

APPENDIX B

INITIAL STUDY

ST. IGNATIUS FIELD LIGHTING PROJECT

PLANNING DEPARTMENT CASE NO. 2018-012648ENV-02

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APPENDIX B

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ST. IGNATIUS FIELD LIGHTING PROJECT

2001 37TH AVENUE

PLANNING DEPARTMENT CASE NO. 2018-012648ENV-02

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A. Project Description

The Saint Ignatius (St. Ignatius) Field Lighting Project on the St. Ignatius College Preparatory school campus at 2001 37th Avenue is described in EIR chapter 2, Project Description, of the environmental impact report (EIR), to which this initial study is attached.

B. Project Setting

The existing setting and land use characteristics are described in EIR chapter 2, section 2.D. The 2020 baseline conditions are described in EIR chapter 3, Environmental Setting, Impacts, and Mitigation Measures, section 3.A.4. The cumulative setting is provided in EIR chapter 3, Environmental Settings, Impacts, and Mitigation Measures, section 3.A.6.

The only reasonably foreseeable cumulative project within approximately one-quarter mile of the project site is the St. Ignatius Building Expansion Project, described in EIR chapter 3, Environmental Setting, Impacts, and Mitigation Measures, section 3.A.6.

C. Compatibility with Existing Zoning and Plans

	Applicable	Not Applicable
Discuss any variances, special authorizations, or changes proposed to the planning code or zoning map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or region, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any approvals and/or permits from city departments other than the planning department or the Department of Building Inspection, or from regional, state, or federal agencies.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

This section discusses potential inconsistencies of the proposed project with applicable local and regional plans and policies. Inconsistencies with existing plans and policies do not, in and of themselves, indicate a significant physical environmental effect. To the extent that adverse physical environmental impacts may result from such inconsistencies, these impacts are analyzed in this initial study under the specific environmental topic sections in section E, Evaluation of Environmental Effects, or in the EIR, as appropriate.

San Francisco Planning Code and Zoning Maps

The San Francisco Planning Code (planning code) incorporates by reference the City's zoning maps and governs permitted uses, densities, and configuration of buildings within San Francisco. Permits to construct new buildings or to alter or demolish existing buildings may not be issued unless the proposed project complies with the planning code. An exception or variance is granted pursuant to the provisions of the planning code or legislative amendments to the planning code. Exceptions or variances that have been granted are included and adopted as part of the proposed project.

LAND USE

The project site is on the southern portion of the St. Ignatius school campus and is limited to J.B. Murphy Field and the upper practice field. The school is located within the RH-1 (Residential-House, One Family)

zoning district. As stated in planning code section 209.1, RH-1 zoning districts are typically occupied by single-family houses rarely exceeding 35 feet in height and without side yards on 25-foot-wide by 120-foot-deep lots. Floor sizes and building styles tend to be uniform and reflect the period in which they were built. In most cases, the single-family character of these districts has been maintained for a considerable time. Planning code section 209.1 requires a conditional use authorization for school uses within the RH-1 zoning district. A conditional use authorization is also required for a planned unit development pursuant to planning code section 304. The school currently operates under a conditional use permit and planned unit development, with the latest amendment for the new field lighting and wireless telecommunications services facility approved July 23, 2020. Additional conditions were imposed by the Board of Supervisors on October 20, 2020, after an appeal of the Categorical Exemption and Conditional Use Authorization by the Saint Ignatius Neighborhood Association (neighborhood association or SINA) was denied. Current field lighting operations are governed by an agreement (St. Ignatius–SINA agreement) between St. Ignatius and the neighborhood association memorialized in the Superior Court’s final judgment on September 12, 2023, granting a writ of mandate upon completion of a new CEQA review.

The proposed project involves the construction and operation of four 90-foot-tall light standards at J.B. Murphy Field on up to 150 evenings during the school year and a wireless telecommunications services facility on the northwest light standard with ancillary equipment in a ground-level structure at its base, and the expanded evening use of lighting at the upper practice field during the school year. The project also includes athletic programming changes at both J.B. Murphy Field and the upper practice field. There would be a shift in the start and end times for certain practices, a shift in the days of the week when certain practices and games occur, and an increase in both number of practices and games in a school year.

The proposed project would require a conditional use authorization to amend an existing planned unit development pursuant to planning code sections 209.1, 303, and 304 with a rear yard modification to allow the siting of the light standards and the wireless telecommunications services facility within the required rear yard. The siting and installation of the wireless telecommunications services facility would follow all required policies and guidelines set forth in the City’s Wireless Telecommunications Services Facilities Siting Guidelines.¹

SETBACKS AND YARDS

Pursuant to planning code section 134, the proposed project is required to provide a rear yard located opposite the 37th Avenue frontage, equal to 25 percent of the total lot depth. The required 25 percent lot depth for the proposed project is 137 feet, 6 inches. The two western light standards and the wireless telecommunications services facility on the northwest light standard, along with associated equipment in the ground-level fenced compound, are located within the site’s required 25-percent rear yard. Therefore, the proposed project would not provide a compliant rear yard and would require modifications to the planned unit development to allow deviation from the rear yard requirements.

¹ City and County of San Francisco Planning Department, *Wireless Telecommunications Services (WTS) Facilities Siting Guidelines* (Planning Commission Resolution No. 14182), August 15, 1996, and *Supplement to the 1996 WTS Facilities Siting Guidelines* (Planning Commission Resolution No. 16539), March 13, 2003. Available at: <https://sfplanning.org/resource/wireless-telecommunications-services-wts-facilities-siting-guidelines>. Accessed September 23, 2025.

HEIGHT AND BULK

The project site is located within the 40-X height and bulk district. This district permits a maximum building height of 40 feet, with an additional 16 feet allowed for mechanical equipment and rooftop appurtenances, such as elevator penthouses, for a total allowable height of 56 feet. Pursuant to planning code section 270(a) (bulk limits: measurement), there are no bulk controls in an “X” district. Additionally, pursuant to planning code sections 260(b)(2)(J) and 260(b)(2)(I), “warning and navigation signals and beacons, light standards, and similar devices ...” and “wireless telecommunications services facilities and other antennae ...” are exempt from the height limits established by article 2.5 of the planning code. Therefore, the proposed project would be exempt from applicable height and bulk limits.

Plans and Policies

SAN FRANCISCO GENERAL PLAN

The San Francisco General Plan (general plan) establishes objectives and policies to guide land use decisions related to the physical development of San Francisco. The general plan comprises ten elements, each of which addresses a particular topic that applies citywide: air quality; arts; commerce and industry; community facilities; community safety; environmental protection; housing; recreation and open space; transportation; and urban design. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in section E, Evaluation of Environmental Effects. The compatibility of the proposed project with general plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. The proposed project includes the construction of four 90-foot-tall light standards at J.B. Murphy Field; a wireless telecommunications services facility on the northwest light standard; the installation of safety lights at the J.B. Murphy Field bleachers and sidewalks; the proposed operation of four 90-foot-tall standards with light-emitting diode (LED) light fixtures; an updated amplified sound/PA system at J.B. Murphy Field; and the expanded use of outdoor lights on the four 40-foot-tall light standards at the school’s upper practice field. The proposed project would not introduce incompatible land uses to the neighborhood and would not otherwise conflict with any general plan policies or objectives. Thus, the proposed project would not be inconsistent with the general plan.

PROPOSITION M – THE ACCOUNTABLE PLANNING INITIATIVE

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added section 101.1 to the planning code and established eight priority policies. These policies, and the topics in section E, Evaluation of Environmental Effects, that address the environmental issues associated with these policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character; (3) preservation and enhancement of affordable housing (Population and Housing, regarding housing supply and displacement issues); (4) discouragement of commuter automobiles (sections E.5(a) and E.5(b)), Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; (6) maximization of earthquake preparedness (sections E.14(a) through E.14(d), Geology and Soils); (7) preservation of landmark and historic buildings (section E.3(a), Cultural Resources); and (8) protection of open space (section E.9, Wind; section E.10, Shadow; Recreation; and section E.12, Public Services). The City is required to find that the proposed project or legislation would be consistent with the priority policies: (1) prior to issuing a permit for

any project that requires an initial study under CEQA, (2) prior to issuing a permit for any demolition, conversion, or change of use, and (3) prior to taking any action that requires a finding of consistency with the general plan.

As noted, the compatibility of the proposed project with general plan objectives and policies that do not relate to physical environmental issues will be considered by decision-makers in determining whether to approve or disapprove the project. Any potential conflicts identified through this process would not alter the project's physical environmental effects.

REGIONAL PLANS AND POLICIES

The four principal regional planning agencies and their overarching policies and plans (noted in parentheses) that guide planning in the nine-county Bay Area include the Bay Area Air Quality Management District (2017 Clean Air Plan), the Metropolitan Transportation Commission (Plan Bay Area 2050), the San Francisco Regional Water Quality Control Board (San Francisco Basin Plan), and the San Francisco Bay Conservation and Development Commission (San Francisco Bay Plan). Due to the location, size, and nature of the proposed project, the proposed project is not anticipated to be inconsistent with regional plans and policies.

D. Summary of Environmental Effects

The proposed project could result in adverse physical effects on the environmental resources identified below. Where such impacts are significant or potentially significant, the California Environmental Quality Act (CEQA) requires identification of mitigation measures to reduce their severity to a less-than-significant level, to the extent feasible. This initial study provides a more detailed checklist and discussion of each environmental resource, unless otherwise noted.

- | | | |
|---|--|--|
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hydrology and Water Quality |
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Wind | <input type="checkbox"/> Hazards and Hazardous Materials |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Shadow | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Recreation | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Tribal Cultural Resources | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Agriculture and Forestry Resources |
| <input type="checkbox"/> Transportation and Circulation | <input type="checkbox"/> Public Services | <input type="checkbox"/> Wildfire |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Mandatory Findings of Significance |
| <input type="checkbox"/> Air Quality | <input type="checkbox"/> Geology and Soils | |

Approach to Analysis

This initial study examines the proposed project to identify potential effects on the environment. For each item on the initial study checklist, the evaluation has considered the impacts of the proposed project both individually and cumulatively. All items on the initial study checklist that have been checked "less-than-significant impact," "no impact," or "not applicable" indicate that, upon evaluation, the planning department has determined that the proposed project could not have a significant adverse environmental effect relating to that topic. For all of the items checked "no impact" or "not applicable" without discussion, the

conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the planning department, such as the California Department of Conservation’s Farmland Mapping and Monitoring Program. A discussion is included for those topics checked “less-than-significant impact” and for most items checked with “no impact” or “not applicable.” Impacts identified as “potentially significant” are analyzed in detail in the EIR. The “potentially significant” designation does not reflect a determination that the proposed project would result in a significant impact related to the particular topic. Topics designated as “potentially significant” are included in the EIR because the City determined that additional analysis was needed to determine the potential effect with respect to that environmental topic. The approach to baseline conditions used in this initial study and EIR is discussed in EIR chapter 3, section A.4, Approach to Baseline Conditions.

EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

Based on this initial study, the following topics have been identified as having potentially significant project-specific effects:

- Aesthetics (light and glare)
- Noise (operational noise)

These environmental topics are evaluated in the EIR prepared for the proposed project.

EFFECTS FOUND TO BE LESS THAN SIGNIFICANT OR HAVE NO IMPACT

The following topics were analyzed in the initial study and were determined to have less-than-significant or no individual or cumulative environmental impacts:

- Land Use and Planning (all topics)
- Aesthetics (all topics except for light and glare)
- Population and Housing (all topics)
- Cultural Resources (all topics)
- Tribal Cultural Resources (all topics)
- Transportation and Circulation (all topics)
- Noise (all topics except for operational noise)
- Air Quality (all topics)
- Greenhouse Gas Emissions (all topics)
- Wind (all topics)
- Shadow (all topics)
- Recreation (all topics)
- Utilities and Service Systems (all topics)
- Public Services (all topics)
- Biological Resources (all topics)
- Geology and Soils (all topics)
- Hydrology and Water Quality (all topics)
- Hazards and Hazardous Materials (all topics)
- Mineral Resources (all topics)
- Energy (all topics)
- Agriculture and Forestry Resources (all topics)
- Wildfire (all topics)

These items are discussed in section E, Evaluation of Environmental Effects, of this initial study and therefore require no further environmental analysis in the EIR.

E. Evaluation of Environmental Effects

No Impact or Not Applicable Environmental Topics

The proposed project would not result in impacts on the following environmental topics; therefore, they are not analyzed further in this initial study: population and housing, recreation, mineral resources, agriculture and forestry resources, and wildfire. This section provides a brief explanation of why these topics would have no impact or are not applicable to the proposed project.

POPULATION AND HOUSING

The project would not involve development of residential units that directly and substantially increase the population of San Francisco. Additionally, the project would not require displacement or relocation of existing people or housing units that would necessitate construction of replacement housing. The project would not directly or indirectly induce population growth, and no substantial unplanned growth would occur. Therefore, the project would have no impact on population and housing and would not contribute to cumulative population and housing impacts.

RECREATION

The proposed project would not increase the population of San Francisco. Accordingly, the project would not substantially increase the use of existing parks and recreational facilities in a manner that would cause or accelerate physical deterioration. In addition, the project would not require the construction of new recreational facilities or the expansion of existing facilities in the project vicinity. Therefore, the project would have no impact on recreation and would not contribute to cumulative recreational impacts.

MINERAL RESOURCES

The project site is not located in an area with known mineral resources and would not extract mineral resources. Therefore, the proposed project would have no impact on mineral resources and would not have the potential to contribute to any cumulative mineral resources impact.

AGRICULTURE AND FORESTRY RESOURCES

The project site is within an urbanized area in the City and County of San Francisco that does not contain any prime farmland, unique farmland, or farmland of statewide importance; forest land; or land under Williamson Act contract. The area is not zoned for any agricultural uses. Therefore, the proposed project would have no impact, either individually or cumulatively, on agriculture and forestry resources.

WILDFIRE

The project site is not located in or near state responsibility lands for fire management or lands classified as very high fire hazard severity zones. Therefore, this topic is not applicable to the proposed project.

Automobile Delay and Vehicle Miles Traveled

CEQA section 21099(b)(1) requires that the Governor’s Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that “promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” CEQA section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA.

In January 2016, the OPR published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA² recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted the OPR’s recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution No. 19579). In January 2019, changes to the CEQA statutes and guidelines went into effect, including a new section 15064.3 that states that VMT is the most appropriate measure of transportation impacts and includes updated criteria for analyzing transportation impacts. The VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as riding transit, walking, and bicycling. Therefore, the topic of automobile delay is not applicable to the proposed project.

1. Land Use and Planning

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: The proposed project would not physically divide an established community. (*Less than Significant*)

Land use impacts related to the physical division of an established community typically involve the construction of a physical barrier to neighborhood access, such as a new freeway, or the removal of an existing means of access, such as a bridge or roadway.

The project site is bordered by single-family residences to the west and south, a public recreational park and community garden to the north, St. Ignatius school to the east and north, and Sunset Boulevard to the east.

² Governor’s Office of Planning and Research. Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, January 20, 2016. Available at: http://opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf. Accessed September 26, 2025.

Across from the project site, there are several approximately 25-foot-tall streetlights along the east side of 39th Avenue and the north side of Rivera Street. There is also a nearby utility right-of-way containing approximately 40-foot-tall utility poles along 39th Avenue and Rivera Street.

The proposed project would involve the construction and operation of four 90-foot-tall light standards at J.B. Murphy Field, including a wireless telecommunications services facility located on the northwest light standard and a ground-level structure for ancillary equipment at its base.³ The project also includes expanded lighting operations for the existing lighting at the upper practice field to match J.B. Murphy Field lighting operations. With project implementation, St. Ignatius would continue to use its existing athletic facilities but would shift scheduled hours of athletic use into the evening. Surrounding land uses would continue to operate without disruption.

The proposed project would not permanently or temporarily close any streets and would not construct a physical barrier to neighborhood access or remove an existing means of access, such as a bridge or roadway, that would create an impediment to the passage of persons or vehicles. Therefore, the project would not physically divide an established community, and impacts would be less than significant. No mitigation is required.

Impact LU-2: The proposed project would not cause a significant physical environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. (*Less than Significant*)

Land use impacts could be considered significant if the project conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans are those that directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of a physical environment. Conflicts with plans, policies, or regulations do not necessarily indicate a significant environmental impact under CEQA, unless the project would substantially conflict with a land use plan, policy, or regulation that was adopted for the purpose of avoiding or mitigating an environmental effect, such that a substantial adverse physical change in the environment would result. To the extent that such substantial physical environmental impacts may result from such conflicts, this initial study and EIR disclose and analyze the physical impacts under the relevant environmental topic sections.

As discussed in section C, Compatibility with Existing Zoning and Plans, applicable land use plans, policies, and regulations that govern development within the project area include the San Francisco General Plan, 2017 Clean Air Plan, Plan Bay Area 2050, San Francisco Basin Plan, and San Francisco Bay Plan. Due to the location, size, and nature of the proposed project, the proposed project would not be inconsistent with local or regional plans and policies.

The proposed project would require a conditional use authorization to amend St. Ignatius's existing planned unit development pursuant to planning code sections 209.1, 303, and 304 with a rear yard modification to allow the siting of the two western light standards closest to 39th Avenue. The conditional use authorization would adhere to the City's policies and guidelines for the siting and installation of a wireless

³ The four 90-foot-tall light standards were constructed in November 2021. The wireless telecommunications services facility and ancillary equipment were installed subsequent to the construction of the light standards.

telecommunications services facility on the northwest light standard and immediately adjacent to the standard at ground level.

The City does not have specific plans, policies, or ordinances addressing light pollution from outdoor lighting such as a Dark Sky Ordinance; however, certain policies, including Policy 4.3 in the Urban Design Element, address the provision of adequate lighting in public areas for safety purposes (e.g., streets, sidewalks, crosswalks, exits, and parking lots) while considering the need to shield light and glare from nearby residential properties. Similar to the existing lighting system at the upper practice field, the proposed project's lighting system would provide optimal illumination at J.B. Murphy Field with maximum shielding to minimize light spill and glare effects on surrounding residences during evening practices and games. The proposed project would continue to adhere to applicable plans, policies, and environmental regulations and therefore would not conflict with plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Accordingly, impacts would be less than significant. No mitigation is required.

Impact C-LU-1: The proposed project in combination with cumulative projects would not result in a significant cumulative impact related to land use and planning. (*Less than Significant*)

The only cumulative project within 0.25-mile radius of the project site is the St. Ignatius Building Expansion Project, which entails demolition of five buildings and construction of a new addition to the main academic building. This cumulative project, which would occur within the existing boundaries of the St. Ignatius school campus and would maintain the existing school use, was determined to be consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations. The building expansion project includes minimal ground-level lighting for pedestrian safety needs and does not propose new exterior field lighting.

Given the nature and scope of the cumulative project, it would not combine with the proposed project in a manner that would result in a conflict with a land use plan, policy, or regulation adopted for the purpose of mitigating an environmental effect. Furthermore, the cumulative project would not combine with the proposed project to alter the land use pattern of the immediate area or physically divide an established community. Therefore, the proposed project, in combination with the cumulative project, would not result in cumulative land use impacts. Accordingly, cumulative impacts related to land use would be less than significant. No mitigation is required.

2. Aesthetics

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from public accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact AES-1: The proposed project would not have a substantial adverse effect on a scenic vista. (Less than Significant)

The proposed project would involve construction and operation of the J.B. Murphy Field lighting system, as well as the expanded use of existing lighting at the upper practice field during the school year. There are no officially designated scenic vistas within the project site, elsewhere on the school campus, or in the surrounding area that would be affected by the placement or operation of the four 90-foot-tall light standards along the perimeter of J.B. Murphy Field. The northwest light standard would host a wireless telecommunications services facility with an associated ground-level fenced compound at its base.

The proposed project would modestly alter some private views from nearby residences, with homes located immediately across from the school along 39th Avenue and Rivera Street being the most affected. The most noticeable project elements would be the new light standards—particularly the northwest light standard that would include the wireless telecommunications services facility—as well as the nighttime lighting used to illuminate the playfields.

Changes to private views would vary depending on proximity to the project site, the quality of the existing view, and the relative sensitivity of the viewer. Some residents may perceive these changes as undesirable; however, CEQA does not consider impacts to private views to be significant. Thus, the proposed project’s effect on private views would not constitute a potentially significant environmental impact.

Given the dense urban setting of the project site, the continued use of the site as an athletic facility, and the limited introduction of new visual elements, the project would not substantially detract from views of the school campus, surrounding buildings, or adjacent streetscapes and vistas (e.g., Sunset Boulevard). As a

result, there would be no substantial adverse effect on a scenic vista. Impacts would be less than significant. No mitigation is required.

Impact AES-2: The proposed project would not substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway. (*Less than Significant*)

There are no designated scenic highways in San Francisco.⁴ Scenic resources are visible physical features within a landscape and include natural features such as mountains, forests, and coastlines, as well as man-made elements, including historic buildings and landmarks. No scenic resources are present on or adjacent to the project site.

The proposed project would not remove any trees. The project would add approximately 25 new street trees along 39th Avenue and Rivera Street. The overall effect on scenic resources on the project site and in the surrounding area as a result of the proposed project would be similar to baseline conditions, as the project site is already developed and in use as an athletic facility. Although the project would alter the project site, it would not substantially degrade scenic resources, and impacts would be less than significant. No mitigation is required.

Impact AES-3: The proposed project would result in a change to the existing character of the project site, but this change would not degrade the visual character or quality of the site and its surroundings. (*Less than Significant*)

The existing visual character of the project site and the surrounding neighborhood consists of a mix of single-family residential and institutional uses, including the 11-acre St. Ignatius school campus, the West Sunset Soccer Fields, the A.P. Giannini Middle School, the Sunset Elementary School, and the Ortega Branch Public Library. Existing structures in the area range from approximately 25 to 40 feet tall, including 25-foot-tall cobra-style streetlights and 40-foot-tall utility poles with overhead utility lines. The project site and surrounding topography are generally flat, allowing for extended views that include the onsite field lighting at the upper practice field (four 40-foot-tall light standards) and the existing mature tree canopy (40 to 50 feet) along Sunset Boulevard to the east and the perimeter of the West Sunset Soccer Fields to the north.

The installation of four 90-foot-tall light standards, field and safety lighting, and the wireless telecommunications services facility would noticeably alter the visual character of the project site. However, this change would not degrade the visual character or quality of the project site and its surroundings for the reasons discussed below.

As shown in **Figure 1**, p. B.13, and **Figure 2**, p. B.14, the four light standards would introduce new vertical elements to the project site, consistent with its primary function as a school athletic facility. See **Figure 3**, p. B.15, for a comparison of baseline and existing views of the northwest light standard and the wireless telecommunications services facility equipment. The two light standards along the western property line on

⁴ California Department of Transportation (Caltrans), California State Scenic Highways, 2024. Available at: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>. Accessed September 26, 2025.

39th Avenue would be the most prominent from surrounding streets, as they are located immediately adjacent to the sidewalk. The other two light standards would be installed farther east within J.B. Murphy Field and would be less visually prominent from the public right-of-way. The proposed antennae and associated telecommunications equipment mounted on the northwest light standard would be visible and could introduce a degree of visual contrast with the light standard, although they would be painted to match the structure, minimizing this contrast. Therefore, these features would not substantially diminish the visual quality of J.B. Murphy Field or the school.

The proposed ground enclosure for the wireless telecommunications services facility equipment would be minimally visible from the public right-of-way, as J.B. Murphy Field is surrounded by a steel fence and landscaping. The enclosure would be viewed in the context of the athletic facility, which includes bleachers and other small structures for athletic equipment storage, and its incremental visual effect would be minimal. The addition of small-scale safety lighting at the bleachers and along sidewalks surrounding the field would also have a minimal visual effect, as similar lighting already exists on and near the project site.

To optimize illumination of J.B. Murphy Field, the four light standards would be installed along the field perimeter. Although visible from surrounding streets, the light standards would not be clustered closely together and would not block views to or through the school from nearby streets.

The proposed project would not remove any trees and would plant 25 new street trees along 39th Avenue and Rivera Street.

Given the dense urban setting of the project site, its continued use as an athletic facility, and the limited introduction of new project elements into views of the site, the project would not result in a substantial adverse effect on the visual character or quality of the project site or its surroundings. Impacts would be less than significant. No mitigation is required.

Figure 1 Baseline and Proposed Views Looking Southeast along 39th Avenue



**St. Ignatius Field Lighting Project
(Case No. 2018-012648ENV-02)**

**Looking Southeast from 39th Ave.
View #1**

Source: Verizon, 2019

Figure 2 Baseline and Proposed Views Looking Northeast along 39th Avenue



**St. Ignatius Field Lighting Project
(Case No. 2018-012648ENV-02)**

**Looking Northeast from 39th Ave.
View #2**

Source: Verizon, 2019

Figure 3 Baseline and Existing Views Looking Southeast along 39th Avenue



**St. Ignatius Field Lighting Project
(Case No. 2018-012648ENV-02)**

**Looking Southeast from 39th Ave.
View #1**

Source: Google Earth, 2026

Impact AES-4: The proposed project could create a new source of substantial light or glare which could adversely affect daytime or nighttime views in the area. (*Potentially Significant*)

Implementation of the proposed project could result in potentially significant aesthetics impacts related to light and glare; therefore, this topic is analyzed further in EIR section 3.B, Aesthetics.

Impact C-AE-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in a significant cumulative aesthetics impact on scenic vistas, scenic resources, and the visual character of the site and its surroundings. (*Less than Significant*)

The only cumulative project within a 0.25-mile radius of the project site is the St. Ignatius Building Expansion Project, which entails demolition of five buildings and construction of a new addition to the main academic building. Construction, including demolition and site preparation, and operation of this cumulative project would occur within the existing boundaries of the St. Ignatius school campus and would maintain the existing school use. The project would not obscure or block any scenic vistas or views from the project site (e.g., adjacent parks, streets, and boulevards) or from the St. Ignatius campus to the surrounding area. Construction would not result in the removal of any scenic resources, as the buildings to be demolished are not considered historical resources.

Due to the nature and scope of the cumulative project, it would not combine with the proposed project in a manner that would result in a substantial change to a scenic vista, the damage or removal of scenic resources, or a substantial change to the visual character of the project site and its surroundings. Therefore, the proposed project, in combination with the cumulative project, would not result in cumulative aesthetic impacts. Accordingly, cumulative impacts related to scenic vistas, scenic resources, and visual character would be less than significant. No mitigation is required.

Impact C-AE-2: Operation of the proposed project, in combination with cumulative projects, could result in a significant cumulative aesthetics impact associated with light and glare and daytime and nighttime views. (*Potentially Significant*)

The operational characteristics of the proposed project that could affect views would be primarily associated with the evening use of lighting for J.B. Murphy Field events. Cumulative aesthetic impacts are not anticipated as the only cumulative project in the immediate vicinity is the St. Ignatius Building Expansion Project, which would not combine with proposed project operations. However, the potential for cumulative aesthetic impacts related to light and glare, as well as daytime and nighttime views, will be discussed further in EIR section 3.B, Aesthetics.

3. Cultural Resources

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact CR-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource. (Less than Significant)

Historical resources are those properties that meet the terms of the definitions in Public Resources Code section 21084.1 and CEQA Guidelines section 15064.5. Historical resources include properties listed in, or formally determined eligible for listing in, the California Register of Historic Resources (California Register) or those listed in an adopted local historic register. The term “local historic register” or “local register of historical resources” refers to a list of resources that are officially designated or recognized as historically significant by a local government pursuant to resolution or ordinance. Historical resources also include resources which meet certain criteria and are identified as significant in a historical resource survey. A property that is not listed but based on substantial evidence is determined to be historically significant, would also be considered a historical resource. A property may be considered a historical resource if it meets any of the California Register criteria related to (1) events, (2) persons, (3) architecture, or (4) information potential that make it eligible for listing in the California Register, or if it is considered a contributor to an existing or potential historic district. The significance of a historical resource is materially impaired when a project “demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance.”

The initial development of the St. Ignatius campus began in 1967 and included permits issued for the track and football field. The main campus buildings were constructed in 1969–1970. The original campus included the academic building, Cowell Pavilion, Wilsey Library, Orradre Chapel, Carlin Commons, McGucken Hall, and J.B. Murphy Field. Aerial photographs confirm the track-and-field were under construction in 1968 and completed with bleachers by 1974. Later development phases in the 1990s and 2000s added athletic and classroom facilities.

A *historic resource evaluation* (HRE) for the St. Ignatius College Preparatory campus was prepared in July 2022 for the St. Ignatius Building Expansion Project.⁵ In August 2023, the planning department

⁵ Jonathan Lammers (JL), *Historic Resource Evaluation, 2001 37th Avenue (St. Ignatius College Preparatory campus)*, July 2022. Available at: [HRE_2001_37th_Ave_St_Ignatius_2021-011801_updated.pdf](#). Accessed September 26, 2025.

conducted a response to the evaluation and determined that no historical resources are present at the property located at 2001 37th Avenue. As a result, the property is not eligible for listing in the California Register, either individually, as part of a stand-alone historic district, or as a district contributor.⁶ Additionally, the project site is not directly adjacent to any known historical resources.

The proposed project would involve the construction and operation of field lighting at J.B. Murphy Field, including a wireless telecommunications services facility on the northwest light standard and associated ground-level structure at its base, as well as the expanded use of existing lighting at the upper practice field during the school year. The proposed project would not cause a substantial adverse change in the significance of any historical resource. This impact would be less than significant. No mitigation is required.

Impact CR-2: The proposed project would not cause a substantial adverse change in the significance of an archaeological resource. (*Less than Significant*)

Archaeological resources are defined as those that: (1) are significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California; (2) meet the criteria for listing in the California Register; or (3) are defined as a unique archaeological resource.

Construction of the proposed project would involve excavation of up to 30 feet below ground surface at four discrete locations for the installation of the four 90-foot-tall light standards. Excavation would require the removal of approximately 60 cubic yards of soil. On December 28, 2018, the planning department's staff archaeologist conducted a preliminary archaeological review for the proposed project and determined that no CEQA-significant archaeological resources are expected within project-affected soils.⁷ No resource findings were reported during the excavation. Thus, the likelihood of encountering archaeological resources at the four discrete locations where soils would be excavated is low. Impacts on archaeological resources would be less than significant. No mitigation is required.

Impact CR-3: The proposed project would not disturb any human remains, including those interred outside of formal cemeteries. (*Less than Significant*)

CEQA Guidelines section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered.

The construction of the four 90-foot-tall light standards at discrete locations along the perimeter of J.B. Murphy Field would include the excavation and removal of approximately 60 cubic yards of soils. The proposed project would not include new, future construction that would result in potential disturbance to any human remains. No known human remains, including those interred outside of dedicated cemeteries, are located in the immediate vicinity of the project site. Therefore, impacts from the proposed project on previously unknown human remains would be less than significant. No mitigation is required.

⁶ San Francisco Planning Department, *Historic Resource Evaluation Response, 2001 37th Avenue (St. Ignatius College Preparatory campus)*, Planning Record 2022-012254ENV, August 3, 2023. Available at: [HRER Pt.1 2001 37th Avenue.pdf](#). Accessed September 26, 2025.

⁷ San Francisco Planning Department, *CEQA Categorical Exemption Determination, 2001 37th Avenue (2018-012648ENV)*, July 23, 2020.

Impact C-CR-1: The proposed project in combination with cumulative projects would not result in cumulative impacts on architectural resources. (No Impact)

The only cumulative project is the St. Ignatius Building Expansion Project, which entails the demolition of five buildings and the construction of a new building addition within the boundaries of the school campus. As discussed in Impact CR-1, there are no architectural resources associated with the school campus. The proposed project would not combine with the cumulative project to result in a significant cumulative impact. Therefore, there would be no impact on architectural resources.

Impact C-CR-2: The proposed project in combination with cumulative projects would not result in significant cumulative impacts on archaeological resources and human remains. (Less than Significant)

Project-related impacts on archaeological resources and human remains are generally site specific and limited to a project’s construction and staging areas.

The only cumulative project is the St. Ignatius Building Expansion Project, which comprises the demolition of five buildings, excavation to a depth of 19 feet below ground surface, and construction of a new building addition within the existing boundaries of the school campus. As discussed in Impact CR-2 and Impact CR-3, the potential for encountering archaeological resources or human remains on the school campus is low.

Therefore, the proposed project would not combine with past, present, and reasonably foreseeable future projects to result in a significant cumulative impact on archaeological resources and human remains. No mitigation is required.

4. Tribal Cultural Resources

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact TCR-1: The proposed project would not result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. (*Less than Significant*)

CEQA section 21074 requires the lead agency to consider the effects of a project on tribal cultural resources. As defined in CEQA section 21074, tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that also are either (a) included or determined to be eligible for inclusion in the California Register or (b) included in a local register of historical resources, as defined in CEQA section 5020.1(k).

Pursuant to CEQA section 21080.3.1(d), on January 22, 2024, the planning department contacted Native American individuals and organizations in the San Francisco area, providing a description of the proposed project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity.⁸ During the 30-day comment period, two Native American tribal representatives responded to the planning department’s request for consultation; however, neither party requested mitigation measures be added to the proposed project.

A tribal cultural resource is adversely affected when a project impacts its significance. Based on the preliminary archaeological review prepared for the project, no CEQA-significant archaeological resources are expected within the project-affected soils. Therefore, implementation of the proposed project has low potential to result in substantial adverse changes to prehistoric resources, which includes tribal cultural resources. Impacts on tribal cultural resources would be less than significant. No mitigation is required.

Impact C-TCR-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on tribal cultural resources. (*Less than Significant*)

Environmental impacts on tribal cultural resources generally are site specific and encompass areas within or immediately adjacent to a project site.

⁸ San Francisco Planning Department, Tribal Notification Regarding Tribal Cultural Resources and CEQA, January 22, 2024.

The only cumulative project is the St. Ignatius Building Expansion Project, which is comprised of the demolition of five buildings, excavation to a depth of 19 feet below ground surface, and construction of a new building addition within the existing boundaries of the school campus. Like the proposed project, a preliminary archaeological review prepared for the St. Ignatius Building Expansion Project determined that no CEQA-significant archaeological resources, i.e., prehistoric resources which include tribal cultural resources, are expected within the project-affected soils. Therefore, the proposed project would not combine with cumulative projects to result in a significant cumulative impact on tribal cultural resources. No mitigation is required.

5. Transportation and Circulation

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Involve construction that would require a substantially extended duration or intensive activity, and the effects would create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially delay public transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Cause substantial additional vehicle miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Result in a loading deficit, and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Result in a substantial vehicular parking deficit, and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project involves the construction and operation of four 90-foot-tall light standards at J.B. Murphy Field on up to 150 evenings during the school year and a wireless telecommunications services facility on the northwest light standard with ancillary equipment in a ground-level structure at its base, and the expanded evening use of lighting at the upper practice field during the school year. With respect to transportation and circulation, the project also includes athletic programming changes at both J.B. Murphy Field and the upper practice field. There would be a shift in the start and end times for certain practices, a shift in the days of the week when certain practices and games occur, and an increase in both number of practices and games in a school year. The transportation and circulation analysis focuses on how trips associated with the proposed athletic programming changes would affect the transportation network compared to 2020 baseline conditions prior to installation of field lighting at J.B. Murphy Field and the addition of the varsity and junior varsity flag football and rugby teams.

As described in EIR chapter 3, section 3.A.4, and presented in **Table 3.A-1**, Annual J.B. Murphy Field Use under 2020 Baseline and Proposed Conditions, p. 3.A-6, **Table 3.A-2**, Annual Upper Practice Field Use under 2020 Baseline and Proposed Conditions, p. 3.A-7, and EIR Appendix C, Table C-1, the lighting operations plan for the St. Ignatius campus fields would allow for 370 additional daily practices including 270 additional evening practices over 2020 baseline conditions. Assuming all St. Ignatius athletic teams qualify for playoffs and tournaments, St. Ignatius would host up to 167 games at J.B. Murphy Field per school year compared to 138 games under 2020 baseline conditions, an increase of 29 spectator-attended events over 2020 baseline conditions. One of the 29 new spectator-attended events would be a varsity football championship game and the remaining 28 spectator-attended events, including varsity playoff games, would be for the new flag football and rugby teams. All flag football and rugby games would be new low-attendance events and the varsity football games (including playoffs) to be shifted from Saturday afternoons to Friday evenings would draw up to an additional 500 spectators per game with one additional varsity football playoff game accounting for one of the anticipated peak-attendance events (i.e., 2,000 spectators). The flag football and rugby teams would use the St. Ignatius campus fields for 85 new weekday practices during the fall and winter seasons, respectively. St. Ignatius would also shift existing soccer and lacrosse practices from Fairmont Field⁹ in Pacifica to the St. Ignatius campus fields.

Under 2020 baseline and proposed conditions, games are the primary generators of vehicle trips and spectator activity at the St. Ignatius campus. Games occur at scheduled times, draw spectators, and create distinct arrival and departure peaks within 30–60 minutes of the start and end of each event. Under 2020 baseline conditions, weekly games typically involve between 50–250 spectators for soccer and lacrosse, 100–400 spectators for track-and-field meets, up to 300 spectators at first-year and junior varsity football games, and up to 1,500 spectators for varsity football games. Under proposed conditions, attendance at soccer, lacrosse, first-year and junior varsity football, and track-and-field games and meets is not expected to change; up to 300 spectators are expected for flag football and rugby games; and varsity football games would draw between 500–2,000 spectators. Although St. Ignatius highlights options for use of transit, bicycling, and transportation network companies as part of its implementation of the J.B. Murphy Field Night Game or Large Event Management Plan (St. Ignatius Large Event Management Plan) for events with more

⁹ Fairmont Field is a St. Ignatius–owned athletic facility in Pacifica that provides supplemental field capacity during high-demand periods when J.B. Murphy Field and the upper practice field cannot accommodate all scheduled activities. As described in EIR chapter 2, Project Description, Fairmont Field supports approximately 340 to 420 athletic team practices annually and approximately 96 to 111 games for soccer, field hockey, baseball, softball, flag football, and rugby, with multiple practices occurring on a given day (see EIR chapter 2, Project Description, for additional information).

than 1,000 spectators¹⁰, spectators travel primarily by personal vehicle, resulting in concentrated periods of increased traffic on surrounding streets during the extended weekday p.m. peak travel period (3–7 p.m.).

In contrast, practices generate substantially fewer external trips. Weekday practices typically involve only team participants and coaches. Most student athletes travel early to campus or remain on campus between the end of practices and start of the school day and the end of the school day and the start of practice for extracurriculars, study hall, tutoring, or other on-campus activities with some driving and parking for the day and others being dropped off and picked up. As a result, weekday practices generally do not create a second inbound trip to campus. Vehicle activity associated with weekday practices is therefore limited to parent drop-offs before morning practice starts and pick-ups when afternoon practice concludes. These trips are distributed throughout the early mornings and evenings and do not result in large, concentrated arrival/departure peaks. Weekend practices and affiliated club activities function similarly. These events generate participant-only trips with very low spectator volumes, and arrival patterns are more staggered because practices start and end throughout the day.

Under the proposed project, while the total number of scheduled practices increases, the trip characteristics for practices remain largely unchanged: students are already arriving to or are on campus on weekdays, practices do not draw spectators, and weekend activities continue to generate minimal external vehicle traffic. Accordingly, even with more daily practices, the increase in actual vehicle trips associated with practices is minor compared to game-related trip generation.

Impact TR-1: The proposed project would not involve construction that would require a substantially extended duration or intensive activity that would create potentially hazardous conditions, interfere with emergency access or accessibility, or substantially delay public transit. (*Less than Significant*)

To minimize any potential construction-related transportation impacts on bicyclists, pedestrians, public transit operations, emergency access, and local traffic operations during project construction, any temporary partial closures of the public right-of-way would be coordinated with the San Francisco Municipal Transportation Agency (SFMTA) in general compliance with the San Francisco Regulations for Working in San Francisco Streets (the blue book).¹¹ The contractor would be required to coordinate with the Traffic Engineering and Transit Divisions of SFMTA, the police department, the fire department, and other construction contractor(s) for any concurrent nearby projects to manage safe access and travel to, from, and around the site during construction of the light standards and ancillary project elements.

Construction of the proposed project would be confined to the school campus and is expected to be completed within approximately three months. Construction would not require the closure of public right-of-way or alteration of any streetscapes. Additionally, all bicycle, pedestrian, and transit access to and from the project site would be maintained during the construction period as required by City requirements to minimize the impacts on bicyclists, pedestrians, public transit operations, emergency access, and local

¹⁰ St. Ignatius College Preparatory, J.B. Murphy Field Night Game or Large Event Management Plan, June 2020, [Case File No. 2018-012648ENV-02](https://resources.finalsite.net/images/v1725462872/siprep/etl8m9rdxfzcecrfjdsww/SILargeEventPlan.pdf); and St. Ignatius College Preparatory, St. Ignatius College Preparatory Management Plan for Night Games and Large Events at J.B. Murphy Field, September 2024. Available at: <https://resources.finalsite.net/images/v1725462872/siprep/etl8m9rdxfzcecrfjdsww/SILargeEventPlan.pdf>. Accessed December 2025. The St. Ignatius Large Event Management Plan consists of the June 2020 plan and the September 2024 update, which together are referenced as a compendium for purposes of this analysis. The 2024 update supplements and refines the procedures established in the 2020 plan.

¹¹ San Francisco Municipal Transportation Agency (SFMTA), Regulations for Working in San Francisco Streets, Revised February 21, 2023. Available at: <http://www.sfmta.com/bluebook>. Accessed September 23, 2025.

traffic operations. The proposed update to the school's field programming would involve no physical changes for construction other than that associated with light standards. Compliance with blue book regulations, as applicable for any temporary partial closures and concurrent projects, would ensure that any potential transportation-related construction impacts would be less than significant. Therefore, the proposed project would have a less-than-significant construction-related transportation impact. No mitigation is required.

Impact TR-2: The proposed project would not create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations. (*Less than Significant*)

2020 Baseline Conditions

Under 2020 baseline conditions, J.B. Murphy Field hosted up to 138 games, including 120 regular season games and up to 18 playoff or tournament games, and 550 practices annually. In addition, approximately 675 practices were held on the upper practice field. Attendance at most games and track-and-field meets hosted at J.B. Murphy Field was in the range of 50 to 400 spectators, except for varsity football games which generated from 500 to 1,500 spectators. Under 2020 baseline conditions up to seven varsity football games (including playoffs) were held on Saturday afternoons at 1 p.m. Attendance for varsity football games approached the higher range (1,500 spectators) up to three times per year, including playoffs.¹² These baseline activities generated periodic increases in traffic in the project vicinity in the mornings, prior to the 6 a.m. start time for practices, and in the evenings after 7:30 p.m. and 8 p.m., when lighted activities at the upper practice field ended and the portable lights used for evening practices at J.B. Murphy Field were turned off.

Temporary increases in traffic volumes occur primarily within the 30 to 60 minutes before practices and games begin and again approximately 30 to 60 minutes after practices and games end. Under 2020 baseline conditions, these temporary traffic increases were largely associated with game-related activity, as games generated the highest volume of spectators and non-student trips. Practices generated substantially fewer external trips, as most student athletes arrived at campus for morning practices and walked directly from practice to academic buildings/locker rooms or were already on campus during weekday afternoons and walked directly from academic buildings/locker rooms to practice. Apart from early morning weekday practices beginning as early as 6 a.m. which generated some parent drop-offs, weekday practices generally did not create distinct arrival peaks. For afternoon practices, students typically remained on campus after the end of the school day for athletics, tutoring, or extracurricular activities rather than leaving and returning, minimizing additional vehicle trips.

Weekend activity followed a similar pattern. Saturday practices and St. Ignatius affiliated club events generated some morning arrival trips, but spectator volumes were low and consisted primarily of participants and coaches. Games, particularly weekend football, were the primary drivers of temporary traffic increases due to higher spectator attendance and structured start and end times. Localized traffic congestion and parking disruption was particularly pronounced at the up to seven Saturday afternoon varsity football games when games were also being played at the West Sunset Soccer Fields. Accordingly, baseline traffic patterns reflected noticeable but short-duration peaks around game times, with smaller,

¹² J.B. Murphy Field may accommodate up to 2,800 standing-only spectators; however, this maximum capacity has only been reached during two events since it was constructed in 1969 and is not anticipated to occur again.

more diffuse increases associated with early morning practices and end-of-day departures from later afternoon practices.

The version of the St. Ignatius Large Event Management Plan in place under 2020 baseline conditions included measures that required St. Ignatius to contract for traffic and parking control personnel and for curbside activity monitoring for events anticipated to have more than 1,000 spectators. Implementation was intended to prevent unsafe conditions such as double parking or queue spillback and to ensure circulation remained orderly while minimizing conflicts among vehicles, pedestrians, bicyclists, and transit users. Weekday practices occurred more frequently but generated minimal external trips because most student athletes remained on campus between school and athletics; therefore, practices did not result in substantial traffic volumes. Accordingly, both the low-trip nature of routine practices, combined with the use of event-specific traffic management measures for high-attendance games, supports the conclusion that temporary traffic increases during scheduled athletic events did not result in substantial traffic hazards or impede emergency access, despite occasional localized congestion and neighborhood complaints under 2020 baseline conditions.

Proposed Conditions

The proposed project would not introduce new physical features, expand J.B. Murphy Field capacity, or change the streetscape design, parking program, or loading access. Project operations would not alter the existing street grid or change the adjacent travel lanes or transit operations for Muni routes including transit stops within the vicinity of the project site. Therefore, the transportation and circulation analysis focuses on how the proposed athletic programming changes would affect the transportation network.

EIR chapter 3, section 3.A.4, **Table 3.A-1**, p. 3.A-6, and **Table 3.A-2**, p. 3.A-7, summarize the changes in the proposed number of games as well as practices at each field compared with the 2020 baseline. Under proposed conditions, J.B. Murphy Field would host up to 29 more games (including playoffs and tournaments) compared to 2020 baseline conditions. This change reflects both a redistribution of games by time of day and a net increase in total events. Compared to 2020 baseline conditions, there would be 26 fewer daytime games, including 7 fewer Saturday daytime games, and an increase of 48 evening games in a year, including up to 8 Friday night varsity football games. In addition, J.B. Murphy Field would accommodate up to 28 new Saturday games as a result of adding rugby and flag football to the program. There would also be an increase of 370 daily practices (100 morning and afternoon practices and 270 evening practices) in a year at the St. Ignatius campus fields compared to 2020 baseline conditions with multiple practices on the same day. For J.B. Murphy Field, practices would increase by 100 in the daytime and 150 in the nighttime compared with 2020 baseline conditions. For the upper practice field, the number of daytime practices would remain the same, and there would be 120 additional evening practices. There would also be 15 evenings when the upper practice field lights would be used during a game at J.B. Murphy Field, but no games would be played on the upper practice field.

As discussed in EIR chapter 2, Project Description, and presented in EIR Appendix C, Table C-1, the proposed project's updated field programming would shift the start times for morning practices from 6 a.m. to 7 a.m., moving the associated increased vehicle volumes from between 5 a.m. and 6 a.m. under 2020 baseline conditions to between 6 a.m. and 7 a.m. Morning practice vehicle trips would still occur prior to the 7 a.m. to 9 a.m. morning peak travel period but overall traffic would be reduced during this timeframe due to fewer morning practices. Afternoon and evening practices would be scheduled to occur between 3:30 p.m. to 9:30 p.m., which would partially overlap with the 3–7 p.m. evening extended peak traffic period. Although the

proposed project would include more total practices than the 2020 baseline, weekday practices would generate minimal new vehicle trips, because, consistent with the trip characteristics described above, practices do not draw spectators and most student athletes would either travel to campus for morning practices and remain on campus to start the school day or remain on campus after the school day for afternoon and evening practices. Weekend practices and St. Ignatius affiliated club activities similarly generate low participant-only traffic with little spectator presence. As a result, the additional scheduled practices for the flag football and rugby teams, as well as the shift in practice times for existing teams under the proposed project, would primarily redistribute the existing trip-making throughout the day rather than produce substantial new peak-hour traffic. Although more trips would partially overlap with the weekday evening peak traffic period, the incremental increase in trip activity associated with new and shifted practices would be minor compared to game-related traffic.

As presented in EIR Appendix C, Table C-1, the timing of weekday games would also shift, with most games starting later and ending at 8 p.m., later than the 2020 baseline conditions when weekday games and track-and-field meets start at 3 p.m. and end by 7 p.m. The proposed project would also shift 48 weekday and weekend daytime games including football games to evenings. Up to 12 junior varsity and varsity football games would be shifted from Saturday mornings and afternoons to Friday afternoons and evenings between 3:30 p.m. and 10 p.m. The shift of the varsity football games to Friday evenings would increase baseline attendance by up to 500 spectators per game with peak-attendance events increasing from 1,500 spectators to 2,000 spectators at up to three events in a year (including one additional varsity football championship game). The timing of the associated vehicle trips would shift to Fridays before 7 p.m., prior to games, and Fridays after 10 p.m., following games. While there would be an up to 500-spectator increase per event, most of the attendance increase would be from students who would already be on the St. Ignatius campus for after-school programs and the junior varsity football games and would not result in a substantial amount of vehicle trips. The 28 new low-attendance rugby and flag football games (up to 300 spectators) would be held on Saturdays and would generate new vehicle trips throughout the weekend day between 10 a.m. and 5 p.m.

Operations for any high-attendance events (i.e., events with anticipated attendance of 1,000 to 2,000 people) at J.B. Murphy Field would follow the procedures of the St. Ignatius Large Event Management Plan.^{13, 14} The large event management plan includes measures to address a range of localized concerns including pre-event and post-event traffic management, coordination with City agencies such as the SFMTA for reserved parking along 37th Avenue between Rivera and Ortega streets, and coordination with the San Francisco Police Department (SFPD) for traffic and parking control. Following each large event, St. Ignatius conducts an after-action review, typically held during the week following the event, involving the Director of Security, Athletic Director, event security staff, and other relevant school personnel. These reviews evaluate traffic, parking, and overall event operations and identify any issues requiring corrective action. Any concerns raised by nearby residents, whether through direct contact or through the school's communications department, are reviewed as part of this process, and responses or corrective measures are communicated to the neighborhood association and, as applicable, directly to the individual raising the concern. In addition, the

¹³ The St. Ignatius Large Event Management Plan consists of the June 2020 plan and the September 2024 update, which together are referenced as a compendium for purposes of this analysis. The 2024 update supplements and refines the procedures established in the 2020 plan.

¹⁴ St. Ignatius currently operates field lighting and schedules certain practices and games pursuant to a September 2023 St. Ignatius-SINA agreement. Interim conditions allow limited evening use of J.B. Murphy Field and include restrictions on end times and the number of exception evenings per season. Traffic activity under interim conditions is similar in pattern to 2020 baseline conditions, with trip-making concentrated in short periods before and after scheduled athletic events. As required by CEQA, the transportation impact analysis evaluates the project relative to 2020 baseline conditions. Interim operating conditions presented in EIR chapter 2, Project Description, is only for informational context not for evaluation.

St. Ignatius Large Event Management Plan provides for periodic coordination with neighborhood organizations following large events, as appropriate, to discuss event operations, review feedback, and identify opportunities for operational improvements.

Under the large event management plan, St. Ignatius would provide advance notice to SFMTA and SFPD of all scheduled high-attendance events, request parking control officers and SFPD officers to manage traffic at key intersections, and implement temporary circulation controls, including:

- Street closures and staging lanes on 37th Avenue between Ortega and Pacheco streets, where two travel lanes (and a third lane when curb space is available) are used for vehicle staging and managed entry;
- Placement of steel barricades and “NO ENTRY” signage at Sunset Boulevard intersections at Pacheco and Quintara streets to deter cut-through traffic;
- SFPD officer deployment and marked vehicles at Sunset Boulevard and at 37th Avenue intersections to enforce closures, direct turning movements, and manage vehicle ingress and egress;
- Security agents positioned along the staging route and pedestrian corridors to guide vehicles, manage street parking, monitor curbside loading, and support pedestrian safety;
- A designated rideshare drop-off/pick-up zone on Rivera Street between 37th Avenue and the 38th Avenue garage entrance, coordinated with SFMTA and publicized on event materials;
- Parking management protocols directing event-goers southbound on 37th Avenue from Ortega Street, with security agents actively coordinating on-street parking for approximately 300 vehicles along the campus frontage.

These coordination measures would apply to all events with 1,000 or more spectators, such as varsity football regular season and playoff games including the one additional peak-attendance varsity football championship game, ensuring that traffic control, parking management, and pedestrian circulation remain consistent with the operational procedures established under 2020 baseline conditions.

As previously stated, the proposed project would not include physical changes to the local roadway network or site access that could create potentially hazardous conditions for people walking, bicycling, driving, or public transit operations. Furthermore, none of the roadways providing access to the project site, including 37th Avenue, Rivera Street, Ortega Street, and Sunset Boulevard, are designated on San Francisco’s Vision Zero High Injury Network. Under the updated field programming, project operations would result in an increase in evening events compared to 2020 baseline conditions; however, as described above, these additional events would not generate a substantial number of new trips, especially not vehicle trips. Weekday practices generate minimal new vehicle trips for the reasons discussed above, and weekend practices and St. Ignatius affiliated club activities also draw little spectator traffic. Although the project would shift 48 daytime athletic events to evenings, would add 28 new Saturday rugby and flag football games, and potentially host one additional high-attendance event (i.e., a varsity football championship game), most of the attendance associated with these events would consist of students who would already be on campus, resulting in limited external trip generation. For evening games with more than 1,000 spectators, St. Ignatius would implement measures from the St. Ignatius Large Event Management Plan such as use of traffic control personnel and curbside management to maintain safe circulation conditions. Collectively, these factors demonstrate that although the project would incrementally increase vehicle trips on the local network at different times of the day and different days of the week, it would not create or exacerbate potentially hazardous conditions for people walking, bicycling, or driving or for public transit operations

compared with baseline circulation patterns. Therefore, project impacts related to creation of potentially hazardous conditions would be less than significant. No mitigation is required.

Impact TR-3: The proposed project would not interfere with the accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access. (Less than Significant)

As discussed above in Impact TR-2, project implementation would not alter the established street grid, permanently close any streets or sidewalks, or eliminate or reconfigure any transit or bicycle routes. The proposed project would not expand J.B. Murphy Field capacity or include physical features that would inhibit emergency access to the site. The proposed project would not result in a substantial increase in vehicle trips to or from the site.

Under 2020 baseline conditions, J.B. Murphy Field hosted 120 games pre-season and regular season games; 18 playoff games, if needed; and 550 practices annually. Approximately 675 practices were held on the upper practice field. J.B. Murphy Field hosted five regular varsity season football games on Saturday afternoons with the potential for up to two playoff games per year. These games attracted an audience ranging from 500 to 1,500 spectators. Attendance at all other varsity and lower-level games and track-and-field meets ranged from 50 to 400 spectators. These baseline activities already result in temporary increases in traffic and circulation activity on surrounding streets during pre-event arrival and post-event departure periods.

As described above under Impact TR-2, the proposed project would shift morning practices during the school year to later morning, afternoon, and evening times; shift weekday game start times to later in the day; and reschedule up to 12 junior varsity and varsity football games from Saturday mornings and afternoons to Friday afternoons and evenings. In addition, the new rugby and flag football teams would hold their games on weekday afternoons and weekends. Under proposed conditions, the number of peak-attendance varsity football games would increase compared to 2020 baseline conditions, with up to three games per year drawing approximately 2,000 spectators, including the possibility of an additional varsity football championship game. In addition, shifting football games to Friday evenings is expected to increase attendance by up to 500 spectators.

The shift in daily traffic patterns and the limited, and various, increases in peak vehicle traffic, including for 29 new games (including playoffs), that would result from the proposed project would not be substantial. Pursuant to the project's conditional use authorization, St. Ignatius would continue to implement its St. Ignatius Large Event Management Plan. This would be implemented for evening games and events with 1,000 or more spectators, i.e., high-attendance events, which includes contracting with traffic control personnel and parking control officers and coordination with City agencies (e.g., SFMTA reserved parking on 37th Avenue, SFPD traffic control, and traffic management staff) to maintain safe and orderly conditions for vehicles, pedestrians, bicyclists, and transit. As part of this plan, St. Ignatius would provide advance notice to SFMTA and SFPD, reserve curb space on 37th Avenue between Rivera and Ortega streets for event parking and staging, and request parking control officers and SFPD officers to manage traffic at key intersections. Temporary circulation controls such as directional restrictions on 37th Avenue, the placement of barricades at Sunset Boulevard and adjacent cross streets and monitored pedestrian crossing points would be implemented to ensure traffic moves efficiently and does not impede Muni operations. Event staff and security agents would also manage curbside loading zones, rideshare pick-up and drop-off areas, and pedestrian flow along the 37th Avenue and Rivera Street frontages. These measures would ensure that

accessibility to the site and adjoining areas is maintained during events. The large event management plan includes feedback mechanisms to identify issues and make improvements, as needed. Additionally, the proposed project would not reconfigure, or conflict with, existing bicycle and transit facilities. The surrounding street network serving the project area accommodates the movement of emergency vehicles that travel to and through the area; emergency vehicles would continue to be able to access the project site. Impacts to accessibility would be less than significant. No mitigation is required.

Impact TR-4: The proposed project would not substantially delay public transit. (*Less than Significant*)

Public transit serving the project site includes several Muni bus routes, such as the 29-Sunset operating along Sunset Boulevard immediately east of the campus with stops at Rivera and Quintara streets, the 48 -Quintara/24th Street operating along 39th Avenue immediately west of the campus with stops at 39th Avenue and Rivera Street and 39th Avenue and Quintara Street, and the 66-Quintara which is within seven blocks along 30th Avenue. The L-Taraval light rail line is located two blocks south of the campus. These services provide frequent east-west and north-south transit connections through the neighborhood.

Under 2020 baseline conditions, athletic events at J.B. Murphy Field attracted between 50 and 1,500 spectators, depending on the type of event. In general, football games had the most spectators (up to 1,500 spectators). These events generated temporary increases in vehicle trips on surrounding streets during the pre-event arrival period (about 30 to 60 minutes before games began at 1 p.m. on Saturdays) and post-event departure period (about 30 to 60 minutes after games ended at 3:30 p.m. on Saturdays). On weekdays, most games and track-and-field meets began at 3 p.m. and ended at 7 p.m. As discussed in Impact TR-2, while increased local traffic volumes occur for a limited time prior to and after games, they do not result in substantial delays to Muni transit operations serving Sunset Boulevard, Taraval Street, or surrounding neighborhood streets because (1) student attendees are already on campus, (2) the increased traffic is localized to the immediate blocks around the school, (3) for large events increased traffic is managed in accordance with the St. Ignatius Large Event Management Plan, and (4) occurs outside core Muni peak periods (for most events). Any transit delays that occur are minor and temporary.

Under proposed conditions, field use for morning practices would be moved forward one hour from the current baseline (from 6 a.m. to 7 a.m.), with some practices shifted to afternoons and evenings. Five junior varsity football games would be shifted from Saturday morning to Friday afternoon and up to seven varsity football games would be shifted from Saturday afternoon to Friday evening. Due to the Saturday-to-Friday shift, attendance at football games could increase by up to 500 spectators, and peak attendance is anticipated to reach 2,000 spectators for up to three Friday evening football games in a season, including the one additional varsity football championship game. Under proposed conditions, other weekday varsity games, such as soccer and lacrosse, would also shift to later start times (generally 6–8 p.m.), while junior varsity games would remain in the afternoon. First-year football games would shift from Fridays 3:30 p.m. to 6 p.m. to Saturdays 10 a.m. to 12:30 p.m. There would be no change to first-year soccer game start times. New athletic teams for rugby and flag football would hold their games (up to 28 events with up to 300 spectators) on weekdays and Saturdays. Additional detail on proposed athletic game times is provided in EIR chapter 2, Project Description, and is shown in EIR Appendix C, Table C-1.

Peak traffic conditions on roadways in the area occur between 4:30 p.m. and 6:30 p.m. Monday through Friday¹⁵, with the peak hour occurring from 5–6 p.m. The proposed project would generate new vehicle trips over 2020 baseline conditions due primarily to the introduction of two new sports to the athletic program. Trips related to flag football and rugby games would occur on weekdays and Saturdays and would have up to 300 spectators. As these are low-attendance events, vehicle trips associated with these games would not be substantial and would not adversely affect transit operations. In addition, flag football practices would be held on weekdays from 7 a.m. to 8:30 a.m., and rugby practices would be held on weekdays from 3–9 p.m. As described above, these would not result in new vehicle trips just a shift in timing as students would be traveling to and from school regardless of practices. Thus, early morning trips associated with flag football practices would occur before the a.m. peak hour and similarly most late afternoon and evening rugby practice trips would occur outside of the p.m. peak hour. Therefore, these trips would not substantially delay public transit.

Under proposed conditions, varsity and junior varsity football games would shift from Saturday afternoons to Fridays. Varsity games would begin at 7 p.m. and are expected to generate peak arrival activity during the hour prior to kickoff (6–7 p.m.), which would not overlap with the p.m. peak hour (5–6 p.m.) on area roadways. Similarly, junior varsity games held from 3:30 p.m. to 6 p.m. would generate peak departure activity during the hour after the game (6–7 p.m.), which also would not overlap with the p.m. peak hour. For these reasons, the shifts in the day and time of football games would not adversely affect transit operations or result in a significant impact.

The one additional varsity football game over 2020 baseline conditions is conservatively assumed to be a championship game resulting in peak game attendance that could be up to 2,000 spectators, 500 attendees more than under 2020 baseline conditions. Many of the anticipated spectators for the up to eight regular season and playoff varsity football games (including one additional varsity football championship game) that would start at 7 p.m. would be students who would already be on the St. Ignatius campus for after-school programs and/or would be spectators at the junior varsity games, which would start at 3:30 p.m. Thus, the vehicle trips that would shift from Saturday afternoon to Friday evening, including the anticipated 500-spectator increase over the 2020 baseline, and the additional peak-attendance varsity football championship game would occur on the local street network from 6–7 p.m., which is at the end of the extended peak period but outside the peak hour timeframe of 5–6 p.m. Due to their occurrence at the end of the peak period, these shifted and incrementally increased trips would not substantially delay local transit service and would be temporary since only a small subset of events, on average, approximately three events per year, would generate attendance levels approaching 2,000 spectators.

For Muni service operating along Sunset Boulevard, Taraval Street, and adjacent neighborhood streets, roadways during the post-peak period exhibit lower background vehicular travel and shorter queues, allowing buses to maintain scheduled speeds with minimal delay. In addition, for high-attendance events (i.e., over 1,000 spectators), the St. Ignatius Large Event Management Plan requires coordination with SFMTA and SFPD, including traffic and parking circulation procedures, reserved on-street and off-street parking areas, onsite traffic and parking control by traffic and parking control personnel, and staffing to monitor curbside activity. Implementation of these measures would ensure that traffic associated with high-attendance events would not result in significant delays to Muni transit operations. Localized increases in

¹⁵ San Francisco Planning Department. 2019. Transportation Impact Analysis Guidelines. The weekday extended p.m. peak period is 3 p.m. to 7 p.m. The traditional weekday p.m. peak period without shoulders is 4:30 p.m. to 6:30 p.m. Available at: https://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf. Accessed September 26, 2025.

event-related vehicle activity, including high-attendance events, typically dissipate within about one hour before and after events. With implementation of measures outlined in the St. Ignatius Large Event Management Plan for the limited number of annual events with more than 1,000 spectators (e.g., varsity football games), vehicle volume increases on the local street network would not result in sustained queuing at intersections or bus stops and would not substantially interfere with transit travel times or stop operations. Overall, impacts to delay of public transit resulting from the proposed project would be less than significant. No mitigation is required.

Impact TR-5: The proposed project would not cause substantial additional vehicle miles traveled or substantially induce additional automobile travel. (*Less than Significant*)

CEQA statute and CEQA guidelines identify vehicle miles traveled (VMT) efficiency metrics as potential metrics to evaluate transportation impacts. VMT per person (or per capita) is a measurement of the amount and distance that a resident, an employee, or a visitor drives, accounting for the number of passengers within a vehicle. In general, high VMT areas are associated with more air pollution, including greenhouse gas (GHG) emissions and energy use, than low VMT areas. Many interdependent factors affect the amount and distance a person may drive. In particular, the built environment affects how many places a person can access within a given distance, time, and cost, using different means of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development at great distances from other land uses and in areas with few options for means of travel provides less access than locations with high density, mix of land uses, and numerous means of travel. Therefore, low-density development typically generates more VMT compared to a similarly sized development in urban areas, such as the project site.

Given these travel behavior factors, on average, people living or working in San Francisco contribute to lower VMT per person than people living or working elsewhere in the nine-county San Francisco Bay Area region. In addition, on average, persons living or working in some areas of San Francisco result in lower amounts of VMT per person than persons living or working elsewhere in San Francisco. The City displays different amounts of VMT per capita geographically through transportation analysis zones.¹⁶

The proposed project would not expand J.B. Murphy Field capacity or alter the street network except on a temporary basis to manage large events (e.g., varsity football games with more than 1,000 spectators) pursuant to the St. Ignatius Large Event Management Plan. With field lighting, St. Ignatius would shift the timing of field use from early morning practices to later start times in the morning and to afternoons and evenings, shift the start time for games to later start times with more evening games, and shift the timing of up to 12 junior varsity and varsity football games from Saturday morning and afternoon to Friday afternoon and evening. Compared to 2020 baseline conditions, the proposed project would increase the total number of daily practices conducted annually by 370 and athletic games/meets by 29. This would include approximately 85 additional practices and 28 additional regular season and playoff games each year for the new varsity and junior varsity rugby and flag football teams, as well as one additional varsity football playoff game per season if St. Ignatius qualifies for the league championship. Soccer and lacrosse practices may also be shifted from Fairmont Field to the St. Ignatius campus fields.

¹⁶ Planners use these zones as part of transportation planning models for transportation analyses and other planning purposes. The zones vary in size from single city blocks in the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas such as the Hunters Point Shipyard area.

The 2019 City of San Francisco Transportation Impact Analysis Guidelines uses a map-based VMT screening criteria consistent with the Office of Land Use and Climate Innovation (LCI) Technical Advisory¹⁷ guidelines to determine whether a proposed project is located in an area with a low VMT efficiency metric.¹⁸ The project site is located within a transit priority area and within traffic analysis zone (TAZ) 496, which has an existing VMT per retail employee of 7.83 that is below the regional VMT per retail employee minus 15 percent threshold of 12.7.¹⁹ Although the proposed project is not a residential, office, or retail use, the planning department treats changes to athletic field use programming as similar in nature to grocery stores, local-serving entertainment venues, religious institutions, parks, and athletic clubs, which are considered “retail” for VMT screening purposes because these uses attract short local trips. The proposed project’s updated field programming is operationally similar to these local-serving community uses, and therefore the retail screening context is appropriate for considering the project’s VMT potential. In addition, the 2018 LCI Technical Advisory guidelines consider projects within one-half mile of a of an existing major transit stop to generally have a less than significant impact on VMT unless the project: (1) would have a floor area ratio (FAR)²⁰ exceeding 0.75; (2) includes more parking for use by residents, customers or employees than required by the jurisdiction; or (3) is inconsistent with the applicable Sustainable Community Strategy.²¹

The department’s guidance indicates that ‘office’ should be a proxy for childcare facilities, K-12 schools, post-secondary institutional (non-student housing), medical, and production, distribution, and repair (PDR) land uses. However, for the reasons stated above, the characteristics of the new vehicle trips associated with athletic field programming are operationally more similar to local-serving community uses, and therefore the retail VMT screening threshold is more appropriate for this project. Regardless, although the project site TAZ does not meet the map-based VMT screening for office use and the project would result in an incremental increase in VMT, the increase in VMT would not be substantial. As noted in EIR chapter 2, Project Description, approximately 63 percent of students attending St. Ignatius College Preparatory reside within San Francisco²², with the remaining student population primarily originating from nearby counties within the Bay Area. Therefore, new vehicle trips associated with increased attendance at football games, the addition of flag football and rugby teams, the switch to Friday night football games instead of Saturday afternoons, and increase use of St. Ignatius campus fields instead of Fairmont Field in Pacifica would be limited, as many spectators would already be on campus or traveling from within San Francisco, and trips to Fairmont Field in Pacifica would decrease.

The project site is located within one-half mile of a major transit stop and is served by north–south and east–west transit routes with stops within one block of the school campus. The proposed project would not

¹⁷ California Governor’s Office of Land Use and Climate Innovation, Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018. Available at: https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdfhttps://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf. Accessed September 23, 2025.

¹⁸ San Francisco Planning. 2019. Transportation Impact Analysis Guidelines. Available at: https://files.sfplanning.org/documents/environmental/Transportation_Impact_Analysis_Guidelines-October2019.pdf. Accessed September 23, 2025.

¹⁹ San Francisco Planning Department, Transportation Information Map and Database, 2001 37th Avenue. Available at: <https://sfplanninggis.org/tim/>. Accessed September 29, 2025.

²⁰ Floor area ratio (FAR) is the ratio of a building’s total floor area to the size of the parcel on which it is located.”

²¹ California Governor’s Office of Land Use and Climate Innovation, December 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. Available at: https://lci.ca.gov/docs/20190122-743_Technical_Advisory.pdf. Accessed September 23, 2025.

²² Stupi, Ken, St. Ignatius College Preparatory, email correspondence, February 4, 2026. Approximately 63 percent of students who attend St. Ignatius are from San Francisco. The remainder are from nearby Bay Area counties.

generate an increase in FAR, would not add parking, and would not conflict with Plan Bay Area 2050.²³ Under the 2018 LCI Technical Advisory²⁴ guidelines for redevelopment projects, the proposed project would primarily adjust the timing of existing practices and games shifting baseline VMT, and it would introduce new VMT-generating events, i.e., 29 new athletic games and 370 practices as discussed in Impact TR-2.

While the project would shift up to 12 football games from Saturdays to Fridays, which may incrementally increase attendance by up to approximately 500 spectators per game, most attendees would be St. Ignatius students already on campus for after-school programs or junior varsity games. The additional varsity football playoff game that could be hosted at J.B. Murphy Field, should St. Ignatius qualify for the league championship, would constitute one of the three anticipated peak-attendance events (approximately 2,000 spectators) per year and would be a new event compared to 2020 baseline conditions. As discussed above, the St. Ignatius Large Event Management Plan would continue to be implemented for high-attendance events (1,000 spectators). This plan includes measures to reduce single-occupancy vehicle travel, such as advance communication to students and families encouraging carpooling, transit use, and shared-ride options.

The 28 new rugby and flag football games, which would generate 50 to 300 spectators per event, would occur on weekday afternoons and Saturdays. Attendance and VMT for these games would be greater than under 2020 baseline conditions when varsity and junior varsity rugby and flag football games did not occur. Practices for the new teams would occur on weekdays and would not result in new trips/VMT as student athletes would arrive on campus earlier for morning practices or leave later due to afternoon/early evening practices.

In addition, the project site is located at the edge of the Sunset Corridors priority development area²⁵ as defined in Plan Bay Area 2050 indicating that the St. Ignatius school campus is located in an urbanized area served by public transit with proximity to jobs, good schools, and other urban resources. Additionally, the proposed project is not a transportation project and would not include roadway improvements, parking expansions, or other transportation features that could induce additional automobile travel. The project would not conflict with Plan Bay Area 2050. As described in Impact TR-2, weekday practices would generate minimal external trips because participants would already be on campus, weekend practices would draw limited spectator activity, and only a small subset of athletic events would generate notable vehicle trips, i.e., varsity football games. Thus, while the updated field use program would shift the timing of existing practices and games and accommodate up to 370 additional practices and 29 regular season and playoff games, it would not substantially increase vehicle trips or result in a substantial net increase in VMT. Impacts related to VMT would therefore be less than significant, and no mitigation is required.

²³ Metropolitan Transportation Commission and Association of Bay Area Governments, Plan Bay Area 2050, October 2021. Available at: <https://planbayarea.org/plan-bay-area-2050>. Accessed December 2025.

²⁴ California Governor's Office of Land Use and Climate Innovation, December 2018. Technical Advisory on Evaluating Transportation Impacts in CEQA. Available at: https://lci.ca.gov/ceqa/docs/20190122-743_Technical_Advisory.pdf. Accessed December 2025.

²⁵ Metropolitan Transportation Commission, Geographic Information Systems, Priority Development Areas (Plan Bay Area 2050). Available at: <https://opendata.mtc.ca.gov/datasets/MTC::priority-development-areas-plan-bay-area-2050/explore?location=37.756199%2C-122.479654%2C13.00>. Accessed December 2025.

Impact TR-6: The proposed project would not result in a loading deficit and the secondary effects would not create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit. (*Less than Significant*)

The proposed project would not alter or eliminate any loading zones, and operations would not be substantially different for practices or events as compared to 2020 baseline conditions. Consistent with the City's Transportation Impact Analysis Guidelines, a significant loading impact would occur if a project created new passenger or commercial loading demand that could not be accommodated onsite or in the immediate vicinity and its secondary impacts would create potentially hazardous conditions.

Under both 2020 baseline and proposed conditions, St. Ignatius's drop-off, pick-up, and parking activities are governed by the St. Ignatius Traffic and Parking Plan.²⁶ Passenger loading occurs during daily school operations through designated curb space along 37th Avenue with a 150-foot-long white zone at the north end of 37th Avenue near Pacheco Street and a 100-foot-long white zone at the south end of 37th Avenue near Rivera Street. The proposed project would not change daily passenger loading operations. Commercial loading for school operations (e.g., deliveries, maintenance vehicles) occurs in established service areas on the campus and would also not be affected by the project.

Compared to 2020 baseline conditions, the proposed project would increase the total number of daily practices by 370 and athletic games/meets by 29 annually. This would include approximately 85 additional practices and 28 additional regular season and playoff games each year for the new varsity and junior varsity rugby and flag football teams, as well as one additional varsity football playoff game per season if St. Ignatius qualifies for the league championship. Soccer and lacrosse practices may also be shifted from Fairmont Field in Pacifica to the St. Ignatius campus fields. The proposed project would not expand J.B. Murphy Field capacity; however, event attendance would change incrementally with up to 500 additional spectators at football games because of the shift, including one additional peak-attendance event (2,000 spectators). Thus, the shift to evening games and addition of new games is anticipated to increase attendance compared to 2020 baseline conditions. As previously discussed, most of the attendance increase would be attributable to students who would already be on the St. Ignatius campus for after-school programs and the junior varsity football games.

During events at J.B. Murphy Field, passenger loading occurs when spectators are dropped off and picked up in the surrounding neighborhood, which temporarily increases curb activity before and after games. These baseline activities already generate temporary increases in passenger loading demand, typically in the hour before and after an event. For any large event at which there would be 1,000 spectators or more, passenger loading is managed through the St. Ignatius Large Event Management Plan, which includes security and traffic control personnel and coordination with SFMTA and SFPD to manage circulation and curbside conditions.

As discussed in Impact TR-2, passenger loading during events is managed pursuant to the St. Ignatius Large Event Management Plan. St. Ignatius maintains two designated white curb passenger loading zones along 37th Avenue for daily school drop-off and pick-up operations, a 150-foot-long white zone at the north end of 37th Avenue near Pacheco Street, and a 100-foot-long white zone at the south end near Rivera Street. For large events, patrons arriving by car are directed to follow the school's regular daily drop-off circulation

²⁶ St. Ignatius College Preparatory, St. Ignatius Traffic and Parking Plan. Available at: <https://families.siprep.org/daily-life/security/drop-off-pickup-parking>. Accessed December 2025.

procedures, using only the southbound lanes on 37th Avenue between Quintara and Rivera Streets. In addition, rideshare services are encouraged, and a designated rideshare drop-off site is established on the southbound side of 37th Avenue north of Quintara Street.

During high-attendance events at J.B. Murphy Field (about three times per year), SFMTA posts temporary parking restrictions on portions of 37th Avenue to expand available curbside space, and traffic control personnel are deployed to manage loading activity. These measures ensure that loading supply is sufficient during events and that activity remains orderly. The St. Ignatius Large Event Management Plan further reduces potentially hazardous conditions from any secondary impacts by requiring coordination with SFMTA and SFPD to prevent double parking, blocking driveways, or queuing to maintain emergency access routes and avoid delays to Muni transit operations.

Consistent with the City's Transportation Impact Analysis Guidelines, the project would not generate new commercial loading demand beyond 2020 baseline conditions; however, passenger loading demand could increase as a result of up to 29 new games (28 low-attendance games and one peak-attendance event). Passenger loading for spectators and student pick-up/drop-off would continue to occur primarily along 37th Avenue before and after events, and these temporary increases are already managed through the St. Ignatius Large Event Management Plan with traffic control and curbside monitoring. Although varsity football games may experience higher spectator attendance under the proposed project, these events occur only a few times per year and continue to be accommodated within the capacity of existing curbside loading space. These limited high-attendance events are actively managed through the St. Ignatius Large Event Management Plan, which includes coordination with SFMTA and SFPD, deployment of traffic control personnel, designated pick-up and drop-off zones, and curbside monitoring. As part of this coordination, SFMTA would continue to post temporary parking restrictions on portions of 37th Avenue during high-attendance events to expand available curbside space and facilitate efficient loading activity.

Overall, commercial loading demand for school operations would continue to occur in designated on-campus areas and would not be affected by the project. While high-attendance events may result in a temporary incremental increase in passenger loading demand, this activity would be accommodated within existing curbside space along 37th Avenue and managed pursuant to the St. Ignatius Large Event Management Plan such that no potentially hazardous conditions for pedestrians, bicyclists, or drivers would occur. Therefore, the proposed project's impact on loading would be less than significant and would not result in hazardous conditions for people walking, bicycling, or driving; or substantially delays to public transit. No mitigation is required.

Impact TR-7: The proposed project would not result in a substantial vehicular parking deficit and the secondary effects would not create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit. (*Less than Significant*)

According to City's Transportation Impact Analysis Guidelines, parking by itself, does not represent a significant impact. Instead, the department assesses whether a parking deficit could occur using the map-based VMT screening criteria.²⁷ If a project meets the screening criteria, then a substantial parking deficit would not occur, and the project would not require parking analysis. Nearly all projects located within San

²⁷ San Francisco's transportation analysis guidelines for environmental review are located at: <https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines>. Accessed September 23, 2025.

Francisco are located within transit priority areas and would not require a parking analysis under CEQA. For the purposes of map-based VMT screening, the retail land use is used as a proxy for the updated field use programming due to similar trip-making characteristics, consistent with the planning department's guidance that local-serving land uses, such as grocery stores, local-serving entertainment venues, religious institutions, parks, and athletic clubs, should be considered as retail for VMT screening. The project site is located within the map-based screening area for retail in TAZ 496, which has an existing VMT per retail employee of 7.83, well below the regional VMT per retail employee minus 15 percent threshold of 12.7.²⁸ Future VMT per capita per retail employee is 9.09. Since the existing VMT per retail employee in TAZ 496 is 7.83 and future VMT per retail employee is 9.09 both fall below the screening criteria threshold for further analysis.

The existing on-campus parking supply consists of 86 spaces, including 16 spaces with electric vehicle chargers, in the south parking garage. On-street parking is available along 37th and 39th avenues and along Rivera and Ortega streets. Under proposed conditions, the project would increase the total number of practices and athletic games/meets as compared to 2020 baseline conditions. These changes affect parking demand differently depending on event type. Under 2020 baseline conditions, practices generated minimal parking demand because most student participants remain on campus and practices do not draw spectators. Junior varsity and lower-level games generated modest parking demand because attendance for these events was low. Peak parking demand occurred primarily for varsity football games, which were the highest-attendance events on campus.

Under the proposed project, additional practices (85) and games (28) associated with the flag football and rugby team additions would generate minimal and modest parking demand, respectively, for the same reasons: (1) student participants would already be on campus and (2) event attendance would be low. However, shifting varsity football games to Friday evenings could incrementally increase peak attendance by up to approximately 500 spectators and would introduce one additional peak-attendance event (2,000 spectators), namely a potential varsity football championship game.

On weekdays, most athletic games and track-and-field meets would typically begin between approximately 3 p.m. and 5 p.m. and conclude between approximately 6 p.m. and 8 p.m. On Friday nights, select higher-attendance events—such as varsity football games and, as applicable, varsity soccer and varsity lacrosse playoff or tournament games—may occur between approximately 7 p.m. and 10 p.m. On weekends, games would typically occur on Saturdays between approximately 10 a.m. and 5 p.m., with no Sunday games under the proposed field use program. Peak parking demand during high-attendance events on Friday evenings would occur in two short windows, approximately 30 to 60 minutes before kickoff at 7 p.m. and 30 to 60 minutes after the event and may result in temporary circulation by spectators searching for parking prior to 7 p.m. start. However, for large events these conditions would continue to be managed under the St. Ignatius Large Event Management Plan, which includes use of traffic and parking control and security personnel; advanced communication encouraging carpooling, bicycling, rideshare, and transit use; and coordination of available off-street parking resources such as reserved parking at the A.P. Giannini

²⁸ OPR has not established VMT screening criteria for land uses other than residential, retail, office, and small projects. For other land uses including childcare facilities, K-12 schools, post-secondary institutional uses, and medical facilities, the City's Transportation Impact Analysis Guidelines direct agencies to treat such uses as office for VMT screening. However, as noted in Impact TR-5, the City also treats certain local-serving community uses (e.g., grocery stores, entertainment venues, religious institutions, parks, athletic clubs) as retail for map-based screening. Due to the fact that the proposed project functions similarly to these local-serving uses, the retail screening threshold is applied.

Middle School for 250-300 vehicles to reduce double parking, driveway blockages, and other temporary circulation conflicts.

The City's Transportation Impact Analysis Guidelines identify a CEQA screening threshold for parking impacts as the removal of 600 or more parking spaces. The proposed project would not remove any onsite or on-street parking, and even the highest-attendance events would generate parking demand well below the equivalent of 600 spaces. Parking demand for all other athletic events, including soccer, lacrosse, rugby, and flag football games, would remain comparable to 2020 baseline conditions. Therefore, the project would not result in a substantial parking deficit.

Parking demand associated with the shift of football games to Friday evenings, including one additional large-attendance event, would be managed through the St. Ignatius Large Event Management Plan. The Plan includes coordination with SFPD for temporary road closures and with SFMTA for reserved on-street parking on 37th Avenue, deployment of traffic control personnel, monitoring for double parking and queuing, and communication to students and families encouraging carpooling, ridesharing, and transit use. These measures would ensure that parking activity remains orderly and would not create hazardous conditions for pedestrians, bicyclists, drivers, or transit users.

For the reasons described above, the project would not result in a substantial parking deficit or hazardous conditions. The impact would be less than significant. No mitigation is required.

Impact C-TR-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on transportation and circulation. (*Less than Significant*)

The only cumulative project within 0.25 mile of the project site is the St. Ignatius Building Expansion Project, which includes the demolition of five buildings and the construction of a new addition for the school. This expansion would occur within the existing boundaries of the St. Ignatius school campus. The cumulative project would not increase enrollment or school staff. The cumulative project does not propose any streetscape modifications and the existing vehicular access to the campus would remain the same. Loading would remain at the northern end of campus, and the cumulative project would provide one off-street loading space. The cumulative project would remove 21 parking spaces, but no on-street parking spaces would be removed.

The approximately 21 parking spaces proposed for removal are located off-street within the St. Ignatius campus and are not relied upon for daily long-term parking associated with routine school operations. These spaces were previously used primarily by Jesuit priests residing in the on-campus Jesuit Residence (typically 8 to 12 spaces), with the remaining 4 to 8 spaces used by staff on weekdays. Since that time, these users have been fully accommodated elsewhere on campus. Six of the former users now park in designated spaces within the campus parking garage, and 12 of the 14 Jesuit-assigned spaces are no longer needed due to reassignment, relocation, or departure of those residents. The remaining three users (two Jesuits and one visitor) now utilize available on-street parking or unassigned parking garage spaces.²⁹

Weekday practices generate minimal external parking demand because participants are already on campus during school hours. During large-attendance events, parking demand is managed pursuant to the

²⁹ Stupi, Ken, *St. Ignatius College Preparatory*, email correspondence, February 24, 2026.

St. Ignatius Large Event Management Plan, including use of existing on-street parking and available offsite parking resources such as reserved parking at A.P. Giannini Middle School. As a result, the removal of these off-street parking spaces would not result in a substantial parking deficit in the surrounding neighborhood.

Construction activities for both the proposed project and St. Ignatius Building Expansion Project would be confined to the St. Ignatius campus and would be subject to standard construction management requirements in general compliance with the blue book to maintain emergency access, protect pedestrian and bicycle routes, and coordinate with City agencies for temporary curb and lane closures. Since construction of the projects would not overlap there would be no cumulative construction-related transportation impacts associated with potentially hazardous conditions, interference with emergency access or accessibility, or substantial delays to public transit.

With respect to hazardous circulation conditions under long-term operations, the cumulative project would not add new vehicle trips or modify circulation patterns, as student enrollment and staffing remain unchanged. Although approximately 21 off-street parking spaces that were previously used by on-campus residents and a small number of staff would be removed, these spaces are not relied upon during peak arrival or departure periods and their removal would not affect vehicular access or circulation along adjacent streets. Large events with more than 1,000 attendees would continue to be managed under the St. Ignatius Large Event Management Plan. As a result, neither project, individually or together, would create potentially hazardous circulation conditions for people walking, bicycling, and driving, or restrict multimodal access as a result of long-term operations.

Regarding accessibility, both projects would retain existing pedestrian and bicycle facilities, sidewalks, crosswalks, and transit stops, and neither project would introduce new obstructions or conflicts with ADA paths of travel. For high-attendance events with 1,000 or more attendees, event-related circulation for all travel modes would continue to be managed under the St. Ignatius Large Event Management Plan. Emergency vehicle access would also be maintained under cumulative conditions through existing access points and traffic management measures, and neither project would restrict emergency response routes or response times. Accordingly, the proposed project, in combination with cumulative projects, would not interfere with pedestrian, bicycle, transit, or emergency vehicle access, and cumulative transportation impacts related to accessibility would be less than significant. Therefore, cumulative conditions would continue to provide safe and accessible circulation for all modes.

As stated above, the school addition would not result in expanded enrollment or additional staff and therefore would not generate new trips or alter circulation patterns in the vicinity. Although approximately 21 off-street parking spaces would be removed, these spaces were used by on-campus residents and a small number of staff, are not relied upon during peak arrival or departure periods, and their removal would not affect vehicular access or circulation along adjacent streets. Transit operations on Sunset Boulevard, Taraval Street, and nearby neighborhood streets would not be delayed, as the cumulative project would not add trips that could combine with the project's incremental increase. Accordingly, the two projects together would not cause substantial delay to Muni operations.

The project site is located within TAZ 496, which meets the map-based screening threshold (existing and future 2050 regional VMT per retail employee minus 15 percent).³⁰ As discussed in Impact TR-5 and Impact TR-7, the proposed project would not result in substantial additional VMT. The St. Ignatius Building Expansion Project would not increase student enrollment or staffing. Therefore, under cumulative conditions, neither project would introduce substantial additional VMT. Therefore, neither project would result in a cumulatively considerable increase in vehicle trips resulting in substantially increased VMT.

Passenger loading activity would continue to occur in designated areas of the campus, and both projects would remain subject to the St. Ignatius Traffic and Parking Plan that governs daily drop-off, pick-up and parking. As noted above, passenger loading demand associated with high-attendance events (1,000 spectators) would be managed through the St. Ignatius Large Event Management Plan. The proposed project in combination with the cumulative project would not result in passenger loading demand that would create potentially hazardous conditions for people walking, bicycling, or driving or substantially delay transit. The proposed project, in combination with the St. Ignatius Building Expansion Project, would also not generate additional freight loading demand because neither project increases student enrollment, staffing levels, or on-campus commercial activity that would require additional loading capacity. As a result, cumulative commercial loading demand during peak periods would be similar to 2020 baseline conditions and would not result in a significant cumulative loading impact.

Therefore, the proposed project, in combination with the St. Ignatius Building Expansion Project, would not result in significant transportation and circulation cumulative impacts. No mitigation is required.

6. Noise

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

³⁰ San Francisco Planning Department, Transportation Information Map and Database, 2001 37th Avenue. The future 2050 VMT per retail employee of 9.09 would be below the regional VMT per retail employee minus 15 percent threshold of 13.3. Available at: <https://sfplanninggis.org/tim/>. Accessed September 29, 2025.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
c) For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not within an area covered by an airport land use plan or within two miles of a public airport or a public use airport. Therefore, topic E.6(c) is not applicable.

Impact NO-1: Construction of the proposed project would not generate a substantial temporary increase in ambient noise levels in excess of the Noise Ordinance standards and would not generate excess groundborne vibration. (*Less than Significant*)

Construction noise is regulated by the San Francisco Police Code, article 29, sections 2907 and 2908. Police Code section 2907 requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA (A-weighted decibels) at 100 feet from the source. Impact tools, such as pavement breakers and jackhammers, are not subject to the equipment noise limit provided that impact tools and equipment have intake and exhaust mufflers recommended by the manufacturers and approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation. Police Code section 2908 prohibits construction work between 8 p.m. and 7 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection. The proposed project is required to comply with Police Code section 2907. The proposed project would not include nighttime construction, so Police Code section 2908 would not apply.

Construction of the four 90-foot-tall light standards would occur between 7 a.m. and 8 p.m. Nighttime work is not required. The construction activities are regulated by article 29 of the Police Code (section 2907, Construction Equipment). No impact pile driving is required. The limited construction duration of three months, combined with construction methods and equipment typical for installation of field lighting and a wireless telecommunications services facility would not generate excessive noise or groundborne noise and vibration.³¹ Thus, the temporary construction-related noise impacts are less than significant.

The nearest sensitive receptors are residences approximately 75 feet to the west of J.B. Murphy Field and approximately 75 feet to the south.³² There are no sensitive receptors adjacent to the north and east project site boundaries. The nearest sensitive receptors to the east are located approximately 610 feet away from the eastern boundary of J.B. Murphy Field. The primary vibration-sensitive receptors in the project area would be existing structures, which could be susceptible to damage, and people, who could be susceptible to

³¹ The project sponsor did not receive noise complaints during the previous construction of the four 90-foot-tall light standards or from the installation of the wireless telecommunications services facility and fenced ground enclosure adjacent to the northwest light standard.

³² The aesthetics analysis reports distances from the proposed light standards to the nearest residences, whereas the noise analysis reports distances from the school property line to the nearest residences. Because the property line is closer to residences than the light standards, the noise analysis reflects shorter receptor distances.

vibration-related annoyance, particularly during nighttime hours. Vibration impacts to structures are usually considered significant if construction vibration could potentially result in structural or cosmetic damage or, in the case of a historic resource, materially alter the resource pursuant to CEQA Guidelines section 15064.5. As discussed in section E.3, Cultural Resources, the proposed project is not directly adjacent to any known historical resources, nor are any historic resources located within the project area.

In light of these factors, construction noise and vibration associated with the project would be less than significant. No mitigation is required.

Impact NO-2: Operation of the proposed project could result in a substantial permanent increase in ambient noise levels in the project vicinity in excess of applicable standards. (*Potentially Significant*)

The shift in field programming to include varsity football games on Friday evenings, rather than Saturday afternoons, at J.B. Murphy Field using the amplified sound/PA system with speakers mounted on the 90-foot-tall light standards could have the potential to result in significant impacts related to noise levels above ambient conditions. Therefore, this topic is further discussed in EIR section 3.C, Noise.

Impact C-NO-1: Construction of the proposed project, in combination with cumulative projects, could result in a significant cumulative impact on noise. (*Less than Significant*)

The geographic extent for the cumulative impact analysis for noise would be limited due to the rapid attenuation of noise and vibration with distance. The St. Ignatius Building Expansion Project, which is the only cumulative project, would include the demolition of five buildings, the excavation of 37,000 cubic yards of soil, and the construction of a new academic building addition on the school campus; however, the construction window for this project would not overlap with that of the proposed project. Therefore, the proposed project, in combination with the cumulative project, would result in less than significant cumulative construction-related noise and vibration impacts. No mitigation is required.

Impact C-NO-2: Operation of the proposed project, in combination with cumulative projects, could result in a significant cumulative impact on noise. (*Potentially Significant*)

Operational noise characteristics of the proposed project would be primarily associated with evening football games at J.B. Murphy Field with use of the amplified sound/PA system. Additionally, programmatic shifts in field use at J.B. Murphy Field and the upper practice field during the school year would shift the timing of mechanical and human noise-generating activities including the use of the amplified sound/PA system, coach whistles, and crowd noise. Practices would shift from early mornings to later in the mornings and to afternoons and evenings on weekdays. Games would shift to later start times on weekdays with most ending by 8 p.m. while up to 12 junior varsity and varsity football games would shift from Saturday mornings and afternoons to Friday evenings, with five junior varsity games ending at 6 p.m. and up to eight varsity games, including playoffs and a potential varsity football championship game, ending at 10 p.m. Cumulative operational noise impacts are not anticipated, as the St. Ignatius Building Expansion Project is the only cumulative project in the immediate vicinity that could combine with proposed project operations. Potential cumulative operational noise impacts are discussed further in EIR section 3.C, Noise.

7. Air Quality

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CLEAN AIR PLAN

The Bay Area Air Quality Management District (air district) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (air basin). The air district is responsible for attaining and maintaining air quality in the air basin within federal and state air quality standards, as established by the federal Clean Air Act and the California Clean Air Act. The air district has the responsibility to monitor ambient air pollutant levels throughout the air basin and to develop and implement strategies to attain the applicable federal and state standards. The federal and state clean air acts require plans to be developed for areas that do not meet air quality standards. The most recent air quality plan, the *2017 Clean Air Plan, Spare the Air, Cool the Climate* (2017 clean air plan), was adopted by the air district on April 19, 2017.³³ The 2017 clean air plan updates the most recent Bay Area ozone plan, the Bay Area 2010 Clean Air Plan, in accordance with the requirements of the state clean air act to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The 2017 clean air plan contains the following primary goals:

- Protect air quality and health at the regional and local scale: Attain all state and national air quality standards and eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants.
- Protect the climate: Reduce Bay Area greenhouse gas emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The 2017 clean air plan represents the most current applicable air quality plan for the air basin. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of any air quality plans (topic E.7(a)).

³³ Bay Area Air Quality Management District, *2017 Clean Air Plan, Spare the Air, Cool the Climate*, April 19, 2017. Available at: <https://www.baaqmd.gov/en/plans-and-climate/air-quality-plans/current-plans>. Accessed September 23, 2025.

CRITERIA AIR POLLUTANTS

In accordance with the state and federal clean air acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. The air basin is designated as either in attainment or unclassified for most criteria pollutants, with the exception of ozone, PM_{2.5}, and PM₁₀.³⁴ Ozone, PM_{2.5}, and PM₁₀ are designated as non-attainment for either the state or federal standards.³⁵ Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x).

By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.

The air district has established screening criteria to assist lead agencies in determining when further analysis is necessary to determine whether project emissions would be significant.³⁶ If a proposed project meets the screening criteria, then it is assumed that the project would result in less-than-significant impacts from emissions of criteria air pollutants. Otherwise, a project may require a detailed air quality impacts assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The air district's *CEQA Air Quality Guidelines* note that the screening criteria are generally based on new development on greenfield³⁷ sites without any form of mitigation measures taken into consideration. The screening criteria do not account for project design features, attributes, or local development requirements that also could result in lower emissions.

The significance thresholds for emissions of ROG and NO_x are based on the stationary source limits in air district regulation 2, rule 2, which requires that any new source that emits criteria air pollutants above the ROG and NO_x emissions limit must offset those emissions. Projects that would result in criteria air pollutant emissions below these significance thresholds would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin.³⁸ Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

FUGITIVE DUST

Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices at construction sites significantly controls fugitive dust emissions,

³⁴ PM₁₀ is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM_{2.5}, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.

³⁵ "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.

³⁶ Bay Area Air Quality Management District, *CEQA Thresholds and Guidelines Update*, chapter 4, April 20, 2022. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed September 23, 2025.

³⁷ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

³⁸ Bay Area Air Quality Management District, *CEQA Thresholds and Guidelines Update*, April 20, 2022. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed September 23, 2025.

and individual measures have been shown to reduce fugitive dust emissions by anywhere from 30 to 90 percent.³⁹ The air district has identified a number of best management practices to control fugitive dust emissions from construction activities.⁴⁰ The City's Construction Dust Control Ordinance (Ordinance No. 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust emissions, and the best management practices employed in compliance with the City's construction dust control ordinance are an effective strategy for controlling construction-related fugitive dust.

LOCAL HEALTH RISKS AND HAZARDS

In addition to criteria air pollutants, individual projects may emit *toxic air contaminants* (TACs). The term TACs collectively refers to a diverse group of air pollutants that can cause chronic (i.e., of long duration) and acute (i.e., severe but short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

To identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the air district to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the *air pollutant exposure zone*, were identified based on health-protective criteria that consider estimated cancer risk, exposures to fine particulate matter, proximity to freeways, and locations with particularly vulnerable populations. The project site is not located within the air pollutant exposure zone.

Impact AQ-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan. (*Less than Significant*)

In determining consistency with the 2017 clean air plan,⁴¹ this analysis considers whether the proposed project would: (1) support the primary goals of the plan; (2) include applicable control measures from the plan; and (3) avoid disrupting or hindering implementation of control measures identified in the plan.

The clean air plan recommends 85 specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. To the extent that the air district has regulatory authority over an emissions source generated by the project, the control measures may be requirements of the proposed project. Control measures most applicable to the proposed project are transportation measures and energy and climate measures.

³⁹ Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. Available online: https://www.env.nm.gov/wp-content/uploads/sites/2/2017/02/WRAP_FDHandbook_Rev_06.pdf. Accessed September 23, 2025.

⁴⁰ Bay Area Air Quality Management District, *CEQA Thresholds and Guidelines Update, Table 5-2*, April 20, 2022. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed September 23, 2025.

⁴¹ Bay Area Air Quality Management District, *Spare the Air Cool the Climate, Final 2017 Clean Air Plan*, April 2017. Available at: https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-_proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed September 23, 2025.

The proposed project's impact with respect to energy and climate measures are discussed in section E.8, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the City's Greenhouse Gas Reduction Strategy.

The proposed project is not anticipated to result in a substantial increase in automobile trips and vehicle miles traveled. The proposed shift in timing for the use of J.B. Murphy Field includes later starts for morning practices, more afternoon practices, and additional evening practices which would conclude by 9:30 p.m. The project would also expand evening use of the upper practice field lighting to match J.B. Murphy Field lighting operations.

In addition to shifting weekday afternoon and evening games to later start times that would conclude by 8 p.m., the proposed project would relocate up to seven Saturday daytime varsity football games—each accommodating up to 1,500 spectators—to Friday evenings. An additional Friday evening championship football game would also be hosted if St. Ignatius were to qualify for a total of eight. This change in scheduling would alter the timing of vehicle trips and is expected to increase weekday peak-period traffic, as Friday evening games would draw larger crowds. For up to three high-attendance games per year (including the additional varsity football championship game), spectator numbers are anticipated to rise by as many as 500, increasing attendance from 1,500 to 2,000. Since the installation of lighting at J.B. Murphy Field, the St. Ignatius athletic program has expanded to include flag football and rugby. These activities now include practices and games at J.B. Murphy Field and Fairmont Field. The upper practice field is used for practices only.

The additional athletic events for the four new flag football and rugby teams would generate fewer than 300 spectators per event. The one potential additional varsity football championship game would be a peak-attendance event with 2,000 spectators. Viable transportation options surrounding the project site, including bicycle, pedestrian, and transit facilities, provide alternatives to private automobile use for field users and spectators.

Transportation control measures outlined in the 2017 clean air plan are implemented through the general plan and planning code, including the City's Transit First Policy, transportation demand management program requirements, and transit impact development fees. The proposed project aligns with the 2017 clean air plan's goals because access to J.B. Murphy Field and the upper practice field is available by walking, bicycling, and use of public transit and is located within a transit priority area (see also discussion in section E.5, Transportation and Circulation). Furthermore, the proposed lighting would replace the use of diesel generator-powered, portable lights⁴², which would increase energy efficiency and reduce operational emissions.

The proposed project would not conflict with or obstruct the implementation of the 2017 clean air plan. The impact would be less than significant. No mitigation is required.

⁴² Prior to the installation of the four 90-foot-tall light standards, the school used six diesel generator-powered portable lights for approximately 50 evenings per year to extend practices until 8 p.m.

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

Short-term construction activities typically result in emissions of ozone precursors and particulate matter in the form of fugitive dust and exhaust, e.g., vehicle tailpipe emissions. Emissions of ozone precursors and particulate matter are primarily a result of the combustion of fuel from onroad and offroad vehicles. However, ROG's are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. The construction of the four 90-foot-tall light standards would require excavation to approximately 30 feet below ground surface in four discrete locations. The construction duration would be approximately three months.

Fugitive Dust

Project-related excavation may cause wind-blown dust that could contribute particulate matter to the local atmosphere. Depending on exposure, adverse health effects could occur due to this particulate matter in general, as well as due to specific contaminants, such as lead or asbestos, that may be constituents of soil. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure.

In response, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008). The intent of the ordinance is to reduce the quantity of dust generated during site preparation, demolition, and construction work in order to protect the health of the general public and of onsite workers; minimize public nuisance complaints; and avoid orders to stop work by the Department of Building Inspection.

The construction dust control ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures, whether or not the activity requires a permit from the Department of Building Inspection.⁴³

In compliance with the dust control ordinance, the project sponsor and contractor responsible for construction activities at the project site would be required to control construction dust on the site through a combination of watering disturbed areas, covering stockpiled materials, street and sidewalk sweeping, and other measures.

Compliance with the regulations and procedures set forth by the dust control ordinance would ensure that potential dust-related air quality impacts would be reduced to less than significant.

Criteria Air Pollutants

As previously discussed, site preparation work, demolition, and other construction activities would result in emissions of criteria air pollutants from the use of off- and onroad vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis to identify whether the project may exceed the criteria air pollutant significance thresholds, the air district developed screening criteria. If a proposed project meets the screening criteria, then construction of

⁴³ The director of the department of building inspection may waive this requirement for activities on sites less than one-half-acre that are unlikely to result in any visible wind-blown dust.

the project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed the significance thresholds. The air district's *CEQA Air Quality Guidelines* note that the screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

The proposed project includes the construction of four 90-foot-tall light standards at J.B. Murphy Field with a wireless telecommunications services facility installed at the northwest light standard and a ground-level structure for ancillary equipment at its base. The construction would involve excavations up to 30 feet below ground surface at four discrete locations for the installation of the 90-foot-tall light standards, requiring the removal of approximately 60 cubic yards of soil. These activities would follow construction best management practices for fugitive dust control required by both the City and the air district, e.g., covering excavated materials for offsite transport. The size of the construction activities would be below the criteria air pollutant screening size of 452,000 square feet for a high school land use, as identified in the air district's *CEQA Air Quality Guidelines*. Thus, quantification of construction-related criteria air pollutant emissions is not required, and the proposed project's construction activities would result in a less-than-significant criteria air pollutant impact. No mitigation is required.

Impact AQ-3: During project operations, the proposed project would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants. (*Less than Significant*)

The air district's criteria air pollutant operation-related screening size is 579,000 square feet for a high school land use. The proposed project, which involves the operation of lighting at the school's main athletic field as well as the expanded use of lighting at the school's upper practice field, would be below the operational screening criteria for a school. Thus, the quantification of the project-generated operational criteria air pollutant emissions is not required. Therefore, the proposed project would not exceed any operational criteria air pollutant significance thresholds and would result in a less-than-significant impact with respect to criteria air pollutants. No mitigation is required.

Impact AQ-4: The proposed project's construction and operational activities would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial pollutant concentrations. (*Less than Significant*)

As previously discussed, the project site is not within an air pollutant exposure zone, therefore existing background health risks at the project site and vicinity are not substantial. Construction of the four 90-foot-tall light standards and the wireless telecommunications services facility would require use of delivery/haul trucks, an auger, hand tools, a bucket truck, and a crane, some of which may be diesel-powered. Thus, the proposed project would generate toxic air contaminants during construction from the use of diesel-powered construction equipment. The construction and operational health risks from the proposed project's emissions are further analyzed below.

Construction Emissions

Sensitive land uses near the project site include residential uses along 39th Avenue and Rivera Street. Although onroad heavy-duty diesel vehicles and offroad equipment would be used during the three-month

construction duration for the light standards and the eight-week construction duration for the wireless telecommunications services facility, emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be required to comply with California regulations limiting vehicle idling to no more than five minutes,⁴⁴ which would further reduce nearby sensitive receptor exposure to temporary and variable diesel particulate matter emissions. Therefore, because the project site is not within the air pollutant exposure zone and construction activities would be temporary, limited, and variable over the up to five-month sequenced construction period, TAC emissions would result in a less-than-significant impact to sensitive receptors.

Operational Emissions

The proposed project would reduce the number of early morning practices by shifting practices to a later morning start time and to afternoons and evenings. It would also shift games and track-and-field meets to later start times in the afternoons and evening. Participation levels by student and coaches for established athletic programs (e.g., football, soccer, lacrosse) would remain the same and is not anticipated to generate any additional vehicle trips. The proposed field use program would accommodate two new sports programs (rugby and flag football) with four additional teams. The proposed project would generate a limited number of new vehicle trips due to the addition of 28 games, with attendance that ranges from 50 to 300 people per event, and 85 practices. The proposed project would shift the timing of up to 12 junior varsity and varsity football games at J.B. Murphy Field from Saturday mornings and afternoons to Friday afternoons and evenings and would host a championship football game among the three varsity playoff games if St. Ignatius were to qualify. The proposed project would not expand seating capacity at J.B. Murphy Field; however, the shift of varsity football games from Saturday afternoon to Friday evening is expected to result in up to 500 additional spectators per event and one additional playoff game over 2020 baseline conditions. Most of the increase would be from students who would already be on the St. Ignatius campus for after-school programs and the junior varsity games; however, some portion of the increase may generate new vehicle trips. The proposed project would generate a limited number of new vehicle trips due to the shift in timing of varsity football games. According to the air district, roads with less than 10,000 vehicles per day are considered “minor low-impact sources” that “do not pose a significant health impact even in combination with other nearby sources. These determinations were made through extensive modeling, sources tests, and evaluation of their TAC emissions.” Since the proposed project is not anticipated to substantially increase vehicle trips to and from the project site, the vehicle trip estimate would be well below this threshold and dispersed across the local roadway network.

The proposed project would eliminate the use of six diesel generator-powered portable lights at J.B. Murphy Field for approximately 50 evenings per year. The project would not include a diesel emergency generator. Therefore, an assessment of project-generated TACs is not required, as the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors.

⁴⁴ California Code of Regulations, title 13, Division 3, section 2485 (onroad) and section 2449(d)(2) (offroad). Available at: https://ww2.arb.ca.gov/sites/default/files/2022-06/13_CCR_2485_OAL_06222022-2_ADA_06272022_0.pdf and [https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I9AAB29705A1E11EC8227000D3A7C4BC3&originContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I9AAB29705A1E11EC8227000D3A7C4BC3&originContext=documenttoc&transitionType=Default&contextData=(sc.Default)). Accessed September 23, 2025.

Considering these factors, the proposed project would not emit toxic air contaminants at levels that would expose sensitive receptors to substantial air pollutant concentrations, and this impact would be less than significant. No mitigation is required.

Impact AQ-5: The proposed project would not create objectionable odors that would adversely affect a substantial number of people. (*Less than Significant*)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion. The proposed uses are not typical odor sources of concern and would not create a significant source of new odors. Additionally, the proposed operation of field lighting at J.B. Murphy Field would replace the six, diesel generator-powered portable lights used at J.B. Murphy Field for up to approximately 50 evenings per year. Therefore, the proposed project would not result in other emissions, such as odors, that could adversely affect a substantial number of people, and this impact would be less than significant. No mitigation is required.

Impact C-AQ-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on air quality. (*Less than Significant*)

Regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts. The project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to result in a considerable net increase in non-attainment criteria air pollutants. Therefore, the cumulative criteria air pollutant analysis is presented in Impacts AQ-2 and AQ-3. The remainder of this cumulative air quality analysis addresses cumulative health risks and odors to sensitive receptors.

The project site is not located within an air pollutant exposure zone; therefore, existing background health risks at the project site and vicinity are not considered substantial. The St. Ignatius Building Expansion Project would demolish five buildings on the school campus and construct a new addition to the main academic building. The St. Ignatius Building Expansion Project would result in some emissions of toxic air contaminants, including diesel emissions from construction activities; however, pursuant to Director's Bulletin No. 2 for Type 3, Clean Construction projects, St. Ignatius has committed to using Tier 4 engines on all diesel-fueled construction equipment. As a result, no significant construction or operational air quality impacts would occur.

The cumulative project would generate some odors during construction, but odors would be temporary. Upon completion of construction activities, the cumulative project combined with the proposed project would not generate substantial odors. Therefore, cumulative construction and operational air quality impacts associated with odors would be considered less than significant. No mitigation is required.

8. Greenhouse Gas Emissions

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts. For this reason, the analysis of the proposed project’s impact on climate change focuses on the project’s contribution to cumulatively significant GHG emissions and this section does not include an individual project-specific impact statement.

On April 20, 2022, the air district adopted updated GHG thresholds.⁴⁵ Consistent with CEQA Guidelines sections 15064.4 and 15183.5, which address the analysis and determination of significant impacts from a proposed project’s GHG emissions, the updated thresholds for land use projects such as the proposed project maintain the air district’s previous GHG threshold. The updated thresholds allow projects that are consistent with a GHG reduction strategy to conclude that the project’s GHG impact is less than significant.

San Francisco’s 2023 GHG Reduction Strategy Update⁴⁶ presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco’s GHG reduction strategy in compliance with the air district’s guidelines and CEQA Guidelines. These GHG reduction actions have resulted in a 41 percent reduction in GHG emissions in 2020 compared to 1990 levels,⁴⁷ which far exceeds the goal of 2020 GHG emissions equaling those in 1990 set in Executive Order S-3-05⁴⁸ and the California Global Warming Solutions Act.⁴⁹ The City has also met and exceeded the 2030 target of 40 percent reduction below

⁴⁵ Bay Area Air Quality Management District, *CEQA Thresholds and Guidelines Update*, April 20, 2022. Available at: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>. Accessed September 23, 2025.

⁴⁶ San Francisco Planning Department, *2023 Greenhouse Gas Reduction Strategy Update*, October 2023. Available at: <https://sfplanning.org/project/greenhouse-gas-reduction-strategies>. Accessed September 23, 2025.

⁴⁷ San Francisco Department of the Environment, *San Francisco’s 2019 Carbon Footprint*. Available at: <https://sfenvironment.org/carbonfootprint>. Accessed September 23, 2025.

⁴⁸ Office of the Governor, *Executive Order S-3-05*, June 1, 2005. Available at: <https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf>. Accessed September 23, 2025.

⁴⁹ California Legislative Information, *Assembly Bill 32*, September 27, 2006. Available at: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf. Accessed September 23, 2025.

1990 levels set in the California Global Warming Solutions Act of 2016⁵⁰ and the air district's 2017 clean air plan⁵¹ more than ten years before the target date.

San Francisco's GHG reduction goals, updated in July 2021 by ordinance 117-02,⁵² are consistent with, or more aggressive than, the long-term goals established under executive orders S-3-05,⁵³ B-30-15,⁵⁴ B-55-18,⁵⁵ the California Global Warming Solutions Act of 2016.⁵⁶ The updated GHG ordinance demonstrates the City's commitment to continued GHG reductions by establishing targets for 2030, 2040, and 2050 and setting other critical sustainability goals. In particular, the updated ordinance sets a goal to reach net zero sector-based GHG emissions by 2040 and sequester any residual emissions using nature-based solutions.⁵⁷ Thus, the City's GHG reduction goal is consistent with the state's long-term goal of reaching carbon neutrality by 2045. The updated GHG ordinance required the San Francisco Department of the Environment to prepare and submit to the mayor a climate action plan (CAP) by December 31, 2021. The CAP, which was released on December 8, 2021, and will be updated every five years, carries forward the efforts of the City's previous CAPs and charts a path toward meeting the GHG commitments of the Paris Agreement (e.g., limit global warming to 1.5 degrees Celsius) as well as the reduction targets adopted in the GHG ordinance.

In summary, the CEQA Guidelines and air district-adopted GHG thresholds allow projects consistent with an adopted GHG reduction strategy to determine a less-than-significant GHG impact. San Francisco has a GHG reduction strategy that is consistent with near and long-term state and regional GHG reduction goals and is effective because the City has demonstrated its ability to meet state and regional GHG goals in advance of target dates. Therefore, projects that are consistent with San Francisco's GHG reduction strategy would not result in GHG emissions that would have a significant effect on the environment, and would not conflict with state, regional, or local GHG reduction plans and regulations.

⁵⁰ California Legislative Information, Senate Bill 32, September 8, 2016. Available at: https://leginfo.ca.gov/faces/billTextClient.xhtml?bill_id=201520160SB32. Accessed September 23, 2025.

⁵¹ Bay Area Air Quality Management District. 2017. Clean Air Plan. September 2017. Available at: <http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>. Accessed September 23, 2025.

⁵² San Francisco Board of Supervisors. Ordinance No. 117-21, File No. 210563. July 20, 2021. Available at: <https://sfbos.org/sites/default/files/o0117-21.pdf>. Accessed September 23, 2025. San Francisco's GHG reduction goals are codified in section 902(a) of the Environment Code and include the following goals: (1) by 2030, a reduction in sector-based GHG emissions of at least 61 percent below 1990 levels; (2) by 2030, a reduction in consumption-based GHG emissions equivalent to a 40 percent reduction compared to 1990 levels; (3) by 2040, achievement of net zero sector-based GHG emissions by reducing such emissions by at least 90 percent compared to 1990 levels and sequestering any residual emissions; and (4) by 2050, a reduction in consumption-based GHG emissions equivalent to an 80 percent reduction compared to 1990 levels.

⁵³ Executive Order S-3-05 sets forth a goal of an 80 percent reduction in GHG emissions by 2050. San Francisco's goal of net zero sector-based emissions by 2040 requires a greater reduction of GHG emissions.

⁵⁴ Office of the Governor, Executive Order B-30-15, April 29, 2015. Available at: <https://www.ca.gov/archive/gov39/2015/04/29/news18938/>. Accessed September 23, 2025. Executive Order B-30-15 sets a state GHG emissions reduction goal of 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

⁵⁵ Office of the Governor, Executive Order B-55-18, September 18, 2018. Available at: <https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf>. Accessed January 2025. Executive Order B-55-18 establishes a statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net negative emissions thereafter. San Francisco's goal of net zero sector-based emissions by 2040 is a similar goal but requires achievement of the target five years earlier.

⁵⁶ Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006) by adding section 38566, which directs that statewide greenhouse gas emissions be reduced by 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

⁵⁷ Nature-based solutions are those that remove remaining emissions from the atmosphere by storing them in natural systems that support soil fertility or employing other carbon farming practices.

Impact C-GG-1: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (*Less than Significant*)

The proposed project would result in minor GHG emissions during construction of the four 90-foot-tall light standards with a wireless telecommunications services facility installed on the northwest light standard and a ground-level structure for ancillary equipment at its base, but would not have any direct operational effects from the use of the J.B. Murphy Field lights or from the expanded use of the existing lighting at the upper practice field. Indirect effects would include GHG emissions from electricity providers, including the generation of the energy required to operate field lights. However, the proposed lighting at J.B. Murphy Field would use LED fixtures, which increase energy efficiency and help offset indirect effects. Furthermore, operation of the J.B. Murphy Field lights would reduce emissions of toxic air contaminants by eliminating the need for six diesel generator-powered lights at J.B. Murphy Field under 2020 baseline conditions.

Participation and attendance for most of the established sports programs do not fluctuate substantially and would not create additional vehicle trips. However, additional vehicle trips for practices and games are expected with the introduction of two new sports programs (rugby and flag football). The proposed project's addition of two new sports programs and the shift in football games to Friday evenings, including the potential addition of one varsity football championship game that could generate a temporary, short-term attendance increase, would result in an incremental increase in field-use-related vehicle trips and additional GHG emissions.

The proposed project would be subject to regulations adopted to reduce GHG emissions as identified in the GHG reduction strategy and demonstrated in the GHG checklist completed for the proposed project.⁵⁸ For example, the proposed project would meet the requirements of the Commuter Benefit Ordinance, which provides incentives for employees to use public transit to and from the school, and the Mandatory Recycling and Composting Ordinance. As noted previously, the two new sports programs added to the St. Ignatius athletic program and the potential for hosting a varsity football championship game would generate vehicle trips that did not occur under 2020 baseline conditions. Events associated with the new sports programs are expected to generate 50 to 300 spectators per event and would not be considered high-attendance events. A varsity football championship game would be among the three expected peak-attendance events with 2,000 spectators. Although spectators would primarily travel by personal vehicle, the project would result in a relatively minimal increase in events and associated attendance compared to 2020 baseline conditions. The additional events would, therefore, not generate substantial GHG emissions.

In addition, the proposed project would comply with other applicable regulations that would reduce the project's GHG emissions related to energy use and waste disposal. These regulations, discussed previously, have proved effective as San Francisco has reduced its GHG emissions by 41 percent below 1990 levels, which far exceed statewide and regional 2020 GHG reduction targets. Furthermore, the City's GHG emission reductions in 2019 also met statewide and regional 2030 targets more than ten years in advance of the target year. Therefore, because the proposed project would be subject to regulations adopted to reduce GHG emissions, the proposed project would be consistent with San Francisco's GHG reduction strategy and would

⁵⁸ San Francisco Planning Department, *Greenhouse Gas Analysis: Compliance Checklist for St. Ignatius Field Lighting Project*, November 21, 2024.

not generate significant GHG emissions nor conflict with state, regional, and local GHG reduction plans and regulations.

Because the proposed project would be consistent with the City’s GHG reduction strategy as well as the air district’s performance criteria related to GHGs, it would also be consistent with the GHG reduction goals of executive orders S-3-05, B-30-15, B-55-18, California Global Warming Solutions Act of 2016, and the clean air plan. As a result, the proposed project would not conflict with these plans and the impact of GHG emissions would be less than significant. No mitigation is required.

9. Wind

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Create wind hazards in publicly accessible areas of substantial pedestrian use?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact WI-1: The proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use. (Less than Significant)

The San Francisco Planning Code establishes wind comfort and wind hazard criteria used to evaluate new development in certain areas of the city. The wind comfort and wind hazard criteria established in the planning code are not applicable to the proposed project.

A project’s wind impacts are directly related to its height, orientation, design, location, and surrounding development context. The proposed project includes the installation of four 90-foot-tall light standards with a wireless telecommunications services facility installed on the northwest light standard and a ground-level structure for ancillary equipment. Based on numerous wind analyses in San Francisco and environs, a building that does not exceed a height of 85 feet generally has little potential to cause substantial changes to ground-level wind conditions. Although the proposed light standards would exceed 85 feet in height, they lack sufficient mass to generate substantial ground-level wind acceleration. Therefore, this impact would be less than significant. No mitigation is required.

Impact C-WI-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to wind. (Less than Significant)

The cumulative context for wind impacts would be local and limited to the immediate project vicinity.

The St. Ignatius Building Expansion Project, which is the only cumulative project in the immediate project vicinity, includes the demolition of five buildings for the construction of a 40-foot-tall building addition that would match the height of the main academic building. The new academic building addition would not be tall enough to create a significant cumulative wind hazard. As discussed in Impact WI-1, the proposed 90-

foot-tall light standards lack sufficient bulk to create substantial ground-level wind acceleration. Therefore, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative wind impact. No mitigation is required.

10. Shadow

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact SH-1: The proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces. (Less than Significant)

Section 295 of the San Francisco Planning Code generally prohibits structures greater than 40 feet in height that would cast additional shadows on open space under the San Francisco Recreation and Parks Commission’s jurisdiction between one hour after sunrise until one hour before sunset throughout the year, unless the shadow would not result in a significant adverse effect on use of the open space.

The proposed project is adjacent to the San Francisco Recreation and Park Department-managed West Sunset Soccer Fields, which is a public open space, located north of the project site. The proposed project would include the construction of four 90-foot-tall light standards with a wireless telecommunications services facility installed on the northwest light standard and a ground-level structure for ancillary equipment. The four light standards would be greater than 40 feet tall and could cast shadow on the West Sunset Soccer Fields; however, the proposed light standards lack sufficient bulk to cast substantial shadow. In addition, the nearest light standard would be approximately 250 feet south of the West Sunset Soccer Fields. As the sun rises in the east, structures cast their shadows to the west. Shadows are the smallest around noon when the sun is at its highest point. As the sun descends west in the early afternoon, structures cast their shadow to the east. As such, the proposed lights would not be close enough to cast a significant shadow on the West Sunset Soccer Fields nor would they dramatically affect the use and enjoyment of this park. The proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces. The impact would be less than significant. No mitigation is required.

Impact C-SH-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to shadow. (Less than Significant)

Significant cumulative shadow impacts could occur if the proposed project, in combination with cumulative projects, would combine to result in the creation of shadows on publicly accessible areas. The only cumulative development project within 0.25 mile of the project site is the St. Ignatius Building Expansion

Project, which would be located directly east of the West Sunset Soccer Fields. The St. Ignatius Building Expansion Project involves demolishing five existing buildings on the site and constructing a new addition to the existing main academic building. The expansion project would be approximately 40 feet tall (50 feet tall with mechanical screening) and would match the height of the existing main academic building. The St. Ignatius Building Expansion Project is not subject to Section 295 of the Planning Code since the height of the addition, as measured by the planning code, is not greater than 40 feet. The proposed project, in combination with the cumulative project, would result in a less than significant cumulative shadow impact. No mitigation is required.

11. Utilities and Service Systems

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Require or result in the relocation or construction of new or expanded, water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded, water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. (Less than Significant)

Water Supply

Water service for the construction and operation of the proposed project would be provided by the San Francisco Public Utilities Commission (SFPUC). The proposed project does not include any new residential elements and would not increase the student enrollment of St. Ignatius and, therefore, would not necessitate an expanded water supply. Minimal amounts of water would be used during construction and would be sourced from existing entitlements. There may be an incremental increase in water use (primarily from human consumption and sanitary uses) due to the proposed expanded use of campus facilities; however, these uses, which are comprised primarily of athletic team practices, are not considered heavy water consumption uses, and the increase would be negligible. Operation of the J.B. Murphy Field lights and expanded use of the upper practice field lights would not require the use of water.

Wastewater and Stormwater

Wastewater and stormwater generated at the project site would continue to be treated at the SFPUC's Oceanside Water Pollution Control Plant, which would have adequate capacity to treat wastewater originating from the project site during construction and proposed operation. The project site is already covered with impervious surfaces, and the proposed project would not create any new impervious surfaces. There may be an incremental increase in wastewater due to an additional number of practices and games but, overall, this increase would be minor. Furthermore, the proposed project would be required to comply with the City's Stormwater Management Ordinance and the Stormwater and Management Requirements and Design Guidelines, which ensure the proposed project includes appropriate stormwater management systems that retain runoff onsite and limit discharges from the project entering the city's combined stormwater sewer system. Accordingly, the proposed project would not result in a significant increase in the total amount of stormwater runoff. Additionally, the proposed project would not result in a significant increase in the concentration of pollutants or hazardous materials in stormwater runoff that would result in the need for the construction of new or expanded stormwater drainage and treatment facilities.

Natural Gas and Telecommunications

The construction and proposed operation of the project would not require any natural gas service. Pacific Gas and Electric Company (PG&E) currently provides electric power to the project site and would provide power during construction of the light standards and wireless telecommunications services facility. Various private companies provide telecommunications services. Electrical power needed to supply the LED lights was previously installed; therefore, no further onsite electrical system expansion would be needed. Operation of the proposed project, including the wireless telecommunications services facility, would not require or result in relocation or construction of any other new or expanded electric or wireless telecommunications services facility infrastructure.

For these reasons, the utilities demand associated with the proposed project would not exceed the service capacity of the existing providers and would not require the construction of new facilities or expansion of existing facilities. Therefore, this impact would be less than significant. No mitigation is required.

Impact UT-2: The proposed project would have sufficient water supplies available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years. (*Less than Significant*)

Sufficient water supplies are available to serve the existing school and its athletic facilities. The existing synthetic surfaces of J.B. Murphy Field and the upper practice field do not require irrigation and implementation of the proposed project is not expected to increase the current water use. Operation of the proposed project would not exceed the projections of the SFPUC's Urban Water Management Plan or their capacity to provide water to San Francisco.⁵⁹ Therefore, the proposed improvements would not substantially increase the existing demand for water consumption, and the proposed project would not have a significant effect on water supply. No mitigation is required.

Impact UT-3: The proposed project would not result in a determination by the wastewater treatment provider which serves or may serve the proposed project that it has inadequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. (*No Impact*)

As discussed in Impact UT-1 above, the increase in water use from human consumption and sanitary uses associated with the proposed project would constitute only a slight increase in comparison to the overall activity generated by the surrounding San Francisco population. The SFPUC's San Francisco Sewer System Master Plan already accounts for the city's projected population and employment growth.⁶⁰ The proposed project's demand for wastewater treatment capacity would not exceed the Oceanside Water Pollution Control Plant's capacity to treat wastewater flows from the project site as it would not increase population in the area. No impact would occur. No mitigation is required.

Impact UT-4: The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. (*Less Than Significant*)

In September 2015, the City entered into a landfill disposal agreement with Recology, Inc., for disposal of all solid waste collected in San Francisco at the Recology Hay Road Landfill in Solano County. Under existing conditions, the landfill receives an average of approximately 1,850 tons per day and is permitted to accept up to 2,400 tons per day. At the current disposal rate, the landfill has operating capacity until 2041.

Construction of the four light standards at J.B. Murphy Field would generate demolition and construction waste, primarily consisting of approximately 60 cubic yards of excavated soil. The City's Construction and Demolition Debris Recovery Ordinance (Ordinance No. 27-06) prohibits taking construction and demolition material to a landfill or placing such material in the garbage. All mixed debris must be transported by a registered hauler to a registered facility to be processed for recycling. Source-separated material must be

⁵⁹ San Francisco Public Utilities Commission, 2020 Urban Water Management Plan, 2020. Available at: <https://www.sfpuc.gov/sites/default/files/documents/UWMP%20Public%20Review%20Draft%2004012021%20FINAL.pdf>. Accessed October 2025.

⁶⁰ San Francisco Public Utilities Commission, San Francisco Sewer System Master Plan, 2010. Available at: www.gestaltgraphics.com/docs/SFSSSummary.pdf. Accessed October 2025.

taken to a facility that recycles or reuses those materials. The waste would be properly disposed of in accordance with law.

Operation of the proposed project would create a minor increase in solid waste generation. The LED light fixtures on the light standards would need to be replaced and disposed of when they are no longer functional. Since the LED light fixtures contain toxic metals, they must be disposed of at a hazardous waste collection site.⁶¹ Because LED light fixtures are more efficient than metal halide and incandescent bulbs, replacement would occur less often.⁶²

The use of the lights would allow for additional weekday evening use of J.B. Murphy Field for games and practices and the upper practice field for practices. The amount of additional waste generated by spectators and athletes as a result of expanded field operations would be negligible when compared to the capacity of local waste infrastructure. As previously discussed, there is adequate City-contracted landfill capacity through 2041 at the current disposal rate. The City also expects that a suitable alternative site would be identified prior to reaching the capacity threshold. As a result, the City has adequate solid waste capacity to serve the proposed project.

The proposed project would be required to comply with all applicable local, state, and federal laws and regulations concerning solid waste and, therefore, would not exceed state or local standards for solid waste, exceed the capacity of local infrastructure, or otherwise affect solid waste reduction goals. The project's impact with respect to landfill capacity would be less than significant. No mitigation is required.

Impact UT-5: The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. (*Less Than Significant*)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment show that the city generated approximately 870,000 tons of waste material in 2000. By 2010, that figure decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted. San Francisco set a goal of 75 percent landfill diversion by 2010 and 100 percent by 2020.⁶³ After exceeding the 75 percent diversion goal two years earlier than the targeted date, the City updated the zero-waste goal in September 2018, adding two new targets of (1) reducing municipal solid waste generation by 15 percent by 2030 and (2) reducing disposal to landfill and incineration by 50 percent by 2030.⁶⁴

San Francisco's Construction and Demolition Ordinance (Ordinance No. 27-06) requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. Furthermore, San Francisco Ordinance No. 100-09 (the Mandatory Recycling and Composting Ordinance) requires everyone in San Francisco to separate their solid waste into recyclable, compostable, and trash. The

⁶¹ CalRecycle, Waste Banned from the Trash, 2024. Available at: <https://calrecycle.ca.gov/homehazwaste/info/>. Accessed October 2025.

⁶² United States Department of Energy, LED Lighting, 2024. Available at: <https://www.energy.gov/energysaver/led-lighting>. Accessed October 2025.

⁶³ City and County of San Francisco. Resolution No. 679-02. Resolution for 75% Waste Diversion Goal. October 11, 2002. Available at: <https://www.sfenvironment.org/zero-waste-legislation>. Accessed September 23, 2025.

⁶⁴ San Francisco Department of the Environment. Policies Related to Zero Waste. Available at: <https://www.sfenvironment.org/zero-waste-legislation>. Accessed September 23, 2025.

proposed project would be subject to, and would comply with, San Francisco Ordinance No. 27-06, San Francisco Ordinance No. 100-09, and all other applicable statutes and regulations related to solid waste. The proposed project would comply with all applicable local, state, and federal laws and regulations pertaining to solid waste, and the impact would be less than significant. No mitigation is required.

Impact C-UT-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on utilities and service systems. (Less Than Significant)

The geographic scope for potential cumulative utilities and service systems impacts consists of the project area, its immediate vicinity, and the service areas of utilities and service system providers. The only cumulative project within 0.25 mile of the project site is the St. Ignatius Building Expansion Project, which includes the demolition of five buildings and the construction of a new addition for the school. No enrollment increases are proposed. The proposed project is located on the south side of the St. Ignatius campus and connected to the same utility and service systems as the St. Ignatius Building Expansion Project. Operation of the proposed project, in combination with the cumulative project, would result in an incremental increase in waste generation and electricity usage. However, the SFPUC and PG&E have the requisite capacity to serve the project’s wastewater and electrical needs and the combined needs for the St. Ignatius campus. Therefore, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on utilities and service systems. The cumulative impact would be less than significant. No mitigation is required.

12. Public Services

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services such as fire protection, police protection, schools, parks, or other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact PS-1: The proposed project would increase the demand for public services but not to such an extent that construction of new or physically altered facilities would be required. (Less than Significant)

The proposed project would continue to be serviced by the San Francisco Police Department and the San Francisco Fire Department. The nearest police station, Taraval Police Station, located at 2345 24th Avenue, is

approximately one mile southeast of the project site. For fire protection and emergency services, the proposed project would remain under the coverage of the San Francisco Fire Department, with Fire Station No. 18, located at 1935 32nd Avenue, approximately 0.75 mile from project site.

The proposed project would not increase enrollment at St. Ignatius, nor would it add any new residences to the surrounding area. The proposed project would allow St. Ignatius to accommodate practices and games for the four new varsity and junior varsity flag football and rugby teams. The addition of up to 28 flag football and rugby games (including playoffs) to the athletic event schedule would increase the overall number of low-attendance events (i.e., 50 to 300 spectators) that would occur annually as well as total attendance counts across all sports.

The proposed field use and lighting program would allow for additional weekday evening use of J.B. Murphy Field for games and practices and the upper practice field for practices. The proposed project would shift the timing of field use for weekday practices from early mornings to later in the morning and to afternoons and early evenings. Additionally, up to 12 Saturday morning and afternoon football games would be moved to Friday afternoons and evenings, including up to seven varsity football games (including playoff games). A varsity football championship game would also be hosted on Friday evenings if St. Ignatius qualifies.

Attendance would increase incrementally with up to 500 additional spectators at Friday evening varsity football games including peak-attendance events (between 1,000 and 2,000 spectators). However, this is anticipated to occur on only three evenings annually, including one additional varsity football championship game. Anticipated attendance for each event is summarized in EIR chapter 2, Project Description, and shown in EIR Appendix C, Table C-1.

The additional 28 low-attendance athletic events and increased attendance at varsity football games (including the additional playoff game) would not generate increased demand for public services in San Francisco, as the events would be temporary and are within the existing service territory for fire protection, emergency medical, and police services.

The proposed construction would comply with the applicable regulations of the California Fire Code. Proposed operation of the project would also be subject to and would comply with the regulations of the California Fire Code. The California Fire Code establishes requirements pertaining to fire protection systems, including the provision of state-mandated fire alarms, fire extinguishers, appropriate building access and egress, and emergency response notification systems, as determined by the San Francisco Fire Department. The proposed project would not involve new, or changes to existing, building and fire protection systems; however, it could involve increased usage of the campus for practices and games associated with the expanded St. Ignatius athletic program, consisting of four new varsity and junior varsity teams (flag football and rugby). The proximity of the project site to fire protection services would remain the same and, thus, it is expected that, in the event of a fire incident, response times would not change. The potential for fires is not expected to increase given the nature of the project operation, which involves practices and spectators attending games on an outdoor field. The proposed project would not require construction or alteration of a fire station or affect response times, service ratios, or other performance objectives related to fire protection services.

The proposed project would not increase the use of existing park and recreational facilities, schools, or libraries because there are no project components (e.g., residential, commercial) that would generate new demand for such facilities. Therefore, the proposed project would not increase the demand for public

services to such an extent that construction of new or physically altered facilities would be required. The impact would be less than significant. No mitigation is required.

Impact C-PS-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts on police, fire, and school district services such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service. (Less than Significant)

The cumulative context for project-related public services impacts would include the areas served by police districts, fire stations, schools, parks, and libraries. The only cumulative project within 0.25 mile of the project site is the St. Ignatius Building Expansion Project, which entails the demolition of five buildings and construction of a new addition for the school within the boundaries of the St. Ignatius campus. The project would not result in an increase in enrollment or staffing for the school or an increase in demand for any public services.

Project implementation would not cause an increase in demand for fire protection or police protection due to additional low-attendance sporting events and increased attendance at varsity football games, including the one additional high-attendance varsity football playoff game, at the campus. St. Ignatius, in coordination with the fire department and police department, has accounted for such events in providing public services to the residents of San Francisco. Fire protection, emergency medical, and police protection resources are regularly redeployed based on need in order to maintain acceptable service ratios. Operation of the proposed project would not result in the need for new or altered public service facilities.

Therefore, the proposed project, in combination with the cumulative project, would result in a less-than-significant cumulative impact on public services. No mitigation is required.

13. Biological Resources

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site, which is covered with artificial turf and a rubber track that surrounds J.B. Murphy Field, is located within a built urban environment. The project site does not contain any riparian habitats, other sensitive natural communities, or federally protected wetlands.^{65, 66} In addition, there are no adopted habitat conservation plans, natural community conservation plans, or other approved local, state, or regional habitat conservation plans that apply to the project site. Therefore, topics E.13(b), E.13(c), and E.13(f) are not applicable to the proposed project.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. (*Less than Significant*)

The project site consists of J.B. Murphy Field and the upper practice field located on a private high school campus. The St. Ignatius campus is in a developed urban area and is almost entirely covered by impervious surfaces, with academic, religious, and administrative buildings, paved parking lots, and sports facilities, with little natural land cover. Existing vegetation on the project site includes landscape planters and ornamental trees, and hedges running along the project frontage on 37th Avenue, Rivera Street, and 39th Avenue. The project site has been heavily disturbed and does not contain natural or vegetated habitats capable of supporting special-status species known to occur on the San Francisco Peninsula. Although large Monterey cypress trees—which are capable of supporting nesting raptors such as red-tailed hawks and red-shouldered hawks and could also support roosting bats—are located along the eastern perimeter of the West Sunset Soccer Fields approximately 200 to 225 feet north of the northernmost light standards at

⁶⁵ U.S. Fish and Wildlife Service, National Wetlands Inventory, 2023. Available at: <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>. Accessed October 2024.

⁶⁶ California Department of Fish and Wildlife, Natural Communities List, 2025. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline>. Accessed September 23, 2025.

J.B. Murphy Field, these trees are not located on the project site and are outside of school boundaries. The proposed project would not involve removal or disturbance of these offsite trees, and no light spill from use of the field lights would reach these trees due to orientation and shielding. The project does not involve the removal of any trees. The existing athletic fields on the project site are artificial turf and do not provide foraging habitat.

The West Sunset Soccer Fields provide open foraging habitat for raptors. These fields consist of irrigated, regularly mowed and maintained, turf grass used as athletic fields, and are subject to regular human and domestic dog disturbance. The project would not directly impact the West Sunset Soccer Fields. In addition, indirect impacts on wildlife using these fields, such as disturbance from project-related noise or light spill, would not occur. The proposed lighting is designed to meet spill-control standards and photometric modeling shows that light levels at the northern boundary of J.B. Murphy Field drop to background levels before reaching the West Sunset Soccer Fields.⁶⁷ Similarly, increases in noise associated with evening practices and games would be limited to the project site and would not exceed ambient levels already present at the adjacent athletic fields, which are regularly used for organized sports and community recreation.⁶⁸

The proposed project involves installation of four light standards within J.B. Murphy Field and associated modifications in use of both J.B. Murphy Field and the upper practice field to include evening use with lights at both fields. The proposed project would not impact suitable habitat for any rare or endangered plant or wildlife species as no suitable habitat occurs in the proposed project area. Therefore, the impact would be less than significant. No mitigation is required.

Impact BI-2: The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. (*Less than Significant*)

Bird Stikes, Nighttime Lighting, and Migratory Birds

The project site is fully developed and is not considered an urban bird refuge.⁶⁹ The project site consists of J.B. Murphy Field and the adjacent upper practice field, and both are artificial turf fields surrounded by urban development. The project site does not provide natural foraging habitat for migratory birds; however, the site is located south of the West Sunset Soccer Fields and within the Pacific Flyway, a major north-south migration corridor. Birds may pass overhead during seasonal migrations through the San Francisco Bay between February 15 to May 30 for spring migration and between August 15 to November for fall migration. While exact flight paths are unknown and vary by species, migratory birds typically follow coastlines, rivers, and mountain ranges. The adjacent West Sunset Soccer Fields provide irrigated, regularly mowed natural turf that can support some raptor foraging, but these fields are subject to frequent human and domestic dog disturbance. The proposed project would not alter or affect the West Sunset Soccer Fields.

⁶⁷ HLB Lighting Design, *St. Ignatius Field Lighting Study*, October 27, 2025. See EIR Appendix D.

⁶⁸ Baseline Environmental Consulting and Panorama Environmental, Inc., *Noise Technical Memorandum -- St. Ignatius College Preparatory School Field Lighting Project* (Case No. 2018-102648ENV-02), December 10, 2025. See EIR Appendix E.

⁶⁹ An urban bird refuge is defined by San Francisco Planning Code section 139(c)(1) as open spaces two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water.

Baseline light sources in the vicinity include streetlights, headlights, residential and commercial building lighting, lighting at the West Sunset tennis courts, the four light standards at the upper practice field (used up to 150 evenings per year), and the six diesel generator-powered lights at J.B. Murphy Field (used for up to 50 evenings per year). The project site is located in Environmental Zone E3^{70, 71}, which is characterized by moderately high, uniform, and continuous ambient lighting associated with human activity (i.e., habitation, recreation, and/or work), and is typically desired for nighttime safety and convenience.

The proposed project would install four shielded athletic field lights at J.B. Murphy Field and lighting would continue to be used at the upper practice field. Limiting nighttime lighting and incorporating shielding on sports-field lighting reduces the attraction of migratory birds to illuminated areas.⁷² All proposed field lighting would consist of fully shielded, full cut-off fixtures operated on programmable timers, ensuring lights turn off at a set time each evening and cannot remain unintentionally illuminated overnight. These lights would be directed downward to minimize light spill and skyglow and would be limited to evening use during the school year. Lighting is expected to be continuous (i.e., lighting delivered evenly along the length of a field, path, or street). After curfew (typically 10 p.m.), both light levels and uniformity may be reduced or turned off in some areas as activity levels decline; however, illumination from the existing streetlights would remain. While artificial lighting could temporarily deter bird use of the immediate area, urban-adapted birds are accustomed to existing ambient lighting, and the proposed project would not introduce unusual or large-scale light sources. Additionally, peak nocturnal migration typically occurs between 11 p.m. and 6 a.m. and all field activities and lighting associated with the project would end by 10 p.m. (with limited egress lighting until 10:45 p.m. for up to 15 events annually), thereby avoiding illumination during peak migration hours.⁷³ As a result, the proposed project would not attract, disorient, or impede the movement of migrating birds.

The project would not increase the risk of bird collisions because it would not introduce glass facades or broad reflective surfaces, and the proposed light standards consist of narrow metal poles rather than large, solid structures that could pose a strike hazard to birds. Therefore, the proposed project would not substantially interfere with migratory birds.

Effects of Nighttime Lighting on Special-Status Bats

The Monterey cypress trees along the eastern perimeter of the West Sunset Soccer Fields, approximately 200-225 feet north of the project site, could provide potential roosting habitat for bats. However, the proposed project would not remove or disturb these trees. Baseline lighting conditions in the project vicinity include streetlights athletic field lighting on the St. Ignatius fields, and lighting from adjacent residential and commercial sources including lights (until 10 p.m.) at the West Sunset tennis courts to the north. As described above, the proposed lights would be shielded, focused on the field, and operated on a limited

⁷⁰ Dark Sky International, Lighting zones. Available at: <https://darksky.org/resources/guides-and-how-tos/lighting-zones/>. Accessed September 23, 2025.

⁷¹ International Commission on Illumination, *Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations, 2nd Edition*, Table 3, October 2017. Available at: [CIE 150 2017 Guide on the Limitation of the Effects of Obtrusive Light Table 3.pdf](https://www.cie.org/2017/01/01/cie-150-2017-guide-on-the-limitation-of-the-effects-of-obtrusive-light-table-3.pdf). Accessed September 23, 2025.

⁷² United States Fish and Wildlife Service, Threats to Birds: Collisions (Nighttime Lighting), December 2025. Available at: <https://www.fws.gov/story/threats-birds-collisions-nighttime-lighting>. Also see Golden Gate Bird Alliance, Lights out for Birds, December 2025. Available at: <https://goldengatebirdalliance.org/conservation/make-the-city-safe-for-wildlife/learn-about-lights-out-san-francisco/>. Accessed December 2025.

⁷³ The Cornell Lab, BirdCast, 2025. Available at: <https://birdcast.info/science-to-action/lights-out/>. Accessed December 2025.

evening schedule; however, the proposed project would incrementally contribute to baseline nighttime lighting conditions due to the new and expanded operations.

Although the project site does not provide roosting habitat or high-quality bat foraging habitat, artificial lighting can influence insect activity by attracting insects to illuminated areas and reducing their presence in darker surroundings, which may affect bat foraging behavior. However, the illuminated fields do not provide high-quality bat foraging habitat and would be occupied during lighted evening activities, further limiting their attractiveness to foraging bats. No potential roosting trees would be removed, and all incremental lighting would be shielded and directed toward the fields and would not be anticipated to substantially increase insect attraction. Therefore, the proposed project would not have a significant impact on bats.

Effects of Increases in Ambient Noise on Wildlife

Wildlife in the project vicinity is already exposed to elevated ambient noise levels from ongoing school activities, athletic events, use of portable lighting generators, and vehicular traffic along Sunset Boulevard and nearby streets. The proposed project would shift morning practices to later in the morning and to afternoons and evenings; shift games and track-and-field meets to later start times in the afternoons and evenings; move up to 12 football games from Saturdays to Fridays, including up to seven Friday evening varsity football games; and increase the number of low-attendance (fewer than 300 spectators) athletic events by 28 events annually for new flag football and rugby teams. One additional varsity football playoff game with attendance estimated to be 2,000 spectators would also be added, and overall attendance at football games is expected to increase by 500 spectators. In total, the project would result in 370 additional practices and 29 additional games annually.

Use of the amplified sound/PA system would increase from 118 to up to 147 spectator-attended events annually (a 20 percent increase over 2020 baseline conditions). Two or three games would occur on the same day and most games would end by 8 p.m. except on up to 15 evenings annually when use would end at 10 p.m. Event-related noise, including amplified announcements, pregame music, crowd noise, and whistles, would occur later in the day and more frequently in the evening; however, noise levels and characteristics would remain similar to 2020 baseline conditions and would be limited in duration and frequency by defined schedules and start-stop times.

Wildlife in the surrounding urban area is accustomed to these noise conditions, and no special-status species rely on the project site or adjacent West Sunset Soccer Fields, which are already heavily disturbed by recreational use. Therefore, increases in ambient noise associated with the project would not adversely affect wildlife populations, and impacts would be less than significant.

Impact BI-3: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (No Impact)

The construction and proposed operation of the project would not result in the removal of any trees and would add approximately 25 new street trees along 39th Avenue and Rivera Street. All trees planted would be in accordance with applicable local policies. Therefore, the proposed project would not conflict with the City's local tree ordinance, and this impact would be less than significant. No mitigation is required.

Impact C-BI-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on biological resources. (Less than Significant)

A review of the California Natural Diversity Database⁷⁴ indicates that the project site and surrounding area do not contain habitat that supports any candidate, sensitive, or special-status species; do not include riparian habitat or other sensitive natural communities as defined by the California Department of Fish and Wildlife and United States Fish and Wildlife Service; do not contain any wetlands as defined by section 404 of the Clean Water Act; and do not fall within any local, regional, or state habitat conservation plans.

The only cumulative project within a 0.25-mile radius of the project site is the St. Ignatius Building Expansion Project, which entails the demolition of five buildings and the construction of a new addition for the school. This expansion would occur within the existing boundaries of the St. Ignatius school campus. Neither project would remove trees or natural vegetation. Both project areas are already developed and do not provide suitable habitat for special-status species.

Accordingly, construction and operation of the proposed project, in combination with the building expansion project, would not result in cumulative impacts on biological resources or conflict with applicable policies, ordinances or conservation plans. No cumulative impact would occur on biological resources, and no mitigation is required.

14. Geology and Soils

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

⁷⁴ California Department of Fish and Wildlife (CDFW). 2025. *California Natural Diversity Database (CNDDDB), RareFind 5*. Query for the San Francisco North quadrangle and 5-mile radius around the project site. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline>. Accessed September 23, 2025.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project would connect to the existing sewer system; there would be no use of septic tanks or alternative wastewater disposal systems for the proposed project. Therefore, topic E.14(e) is not applicable.

Impact GE-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, seismically induced ground failure including liquefaction, or landslides. (*Less than Significant*)

Fault Rupture

The proposed project involves the construction and operation of four 90-foot-tall light standards at J.B. Murphy Field, including a wireless telecommunications services facility located on the northwest light standard and a ground-level structure for ancillary equipment at its base, and the expanded use of existing lighting at the upper practice field during the school year. According to the geotechnical report for the proposed project,⁷⁵ the project site is not within an Alquist-Priolo Earthquake Fault Zone, and no known active faults run underneath the project site or in the project vicinity. The major active faults in the area are the San Andreas, Hayward, and San Gregorio faults. The closest is the San Andreas Fault, which is approximately three miles southwest of the project site. Therefore, the proposed project would not result in substantial adverse effects involving rupture of a known earthquake fault, and no impact would occur. No mitigation is required.

Strong Seismic Ground Shaking

The San Francisco Bay Area is a seismically active region. According to the U.S. Geological Survey, the overall probability of a magnitude 6.7 or greater earthquake to occur in the San Francisco Bay Area during the next 30 years is 72 percent.⁷⁶ Therefore, periodic minor earthquakes and a strong to very strong earthquake

⁷⁵ Langan Engineering, *Geotechnical Investigation Light Poles for Football Field Saint Ignatius College Preparatory*, June 6, 2019.

⁷⁶ U.S. Geological Service, *Frequently Asked Questions*. 2025. Available at: <https://www.usgs.gov/faqs/what-probability-earthquake-will-occur-los-angeles-area-san-francisco-bay-area>. Accessed September 23, 2025.

would be likely to affect the proposed project during its lifetime. To ensure that the potential for adverse effects related to geology and soils are adequately addressed, San Francisco relies on the state and local regulatory process for building permit review and approval, in accordance with the California Building Code and the San Francisco Building Code. The latter includes state code plus local amendments that supplement the state code, including the building department's administrative bulletins.

The proposed project would be required to follow the building department's local implementing procedures, including administrative bulletins, which are part of the local building code, and information sheets, which clarify building department requirements and procedures. On November 21, 2018, the building department issued Administrative Bulletin AB-082, Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review. The guidelines describe the review process for structural, geotechnical, and seismic hazard engineering design, including the characteristics considered in determining whether review is required and, if so, which reviews are required. The building department's permit review process ensures that the project's plans comply with applicable building code provisions and conform to the measures recommended in the project-specific geotechnical report. Impacts related to strong seismic ground shaking would be less than significant. No mitigation is required.

Liquefaction, Lateral Spreading, and Landslides

Liquefaction and lateral spreading of soils can occur when ground shaking causes saturated soils to lose strength because of an increase in pore pressure. According to the geotechnical report, the project site is not in a mapped liquefaction hazard zone, is relatively level, and not within a mapped landslide hazard zone.⁷⁷ Additionally, the potential for lateral spreading at the project site would be low.⁷⁸ Therefore, impacts related to liquefaction, lateral spreading, and landslides would be less than significant. No mitigation is required.

Impact GE-2: The proposed project would not result in substantial erosion or loss of topsoil. (*Less than Significant*)

The project site is fully developed and entirely occupied by the existing J.B Murphy Field and upper practice field. The proposed project consists of the construction and operation of four 90-foot-tall light standards at J.B. Murphy Field with a wireless telecommunications services facility located on the northwest light standard and a ground-level structure for ancillary equipment at its base, and the expanded use of existing lighting at the upper practice field during the school year.

The project would require excavation of approximately 60 cubic yards of soil to a depth of approximately 30 feet. Construction activities would be required to comply with the Construction Site Runoff Ordinance (ordinance no. 260-13), which requires all construction sites, regardless of size, to implement best management practices to minimize surface runoff erosion and sedimentation. Compliance with these requirements would ensure that the proposed project would not result in erosion. No changes to the existing site drainage are proposed that could increase erosion potential in the area. Therefore, the proposed project would not result in substantial erosion or the loss of topsoil. This impact would be less than significant. No mitigation is required.

⁷⁷ Langan Engineering, *Geotechnical Investigation Light Poles for Football Field Saint Ignatius College Preparatory*, June 6, 2019.

⁷⁸ Ibid.

Impact GE-3: The proposed project would not result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse by being located on a geologic unit or soil that is unstable, or that could become unstable. (*Less than Significant*)

As discussed in Impact GE-1, the potential for landslide or liquefaction at the project site is considered low. The project involves the construction and operation of four existing 90-foot-tall light standards at J.B. Murphy Field, including a wireless telecommunications services facility located on the northwest light standard and a ground-level structure for ancillary equipment at its base, and the expanded use of existing lighting at the upper practice field during the school year. The project is required to comply with the provisions of the California Building Code and the San Francisco Building Code that address issues related to seismic safety and unstable soil. The geotechnical report prepared for the proposed project⁷⁹ includes recommendations related to appropriate construction measures. These recommendations include the construction of the lights on deep foundations, with a minimum penetration depth of 20 feet below ground surface so that they will be supported by dense sand. Additionally, the report recommends that all support piers should be cased for the entire depth of drilling because the presence of groundwater is likely. Concrete should also be placed immediately upon completion of drilling, and drilled holes should be allowed to remain open overnight. Implementation of these recommendations ensure that the proposed project would not cause the soil underlying the project site to become unstable and result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse. The impact would be less than significant. No mitigation is required.

Impact GE-4: The proposed project would not create substantial risks to life or property by being located on expansive soils. (*Less than Significant*)

Expansive soils are characterized by their ability to undergo significant volume change (i.e., to shrink and swell) because of variations in moisture content. The geotechnical report for the proposed project concluded that the soil present at the project site was graded dense to very dense and, therefore, has a low potential for expansion.⁸⁰ The construction and operation of the project would not create substantial risks to life or property by being located on expansive soils. Impacts would be less than significant. No mitigation is required.

Impact GE-5: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (*Less than Significant*)

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates from a previous geological period. Paleontological resources are deposited and preserved within particular lithologic or “rock” units. Lithologic units that may contain fossils include sedimentary and volcanic formations. Collecting localities and the geologic formations containing those localities also are considered paleontological resources because they represent a limited, nonrenewable resource that, once destroyed, cannot be replaced. Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have

⁷⁹ Ibid.

⁸⁰ Ibid.

been recovered have high potential to contain additional significant paleontological resources.⁸¹ The potential to affect fossils varies with the depth and type of disturbance, geologic units on the project site, construction activities, and previous disturbance.

The project involves the construction of four 90-foot-tall light standards at J.B. Murphy Field which include excavation to a maximum depth of 30 feet below ground surface in four discrete locations. The geotechnical report indicates that the project site is underlain by up to approximately 19 feet of loose sand that is, in turn, underlain by dense sand. Due to the limited amount of excavation (approximately 60 cubic yards in total), the project would have a low likelihood of encountering unique paleontological resources. Additionally, based onsite conditions and prior disturbance, the potential to encounter paleontological materials during construction is considered low. No future construction activities are proposed. The proposed project would result in a less than significant impact on paleontological resources. No mitigation is required.

Impact C-GE-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on geology, soils, or paleontological resources. (*Less than Significant*)

The geographic scope for potential geology and soils impacts generally are local and site specific, encompassing the project site and immediate vicinity. The only cumulative project within 0.25 mile of the project site is the St. Ignatius Building Expansion Project, which entails the demolition of five buildings and the construction of a new addition for the school. This expansion would occur within the existing boundaries of the school campus. To have a cumulative impact, adverse geologic conditions would have to occur at the same time and in the same location as the proposed project.

The St. Ignatius Building Expansion Project would be subject to the same seismic safety standards and design review procedures as those applicable to the proposed project. Compliance with the seismic safety standards and the design review procedures would ensure that the cumulative effects of concurrent development project would be unlikely to occur. Therefore, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact related to geology, soils, or paleontological resources. The cumulative impact would be less than significant. No mitigation is required.

15. Hydrology and Water Quality

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

⁸¹ Society of Vertebrate Paleontology, Standard Procedures for the Assessment and Mitigation of Adverse Impacts of Paleontological Resources, 2010.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:					
i) Result in substantial erosion or siltation on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not located within a 100-year flood hazard area,⁸² or an area identified as being subject to potential inundation in the event of a tsunami along the San Francisco coast.⁸³ Therefore, the proposed project would not create a risk related to a release of pollutants due to inundation in a flood hazard, tsunami, or seiche zone and topic E.15(d) is not applicable to the proposed project and is not discussed below.

Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. (*Less than Significant*)

The project consists of the construction and proposed operation of four existing 90-foot-tall light standards at J.B. Murphy Field with a wireless telecommunications services facility located on the northwest light standard and a ground-level structure for ancillary equipment at its base, and the expanded use of existing lighting at the upper practice field during the school year. Construction of the light standards would require a

⁸² San Francisco Public Utilities Commission, Flood Maps 100-Year Storm Flood Risk Map (July 2019). Available at: <https://www.sfpuc.gov/learning/emergency-preparedness/flood-maps>. Accessed September 23, 2025.

⁸³ City and County of San Francisco, Community Safety Element of the San Francisco General Plan, 2012, Map 5 (Tsunami Hazard Zones San Francisco). Available at: https://sfmohcd.org/sites/default/files/53%20-%20San%20Francisco%20General%20Plan%2C%20Community%20Safety%20Element%2C%202012_Part1.pdf. Accessed September 23, 2025.

maximum excavation depth of 30 feet in four discrete locations, which could adversely affect water quality. Contaminants from construction vehicles and equipment, as well as sediment from soil erosion, could increase the pollutant load in runoff being transported to receiving waters during construction.

The depth of groundwater below the project site is estimated at approximately 25 to 30 feet below ground surface.⁸⁴ Based on the geotechnical report, given the proposed excavation depths, it is likely that project construction could encounter groundwater during excavation.

Any groundwater encountered during construction of the proposed project would be subject to the requirements of article 4.1 of the public works code, Industrial Waste, which requires groundwater to meet specified water quality standards before it is discharged to the combined sewer system. These measures ensure the protection of water quality during construction, which represents a temporary condition. The Bureau of Systems Planning, Environment, and Compliance of the SFPUC must be notified regarding projects that necessitate dewatering. In this case, the SFPUC may require water quality analysis prior to discharge. The project sponsor would be required to obtain a Batch Wastewater Discharge Permit from the SFPUC Wastewater Enterprise Collection System Division prior to any dewatering activities.

Wastewater and stormwater flows into the City's combined stormwater and sewer system and would be treated according to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Oceanside Water Pollution Control Plant before discharge into Pacific Ocean. The NPDES standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control Board. Construction activities would be minimal for the installation of the four light standards and would involve removal of approximately 60 cubic yards of soil. While some runoff may occur, it would not be substantial enough to violate wastewater standards due to the small scale of the construction activity. Given the location of the light standards on the campus in currently disturbed areas, and the flat topography, substantial runoff into storm drains is not expected to occur.

As discussed in Impact UT-1 above, implementation of the project would allow use of field lights at J.B. Murphy Field and enable expanded use of the upper practice field lights on weekdays and weekends for practices and events. The increase in human consumption and sanitary usage of water associated with the proposed project due to increased practices and events from the two additional sports programs (rugby and flag football) and increased attendance at varsity football games, including the possibility of one additional varsity football championship game, would not be considerable in comparison to the overall usage generated by the school and surrounding urban development. The usage would not increase the need for additional wastewater treatment and would not result in violation of any water quality standards. The SFPUC's infrastructure capacity plans already account for the city's projected population and employment growth. Impacts would be less than significant. No mitigation is required.

Impact HY-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin. (*Less than Significant*)

All groundwater resources are managed by the SFPUC's groundwater management program, ensuring that local groundwater resources designated for current or future beneficial uses are properly protected to

⁸⁴ Langan Engineering, *Geotechnical Investigation Light Poles for Football Field Saint Ignatius College Preparatory*, June 6, 2019.

prevent overdraft, pollution, or contamination. The proposed project would continue to source water from SFPUC.

The project site is developed and substantially covered with impervious surfaces. The proposed project would not increase the amount of impervious surfaces on the site. Therefore, the proposed project would not result in any change in infiltration or increase runoff from the project site.

As discussed in Impact HY-1, groundwater at the project site is located approximately 25-30 feet below the surface. Construction of the four light standards may require limited and localized dewatering. Project operation would not extract underlying water supplies. Consequently, the project would not substantially deplete groundwater resources, interfere with groundwater recharge, or impede sustainable groundwater management. Groundwater impacts would be less than significant. No mitigation measures are required.

Impact HY-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion, siltation, or flooding on or offsite; that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or that would impede or redirect flood flows. (*Less than Significant*)

Much of the project site is currently covered with impervious surfaces and structures. The proposed project would not increase the amount of impervious surface at the project site.

The project site does not contain any streams or water courses. The project would have no impact with respect to altering the course of a stream or river or substantially altering the existing drainage pattern of the project site or area. During construction, the proposed project would require the excavation of approximately 60 cubic yards of soil to depths of approximately 30 feet in four discrete locations. Resulting erosion and transportation of soil particles would not exceed the capacity of existing stormwater drainage systems.

The proposed project would be required to comply with the City's Stormwater Management Ordinance and therefore would not substantially increase the rate or amount of surface runoff such that substantial flooding, erosion, or siltation would occur on- or offsite. Therefore, the proposed project would not result in the contribution of runoff water that would cause substantial erosion or flooding or exceed the capacity of the City's combined stormwater/sewer system. This impact would be less than significant. No mitigation measures are required.

Impact HY-4: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. (*Less than Significant*)

The project's construction and proposed operation would not result in changes to water quality or groundwater management. No additional increases to impervious surfaces would be created, and there would be no increases to runoff or polluted runoff.

Groundwater encountered during project construction or operation would be required to meet certain water quality standards prior to discharge into the combined stormwater/sewer system. As discussed in Impact HY-2, the proposed project would neither permanently nor substantially deplete groundwater resources and would remain consistent with SFPUC's groundwater management program. For these reasons, the proposed project would not conflict with or impede implementation of a water quality control plan or a sustainable groundwater management plan. The impact would be less than significant. No mitigation is required.

Impact C-HY-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on hydrology and water quality. (Less than Significant)

The geographic scope for potential cumulative impacts on hydrology and water quality includes the project area and water bodies that could be affected by activities from other projects in the project area.

The only cumulative project within 0.25 mile is the St. Ignatius Building Expansion Project, which involves the demolition of five buildings and the construction of a new addition for the school within the existing boundaries of the St. Ignatius school campus. The cumulative development project would not result in an enrollment or staffing increase. Without an increase in the onsite population or impervious surfaces, an increase in water consumption, stormwater discharge, and wastewater generation is not anticipated and with a new building replacing older buildings water and wastewater systems would operate more efficiently.

Additionally, future development projects would be subject to the same water conservation, stormwater management, and wastewater discharge ordinances that would be applicable to the cumulative project. The SFPUC has accounted for such growth in its service projections. Therefore, given the nature of the proposed project, it would not combine with past, present, and reasonably foreseeable future projects to create significant cumulative impacts related to hydrology and water quality. The cumulative impact would be less than significant. No mitigation is required.

16. Hazards and Hazardous Materials

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not included on the list of hazardous materials sites compiled by the California Department of Toxic Substance Control pursuant to Government Code section 65962.5. The project site is also not located within an airport land use plan area, or within or adjacent to a wildland fire area. Therefore, topics E.16(d), E.16(e) and E.16(g) are not applicable.

Impact HZ-1: The proposed project would not create a significant hazard through the routine transport, use, or disposal of hazardous materials. (Less than Significant)

Construction of the four 90-foot-tall light standards, including installation of a wireless telecommunications services facility on the northwest light standard, would involve routine use of hazardous materials such as fuels, lubricants, paints, solvents, and other construction materials containing hazardous ingredients. During construction, minor equipment maintenance and refueling (from mobile or stationary fuel sources) would occur onsite. However, spills or hazards are not anticipated due to compliance with applicable regulations and standard construction best management practices. Lighting use at both fields would not require future construction; only routine maintenance would occur, which could involve hazardous materials handling, disposal, and transport (e.g., fixture replacement, painting).

Operation of the proposed project would require routine replacement and disposal of LED lights when they become nonfunctional. Because LED light fixtures contain toxic metals, they must be disposed of at a hazardous waste collection site.⁸⁵ All hazardous materials handling, disposal, and transportation would comply with applicable federal, state, and local regulations, including title 29, Section 1910 of the Code of

⁸⁵ CalRecycle, Waste Banned from the Trash, 2025. Available at: <https://calrecycle.ca.gov/homehazwaste/info/>. Accessed September 23, 2025.

Federal Regulations. Given the limited amount and type of hazardous materials associated with construction and ongoing use, the impact would be less than significant. No mitigation is required.

Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (*Less than Significant*)

Article 22A of the health code, also known as the Maher Ordinance, includes properties throughout the city where there is potential to encounter hazardous materials. These properties are located primarily in industrial zoning districts, sites with current or former industrial uses or underground storage tanks, sites with historic bay fill, and sites close to freeways or underground storage tanks. The Maher Ordinance, which is implemented by the San Francisco Department of Public Health, requires appropriate handling, treatment, disposal, and remediation of contaminated soils that are encountered in the building construction process. All projects in the city that disturb 50 cubic yards or more of soil and that are located on sites with potentially hazardous soil or groundwater are subject to this ordinance. Some projects that disturb less than 50 cubic yards may also be subject to the Maher Ordinance if they propose a change of use from industrial (e.g., gas stations, dry cleaners, etc.) to sensitive uses (e.g., residential, medical, etc.).

The proposed project would excavate up to 60 cubic yards of soil to a depth of up to 30 feet below ground surface. A portion of the project site is located in an area of San Francisco governed by article 22A of the health code, known as the Maher Ordinance, meaning that is known or suspected to contain contaminated soil and/or groundwater. The overarching goal of the Maher Ordinance is to protect public health and safety by requiring appropriate handling, treatment, disposal and, when necessary, remediation of contaminated soils that are encountered in the building construction process.

The project sponsor enrolled in the Maher Program and on October 30, 2020, the San Francisco Department of Public Health, Environmental Health Branch, Site Assessment and Mitigation (EHB-SAM) approved the project as compliant with San Francisco Health Code article 22A and issued a “No Further Action Required” letter to the project sponsor.⁸⁶ Compliance with the Maher Ordinance ensures that the project would not result in a significant impact with regard to hazardous materials. Therefore, construction and operation of the proposed project would not result in the release of hazardous materials into the environment through reasonably foreseeable upset and accident conditions. Impacts would be less than significant. No mitigation is required.

Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. (*Less than Significant*)

The proposed project is located at a school and is within one-quarter mile of A.P. Giannini Middle School, Robert Lewis Stevenson Elementary School, Sunset Elementary School, and Independence High School.⁸⁷

⁸⁶ San Francisco Department of Public Health, San Francisco Health Code, article 22A Compliance/No Further Action Required for 2001 37th Avenue (APN 2094/006), EHB-SAM No. SMED: 1973 (Maher Letter), October 30, 2020.

⁸⁷ San Francisco Planning Department, 2025, San Francisco Property Information Map, Map Viewer. Available at: <https://sfplanninggis.org/pim/>. Accessed September 23, 2025.

Construction would involve some hazardous material handling, as is typical for construction equipment. The materials would be handled in compliance with applicable federal, state, and local laws and regulations, as described above, and no impacts are anticipated. No future construction is proposed.

Operation of the proposed project would require routine replacement and disposal of LED lights when they become nonfunctional. Since the LED light fixtures contain toxic metals, they must be disposed of at a hazardous waste collection site.⁸⁸ As indicated in Impact HZ-1, all hazardous materials handling, disposal, and transportation would occur in accordance with applicable federal, state, and local regulations. Handling of hazardous materials would be conducted in accordance with title 29, section 1910 of the Code of Federal Regulations. The proposed project would have a less than significant impact on existing or proposed schools. No mitigation is required.

Impact HZ-4: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (*Less than Significant*)

The City's Emergency Management Program is part of a jurisdiction-wide system that provides emergency management guidance related to the prevention, preparedness, response, and recovery. The City's Emergency Response Plan uses an all-hazards approach to emergency planning and, therefore, encompasses all hazards that are applicable to the city and county, both natural and man-made, ranging from planned events to large-scale disasters. Construction occurring onsite at four discrete locations along the perimeter of J.B. Murphy Field would not require any lane or street closures.

The proposed project would shift vehicle trip timing from early mornings to later morning, afternoons and evenings, and from Saturday mornings and afternoons to Friday afternoons and evenings. The proposed project would not introduce any new design features that could impede emergency vehicle access at the project site or in the surrounding area, and existing emergency evaluation plans would remain in place for all practices and events.

Project operation is not anticipated to substantially change the overall volume of vehicles trips during games and practices. Attendance at most games is anticipated to remain similar; field lighting would allow more practices and games to be scheduled, providing greater programming flexibility. The shift of up to seven varsity football games (including potential playoff games) from Saturday afternoons to Friday evenings is expected to increase attendance by approximately 500 spectators, and the project would potentially add one additional high-attendance varsity football championship game if the St. Ignatius varsity football team qualifies.

Overall, new vehicle trips associated with the proposed project—including 85 practices and 28 games for the new flag football and rugby teams, the shift of varsity football games to Friday evenings, and the potential for one additional varsity football championship game—would not result in substantial traffic changes. With existing emergency evacuation plans and implementation of the St. Ignatius Large Event Management Plan during high-attendance events, impacts related to emergency response or evacuation would be less than significant. No mitigation is required.

⁸⁸ CalRecycle, Waste Banned from the Trash, 2025. Available at: <https://calrecycle.ca.gov/homehazwaste/info/>. Accessed September 23, 2025.

Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to hazards and hazardous materials. (*Less than Significant*)

Impacts from hazards and hazardous materials are generally site specific and typically do not combine with impacts from other projects to create significant cumulative impacts. The only cumulative project within a 0.25-mile radius is the St. Ignatius Building Expansion Project, which entails the demolition of five buildings, excavation of 37,000 cubic yards of soil, and the construction of a new addition for the school within the existing boundaries of the St. Ignatius campus. Similar to the proposed project, this cumulative project was subject to the Maher Ordinance and would comply with the same federal, state, regional, and local regulations designed to protect the public health and the environment from risks of hazards and hazardous materials and to maintain emergency access routes.

Because of compliance with the laws and regulations, cumulative impacts are not anticipated. Any future development in the project site vicinity would be subject to these same laws and regulations. Therefore, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to hazards and hazardous materials. The cumulative impact would be less than significant. No mitigation is required.

17. Energy

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact EN-1: The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. (*Less than Significant*)

The proposed project involves the construction and operation of four 90-foot-tall light standards at J.B. Murphy Field, including a wireless telecommunications services facility located on the northwest light standard and a ground-level structure for ancillary equipment at its base. The project also includes the expanded use of the existing upper practice field lights. The proposed J.B. Murphy Field lighting would use LED lighting technology and would replace the six, 30-foot-tall, diesel generator-powered lights that were used under 2020 baseline conditions on up to 50 evenings annually to extend practices to 8 p.m. Construction activities associated with installation of the lights and wireless telecommunications services facility would require minimal amounts of fuel- and electric-powered equipment and vehicles.

Under 2020 baseline conditions, St. Ignatius used portable diesel generator-powered lights to extend evening practices. LED lighting is substantially more energy efficient than diesel-powered and incandescent lighting, using less than 75 percent of the energy of standard incandescent bulbs.⁸⁹ Based on manufacturer specifications, the diesel generator-powered portable lights consumed approximately 462,000 kilowatt-hours (kWh) of electricity equivalent per year, whereas the new LED field lights would have a connected load of about 51 kilowatts (kW). Although the proposed project would allow for more frequent evening lighting use, the total annual energy consumption with the LED system would be lower than with the portable diesel generator-powered lights.

As previously discussed, the proposed project represents an overall upgrade in efficiency and could lead to reductions in energy consumption at the project site, including a shift from diesel generator-powered lighting equipment. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. The impact would be less than significant. No mitigation is required.

Impact EN-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (*Less than Significant*)

State plans for renewable energy and energy efficiency include California's Renewables Portfolio Standard Program (as revised by Senate Bill No. 100139) and the California Energy Efficiency Strategic Plan. The renewables standard program requires utilities to increase their renewable energy generation to 60 percent by 2030 and for all the state's electricity to come from carbon-free resources by 2045. The plan, which was developed in 2008, outlines goals to improve the energy efficiency of new construction within all major sectors throughout the state. Local plans include the City of San Francisco's energy efficiency requirements.

The proposed project's use of LED lighting at J.B. Murphy Field instead of the diesel generator-powered portable lights would increase energy efficiency as part of a larger shift to renewable energy sources available through the local electrical grid. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact would be less than significant. No mitigation is required.

Impact C-EN-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. (*Less than Significant*)

The geographic scope for potential cumulative impacts on energy resources is the broader region and state. Although overall energy demand in California is rising with population growth, the state is actively pursuing energy conservation efforts. In San Francisco, despite significant energy and fuel demands, both city and state policies aim to minimize increased demand through conservation and energy efficiency regulations and policies, ensuring energy is used efficiently and not wastefully.

⁸⁹ United States Department of Energy, LED Lighting, 2025. Available at: <https://www.energy.gov/energysaver/led-lighting>. Accessed September 23, 2025.

The St. Ignatius Building Expansion Project would be required to comply with all applicable building codes as well as local and state energy efficiency regulations, ordinances, and plans, including California’s Renewables Portfolio Standard Program, the California Energy Efficiency Strategic Plan, and City of San Francisco’s energy efficiency standards.

Therefore, the proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a significant cumulative impact related to energy. The cumulative impact would be less than significant. No mitigation is required.

18. Mandatory Findings of Significance

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
Does the project:					
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

NOTE: Authority cited: Public Resources Code sections 21083 and 21083.05, 21083.09. Reference: Section 65088.4, Gov. Code; Public Resources Code sections 21073, 21074, 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21080.3.1, 21080.3.2, 21082.3, 21084.2, 21084.3, 21093, 21094, 21095, and 21151; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

This initial study concludes that the proposed project may result in significant impacts related to aesthetics (light and glare) and operational noise, and could contribute to significant cumulative impacts in these same areas. Both light and glare and operational noise have the potential to adversely affect human beings. The impact areas are evaluated in detail in the EIR.

As described in section E, Evaluation of Environmental Effects, of this initial study, the following environmental resource topics are either not applicable to the proposed project or would result in no impact: population and housing, recreation, mineral resources, and wildfire. The proposed project would

result in less-than-significant impacts on the following topics: land use and planning, aesthetics (except for light and glare), cultural resources, tribal cultural resources, transportation, noise (except for operational), air quality, greenhouse gas emissions, wind, shadow, utilities and service systems, public services, recreation, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, and energy.


Because these topics are either not applicable or would result in no impact or less-than-significant impacts individually, the proposed project would not result in significant cumulative impacts on these resources. Further, because the proposed project would have less-than-significant impacts on biological resources and tribal cultural resources, the proposed project does not have the potential to substantially degrade the quality of the environment; reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of a rare or endangered plant or animal; or eliminate important examples of the major periods of California history or prehistory.

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F. Determination

On the basis of this Initial Study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.



Lisa Gibson
Environmental Review Officer
for
Sarah Dennis Phillips

DATE May 27, 2026

Director of Planning

G. Initial Study Preparers

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