatherstripping to minimize air infiltration and sound leakage.- Provide airtight construction at all exterior walls with acoustical or other nonhardening sealant at floor plates.- Use door jam and head gasketing and door bottom gasketing at entry doors to seal the solid core doors against weather and sound.- All entry doors shall be insulated against weather and sound with nonporous seals.
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		<p>Caulk entry door thresholds as they are placed.</p> <p>Implementation of the above noise attenuation measures would ensure that interior noise levels within the proposed project's living units would be maintained at approximately 44 dBA DNL and below, thus complying with HUD's interior noise limit of 45 dBA DNL. Pursuant to HUD requirements, prior to the issuance of a construction permit, the project applicant shall be required to submit the window and door schedule (with STC ratings) to the Certifying Officer for review and approval.</p> <p>Source List: 41, Attachment F, Attachment G</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The nearest sole source aquifer is the Santa Margarita Aquifer, located approximately 46 miles south of the project site. Since the project site is not served by a USEPA-designated sole-source aquifer, the proposed action would have no effect on a sole-source aquifer subject to the HUD-USEPA Memorandum of Understanding.</p> <p>Source List: 16</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no wetlands on the project site. The nearest wetland to the project site is the San Francisco Bay, approximately 0.4 mile to the east, and identified as an estuarine and marine deepwater wetland. The proposed action would have no impact on wetlands or other waters of the state.</p> <p>Source List: 17</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The nearest designated Wild and Scenic River is a 23-mile segment of the American River, which is located over 75 miles northeast of the project site. The project would not affect a wild and scenic river and implementation of the project would not conflict with the provisions of the Wild and Scenic Rivers Act.</p> <p>Source List: 18</p>
ENVIRONMENTAL JUSTICE		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>In 2022, 38 percent of the City/County was white, 35 percent was Asian, 15 percent was Hispanic or Latino, 5 percent was Black or African American, 6 percent was two or more races, less than 1 percent was Native Hawaiian and Other Pacific Islander, less than 1 percent was American Indian and Alaska Native, and less than 1 percent was some other race. This represents a smaller percentage of environmental justice populations than exists nationwide.</p> <p>The project site is within U.S. Census Tract 227.02. In 2022, 54 percent of Census Tract 227.02 was white, 19 percent was Asian, 15 percent was Hispanic or Latino, 8 percent was two or more races, 3 percent was some</p>

	<p>other race, and 1 percent was Black or African American. This represents a lower percentage of environmental justice populations than exists in the City/County.</p> <p>Within Census Tract 227.02, 9.4 percent of people were living below the poverty line in 2022, compared to the citywide average of 10.5 percent. In Census Tract 227,02, 13.0 percent of seniors (aged 65 and over) were living below the poverty line, compared to the citywide average of 15 percent. The proposed action would provide 120 new housing units. Residential supportive services would be provided, including a common/community room with kitchen, laundry room, and a supply room. In addition, common space would be provided in the form of a southern garden, courtyard, and rain garden nook.</p> <p>As discussed above under <i>Clean Air</i>, residents on the project site would not be exposed to substantial health risks related to cancer, acute and chronic hazards, or particulate matter. As discussed throughout this Environmental Assessment, the proposed action would result in no substantial adverse environmental effects, therefore the project would not result in disproportionately high and adverse effects on minority and low-income populations. The proposed action would create new affordable housing opportunities in the City and not create environmental justice concerns. The proposed action would be consistent with Executive Order 12898.</p> <p>Source List: 19</p>
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The project site is located in the Potrero Hill neighborhood of the City of San Francisco. The site is located in an area primarily comprised of mixed-use and residential land uses, and is zoned Urban Mixed Use (UMU). UMU zones are located to the west and south of the site. Land uses to the north are zoned Mission Bay Redevelopment, land uses to the southwest are zoned Residential-House, Two Family, and land uses to the east (U.S. 280) are zoned Public.</p> <p><u>Land Use and Zoning</u> <i>Permitted Land Uses</i></p> <p>The project site is currently zoned UMU under the San Francisco Planning Code. According to Section 838 of the Planning Code, the UMU Zoning District is intended to promote a vibrant mix of uses while maintaining the characteristics of this formerly industrially zoned area. Within the UMU Zoning District, housing is permitted but subject to higher affordability requirements. The proposed action would provide 100 percent affordable housing and would be consistent with allowable land uses in the UMU zone.</p> <p><i>Height and Bulk Designation</i></p> <p>Under current zoning, the project site's capacity is limited by its Height and Bulk designation, UMU 40-X, which caps the maximum allowable height at 40 feet. However, the project would comply with AB 1763, which would allow for an additional three stories and form-based density. Allowances under AB 1763 would permit the project to be constructed at its proposed height of 123 feet, and under this allowance, the project would comply with permitted dwelling unit density.</p> <p><i>Rear Yard Setback</i></p> <p>The UMU zone requires a rear yard depth equal to 25 percent of the total depth of the lot on which the building is situated, but in no case less than 15 feet. The total lot size is 21,625 square feet, and the proposed rear yard would be 5,638 square feet. Therefore, the proposed rear yard would be greater than 25 percent of the total lot, and the project would comply with UMU rear yard setback requirements.</p> <p><u>Conformance with Plans</u></p> <p>The project site is located within the Showplace Square/Potrero Area Plan. Goals within the Showplace Square/Potrero Area Plan include stabilizing the area as a place for living and working and strengthening the area as a residential, mixed-use neighborhood. Specific objectives within the Showplace Square/Potrero Area Plan include improving affordable housing opportunities (Objective 2.2), targeting the provision of affordable housing for families (Policy 2.3.1), prioritizing the development of affordable family housing along</p>

		<p>transit corridors (Policy 2.3.2), and encouraging the creation of family supportive services, such as parks and recreation, in affordable housing developments (Policy 2.3.4). The project would provide 120 affordable housing units, of which 50 percent would offer two or more bedrooms. The project would also provide residential supportive services, such as a common/community room, southern garden, courtyard, and rain garden nook. Therefore, the project would be consistent with the goals and policies of the Showplace Square/Potrero Area Plan.</p> <p><u>Visual Consistency</u></p> <p>The project site is located at the southeastern corner of the intersection of Pennsylvania Avenue and Mariposa Street. The proposed project's design would be generally consistent with surrounding development and would be built with contemporary design and sustainable materials. The contemporary design of the proposed nine-story building would be compatible with the varying sizes of buildings in the greater Potrero Hill neighborhood, which includes a variety of styles and periods of architecture.</p> <p>The proposed building's nine-story height would be taller than those immediately surrounding the site, but not out of place with the intermittent two-to-five story structures in the vicinity and larger buildings located at the University of California, San Francisco, to the east. Therefore, the building's scale would be generally consistent with ongoing intensification of building massing on main arterial roadways throughout San Francisco.</p> <p>The project would also be required to comply with the City of San Francisco's General Plan Urban Design Guidelines. The project would have a compatible color palette and design style as development in the surrounding area. The provision of multiple open space areas (including a courtyard, southern garden, and rain garden nook) would increase the greenery on the project site as compared to existing conditions. Therefore, in the context of the redeveloping Potrero Hill neighborhood, the proposed action would not result in substantial adverse effects related to scale, visual quality, and urban design.</p> <p>Source List: 4, 20, 21, 22</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>The project site is entirely comprised of urban land, according to the U.S. Department of Agriculture's Web Soil Survey. Soils adjacent to the project site have proven sufficiently stable to support existing urban development.</p> <p>The project site is currently not subject to erosion, as it is fully paved and/or built upon; however, erosion may occur during construction. Development on the project site would be subject to the permitting requirement of the San Francisco Department of Building Inspection (DBI) to ensure compliance with applicable laws and regulations. As part of this permitting process, DBI would review the final building plans and require conformance with the provisions of the applicable federal, state, county, and City of San Francisco laws and ordinances.</p> <p>The project site is relatively flat and is currently developed with asphalt and an existing structure. The proposed project would not have potential hazards related to slope failure and would not create new</p>

		<p>slopes. Furthermore, the site is not in an erosion-sensitive area (near water, a drainage feature, or on a steep slope). The project site would continue to be fully covered with impervious surfaces, with minimal cutouts for proposed landscaping features. During construction and operation, the project applicant would be required to comply with all applicable federal and local water quality and wastewater discharge requirements that include compliance with Article 4.1 of the San Francisco Public Works Code, which incorporates and implements the City's National Pollutant Discharge Elimination System (NPDES) permit, and the nine minimum controls of the federal Combined Sewer Overflow Control Policy. The minimum controls include development and implementation of a pollution prevention program and an erosion and sediment control plan that would be reviewed and approved by the City and County of San Francisco prior to implementation.</p> <p>The project site is located in the Visitacion Valley-Frontal San Francisco Bay Estuaries watershed. As of 2022, six waterbodies (Candlestick Point, Central Basin, Crissy Field Beach, Islais Creek, Mission Creek, and the San Francisco Bay) within the watershed have been listed as "Impaired" with bacteria and other microbe pollutants.</p> <p>Stormwater runoff from the project site is affected by topography, drainage, and surface cover. The project site is relatively flat and stormwater runoff from the site would enter the City's combined sewer and wastewater system. Prior to stormwater runoff from the proposed building leaving the site, it would be filtered by on-grade landscaping planters and capture systems. With implementation of these stormwater capture systems, development of the site would not result in substantial new sources of off-site stormwater pollution. Removal of the existing parking lot would reduce stormwater pollution from petroleum-based hydrocarbons that can leak from motor vehicles, as well as other trash and other particulates. The project applicant would be required to comply with all aspects of the federal Combined Sewer Overflow Control Policy, and appropriate pre-treatment and pollution prevention programs, which would ensure consistency with existing water quality regulations protecting San Francisco Bay and ocean water quality.</p> <p>Source List: 23, 24</p>
<p>Hazards and Nuisances including Site Safety and Noise</p>	<p>2</p>	<p><i>Site Safety</i></p> <p>Development of the project site with residential uses would not create a risk of natural hazards, explosion, release of hazardous substances, or other dangers to public health. The project site is located in an urban setting and development on the site would be compatible with surrounding uses. Although soil contamination exists on-site, the implementation of mitigation measures are required, detailing site-specific procedures to be followed for site remediation which would prevent safety hazards for construction workers and future occupants on-site (see <i>Contamination and Toxic Substances</i>).</p> <p>On-site construction would be required to comply with the requirements of the latest California Building Code, which includes compliance with earthquake standards and fire codes and regulations. Therefore, the proposed action would not have a substantive adverse effect on site safety.</p> <p><i>Construction Noise</i></p>

		<p>As detailed above under <i>Statutes, Executive Orders, and Regulations Listed at 24 CFR 50.4 & 58.5, Noise Abatement and Control</i>, construction on the project site could generate temporarily adverse noise audible to existing residences in the area. Temporary noise generated by construction equipment would require mitigation to limit the hours of construction activity, as described above.</p> <p><i>Community Noise</i></p> <p>As detailed above under heading <i>Statutes, Executive Orders, and Regulations Listed at 24 CFR 50.4 & 58.5, Noise Abatement and Control</i>, the proposed action would place new residential units in an area subject to “unacceptable” noise levels for residential uses. Pursuant to mitigation listed above, development on-site would be required to use building façade materials, acoustic insulation in building walls and ceilings, acoustically rated windows, and similar measures to achieve sufficient reductions from outdoor L_{dn} levels such that building interior L_{dn} noise levels would be 45 dBA or less in the residential portions of project.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	<p>Construction of the proposed residential building would not displace existing residents or employees, as the on-site structure is currently vacant. Construction would provide temporary construction work during the length of construction. In addition, the proposed project would include employment opportunities for on-site management, janitorial services, and resident care. Therefore, the proposed action would have a net beneficial effect on employment and income patterns.</p>
Demographic Character Changes, Displacement	2	<p><i>Demographic Character Changes</i></p> <p>As of January 1, 2023, the total population in the City of San Francisco is 831,703 residents, with a total of 418,139 housing units. The proposed action would result in the establishment of 120 residential units on the project site. The number of anticipated occupants is currently not known at this time; however, based on the development of 120 units and using the City’s average rate of 2.11 persons per household (as identified by the California Department of Finance), it is conservatively assumed the project would provide housing for 253 persons. Therefore, implementation of the project could increase the population of San Francisco by approximately 0.03 percent. Based on regional projections provided by the Association of Bay Area Governments, the number of households of San Francisco is expected to increase to 578,000 units by 2050. The increase in housing resulting from the project would be nominal—approximately 0.07 percent of the forecasted regional increase.</p> <p><i>Displacement</i></p> <p>The project site is currently a vacant building with a surface parking lot. The project is a residential project intended to improve affordable housing opportunities. The increase in available housing for low income residents would result in a net positive impact to housing.</p>

		Therefore, the project would not result in substantial adverse impacts from displacement of people or businesses. Source List: 25, 26
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Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>The San Francisco Unified School District (SFUSD) provides public primary and secondary education in San Francisco. The district is composed of a total of 132 schools, including 13 early education schools, 64 elementary schools (Grades TK–5), eight alternatively configured elementary through middle schools (Grades TK–8), six County and Court schools, 13 middle schools (Grades 6–8), three continuation alternative schools, 14 high schools (Grades 9–12), and eleven charter schools. Total enrollment in SFUSD schools, as of January 2023 (without charter enrollment), was 49,560 students.</p> <p>Approximately 11 percent of the population in Census Tract 227.02 is under the age of 18. Based on Census Tract 227.02 statistics, and using the project’s estimated population increase of 253 persons (as described under subheading <i>Demographic Character Changes, Displacement</i>) the project could add approximately 28 school-aged children. This increase would not result in substantial adverse effects on local schools relative to existing overall enrollment. In addition, the applicant would be required to pay applicable school impact mitigation fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees “...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization.”</p> <p>The project site does not contain cultural facilities and the proposed action would not affect existing cultural facilities by its operation. Many cultural facilities are located within walking distance of the project site or accessible from the project site via public transportation and would be available to future project residents. Cultural facilities in the vicinity of the project site include the SOMArts Center, approximately 0.9 mile northwest of the site; and the Mission Arts Center, approximately 1.1 mile southwest of the site.</p> <p>Source List: 27</p>
Commercial Facilities	2	<p>The project site is within adequate and convenient pedestrian access to commercial services, including supermarkets, restaurants, coffee shops, drugstores, retailers, and other commercial opportunities.</p> <p>Supermarkets within 0.5 mile of the project site include the Good Life Grocery, approximately 0.3 mile southwest of the site; and Whole Foods Market, approximately 0.5 mile west of the site. Restaurants and coffee shops within 0.5 mile of the project site include Plow, approximately 0.13 mile west of the site; Chez Maman East, approximately 0.2 mile west of the site; PoBoys Kitchen, approximately 0.23 mile west of the site; The Ramp, approximately</p>

		<p>0.35 mile east of the site; and Hard Knox Café, approximately 0.5 mile southeast of the site. Drugstores within 0.5 mile of the project site include the Walgreens Pharmacy, approximately 0.27 mile northeast of the site.</p> <p>Therefore, adequate commercial facilities would be accessible to project residents.</p>						
<p>Health Care and Social Services</p>	<p>2</p>	<p>A wide array of health care and social services is accessible from the project site via public transit or pedestrian travel. The San Francisco Department of Public Health maintains two Divisions – the San Francisco Health Network and Population Health and Prevention. The San Francisco Health Network is the City's health system and has locations throughout the city, including San Francisco General Hospital Medical Center, Laguna Honda Hospital and Rehabilitation Center, and over 15 primary care health centers. The Population Health and Prevention Division has a broad focus on the communities of San Francisco and is comprised of the Community Health and Safety Branch, Community Health Promotion and Prevention Branch, and the Community Health Services Branch. Additionally, the project site is within one mile of the University of California-San Francisco Medical Center and Benioff Children's Hospital, and 0.3 mile southwest of the Concentra Urgent Care.</p> <p>The additional residents on the project site would not result in undue burdens on existing health care facilities or create substantial demand for new health care facilities. As discussed in <i>Demographic Character Changes, Displacement</i>, the project would potentially increase the population by 253 people. The level of population increase described above would not represent a substantial change to the demographic of the area and would not result in substantial impacts on the existing social services serving the project area.</p> <p>Source List: 28</p>						
<p>Solid Waste Disposal / Recycling</p>	<p>2</p>	<p>Recology San Francisco, Recology Sunset Scavenger, and Recology Golden Gate provide residential and commercial garbage and recycling services for the City of San Francisco. Solid waste generated by the project (during both construction and operational activities) would be disposed of at one of the City's licensed facilities. The solid waste generated by the project would be adequately served by existing providers with sufficient permitted capacity. During operation, the project could generate an estimated 188 tons of solid waste per year, based on conservative generation rates summarized by the California Department of Resources Recycling and Recovery for multi-family residential (8.6 pounds/per unit/per day). Table 5 shows the top five (by tonnage) of the 26 solid waste facilities that process waste from San Francisco.</p> <p style="text-align: center;">Table 5: Solid Waste Facilities Capacity</p> <table border="1" data-bbox="669 1659 1453 1827"> <thead> <tr> <th data-bbox="669 1659 930 1774">Facility</th> <th data-bbox="930 1659 1187 1774">Max. Daily Throughput (tons)</th> <th data-bbox="1187 1659 1453 1774">Remaining Capacity (cubic yards)</th> </tr> </thead> <tbody> <tr> <td data-bbox="669 1774 930 1827">Recology Hay Road</td> <td data-bbox="930 1774 1187 1827">2,400</td> <td data-bbox="1187 1774 1453 1827">30,433,000</td> </tr> </tbody> </table>	Facility	Max. Daily Throughput (tons)	Remaining Capacity (cubic yards)	Recology Hay Road	2,400	30,433,000
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		<table border="1" data-bbox="669 186 1450 493"> <tr> <td data-bbox="669 186 932 268">Corinda Los Trancos Landfill</td> <td data-bbox="932 186 1187 268">3,598</td> <td data-bbox="1187 186 1450 268">22,180,000</td> </tr> <tr> <td data-bbox="669 268 932 323">Altamont Landfill</td> <td data-bbox="932 268 1187 323">11,150</td> <td data-bbox="1187 268 1450 323">65,400,000</td> </tr> <tr> <td data-bbox="669 323 932 407">Potrero Hills Landfill</td> <td data-bbox="932 323 1187 407">4,330</td> <td data-bbox="1187 323 1450 407">13,872,000</td> </tr> <tr> <td data-bbox="669 407 932 493">Monterey Peninsula Landfill</td> <td data-bbox="932 407 1187 493">3,500</td> <td data-bbox="1187 407 1450 493">48,560,000</td> </tr> </table> <p data-bbox="669 493 1450 926">The amount of solid waste generated by the project would represent a small amount compared to the maximum daily throughput of these solid waste facilities and would not exceed facility capacities. Furthermore, pursuant to Section 1402 of the San Francisco Environment Code, the project applicant would be required to submit a waste diversion plan providing for a minimum of 65 percent diversion from landfill of construction and demolition debris. Section 1904 of the San Francisco Environment Code also would require the property manager to supply appropriate containers for recyclable and compostable material. Based on reported citywide diversion rates, it is expected that approximately 80 percent of solid waste generated on-site would be diverted from landfills. Therefore, the proposed action would not substantially increase the demand for solid waste removal service beyond current demand in this area.</p> <p data-bbox="669 926 1450 989">Source List: 29, 30, 31, 32</p>	Corinda Los Trancos Landfill	3,598	22,180,000	Altamont Landfill	11,150	65,400,000	Potrero Hills Landfill	4,330	13,872,000	Monterey Peninsula Landfill	3,500	48,560,000
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Waste Water / Sanitary Sewers	2	<p data-bbox="669 989 1450 1333">Wastewater generated at the project site would be treated by the San Francisco Public Utilities Commission (SFPUC), which provides wastewater collection and transfer service in the City. The SFPUC has a combined sewer and wastewater system, which collects sewage and stormwater in the same pipe network. The total volume of wastewater collected ranges from 70 million gallons per day (mgd) on average days, to 500 mgd on rainy days. Wastewater is collected and transported to one of three treatment plants (Southeast Water Pollution Control Plant, Oceanside Water Pollution Control Plant, and North Point Wet Weather Facility), where wastewater is treated before discharge into the San Francisco Bay and Pacific Ocean.</p> <p data-bbox="669 1333 1450 1753">The City currently holds two National Pollutant Discharge Elimination System permits that cover its wastewater treatment facilities. One permit adopted by the Regional Water Quality Control Board in August 2013 includes the Southeast Water Pollution Control Plant. Another permit adopted in August 2009 covers the Oceanside Water Pollution Control Plant. The permits specify discharge prohibitions, dry-weather effluent limitations, wet-weather effluent performance criteria, receiving water limitations, sludge management practices, and monitoring and reporting requirements. The permits prohibit overflows from the combined sewer outflow structures during dry weather and require wet-weather overflows to comply with the nine minimum controls specified in the federal Combined Sewer Outflow Control Policy.</p> <p data-bbox="669 1753 1450 1881">The project would result in the development of 120 affordable housing units. Total project wastewater generation is estimated by CalEEMod (Attachment B) to be approximately 11,204 gallons per day (4,089,341 million gallons divided by 365 days = 11,204 gallons per day). The</p>												

		<p>City's sewer system has the capacity to treat 575 million gallons per day. The wastewater generated by the project would not contribute to a citywide increase in sanitary flows, as project-generated wastewater would be approximately less than 0.1 percent of the City's total wastewater treatment capacity. Therefore, the proposed action would be accommodated by existing wastewater infrastructure, and would not result in water quality impacts associated with changes in wastewater discharges to San Francisco Bay.</p> <p>Source List: 33, 34, Attachment B</p>
Water Supply	2	<p>Development of the project site with 120 residential units would incrementally increase demand for water. According to SFPUC, the average San Francisco resident consumes approximately 42 gallons of water per day. The project's projected increase of 253 residents would therefore consume approximately 10,626 gallons per day. Additionally, water would be used for outdoor landscaping for a total of 332 gallons per day (Attachment B). The proposed action would thus consume approximately 10,948 gallons of water per day.</p> <p>Water would be provided to the project by the SFPUC. The 2020 Urban Water Management Plan for the City and County of San Francisco utilizes forecasted growth assumptions for the City and found that water supply for retail customers in the City would meet demand under all drought conditions through the year 2045. Since the project's anticipated population increase is accounted for in City and regional forecasts, associated water demand as a result of the project is within the forecasted supply estimates. Implementation of the proposed action would not have a substantial adverse effect on water supply.</p> <p>Source List: 35, 36, Attachment B</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The project area is served by the San Francisco Police Department, and the nearest station is located at 850 Bryant Street, approximately 1 mile northwest of the site. The development of residential uses on the project site would incrementally increase demand for police services within the San Francisco Police Department. The services required by the increase in demand would be funded through project-related increases to the city's tax base and would not be substantial given the overall demand for police protection services on a citywide level.</p> <p>The project site is served by the San Francisco Fire Department (SFFD). The nearest station is Fire Station #37, located at 798 Wisconsin Street, approximately 0.5 mile southwest of the project site. The project could incrementally increase demand for fire protection services within the project area. However, the project's anticipated population increase is accounted for in City and regional forecasts, and fire protection services would be adequately provided for increases in population, as stipulated by the City's General Plan. Additionally, the site is located along established streets within an existing service area and within the 0.5-mile radius threshold established in the Community Facilities Element, ensuring adequate response times would be maintained. The project also would be required to meet SFFD standards for adequate site access and water flow and would comply with current fire suppression building code requirements. Therefore, no substantial adverse effects on fire protection services are expected.</p> <p>SFFD firefighters are also trained as emergency medical technicians (EMTs), and some firefighters are also paramedics. Emergency medical response and patient transport is provided by SFFD, which also</p>

		<p>coordinates with Advanced Life Support and Basic Life Support Ambulance Providers. Furthermore, San Francisco ensures fire safety and emergency accessibility within new and existing developments through provisions of its Building and Fire Codes. The project would be required to conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for the proposed development. The project site is adequately served by emergency medical services and the project would not result in a significant change to existing emergency medical services already provided in the area.</p> <p>Source List: 37</p>
Parks, Open Space and Recreation	2	<p>The proposed action would result in the development of 120 residential units. The project includes the development of a ground-floor courtyard, as well as a south garden and rain garden nook.</p> <p>Several existing parks occur in the vicinity of the project site and would be available for use by project residents. Pennsylvania Garden is located immediately south of the project site, and Pennsylvania Railroad Garden is located immediately north of the project site. Other nearby parks include Mariposa Park, approximately 372 feet to the northeast; Jackson Park, approximately 0.28 mile to the west; and Crane Cove Park, approximately 0.33 mile to the east. Additionally, the Potrero Hill Recreation Center, which features a baseball diamond, tennis courts, and playgrounds, is located approximately 0.47 mile to the south. As described above, there are sufficient nearby parks, open spaces, and recreation opportunities to serve the project residents. The addition of 120 residential units to the neighborhood would not substantially burden or otherwise degrade existing parks and open spaces.</p> <p>The proposed action would not result in adverse impacts on open spaces or recreational facilities within the city nor would the proposed action place residents in a location devoid of parks or open space.</p>
Transportation and Accessibility	2	<p><i>Traffic</i></p> <p>The proposed action consists of the development of 120 affordable housing units. Residential development on the project site would generate vehicle trips on surrounding roadways. However, there are no vehicular parking spaces proposed; therefore, the number of trips generated by the project would likely be substantially less than a typical mid-rise apartment land use. Affordable housing developments typically have lower trip generation than market rate housing, and the site's proximity to transit connections would offer an alternative to car ownership. Conservatively analyzed for modeling purposes and based on weekday trip rate of 1.42 trips per dwelling unit from the Institute of Transportation Engineers (ITE), the addition of 120 residential units could generate an estimated 171 average daily trips. The minor increase in vehicle trips to the site from the proposed project would incrementally increase traffic and congestion in the vicinity but would not substantially adversely affect the local circulation system. A sizeable proportion of residents would make use of the extensive transit opportunities available proximate to the site, including several MUNI rail and bus lines. These rail and bus lines connect to the larger regional BART and Caltrain systems, which provide rail transit to multiple Bay Area counties. Therefore, proposed buildout of the project site would</p>

not result in substantial adverse effects on area roadways or intersection operations.

Transit

The project area is well-served by public transit. Several public transit lines operate in the vicinity of the site, including Caltrain, MUNI Metro Rail, and MUNI Rapid Bus. Development of the project site may potentially increase transit demand due to new residents on-site, but this additional demand would not noticeably adversely affect transit service. Therefore, the proposed action would not result in substantial adverse effects on transit service.

Source List: 38

Pedestrian

Pedestrian facilities include sidewalks, crosswalks, curb ramps, pedestrian call buttons at intersections, and mixed-use pathways. A sidewalk currently provides pedestrian access on Pennsylvania Avenue and Mariposa Street. Based on the anticipated population increase of 253 persons, residents generated by the project would not significantly impact the local transportation network (bicycles, pedestrians, public transit, etc.).

Development of the site would add residential units on a corridor that is well-served by nearby public transit. The proposed action would not result in physical barriers or reduced access or isolate a particular neighborhood or population group; no linear features that would cut off access are proposed, and the project would be contained on one parcel. Furthermore, it would not result in inconvenient or difficult access to local services, facilities and institutions, or other parts of San Francisco.

The proposed development would generate new pedestrian trips, but these additional trips would not result in unsafe conditions for pedestrians or cause crowding on nearby sidewalks, considering the existing urban setting of the project site. Therefore, the proposed action would not result in substantial adverse effects on pedestrian facilities.

Bicycles

Bicycle facilities generally consist of bicycle lanes, trails, and paths, as well as bike parking, bike lockers, and showers for cyclists. The San Francisco Bicycle Plan, now called the SFMTA Bicycle Strategy, presents a guideline for the City to provide the safe and attractive environment needed to promote bicycling as a transportation mode. The project site is adjacent to an existing bike route along Mariposa Street to the north.

New residential uses on-site would generate new bicycle trips, but these additional trips would not result in unsafe conditions for cyclists. Bicycle parking is required as part of the San Francisco Planning Code. For reference, Class I bike parking spaces are in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, non-residential occupants, and employees. Class II bike parking spaces are bicycle racks located in a publicly accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use. The proposed building would include 1,200 square feet of dedicated Class I bicycle parking and storage. The proposed action

		<p>would comply with the current code and would not result in substantial adverse effects on bicycle facilities.</p> <p>Source List: 39, 43</p> <p><i>Parking</i></p> <p>Development of the site would remove the existing on-site parking lot. San Francisco General Plan policies emphasize the importance of public transit use and discourage facilities that facilitate and encourage automobile uses, such as parking, to minimize the environmental impact of traffic congestion, noise, and air quality associated with unconstrained vehicle use.</p> <p>Source List: 40</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	<p>The project site is relatively flat and entirely paved. No surface waters (e.g., lakes, rivers, ponds) are located on or adjacent to the project site. The San Francisco Bay is located approximately 0.39 mile west of the project site. No unique features are on the site. This project would not affect water resources, nor would it use groundwater resources.</p> <p>As discussed in <i>Water Supply</i>, water service at the project site would be provided by the SFPUC. As discussed in <i>Drainage/ Storm Water Runoff</i>, development on the project site would not discharge effluent into surface water or groundwater. Wastewater at the project site would be collected and treated by the combined sewage and stormwater system.</p> <p>Source List: 17, 36</p>
Vegetation, Wildlife	2	<p>The project site is developed, paved, and lacks major landscaping or vegetation. Furthermore, the site is covered with impervious surfaces. The project site does not contain any wetland features, vernal pools, riparian habitat, or watercourses. The site is located in the highly urbanized Potrero Hill neighborhood of San Francisco, an area that lacks habitat able to host wildlife other than birds passing through. Therefore, the development of residential uses on the project site would not have a substantial adverse effect on vegetation or wildlife.</p> <p>Source List: 14, 17</p>
Other Factors	2	<p>The project would provide safe living and/or working conditions for residents or occupants by meeting applicable codes for new buildings, fire safety, life safety, and persons with disabilities.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Climate Change Impacts	2	<p>Construction and operation of the project would involve the emission of greenhouse gases (GHGs). Of these gases, carbon dioxide (CO₂) and methane (CH₄) are emitted in the greatest quantities from human</p>

	<p>activities. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with agricultural practices and landfills. Because GHGs absorb different amounts of heat, a common reference gas (CO₂) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as “carbon dioxide equivalent” (CO₂e), and is the amount of a GHG emitted multiplied by its global warming potential.</p> <p>The Council on Environmental Quality (CEQ) rescinded the 2019 <i>Draft NEPA Guidance on Consideration of Greenhouse Gas Emissions</i> and on January 9, 2023 issued the interim NEPA Guidance on GHG and Climate Change. This document builds upon the 2016 Guidance on GHG and Climate Change document to provide greater clarity and more consistency with how agencies address climate change in NEPA reviews.</p> <p>Like the 2016 guidance, the 2023 interim guidance recommends the quantification of a proposed action’s projected direct and indirect GHG emissions using available data and GHG quantification tools suitable for the proposed action. When quantifying the GHG emissions is infeasible or tools are not reasonably available then a qualitative analysis is acceptable, but the CEQ cautions against an in-depth analysis because climate change impacts are not attributable to a single action. Instead, it is recommended that the “rule of reason” and the “concept of proportionality” be used instead to evaluate GHG emissions. As described in the guidance, the rule of reason is inherent in NEPA and the CEQ regulations, allowing agencies to determine how to consider an environmental effect and prepare an analysis based on available information and expertise. Under the concept of proportionality, agencies should discuss impacts in proportion to their potential significance. In addition, when discussing GHG emissions the CEQ guidance allows agencies to include relevant approved federal, regional, state, tribal, or local plans, policies, or laws for GHG emissions to showcase if the proposed action’s GHG emissions are consistent with such plans or laws. This approach provides more policy context for GHG emissions. The guidance does not establish a significance threshold or determination level for GHG emissions. The 2023 interim guidance includes recommendations to agencies to consider reasonable alternatives that would make the actions and affected communities more resilient to the effects of a changing climate and to incorporate environmental justice considerations into their analyses of climate-related effects.</p> <p>Therefore, the annual GHG emissions generated by the proposed action were quantified using CalEEMod and compared to BAAQMD thresholds. Additionally, a qualitative assessment of the proposed action and its consistency with SB 32 was included by comparing the project to CARB’s 2022 Scoping Plan. The BAAQMD thresholds and CARB 2022 Scoping Plan are to show that GHG emissions are relevant to local and statewide plans that are aiming to reduce GHG emissions in California, which aligns with the national efforts to reduce GHG emissions across the United States.</p> <p>According to BAAQMD’s 2022 <i>CEQA Air Quality Guidelines</i>, a project would not result in an adverse effect involving greenhouse gas emissions if it would meet either Criterion A or B, as defined below.</p>
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	<p>Criterion A: Projects must include, at a minimum, the following project design elements:</p> <ol style="list-style-type: none"> 1. Buildings <ol style="list-style-type: none"> a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. 2. Transportation <ol style="list-style-type: none"> a. The project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target that reflects the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory: Evaluating Transportation Impacts in CEQA: <ol style="list-style-type: none"> i. Residential projects: 15 percent below the existing VMT per capita ii. Office projects: 15 percent below the existing VMT per employee iii. Retail projects: no net increase in existing VMT b. The project will achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. <p>Criterion B: Projects must be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).</p> <p>The proposed action is planned to be 100 percent electric with no natural gas usage. The proposed action is not anticipated to result in any wasteful, inefficient, or unnecessary energy usage. Additionally, the proposed action would not include parking spaces, and is located in an area with multiple public transit and pedestrian facilities. Therefore, the proposed action would meet the project design elements under Criterion A, discussed above.</p> <p>The quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Pursuant to the SB 32 goal, the 2022 Scoping Plan was created to assess the goals and measures for the state to achieve the reductions from the 2017 Scoping Plan. The 2022 Scoping Plan's strategies that are applicable to the proposed project include reducing fossil fuel use, energy demand, and VMT; maximizing recycling and diversion from landfills; and increasing water conservation. The projects would be served by Pacific Gas and Electric, which is required to increase its renewable energy procurement in accordance with SB 100 targets.</p> <p>The project site is approximately 0.4 mile (walking distance) north of the Caltrain 22nd Street Station. Residents can travel to the station on</p>
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		<p>foot or bike. Other public transit opportunities in the vicinity of the project site include MUNI Metro Rail and MUNI Rapid Bus. The availability of public transit options would reduce future residents' VMT and associated fossil fuel usage. Therefore, the project would be consistent with the 2022 Scoping Plan and emission reduction targets per SB 32.</p> <p>Source List: Attachment B</p>
Energy Efficiency	2	<p>Residential development on the project site would use energy produced in regional power plants using hydropower and natural gas, oil, coal, and nuclear fuels. On-site development would be required to meet current state and local standards regarding energy consumption, including Title 24 of the California Code of Regulations enforced by the DBI. Beyond compliance with the 2019 San Francisco Green Building Code and Title 24 requirements, the project would be required to achieve GreenPoint Rated status or achieve a status of LEED Silver. To reach the applicable standards, the project would involve the application of green building measures, which are detailed in the project's architectural plan set. Since the project would be required to adhere to 2019 California Green Build Standards, and would include energy reducing design features, the proposed action would not result in foreseeable energy inefficiencies and would not have a substantial adverse effect on energy consumption.</p>

Additional Studies Performed:

- Phase I Environmental Site Assessment (ESA). February 2023. Path Forward Partners, Inc.
- Explosive and Flammable Hazards Report. April 2024. Rincon Consultants, Inc.
- Noise Technical Report. April 2024. Rincon Consultants, Inc.
- Air Quality and Greenhouse Gas Study. April 2024. Rincon Consultants, Inc.

Field Inspection (Date and completed by): Site visit completed by Josh Carman and Michael Huang of Rincon Consultants, Inc. on January 25 and 26, 2024.

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Attachments:

- A. FEMA FIRM Map
- B. Air Quality and Greenhouse Gas Study
- C. Phase I Environmental Site Assessment
- D. Explosive and Flammable Hazards Report
- E. Standard Mitigation Measures Agreement
- F. Noise Technical Report
- G. Noise Waiver

List of Permits Obtained:

The proposed action would require a Site Permit, Street Improvement Permit, and Demolition Permit.

Public Outreach [24 CFR 50.23 & 58.43]:

The project applicant has not conducted formal public outreach for the proposed action at the time of preparation of this document. However, the applicant has preliminary met with immediate neighbors to the project site, as well as the Potrero Boosters Association (a local neighborhood group) to discuss the proposed action and solicit initial concerns.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is a stand-alone action on the project site and is not part of a series of activities. Its development capacity falls within current programmatic plans to develop affordable housing stock in the City that have been adopted by the City and County of San Francisco. It also falls within local and regional projections for population and housing. The environmental and social impacts of potential future development on-site have been evaluated as part of the project. Further cumulative impacts may occur as a result of other planned and pending development in the project site vicinity; however, as discussed in the Clean Air and Transportation and Accessibility sections, the project's air pollutant emissions would not exceed thresholds and the project would generate a nominal number of new vehicle trips. In addition, the project would not contribute to cumulative impacts related to other issues (e.g., soil suitability and hazards.) Therefore, the project would not result in additional cumulative impacts from future related actions.

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

Offsite Alternative: The consideration of an offsite alternative is not warranted because the project would involve development of a residential building on the specific site being studied and no adverse environmental impacts would occur that cannot be mitigated. As a private development project, the project's grant recipient does not own or control other suitable sites that would support similar development as the proposed action.

Reduced Project Alternative: Reducing the number of housing units would provide fewer affordable housing units within the project area. A reduced project with fewer units in a building of lower height and that would accommodate a smaller residential population would have similar environmental impacts as the proposed project, albeit with a slightly lower magnitude. In particular, by decreasing the number of residents on-site, a reduced residential project would reduce impacts associated with land use scale, air quality, traffic, and while noise impacts would be slightly reduced, noise impacts would still require mitigation. Additionally, the Reduced Project Alternative would decrease the number of residents and units, ultimately decreasing the project's financial viability. The Reduced Project Alternative would not support the City's goal of increasing the stock of affordable housing units since the project would not be maximizing the number of units available to residents.

No Action Alternative [24 CFR 58.40(e)]: If the proposed action were not implemented, the project site would continue to be an underutilized, vacant site. Because there would be no construction and no operational changes under the No Action Alternative, it would have no new adverse environmental effects. However, the No Action Alternative would not support the City's

goals of providing housing opportunities for homeless persons and generally increasing the supply of affordable housing units.

Summary of Findings and Conclusions:

The project would result in the development of 120 affordable housing units. The project site is bordered by a mix of institutional, commercial, and residential buildings.

The proposed action would not result in potentially significant environmental impacts to the extent that an Environmental Impact Statement would be required. For several environmental issues, the proposed action would result in minor adverse, but mitigable, impacts. In many other environmental issue areas, no adverse impact would occur.

The project site has been identified as having soil contamination present. Disturbance during construction could result in exposure to these contaminants. Therefore, preparation and implementation of a Site Mitigation Plan (SMP) and Health and Safety Plan (HASP) is required to ensure the proper disposal of any soil-based contaminants or hazardous materials.

There is a low potential for unrecorded historic period archaeological resources in the project area and a moderate potential for unrecorded Native American resources in the project area. The SMMA between MOHCD and SHPO would be implemented to avoid any potentially significant adverse effect from the proposed action on buried or submerged historical resources. This agreement includes conditions for an archaeological testing program, archaeological monitoring during construction, a data recovery program if required, protection of any human remains or funerary objects, and a final archaeological report.

Project construction could generate temporary disturbances to nearby residences. Mitigation measures would limit construction to specified hours, with the use of appropriate noise reduction techniques. During project operation, residents on-site could be exposed to unacceptable levels of existing ambient noise. Mitigation measures would be required to incorporate building materials that would reduce interior L_{dn} noise levels to 45 dBA or less.

For social impacts, the proposed action would benefit previously homeless and low to very-low-income populations in San Francisco by providing affordable housing with supportive services.

For all other issue areas, the proposed action would not result in substantial adverse impacts.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Clean Air	AQ-1 Indoor Air Filtration The mitigation actions listed below shall apply to all new residential units at the project:

	<ul style="list-style-type: none"> • Forced air mechanical ventilation with fresh air filtration using filter screens on outside air intake ducts must be provided for all residential units proposed on the site. The filter screens must have a minimum efficiency reporting value (MERV) 13 rating per Title 24 requirements. Air intakes must be located on the side of the building facing away from Interstate 280 and windows facing Interstate 280 cannot be capable of opening unless warranted to comply with California Building Code requirements for emergency egress. • For individual residential units with separate HVAC systems, a brochure notifying the future residents of the need for maintaining the filter screens and keeping windows closed to ensure adequate fresh air filtration must be prepared and provided at the time of lease signing. In addition, a notice of the diesel particulates risk hazard and the need for screen maintenance must be recorded in the property title and included with lease agreements. • Install high efficiency ceiling fans. • Windows and doors must be fully weatherproofed with caulking and weather-stripping that is rated to last at least 20 years.
Contamination and Toxic Substances	<p>HAZ 1 – Naturally Occurring Asbestos. As the project site is located within an ultramafic geologic unit and would be subject to the California Air Resources Board Asbestos Airborne Toxic Control Measure (ATCM) for construction and grading, the applicant shall notify the ATCM of the proposed project and provide the following information to the assigned Air Pollution Control Officer (APCO):</p> <ul style="list-style-type: none"> • Current development plan and any modifications to the development plan • Geologic, asbestos, and subsurface investigation/assessment documents for the project site <p>Upon notification of the information above, the APCO could require actions such as: a geologic evaluation, testing for ultramafic rock and/or asbestos testing, implementation of dust mitigation measures, and/or preparation of an asbestos dust mitigation plan. Based on test results, the APCO may also require additional assessment and/or air monitoring and testing during grading and construction due to the nature of naturally occurring minerals (asbestos) at the project site.</p> <p>The responsible entity, EHB-SAM, and APCO shall review and approve the required ATCM documents prior to demolition and grading (construction).</p> <p>HAZ 2 - Regulatory Agency Involvement – SAM. Because there is an open Cleanup Program case (San Francisco Department of Public Health, Environmental Health Branch [EHB] Site Assessment and Mitigation Program [SAM] case #1369) on the project site, EHB-SAM shall continue to be utilized for agency oversight of assessment and remediation within the project through completion of building demolition, subsurface demolition, and construction of facilities. Additionally, the applicant shall notify the EHB-SAM project manager of the following:</p>

- Current development plan and any modifications to the development plan
- Unexpected underground features
- All former environmental documents completed for the project site.

Upon notification of the information above, EHB-SAM could require actions such as: development of subsurface investigation workplans; completion of soil, soil vapor, and/or groundwater subsurface investigations; installation of soil vapor or groundwater monitoring wells; soil excavation and offsite disposal; completion of human health risk assessments; and/or completion of remediation reports or case closure documents. The project applicant shall retain a qualified environmental consultant (Professional Geologist [PG] or Professional Engineer [PE]) to conduct additional assessment or remediation work as required by SAM.

If groundwater wells, soil vapor monitoring probes, or sub-slab vapor points are identified during demolition, subsurface demolition, or construction at the project site, they shall be abandoned/destroyed by a qualified environmental consultant under permit from the City and County of San Francisco, Department of Public Health – EHB. Demolition activities shall be documented in a letter report submitted to EHB-SAM within 60 days of the completion of abandonment activities.

It should also be noted that EHB-SAM may determine that San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) or California Department of Toxic Substances Control (DTSC) may be best suited to perform the lead agency duties for assessment and/or remediation at the project site. Should the lead agency be transferred to SFBRWQCB or DTSC, this and other mitigation measures shall still apply to these agencies.

HAZ 3 – Remediation.

If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE) to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary for the proposed development.

The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate for the proposed development.

The project applicant shall review and approve the disposal recommendations prior to transportation of waste soils offsite, and

	<p>review and approve remedial engineering controls, prior to construction. Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.</p> <p>The lead agency and EHB-SAM shall review and approve the development site disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction.</p> <p>HAZ 4 – Site Mitigation Plan (SMP) for Impacted Soils. When requested by EHB-SAM, the project applicant shall retain a qualified environmental consultant (PG or PE), to prepare a Site Mitigation Plan (SMP) prior to construction. The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:</p> <ul style="list-style-type: none"> • Stockpile management including stormwater pollution prevention and the installation of Best Management Practices (BMPs) • Proper disposal procedures of contaminated materials • Monitoring and reporting • A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection. <p>The health and safety plan shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.</p> <p>The lead agency and EHB-SAM shall review and approve the development SMP for Impacted Soils prior to demolition and grading (construction).</p>
Endangered Species	<p>BIO-1 Nesting Bird Pre-construction Surveys and Monitoring. Project construction occurring between February 1 to September 15 shall require a preconstruction nesting bird survey no more than 14 days prior to the start of ground disturbing activities. A qualified biologist shall survey accessible areas within 150 feet (for passerines) and 500 feet (for raptors) of construction for active nests. Should an active nest be identified, the qualified biologist shall establish an avoidance buffer based on the needs of the species identified and pursuant to consultation with CDFW, if necessary, prior to initiation of construction activities. Avoidance buffers shall remain in place until the end of the general nesting season or upon determination by the qualified biologist that young have fledged, or the nest has failed. Should ground disturbance commence later than</p>

	<p>14 days from the survey date, an additional preconstruction survey shall be conducted prior to reinitiating work. Should work activity cease for 5 days or greater during the breeding season, surveys shall be repeated to ensure birds have not established nests during inactivity. If buffer zones are determined to be infeasible, a full-time qualified biological monitor shall be on site to monitor construction within the buffer zones to avoid impacts to active nests and nesting birds.</p>
Noise Abatement and Control	<p>NOI-1 Construction Noise Reduction.</p> <p>Construction activity will be limited to the period between 7:00 a.m. and 6:00 p.m. on weekdays and to the period 7:00 a.m. to 5:00 p.m. on weekends. Construction outside of these hours will require a permit from the City. Furthermore, construction contractors for development on the project site shall implement appropriate noise reduction measures, as determined by the City during the construction permit approval process. Required noise reduction measures shall be subject to San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code) and may include but are not limited to:</p> <ul style="list-style-type: none"> • Maintaining proper mufflers on equipment; • Relocating equipment away from noise-sensitive receptors where possible; and • Shutting off idling equipment. <p>NOI-2 Noise-Reducing Building Design.</p> <p>In order to reduce exterior noise levels to HUD’s required interior limit of 45 dBA DNL within all living units, the following noise attenuation measures shall be implemented:</p> <ul style="list-style-type: none"> • Provide mechanical ventilation so that windows may be left closed by occupants. This can be achieved passively with z-ducts, fresh air ducts, or an approved equal. • Exterior wall, window, and private balcony/patio doors must meet the minimum Sound Transmission Class (STC) ratings (Refer to Attachment F, Table 8). • Use permanently nonhardening sealant around perimeters of window frames. • Window assemblies shall be constructed with effective nonporous gaskets or weatherstripping to minimize air infiltration and sound leakage. • Provide airtight construction at all exterior walls with acoustical or other nonhardening sealant at floor plates. • Use door jam and head gasketing and door bottom gasketing at entry doors to seal the solid core doors against weather and sound. • All entry doors shall be insulated against weather and sound with nonporous seals. Caulk entry door thresholds as they are placed. <p>Implementation of the above noise attenuation measures would ensure that interior noise levels within the proposed project’s living units would be maintained at approximately 44 dBA DNL and below, thus complying with HUD’s interior noise limit of 45 dBA DNL. Pursuant to HUD requirements, prior to the issuance of a construction permit, the project applicant shall be required to submit</p>

	the window and door schedule (with STC ratings) to the Certifying Officer for review and approval.
Historic Preservation	The project would be required to comply with the terms of the Agreement Between the City and County of San Francisco and the California State Historic Preservation Officer Regarding 249 Pennsylvania Avenue Mixed-Use Project, San Francisco, California, May 17, 2024.


Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

DocuSigned by:
Preparer Signature:  Date: 5/17/2024 | 6:37 PM PDT

Name/Title/Organization: 08111D75020A42F..
Madeleine Sweet, Compliance Coordinator, SF MOHCD

DocuSigned by:
Certifying Officer Signature:  Date: 5/20/24
E09C20545F78457...

Name/Title: Daniel Adams Director City and County of San Francisco

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).