San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

PUBLIC NOTICE

AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF PUBLIC HEARING

PROJECT INFORMATION

Date:	August 28, 2024
Project Title:	3400 Laguna Street Project
Project Address:	3400 Laguna Street
Case No.:	2022-009819ENV
Block/Lot No.:	1471/1003
Zoning District(s):	RM-1 (Residential – Mixed, Low Density) Use District 40-X Height and Bulk District
Neighborhood:	Marina
Project Sponsor:	Mary Linde, CEO/Heritage on the Marina 415.202.0343; MLinde@heritagesf.org
EIR Coordinator:	Megan Calpin – 628.652.7508 CPC.3400LagunaEIR@sfgov.org

PUBLIC HEARING INFORMATION

Hearing Date:	September 26, 2024
Time:	12 p.m. or later
Location:	City Hall, 1 Dr. Carlton B. Goodlett Place, Room 400
Case Type:	Environmental (draft EIR)
Hearing Body:	Planning Commission

The San Francisco Planning Department (San Francisco Planning) has studied this project's potential physical environmental effects and welcomes your comments on the adequacy of the draft EIR. Refer to the Project Description and Purpose of Notice sections below for more information.

Project Description

A draft EIR has been prepared by San Francisco Planning in connection with this project as required by the California Environmental Quality Act (CEQA) to study the project's potential physical environmental effects.

The approximately 68,090-square-foot (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna and Bay streets intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The project site has been occupied by the Heritage on the Marina residential care retirement community since 1925. Heritage on the Marina

consists of five existing structures of approximately 83,200 gross square feet: the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage. The proposed project would continue to operate as a residential care facility. The proposed project would demolish two of the five existing buildings (the Perry Connector and the Health Center) and construct two new buildings over a below-grade garage (the Bay Building and the Francisco Building) of heights not to exceed 40 feet (excluding rooftop appurtenances) and in the same locations as the demolished structures. The proposed project would renovate the Julia Morgan Building and the Perry Building. In total, the proposed project would add approximately 58,380 square feet of institutional use, and increase the number of residential care suites by 23 from 86 to 109.

Draft EIR: The draft EIR finds that implementation of the proposed project would not lead to any significant and unavoidable project-level or cumulative impacts. The draft EIR provides a detailed project description, an analysis of physical environmental effects of the project, and identifies feasible mitigation measures and alternatives that would avoid or lessen the severity of project impacts. The draft EIR is available for public review and comment on the San Francisco Planning Department's website at sfplanning.org/sfceqadocs and at the San Francisco Permit Center, 49 South Van Ness Avenue, 2nd Floor, San Francisco, CA 94103. Paper copies and electronic copies (on a USB drive) of the draft EIR are available upon request to the EIR coordinator. Referenced materials are available through the following Planning Department's web pages: sfplanning.org/sfceqadocs and sfplanning.org/resource/permits-my-neighborhood.

Purpose of Notice

You are not required to take any action. If you wish to comment on the adequacy of the draft EIR, you may do so in either or both of the following ways:

WRITTEN COMMENTS

EIR Coordinator: Megan Calpin
Via Mail: 49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103
Via Email: CPC.3400LagunaEIR@sfgov.org

From August 28, 2024, to 5 p.m. on October 15, 2024

COMMENT AT THE PUBLIC HEARING

Location: City Hall, 1 Dr. Carlton B. Goodlett Place, Room 400

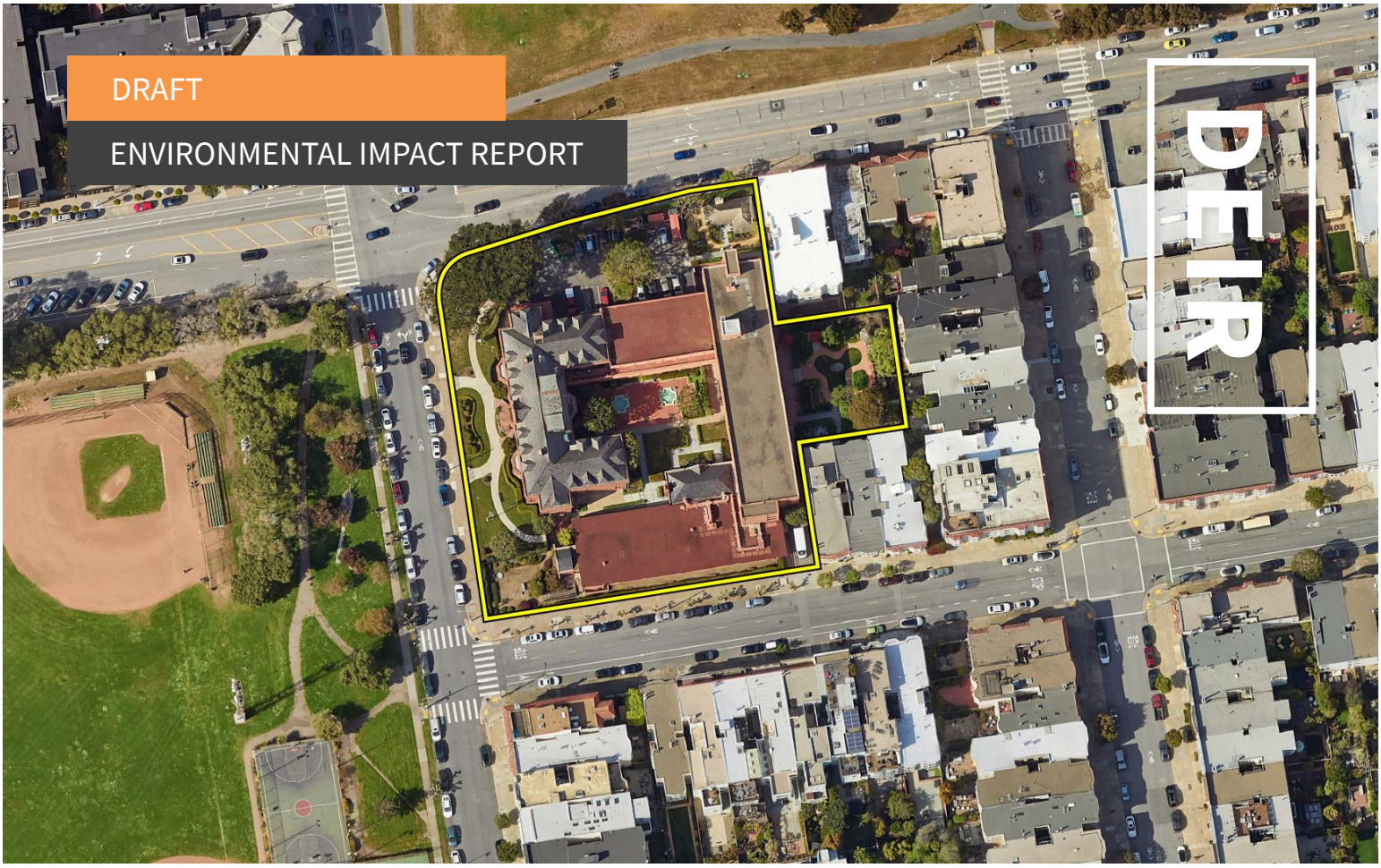
September 26, 2024, at 12 p.m. or later

The purpose of the public hearing is for the San Francisco Planning Commission and San Francisco Planning staff to receive comments on the adequacy and accuracy of the draft EIR. The commission will not respond to any of the comments or take action on the project at this hearing. Certification of the Final EIR will be considered at a later hearing. Environmental review focuses on the physical environmental effects of the project. Comments regarding your like or dislike of the project or if you think officials should approve or disapprove the project will not be addressed in the environmental review document. Instead, we encourage you to provide these comments to the planner assigned to review the project for planning code and general plan compliance. The current planner for this project is Jeffrey Horn, Jeffrey.horn@sfgov.org or 628.652.7366. Additional information may be found on San Francisco Planning's website or by contacting the EIR coordinator listed above.

General Information about Procedures

Members of the public are not required to provide personal identifying information when they communicate with San Francisco Planning Commission or staff. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the department's website or in other public documents. Only commenters on the draft EIR will be permitted to file an appeal of the certification of the Final EIR to the Board of Supervisors.
At the close of the public review period, San Francisco Planning Department will prepare a Responses to Comments document to respond to all comments on the draft EIR presented at the public hearing and received in writing during the public review period. This Responses to Comments document and all other associated documents will be made available at sfplanning.org/sfceqadocs.

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3400 Laguna Street Project

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

State Clearinghouse No. 2024050241

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

Written comments should be sent to:

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

San Francisco Planning

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3400 Laguna Street Project

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LIST OF ABBREVIATIONS AND ACRONYMS

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

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

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SUMMARY

S.1 Introduction

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

S.1.1 Project Summary

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

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

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

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

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

Table S-1 Project Summary

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

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

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

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

S.2 Summary of Impacts and Mitigation Measures

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

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

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

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

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

S.3 EIR Topics

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

S.4 Summary of Project Alternatives

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

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

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

S.4.1 No Project Alternative

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

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

S.4.2 Rehabilitation Alternative

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

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

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

Summary of Impacts

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

S.4.3 Reduced Construction Alternative

Alternative Description

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

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

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

Summary of Impacts

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

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

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

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

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

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

Table S-4 Comparison of Proposed Project and Alternatives

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

S.5 Comparison of the Proposed Project and Alternatives

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

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

Table S-5 Comparison of Proposed Project and Project Alternatives

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

Table S-5 Comparison of Proposed Project and Project Alternatives

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

Table S-5 Comparison of Proposed Project and Project Alternatives

	Proposed Project	No Project Alternative	Rehabilitation Alternative	Reduced Construction Alternative
Initial Study Section E.15, Biological Resources				
Impact BI-1: The proposed project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LTSM	NI <	LTS <	LTSM <

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

S.6 Environmentally Superior Alternative

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

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

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

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

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

CHAPTER 1 INTRODUCTION

1.A Project Summary

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

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

1.B Purpose of this EIR

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

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

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

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

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

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

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

1.C Type of EIR

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

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

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

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

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

1.D CEQA Environmental Review Process

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1.D.4 Final EIR and EIR Certification

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

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

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

1.D.5 Mitigation Monitoring and Reporting Program

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

1.E Contents and Organization of this EIR

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

This draft EIR has been organized as follows:

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

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

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

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

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

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

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

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

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

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CHAPTER 2 PROJECT DESCRIPTION

2.A Project Overview

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

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

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

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

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

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

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

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

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

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

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

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



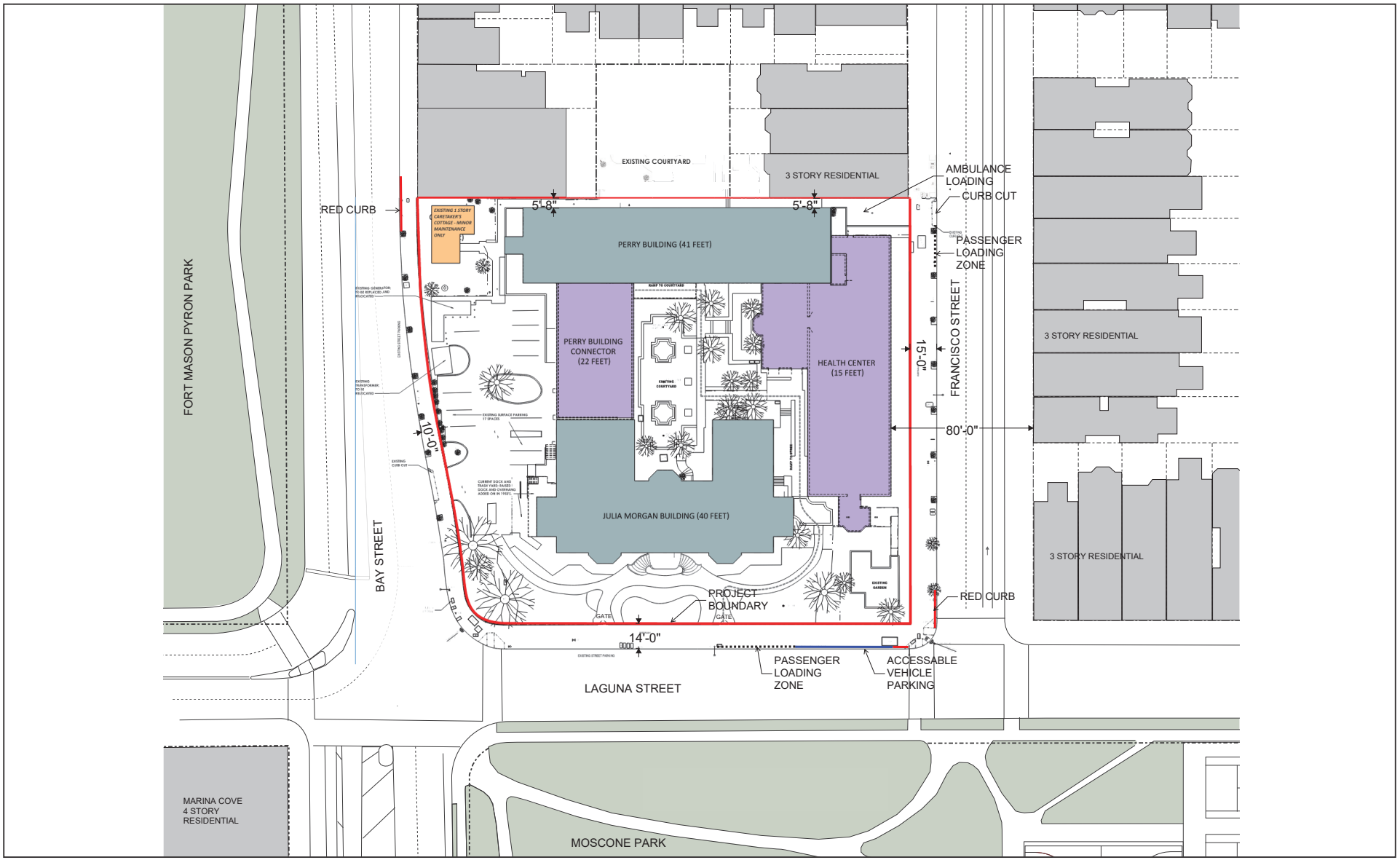
FIGURE 2-1

0 500
FEET

SOURCE: Esri Street Map 2024

3400 Laguna Street Project

Project Location



LEGEND

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

0 50 100

FEET

SOURCE: HKS, Inc.

FIGURE 2-2

3400 Laguna Street Project

Existing Site Plan

2.B Project Objectives

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

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

2.C Project Location and Existing Site Characteristics

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

2.C.1 Existing Land Use and Zoning

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

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

2.C.2 Existing Site Access

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

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

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

2.C.3 Existing Parking and Loading Operations

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

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

2.C.4 Existing Historic Status

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

2.D Proposed Project Characteristics

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

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

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

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

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

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

Table 2-1 Proposed Project Details

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

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

2.D.1 Proposed Building Program

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

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

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

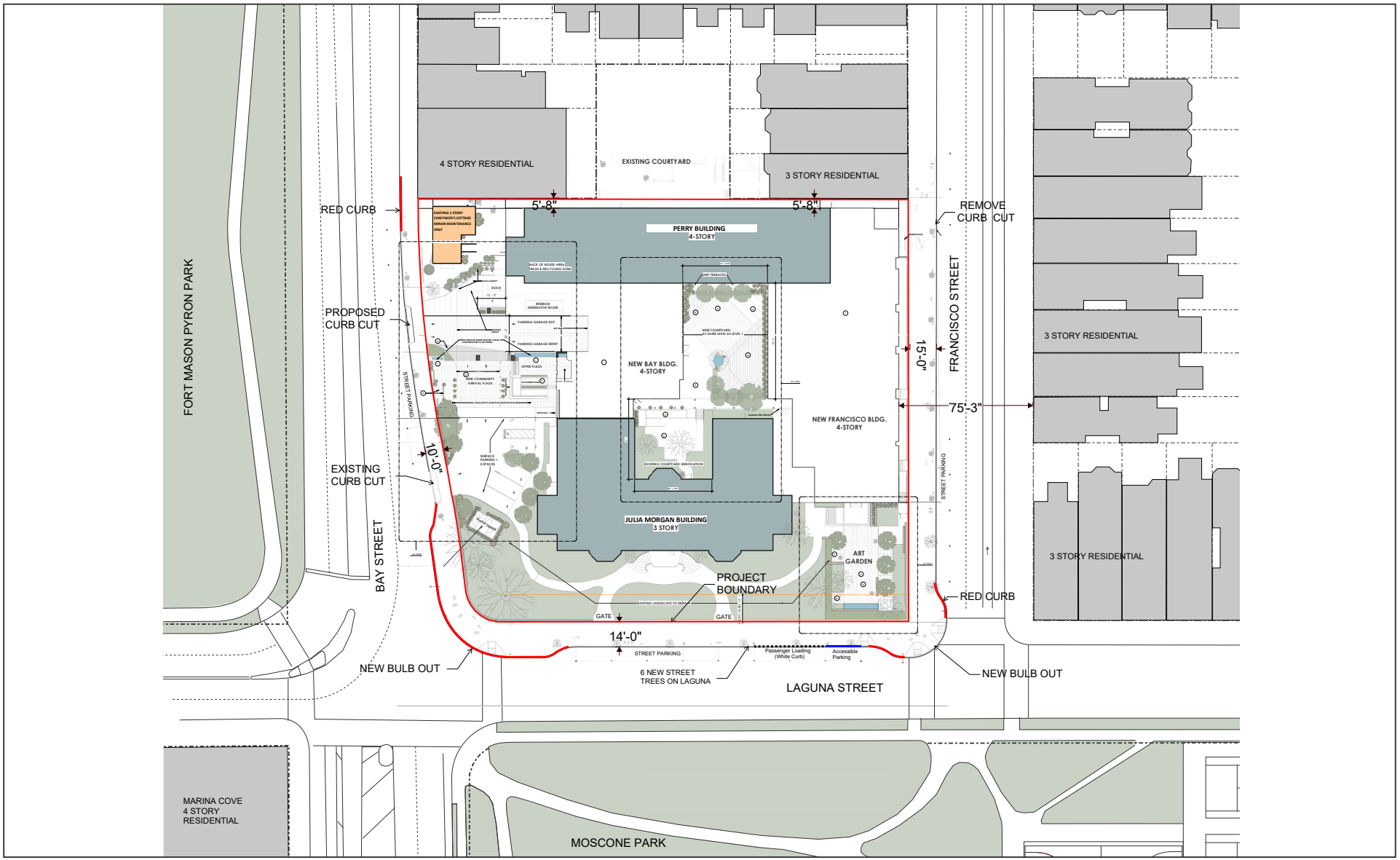
The proposed new Bay and Francisco buildings would have flat roofs; the Bay Building would also include a 3,080-square-foot occupied roof deck positioned away from neighboring residences. The roof deck would be serviced by two elevators (service elevator and passenger elevator) with a small shade trellis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

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

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

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

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



LEGEND

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

N

0 25 50

FEET

SOURCE: HKS, Inc.

FIGURE 2-3

3400 Laguna Street Project

Proposed Site Plan

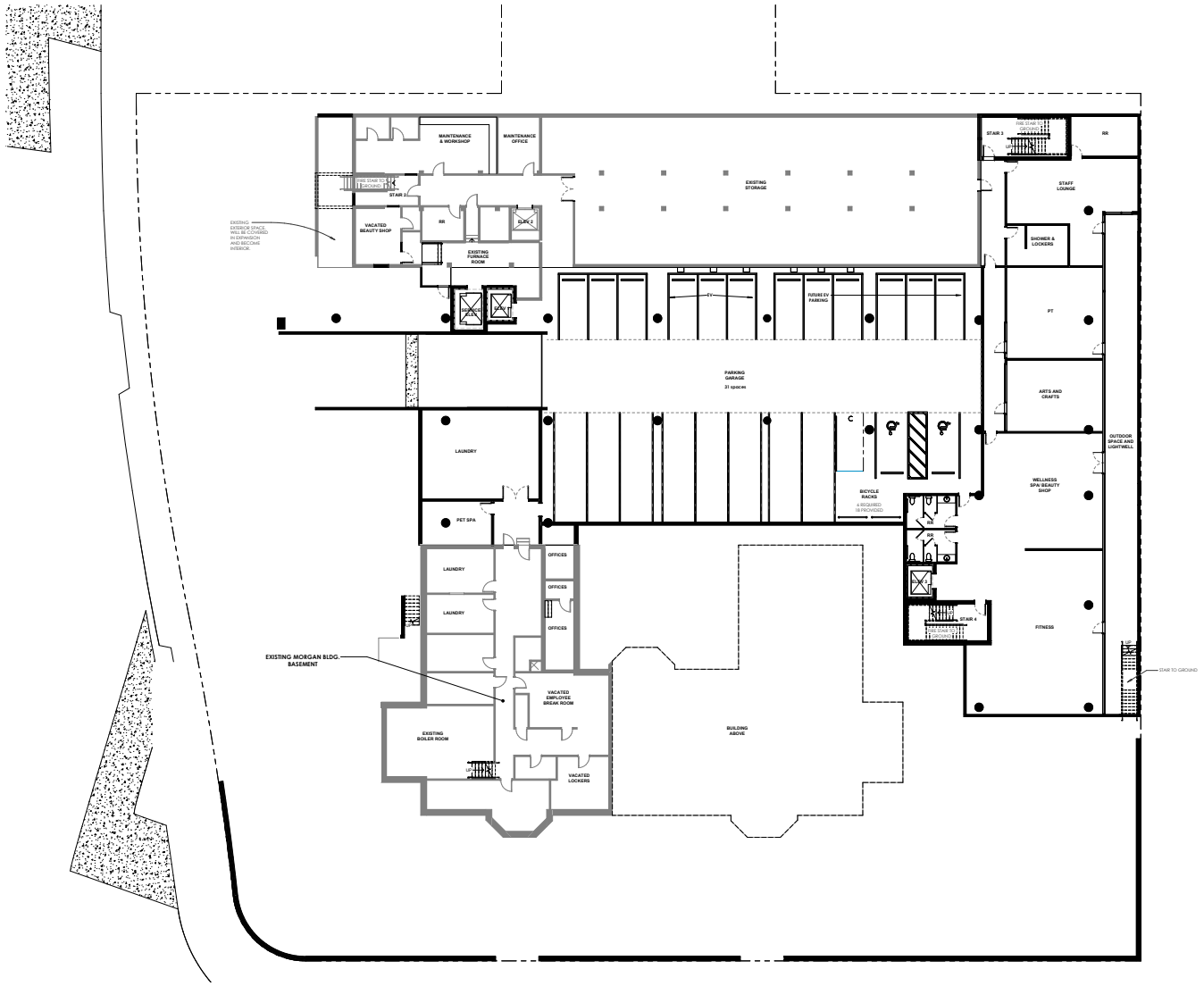


FIGURE 2-4

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Basement

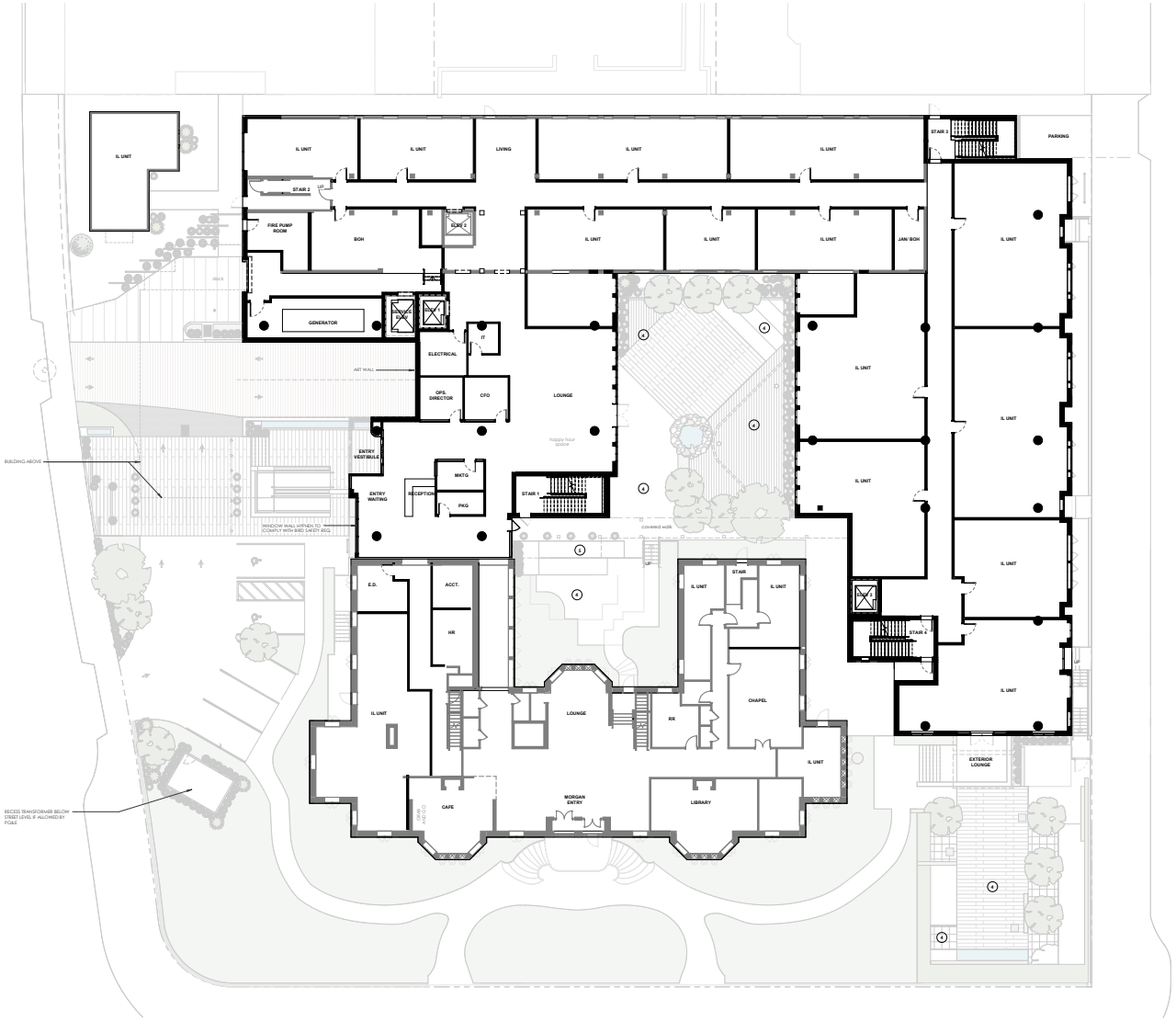


FIGURE 2-5

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 1

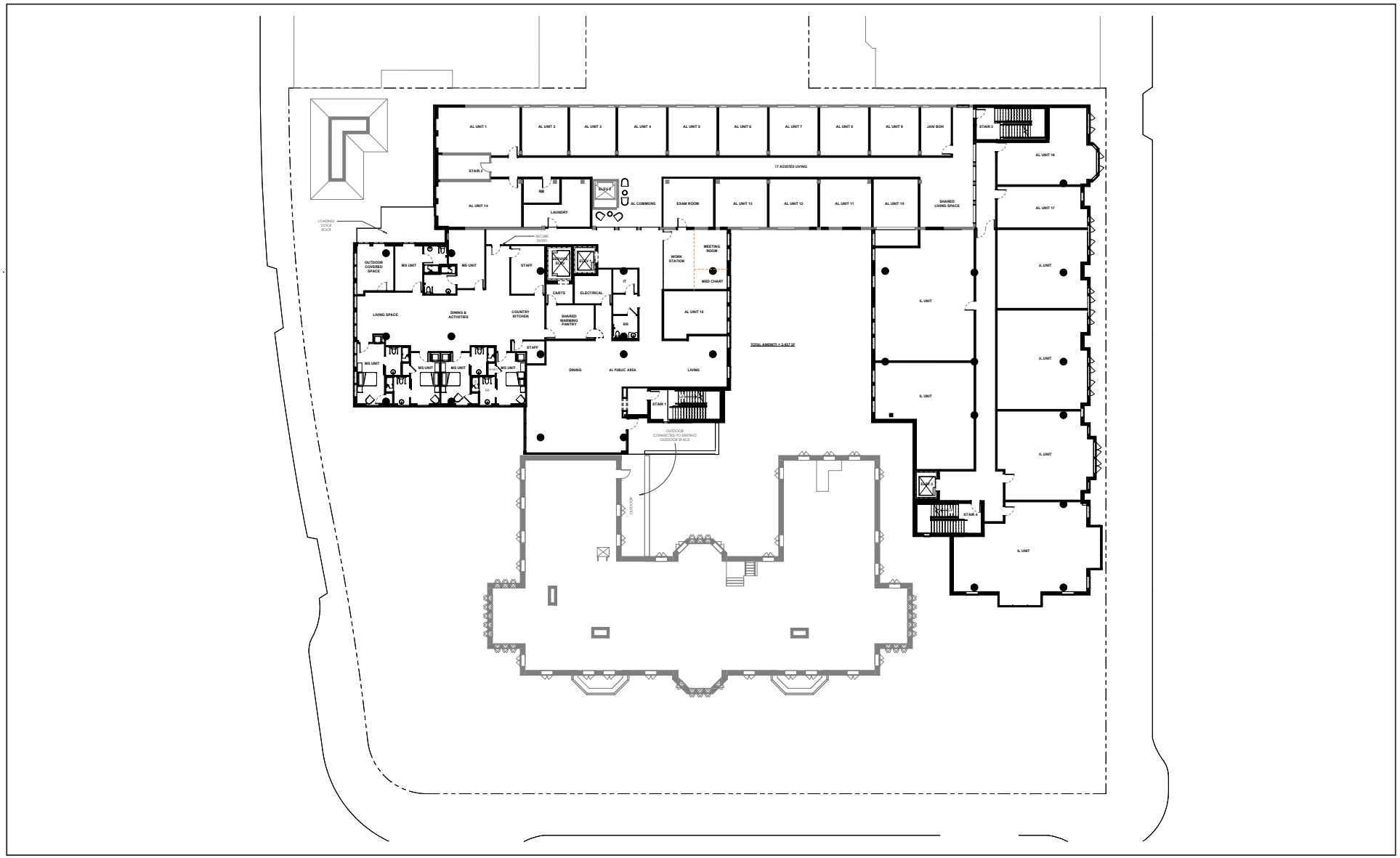


FIGURE 2-6

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 2

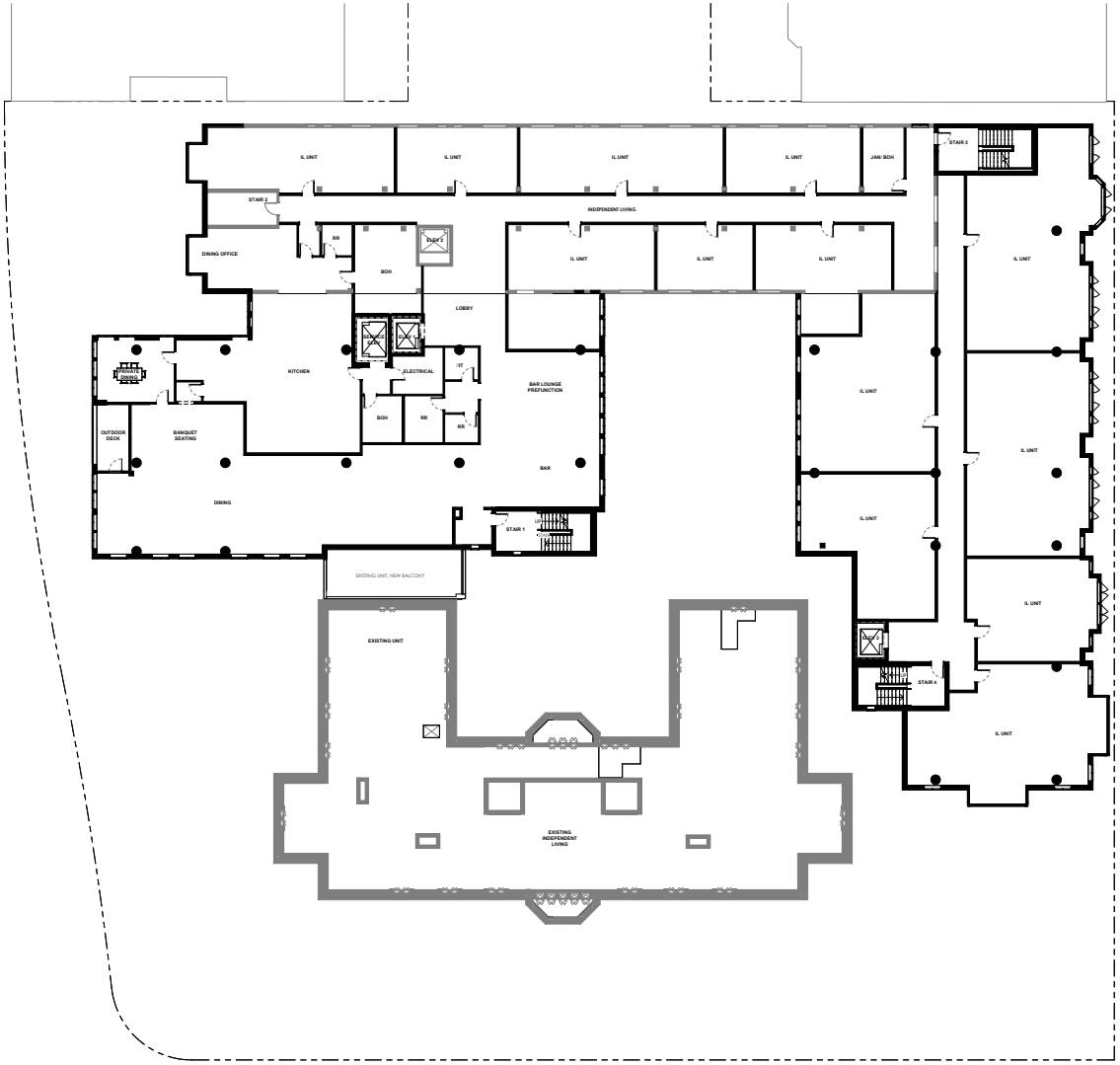


FIGURE 2-7

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 3

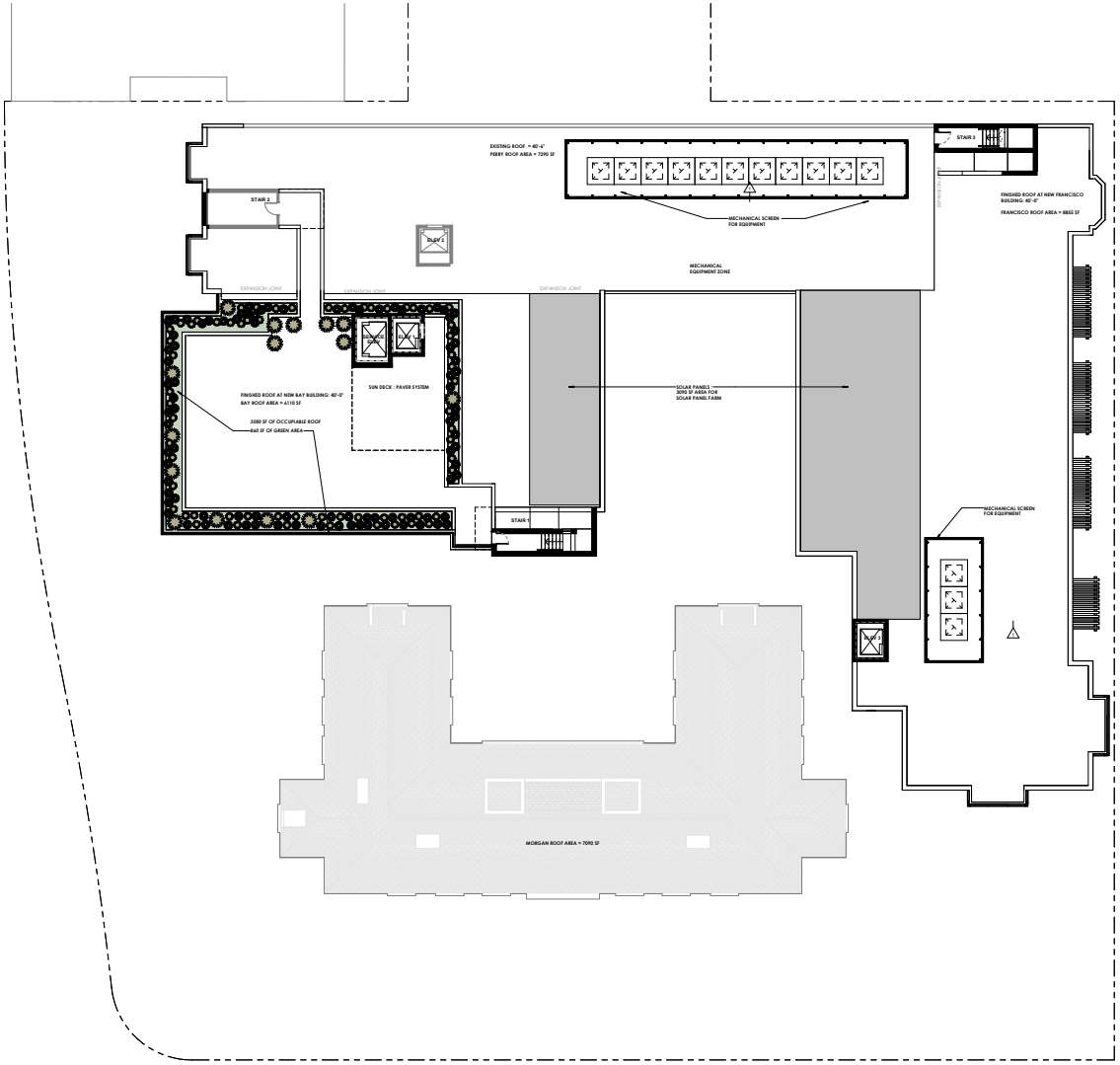


FIGURE 2-8

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Roof Level Plan



FIGURE 2-9

0 15 30
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – North and South



East Elevation



West Elevation

FIGURE 2-10

0 17.5 35
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – East and West



EXISTING



EXISTING



PROPOSED



PROPOSED

FIGURE 2-11

3400 Laguna Street Project

Existing Conditions and Proposed Project – Conceptual Sight Line Exhibits

SOURCE: HKS, Inc.



EXISTING



EXISTING



PROPOSED



PROPOSED

FIGURE 2-12

3400 Laguna Street Project

Existing Conditions and Proposed Project – Conceptual Sight Line Exhibits

SOURCE: HKS, Inc.

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

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

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

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

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

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

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

---

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

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

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

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

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

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

2.D.3 Project Sustainability Features

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

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

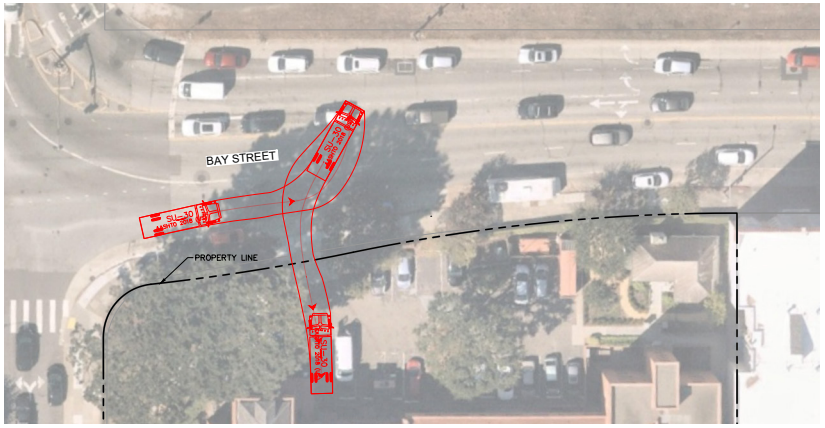
The proposed project would add two new bulb-outs per planning code section 138.1, Streetscape and Pedestrian Improvements. The first bulb-out would be installed at the intersection of Laguna and Bay streets and would project 6 feet into the Laguna and Bay streets rights-of-way. The bulb-out would extend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

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

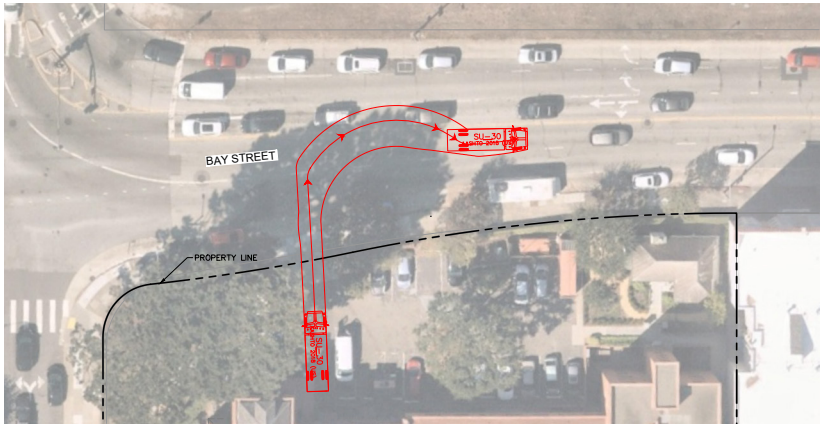
Loading access to the site would be modified such that smaller (30-foot or less) delivery vehicles would enter the site by approaching eastbound on Bay Street and backing into the service area via the

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

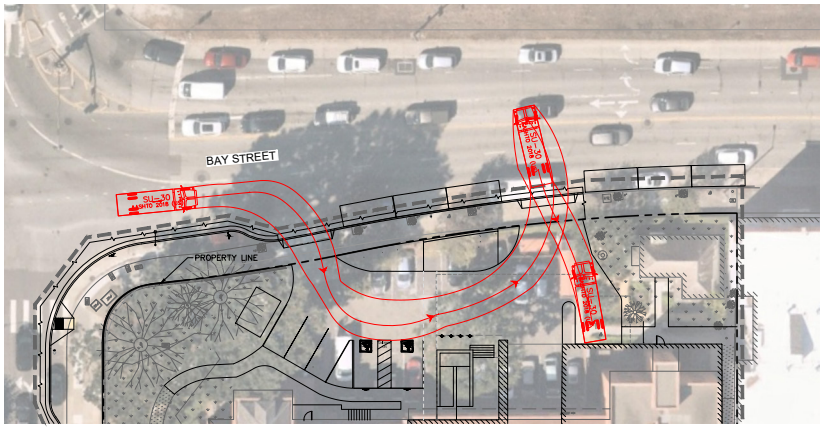
In total, the project would remove eight on-street parking spaces and would add 19 off-street parking spaces. The proposed project would add 12 Class 2 bicycle parking spaces in the public right-of-way (three located on Bay Street and nine located on Francisco Street); 18 Class 1 bicycle parking spaces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



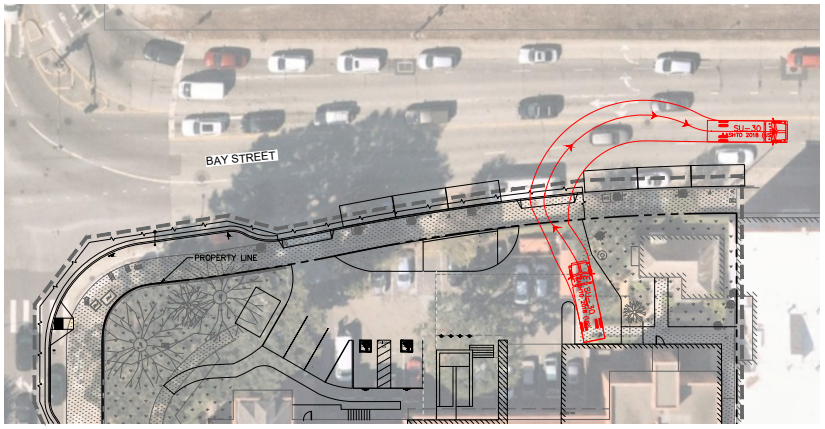
EXISTING LOADING ENTRY



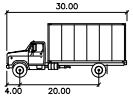
EXISTING LOADING DEPARTURE



PROPOSED LOADING ENTRY



PROPOSED LOADING DEPARTURE



SU–30

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

VEHICLE DATA

SU-30 LOADING TRUCK
HERITAGE ON THE MARINA

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

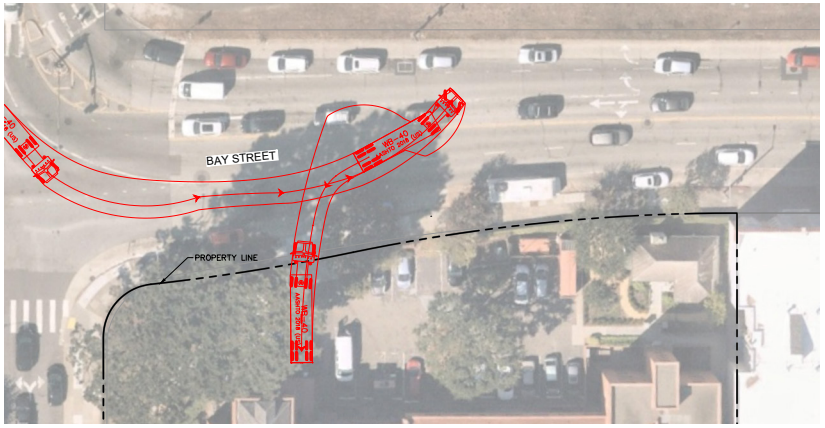
FIGURE 2-13



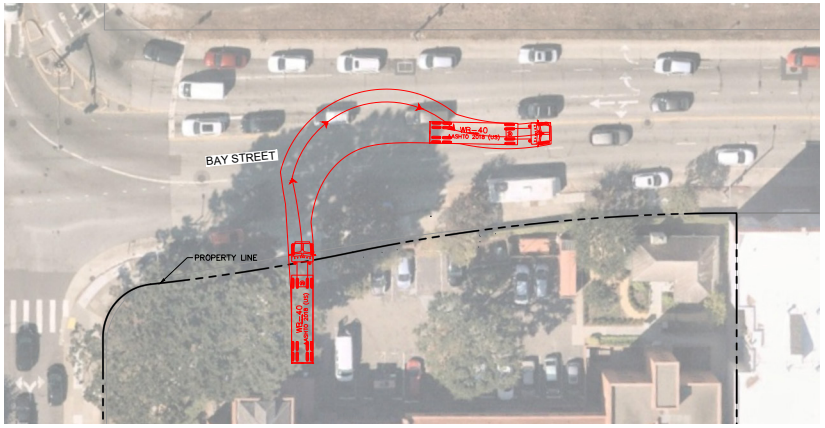
0 40 80
FEET

SOURCE: Kimley Horn

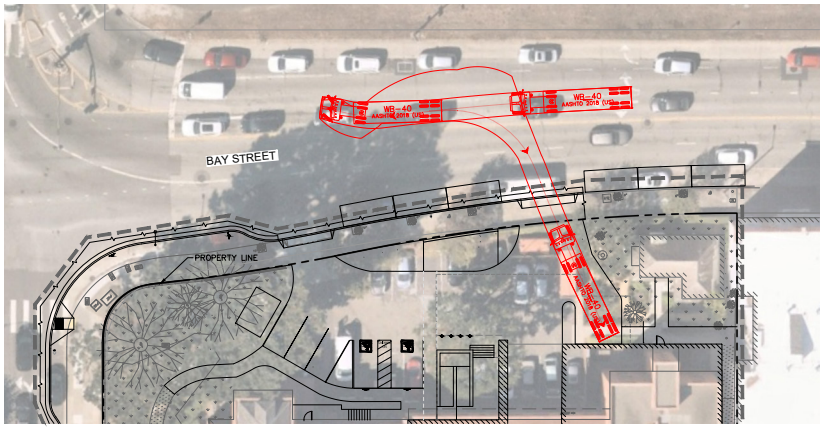
3400 Laguna Street Project
30-Foot Truck Entry and Departure



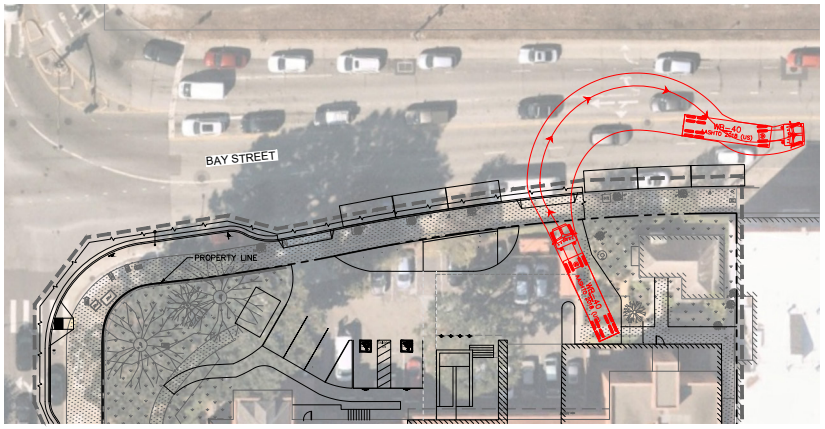
EXISTING LOADING ENTRY



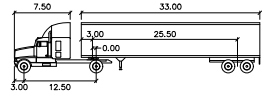
EXISTING LOADING DEPARTURE



PROPOSED LOADING ENTRY



PROPOSED LOADING DEPARTURE



WB-40

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

VEHICLE DATA

WB-40 LOADING TRUCK
HERITAGE ON THE MARINA

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

FIGURE 2-14

N

0 40 80
FEET

SOURCE: Kimley Horn

3400 Laguna Street Project
40-Foot Truck Entry and Departure

2.D.5 Open Space and Landscaping

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

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

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

2.D.6 Project Construction

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

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

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

2.D.7 Project Approvals

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

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

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

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

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

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

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

d. San Francisco Public Utilities Commission (SFPUC)

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

e. San Francisco Department of Public Health

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

f. San Francisco Fire Department

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

4. Actions by Other Government Agencies

a. Bay Area Air Quality Management District

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

CHAPTER 3 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

3.A Introduction to the Environmental Analysis

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

3.A.1 Scope of Analysis

Initial Study

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

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

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

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

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

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

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

3.A.2 CEQA Standards of Adequacy

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

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

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

3.A.3 Scope and Organization of this Chapter

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

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

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

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

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

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

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

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

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

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

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

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

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

3.A.4 Significance Determinations

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

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

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

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

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

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

3.A.5 Cumulative Impact Analysis

CEQA Requirements for Cumulative Impact Analysis

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

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

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

Approach to Cumulative Impact Analysis

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

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

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

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

Cumulative Environmental Setting

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

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

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

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

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3.B Historic Resources

3.B.1 Introduction

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

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

3.B.2 Definitions and Data Sources

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

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

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

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

3.B.3 Regulatory Framework

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

Federal Regulations

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

National Historic Preservation Act

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

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

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

National Register of Historic Places

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

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

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

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

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

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

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

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

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

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

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

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

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

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be

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

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

differentiated from the old and will be compatible with the historic materials, features, size, scale, and proportion, and massing to protect the integrity of the property and its environment.

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

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

State Regulations

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

California Register of Historical Resources

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

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

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

California Environmental Quality Act

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

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

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

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

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

Local Regulations, Plans, and Policies

San Francisco General Plan

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

Urban Design Element

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

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

Recreation and Open Space Element

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

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

Housing Element

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

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

San Francisco Planning Code

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

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

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

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

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

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

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

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

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

Cultural District Initiative

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

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

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

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

Legacy Business Registry

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

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

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

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

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

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

3.B.4 Environmental Setting

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

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

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

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

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

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

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

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

Historic Context

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

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

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

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

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

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

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

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

Historic Resource Evaluation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Period of Significance

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

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

Integrity of 3400 Laguna Street

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

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

Character-Defining Features[15]

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

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

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



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

FIGURE 3.B-1

3400 Laguna Street Project

Julia Morgan Building, Primary Façade

SOURCE: Page and Turnbull



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



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

FIGURE 3.B-2

3400 Laguna Street Project

Julia Morgan Building, North and East Façades

SOURCE: Page and Turnbull



Julia Morgan Building Front Lawn, viewed facing north.

FIGURE 3.B-3

3400 Laguna Street Project

Julia Morgan Building, Front Lawn

SOURCE: Page and Turnbull



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



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

FIGURE 3.B-4

3400 Laguna Street Project

Caretaker's Cottage

SOURCE: Page and Turnbull

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

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

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

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

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

Adjacent Historic Architectural Resources

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

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

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

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

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

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

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

3.B.5 Impacts and Mitigation Measures

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

Significance Criteria

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

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

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

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

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

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

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

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

Approach to Analysis

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

Approach to Cumulative Analysis

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

Impact Evaluation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Impacts to Nearby Historic Resources

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

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

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

Cumulative Impacts

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

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

3.C Air Quality

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

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

3.C.1 Environmental Setting

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

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

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

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

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

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

Climate and Meteorology

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

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

Ambient Air Quality – Criteria Air Pollutants

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Ozone

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

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

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

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

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

Carbon Monoxide

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

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

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

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

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

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

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

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

Nitrogen Dioxide

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

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

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

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

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

Sulfur Dioxide

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

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

Lead

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

Air Quality Index

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Toxic Air Contaminants and Local Health Risks and Hazards

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Roadway-Related Pollutants

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

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

Diesel Particulate Matter

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

San Francisco Modeling of Air Pollutant Exposure Zones

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

Excess Cancer Risk

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

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

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

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

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

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

Fine Particulate Matter

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

Health-Vulnerable Locations

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

Proximity to Freeways

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

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

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

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

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

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

Air Pollution Sources Near the Project Site

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

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

Stationary Sources

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

Traffic on Major Roadways

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

Sensitive Receptors

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

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

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

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

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

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

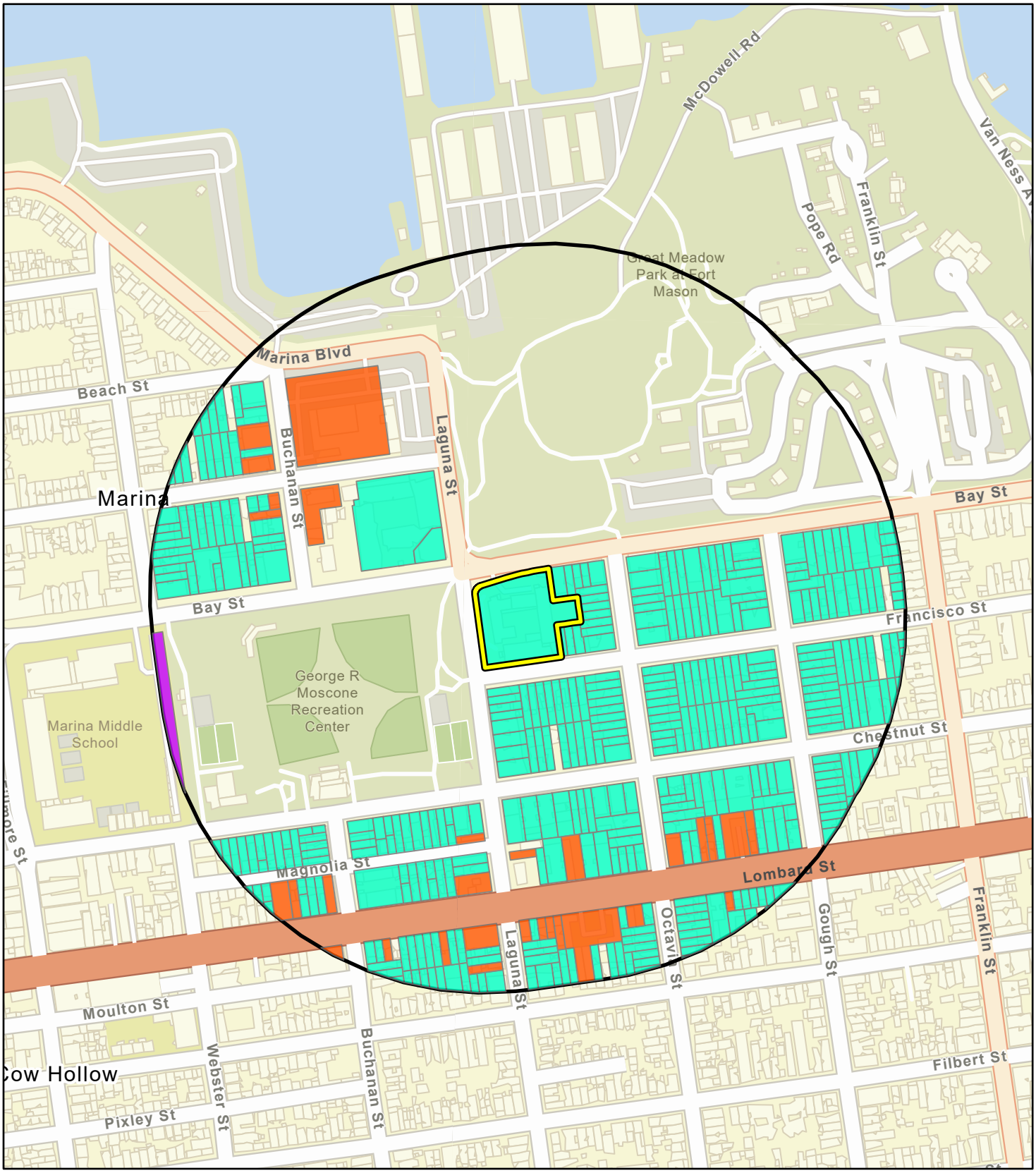


FIGURE 3.C-1

SOURCE: Esri World Street Map (2024)

3400 Laguna Street Project

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

Odors

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

3.C.2 Regulatory Framework

Federal Regulations

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

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

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

State Regulations

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

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

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

Toxic Air Contaminants

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

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

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

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

In-Use Off-Road Diesel-Fueled Fleets Regulation

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

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

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

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

Regional and Local Regulations

Bay Area Air Quality Planning

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

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

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

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

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

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

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

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

Air District Rules

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

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

San Francisco Dust Control Ordinance

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

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

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

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

Regulation of Odors

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

3.C.3 Impact Assessment Methodology

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

Significance Criteria

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

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

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

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

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

Approach to Analysis

Proposed Project Features

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

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

Methodology and Thresholds of Significance

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

Regional Criteria Air Pollutants

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

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

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

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

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

Table 3.C-5 Criteria Air Pollutant Significance Thresholds

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

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

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

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

Community Health Risk and Hazards

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

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

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

45 Ibid.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Cumulative Impact Assessment

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

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

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

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

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

3.C.4 Project Impacts and Mitigation Measures

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

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

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

Fugitive Dust

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

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

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

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

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

Criteria Air Pollutants

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

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

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

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

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

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

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

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

Health Risk Results

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

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

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

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

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

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

UTM = Universal Transverse Mercator

UTM X = eastward-measured distance

UTM Y = northward-measured distance

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

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

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

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

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

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

Mitigation Measures

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

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

A. Engine Requirements

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

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

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

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

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

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

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

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

Significance after Mitigation

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

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

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

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

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

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

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

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

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

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

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

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

3.C.5 Cumulative Impacts

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

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

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

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

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

CHAPTER 4 OTHER CEQA CONSIDERATIONS

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

4.A Growth Inducement

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

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

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

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

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

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

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

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

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

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

4.B Significant and Unavoidable Environmental Effects

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

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

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

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

4.C Significant Irreversible Changes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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CHAPTER 5 ALTERNATIVES

5.A Introduction

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

This chapter is divided into five subsections:

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

5.A.1 CEQA Requirements for Alternatives Analysis

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

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

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

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

5.B Alternatives Screening and Selection

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

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

5.B.1 Project Objectives

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

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

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

5.B.2 Strategies to Avoid or Lessen Significant Impacts

The draft EIR does not identify any significant and unavoidable impacts. All significant or potentially significant impacts from implementation of the proposed project would be mitigated to a less than significant level with incorporation of mitigation measures identified in the draft EIR and initial study. Although no significant and unavoidable impacts were identified for the proposed project, the alternatives were tailored to reduce impacts to the built historic resources identified on site by further minimizing construction activity on the project site. In addition, the alternatives were also tailored to minimize air quality and vibration impacts and impacts to archeological, tribal cultural, and biological resources by reducing the proposed amount of construction, including excavation, associated with the project.

5.B.3 Alternatives Selected for Detailed Analysis

Based on the screening process described above, the following alternatives were selected for detailed analysis in this draft EIR:

- **No Project Alternative:** Under the No Project Alternative, there would be no modifications to the existing buildings or landscaping at 3400 Laguna Street. The project site would remain as is and no construction, including excavation, would occur.
- **Rehabilitation Alternative:** The Rehabilitation Alternative would reconfigure the programming inside the existing buildings to add four new residential care suites. The existing buildings on the site would remain, with interior and exterior renovations to the Julia Morgan Building and interior renovations to all the remaining buildings. No ground disturbance would occur.
- **Reduced Construction Alternative:** The Reduced Construction Alternative would demolish the existing, non-historic Health Center and construct the new Francisco Building, including a basement and building height no greater than 40 feet. The Reduced Construction Alternative would add 12 new residential care suites and renovate the existing remaining buildings. This alternative would involve less excavation and a shorter construction timeline than the proposed project.

These three alternatives were determined to adequately represent the range of feasible alternatives required under CEQA for this project. These alternatives would lessen adverse impacts related to historic architectural resources, air quality, archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources that were identified for the proposed project.

Table 5-1, Comparison of Proposed Project and Alternatives summarizes and compares the characteristics of the proposed project with those of each project alternative. Detailed descriptions of each alternative are presented in Section 5.C, Alternatives Analysis, including the assumptions used in analyzing their environmental impacts. For each alternative, the descriptions include land uses and features that differ from the proposed project, and construction assumptions.

Table 5-1 Comparison of Proposed Project and Alternatives

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

Source: HKS Inc. (April 2024).
Note: References to 41-foot height reflect that the existing Perry Building has been measured at 40.5 feet tall, so with rounding is described as 41 feet tall. No changes to the Perry Building would increase its height and no other building on the project site would exceed 40 feet in height under the proposed project or any alternative.

CU/PUD = Conditional Use/Planned Unit Development

5.C Alternatives Analysis

This section presents a detailed description of each alternative and analysis of the selected alternatives' potential environmental impacts compared to the proposed project.

5.C.1 No Project Alternative

As required by CEQA Guidelines section 15126.6(e), a no project alternative is evaluated in this draft EIR to allow decision makers to compare the environmental effects of approving the proposed project with the effects of not approving the project. CEQA Guidelines section 15126.6(e)(2) requires that the no project alternative analysis "discuss the existing conditions … as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services." The no project alternative would not preclude development of the site by another project in the future. Currently, there are no other development proposals pending at the project site. Therefore, pursuant to CEQA Guidelines section 15126.6(e)(3)(B), the no project alternative for purposes of this analysis is considered "no build" wherein the existing environmental setting is maintained and is the circumstance in which the project does not proceed.

No Project Alternative Description

Under the No Project Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Thus, the project site would continue to operate as a residential care facility with the same number of existing care suites. The No Project Alternative would not result in demolition of the Perry Connector and the Health Center or construction of two new buildings (the Bay Building and the Francisco Building). The No Project Alternative would also not include renovations of the Julia Morgan Building or the Perry Building beyond ongoing maintenance. The gross square footage of building area on the project site would remain at 83,200 square feet and the number of residential suites would remain unchanged. Under the No Project alternative, there would be no construction of the below grade parking garage and no changes to on-street parking or loading, nor would the current off-street loading configuration change. There would be no replacement of the heating and cooling system, no elimination of natural gas service to existing buildings, and no energy or accessibility improvements. Additionally, there would be no changes to the landscaping on the project site.

The existing development controls on the project site would continue to govern site development and would not be changed. Similar to the proposed project, there would be no amendments to the general plan, planning code, or zoning map. The project site would remain under the existing RM-1 (Residential-Mixed, Low Density) Zoning District, and a 40-X Height and Bulk District.

No Project Alternative Impact Analysis

This environmental analysis assumes that the existing uses on the project site would not change and that the existing physical conditions described in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, and Appendix B, Initial Study, Section E, Evaluation of Environmental Effects, would remain the same. If the No Project Alternative were to proceed, no changes would be implemented, and none of the impacts associated with the proposed project would occur. However, incremental changes would be expected to occur in the vicinity of the project site as nearby reasonably foreseeable cumulative projects (see Section 3.A.5 of this draft EIR) are approved, constructed, and become operational. With no change to existing site conditions under the No Project

Alternative, land use activity on the project site would not contribute to significant cumulative impacts beyond existing levels.

Historic Architectural Resources

Under the No Project Alternative, as with the proposed project, the existing uses on the project site would not change, and the Caretaker's Cottage and the Front Lawn would remain unaltered. As with the proposed project no character-altering changes would be made to the Julia Morgan Building. Only essential repairs would be made to the Julia Morgan Building, which would not be rehabilitated. The lack of demolition or construction adjacent to the historic resources would avoid potential impacts due to construction, and no change in visual context would occur. Therefore, the less than significant with mitigation impact on historic architectural resources (Impact CR-1, Section 3.A, Historical Architectural Resources) attributable to the proposed project would not occur. Compared to the proposed project, the No Project Alternative would not have any project-level nor cumulative impacts related to historic architectural resources and would not require the implementation of mitigation measures.

Air Quality

Under the No Project Alternative, the existing uses on the project site would not change. There would be no demolition or construction of new buildings and therefore construction phase impacts to air quality (Impact AQ-4 and Impact C-AQ-2) would not occur. As such the mitigation measures developed for construction of the proposed project would not be required. Compared to the proposed project, the No Project Alternative would not have any project-level or cumulative impacts related to construction-period air quality and would not require the implementation of mitigation measures.

In addition, operationally the No Project Alternative would not result in any impacts related to applicable air quality plans, or any increase in cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin, or in other emissions (such as those leading to odors) adversely affecting a substantial number of people. The No Project Alternative would have no impact as it relates to these topics. However, the No Project Alternative would not include any of the proposed project's improvements to the existing facilities, including modernization of the on-site heating and cooling system and replacement of the facilities' existing emergency generator with one that would reduce existing air pollutant and toxic air contaminant emissions.

Other Issues Analyzed in the Initial Study

The initial study (Appendix B) of this draft EIR concluded that the proposed project would have no impacts or less than significant impacts related to the following environmental resource areas: land use and land use planning, population and housing, transportation, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, noise (besides construction vibration), energy resources, agriculture and forestry resources, and wildfire. The proposed project would require the implementation of mitigation measures to avoid or minimize significant construction related impacts to archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources.

The No Project Alternative would result in no project level or cumulative impacts related to any of these environmental topics as this alternative would not result in changes to existing site conditions. Since there would be no ground disturbance, new construction, tree removal, or use of vibration-

generating construction equipment at the site under the No Project Alternative, mitigation measures presented in the initial study would not be required under the No Project Alternative and all the less-than-significant impacts identified in the initial study would be avoided.

Ability of the No Project Alternative to Meet Project Objectives

As shown in Table 5-3, provided in Section 5.D below, the No Project Alternative would meet the project objective of maintaining the historic Julia Morgan Building and front lawn; but would not meet the other project objectives. Under the No Project Alternative, the existing residential care capacity on the project site would be retained, and no new building construction would take place, thus not meeting the project objectives related to increasing the number of senior care suites, modernizing the existing facilities or minimizing neighborhood on-street parking and loading demand.

5.C.2 Rehabilitation Alternative

The purpose of this alternative is to avoid or substantially reduce the less than significant with mitigation impact on historic resources that would occur under the proposed project.

Rehabilitation Alternative Description

Under the Rehabilitation Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Under the Rehabilitation Alternative, the proposed project would continue to operate as a residential care facility and would expand the number of residential care suites from 86 to 90, which would be 19 fewer suites than the proposed project. The Rehabilitation Alternative would not result in the demolition of the existing Perry Connector and the Health Center buildings or construction of two new buildings (the Bay Building and the Francisco Building).

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

Under the Rehabilitation Alternative, the interiors of the existing Health Center and Perry Connector buildings would also be renovated: the Health Center would become the front office area to ensure Americans with Disability Act compliant access and the Perry Connector Building would receive major upgrades, including updated mechanical systems.

The gross square footage of the project site would remain the same as the existing property at 83,200 gsf. Under the Rehabilitation Alternative, there would be no construction of the below-grade parking garage and no changes to on-street parking or loading operations, nor would the current off-street loading configuration change. Additionally, there would be no changes to the front lawn or interior courtyards' landscaping on the project site.

The existing development controls on the project site would continue to govern site development and would not be changed. Like the proposed project, there would be no amendments to the general plan, planning code, or zoning map. The project site would remain under the existing RM-1 (Residential-Mixed, Low Density) Zoning District, and a 40-X Height and Bulk District.

Rehabilitation Alternative Impact Analysis

Historic Architectural Resources

Under the Rehabilitation Alternative project impacts to historic resources would be minimized. Like the proposed project, modifications to the Julia Morgan Building would be in conformance with the Secretary of the Interiors Standards for Rehabilitation. The Rehabilitation Alternative would not alter the existing visual context of the two identified historic resources on site, the Julia Morgan Building and the Caretaker's Cottage, as it would not include any demolition or construction of buildings. Even though the Rehabilitation Alternative would include renovations of existing buildings, similar to the proposed project, the lack of new construction would avoid significant impacts related to changes in visual context. The Rehabilitation Alternative would not require implementation of Mitigation Measure M-CR-1 because the Rehabilitation Alternative would not include demolition or new construction that could potentially result in accidental damage to the on-site historic resources.

Similar to the proposed project, the Rehabilitation Alternative would not combine with cumulative projects to result in a significant impact on any of the identified historic resources in the adjacent vicinity. The Rehabilitation Alternative would be located at 3400 Laguna Street which has no aesthetic or historic relationship with the marina and the proposed project at 3400 Laguna Street does not have the potential to combine with the Marina Improvement and Remediation Project to negatively affect historic resources. As such, impacts would be less than significant, similar to the proposed project (albeit this alternative's historic resources impacts would be less than under the proposed project).

Air Quality

Under the Rehabilitation Alternative, the existing uses on the project site would not change. There would be no demolition or construction of new buildings and therefore significant impacts to construction-period air quality (Impact AQ-4 and Impact C-AQ-2) would not occur. As such, Mitigation Measure M-AQ-4 developed for the proposed project would not be required. Compared to the proposed project, the Rehabilitation Alternative would have less project-level and cumulative air quality impacts.

In addition, compared to the proposed project, the Rehabilitation Alternative would result in reduced project level impacts related to compliance with applicable air quality plans, cumulatively considerable net increases in non-attainment criteria air pollutants within the air basin, and other emissions (such as those leading to odors) adversely affecting a substantial number of people, as it would include a smaller development footprint than the proposed project.

Other Issues Analyzed in the Initial Study

The initial study (Appendix B) of this draft EIR concluded that the proposed project would have no impacts or less-than-significant impacts related to the following environmental resource areas: land use and land use planning, population and housing, transportation, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, noise (besides construction vibration), energy resources, agriculture and forestry resources, and wildfire. The proposed project

would require the implementation of mitigation measures to avoid or minimize significant construction-related impacts to archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources.

The Rehabilitation Alternative would result in no impacts related to any of these environmental topics because this alternative would result in no changes to existing site conditions. Due to the fact that there would be no ground disturbance, tree removal, use of vibration generating construction equipment, or new building construction at the site under the Rehabilitation Alternative, mitigation measures presented in the initial study would not be required under the Rehabilitation Alternative. All of the significant or potentially significant impacts identified in the initial study would be avoided or reduced and would either result in a less-than-significant or no impact finding, thus minimizing impacts compared to the proposed project.

Ability of the Rehabilitation Alternative to Meet Project Objectives

Under the Rehabilitation Alternative the residential care capacity would be slightly increased from existing conditions, with the addition of four new residential care suites, and no new building construction would take place, thus partially meeting the project objective related to increasing the availability of senior care facilities. While the Rehabilitation Alternative would partially meet the project objective of modernizing the existing facilities, by including the proposed renovations to the Julia Morgan Building and the Perry Building, it would create only four additional residential care suites, compared to 23 new suites under the proposed project. Therefore, while the Rehabilitation Alternative would meet the project objective of maintaining the historic Julia Morgan Building and front lawn, it would only partially meet the project objectives related to increasing the availability of senior care suites and modernizing the residential care facility and would not meet the objective related to minimizing on-street parking and loading demand in the neighborhood.

5.C.3 Reduced Construction Alternative

The purpose of this alternative is to reduce the proposed project's less-than-significant with mitigation impacts to historic architectural resources, construction-period air quality, archeological resources, human remains, tribal cultural resources, and building damage caused by construction vibration.

Reduced Construction Alternative Description

Under the Reduced Construction Alternative, the project site would not be developed with the proposed project as described in Chapter 2, Project Description, of this draft EIR. Instead, the project site would continue to operate as a residential care facility and would add 12 residential care suites for a total of 98, which would be 11 fewer suites than the proposed project. The Reduced Construction Alternative would have a smaller construction footprint than the proposed project, as it would result in the construction of only one new building, the proposed Francisco Building, and would retain the Perry Connector building. The proposed Francisco Building would be constructed in a similar manner and height (40 feet) as the proposed project. The Bay Building, as proposed by the project, would not be constructed under this alternative.

The Reduced Construction Alternative, similar to the proposed project, would renovate the interior and exterior of the existing Perry Building and the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, heating and cooling system

modernization, re-pointing of bricks where needed, and roof repairs, where needed, in conformance with the Secretary of the Interior's Standards for Rehabilitation. Within the Julia Morgan Building, the Reduced Construction Alternative would also reconfigure existing spaces to enable the addition of four new residential care suites and improve spaces for resident amenities. Under the Reduced Construction Alternative, the interior of the existing Perry Connector Building would be renovated, and the amenities spaces would be redesigned.

The Reduced Construction Alternative would not construct the underground parking structure, but it would require the excavation of approximately 600 cubic yards of soil up to 15 feet deep to enable construction of below-grade common areas beneath the proposed Francisco Building. The Reduced Construction Alternative would retain the existing on-site parking and would be required to implement bulb out improvements similar to the proposed project.

Reduced Construction Alternative Impact Analysis

Historic Architectural Resources

Under the Reduced Construction Alternative, the project impacts to historic resources would be reduced. The Reduced Construction Alternative would still require the implementation of Mitigation Measure M-CR-1: Best Practices and Construction Monitoring Program for Historic Resources, as it would include construction adjacent to the Julia Morgan Building that could potentially result in accidental damage to the building. The Reduced Construction Alternative would reduce changes to the visual context of the two identified historic resources on the project site, the Julia Morgan Building and the Caretaker's Cottage, compared to the proposed project. This alternative would only include the construction of the proposed Francisco Building and would retain the Perry Connector building. Even though the Reduced Construction Alternative would include proposed renovations similar to the proposed project, the reduced construction would result in fewer changes in the visual context of the onsite historic buildings and would minimize potential impacts due to construction. Additionally, the Reduced Construction Alternative would require the use of vibration generating construction equipment that could also result in damage to onsite historic resources, requiring implementation of Mitigation Measure M-NO-2: Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction. With implementation of M-CR-1 and M-NO-2 the Reduced Construction Alternative would have a less than significant impact to historic resources, similar to the proposed project (albeit this alternative's historic resources impacts would be less than under the proposed project).

Air Quality

Similar to the proposed project, the Reduced Construction Alternative would include demolition and grading activities as part of project construction. The Reduced Construction Alternative would result in 600 cubic yards of ground disturbance, compared to the 9,600 cubic yards for the proposed project. The reduced amount of ground disturbance would translate into a reduction in truck trips and use of construction equipment and associated emissions. As such, the Reduced Construction Alternative would have reduced air quality impacts compared to the proposed project. Therefore, like the proposed project, the Reduced Construction Alternative would result in less than significant construction and operational criteria air pollutant emissions.

The Reduced Construction Alternative would potentially result in concentrations of construction cancer risk and $PM_{2.5}$ concentrations from the proposed construction that could result in significant

impacts to the nearest off-site residential and childcare receptors, and as such Mitigation Measure M-AQ-4: Requirements for Off-Road Construction Equipment, would still be required. Similar to the proposed project, the Reduced Construction Alternative would result in a less-than-significant impact with Mitigation Measure M-AQ-4. Compared to the proposed project, the Reduced Construction Alternative would result in reduced impacts to air quality.

In addition, compared to the proposed project, the Reduced Construction Alternative would result in reduced project-level impacts related to applicable air quality plans, cumulatively considerable net increases in non-attainment criteria air pollutants within the air basin, and other emissions (such as those leading to odors) adversely affecting a substantial number of people, as it would include a smaller development footprint than the proposed project.

Other Issues Analyzed in the Initial Study

The initial study (Appendix B) of this draft EIR concluded that the proposed project would have no impacts or less-than-significant impacts related to the following environmental resource areas: land use and land use planning, population and housing, transportation, greenhouse gas emissions, wind, shadow, recreation, utilities and service systems, public services, geology and soils, hydrology and water quality, hazards and hazardous materials, mineral resources, noise (besides construction vibration), energy resources, agriculture and forestry resources, and wildfire. The proposed project would require the implementation of mitigation measures to avoid or minimize significant construction related impacts to archeological resources, human remains, tribal cultural resources, construction vibration, and biological resources.

Compared to the proposed project, impacts resulting from ground disturbance would be reduced due to the smaller footprint of construction and excavation; therefore, any potential impacts related to archeological resources, human remains, and tribal cultural resources would be less. Nevertheless, the Reduced Construction Alternative would result in some ground disturbance and new construction at the site, and this alternative has the potential to significantly impact below ground resources. This alternative would also require the use of vibration generating construction equipment that could damage the remaining buildings on the site. Additionally, the Reduced Construction Alternative would require the removal of 10 trees on the project site, which could provide nesting habitat for avian species. As such, all mitigation measures presented in the initial study would be required under the Reduced Construction Alternative, and all of the potentially significant impacts identified in the initial study would be less than significant with mitigation. However, the Reduced Construction Alternative would result in reduced impacts related to these environmental topics as it would include smaller scale changes to the project site compared to the proposed project.

Ability of the Reduced Construction Alternative to Meet Project Objectives

The Reduced Construction Alternative would meet the objective of maintaining the historic resources on the site and would partially meet two project objectives through an increase of 12 residential care suites on the project site (compared to an increase of 23 new suites under the proposed project) and partial modernization of facilities. Under the Reduced Construction Alternative, the bulb-out street improvements would be constructed, while current off-street parking facilities and loading conditions would not be improved. Therefore the Reduced Construction Alternative would not meet the project objective related to minimizing neighborhood on-street parking and loading demand.

5.D Comparison of Alternatives and Environmentally Superior Alternative

5.D.1 Alternatives Summary of Impacts and Ability to Meet Project Objectives

Table 5-2, Comparison of Environmental Impacts of the Proposed Project and Alternatives identifies the level of impact for the proposed project and each alternative (e.g., no impact, less than significant impact, less-than-significant impact with mitigation) and whether the impact of the alternative would be the same as, less than, or greater than the proposed project impacts. In some cases, the proposed project and alternative would result in the same significance determination, but the degree of that impact with the alternative might be less than, greater than, or similar to that of the proposed project. When an alternative's impact would be less than the proposed project, the "<" symbol is used to represent reduced impacts; for similar or equal impacts, the "=" sign is used.

Table 5-2 Comparison of Environmental Impacts of the Proposed Project and Alternatives

Environmental Impact	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
EIR Section 3.B, Historic Resources				
Impact CR-1: The proposed project may cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code.	LTSM	NI <	LTS <	LTSM <
Impact-C-CR-1: The proposed project, in combination with cumulative projects, may cause a substantial adverse change in the significance of a historical resource.	LTS	NI <	LTS <	LTS <
EIR Section 3.C, Air Quality				
Impact AQ-2: The proposed project's construction activities would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the basin.	LTS	NI <	LTS <	LTS <

Table 5-2 Comparison of Environmental Impacts of the Proposed Project and Alternatives

Environmental Impact	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
Impact AQ-4: The proposed project would expose sensitive receptors to substantial pollutant concentrations.	LTSM	NI <	LTS <	LTSM <
Impact C-AQ-4: Construction of the proposed project, in combination with cumulative projects, would expose sensitive receptors to substantial pollutant concentrations.	LTSM	NI <	LTS <	LTSM <
INITIAL STUDY – LESS THAN SIGNIFICANT WITH MITIGATION TOPICS				
Section E.4, Cultural Resources				
Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archeological resource.	LTSM	NI <	LTS <	LTSM <
Impact CR-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries.	LTSM	NI <	LTS <	LTSM <
Section E.5, Tribal Cultural Resources				
Impact TC-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant.	LTSM	NI <	LTS <	LTSM <
Section E.7, Noise				
Impact NO-2: The proposed project would generate excessive	LTSM	NI <	LTS <	LTSM <

Table 5-2 Comparison of Environmental Impacts of the Proposed Project and Alternatives

Environmental Impact	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
groundborne vibration or groundborne noise levels.				
Section E.15, Biological Resources				
Impact BI-1: The proposed project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	LTSM	NI <	LTS <	LTSM <

Source: Compiled by LSA (2024).
Impact Codes:
NI = no impact
LTS = less than significant
LTSM = less than significant with mitigation
= (equal to proposed project's impact)
< (less than proposed project impact)

A comparison of each alternative and its ability to meet the project objectives compared to the proposed project is summarized below in **Table 5-3, Alternatives Ability to Meet Project Objectives** below. As shown in the table, and described under each alternative discussion above, the No Project Alternative would meet the project objective of maintaining the historic Julia Morgan Building and Caretaker's Cottage and it would not meet any of the other project objectives, as it would not add any additional senior housing suites, would not modernize existing structures and would not minimize on-street loading and parking demand in the surrounding neighborhood.

Table 5-3 Alternatives Ability to Meet Project Objectives

Project Objectives	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
Meet area senior care demands by increasing the number of care suites and making operational improvements.	Yes	No	Partial	Partial
Modernize the existing residential care facility to continue attracting new	Yes	No	Partial	Partial

Table 5-3 Alternatives Ability to Meet Project Objectives

Project Objectives	Proposed Project	No Project Alternative: No Project Alternative	Rehabilitation Alternative: Rehabilitation Alternative	Reduced Construction Alternative: Reduced Construction Alternative
residents and provide high-quality care and services for seniors in San Francisco.				
Maintain the historic Julia Morgan Building, Caretaker's Cottage, and original landscape features of the front lawn on the project site.	Yes	Yes	Yes	Yes
Minimize neighborhood on-street parking and loading demand by building adequate parking and loading access on-site to serve the needs of project residents, workers, suppliers, and visitors.	Yes	No	No	No

Source: Compiled by LSA (2024).

The Rehabilitation Alternative would include the construction of 4 additional care suites and would include improvements to the existing structures. The Rehabilitation Alternative would include the renovation of the existing Julia Morgan Building and the Perry Building, and rehabilitation of the façade of the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, heating and cooling system modernization, re-pointing of bricks where needed, and roof repairs, where needed, in conformance with the Secretary of the Interior's Standards for Rehabilitation. The Rehabilitation Alternative would partially meet the first objective related to increasing the number of care suites and making operational improvements; however, the number of new care suites added would be substantially fewer than under the proposed project. The Rehabilitation Alternative would partially meet the objective to modernize the existing residential care facility, as it would include some of the same improvements as the proposed project but would not replace the 1950s-era Perry Building Connector and Health Center buildings. The Rehabilitation Alternative would meet the objective to maintain the historic Julia Morgan Building and Caretaker's Cottage, as it would maintain the historic features of the eligible structures. This alternative would not meet the project objective related to minimizing on-street parking and loading demand, as it would add additional care suites but not change the off-street parking and loading configuration.

The Reduced Construction Alternative would include the construction of an additional 12 suites and would include improvements to the existing structures. The Reduced Construction Alternative, similar to the proposed project, would renovate the interior and exterior of the existing Perry Building and the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, heating and cooling system modernization, re-pointing of bricks where

needed, and roof repairs, where needed, in conformance with the Secretary of the Interior's Standards for Rehabilitation. The Reduced Construction Alternative would partially meet the objective related to increasing the number of care suites; however, it would be substantially fewer suites than the proposed project. The Reduced Construction Alternative would partially meet the objective to modernize the existing residential care facility, but it would not include the Bay Building, which is a key component of the proposed project's planned modernization of residential amenities. This alternative would maintain the historic features of the eligible structures, similar to the improvements under the proposed project, and would meet the objective to maintain the historic resources on the project site. This alternative would be required to implement bulb out improvements similar to the proposed project. However, it would not meet the objective related to minimizing on-street parking and loading demand (unlike under the proposed project), as it would add residential care suites and reduce the number of on-street parking spaces through installation of the bulb out, without changing the project site's off-street parking or loading capacity.

5.D.2 Environmentally Superior Alternative

CEQA Guidelines section 15126.6(e) requires an EIR to identify the alternative to the proposed project that would have the least adverse environmental impacts (i.e., the "environmentally superior alternative"). Based on the analysis and comparison of the impacts of the alternatives presented above, the No Project Alternative would be the environmentally superior alternative as it would result in no impacts. While the No Project Alternative would cause fewer environmental impacts compared to the proposed project, CEQA Guidelines section 15126.6(e)(2) provides that if the "no project" alternative is the environmentally superior alternative, the EIR should also identify an environmentally superior alternative in addition to the No Project Alternative.

As shown above, the Rehabilitation Alternative would develop an additional 4 suites on the project site and increase the number of available suites from 86 to 90. Compared to the proposed project, the Rehabilitation Alternative would avoid impacts associated with historic resources and would not require the implementation of mitigation measures associated with built historic resources, as would be required under the proposed project. In addition, the Rehabilitation Alternative would minimize potential impacts to below ground resources, would not require the use of vibration-generating construction equipment, and would reduce potential construction air quality impacts. Additionally, mitigation measures presented in the initial study for the proposed project would not be required under the Rehabilitation Alternative. All of the significant or potentially significant impacts identified in the initial study would be avoided or reduced and would either result in a less-than-significant or no impact finding, thus minimizing impacts compared to the proposed project. As such, the Rehabilitation Alternative is considered the environmentally superior alternative.

5.E Alternatives Considered but Rejected

CEQA Guidelines section 15126.6(c) requires an EIR to identify alternatives that were considered by the lead agency throughout the planning process but were ultimately rejected from detailed analysis. The following alternatives were considered but were ultimately rejected for the reasons described below.

5.E.1 Off-Site Alternative

CEQA Guidelines section 15126.6 (a) states that an EIR "shall describe a range of reasonable alternatives to the project *or* to the location of the project, *which would feasibly attain most of the basic objectives of the project* but would avoid or substantially lessen any of the significant effects of the project …" (emphasis added). Because the proposed project's objectives are grounded in continuing Heritage on the Marina's historic use as a residential care facility for seniors, there is no alternative location that could meet this fundamental project objective. Development of an off-site alternative would not meet the objective of modernizing the existing facility. An alternative that would develop senior care suites off-site would only partially meet the objective related to increasing the number of care suites and making operational improvements; new residents of off-site care suites would not benefit from the existing operations at the existing Heritage on the Marina site at 3400 Laguna Street. An off-site alternative would meet the objective of maintaining the historic resources at the site. An off-site alternative would partially meet the objective of minimizing on-street parking and loading demand due to expanding the number of residents and employees offsite.

Under CEQA Guidelines section 15126.6(f)(3), an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. There are no off-site properties nearby that are comparable to the project site.

For both of these reasons, no off-site alternative was carried forward for detailed evaluation.

5.E.2 Reduced Construction (Bay Building Only) Alternative

A second reduced construction alternative was considered for analysis which would include construction of the new Bay Building only, whereas the Reduced Construction Alternative evaluated above includes construction of the Francisco Building only. Such an alternative would only construct the new Bay Building and retain the existing Health Center building in its current condition. This alternative would reduce the proposed project's footprint by approximately 2,000 square feet; however, it would only allow the development of six additional care suites (17 fewer than the proposed project and 6 fewer than the Reduced Construction Alternative). The new Bay Building would include the same uses as those proposed under the proposed project. Under both the proposed project and the rejected potential alternative, construction of the new Bay Building would result in a net increase of two care suites, and four additional care suites would be added within the Julia Morgan Building. In contrast to the proposed project, the rejected potential alternative would not include construction of the new Francisco Building, therefore no additional care suites could be added within that portion of the project site.

The Reduced Construction Alternative (proposed Bay Building only) would require approximately 3,800 cubic yards of excavation, which is 5,800 square feet less than the proposed project but 3,200 square feet more than the Reduced Construction Alternative evaluated above. The Reduced Construction Alternative (proposed Bay Building only) was not further considered as it would have greater ground disturbance and greater impacts to below grade resources such as archeological and tribal cultural resources and human remains than the studied alternatives. In addition, this rejected alternative would result in similar impacts to the proposed project, and therefore would not provide any additional information that is not already considered and evaluated in the above analysis of alternatives. Such an alternative would also not meet the project objectives to the same extent than the identified and evaluated Reduced Construction Alternative already achieves.

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CHAPTER 6 REPORT PREPARATION

6.A San Francisco Planning Department, City and County of San Francisco (Lead Agency)

6.A.1 Environmental Planning Division

49 S. Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Environmental Review Officer: Lisa Gibson
Deputy Environmental Review Officer: Devyani Jain
Principal Environmental Planner: Joy Navarrete
CEQA Cultural Resource Team Manager: Allison Vanderslice
Senior Environmental Planner: Megan Calpin
Senior Preservation Planner: Justin Greving

6.B Environmental Consultants

6.B.1 LSA Associates (Prime Environmental Consultants)

157 Park Place
Point Richmond, CA 94801

Principal in Charge and Project Manager: Theresa Wallace
Associate, Director of Air Quality: Jessica Coria
Associate, Air Quality: Cara Cunningham
Principal, Noise: JT Stephens

6.C Historic Preservation Consultants

6.C.1 Page and Turnbull

170 Maiden Lane, 5th Floor
San Francisco, CA 94108

Principal: Carolyn Kiernat

6.D Project Sponsor Team

6.D.1 Heritage on the Marina

3400 Laguna Street
San Francisco, CA 94123

CEO: Mary Linde

6.D.2 Rockwood Pacific Inc.

36 Southwood Drive
Orinda, CA 94562

Frank Rockwood

6.D.3 Perkins Coie, LLP

505 Howard Street Suite 1000
San Francisco, CA 94105

Project Attorney: Alan Murphy
Project Attorney: Julie Jones

6.D.4 GBA Inc.

210 Noe Street
San Francisco, CA 94114

Eric Jacobs

APPENDIX A
NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND COMMENTS RECEIVED

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SUB-APPENDIX A.1
NOTICE OF PREPARATION (CIRCULATED NOVEMBER 1, 2023)

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San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

PUBLIC NOTICE

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date:	November 1, 2023
Comment Deadline:	December 1, 2023
Case No.:	2022-009819ENV
Project Address:	3400 Laguna Street
Zoning:	RM-1 (Residential – Mixed, Low Density) Use District
Height/Bulk:	40-X District
Block/Lot:	0471/003
Lot Size:	68,005 square feet
Neighborhood:	Marina
Supervisor District:	District 2, Catherine Stefani
Cross Streets:	East side of Laguna Street between Bay and Francisco streets
Staff Contact:	Jeanie Poling – (628) 652-7559, jeanie.poling@sfgov.org

Introduction

The San Francisco Planning Department (department) prepared this notice of preparation of an environmental impact report (EIR) in connection with the proposed 3400 Laguna Street project (proposed project). The purpose of the EIR is to provide information regarding the physical environmental effects of the proposed project; identify possible ways to minimize any potentially significant adverse effects; and describe and analyze possible alternatives to the proposed project. The department is issuing this notice to inform the public and responsible and interested agencies about the proposed project and the intent to prepare an EIR; and to solicit comments on the scope of the EIR. This notice also identifies environmental issues anticipated to be analyzed in the EIR. The comments received during the public scoping process will be considered during preparation of the EIR for this project.[1]

This notice is available for public review on the department's website at sfplanning.org/sfceqadocs and at the San Francisco Permit Center's document viewing room on the second floor of 49 South Van Ness Avenue, San Francisco, CA 94103.

[1] The EIR will also be informed by comments received in response to the Planning Department's "Notification of Project Receiving Environmental Review" distributed on May 30, 2023. After that notice, the department determined to prepare an EIR.

Project Description

Project Location and Site Characteristics

The approximately 68,090-square-foot[2] (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The project site slopes upward from west to east from approximately 30 to 40 feet above mean sea level.

The project site has been occupied by the Heritage on the Marina residential care retirement community since 1925. Heritage on the Marina consists of five existing structures of approximately 83,200 gross square feet (gsf): the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage, which are further described below.[3]

- The **Julia Morgan Building** is a U-shaped building that is three stories and approximately 40 feet in height; it was built in 1925. The primary façade of the building faces west and is viewed from Laguna Street. The building has a partially exposed basement level and an attic story penthouse over the east portion of the front façade. The building serves as the primary pedestrian entrance to the site.[4]

- The **Perry Building Connector** is a rectangular building that is two stories and approximately 22 feet in height over a partially raised basement; it was built in 1957. The Perry Building Connector runs east to west to connect the Morgan Building to the Perry Building forming an L-shaped footprint.

- The **Perry Building** is a rectangular building that is four stories and approximately 41 feet in height over a partially raised basement; it was built in 1957. The building has an enclosed fire access stair on the Bay Street side that projects about 8 feet above the roofline and the existing elevator penthouse extends about 16 feet above the roofline.

- The **Health Center** is a rectangular building that is one story and approximately 15 feet in height; it was built in 1963. The Health Center runs east to west and intersects the Perry Building on its southeast corner.

- The **Caretaker's Cottage** is an L-shaped structure that is one story and 22 feet in height; it was built in 1925. It is located on the northeast corner of the property enclosed within a wood fence and gate.

The Morgan Building, the Perry Building Connector, the Perry Building, and the Health Center all surround a central courtyard. There is a second courtyard east of the Perry Building on the eastern boundary of the project site. The site also contains a front lawn that is located between the existing entrance to the Julia Morgan building and Laguna Street. (See **Figure 1, Project Vicinity Map** and **Figure 2, Existing Site Plan**).

The project site has approximately 45 feet of passenger loading (white curb) and 20 feet of accessible parking (blue curb) on the Laguna Street frontage and 22 feet of loading (white curb) on the Francisco Street

[2] All square footages are approximate and rounded to the nearest multiple of ten.
[3] Adjacent properties at 1530 Francisco Street, 1536-1538 Francisco Street, and 3325-3327 Octavia Street are also owned and operated by Heritage on the Marina but are not part of the project site and no changes to these facilities are proposed.
[4] Although this building serves as the primary pedestrian entrance to the site, it is non-compliant with Americans with Disabilities Act (ADA) accessibility requirements and the entrance along Francisco Street is instead used for ADA access.

frontage. The project site includes 17 off-street vehicle parking spaces and one off-street loading space, which are accessible via an existing 18-foot-wide driveway along Bay Street. Pedestrian access to the site is provided via gates along Laguna Steet that access internal sidewalks connecting to the Julia Morgan Building entrances and additional accessible entrances from Bay Street.

The project site is not listed in the National Register of Historic Places or the California Register of Historical Resources, nor is it a local San Francisco article 10 landmark, but the site is eligible for listing in the California Register of Historical Resources.

Proposed Project Characteristics

The proposed project would continue to operate as a residential care facility. The proposed project would demolish two of the five existing buildings (the Perry Connector and the Health Center) and construct two new buildings (the Bay Building and the Francisco Building) of heights not to exceed 40 feet in height (excluding rooftop appurtenances) and in the same locations as the demolished structures. The proposed project would also renovate two of the other three existing buildings on the site (the Perry Building and the Caretaker's Cottage), as further described below. In total, the proposed project would add approximately 58,380 square feet of net new institutional use resulting in an approximately 141,580 gsf residential care facility and increase the number of residential care suites by 23 from 86 to 109. **Table 1, Proposed Project Details** provides a summary of the proposed project compared to existing conditions.

Table 1 Proposed Project Details

	Existing	Proposed	Net Change
Number of Building(s)	5	5	0
Building Stories[1]	4	4	0
Maximum Building Height (feet)[1]	40	40	0
Building Gross Square Feet (gsf)	83,200	141,580	+58,380
Residential Care Units	86	109	+23
Useable Open Space (square feet)	26,410	30,280	+3,870
Off-Street Parking (spaces)	17	36	+19
Off-Street Loading Spaces	1	1	0
On-Street Loading Spaces	0	0	0

SOURCE: GBA Inc., 2023.

[1] Reflects the maximum building height and number of stories as these vary across the site.

NOTE: All gsf numbers are rounded to the nearest multiple of 10.

Gsf = gross square feet

Figure 3, Proposed Site Plan depicts the overall proposed site plan; **Figures 4 through 7** depict the proposed floor plans for the basement, ground floor, representative upper floors (level 2); and roof levels. **Figures 8 through 9** depict the proposed building elevations.

New Construction

The new Bay Building and new Francisco Building would both be four stories and approximately 40 feet in height. The new Bay Building would be approximately 31,300 gross square feet and include a resident's roof

deck, independent living units, assisted living amenities, memory support accommodations, reception, lounge, administration and laundry. The new Francisco Building would be approximately 47,100 gross square feet and include independent living units, support areas (fitness, physical therapy, arts and crafts) and staff facilities.

The proposed new Bay Building and new Francisco Building would have flat roofs at similar elevation as the Perry Building. The new Bay Building also would include a roof deck consisting of 3,549 square feet of common open space surrounded by perimeter planters and positioned on the Bay Street side of the project site away from neighboring residences. The roof deck would be serviced by two elevators (service elevator and passenger elevator) with a small shade trellis (approximately 500 square feet). The new elevators would have penthouses that would be shorter than the existing Perry Building elevator penthouse. Three new staircases would be added to access the roof. None of the permitted obstructions would be taller than the existing roof access stair projection of the existing Perry Building. The Bay Building's new staircase would be adjacent to the internal courtyard, as would one of the Francisco Building's two staircases. The other stair for the Francisco Building located at the building's southeast corner would utilize a sloped roof condition consistent with the design guidelines.

To meet CALGreen[5] requirements, the project would utilize a mechanical system which requires use of rooftop HVAC compressors. The system has not been designed, but the compressors can range from 4 to 10 feet in height above the roof level (depending on the system design). The compressors would be grouped together in screened enclosures, as far away as practical from the roof perimeter along the adjoining streets. The screen enclosure height would match the equipment height. In addition, about a third of roof area not occupied by the roof terrace/mechanical equipment would host a solar panel array. The panels would have a tilt to optimize performance but would not project appreciably above adjacent parapets. The proposed project would decrease the total roof area from 34,360 square feet to 31,930 square feet to accommodate the solar panels; new buildings would meet Title 24 requirements for photovoltaic solar panels on building flat roof areas.

The existing emergency backup diesel power generator, located adjacent to the Bay Street frontage, would be replaced by a new Tier 4 emissions emergency backup diesel generator located inside the new Bay Building.

A new basement level garage would be constructed beneath the Bay and Francisco buildings and the existing interior courtyard. The basement level would include 31 vehicular parking spaces for use by staff and residents, including one car-share space, and 18 bicycle parking spaces. A new two-directional, 20-foot-wide driveway on Bay Street would provide access to the new basement, east of the existing entrance. Vehicles would be restricted to right-only turns into and out of the driveway. The new driveway would necessitate the removal of the 17 existing project site surface parking spaces and approximately 15 feet of street parking along Bay Street. At this location, along the Bay Street side of the project site, an off-street covered porte cochère with zero curbs and accessibility ramps would provide universal access required by the residential care facility. The existing driveway on Bay Street, west of the new driveway, would provide access to five project site surface parking spaces. In total, the project would add 19 net new parking spaces to the project site. The proposed project would also add 12 new bicycle parking spaces in the public right-of-way (three located on Bay Street and nine located on Francisco Street).

[5] CalGreen is the California Green Buildings Standards Code, Part 11, Title 24, California Code of Regulations.

Changes to Existing Buildings

The proposed project would:

- renovate the interior of the existing Caretaker's Cottage,
- renovate the interior and exterior of the existing Perry Building, and
- rehabilitate the façade of the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, HVAC modernization, re-pointing[6] of bricks where needed, and roof repairs where needed.

There would be no change to the building massing, number of stories or height of the Julia Morgan Building, Perry Building, and the Caretaker's Cottage.

Open Space

The project would increase usable open space at the project site from approximately 26,410 square feet to approximately 30,280 square feet, an increase of approximately 3,870 square feet of open space. The proposed project would preserve the existing open lawn space in front of the Julia Morgan Building and in the courtyard to the rear of the project site. The proposed project would renovate and augment the size of the original central courtyard and would install an adjoining courtyard on the same level. The proposed project would also create an art garden in the approximate location of the existing garden at the southwest portion of the project site. Additionally, the project would add 3,550 square feet of common open space and 940 square feet of green area on the roof of the new Bay Building.

Demolition and Construction

Construction of the project would take approximately 29 months. The proposed new buildings would be constructed on mat foundations, and no impact or vibratory pile driving techniques would be used. The proposed project would require the excavation of 9,060 cubic yards of soil to a maximum depth of 15 feet below ground surface. The total area of soil disturbance would be 29,750 square feet. Construction is scheduled for Monday through Friday, from 7:00 a.m. to 8:00 p.m., with no nighttime construction to occur.

Project Approvals

The proposed project requires the following approvals from the San Francisco Planning Commission: Conditional Use Authorization (planning code sections 209.2 and 303); and Planned Unit Development, including an exception to a rear yard requirement (planning code section 304).

Summary of Potential Environmental Issues

The proposed project could result in potentially significant environmental effects. Therefore, the department will prepare an initial study and EIR to evaluate the physical environmental effects of the proposed project. The initial study will be published as an appendix to the draft EIR and will be part of the EIR.

As required by the California Environmental Quality Act (CEQA), the EIR will further examine those issues identified in the initial study as having potentially significant effects or may be topics of significant controversy, identify mitigation measures, analyze whether the proposed mitigation measures would reduce

[6] Re-pointing refers to replacing and sealing failed joints with new mortar.

the environmental effects to less-than-significant levels, and identify feasible alternatives to the proposed project that would reduce those impacts.

The EIR (including the initial study) will be prepared in compliance with CEQA (California Public Resources Code, sections 21000 et seq.), the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The EIR is an informational document for use by governmental agencies and the public to aid in the planning and decision-making process. The EIR will disclose any physical environmental effects of the proposed project and identify possible ways of reducing or avoiding potentially significant impacts.

The EIR will evaluate the environmental impacts of the proposed project resulting from construction and operational activities, and will propose mitigation measures to reduce or avoid impacts determined to be significant. The EIR will also identify potential cumulative impacts that consider impacts of the proposed project in combination with impacts of other past, present, and reasonably foreseeable future projects. The EIR (including the initial study) will address all environmental topics in the department's CEQA environmental checklist; at this time, topics marked with an asterisk (*) are anticipated to be included for full analysis in the EIR:

- Land Use and Planning
- Aesthetics*
- Population and Housing
- Cultural Resources*
- Tribal Cultural Resources
- Transportation and Circulation
- Noise
- Air Quality*
- Greenhouse Gas Emissions
- Wind
- Shadow
- Recreation
- Utilities and Service Systems
- Public Services
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Mineral Resources
- Energy
- Agriculture and Forestry Resources
- Wildfire

Finding

This project may have a significant effect on the environment, and an EIR will be prepared. This determination is based on the criteria of the state CEQA Guidelines, sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance). The purpose of the EIR is to provide information about potential significant physical environmental impacts of the proposed project, and identify possible ways to minimize any significant impacts. The EIR also describes and analyzes possible alternatives to the proposed project. The EIR will also discuss other topics required by CEQA, including significant unavoidable impacts and significant irreversible impacts, and known controversy associated with the project and its environmental effects, and issues to be resolved by decision-makers.

Preparation of an NOP or EIR does not indicate a decision by the City and County of San Francisco to approve or disapprove a proposed project. However, prior to making any such decision, the decision-makers must review and consider the information contained in the EIR.

Public Scoping Comments

The department welcomes your comments concerning potential environmental effects of this project. Written comments will be accepted until **5 p.m. on December 1, 2023**. Written comments should be sent to Jeanie Poling, San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103, or emailed to jeanie.poling@sfgov.org and should reference the project title and case number on the front of this notice.

State Agencies: If you work for a responsible state agency, we need to know the views of your agency regarding the scope and content of the environmental information that are germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in our agency. If you have questions concerning the environmental review of the proposed project, please contact Jeanie Poling at 628-652-7559 or jeanie.poling@sfgov.org.

Members of the public are not required to provide personal identifying information when they communicate with the planning commission or the department. All written or verbal communications, including submitted personal contact information, may be made available to the public for inspection and copying on request, and may appear on the department's website or in other public documents.

Recipients of this notice are encouraged to pass on this information to others who may have an interest in the project.

Dewyani Jain for Lisa Gibson

November 1, 2023

By Lisa Gibson
Environmental Review Officer

Date

cc: Catherine Stefani, District 2 Supervisor



FIGURE 1

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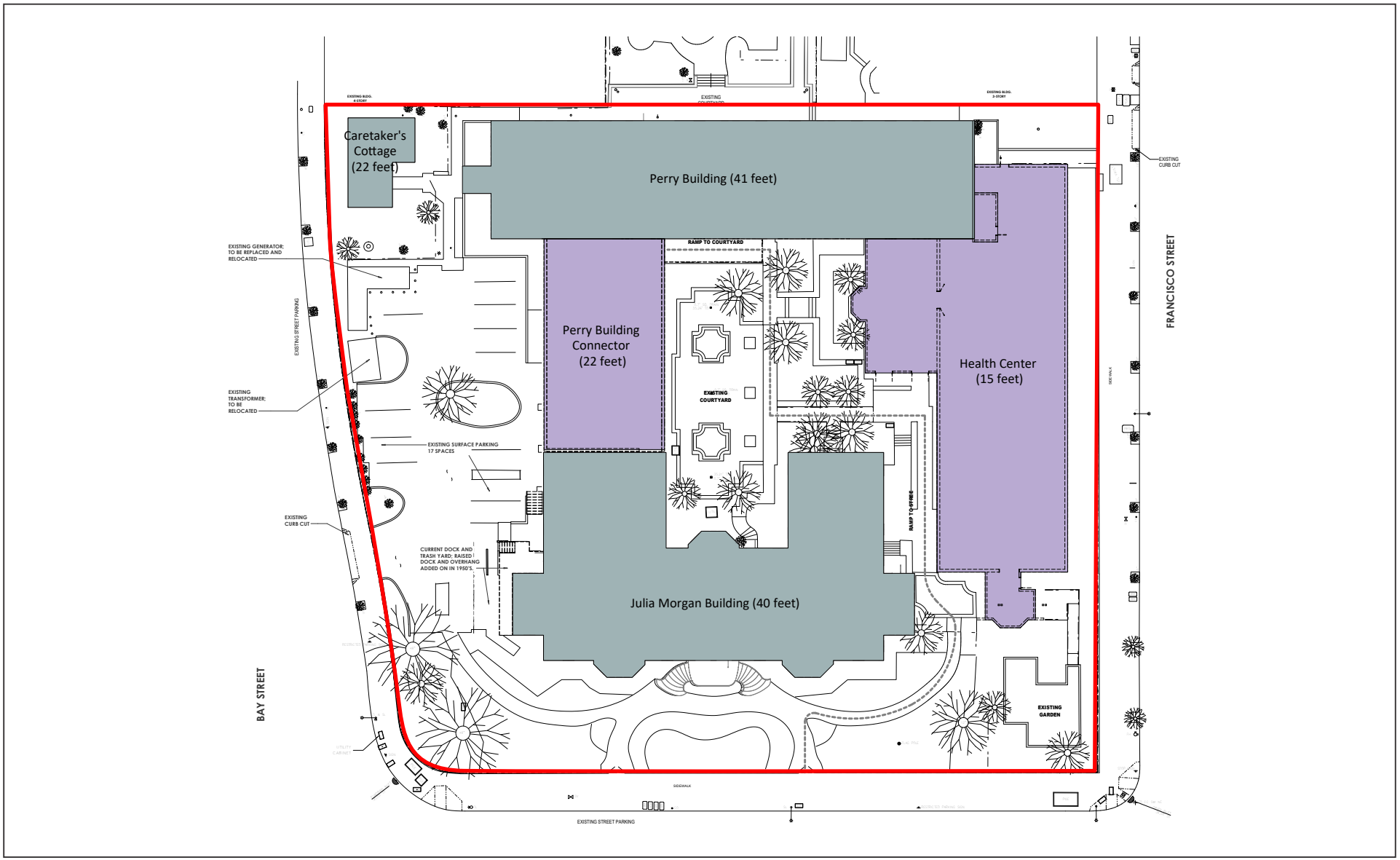
0 1000 2000
FEET

SOURCE: ESRI Street Map, 2023

J:\20230999\G\Project_Location.ai (10/24/2023)

3400 Laguna Street Project

Project Location



LEGEND

- Project Area
- Area of Modified Landscape
- Building to be Demolished
- Building to Remain Interior Renovation Only
- Accessible Path of Travel

FIGURE 2

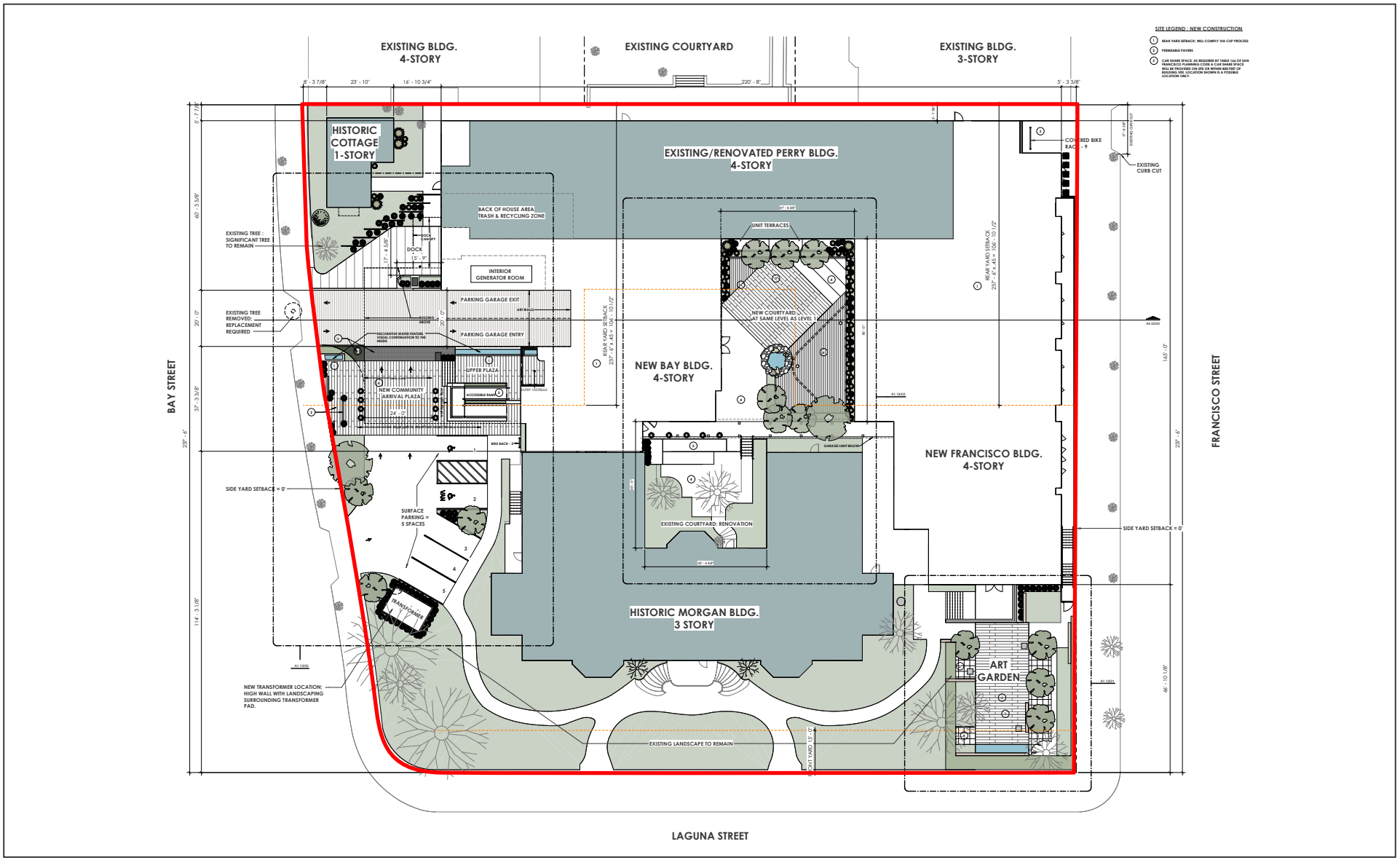
NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Existing Site Plan

J:\20230999\G\Existing_Site_Plan.ai (10/24/2023)



LEGEND

Project Area

FIGURE 3

0 25 50

FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Site Plan

J:\20230999\G\Proposed_Site_Plan.ai (10/26/2023)

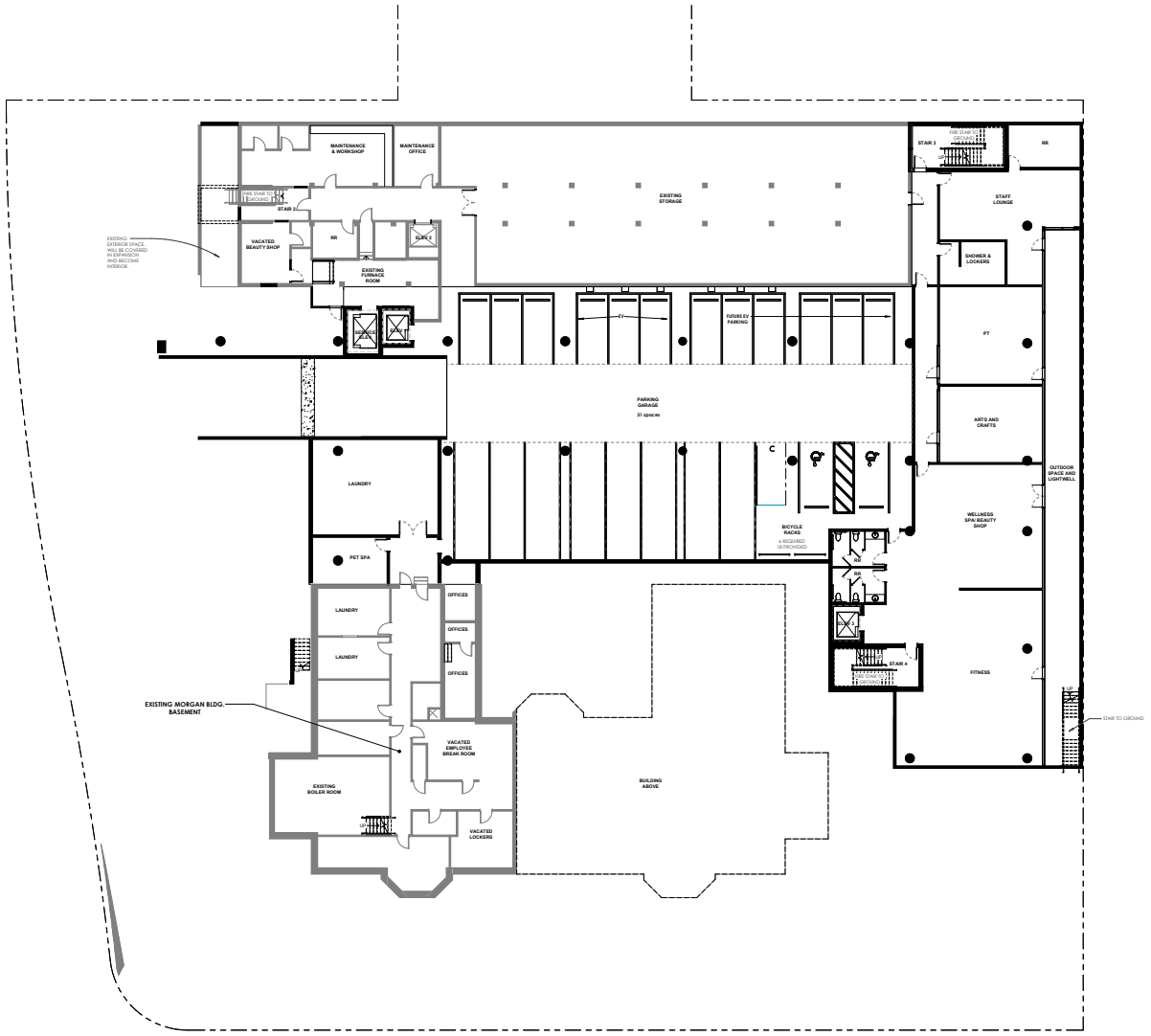


FIGURE 4

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Basement

J:\20230999\G\Proposed_Floor_Plan_Basement.ai (10/26/2023)

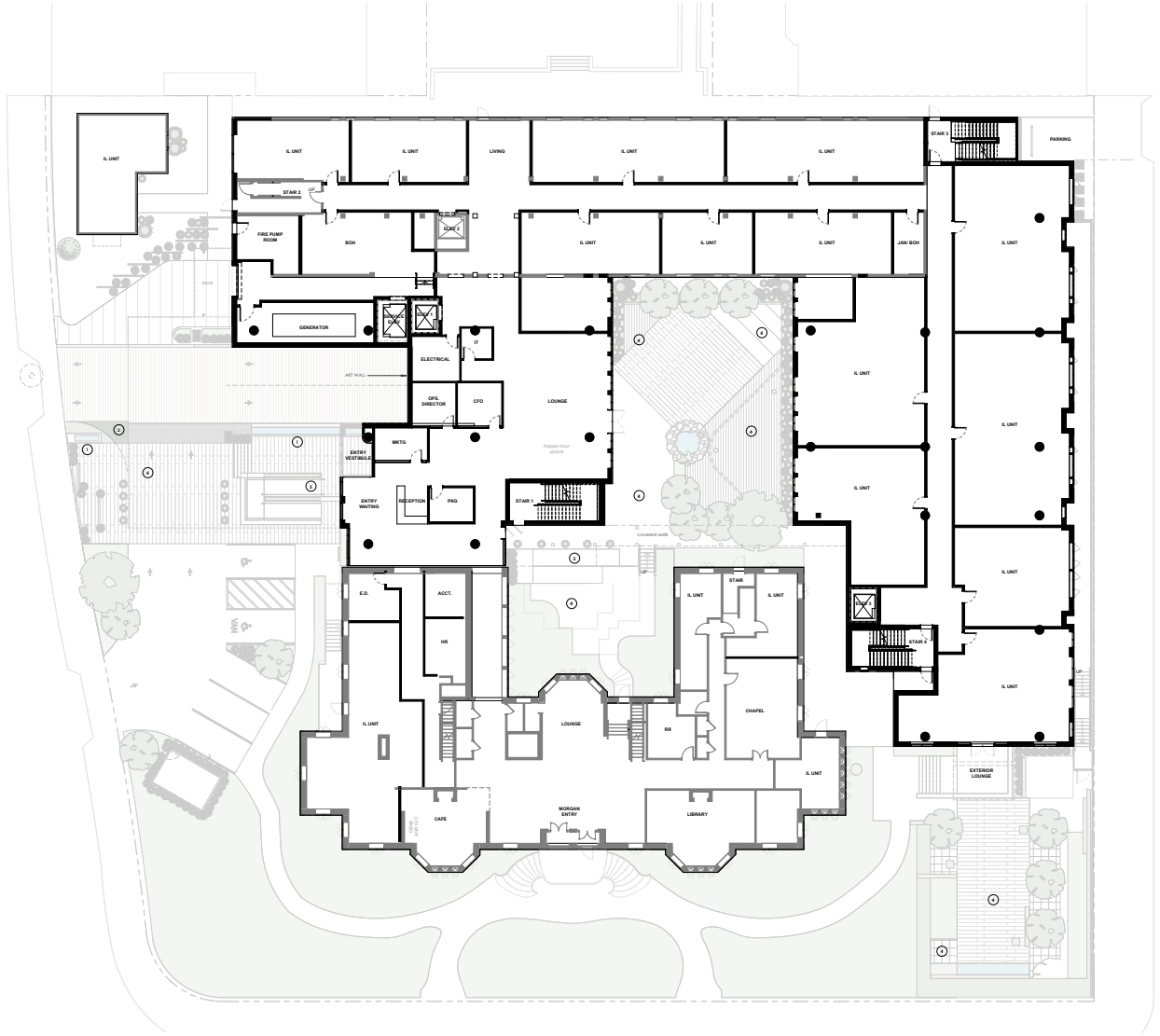


FIGURE 5

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 1

J:\20230999\G\Proposed_Floor_Plan_Level-1.ai (10/26/2023)

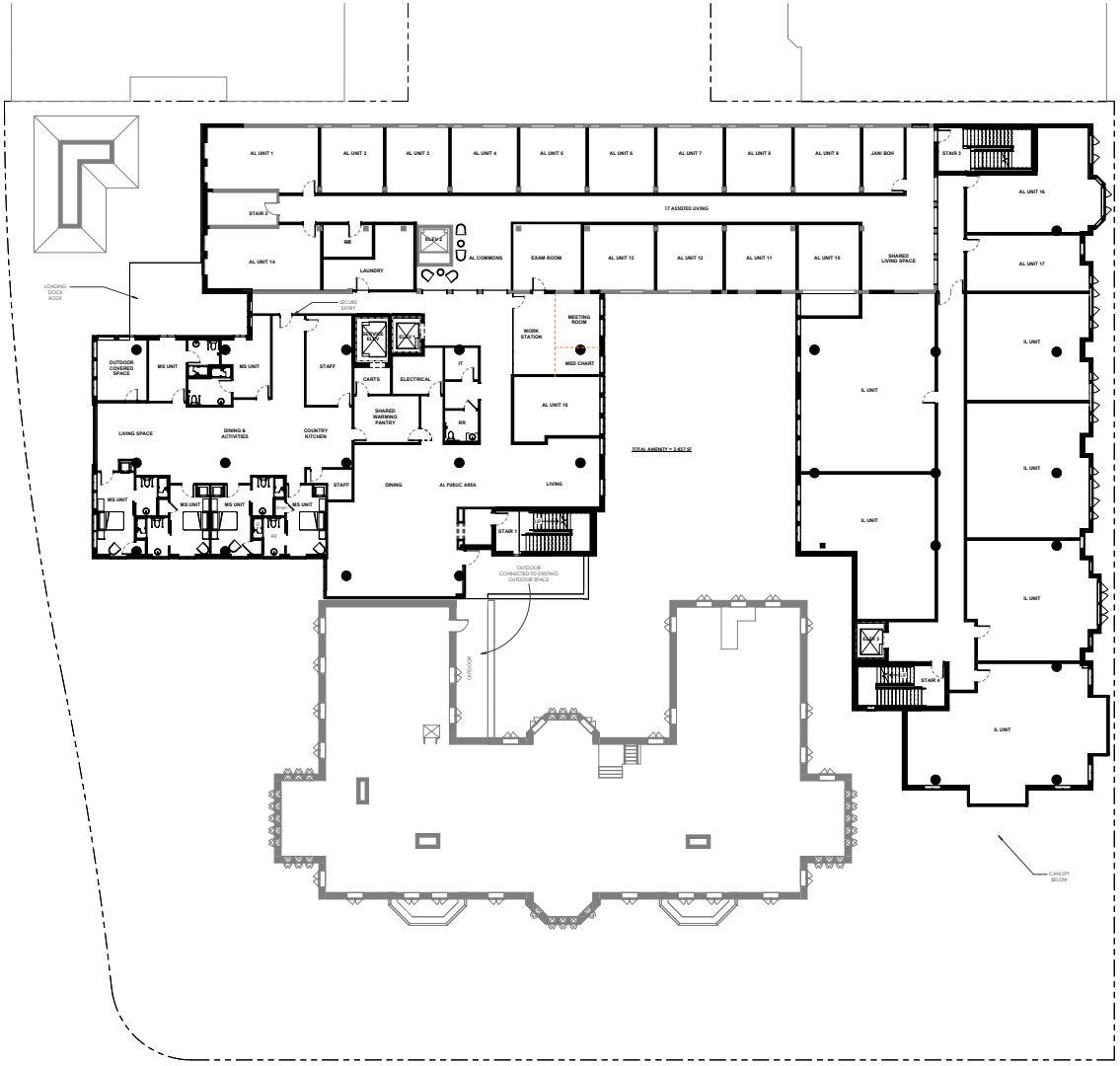


FIGURE 6

NO SCALE

SOURCE: HKS, Inc.

J:\20230999\G\Proposed_Rep_Upper_Floor_Plans_Level2.ai (10/26/2023)

3400 Laguna Street Project

Representative Upper Floor Plan – Level 2

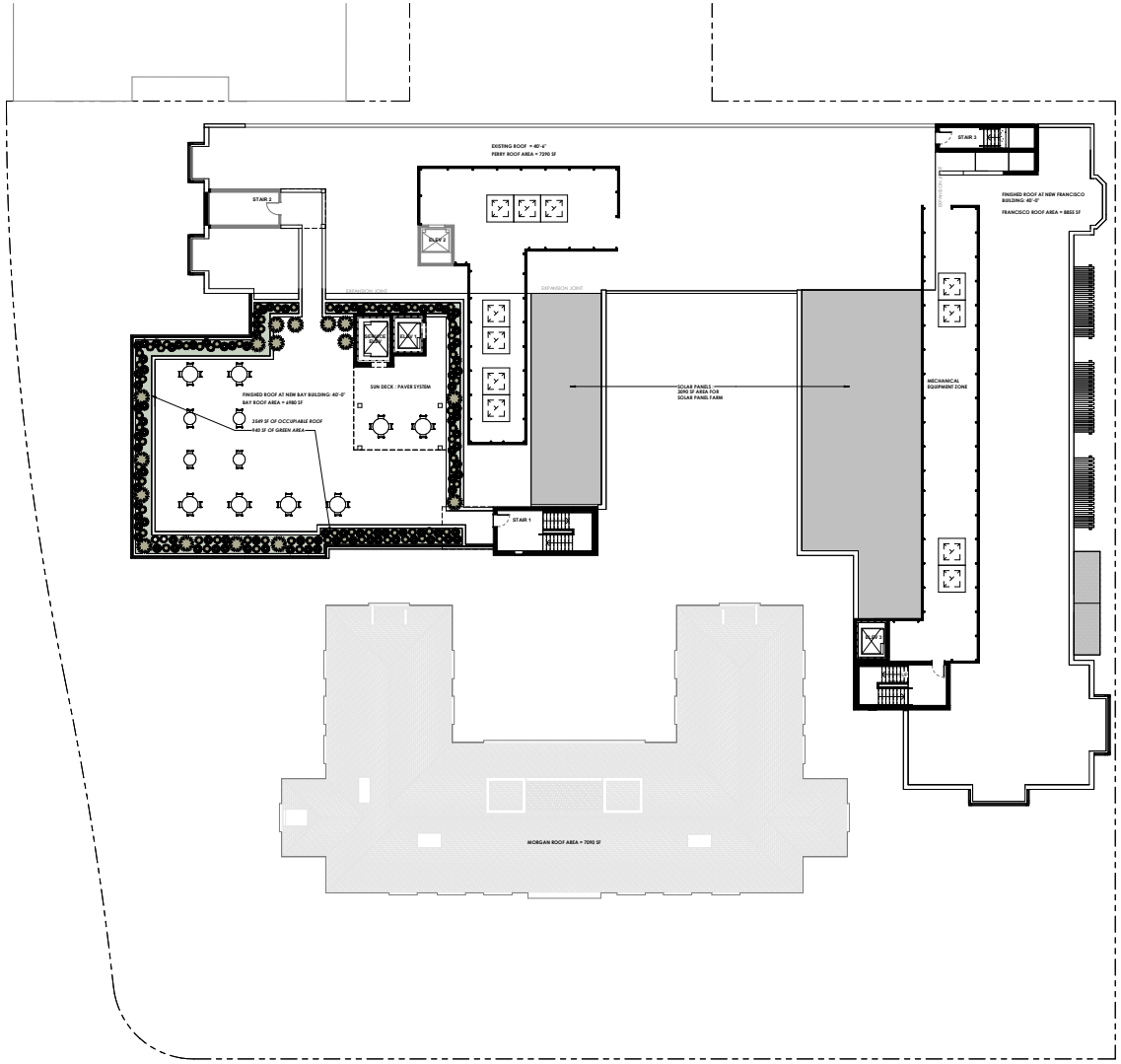


FIGURE 7

NO SCALE

SOURCE: HKS, Inc.

J:\20230999\G\Proposed_Roof_Plan.ai (10/26/2023)

3400 Laguna Street Project

Proposed Roof Level Plan



FIGURE 8

0 15 30
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – North and South

J:\20230999\G\Proposed_Elevations_N-S.ai (10/26/2023)



East Elevation



West Elevation

FIGURE 9

0 17.5 35
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – East and West

J:\20230999\G\Proposed_Elevations_E-W.ai (10/26/2023)

From: Larry Albukerk
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna CEQA notice
Date: Sunday, November 26, 2023 12:53:41 PM
Attachments: 3400 Laguna.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I am writing in response to the CEQA notification due December 1, 2023 about Heritage on the Marina's proposed project at 3400 Laguna Street.

I have lived in San Francisco for 30 years and this corner of San Francisco with access to Moscone Park and Ft. Mason is one of the main reasons I chose to stay in the City and raise my kids here. When my kids were younger I would take them to the playground at Chestnut and Laguna, as they got older we would play on the baseball fields, kick soccer balls and play tennis and basketball across from the Julia Morgan building that is the heart of the Heritage. One of the highlights to me was enjoying the beautiful setting and architecture of the Julia Morgan building along with the complimentary buildings on Francisco street with the iron balconies. I loved the area so much that I eventually bought a home nearby. When my parents, family or friends would visit from out of town they too were in awe of the area surrounded by its crown jewel, the Julia Morgan building, and as a resident of the City this gives me great pride.

Over the years I developed a friendship with the former CEO of the Heritage and he told me they were incredibly lucky because they owned land on Cathedral Hill that was in a dispute and they eventually settled for tens of millions of dollars. This settlement allowed them to accept residents that were good for the community, regardless of ability to pay, he was proud that this was part of his mission as the CEO of a not for profit organization. The Heritage has always been a good neighbor despite being an institution. Now there is a new CEO and the Heritage's focus is all about making money. She claims it is necessary to 'remain in business', which seems crazy because the Heritage has about $100 million of assets, mostly liquid ($80mm of cash, bonds, stocks) and only $9 million of liabilities according to last year's audited financial statement. I have attended two meetings with the Heritage. The first via Zoom with the CEO and her team in September 2022 at which time the Heritage took the position it had the 'right' to build the maximum density without regard to vociferous concerns. The second time in April 2023 at which the Heritage admitted that it does not have any "right to build" but needs the waivers and variances and asked for our feedback. We gave our feedback, and despite offering to follow up, the Heritage has completely ignored the neighbors – I suspect on the advice of its vast team of professional and expensive expeditors, law firms, construction consultants, and other experts.

I mention the prior to give context. My environmental concerns are straight forward.

1. The part of the Marina occupied by the Heritage is zoned residential and the Heritage is

permitted to operate by pre-existing exemption and variances. Granting a variance to build an additional 58,000 square feet will **completely change the scale, scope and character of the neighborhood**. It will truly become Institutional, no longer Residential as it is currently zoned.

2. The new buildings will conceal the Julia Morgan Building both at ground level and higher up because a 4+ story rectangle will not allow any view of the Julia Morgan building where there was previously a view. I suspect this is why the health care center building was only allowed to be one story high. The Perry building was built before the health care center and it was originally to be 3 stories then it was increased to 4 stories, so why would a building built after the Perry building only be 1 story? It seems likely that this was part of a Notice of Special Restriction No. 4506 (NSR) issued to the Heritage.
3. Part of what makes the Julia Morgan building so special is its integration with the gardens and open space. It was part of the architecture. This was a signature of Julia Morgan's designs. The current proposal would severely diminish the green space.
4. I am a big proponent of more housing in this City. However, adding only 23 super luxury units across nearly 60,000 new square feet does not accomplish that goal, especially because those units will only be occupied by one or two residents. Further, these units will not be accessible to everyone - no families, no working people and certainly no affordable housing; in fact, many of the Heritage residents are recruited from outside of San Francisco. If this project were truly residential, the proposed property would easily house over 300 people; as it stands, it will probably be under 100 residents because it is a very high end luxury retirement community with excessive amenities – supported with tax payer dollars as it is a 501c3 (not for profit organization).
5. There will be a massive excavation. I do not see how it is possible to contain the dust from the digging. Considering this is a Air Pollutant Exposure Zone the construction will put the neighborhood, especially children and the elderly, at risk. In particular the elderly that already live at the Heritage. My youngest child is not yet a teenager and I worry for his health both physically and mentally after spending the last 3 years wearing Covid masks. In addition to the dozens of young children living in direct proximity to the project, there are hundreds of kids that visit the 2 playgrounds that are across the street and all of the people that use the fields and courts of Moscone and the thousands of families that enjoy Ft. Mason. Lastly, nearly everyone in the Marina relies on opening windows for fresh air, will this become hazardous? This may be an unmitigated environmental disaster; I hope we do not have to find out.
6. See the attached picture, across the street from 3400 Laguna was a large gas tank with toxic chemicals and other pollutants. There would need to be a massive amount of excavation and testing to convince any reasonable person that the gas tanks didn't pollute the ground in the immediate proximity. Digging up the dirt and having the dust blow onto the parks, houses, playground etc… would be a disaster.
7. With an additional 60,000 square feet, the 2.5+ years of construction will create a nightmare with blocked parking zones for the people that use the parks, the workers and the neighbors. And this will be an ongoing issue post construction with all the extra employees at an institution that will roughly double in size. The parking in the neighborhood is already tight and Heritage workers routinely block neighborhood driveways, I worry that blocking driveways will reach an unsustainable level.

8. Noise pollution at shift changes is currently a problem for the neighborhood. We are constantly woken up by workers during the shift change. People picking up the workers late at night wait in their cars sometimes with music blaring, talking loudly, etc.… We have a similar problem with trash being dumped in front of our homes and cigarette butts on our doorsteps. Doubling the size of the institution will only lead to more trash and more noise.
9. Traffic at Bay and Laguna will be horrendous and that will flow over to the neighborhood on Laguna, Octavia and Francisco streets. Traffic on residential streets creates a dangerous situation for kids and the elderly and there are plenty of both in the immediate neighborhood.

Please also keep in mind that the Heritage is a not for profit entity which means that it is tax payer supported and the HERITAGE DOES **NOT** PAY TAXES. As a local, Federal and California tax payer I am appalled that they are building this project with the end goal to make money. I have no idea why they even have tax exempt status, who are they serving? Extremely wealthy retirees? I am happy to discuss any of my concerns regarding the environmental impact of this proposal in person or by phone.

Regards,
Larry

san fra

FRIENDS
SCHOOL

Tania Albukerk
1547 Francisco St.
San Francisco, CA 94123

Retail

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94103

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Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Avenue
Suite 1400
San Francisco, CA 94103

December 1, 2023

Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Jeanie.poling@sfgov.org

Re:	Comments on Potential Environmental Effects of Demolition of Existing Buildings and Significant New Construction
Case No:	2022-009819ENV
Project Address:	3400 Laguna Street (Heritage on the Marina)
Block/Lot:	0471/003
Zoning:	RM-1 Residential-Mixed, Low Density Use District

Dear Ms. Poling,

Enclosed a copy of the letter that I emailed to you yesterday in response to the Notification of Preparation of an Environmental Impact Report, dated November 1, 2023, with respect to the Case No. and Project Address referenced above.

As I mentioned in my email, I reference several publicly available documents in my letter but did not include copies. I am happy to provide you with links to or hard copies of these materials. You can reach me at talbukerk@gmail.com.

Regards,

Tania Albukerk

November 30, 2023

Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Jeanie.poling@sfgov.org

Jeffrey Horn
Senior Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Jeffrey.horn@sfgov.org

Re:	Comments on Potential Environmental Effects of Demolition of Existing Buildings and Significant New Construction
Case No:	2022-009819ENV
Project Address:	3400 Laguna Street (Heritage on the Marina)
Block/Lot:	0471/003
Zoning:	RM-1 Residential-Mixed, Low Density Use District

Dear Ms. Poling and Mr. Horn,

I am writing in response to the *Notification of Preparation of an Environmental Impact Report* (the "***Notice***"), dated November 1, 2023, with respect to Case Number and Project Address referenced above.

The project sponsor is Heritage on the Marina ("***Heritage***"), which occupies a large parcel of land at 3400 Laguna Street built around a century-old, architecturally significant Julia Morgan designed mansion with a grand entrance on Laguna Street and nestled in a residential Marina neighborhood with beautiful, primarily 2-family homes on its south side (Francisco Street) and east side (Octavia Street), Moscone Field on its west side (Laguna Street) and Fort Mason to its north (Bay Street). Heritage is seeking permission for a massive building project that will bury its historic mansion within nearly 60,000 square feet of new construction comprised of two new 4-story plus buildings and will force up to 4 years of construction on its neighbors and residents.

The environmental effects of this project are so severe that it should not be approved.

The Notice states that only three topics are anticipated to be included for full analysis in the EIR: Aesthetics; Cultural Resources; and Air Quality. I believe that this is much too narrow and strongly urge SF Planning to also include a full analysis of other topics subject to CEQA, including but not limited to: Transportation and Circulation; Noise; Shadow; Recreation; Geology and Soils; Land Use and Planning.

Before discussing the CEQA specific categories, it is necessary to examine why Heritage's proposal should not even be considered because it violates the conditional use authorizations under which it has been allowed to operate. Moreover, the Heritage applied for a new conditional use authorization on February 22, 2023, in which it makes numerous false assertions regarding its project, including but not limited to the environmental impacts and the preservation of historic buildings. Therefore, I am submitting this letter to the SF Planning Assigned Planner for the conditional use authorization as well as the Senior Environmental Planner as issues raised herein with respect to CEQA also apply to the conditional use authorization application.

1. **The Project Violates Heritage's Conditional Use Authorizations**. Heritage, a residential care facility for the elderly, is not allowed under the zoning rules for the East Marina neighborhood in which it is located. Per the Notice, the Project Address is zoned as RM-1, a Residential-Mixed, Low Density Use District. Heritage can operate in this location only because it was grandfathered in when San Francisco rezoned, and all subsequent projects have been subject to conditional use authorizations because of the inherent problems caused by having a large commercial enterprise in a residential location.

   Prior conditional use authorizations have explicitly required that new proposed additions be limited to one-story in height. Specifically, the City Planning Commission Resolution No. 5512, issued April 16, 1962, which authorized the existing one-story Health Center, explicitly states its approval is limited to "providing for a one-story building only." The Health Center is the building that the Heritage is proposing to replace with the 4-story Francisco Building, clearly in violation of the conditional use permit under which the Health Center was permitted. This resolution also references the City Planning Commission approval of Proposal No. Z56.5 in 1956 changing the zoning classification of the Heritage's site from "Second Residential" to "Commercial" so as "to authorize a previous enlargement of the present use, which acquired the status of an authorized conditional use with the reclassification of said property from Commercial to R-4 on May 2, 1960."

   The project proposed by Heritage includes two brand-new four-story buildings, which will have an actual height of over 50 feet when roof-top appurtenances are constructed. Heritage misleads SF Planning when it claims to have five existing buildings. As prior filings by Heritage admit, it has three operating buildings.[1] Page & Turnball, Inc.'s *3400 Laguna Street Historic Resource Evaluation* ("HRE") (issued August 28, 2015[2]) confirm this when it describes the site as "composed of three connected buildings and three landscape areas" (page 2) (note: *also see* page 18 detailing how the buildings are connected). In the Notice, SF Planning repeats Heritage's false claim that the two structures that connect to its existing buildings are "separate" buildings; this is a blatant attempt to appear to be doing fewer changes than it intends.

   Allowing this project would violate the existing conditional use authorizations under which Heritage is allowed to operate. SF Planning should not allow an unscrupulous developer to ignore conditional use restrictions upon which prior construction was permitted because

[1] See *Preliminary Project Assessment Application* submitted by Heritage to SF Planning on September 20, 2022.
[2] Revised and updated February 16, 2023, but without material changes to relevant issues discussed herein.

doing so makes the restrictions meaningless and undermines the integrity of the SF Planning Code and oversight process.

2. **Heritage's Proposal Would Bury a Julia Morgan Masterpiece in a Modern Fortress in Violation of CEQA**. Julia Morgan, a world-renowned California architect, designed the mansion where Heritage is located. The surrounding original landscape of over a half-acre of gardens was designed by John McClaren, the most eminent horticulturist of his era and the designer and superintendent of Golden Gate Park. The mansion, completed in 1925, has been the institution's identity for 98 years. Heritage lies when it claims this project won't alter the mansion; in its SF Planning Preliminary Project Assessment ("PPA") application, it states "*Improvements to the Morgan building facades will be purely restorative...*" Yet, it proposes to completely change the front entrance, currently on Laguna Street, and create a new one on Bay Street. Page & Turnball's HRE includes detailed descriptions of the iconic original entrance on Laguna Street, and in fact, makes clear that the entire western façade of the building is designed around this entrance. (pages 5-8). The Heritage cynically calls this "*repositioning*" their entrance. In what world does abandoning Julia Morgan's design of the entrance to the mansion, fronted by John McClaren's front lawn design, arguably its most iconic feature, to create a brand-new entrance on Bay Street, count as "restorative?" As SF Planning's own documents state, the existing "porch" on Bay Street that Heritage wants to use as its new front entrance was itself an alteration to Julia Morgan's design,[3] and likely wouldn't be allowed today.

   Even more disturbing, the proposal would create a fortress of four-story plus modern buildings on three sides of the mansion (to the south, east and north). These new modern buildings will overwhelm and detract from the Morgan mansion. In fact, the Morgan mansion will become merely a small, subordinate-seeming building. The new buildings will be much taller and larger than the Morgan mansion, will physically shadow it and will obscure nearly all of the Morgan mansion from public view. The flat roofs will look odd and angular next to the sloped gables of the Morgan mansion. The Morgan mansion and its surrounding landscape are important cultural resources, and the proposed project will overpower them and negatively impact their aesthetic. The proposal will cause a substantial adverse change in the significance of a historical resource.

   As the preeminent historical architectural preservation society in San Francisco, SF Heritage (no relation to Heritage on the Marina), noted in its April 4, 2023, letter to Page & Turnball, consultants on this project, *"The new buildings appear out of scale with the Morgan building...The new structures will be connected visually to neighboring masonry and wood structures on Bay and Francisco Streets. The new Bay Building and Francisco Building also appear out of scale with the surrounding neighborhood. The additional 58,000 square feet and height of the proposed structures could have a significant impact on the overall environment, especially on Francisco Street, which includes five small-scale 1920s-era structures."*

   The Notice states the proposed new Bay Building will be 31,300 gross square feet plus 3,549 square feet of rooftop open space and the proposed new Francisco Building will be

[3] See page 6, *San Francisco Planning Department Report for 3400 Laguna*, dated 5/18/2016.

47,100 gross square feet. Together, they will nearly double the existing square footage to 142,000 sf from about 83,000 sf. The entire parcel was designed to showcase the Morgan Building, but it will be both literally and figuratively overshadowed by these new buildings.

Heritage is clearly sidestepping regulations intended to preserve historic structures in order justify constructing new buildings that dwarf the historic mansion and conflict with the surrounding neighborhood. ***Therefore, Heritage's project violates CEQA because it will cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.***

3. **Heritage is making a mockery of the SF Planning Department.** SF Planning's mission is to preserve the "unique heritage" of our city, which it does by enforcing rules and regulations. Decades ago (in 1957), Heritage, relying on conditional use permits, built its large 4-story "Perry Building" at the rear of its parcel (closest to Octavia Street). The Perry Building was only allowed to be built *because* it was at the rear. SF Planning recognizes the Laguna Street entrance as the "primary pedestrian entrance to the site" (*see* Notice). Now, Heritage proposes *changing* the orientation of its lot and moving its front entrance from Laguna Street to Bay Street. Not only does this violate the Morgan mansion's design and aesthetic, but it is a blatant attempt to end-run the SF Planning Department rules. Heritage wants to do this so it can treat Francisco Street as the new "rear" of its lot and therefore rely on much looser rules about construction on land at the back of property lots to build a new building to its property line at the sidewalk with no setbacks. Heritage should not be permitted to arbitrarily change its property orientation to infill its parcel by taking advantage of more lax rules regarding the rear of parcels. ***Allowing the project to proceed would violate CEQA by substantially degrading the existing visual character and quality of the site and its surroundings.***

4. **Heritage Project is "Consuming" the Neighborhood in Violation of Public Policy.** Businesses, like the Heritage, that rely on conditional use authorizations and variances, may not be materially detrimental or injurious to other properties in the neighborhood and must be necessary, desirable, and compatible with the existing neighborhood. The neighborhood consists primarily of typical Marina two-unit buildings and small apartment buildings. Heritage proposes to add nearly 60,000 square feet above-ground. To put this in perspective, this is equivalent to smooshing onto Heritage's one parcel of land the collective square footage of all ten of the buildings located across from Heritage on Francisco Street between Laguna and Octavia Streets. Heritage has also been secretly buying other buildings on its block – in direct contravention of public policy that opposes "institutional creep" (i.e., takeovers of residential areas by businesses). Heritage already owns 20% of the block (3 buildings out of 15) ***not*** including the buildings on its original parcel of land at 3400 Laguna Street; if you add the buildings located at 3400 Laguna to this total, the Heritage owns 40% of the block (the Heritage claims there are 5 buildings at 3400 Laguna so a total of 8 out of 20 buildings). ***Allowing Heritage to build this project violates CEQA because the Heritage is flouting our land use and planning laws and regulations.***

5. **Heritage Project is "Detrimental and Injurious" and Triggers Numerous Issues that are Violative of CEQA.** The detrimental and injurious effects of the proposed project are extensive and unacceptable.

   a. Shadowing. Heritage's property is adjacent to Moscone Field and Fort Mason, two of the most iconic parks in San Francisco with heavily used recreational areas. Heritage's project will substantially shadow both of those sites. Heritage has purposefully evaded providing elevations or full shadow studies (despite PPA requirements to do so) but they did file "preliminary shadow fan" studies with SF Planning. The shadow fans show significant portions of both Moscone Field and Fort Mason as well as most of homes along the south side of Francisco Street as well as some homes on Bay Street to be drastically impacted. The elevator and utility penthouses will exceed 50' feet in height for its two new buildings. The shadows are a direct result of this overreach in height, which is unusually – and inappropriately - tall for the neighborhood. Equally as disturbing, the new buildings will also significantly shadow and block light into the Morgan mansion and the Perry Building. ***CEQA protection against such shadowing and deprivation of light must be enforced.***

   b. Noise. Heritage intends to undertake construction from 7 am to 8 pm and unrealistically states that construction will take 29 months. Common experience makes clear that most construction projects take at least 50% longer than preliminary estimates. This means that Heritage intends to subject its elderly and frail residents as well as its neighbors, many of whom are young children, retirees and people working from home, to the incessant, invasive and unhealthy amounts of noise of construction for at least 55 hours a week for up to four years. This is a quiet, residential neighborhood. ***Therefore, this project violates CEQA as it will "cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project."***

   c. Excavation. The excavation is substantial, with project construction requiring the removal of approximately 15,222 cubic yards of soil to a depth of 15 feet below grade.[4] The surface area of the excavation is over 27,000 square feet, which is equal to 0.62 acres. This excavation is occurring right next to the Morgan building and may potentially undermine its century-old foundation. In addition, the consequences for surrounding properties of such an extensive subterranean disturbance is frightening. As we all know, the soil under the Morgan building and its surrounding Marina neighborhood buildings is a mix of soil and sand and is naturally porous and prone to subsidence. Furthermore, the PPA notes that the Heritage occupies an "archeologically significant area" and, as such, great care must be taken with respect to any sub-surface disturbances of potential tribal cultural resources, among other issues. ***CEQA requires a rigorous review and***

[4] See *Preliminary Environmental Review Checklist* filed by the Heritage with SF Planning. I also note that the Notice states only 9,060 cubic yards of soil would be excavated. I am curious about the source of this substantial difference in estimated excavation given that the size/number of parking spaces for the underground garage is unchanged between these two documents.

mitigation plan to take account for potential excavation-related impacts on ground soil and subsurface areas.

d. Air Quality. The project site is in an Air Pollutant Exposure Zone, in an area with elevated pollutant concentrations, and is subject to Health Code Article 38 ("Article 38"). Heritage is a "sensitive use building," as defined in the applicable section of the Ordinance and must comply with Article 38. An Environmental Evaluation Application should be required for this project because it will generate air pollutants during excavation. Although the site itself is not known or identified as a hazardous waste site, there is a site nearby at 1598 Bay Street from which toxins may have migrated. The project would be a major alteration to a sensitive use location (i.e., retirement home) and therefore substantial mitigations are needed for the excavation site. ***As stated in the Notice, Air Quality is one item that SF Planning agrees needs a full and careful analysis.***

e. Parking and Traffic. The project includes 38 new parking spaces and a new curb. This will add new traffic and parking woes to the neighborhood. Additionally, loading docks on residential streets are also bound to have negative impacts. Equally as offensive, Heritage proposes taking for its private use land that is publicly-owned as it wants to build a private driveway by taking "approximately 15 feet of street parking along Bay Street" and it wants to "add 12 new bicycle parking spaces in the public right-of-way [on Bay Street and Francisco Street]."[5] As a taxpayer, I object to the notion of gifting Heritage any public property. Furthermore, I expect SF Planning to comply with its own rules and regulations. On October 25, 2022, SF Planning issued a Transportation Study Determination Request (TSDR) with respect to this project that violates SF Planning's own requirements by concluding that a "transportation study is not likely required," when actually it is mandatory that two key actions occur: the "Environmental Planner…coordinate with the Current Planner to review the project with the Street Design Advisory Team (SDAT) in accordance with the Better Streets Plan per Planning Code section 138.1" and that the "Urban Design Advisory Team (UDAT) Transportation Planner Liaison…review the project at a UDAT meeting." These actions are mandatory under the terms of the TSDR because the Heritage project meets both the SDAT and UDAT Screening Criteria that trigger such actions.[6]

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[5] See SF Planning, *Public Notice: Notice of Preparation of an Environmental Impact Report*, dated November 1, 2023, for 3400 Laguna Street

[6] SF Planning, Transportation Study Determination Request, prepared by Will Hughen, dated October 25, 2022, pages 3-4, listing all the SDAT Screening Criteria - "on a lot greater than one-half acre; includes more than 50,000 gross square feet (per PC sec. 102) of new construction; contains 150 feet (or more) of lot frontage on one or more public rights-of-way; frontage encompasses the entire block face between the nearest two intersections with any other publicly accessible right-of-way; new construction of 10 or more dwelling units; new construction of 10,000 gross square feet or greater of non-residential space; addition of 20% or more of gross floor area to existing building" - and UDAT Screening Criteria - "development proposes new porte cochere or other type of off-street sidewalk level vehicular driveway, typically used for passenger loading/unloading, between the building and the public right-of-way; development is proposing to retain or alter an existing curb cut, but with increased vehicular activity; development is proposing a new curb cut within 15 feet of another curb cut, greater than 15 feet in width for dual-lane vehicular parking garages, greater than 24 feet in width for dual-lane large truck loading bays, a combined parking/loading curb

Clearly, CEQA concerns regarding transportation and circulation must be addressed, and before they can be addressed, SF Planning must follow its own TSDR guidelines for the required steps with respect to its SDAT and UDAT procedures and meetings.

f. Aesthetics - Loss of Open Space and Landscaping. The Heritage's grounds were carefully designed by McClaren and Morgan with beautiful landscaping and careful siting of the mansion to preserve open space and views for both the residents of Heritage and the surrounding community. This is integral to Morgan's design; you can't separate her mansion from its surroundings. As the National Trust for Historic Preservation said of Morgan, "She designed around a natural landscape, leaving trees in place when possible and letting views help determine building placement…'The brilliance of Julia Morgan is that the buildings feel natural and fitting with the environment,' says Lada Kocherovsky of Page & Turnbull...'She maintained the energy and serene character of the site. The landscape feels untouched'."[7] The Heritage's plans eviscerate the remaining original landscaping and siting and leave nothing but stark modern façades facing the residential block on Francisco and the Fort Mason Park on Bay Street. Beautiful landscaping and open spaces are as much as community resource as a private pleasure. McClaren's original gardens – which extended over a half of an acre – should have been preserved with the same care as San Francisco lavishes on his Golden Gate Park. The very least we can do now is preserve what is left. ***As such, Heritage's plans violate CEQA because it will have a substantial adverse effect on a scenic vista and substantially degrade the existing visual character and quality of the site and its surroundings.***

6. **Heritage is a Super Luxury Residence and Will Not Provide Any Affordable Housing.** Nearly a century ago, the Morgan mansion was built by a non-profit organization, the San Francisco Ladies' Protection and Relief Society (the "***Society***"), as a home "to render protection and assistance to strangers, to sick and dependent Women and Children." Heritage is still run by the Society, but it has abandoned its original non-profit mission by clearly shifting to serving the Bay Area's wealthiest residents. It does not provide any affordable housing. Asked why Heritage was seeking this expansion, its CEO, Mary Linde, said flatly, "To increase our profits." Heritage is already the most expensive assisted living facility in San Francisco - and likely the wealthiest with nearly $100 million in assets, including over $80 million in cash, bonds and marketable securities[8] - and yet it is greedy for more. If anything, Heritage is making San Francisco housing less affordable for seniors. Instead of helping to increase housing options in San Francisco, Heritage has been quietly combining existing studio units into 1- and 2-bedroom suites to raise prices; it has taken

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cut greater than 27 feet, or a total of more than 30 feet of curb cuts (multiple driveways)" - triggered by Heritage's project.

[7] "Ahead of Her Time: California Icon Julia Morgan," by Meghan Drueding, Preservation Magazine, Summer 2015. https://savingplaces.org/stories/ahead-of-her-time-julia-morgan

[8] 2021 Form 990PF, filed by San Francisco Ladies' Protection and Relief Society. https://projects.propublica.org/nonprofits/organizations/941156611/202203219349100510/full

out dozens of permits in recent years to remodel, reconfigure and mostly merge its units, creating ever larger and more luxurious "suites." Currently, a one-bedroom requires an upfront payment of at least $550,000 plus $8,000/month! The resident does not own anything, the upfront payment is kept by the Heritage and upon the passing (or moving out) of the resident, Heritage takes a new upfront payment from the next resident at a higher price. Now, Heritage is asking for this huge expansion to build even larger, fancier and more expensive housing. Its' plan would create 23 new units over its nearly 60,000 square feet in new construction, which is equivalent to 2,600 square foot units for one or two people. Make no mistake – this is about profits and not people. ***As such, the Heritage project is not consistent with CEQA requirements – or generally City of San Francisco building priorities – with respect to land use and planning.***

The project is inconsistent with the Morgan mansion's history, its surrounding and its zoning as well as the Society's mission. It will dwarf everything around it. It is too big, too monolithic and demonstrates complete disregard for its neighbors and neighborhood. SF Planning must reject Heritage's project as it violates its conditional use permits and authorization and would turn the East Marina residential neighborhood into something that looks like an outpost of the UCSF Mission Bay health care industrial complex.

This is truly a David versus Goliath situation, and we need SF Planning to speak for and protect the small property owners in the neighborhood. Heritage has already spent many millions of dollars and several years secretly planning this project and its payroll seemingly includes every big-name construction-related firm operating in the Bay Area, including Charles Pankow Builders Ltd., Page & Turnbull, Inc., Rockwood Pacific, Inc., GBA Inc., Gates+Associates, Kimley-Horn and Associates, Inc., HKS, Inc. and Perkins Coie LLP. The Heritage is so wealthy that it can easily afford all these expensive service providers. Unlike the Heritage, homeowners who will be most impacted – physically, economically and emotionally – by this construction do not have bottomless bank accounts to draw from and many have a significant part of their net worth or retirement savings tied up in our homes. Allowing the Heritage to build as it desires will result in robbing hard-working tax-paying San Franciscans of millions of dollars of home equity and shifting it directly to the Heritage, which is not only enormously rich but also, as a not-for-profit, does not pay any federal, state or local taxes, takes every advantage and gives back nothing.

Heritage's project is fatally flawed with numerous aspects that violate CEQA and SF Planning rules and regulations. I respectfully request that SF Planning demonstrate its independence from the grip of these repeat players in how it evaluates and responds to Heritage's massive, inappropriate and detrimental project request, and deny Heritage's application for a permit.

Sincerely,
Tania Albukerk

From: Eli Baker
To: Poling, Jeanie (CPC)
Subject: EIR impact 3400 Laguna Street
Date: Thursday, November 30, 2023 5:43:47 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I am writing in regards to the Environmental Review notice for 3400 Laguna Street. Please find my concerns for environmental impact and CEQA below:

The sponsor has estimated this as a project that will last at least 6 years, this alone is a huge imposition on the environment, residential neighborhood, national and local parks directly adject to the project and the residents of the property.

1. Airborne concerns: This project has several demolition, excavation, and build components. Each phase presents airborne concerns of not only dust and debris, but airborne toxins such as asbestos, heavy metals/lead, concrete, and glass. This would impact the neighbors, children in the park/playground and the elderly residents.
2. Ground stability concerns: much of the Marina neighborhood is built on former landfill and at high risk for soil liquefaction. The liquefaction zone begins within 1.5 blocks of the project. Demolition and more importantly excavation and below grade construction could be destabilizing to the surrounding areas including neighborhood homes, apartment buildings, and lighting structures at Moscone Park. An added risk to an area already at seismic activity risk.
3. Noise pollution concerns: As noted above, this project is slated for a minimum of 6 years. The noise pollution for an extensive building among much smaller homes (141,579 sq ft vs. multi family neighborhood buildings of ~ 6500 sq ft) for such an extended duration could cause health problems not limited to anxiety, headaches, and hearing loss.
4. Traffic and parking concerns: Traffic patterns and loss of parking during this project present a concern in an already busy traffic and congested parking area. Bay Street is a very busy 4 lane through street. Laguna Street is busy with both vehicle and pedestrian traffic (requiring 4 crosswalks with flashing lights) and includes an active bus route. Francisco Street neighbors will be impacted with restricted access to garage and street use as large demolition and construction vehicles utilize the street. The parks add to the congestion as softball games, tennis, basketball and other recreational uses add dozens of people in the afternoon and evening hours during the week and hundreds of people congregate at Ft. Mason during the weekends, and sometimes thousands during the many special events.

Thank you for listening to the public and considering the impact of this massive project in a residential neighborhood.

Marina Neighbor,

Eli Baker

1435 Bay Street Homeowners Association
1435 Bay Street
San Francisco, CA 94123

27 November 2023

Jeanie Poling, Senior Environmental Planner
San Francisco Planning Department
49 South Van Ness Ave., Suite 1400
San Francisco, CA 94103

RE: 3400 Laguna Street (Case 2022-009819ENV)

Ms. Poling:

Our group represents the residents of 1435 Bay Street, immediately to the east of the proposed project at 3400 Laguna Street. Upon review of the design documents, we believe that the proposed project will have substantial impacts on the environment which must be considered in the preparation of the pending Environmental Impact Report.

Specifically, we believe the proposed project has the following impacts:

1. Aesthetics and Recreation:

   A. Aesthetics
      - The proposed project will have a substantial adverse effect on a scenic vista.
      - The proposed project will substantially degrade the existing visual character or quality of the site and its surroundings.
      - The proposed project may create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

   B. Recreation
      - The proposed project will negatively impact recreational facilities, which may have an adverse physical effect on the environment.

   The massing of the new building along Laguna Street creates a significant impact to that street, reducing the public's view as they approach Moscone Park from the east. The decreased massing of the current Heritage Facilities (stepping down in density along Francisco Street as it meets Laguna Street) provides an important transition from the dense built environment along Laguna Street toward Moscone Park. This decrease in density provides a transition between the built environment to the open public park.

   The new building element above the Community Entry Plaza significantly impacts an existing public view corridor from Moscone Park to the northeast toward Fort Mason. Both heavily used public parklands provide substantial relief for the public in the second most densely populated city in the United States.

   One of the new buildings creates new massing along Bay Street, which creates a prominent covered Porte Cochere at the new Community Entry Plaza. This new element creates new massing and uses out of character for the neighborhood. The covered Porte Cochere is a hotel-scaled element wholly out of character with the residential neighborhood. No building north of Lombard Street and west of Van Ness Avenue has anything like this commercial-scaled vehicular drop-off element.

The light required for the new main entry, new parking garage entry, and expanded loading dock will create new sources of light and glare.

2. Biological Resources:

- The proposed project may have a substantial adverse effect on a sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.
- The proposed project may conflict with local policies or ordinances protecting biological resources, such as tree preservation policies or ordinances.

The proposed project includes removal of mature trees, which currently provide a buffer between the built environment and the Fort Mason parkland, and may host sensitive natural communities or habitat.

3. Greenhouse Gas Emissions, Hazards & Hazardous Materials, and Air Quality:

A. Greenhouse Gas Emissions
- The proposed project may generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

B. Hazards & Hazardous Materials
- The proposed project may 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.
- The proposed project may emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing school.

C. Air Quality
- The proposed project may violate air quality standards or contribute substantially to an existing or projected air quality violation.
- The proposed project may create objectionable odors affecting a substantial number of people.

The project includes the addition of an emergency power generator and loading dock adjacent to the residential building at 1435 Bay Street. The generator will produce petrochemical exhaust when in use, which may be frequent, as the facility is a 24-hour healthcare provider. In addition, Marina Middle School is 0.2 miles to the west, less than one-quarter of a mile away.

4. Transportation/Traffic

- The proposed project conflicts with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, pedestrian and bicycle paths, and mass transit.
- The proposed project may conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.
- The proposed project will substantially increase hazards due to a design feature (main entry drive too close to a very busy signaled intersection).

The proposed project includes a new commercial drop-off and loading dock along Bay Street. The City of San Francisco prohibits commercial vehicles weighing more than 3 tons from operating on Bay Street

between Laguna Street and Franklin Street. (see attachment). This ordinance effectively prohibits any vehicle heavier than a passenger car or light truck from driving on Bay Street. The same restriction exists on Francisco Street between Laguna and Franklin (more information can be found at www.sfmta.com/commercial-vehicles). Consequently, the proposed Community Entry Plaza cannot be accessed from Bay Street, and therefore is not possible.

In addition, the proposed project includes the addition of a second curb cut along Bay Street. Bay Street is a significant thoroughfare, with heavy traffic particularly during commute hours, as it is a major route for traffic coming from and going to the Golden Gate Bridge. The existing curb cut closer to Laguna Street, now used infrequently for surface parking, would be used as the primary vehicular entry to the Heritage property. This increased traffic will be entering the new vehicular entry very close to the corner of Laguna Street, causing a congested traffic situation near an extremely busy signaled intersection at the corner of Laguna and Bay.

The new underground parking garage, loading dock, and Community Entry Plaza will significantly increase traffic, creating a substantial impact. The intersection of Bay and Laguna streets includes a Muni bus line, major east-west dedicated bicycle route, and busy pedestrian pathways. Adding this traffic activity to an often very congested Bay Street (with no new left turn lanes from the westbound lanes of Bay Street) will exacerbate already challenging conditions.

5. Cultural Resources:
   - The proposed project will cause a substantial adverse change in the significance of a historical resource.

   The new additions behind the Julia Morgan Building along Bay and Francisco Streets create a monolithic, rectangular mass which is detrimental to the current public views of the landmarked Julia Morgan Building. The current building, as viewed from Moscone Park, is visually isolated, enhancing its contribution as a historic resource, especially as viewed by the public. There are few (if any) historical resources in San Francisco which can be so clearly viewed by the public from a park in San Francisco.

6. Noise
   - The proposed project may cause exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
   - The proposed project may cause exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
   - The proposed project will cause a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
   - The proposed project will cause a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

   The project significantly increases noise along Bay Street, due to increased traffic (drop off at Community Plaza and new underground parking garage), the addition of a new loading dock immediately adjacent to 1435 Bay Street, and noise generated by the new generator.

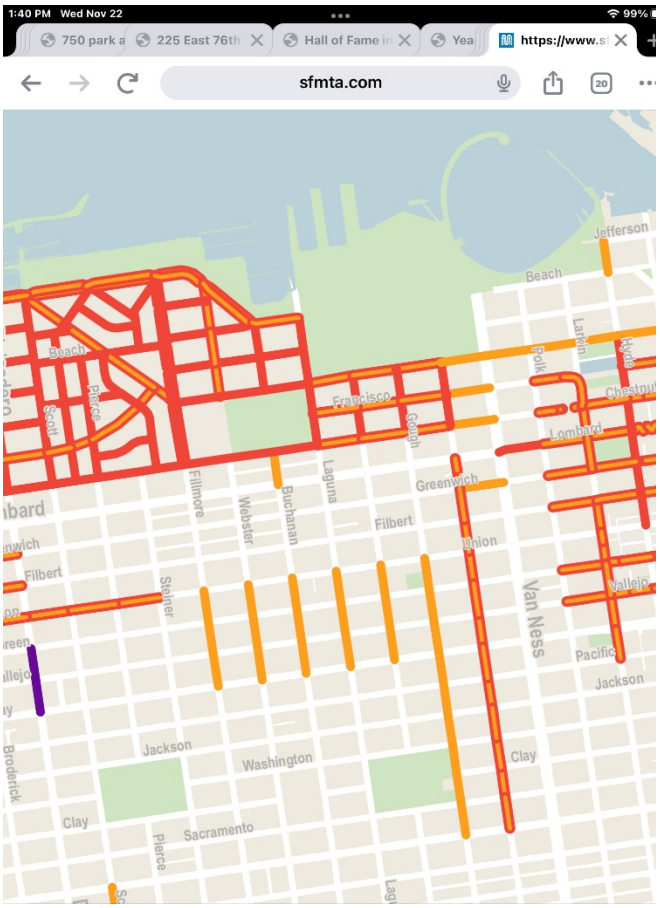
We believe the above issues are significant, and will create substantial negative environmental impacts to the neighborhood, traffic, and the public (including users of two heavily used adjacent public parklands); and may have additional noise, air quality, hazardous materials, air quality impacts, and impacts to habitat.

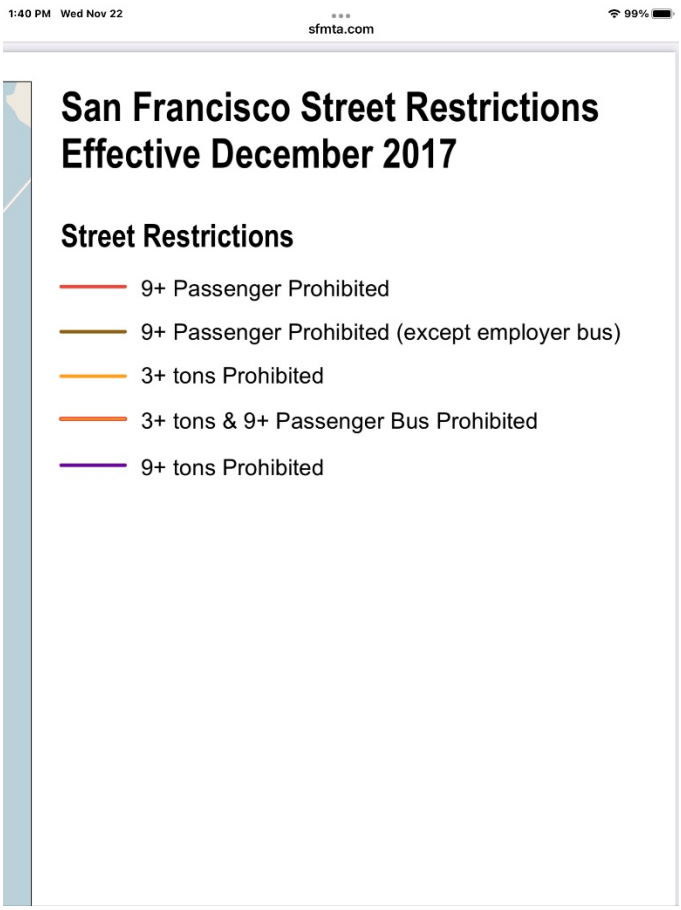
Best Regards,

Residents of 1435 Bay Street

City of San Francisco Commercial Vehicle Restrictions

www.sfmta.com/commercial-vehicles





From: Sarah Baker
To: Poling, Jeanie (CPC)
Cc: Stefani, Catherine (BOS); Horn, Jeffrey (CPC); tlpeckham@comcast.net; Bart Draper
Subject: Heritage Expansion Project
Date: Wednesday, November 29, 2023 3:43:00 PM

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Case No. 2022-0009819ENV; 3400 Laguna Street

Dear Ms. Poling,

I am writing to express my concerns about the potential environmental impacts of the Heritage on the Marina's project at 3400 Laguna Street. I understand that San Francisco Planning is currently accepting comments on the proposed scope of a CEQA environmental impact report, but I want urge the Department to also engage with the San Francisco Department of Public Health to ensure that Public Health in engaged in enforcement the Maher Ordinance with respect to this project.

This site appears on the Maher Map and is subject to the Ordinance. As the historic maps included in the Page & Turnbull Report[1] illustrate, this entire site was probably filled former bay or a marsh and creek area. The excavation for underground parking is proposed at some 15' feet in depth and will cover a wide area.

Based on these considerations, the San Francisco Planning Department should refer this project to San Francisco Department of Public Health for further consideration under the Maher Ordinance. This will ensure a more complete evaluation of the potential environmental impacts of this large and unnecessary development in predominately residential and recreational area.

Regards,
Sarah Baker

[1] Figures 51 and 52 (pages 36 and 37) in 3400 Laguna Street Historic Resource Evaluation, Part 1, San Francisco CA; Prepared for the San Francisco Planning Department by Page & Turnbull,; February 16, 2023

December 22, 2023

Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Jeanie.poling@sfgov.org

Jeffrey Horn
Senior Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Jeffrey.horn@sfgov.org

Re: Comments on 3400 Laguna Street (Heritage on the Marina) Proposal for Massive Building Project

Dear Ms. Poling and Mr. Horn,

I am writing in response to the *Notification of Preparation of an Environmental Impact Report* (the "***Notice***"), dated November 1, 2023, with respect to Case Number 2022-009819ENV.

I understand the deadline to respond to the Notice was December 1, 2023. However, I have lived 200 feet from the project sponsor, Heritage on the Marina ("***Heritage***"), located at 3400 Laguna Street, for over 30 years and I never received a copy of the Notice. I have spoken to most of the residents of my building, at 1500 Francisco Street, which has and no one seems to have received this Notice. Given the lack of notice, I am hoping that you will consider my letter as part of your review and take into account my strong opposition to the Heritage's proposed project.

I only became aware of the Heritage's desire to build two towers consisting of nearly 60,000 additional square feet on its property by chance when a neighbor in lives down the street mentioned it. I am a retired widow. My home is my sanctuary. It is not fair that my peace and enjoyment of my home should be shattered by the Heritage's greed, which is indeed what will happen if this massive project is approved. The noise, construction traffic and pollution will be my constant companion for a minimum of 30 months (according to the Notice) but likely longer given that almost all large construction projects take longer than estimated. I am worried about the impact on my health and wellbeing, especially from the noise, dust and potential release of toxins into the air from the excavation that the project would entail.

When my late husband and I bought our home, the location almost adjoining the Heritage's beautiful central building, a historic mansion designed by the renowned architect, Julia Morgan, was a selling point, as well as the "breathing room" that its lawns, trees and open space provides on our block. The Heritage's plans would result in the mansion nearly disappearing from public

view as it will be enclosed on three sides by buildings that are 40 feet or higher, and much of the existing setbacks and landscaping will be destroyed to make space for these new towers.

I am also aware that the Heritage has been buying up several buildings on my block and "folding them" into its operations. On the north side of Francisco between Laguna and Octavia, there use to be four multi-family buildings, and this added to the sense of community on our block. Now, the Heritage took over two of those buildings and seem to constantly be moving people in and out. They also own at least one building around the corner from me on Octavia Street. I wonder if their plan is to try to buy up our entire block? They don't seem to care about the massive housing shortage in San Francisco and, instead, are adding to it.

Please do not let the Heritage do this project. Their greedy plans come at my expense and that isn't fair or just.

Sincerely,

Masae Matsumoto Beresford



Masae Beresford
Apt 10
1500 Francisco St
San Francisco, CA 94123

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Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

941038798 C003

Jeanie Poling
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94108
jeanie.poling@sfgov.org

November 27, 2023

Re: Case No. 2022-009819ENV
Project Address: 3400 Laguna Street

Dear Ms. Poling,

I am reaching out to discuss the Environmental Review notice concerning the development at 3400 Laguna Street by the Heritage at the Marina (the "Heritage"). Below, I have outlined my apprehensions regarding its environmental impact and specifically the issues protected by the California Environmental Quality Act (CEQA).

First, I am concerned about the irreparable harm:

Ground Stability Apprehension. Given that a significant portion of the Marina neighborhood rests on former landfill, the risk of soil liquefaction is notably high. The liquefaction zone initiates within 1.5 blocks of the project site, raising concerns about potential destabilization affecting nearby residences, apartment buildings, and the structures at Moscone Park. The depth and extent of the large excavation proposed by the Heritage only increases my concerns. This unnecessary project adds an extra layer of risk to an area already susceptible to seismic activity.

Air Quality Concerns. The various phases of this project, encompassing demolition, excavation, and construction, pose airborne challenges involving dust, debris, and potential toxins like asbestos, heavy metals/lead, concrete, and glass. The health risks posed by allowing the Heritage to proceed with a construction project of the size and scope it is seeking are not justified. Surrounding the Heritage are two public parks (Moscone Field and Fort Mason) used by hundreds of people a day, as well as homes full of families with young children, not to mention the elderly and often health-compromised residents of the Heritage itself. None of us deserve to be exposed to the risks of this project to our health and well-being.

Diminishment of a Cultural Heritage. At the heart of the Heritage is an iconic Julia Morgan mansion. I was surprised to learn that it has not already received landmark status either federally or from the State of California as I am sure it deserves protection. The proposed construction of nearly 60,000 square feet consisting of two modern four-story plus building will harm this architectural gem. No one will be able to see any part of the mansion except the front façade on Laguna Street. And it isn't just the mansion that deserves protection. Ms. Morgan was careful and precise about how she sited the building and designed the surrounding landscape. All her remaining original work should be preserved. I also understand that Heritage wants to drastically alter the mansion by creating a brand-new front entrance on the side of the mansion facing Bay Street. I especially hope that you will prevent this from happening. The Heritage wants to do this

so it can treat Francisco Street as the "rear" part of its lot and put a new building all the way to its property line. The historical record is very clear that the rear of the Heritage's lot faces Octavia Street. It is only because it was at the rear that the Perry Building was allowed to be built in 1957. To allow the Heritage to keep changing its orientation in order to max out construction on its lot is to undermine the entire concept underpinning the planning code.

Moreover, the construction itself will cause significant harm:

Noise Pollution Considerations. Heritage's approach to this project feels dismissive of the impact on the community. They want free reign to do construction for 11 hours a day for at least 5 days a week for years (at a minimum for 2 ½ years but realistically given normal delays in building more likely to be up to 4 years). The noise generated by the construction of an extensive building amidst comparatively smaller residences (141,579 sq ft vs. neighborhood homes of ~6500 sq ft) could lead to health issues, including anxiety, headaches, and hearing loss, in addition to the significant disruption of the peaceful enjoyment of their homes by surrounding neighbors and by all San Franciscans of the use of our shared parks and playgrounds that surround the Heritage.

Traffic and Parking Challenges. The altered traffic patterns and diminished parking availability during the project pose concerns in an already bustling and congested area. Bay Street, a heavily trafficked 4-lane thoroughfare, and Laguna Street, teeming with both vehicular and pedestrian traffic, including four crosswalks with flashing lights, face disruptions. Residents on Francisco Street will encounter restricted access to their garages and streets as the substantial construction and demolition vehicles navigate the area.

I appreciate your consideration of both my concerns and those of the wider public. I eagerly await the outcomes of the San Francisco Planning Department's comprehensive review.

Yours sincerely,

Christy Chandler

From: Bart Draper
To: Poling, Jeanie (CPC)
Cc: Stefani, Catherine (BOS); Horn, Jeffrey (CPC); Terry Peckham
Subject: EIR Scope Case No. 2022-0009819ENV; 3400 Laguna Street
Date: Tuesday, November 28, 2023 7:07:20 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Case No. 2022-0009819ENV; 3400 Laguna Street

Dear Ms. Poling,

I am writing to express my concerns about the scope of the environmental impact report San Francisco Planning is proposing for the Heritage on the Marina's project at 3400 Laguna Street. The phase 1 environmental assessment conducted by Cornerstone Earth Group on behalf of Heritage on the Marina raises a number of environmental issues that require additional evaluation. These include:

<!--[if !supportLists]-->• <!--[endif]-->The presence of hazardous volatile organic compounds in groundwater adjacent to and perhaps underlying the property;
<!--[if !supportLists]-->• <!--[endif]-->The property's proximity to former underground storage tanks locations that are known to have leaked;
<!--[if !supportLists]-->• <!--[endif]-->The potential presence of buried structures, contaminated fill and/or debris that may be encountered during excavation of the proposed subsurface garage;
<!--[if !supportLists]-->• <!--[endif]-->Asbestos-containing building materials and lead-based paint that may be aerosolized and dispersed during demolition activities; and
<!--[if !supportLists]-->• <!--[endif]-->Current on property storage of fuel, hazardous chemicals and hydraulic fluids.

While not specifically described in the Cornerstone Earth Group report, the northeast corner of the property is adjacent to one of the locations of PG&E's former North Beach manufactured gas plant (MGP). Limited sampling results[1] indicate that some subsurface soils from approximately 3 to 6 ft bgs, and in some areas down to 10 ft bgs, contain MGP residues. The MGP residues observed appeared black or dark gray in color, solid, dry, and immobile. Chemicals of potential concern which are associated with MGP residues include:

<!--[if !supportLists]-->• <!--[endif]-->Benzene, toluene, ethylbenzene and xylenes;

<!--[if !supportLists]-->• <!--[endif]-->Polynuclear aromatic hydrocarbons; and

<!--[if !supportLists]-->• <!--[endif]-->Cyanide.

Based on these and other potentially not yet discovered adverse environmental conditions, the San Francisco Planning Department should, at a minimum, require the project proponents to include

hydrology and water quality and hazards and hazardous materials as topics for full analysis in the environmental impact report. This will ensure a more complete evaluation of the potential environmental impacts of this large and unnecessary development adjacent to a formerly used industrial area.

Regards,

Bart Draper, Ph.D.

[1] Remedial Action Plant, Former North Beach and Fillmore Manufactured Gas Plant Site, San Francisco, CA; by Haley & Aldrich, Inc. Walnut Creek, California; for Pacific Gas and Electric Company San Ramon, California; File No. 36970-007; May 2012

Cc: Catherine Stefanie (Catherine.Stefani@sfgov.org); Jeff Horn (Jeffrey.horn@sfgov.org)

From: David Dunford
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna
Date: Sunday, November 26, 2023 7:01:28 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I am very concerned about the negative impact on the neighborhood, playground, parks and in particular the Julia Morgan Treasure and sheer amount of pollution the project at 3400 Laguna will generate. I take my young children to Moscone Park and Ft. Mason on a regular basis and consider this area an essential resource of San Francisco.

Building massive rectangular buildings right next to the Julia Morgan building is completely out of context. It will visually impair the building. The square angles of the new buildings will consume the sloped roof and texture of the Julia Morgan building. It will cast shadows across it so the public will only be able to enjoy it with natural sunlight a few hours per day, if they can see it at all. In fact, the shadows of the new buildings will likely also shadow Moscone Park across the street. It also looks like the construction will remove the corner gardens and greenery along the southern border. And most importantly it will eliminate many of the current views of the Julia Morgan building. Please do not allow the proposed construction to render this rare, beautiful example of perhaps the most important woman architect, impotent.

Obviously we are also concerned about the environmental impact of our health as well 1. destruction of existing buildings as they were built at a time when there were horrible chemicals, asbestos etc.. I'm worried the airborne pollutants will infect the entire neighborhood, 2. Construction - pollution of machines and trucks, traffic, trash, noise, excavation debris, unsettling of the ground… for 3+ years! 3. Completion - The unnecessary carbon footprint of almost 60,000 extra square feet for very few additional residential units. Increased traffic from larger campus (vendors, employees…), less public parking for park users, increased noise, more garbage, inviting setting for non-homed people to set up tents (particularly along Francisco where it will be the back of the Heritage and just a wall and sidewalk for the better part of a block).

Preserving the integrity of the historic Julia Morgan building and replacing the old 1 story building with a new 1 story building (keeping existing landscaping or adding) and improving existing buildings, would be a much better plan and fit better in this residential neighborhood with parks.

Thank you for your consideration,

David

From: Todd Eichler
To: Poling, Jeanie (CPC)
Subject: CEQA 3400 Laguna Street
Date: Monday, November 27, 2023 8:49:28 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Ms. Poling,

In response to the CEQA Notice sent November 1, 2023 please consider the impact the 3400 Laguna project will have on the Julia Morgan building. This is the best example of her work in San Francisco. Building monolithic buildings on 3 sides (1 existing) will hide it from the neighborhood and the parks. I also fear that the excavation necessary to build such large buildings will unsettle the earth under or near the Julia Morgan building either immediately or in the future causing irreparable harm. We must preserve the Julia Morgan building as it is an essential architectural monument for San Francisco.

Projects of this scale create tremendous carbon emissions during construction and ongoing operations. Considering the limited residents served by all of this new construction, I do not think it is worth the pollution it will create. And many of the residents of the Heritage will be displaced and the ones that remain will be the most effected by the environmental disruption, pollution, dust both inside the buildings and outside. The impact of 5 years of construction - digging up dirt that sits on former gas tank sites and other known pollutants, traffic flow problems, parking for residents in the neighborhood, workers and residents at the Heritage and all the visitors to Moscone Park and Ft. Mason - all to add 23 units? Many of these problems will continue after construction as well when you have such a massive institution in a residential neighborhood.

This project is frankly out of scope. If they wanted to build a giant new luxury building to house new residents there are many areas of the City that are zoned for this type of project and as a not for profit with $100 million (according to the financials posted on their website when I checked earlier in the year) they could easily afford this.

Please reconsider the project as a much smaller addition, if any, potentially just replacing the 1 story building that was decommissioned and improving the existing large building on the east side of the property. The goal should be to restore the Julia Morgan building so it shines, rather than relegating it to the front door of a large complex.

Sincerely Yours,

-Todd

G. Todd Eichler
415 336-3424

From: Ferrier, Andrew P
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna Street CEQA Notice
Date: Monday, November 27, 2023 7:35:09 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I am submitting a response to the CEQA Notification with respect to 3400 Laguna Street due by December 1, 2023.

I am opposed to this project due to the following reasons:

1. The proposal obfuscates its true intentions. It is misleading in terms of the scale of the project as well the impact it will have on the existing structure and surrounding neighborhood. In the most simplistic terms, it proposes too much density for the specific lot in question as well as its neighborhood.

2. The neighborhood is zoned residential, this specific lot is classified RM-1 and the business is functioning under a Conditional Use Authorization. To allow this operation to dramatically increase its square footage runs counter to the zoning code.

3. The proposed change to the original building's entrance is a thinly veiled attempt to circumvent SF's building codes by altering what would be considered front versus rear.

4. The historically significant building design by Julia Morgan will be dramatically altered and completely overshadowed by the new construction.

5. As currently oriented, the building and senior living facility co-exist with its surroundings in a reasonable manner. However, adding 58,000 square feet of space would be a dramatic shift in terms of scale and presence. I live nearby in a two story building that is a total of 2500 square feet. To add what is essentially 23 times the amount of my building's space to a single lot would materially and irreparably harm the balance of what is intended for this enterprise and our neighborhood.

6. The amount of proposed excavation work is significant and should trigger an environmental impact study.

I implore the SF Planning Commission to not approve the proposal as submitted. In my

opinion and consistent with SF Planning zoning regulations and objectives, this project should be reconsidered in its entirety with its scale and impact dramatically reduced.

Thank you for your consideration.

-af

Andrew Ferrier
3256 Octavia Street
415 999-2354

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From: Charlton Gholson
To: Poling, Jeanie (CPC)
Date: Friday, December 1, 2023 11:31:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I am writing to you in regards to the Environmental Impact Review notice for the project at 3400 Laguna Street (2022-009819ENV). My fundamental concern remains that its proposed scope is detrimentally massive and wildly out of place in a completely residential neighborhood. I believe several issues could arise that will irreversibly damage quality of life for residents in the area and the character of the neighborhood – both during the project and if it is completed as proposed.

Issues during the project

The proposed renovation will last a minimum of 6 years, which is a substantially longer timeframe than even the most drastic renovations on homes in the area. Adding to this, the Heritage on the Marina is a sensitive use building. During that period, the following issues are likely to arise from the excavation:

1. **Air pollutant exposure.** The site is in an Air Pollutant Exposure Zone, which puts nearby residents at risk of toxic airborne concerns (including the already more susceptible residents at the Heritage).
2. **Noise pollution.** Development is slated to last 6 years and is significantly larger than typical residential projects in the area (141,579 sqft vs. ~6000).
3. **Traffic and parking.** Loss of parking during this project is a concern for an already busy traffic and congested parking area. Laguna Street is busy with both vehicle and pedestrian traffic (requiring 3 crosswalks with flashing lights) and includes an active bus route.

Additional issues if the project is completed as proposed

The Heritage operates across consecutive buildings near its historic Julia Morgan building as a single facility, which should already make it inappropriate for a 100% residential neighborhood. The proposed project would push it farther away from both the planning code and the character of the neighborhood. The project will require a variety of variance, waivers, and exceptions from code requirements as proposed.

1. **Loss of a historical resource.** The new modern buildings will overwhelm and detract from the historic Julia Morgan Heritage building – they will be significantly taller and physically shadow the Heritage building, and the flat roofs will look odd and angular next to the sloped gables of the Heritage building. The Morgan building is an important cultural resource and the new buildings will overpower it and negatively impact its aesthetic.

2. **Shadowing of public gathering spaces.** The building is adjacent to two parks and recreational areas and will substantially shadow both of those sites. The elevator and utility penthouses will exceed 50’ feet in height, which is unusually tall for the area.
3. **Loss of open space.** Removing the existing trees and landscaping to put in a stark façade facing the residential block on Francisco takes away so much open space on their lot they would need a variance or exception for the rear yard requirement. And again, adding nearly 60,000 square feet of new building is a dramatic over the top impact to the neighborhood.

I consider myself very pro-development, particularly when it comes to residential development in the Marina neighborhood and our city more broadly. There are several renovation projects within a square block happening now that are all welcome sights – keeping the character of the buildings intact (and their relationships to one another) with limited disruption to residents.

The Heritage on the Marina’s proposal, however, is not residential development: it is an overreach. Their organization has somehow acquired multiple consecutive properties over time near its historic Julia Morgan building, and they now believe they have license to redevelop an entire city block as a single imposing facility that maximizes their space and revenue. The project should have serious mitigations put on it or at minimum require further study.

Sincerely,
Charlton Gholson

TO: jeanie.poling@sfgov.org
CC: Catherine.Stefani@sfgov.org
Jeffrey.horn@sfgov.org

Case No. 2022-0009819ENV

Dear Ms. Poling,

I am a long-time resident of the Marina District and am writing to share my concern about the proposed development/expansion plans for The Heritage assisted living facility at 3400 Laguna Street. While I find it deeply troubling that the city would consider such massive new structures to encroach on what is undoubtedly one of the Marina's – and perhaps even city's – finest architectural treasures, I am equally concerned about the impact enlarging this medical institution will have on traffic and congestion.

The intersection of Bay and Laguna streets is one of the Marina's busiest and most complicated intersections. Even on calm days it's a busy intersection. Fleet Week, Fourth of July and other major events aside, regular weekly and seasonal events (e.g., Fort Mason Farmer's Market) already significantly increase congestion and create a general sense of chaos that affects streets and pedestrian flow for blocks.

I strongly urge San Francisco Planning to demand The Heritage demonstrate that their proposal to add relatively few new living units for wealthy elderly outweigh the many negative effects of this proposed project – including increased traffic, congestion, added pressure on parking and visual impairment/destruction of the Julia Morgan Building – will have on the surrounding neighborhood and cultural and tourist attractions.

Sincerely,

Brenda Goldstein
2490 Chestnut Street, #102
San Francisco CA 94123

Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Jeanie.poling@sfgov.org

Case No:	2022-009819ENV
Project Address:	3400 Laguna Street (Heritage on the Marina)
Block/Lot:	0471/003
Subject:	Protest Against Construction Project Impacting Julia Morgan Mansion and Concerns Regarding CEQA Issues

November 30, 2023

Dear Ms. Poling,

I am writing to express my deep concerns and objections regarding the proposed construction project in the vicinity of the historic Julia Morgan mansion at 3400 Laguna Street. As a concerned citizen, I strongly protest this project due to the detrimental impacts it poses on various critical aspects, including historical preservation, environmental concerns, and community well-being.

The Julia Morgan mansion stands as an invaluable testament to our cultural heritage, embodying the architectural brilliance and historical significance of its time. Any construction activity at the Project Address must prioritize the preservation and protection of this iconic landmark. It is imperative to safeguard our cultural heritage for future generations and ensure that its integrity remains intact. The project proposed by the Heritage on the Marina (the "Heritage") does not meet this standard. If the project as proposed is permitted by SF Planning, the mansion will be completely enclosed on three sides by nearly 60,000 square feet of new construction consisting of two near 4-story plus modern buildings. They will physically and visually tower over the mansion, making it seem a subordinate structure, and their construction will eliminate the existing landscaping and openness that now characterize this parcel of land. I also understand that the conditional use authorization under which the existing Health Care Center was allowed explicitly limited it to a height of one story, and the Heritage is ignoring this restriction when it proposes to replace the Health Care Center with a four-story building spanning almost its entire frontage on Francisco Street. Finally, the Heritage is proposing significant alterations to the mansion when it suggests abandoning its front entrance on Laguna Street and building a new one on Bay Street. The Heritage wants to do this in order to reorient the property from its existing east-west axis (Laguna Street to Octavia Street) to a north-south axis (Bay Street to Francisco Street) in order to treat Francisco Street as the "rear" of the property. As a historic resource, the mansion and its landscaping should be protected under the California Environmental Quality Act (CEQA).

Moreover, the project raises several other critical issues under the CEQA that cannot be overlooked. These concerns encompass a wide array of areas such as noise pollution, air quality degradation, land use and planning concerns, geological stability, transportation disruptions, and the casting of significant shadows on nearby parks and private residences.

The introduction of construction activities, particularly in historically sensitive areas, is bound to generate significant noise pollution, disrupting the tranquility of the neighborhood. The Heritage is seeking permission to do construction for at least 55 hours per week and from 8 am to 7 pm. This is a quiet neighborhood full of families and retirees, including the frail and elderly residents of the Heritage itself, who will be living amid this disruptive construction for many years. It is not appropriate to subject so many San Franciscans to this level of noise for such an extended period solely to benefit one organization.

Land use and planning must be carefully assessed to ensure that any development aligns with the historical context of the area and respects the integrity of landmarks like the Julia Morgan mansion. Geologically, the site should undergo rigorous evaluation to mitigate any risks associated with construction in potentially unstable terrain. The Heritage is proposing very significant excavation – over 15,000 cubic yards and a depth of 15 feet below grade – with much of this work being done next to the mansion, which could undermine its century-old foundation. In addition, prior SF Planning reports found that the property is an archeologically significant area, and it is not clear that the Heritage is planning to or prepared to protect any archeological resources that are unearthed during its project.

Furthermore, the proposed construction's impact on transportation needs meticulous evaluation to prevent congestion, ensure public safety, and preserve the accessibility of the area. The Heritage is adjacent to two parks – Moscone Field and Fort Mason – which are very heavily used and whose visitors rely largely on street parking. Yet, the Heritage is asking San Francisco to “gift” it two street parking spots (15 feet) on Bay Street for its private use as part of a new driveway as well as parts of public right of way on Bay Street and Francisco Street for bicycle parking. In addition, the sheer influx of additional residents, staff members and employees will overwhelm the neighborhood’s already limited parking.

The potential casting of shadows on nearby parks due to the construction's height and orientation should also be thoroughly studied, considering the implications for recreational spaces and environmental balance. I was alarmed by the significant shadowing shown in the “preliminary shadow fans” filed for this project. As you can see in the following diagram, the impact is severe, especially on Moscone Field’s baseball diamond, which is one of the most heavily used in San Francisco.



In light of these concerns, I urge SF Planning to conduct a comprehensive and transparent assessment of the proposed construction project's environmental impacts under the CEQA guidelines. It is crucial to engage in meaningful public discourse and consider alternative solutions that prioritize historical preservation, environmental sustainability, and community well-being.

I implore you to reconsider the potential ramifications of this project on the Julia Morgan mansion and its surrounding environment. Please ensure that adequate measures are taken to mitigate the adverse effects and preserve the cultural and historical legacy of our community.

Thank you for your attention to this matter. I eagerly await your response and action on this pressing issue.

Sincerely,

Margaret Grohne
mgrohne@gmail.com

From: personal@rodhall.net
To: Poling, Jeanie (CPC)
Subject: Concerns Re: Heritage project proposed in Marina
Date: Wednesday, November 29, 2023 3:05:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I am writing to express my concerns regarding the proposed project at 3400 Laguna Street and its potential negative impact on the local neighborhood, parks, and, Julia Morgan building.

My family and I are frequent visitors to Moscone Park and Ft. Mason. The prospect of constructing massive rectangular buildings surrounding the Julia Morgan building raises significant issues that warrant careful consideration.

The visual impact of the new buildings on the Julia Morgan structure is a major concern. The square angles of the proposed development compromises the integrity of the sloped roof and unique texture of the Julia Morgan building. Not to mention visually blocking the Morgan building and covering it in a shadow. The removal of the corner gardens and greenery along the southern border is also distressing, as it contributes to the overall charm of the neighborhood. And, as far as I can see, the middle gardens will also be substantially removed, these were essential elements to Julia Morgan's original architecture.

Beyond aesthetic concerns, there are serious worries about the environmental impact on our health and the community at large. The demolition of existing buildings, constructed in a time when hazardous materials such as asbestos were prevalent, raises concerns about airborne pollutants affecting the entire neighborhood. The construction phase is anticipated to bring pollution from machinery and trucks, increased traffic, noise, and excavation debris, which will persist for an extended period of over three years. Lastly, the excavation of a massive amount of ground may render nearby buildings unstable.

Moreover, the completion of the project, adding almost 60,000 square feet for minimal residential units, raises questions about the unnecessary carbon footprint and its subsequent impact on the community. This includes increased traffic, reduced public parking for park users, amplified noise, pollution from idling trucks starting at 6 or 7am, blocked driveways on Francisco street, increased refuse from construction and many other inconveniences. And when the project is completed the neighborhood will have a more institutional feel.

In light of these concerns, I urge you to consider an alternative approach that preserves the integrity of the historic Julia Morgan building. Perhaps one that adds REAL housing (not just a few units for extraordinarily wealthy retirees who need an onsite pet spa!).

I appreciate your attention to these matters and trust that you will carefully evaluate the potential impact of the proposed project on our community's well-being.

Sincerely,
The Hall Family

From: Mike Hebel
To: Poling, Jeanie (CPC)
Cc: wlabounty@sfheritage.org; adamklafter@gmail.com; Tania Albukerk
Subject: 3400 Laguna Street, Environmental Impact Report
Date: Monday, November 27, 2023 7:38:34 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling:

RE: Heritage on the Marina
AKA: San Francisco Ladies' Protection and Relief Society
3400 Laguna Street
Notice of Preparation of an EIR
Case No.: 2022-009819ENV

The Heritage has submitted plans for a 60,000+ sq.ft. multi-year construction project directly in front of our residence at 1553-1555 Francisco Street. Our building, along with 1547-1549, 1557-1559, 1561-1563, and 1567-1569 , are 5 adjacent four-story, architecturally significant buildings – often referred to as prime examples of the Marina Mediterranean style. Our buildings, along with the 1925 iconic Julia Morgan building (3400 Laguna Street, Heritage's front on Laguna Street) are distinctive architectural landmarks in our neighborhood.

Our environmental concerns about Heritage's Preliminary Project Assessment submission are:

1. The 4-story addition along the north side of the 1500 block of Francisco Street is out-of-place and overwhelming in this residential neighborhood. The new proposed modern building will detract, denigrate, and overwhelm both the Julia Morgan Building as well as our Marina Mediterranean homes (built between 1925 and 1929). The proposed addition will shadow the Julia Morgan building and partially block it from view on the Francisco Street side. The fortress-like proposal will cause a substantial adverse change in the significance of the Julia Morgan building as well as the significance of the 5 Marina Mediterranean style buildings.

2. Proposed construction in our neighborhood is to last approximately 3 years. This will fill our neighborhood's streets with construction vehicles, dirt and debris, significant construction noise for 6 days a week, traffic and bicycle lane blockings (there is a bicycle lane on the south side of Francisco Street), the loss of many parking spaces on both sides of Francisco Street as well as along the 3400 block of Laguna Street, and the disturbance of the peaceful enjoyment of this neighborhood when shared for 3 plus years with a multitude of construction workers and their equipment.
3. The proposed construction calls for earth excavation of nearly 30,000 cubic feet. We are in an air pollutant exposure zone. This project will generate significant air pollutants during the long excavation period. Of important note, this construction's earth excavation will be contiguous to the former North Beach Manufactured Gas Plant which was located at the intersection of Bay and Laguna Streets and is a current environmental investigation site.
4. Heritage on the Marina is adjacent to two parks and recreation areas (Moscone Park & Recreation and the Fort Mason National Recreation Area). Heritage shares these two natural resources with the entire San Francisco Marina neighborhoods. Its long period of construction will negatively impact the public's enjoyment of these coveted natural resources during the 3-year construction period.
5. When the elevator shaft and utility appendage on top of the proposed four-story Francisco Street building are considered, the height will exceed 50 feet causing shadowing. This proposed building height is unusually tall for our neighborhood.

I am 79 years old. My wife is 75. We purchased our home in 2001 and considered it our last residence. I will soon be retiring after a 28-year career with the San Francisco Police Department and a nearly 50-year career as an attorney for the San Francisco Police Officers' Association (20-year employment overlap). We anticipated the peaceful enjoyment of our home and its neighborhood during our retirement years. Now Heritage on the Marina has proposed a grossly out-of-place addition to its continuing care retirement facility. It is my understanding that the average age of the current

residents is 85. By the time this project is completed (2030) I will exceed its average resident's age.

This proposed large, nearly gargantuan, expansion of the Heritage on the Marina (logo "Retie in Style") is out-of-place in a residential neighborhood. It should not be further out of conformity with relevant codes. This project, as now conceived, will require a variety of variances, waivers, and exceptions from current code requirements. Its nonconforming use should not be allowed to go further out of conformity.

When asking the question "what does this proposed construction project do to improve our neighborhood, the answer – most unfortunately – is "nothing." Its residents, present and future, are not asked, as a condition of admission, whether they have any connection to San Francisco. They are asked about their wealth – can they afford an upfront payment of at least $550,000 plus $8,000/month for a one one-bedroom apartment. There will be no affordable housing here only luxury residences.

Thank you.

Mike and Gityjoon Hebel

Cc: Tania Albukerk, chair, "Save The Marina's Heritage" – a San Francisco registered community organization

wlabounty@sfheritage.org ; Mr. LaBounty is CEO and President of San Francisco Heritage

adamklafter@gmail.com; Mr. Klafter is Vice-President and Preservation Committee chair for Victorian Alliance of San Francisco

Encls: Relevant Correspondence from SF Heritage dated April 4, 2023, and June 12, 2023

Michael S. Hebel
Attorney at Law
Certified Financial Planner

POA Welfare Officer
San Francisco Police Officers' Association
800 Bryant Street, 2nd Floor
San Francisco, CA 94103
Office: (415) 861-5060
Mobile: (415) 613-1726
Fax: (415) 552-5741

Heritage
3400 Laguna St.
S. F.
94123

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RECEPTION DESK

Jeanie Poling,
SF Planning
49 So Van Ness, Ste 1400
San Francisco, CA 94103

9410-379850

November 30, 2023

Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Dear Ms. Poling,

I am a resident of The Heritage on the Marina and I recently read the communication regarding the Environmental Impact on our property. We were told by the staff that the impact would be minimal, mostly upgrades and some new facilities. But reading your packet this does not seem to be the case. I spoke with other residents, and we are quite concerned about the disruption, noise and dust created by the construction.

I moved here because it was peaceful and near the parks. I paid a tidy sum to live here, and I would like to continue to enjoy my limited remaining time here at the Heritage. Even something as simple as a nap during the day will be hard to come by. I worry about many parts of this project but one in particular is losing our beautiful gardens.

I was told it is not necessary to send a letter because my concerns were heard but I felt I must. I am not the only resident at the Heritage who feels this way. I feel that I speak for many of us when I say that we are tremendously worried that our remaining years here at the Heritage will be very unpleasant.

On behalf of concerned residents of the Heritage on the Marina thank you for your understanding,

From: Mark H
To: Poling, Jeanie (CPC); Delumo, Jenny (CPC)
Subject: Fwd: Opposition to 3400 Laguna St case #2022-009819ENV
Date: Monday, November 27, 2023 8:13:59 AM
Attachments: 3400Laguna2.docx

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November 27, 2023

TO: Jeanie Poling, SF Planning

FROM: Mark Herrmann, respighi1@gmail.com

RE: 3400 Laguna Street

Dear Ms. Poling & the SF Planning Commission,

As a resident of the 3200 block of Octavia Street, I have several concerns about the proposed development of the Heritage on the Marina at 3400 Laguna Street. Two of those concerns potentially reflect "environmental" issues which should be addressed before even a modified version of this proposed construction is presented to Planning and to the public.

Physical Size

First, the City's "Notification of Project Receiving Environmental Review" dated May 30 is misleading. It states that there is "zero net change" to the number of building stories and building height. While that may be technically true by treating all the buildings as a group, the proposed "Francisco Building" will change from its existing one-story to four stories plus the additional height of mechanical rooms. Neighbors may consider this improper notification.

Second, the size and location of the proposed Francisco Building will further envelope the historically noteworthy Julia Morgan main building. The Francisco Building, with its 50' high roof structures, will be taller than the JM building. It will create significant shadowing of the JM building and it will partially-to-wholly obstruct public views of this architectural masterpiece from the sidewalks on Francisco and Laguna streets, and from some areas of Moscone Park. Its height may also loom behind the JM building as viewed from the North at Fort Mason. The Francisco building will completely hide about 75% of the south side of the JM building from any view. The documented style of noted architect Julia Morgan needs to be respected. I recommend further light/view/height studies, which will likely result in a recommendation of scaled-down construction. Furthermore, any attempt to relocate the "front" of such an architecturally significant main building to satisfy Planning will likely be met with resistance.

Lastly, as you know, The SF Ladies Protection and Relief Society ("SFLPRS"), has been quietly buying

adjacent two-unit properties in assessor's block # 0471 (bordered by Laguna, Bay, Octavia & Francisco Streets) and converting them to apartments for its more self-sufficient residents/patients. Between 2008 and 2016 the SFLPRS purchased 3325-27 Octavia St. (2 units converted to 3), 1536-38 Francisco St. (2 units converted to 3) and 1530 Francisco St. (2 units converted to 4). On a square footage basis, the SFLPRS now owns approximately 70% of the entire city block bordered by these 4 streets. Although this may not fall within an "environmental" issue, as defined by Planning, I believe the City should be concerned about concentrated ownership of a city block, especially given the potential of the JM building receiving historical status and because of the financial risks outlined below.

Each additional proposed residential care suite adds 2538 square feet of building space. Even allowing for a substantial percentage of floor space dedicated to common & institutional areas, these appear to be luxury units. SFLPRS offers no affordable housing, no need-based aid, and in fact profits on the early death and turnover of its residents, as outlined in its financial disclosures. The owner pays no federal income tax, no state tax and de minimis SF property tax. Also, this project will not add any "housing units" as defined by the SF building code, therefore any supportive public commentary to that effect will need to be disregarded.

Financial Woes

As shown in SFLPRS's publicly available financial statements, it recorded a loss from operations of $6.2 million in 2021 following a loss from operations of $5.7 million in 2020, a loss of 4.8 million in 2019 and a loss of $4.1 million in 2018. It was only able to turn an overall profit in 3 of 4 of these years because of investment income and gains on approximately $81 million of liquid investments. This is a money losing business looking to double down.

The proposed project is estimated at $30M and we all know what that means - $40M minimum. SFLPRS has a strong balance sheet but if it spends $40M on this project it will have only $41M in liquid assets remaining if the stock and bond markets cooperate. A few more years of negative operating profits combined with a market decline could quickly put this owner (of the majority of a prime square city block) in line behind the string of businesses walking away from San Francisco.

I would expect strong opposition to this project in its current form.

Thank you,

Mark Herrmann
respighi1@gmail.com

From: Dawn Iparraguirre
To: Poling, Jeanie (CPC)
Subject: Re: 3400 Laguna Street
Date: Tuesday, November 28, 2023 10:31:12 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I think the Planning Department should reconsider any construction at 3400 Laguna based on concerning environmental issues.

The proposed project at 3400 Laguna is expected to last for over 5 years, significantly longer than any home renovations, I mention this because it is in a residentially zoned neighborhood. And the historic Julia Morgan building will create additional issues as I refer to below.

Issues during excavation and construction:

1. Air pollutants: The site is located in an Air Pollutant Exposure Zone, putting nearby residents at risk of airborne toxins, especially those at the Heritage and children playing across the street at the Moscone playground (the one for very young children at Chestnut and Laguna). This will be especially acute during demolition and excavation of 20,000+ square yards of dirt/sand.
2. Traffic and parking: The loss of parking spaces during the project will exacerbate the existing traffic and parking problems in the already busy area and force traffic from Bay and Laguna (which has buses and an important crosswalk) to Octavia and Francisco (which has a bike lane).
3. Noise pollution: The project's duration and larger scale compared to even the largest residential projects in the City will contribute to increased noise pollution. 3400 Laguna is in a Residential zoned neighborhood.

Further Issues once complete:

4. Loss of a historical resource: The new, large, modern buildings will overshadow and detract from the historic Julia Morgan building obstructing views and potentially putting the building at risk from excavation and construction. This is one of Julia Morgan's greatest works and as a City we should preserve and promote it, not obscure it within large, modern rectangular buildings.
5. As a woman, with a daughter, I think it is extra important to promote works of pioneers like Julia Morgan so future generations have role models. Especially in male dominated fields. As a reference, Julia Morgan was the architect for Hearst Castle! She started working before women were even allowed to vote. There are almost no other notable examples of buildings by other historically recognized woman architects in San Francisco, making this building incredibly important.
6. The addition of the new construction is disproportionate to its surroundings and it will change the scale and scope of the neighborhood.
7. Shadowing of public parks and spaces: The adjacent parks will be significantly shadowed by the new buildings, detracting from their appeal and usability. Once the

height of the elevator and mechanicals are added it will be far in excess of the 4 story limit for the area.

8. Loss of landscaping: The removal of existing trees and landscaping for the new building is the equivalent of changing the architecture of the building not to mention taking away the green space that connects the Heritage to the parks.

I generally support residential housing development, especially housing that is tied to affordable housing, however, the Heritage on the Marina's proposal is not in the spirit of the City's policy's of residential development. It will not only be a blight on the Marina but it will also cause potentially grave health concerns for the elderly (at the Heritage itself) and children.

Sincerely,
Dawn Iparraguirre

From: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Sent: Wednesday, November 1, 2023 1:26 PM
To: dhshell116@msn.com <dhshell116@msn.com>
Subject: 3400 Laguna Street

Hello,

The following documents regarding the proposed project at 3400 Laguna Street in San Francisco were published today.

Notice of Availability of Notice of Preparation of an EIR

Notice of Preparation of an EIR

Kind regards,

Jeanie Poling, Senior Environmental Planner
Environmental Planning
San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7559 | https://sfplanning.org/
https://sfplanningis.org/pim/

From: Peter Kagel
To: Poling, Jeanie (CPC)
Cc: Woody LaBounty
Subject: 3400 Laguna Street Project November 1, 2023 2022-009819ENV Opposition from Peter Kagel , neighbor
Date: Friday, November 3, 2023 9:23:00 AM

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Dear Planning Department,

What troubles me is the loss of parking on Bay Street. The notification does not say where the loss would be, or perhaps I'm not familiar enough to understand, but, in any case, the loss of parking could only be adjacent to Moscone Park which is totally unacceptable because it would affect the Park's access and usage. Please clarify where the parking would be lost.

Thank you,

Peter Kagel

1550 Bay St., Apt. 430

SF HERITAGE www.sfheritage.org 2007 FRANKLIN STREET SAN FRANCISCO, CA 94109 415 441 3000

November 26, 2023

Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 S. Van Ness Avenue, Suite 1400
San Francisco, CA 94103

RE: 3400 Laguna Street (Case No. 2022-009819ENV), Scope of Environmental Impact Report

Dear Ms. Poling,

I am writing in response to the Notice of Preparation of an Environmental Impact Report in connection with the proposed expansion project at 3400 Laguna Street (Case No. 2022-009819ENV).

San Francisco Heritage is a 52-year-old nonprofit organization with a mission to preserve and enhance San Francisco's unique architectural and cultural heritage. Our primary concern with the proposed project is the scale of the new structures in relation to the 1925 Julia Morgan-designed building, the caretaker's cottage, and the historic composition of a campus eligible for listing in the California Register of Historic Places.

The addition of 58,000 square feet and 23 residential care suites as currently proposed will obscure the massing of the historic structures on site (as well as the five small-scale 1920s-era structures on Francisco Street). The proposed re-orientation of the site entrance from the Morgan building on Laguna Street to Bay Street would also significantly alter the visitor experience of the historic structure.

Heritage recommends the scope of the Environmental Impact Report (EIR) provide a comprehensive analysis and consideration of minimizing the visual impact of the proposed project on the Julia Morgan building and caretaker's cottage.

Sincerely,

Woody LaBounty
President & CEO

From: Range, Jessica (CPC)
To: Delumo, Jenny (CPC); David Lester
Cc: Poling, Jeanie (CPC)
Subject: Re: Heritage Expansion 3400 Laguna St, Case No. 2022-009819ENV
Date: Friday, December 1, 2023 2:00:26 PM

Dear Mr. Lester,

I am confirming receipt of your comments below.
Regards,

Jessica Range

Get Outlook for iOS

From: Delumo, Jenny (CPC) <jenny.delumo@sfgov.org>
Sent: Friday, December 1, 2023 1:08:12 PM
To: David Lester <djlester@sbcglobal.net>
Cc: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>; Range, Jessica (CPC) <jessica.range@sfgov.org>
Subject: FW: Heritage Expansion 3400 Laguna St, Case No. 2022-009819ENV

Good afternoon,

Thank you for contacting the Planning Department regarding the 3400 Laguna Street project. I am no longer the environmental planner for this project, but am copying Jeanie Poling and Jessica Range, the environmental planners currently working on this project, on this message.

Kind regards,
Jenny

Jenny Delumo, AICP (she/hers)
Senior Planner and Transportation Review Team Lead
Environmental Planning Division

San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7568 | www.sfplanning.org
San Francisco Property Information Map

From: David Lester <djlester@sbcglobal.net>
Sent: Thursday, November 30, 2023 2:46 PM
To: Delumo, Jenny (CPC) <jenny.delumo@sfgov.org>
Subject: Heritage Expansion 3400 Laguna St, Case No. 2022-009819ENV

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I am writing in response to the notification sent regarding the Heritage on the Marina's proposed

project at 3400 Laguna Street.

I have lived in the marina for 20 years across from the Heritage. Part of the reason I bought my place was the view of the Julia Morgan building that is the heart of the Heritage. One of the highlights of being across the street was the beautiful setting and architecture of the Julia Morgan building along with the complimentary buildings on Francisco street with the iron balconies. The Heritage has always been a good neighbor to have. However it now seems the new CEO and the Heritage's focus is all about expanding. The current building fits and is appropriate for the neighborhood vs the proposed hospital sized expansion.
I have attended two meetings with the Heritage. The first via Zoom in September 2022 at which time the Heritage took the position it had the 'right' to build the maximum density without regard to current zoning. The second time in April 2023 at which time the Heritage admitted that it does not have any "right to build" but needs the waivers and variances and asked for our feedback. We gave feedback but it appears the Heritage has completely disregarded them.

I mention the prior to give some context. My concerns are stated below.

1. The part of the Marina occupied by the Heritage is zoned residential and the Heritage is permitted to operate by pre-existing exemption and variances. Granting a variance to build an additional 58,000 square feet will completely change the scale, scope and character of the neighborhood. It will truly become Institutional, no longer Residential as it is currently zoned.
2. The new buildings will conceal the Julia Morgan Building both at ground level and higher up because a 4+ story obstruction will not allow any view of the Julia Morgan building and completely overshadow the historic structure. I imagine this is why the health care center was only allowed to be 1 story. The Perry building was built before the health care center and it was originally to be 3 stories then it was increased to 4 stories, so why would a building built after the Perry building only be 1 story? It seems likely that this was part of a Notice of Special Restriction No. 4506 (NSR) issued to the Heritage.
3. Part of what makes the Julia Morgan building so special is its integration with the gardens and open space. It was part of the architecture. This was a signature of Julia Morgan's designs. The current proposal would severely diminish the green space.
4. I am a big proponent of more housing in this City. However, adding only 23 super luxury units across nearly 60,000 new square feet does not accomplish that goal. Those units will only be occupied by 1 or 2 residents. These units will not be accessible to everyone - no families, no working people and certainly no affordable housing. If this project were truly residential, the proposed property would easily house over 300 people; as it stands, it will probably be under 100 residents because it is a very high end luxury retirement community with excessive amenities.
5. There will be a massive excavation. I do not see how it is possible to contain the dust from the digging. Considering this is a Air Pollutant Exposure Zone the construction will put the neighborhood, especially children and the elderly, at risk. In particular the elderly that already live at the Heritage.
6. With an additional 60,000 square feet, the institution will roughly double in size. This will cause parking and traffic problems just like we see at the whole foods on Franklin and the one on 24th street and the trader joes on Masonic. Parking is always an issue on these new

projects. The parking in the neighborhood is already tight and Heritage workers routinely park without permits in the neighborhood.

7. Traffic at Bay and Laguna will get worse and more dangerous and that will flow over to the neighboring streets.
8. Most importantly. How can the Heritage change their frontage to Bay street to allow for a 2nd back yard. They have already built the 4 story Perry building in the rear yard with no set back. You only get one back yard.

Please keep in mind that the Heritage is a not for profit entity which means that it is TAX PAYER supported. As a local, Federal and California tax payer I should have more of a say than if this property were owned by an entity that pays its fair share of taxes. I am happy to discuss any of my concerns regarding the environmental impact of this proposal in person or by phone.

Sincerely,

David Lester
1561 Francisco St.
SF CA 94123

From: philip@philipmeza.com
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna CEQA notice
Date: Monday, November 27, 2023 12:01:17 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I am writing in response to the CEQA notification due December 1, 2023 about Heritage on the Marina's proposed project at 3400 Laguna Street. I have several environmental concerns regarding this project.

1. The part of the Marina occupied by the Heritage is zoned residential and the Heritage is permitted to operate by pre-existing exemption and variances. Granting a variance to build an additional 58,000 square feet will completely change the scale, scope and character of the neighborhood. It will truly become Institutional, no longer Residential as it is currently zoned.

2. The new buildings will conceal the Julia Morgan Building both at ground level and higher up because a 4+ story rectangle will not allow any view of the Julia Morgan building where there was previously a view. I suspect this is why the health care center building was only allowed to be one story high. The Perry building was built before the health care center and it was originally to be 3 stories then it was increased to 4 stories, so why would a building built after the Perry building only be 1 story? It seems likely that this was part of a Notice of Special Restriction No. 4506 (NSR) issued to the Heritage.

3. Part of what makes the Julia Morgan building so special is its integration with the gardens and open space. It was part of the architecture. This was a signature of Julia Morgan's designs. The current proposal would severely diminish the green space.

4. I am a big proponent of more housing in this City. However, adding only 23 super luxury units across nearly 60,000 new square feet does not accomplish that goal, especially because those units will only be occupied by one or two residents. Further, these units will not be accessible to everyone - no families, no working people and certainly no affordable housing; in fact, many of the Heritage residents are recruited from outside of San Francisco. If this project were truly residential, the proposed property would easily house over 300 people; as it stands, it will probably be under

100 residents because it is a very high end luxury retirement community with excessive amenities – supported with tax payer dollars as it is a 501c3 (not for profit organization).

Regards,

Philip Meza

From: Morgan Mohun-Gholson
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna Street (2022-009818ENV) Concerns
Date: Friday, December 1, 2023 11:44:56 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Ms. Poling,

I hope you've had a good week! I apologize for the late entry here (our family has been taken out with the flu this week and it's been terrible to play catch up), but hope that our concerns can be included in your analysis.

I am writing to you in regards to the Environmental Review notice for the project at 3400 Laguna Street (2022-009818ENV). While I am all for The Heritage updating their facilities to provide better care for their senior residents, my fundamental concern is the scale of the new structures and the impact throughout construction to not only the historically significant Julia Morgan building but the surrounding residential community.

There are several issues that would arise both during and after completion that will cause irreversible damage to the quality of life for residents and future residents.

The proposed renovation will be completed by 2029 (if completed in a timely manner) and over the next six years cause alarming environmental issues:

1. **Air pollutant exposure.** The site is in an Air Pollutant Exposure Zone, which puts nearby residents at risk of toxic airborne concerns (including the already more susceptible residents at the Heritage).
2. **Noise pollution.** Development is slated to last 6 years and is significantly larger than typical residential projects in the area (141,579 sqft vs. ~6000).
3. **Traffic and parking.** Loss of parking during this project is a concern for an already busy traffic and congested parking area as there are two major parks next to the facility. Laguna Street is busy with both vehicle and pedestrian traffic (requiring 3 crosswalks with flashing lights) and includes an active bus route.

The Heritage operates its historical and gorgeous Julia Morgan building as a senior living community and the proposed project would push it farther away from both the planning code and the character of the neighborhood. The project will require a variety of variance, waivers, and exceptions from code requirements as proposed.

1. **Loss of a historical resource.** The updated side and back buildings style

and size will engulf and detract from the historic Julia Morgan Heritage building – they will be significantly taller and physically shadow the Heritage building.

2. **Loss of open space.** Removing the existing trees and landscaping on the south side of the facility to put in a a structure that is double in size of the existing structure will completely change the makeup of Francisco street with it's warmth, nature, and beauty.
3. **Loss of light.** The homes along the south side of Francisco street will lose a significant amount of light due to the more than doubling in size of the facility.

I hope these points are helpful as you are making your decisions and thank you for your time and consideration on this project.

We greatly appreciate your time!

Warmly,
Morgan Mohun-Gholson

From:	Iyla Ollinger
To:	Poling, Jeanie (CPC)
Cc:	Stefani, Catherine (BOS); Horn, Jeffrey (CPC); Terry Peckham; Bart Draper
Subject:	Heritage Expansion Project
Date:	Wednesday, November 29, 2023 3:35:23 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Case No. 2022-0009819ENV; 3400 Laguna Street

Dear Ms. Poling,

I am writing to express my concerns about the potential environmental impacts of the Heritage on the Marina's project at 3400 Laguna Street. I understand that San Francisco Planning is currently accepting comments on the proposed scope of a CEQA environmental impact report, but I want urge the Department to also engage with the San Francisco Department of Public Health to ensure that Public Health in engaged in enforcement the Maher Ordinance with respect to this project.

This site appears on the Maher Map and is subject to the Ordinance. As the historic maps included in the Page & Turnbull Report[1] illustrate, this entire site was probably filled former bay or a marsh and creek area. The excavation for underground parking is proposed at some 15' feet in depth and will cover a wide area.

Based on these considerations, the San Francisco Planning Department should refer this project to San Francisco Department of Public Health for further consideration under the Maher Ordinance. This will ensure a more complete evaluation of the potential environmental impacts of this large and unnecessary development in predominately residential and recreational area.

Regards,
Iyla Ollinger

[1] Figures 51 and 52 (pages 36 and 37) in 3400 Laguna Street Historic Resource Evaluation, Part 1, San Francisco CA; Prepared for the San Francisco Planning Department by Page & Turnbull,; February 16, 2023

--
Iyla Amelie Ollinger

From: John Parsons
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna Street Environmental Comments
Date: Sunday, November 26, 2023 6:05:51 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I thought the Heritage was in a residential zoned area and it was allowed to operate by a variance? Adding many new, very large, buildings will severely impact the parks and neighborhood. It will change the look, take away green space and cover up the very important and iconic Julia Morgan building. I imagine the shadows the new buildings would cast would darken the area. It would create more traffic, trash, and parking problems. I also worry about a 3-year construction project that requires a lot of digging. Why would the current residents want this project?

I do not live in the immediate area anymore, but I frequently visit and I think it would be a shame to turn this block into a 'big institution'. And for what? I think we all want to add housing, but this is a waste, adding 58,000+ square feet for 23 very expensive rental units will create a tremendous burden on the environment for very little benefit to very wealthy people. Frankly, the people that can afford those units have plenty of options, let's build a retirement building for 150 'working class' people using the same resources!

Thank you,
John Parsons

November 24, 2023

Re: Case 2022-009819ENV

Jeanie Poling
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Ms. Poling,

I am in receipt of the San Francisco Planning Department's notice of preparing an Environmental Impact Report for the proposed massive expansion of The Heritage residential care facility at 3400 Laguna Street. While I am not against the The Heritage expanding their facility or replacing the outdated buildings at the rear and side, I believe strongly that the San Francisco Ladies' Protection and Relief Society, which operates the facility, has an obligation to the community to respect and preserve Julia Morgan Building, which anchors the site and is an architectural treasure.

Having lived in San Francisco for more than three decades, and across from The Heritage for more than 20 years, I support development within the Marina when accomplished in ways that contribute to the unique architecture and livability of our neighborhood, and complements the natural and historic features that make San Francisco's northern waterfront so special. Because it is too big, too monolithic and demonstrates complete disregard for our neighbors and neighborhood, I oppose The Heritage's current plan to double its size and crowd-out the historic mansion.

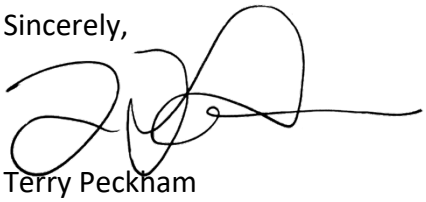
- Built as home "to render protection and assistance to strangers, to sick and dependent Women and Children" in the 1920s, The Heritage is still run by the San Francisco Ladies' Protection and Relief Society, whose mission as a non-profit has clearly shifted to serving the Bay Area's wealthiest and most affluent residents. Asked why The Heritage was being expanded, the society's CEO, Mary Linde, said flatly, "To increase our profits."
- The Heritage's leadership is, at best, being disingenuous with our community. The famed mansion, designed by Julia Morgan and completed in 1925, is the institution's entire marketing identity. Yet by cynically claiming to be moving their entrance to a new building on Bay Street, the society is clearly sidestepping regulations to preserve historic structures and will enable them to construct new buildings that dwarf the historic mansion.

- After having spent years reducing their number of units by converting studio- and one-bedroom units into larger suites, positioning this project as helping solve the city's housing shortage is deceitful, particularly considering how few San Franciscans could actually afford to live there.

In the 20+ years I have lived on Francisco Street, we have always considered the management of The Heritage to be a considerate and conscientious neighbor. However, with their new management team, the San Francisco Ladies' Protection and Relief Society has lost its way, having morphed into a profit-centric machine that shows little-to-no regard for their community or the historical asset their founders entrusted to them.

Clearly, given the low profiles and setbacks of the newer buildings, when The Heritage expanded in the late 1950s the Planning Department understood the intrinsic value of the Julia Morgan building to the city and community. Now, 60 years later, I urge the Planning Department to take the same cautious and respectful approach. I support The Heritage's desire to expand and update their facility, but ask that they be required to do so in a way that doesn't dwarf or encroach upon the Morgan structure and is more in harmony with the rest of the neighborhood.

Sincerely,



Terry Peckham
1563 Francisco Street
San Francisco, CA 94123

From: Christina Pedota Polidore
To: Poling, Jeanie (CPC)
Subject: Neighborhood Concern for 3400 Laguna Street Construction
Date: Tuesday, November 28, 2023 5:04:46 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

I trust this message finds you well. I write to express pressing concerns about the proposed project at 3400 Laguna Street (Case No.: 2022-009819ENV) in our beloved residential neighborhood.

The extensive excavation, totaling 150,000 cubic yards of dirt, raises alarm bells. This significant earth-moving activity not only threatens the historical Julia Morgan Heritage but also poses potential risks to the broader neighborhood.

Julia Morgan Heritage, designed by Julia Morgan in 1925, holds immense historical value for our community. Despite lacking formal recognition on historic registers, its cultural significance is indisputable. The proposed modern buildings, taller with flat roofs, could compromise the unique charm of the Heritage building. I urge exploring alternatives, such as reducing the project's size and carefully citing new additions to preserve the neighborhood's character.

The planned height of the new building, including elevator and utility penthouses exceeding 50 feet, raises concerns about shadowing over our cherished parks and recreational areas. A thorough evaluation of this issue is crucial to maintaining the accessibility and sunlight that define these spaces.

The extensive excavation, particularly in an Air Pollutant Exposure Zone, demands strict adherence to Health Code Article 38 regulations. Excavation activities are likely to generate air pollutants, requiring an Environmental Evaluation Application. Proactive measures must be taken to prevent potential toxin migration, given the proximity to a hazardous waste site at 1598 Bay Street.

Parking and traffic concerns are evident with the addition of 38 new parking spaces and a new curb. A comprehensive evaluation of the project's impact on parking availability, traffic flow, and neighborhood safety is essential.

The potential loss of open space and landscaping is disheartening. The proposed elimination of trees and landscaping in favor of a stark facade is concerning. Additionally, adding nearly 60,000 square feet of new building space seems disproportionate and out of harmony with the neighborhood.

Lastly, scrutinizing variances, waivers, and exceptions is crucial. Further deviations from the norms of our 100% residential neighborhood risk exacerbating discordance. Upholding existing code and preserving the neighborhood's integrity should take precedence.

I strongly urge the Planning Department to conduct a comprehensive environmental review of the proposed construction at 3400 Laguna Street in accordance with CEQA guidelines. The concerns outlined underscore the need for meticulous evaluation and community well-being.

Thank you for your consideration.

All the best,

Christina Pedota

From: Todd Polidore
To: Poling, Jeanie (CPC)
Subject: Regarding Proposed Construction Project at 3400 Laguna Street
Date: Tuesday, November 28, 2023 3:12:49 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Delumo,

I trust this message finds you well. I'm reaching out to share profound concerns about the proposed project at 3400 Laguna Street (Case No.: 2022-009819ENV) in our cherished residential neighborhood.

A primary worry centers around the substantial excavation planned, involving a significant 150,000 cubic yards of dirt. This extensive earth-moving activity raises concerns, not only regarding its potential impact on the historical Julia Morgan Heritage but also for the broader consequences it might bring to the surrounding neighborhood.

Julia Morgan Heritage, an architectural gem by Julia Morgan in 1925, holds considerable historical value for our community. Despite its absence from formal recognition on historic registers, its cultural significance is apparent. The proposed modern buildings, with increased height and flat roofs, pose a potential threat to the unique aesthetic of the Heritage building, possibly undermining its historical importance. I advocate for a thorough exploration of alternatives, such as reducing the project's size, incorporating sloped roofs, lowering the overall height, and carefully siting new additions to mitigate any adverse effects.

Additionally, the project's excessive height, including elevator and utility penthouses exceeding 50 feet, raises concerns about shadowing. Our neighborhood prides itself on vibrant parks and recreational areas, and the proposed height could cast significant shadows, diminishing the accessibility and sunlight that define these spaces. A detailed evaluation and addressing of this potential shadowing issue are crucial to preserving our community's enjoyment of these open areas.

The extensive excavation, particularly in an Air Pollutant Exposure Zone, necessitates strict adherence to Health Code Article 38 regulations. Excavation activities are likely to generate air pollutants, a matter that demands an Environmental Evaluation Application. Additionally, considering the proximity of a hazardous waste site at 1598 Bay Street, proactive measures must be taken to prevent potential toxin migration. As this excavation represents a substantial alteration to a sensitive-use building, our retirement home, robust mitigation measures throughout the process are imperative.

Parking and traffic concerns remain paramount. The addition of 38 new parking spaces and a new curb exacerbates existing challenges in our transportation infrastructure. A comprehensive evaluation of the project's impact on parking availability, traffic flow, and neighborhood safety is essential. Collaborative efforts to identify effective mitigation measures are crucial to prevent undue burdens on our community.

The potential loss of open space and landscaping is disheartening. Our neighborhood currently

enjoys beautiful trees and meticulously maintained landscaping, contributing to our street's aesthetics. The proposed elimination of these natural elements in favor of a stark facade is concerning. Additionally, the addition of nearly 60,000 square feet of new building space seems disproportionate and out of harmony with the neighborhood. Careful consideration, with a cautious approach to seeking variances or exceptions, is vital to preserve essential open space and maintain our community's character.

Lastly, the variances, waivers, and exceptions sought by the project should be scrutinized closely. Further deviations from the norms of our 100% residential neighborhood risk exacerbating discordance. Upholding existing code and preserving the integrity of our neighborhood should take precedence over further nonconforming use.

I strongly urge the Planning Department to conduct a comprehensive environmental review of the proposed construction at 3400 Laguna Street in accordance with CEQA guidelines. The concerns outlined, spanning the potential adverse impact on the historic resource, shadowing of parks, excavation-related air pollution and hazardous waste risks, parking and traffic burdens, loss of open space and landscaping, and conformity with code requirements, underscore the need for a meticulous evaluation.

Thank you for your dedicated consideration of these matters. I trust in your commitment to conducting a thorough assessment of the environmental impacts associated with this project and making informed decisions that prioritize the well-being of our community.

Warm regards,

Todd Polidore

Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Ave, Suite 1400
San Francisco, CA: 94103

December 14 2023

Re: 3400 Laguna St, Heritage on the Marina

Dear Ms Poling

We understand that your department has received a letter dated November 30, 2023, from a resident at the Heritage on the Marina in San Francisco in regard to the Environmental Impact Report applied for by the management of the Heritage on the Marina.

However, there is no indication that this letter was actually written by a resident living at the Heritage on the Marina. The letter was not signed nor was there any indication of the apartment number that the letter writer occupied. The letter could just as easily have been written by someone living outside of the community of the Heritage on the Marina.

On behalf of the Residents' Council of the Heritage on the Marina we would like to go on record as giving our support for the Environmental Impact report as outlined by management of the Heritage on the Marina.

We all realize that remodeling and construction is never easy for anyone living in or near a construction project. However, management of the Heritage on the Marina has assured us that they plan to mitigate these problems as much as possible with possible alternative accommodations and other factors.
We are therefore going on record as fully supporting the management of the Heritage on the Marina in their application for a favorable outcome for their Environmental Application Report as being the best for all concerned in the long run.

Patrick Alexander
President, Residents' Council.
Telephone – 415-567-0419
Email baimp @earthlink.net

Rod Dugliss,
Vice President, Residents' Council
Telephone – 415-596-9504
Email rdugliss@gmail.com

Theo Armour
Secretary, Residents' Council
Telephone 415-828-0000
Email t.armour@gmail.com

Kathy Kirkpatrick
Treasurer, Residents' Council
Telephone 415-509-4445
Email kkirkpatrick1346@gmail.com

Residents' Council, Heritage
3400 Laguna St
San Francisco, CA 94123, USA

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Jeanie Poling
Senior Environmental Planner
San Francisco Planning
49 South Van Ness Ave, Suite 1400
San Francisco, CA: 94103

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From: Rosas, Lorenzo (BOS)
To: Poling, Jeanie (CPC); StefaniStaff, (BOS)
Cc: Wietgrefe, Wade (CPC)
Subject: RE: 3400 Laguna Street
Date: Thursday, November 2, 2023 1:09:22 PM

Hi Jeanie,

Thank you for letting me know. I don't have any questions currently. As I understand it, this is the notice that an EIR will be conducted. We have also been contacted by the project sponsors, so we will ask them for updates on the project.

Let me know if you have any questions for our office.

Thank you for your work!

Best,
Lorenzo Rosas | Legislative Aide
Office of Supervisor Catherine Stefani
San Francisco Board of Supervisors, District 2
City Hall, Room 273
(415) 554-7752
www.sfbos.org/Stefani

From: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Sent: Thursday, November 2, 2023 1:05 PM
To: StefaniStaff, (BOS) <stefanistaff@sfgov.org>; Rosas, Lorenzo (BOS) <Lorenzo.Rosas@sfgov.org>
Cc: Wietgrefe, Wade (CPC) <wade.wietgrefe@sfgov.org>
Subject: RE: 3400 Laguna Street

Hello Mick and Lorenzo,

Please let Wade and me know if you have any questions about the environmental review for this project.

Kind regards,
Jeanie

Jeanie Poling, Senior Environmental Planner
Environmental Planning
San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7559 | https://sfplanning.org/
https://sfplanningis.org/pim/

From: StefaniStaff, (BOS) <stefanistaff@sfgov.org>

Sent: Thursday, November 2, 2023 12:25 PM
To: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Cc: Rosas, Lorenzo (BOS) <Lorenzo.Rosas@sfgov.org>
Subject: RE: 3400 Laguna Street

(+Lorenzo)

Hello Jeanie,

Thank you for sending this over! I'm looping in my colleague, Lorenzo Rosas, who staffs the Supervisor on Land Use matters.

Regards,

Mick Del Rosario | Legislative Aide
Office of Supervisor Catherine Stefani
San Francisco Board of Supervisors, District 2
City Hall, Room 273
(415) 554-7752
www.sfbos.org/Stefani

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From: Poling, Jeanie (CPC) <jeanie.poling@sfgov.org>
Sent: Wednesday, November 1, 2023 1:19 PM
To: StefaniStaff, (BOS) <stefanistaff@sfgov.org>
Subject: 3400 Laguna Street

Hello,

The following documents regarding the proposed project at 3400 Laguna Street in San Francisco were published today.

> Notice of Availability of Notice of Preparation of an EIR
>
> Notice of Preparation of an EIR

Kind regards,

Jeanie Poling, Senior Environmental Planner
Environmental Planning
San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7559 | https://sfplanning.org/
https://sfplanningis.org/pim/

From: Tracie Rosen
To: Poling, Jeanie (CPC)
Subject: Case No. 2022-009819ENV Project Address: 3400 Laguna Street
Date: Saturday, December 2, 2023 10:12:08 AM

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Jeanie Poling
San Francisco Planning
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94108
jeanie.poling@sfgov.org

November 27, 2023

Re: Case No. 2022-009819ENV
Project Address: 3400 Laguna Street

Dear Ms. Poling,

I am writing to express my deep concern and opposition to the proposed building development at 3400 Laguna Street, also known as the Heritage on the Marina (the "Heritage"), which is slated to be add nearly 60,000 square feet in size and is intended to accommodate only 23 new residential units.

While I appreciate the need for urban development, I must voice my environmental concerns regarding this project, which I believe could have significant adverse effects on our community. These concerns encompass various aspects, including but not limited to traffic congestion, noise pollution, and the potential overshadowing of an existing architectural gem designed by Julia Morgan.

1. **Traffic Congestion**: Introduction of this amount of construction in our neighborhood raises apprehensions about increased traffic congestion. The current infrastructure may struggle to accommodate the influx of residents and vehicles, leading to disruptions in our daily lives and potential safety hazards. I am particularly concerned about both the impact of construction-related parking/congestion over the multi-year building timeline and the long-term impact of both reduced street parking as the Heritage intends to take away public space for its driveway and private bicycle parking as well as the burden on increased traffic and parking problems from the increase in employees, visitors and residents.

2. **Noise Pollution**: The construction and subsequent habitation of buildings of this scale will undoubtedly contribute to elevated noise levels in the area. This poses a considerable inconvenience to existing residents and could have adverse effects on their overall well-being. I am particularly outraged that the construction is intended to last for years and that it will be undertaken from 8 am to 7 pm. This is a quiet, residential community full of children, retirees, students and folks working from home. The Heritage provides housing for frail, elderly people. This is not a neighborhood or a population that should have to live with and next to a massive, almost industrial-sized construction project.

3. **Air Quality and Pollution**: The construction process and increased human activity associated with the new development may result in heightened air pollution, impacting the environmental quality of our community. I am also concerned about the impact of the proposed significant excavation that the Heritage wants to do as this has the potential for disturbing the stability of surrounding buildings. These are matters of great concern for those of us who value the health of our surroundings.

4. **"Burying" the Julia Morgan Mansion**: One of the most distressing aspects of this proposed development is the potential obscuring of an existing beautiful building designed by Julia Morgan. Her architectural contributions are integral to the character of our neighborhood, and the overshadowing of such an iconic structure would be a disheartening loss for our community. The Heritage's current plans basically encapsulate the mansion on three sides by contemporary 4-story buildings, which are not only higher than the mansion but also completely clashing in style.

I implore you to reconsider the scale and scope of the proposed development, taking into account the environmental and cultural implications it may have on our community. Collaborative efforts that prioritize sustainability, community engagement, and the preservation of our architectural heritage can pave the way for a more harmonious and mutually beneficial development.

Thank you for your time and consideration. I look forward to a thoughtful reassessment of the project that aligns with the values and well-being of our community.

Sincerely,

Tracie Rosen

TMR

From: Jay Stilwell
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna - CEQA Concerns
Date: Sunday, November 26, 2023 12:21:55 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

In response to the CEQA/EIR notice I would like to voice my concern that the proposed building is certainly not worth the impact on the environment.

The City needs to build housing for ordinary people, not the ultra-rich! Why would a tax-exempt entity be allowed to build over 58,000 square feet for the benefit of 23 wealthy people? We need to spend City resources to affordably house the elderly and families. 58,000 square feet is an obscene amount of space for a handful of people and by definition this is bad for the environment. The construction phase is horrible for the environment – cement trucks idling for hours, pollution spewing trucks driving next to parks and playgrounds, massive digging creates dust, traffic, noise etc… for years! They say 2.5 years but probably much longer. The CO2 emissions alone from 58,000 square feet of building will eventually create tons of waste that will unnecessarily add to climate rise. And the materials used will leave a huge carbon footprint – Aluminum, Cement and Steel are some of the worst offenders. All for 23 wealthy people that can afford any retirement center in the Bay Area or the country for that matter. And if you think about it, the Heritage will probably spend over $40 million to add these 23 units, given this cost, all the amenities and common space, I cannot imagine what they need to charge residents to rationalize this investment. As a non-profit, and non-tax payer, they should be investing in the community, not just serving the ultra-wealthy. I think the founding SF Ladies Protection and Relief Society would be ashamed of its current mission!

Sincerely,

Jay Stilwell

VerPlanck
HISTORIC PRESERVATION CONSULTING
530 Rockdale Drive
San Francisco, CA 94127



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Ms. Jeanie Poling, EIR Coordinator
San Francisco Planning Department
49 So. Van Ness Avenue, Ste. 1400
San Francisco, CA 94103

VerPlanck
HISTORIC PRESERVATION CONSULTING

Technical Memorandum: 3400 Laguna Street

To: Ms. Jeanie Poling, EIR Coordinator
San Francisco Planning Department
49 So. Van Ness Avenue, Suite 1400
San Francisco, CA 94103

From: Christopher VerPlanck, Principal
VerPlanck Historic Preservation Consulting
530 Rockdale Drive
San Francisco, CA 94127

CC: Stephen Williams; Jeffrey Horn

Date: 30 November 2023

Re: Comments on Notice of Preparation of Environmental Impact Report for 3400 Laguna Street (Case No. 2022-009819ENV)

Dear Jeanie,

My firm was retained by the Law Office of Stephen Williams to provide an opinion on Heritage on the Marina's proposed expansion of its Marina District campus at 3400 Laguna Street (APN 0471/003). I prepared this Technical Memorandum in response to Mr. William's request for a professional opinion regarding the project's potential impacts to the historic 1925 retirement home, which was designed by architect Julia Morgan. Although this building has no formal historical status at the local, state, or national level, the San Francisco Planning Department concurs with Page & Turnbull's February 16, 2023 Historic Resource Evaluation (HRE) Part 1 that finds the Morgan Building –as it is commonly known – to be a historical resource per the California Environmental Quality Act (CEQA). Given that, it is surprising that neither the Planning Department nor the project sponsor's team appears to have prepared an analysis of the proposed project for compliance with the Secretary of the Interior's Standards. Due to the apparent lack of such an analysis, this Technical Memorandum provides one in the pages below. In summary, it can be demonstrated that the proposed project does not comply with all 10 of the Standards – specifically Rehabilitation Standards 2, 9, and 10, which deal with additions and related new construction. As a project that does not comply with the Standards, it does not benefit from a regulatory presumption under CEQA that it would *not* have a significant adverse change on the resource. In particular, the overall size of the proposed new buildings will overwhelm the historic Morgan Building, which will be relegated to subsidiary status after the main entrance is relocated to the proposed new building facing Bay Street. Bafflingly, the project sponsor has provided very little information – almost none – in regard to what physical treatments the Morgan Building would undergo as part of this "repositioning." Finally, I believe that a project of this size and scope deserves a closer look at several other areas that are not proposed for

study in the Notice of Preparation of the Environmental Impact Report, in particular Transportation and Circulation, Noise, Shadow, Geology and Soils, and Hydrology and Water Quality.

Qualifications

I am a San Francisco-based architectural historian and historic preservation consultant. I hold an M.Arch.H., as well as a Certificate in Historic Preservation, from University of Virginia's Graduate School of Architecture. While attending UVA I interned as an architectural conservator at Monticello, where I personally restored the historic wood-sash windows in Thomas Jefferson's bedroom. Upon graduating from UVA, the Society of Architectural Historians awarded me its highest honor – the Sally Kress Tompkins Fellowship. This allowed me to intern at the Historic American Engineering Record (HAER) in Washington, D.C., where I completed measured drawings of several textile mill villages in Georgia and Alabama's Chattahoochee River Valley. In November 1997, I returned to the Bay Area to take a job at The Foundation for San Francisco's Architectural Heritage (now San Francisco Heritage). In 1999, I began working at Page & Turnbull, where I founded the Cultural Resources Studio. Since 2007 I have served as an independent historic preservation consultant. I meet the Secretary of the Interior's Professional Qualifications for architectural history and history. Finally, I have received several design awards, including from the California Preservation Foundation, San Francisco Beautiful, and the American Institute of Architects – Northern California Chapter.

As a freelance architectural historian/preservation consultant I have completed hundreds of historic resource evaluations, historic structure reports, National Register nominations, cultural resource surveys, and CEQA analyses in San Francisco. I am a locally recognized expert on the Marina District, having published a multi-part scholarly article on the neighborhood's history and architectural heritage in *Heritage News* in 2007.

Methodology

I visited 3400 Laguna Street on November 28, 2023. Prior to visiting the site I reviewed all of the background documents posted on the Planning Information Map (PIM), as well as several other documents provided by Mr. Williams. I have also reviewed publicly available drawings and publicity materials prepared by HKS architects, Page & Turnbull, and other consultants hired by Heritage on the Marina. Finally, I completed some research of my own into the history of the property, including reviewing Sanborn maps, historical newspaper databases, and contemporary building journals.

Regulatory Background

As mentioned, 3400 Laguna Street is not registered in any historic resource inventories at the local, state, or national level. In spite of its clear architectural and historical significance it is not a local city landmark. Nor is it listed in the California Register of Historical Resources (California Register) or the National Register of Historic Places (National Register). However, in 2017, Planning Department staff changed the property's status from Category B – "Unknown Age-eligible," to Category A – "Historic Resource Present." This change was evidently made in response to an earlier project application by the project sponsor.[1] The HRE prepared for this project found the property eligible for the California Register under Criterion 1 (Events) and Criterion 3 (Design/Construction), with a period of significance of 1925 to 1957.[2]

As the lead agency, the San Francisco Planning Department is responsible for determining whether the proposed project has the potential to have a significant adverse impact on the historic Morgan Building (and the associated landscaping and the Caretaker's Cottage) at 3400 Laguna Street. According to the Preliminary Project Assessment (PPA) prepared by the Planning Department in December 2022, the proposed project would require both the HRE Parts 1 and Part 2. In response, the project sponsor's historic preservation consultant, Page & Turnbull, revised its seven-year-old HRE Part 1, issuing the

[1] Property listing for 3400 Laguna Street, San Francisco Property Information Map: https://sfplanninggis.org/pim/, accessed November 22, 2023.
[2] Page & Turnbull, *3400 Laguna Street Historic Resource Evaluation Part 1 – Revised* (San Francisco: February 16, 2023).

revised report on February 16, 2023. This HRE confirmed the previous 2016 findings that 3400 Laguna Street appears eligible for the California Register under Criteria 1 and 3.

However, it does not appear that an HRE Part 2 has ever been prepared or published by the Planning Department because it is not posted on the PIM and has not been made available through other means. Assuming that an HRE Part 2 had been prepared but not published, I contacted the Planning Department to see if I could get a copy. Unfortunately, I have received no response to my inquiry. According to the December 2022 PPA:

> If required, the department will determine whether a consultant prepared HRE part 2 report is necessary. If a consultant report is necessary, it must be prepared by a qualified consultant selected from the department's historic resource consultant pool.[3]

Given the scale of the project and the sensitivity of the site, it seems unquestioned that an HRE Part 2 should be prepared. Such a document is critical to evaluate the potential impacts of the proposed project – chiefly because it will include an analysis of the project for compliance with the Secretary of the Interior's Standards for Rehabilitation (Standards). As mentioned, a project that complies with all 10 Standards benefits from a regulatory presumption under CEQA that it will not have a significant adverse impact on the resource.[4] In most cases, if a project meets the Secretary of the Interior's Standards for the Treatment of Historic Properties it can be considered categorically exempt from CEQA (14 CCR Section 15331).

Concise History of Heritage on the Marina

The organization that manages Heritage on the Marina is known as the San Francisco Ladies Protection and Relief Society. Founded in 1853 during the Gold Rush, the society was established to care for destitute women and children abandoned by their husbands. Originally located in the South of Market area, in 1860, the Society acquired an entire block bounded by Van Ness Avenue, Post Street, Franklin Street, and Geary Boulevard and built a residential facility for homeless young women and their children, as well as an industrial school.[5] Sixty three years later, the organization acquired most of the undeveloped block bounded by Bay, Octavia, Francisco, and Laguna streets in the Marina District. This site, which had previously been part of the 1915 Panama Pacific International Exposition, was chosen due to its proximity to Lobos Square (now the Moscone Recreation Center) and San Francisco Bay.[6] The society hired famed architect Julia Morgan to design a Jacobethan-style building that contained residential quarters for convalescent women and their children, as well as separate quarters for retired women. The fees were kept low enough so that most people could afford care at the home, and no one was turned away if they needed assistance.[7] Completed in 1925, the three-story, red brick building originally anchored a half-acre of formal gardens laid out with the assistance of Golden Gate Park superintendent John McLaren.[8]

The San Francisco Ladies Protection and Relief Society ran the home in this new location for 32 years with no changes. In 1955, the board of directors decided to convert the facility into a retirement home exclusively for elderly San Franciscans, including both men and women. In so doing it merged with the Crocker Old People's Home. The organization then hired architect Warren C. Perry – husband of board chair Joy Perry – to design a new residential building at the rear (east side) of the property to accommodate the residents from the Crocker Old People's Home. Originally only permitted for three stories, the society successfully applied to add a fourth story in 1957. Completed in 1958, this utilitarian concrete building –known today as the Perry Building – is attached to the back of the Morgan Building by a two-story linking wing called the Perry Building Connector. In 1959, the expanded retirement facility, which was renamed "The Heritage," could accommodate 100 residents in private rooms spread across both buildings. Four years later, the society constructed the one-story Health Care Center – designed by

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[3] San Francisco Planning Department, "Preliminary Project Assessment" for 3400 Laguna Street (December 2022), Appendix B3.
[4] California Office of Historic Preservation: https://ohp.parks.ca.gov/?page_id=21727, accessed November 28, 2023.
[5] Page & Turnbull, *3400 Laguna Street Historic Resource Evaluation Part 1 – Revised* (San Francisco: February 16, 2023).
[6] "Buyers' Identity becomes Known," *San Francisco Chronicle* (March 25, 1922), 11.
[7] "Aid Society in New Home," *San Francisco Chronicle* (May 15, 1925), 13.
[8] "New Home will be Opened by Old Society," *San Francisco Chronicle* (May 10, 1925), 55.

famed modernist architect Gardner Dailey – along Francisco Street. This addition was completed in 1963. Both the 1958 and 1963 additions were subject to conditional use authorizations, evidently because the facility is located on a residential block zoned for low-density uses.

Since 1963 The Heritage (later renamed Heritage on the Marina) has operated as a retirement home and skilled nursing facility. However, in recent years the management has been working to upgrade the facility in pursuit of a higher-paying clientele, combining many of the single rooms into suites and adding amenities such as classrooms, a beauty salon, and private gathering spaces. Due to these changes, the number of units has actually declined over the years, dropping from 100 in 1958 to 86 today. The cost of acquiring a spot at the home has consequently spiraled, with prospective residents required to pay a substantial "entrance fee," as well as monthly service fees. Presently, Heritage on the Marina is one of the most expensive retirement communities in the city. The proposed project appears to be largely geared toward maximizing the number of units on the campus as the institution completes its transition from a more modest skilled nursing facility into a deluxe at-home care facility.

Project Description

Heritage on the Marina's (Heritage) proposed "Repositioning" Project will transform the 98-year-old property from a retirement home with a substantial skilled senior nursing facility into a high-end "at-home care facility" for independent living.[9] The project will result in the demolition of the 1963 Health Care Center and the 1957 Perry Building Connector to make way for two new four-story buildings known respectively as the "Bay Building" and the "Francisco Building." Over 15,000 square feet of soil will be excavated from beneath the center of the campus to construct a subterranean parking garage, which will increase on-site parking from 17 to 36 vehicles. The new buildings will increase the residential capacity of the site from 86 to 109 units – an increase of only 23 – but it will almost double the square footage, which will increase from 83,000 to 142,000 sf. The two new buildings will rise to the maximum height limit of 40', although the elevator overrides and stair penthouses will rise to almost 50'. The Bay Building will be attached to the Morgan Building up to the second-floor level. Above this there will be a 10'-wide gap to the parapet. The Francisco Building will not touch the Morgan Building above-grade, but it will be set back from it by only about 10'. The former Caretaker's Cottage at the northeast corner of the site will be retained and converted into a residential unit.

The proposed project will result in the destruction of much of the remaining landscaping, including the Central Courtyard and most of the lawns, hedges, and trees along both Bay and Francisco streets. The existing Front Garden along Laguna Street will remain, as well as the Rear Courtyard, which is located behind the Perry Building at the center of the block.

To date it does not appear that the project sponsor has released any detailed architectural drawings showing the exteriors of the proposed new buildings. So far it appears that the project sponsor's architect, HKS, has only released basic site plans, simple massing diagrams, and rudimentary sections. It is not known if the lack of visual materials is due to the project sponsor fearing what people might conclude, but even what has been provided shows a drastically expanded building plant that will occupy a much larger portion of the site – both in area and in three dimensions – than what exists today.

As mentioned, the Bay Building will replace the existing two-story connector wing that links the Perry Building to the Morgan Building. It will contain the relocated main entrance as befitting the new building's position as the administrative hub of the "repositioned" campus. In addition, the Bay Building will contain a new dining room, a large industrial kitchen, and living quarters. In front of the new entrance will be a large driveway/drop off zone sheltered beneath a cantilevered wing. A pair of auto ramps to the left will provide access to the new subterranean parking garage beneath the center of the campus. To the left of the ramps will be a new loading dock/shipping and receiving area. The central part of the Bay Building will cantilever out over the pedestrian and auto entrances, creating a bulky new volume that will extend well past the Perry Building toward Bay Street. Extensive curb cuts will be required to accommodate vehicular circulation. On the other side, the Bay Building will extend into what is now the Central Courtyard,

[9] The Health Care Center has already closed.

significantly reducing the amount of ground-level open space. As mentioned, the Bay Building will be 40' high, with an elevator override that rises to 50'.

The four-story Francisco Building will replace the one-story Health Care Center at the south side of the property. It will be physically attached to the Perry Building at its east end and it will be functionally related to it, containing mainly residential units. The Francisco Building will be massed similar to the Perry Building, with a rectangular footprint and a flat roof – although the left (west) side will be configured so that it is set back from the Morgan Building by approximately 10'. Similar to the Bay Building, the Francisco Building will be 40' high with a 50'-high elevator override.

A handful of project renderings released by the project sponsor show the street-facing elevations of the proposed Bay and Francisco buildings broken down into discrete sections that are cloaked in Disneyesque cladding and ornament that allegedly represents various traditional architectural styles seen in this part of the city. Nonetheless, the detailing appears to be simply applied to the box-like buildings in a two-dimensional, surface treatment similar to a postage stamp – it does not seem to be a realistic attempt to diminish the apparent size of the buildings.

As mentioned, the proposed project will shift the main entrance of Heritage on the Marina from the Morgan Building on Laguna Street to the proposed new Bay Building. At this time it is not known if any physical impacts would result from the relocation of the primary entrance, but it will certainly change the spatial organization of the campus, reorienting it away from Laguna Street and the Moscone Recreation Center toward Bay Street and Fort Mason. In addition to relegating the Morgan Building to a position of lesser importance, it will reorient the campus from an east-west alignment toward an ahistorical north-south axis. In fact, this seems to be a deliberate attempt to make Francisco Street the "rear" of the campus. The purpose of this could be to avoid complying with mandatory setbacks, as well as justifying the construction of a much larger building on the site of the Health Care Center, which appears to have been limited to one story in a conditional use authorization (CU) issued in 1962.

The following sections analyze the proposed project for compliance with the Secretary of the Interior's Standards. Due to the fact that so little is known about the proposed physical treatment of the Morgan Building itself, this analysis is unable to provide any substantive commentary under several of the individual Standards. Project materials describe the treatment of the Morgan Building as "purely restorative," but it is not known what this means. Furthermore, there should be description and analysis of the relocation of the main entrance to Bay Street, as well as the potential impacts of conducting extensive excavation right next to the Morgan Building's foundation. Due to the lack of information in project drawings and ancillary materials, this analysis centers on potential visual impacts stemming from the massing of the proposed new buildings. And because the project site is located across the street from the National Register-listed Fort Mason Historic District and the California Register-eligible Moscone Recreation Center, potential visual impacts on these districts are considered as well.

Analysis of the Project for Compliance with the Secretary of the Interior's Standards

In the following sections, we analyze the proposed project for compliance with the Secretary of the Interior's Standards for Rehabilitation. The *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings* (the Rehabilitation Standards and the Guidelines, respectively) provide guidance for reviewing work to historic properties.[10] Developed by the National Park

[10] U.S. Department of Interior National Park Service Cultural Resources, Preservation Assistance Division, *Secretary of the Interior's Standards for Rehabilitation and Illustrated Guidelines for Rehabilitating Historic Buildings, 1992*. The *Standards*, revised in 1992, were codified as 36 CFR Part 68.3 in the July 12, 1995 Federal Register (Vol. 60, No. 133). The revision replaces the 1978 and 1983 versions of 36 CFR 68 entitled *The Secretary of the Interior's Standards for Historic Preservation Projects*. The 36 CFR 68.3 *Standards* are applied to all grant-in-aid development projects assisted through the National Historic Preservation Fund. Another set of *Standards*, 36 CFR 67.7, focuses on "certified historic structures" as defined by the IRS Code of 1986. *The Standards* in 36 CFR 67.7 are used primarily when property owners are seeking certification for federal tax benefits. The two sets of *Standards* vary slightly, but the differences are primarily technical and non-substantive in nature. The *Guidelines*, however, are *not* codified in the Federal Register.

Service for reviewing certified rehabilitation tax credit projects, local governmental bodies across the country have adopted the Standards to review work to historic properties. The Rehabilitation Standards provide a useful analytical tool for understanding and describing potential changes to historical resources, including new construction inside or adjoining historic districts.

Conformance with the Rehabilitation Standards does not determine whether a project would cause a substantial adverse change in the significance of a historical resource under CEQA. Rather, projects that comply with the Standards benefit from a regulatory presumption that they would have a less-than-significant adverse impact on a historical resource.[11] Projects that do not comply with the Rehabilitation Standards may or may not cause a substantial adverse change in the significance of an historical resource and would therefore require further analysis by the San Francisco Planning Department to determine whether the historical resource would be "materially impaired" by the project under *CEQA Guidelines* 15064.5(b).

Rehabilitation is the *only* one of the four treatments in the Standards (the others are Preservation, Restoration, and Reconstruction) that allows for the construction of an addition or other alteration to accommodate a change in use.[12]

The first step in analyzing a project's compliance with the Rehabilitation Standards is to identify the resource's character-defining features, including characteristics such as design, materials, detailing, and spatial relationships. Once the property's character-defining features have been identified, it is essential to devise an approach that protects and maintains these important materials and features – meaning that the work involves the "least degree of intervention" and that important features and materials are safeguarded throughout the duration of construction.[13] It is critical to ensure that the new work does not result in the permanent removal, destruction, or radical alteration of any significant character-defining features. According to Page & Turnbull's HRE Part 1, the character-defining features of the Morgan Building include the following:

- Overall regular massing and intersecting hipped roof;
- U-shaped plan, consisting of central volume, north and south wings at east façade, and projections at north and south façades;
- Structural brick exterior walls;
- Slate roof shingles;
- Symmetrical arrangement of front façade, with central gabled parapet;
- Historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows;
- Projecting canted bays;
- Hipped dormer windows at roof;
- Operable, divided-lite windows retaining historic configurations;
- Terra cotta details: window surrounds with vegetative motifs in segmental arches; decorative panels and entablatures at canted bays; belt courses above second level windows; projecting cornice with buttons at eave; coping and finial at central gabled parapet; double arched door surround at primary entrance vestibule;
- Arched ground-level door openings at ground level;
- Stained glass windows at interior chapel
- Additional historic design features: narrow blind niche and recessed diamond and square details in brick;
- Historic glazed doors within entrance vestibule;
- Three brick chimneys;
- Front double stairs with iron railing;
- Towers and penthouse at east façade;

[11] CEQA Guidelines subsection 15064.5(b) (3).
[12] Ibid. 63.
[13] Ibid.

- Rain catch baskets;
- Historic features in publicly accessible interior areas include:
    - Tile floor;
    - Central stairwell with trefoil railing;
    - Fireplace mantel;
    - Wood coffered ceiling.

In addition to the Morgan Building, Page & Turnbull correctly identifies the "front lawn" and the Caretaker's Cottage to be historic features of the campus. Appropriately, the list of character-defining features does not include the Perry Building, the Health Care Center, the Central Courtyard, the Rear Courtyard, or any other landscaping on the property.

The following section evaluates the proposed project for compliance with the Secretary of the Interior's Standards for Rehabilitation. As noted below, compliance with several Standards is not known because there is not enough information to make an accurate determination.

Rehabilitation Standard 1: *A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

The proposed project complies with Rehabilitation Standard 1 because the facility will continue to function as a retirement home.

Rehabilitation Standard 2: *The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize the property will be avoided.*

The proposed project does not comply with Rehabilitation Standard 2. The project calls for the construction of two new four-story buildings right next to the Morgan Building, which will greatly change the spatial relationships that characterize the property today. Originally built on a site consisting of almost a half-acre of gardens, over time most of the landscaping was lost to new buildings, including the Perry Building in 1957, the Health Care Center in 1963, and two smaller additions built in 1988. Although quite impactful given the loss of the original landscaping, the siting of these buildings was done in such a way that they do not impinge upon the historic Morgan Building – especially when viewed from Laguna Street. Although not especially attractive, the design of these two buildings is very simple and modest. This, combined with their brick-colored stucco and judicious placement of landscaping, renders them relatively inoffensive, allowing the Morgan Building to stand out like a jewel in a seemingly pristine landscaped setting. In contrast, the proposed new four-story buildings will be built right up to the edges of the Morgan Building and they will be much larger in regard to both footprint and volume. They will also be quite visible from Laguna Street, as well as the Moscone Recreation Center and Fort Mason. The proposed new buildings will inappropriately "bookend" the Morgan Building – diminishing its prominence on the site and putting it into shade between two much larger buildings. Although the design of the new buildings does not appear to be finalized, what renderings have been published illustrate a very busy and complicated design that will visually compete with the Morgan Building.

In regard to the Caretaker's Cottage, the proposed project will convert it into a single-unit dwelling. Although not much detail is provided in project drawings on how the exterior will be treated, it appears that the cottage and its immediate context will undergo few changes.

In regard to the landscaping, the original gardens installed when the Morgan Building was built are mostly gone – eliminated by the construction of the Perry Building and the Health Care Center, as well as the incremental "modernization" of the Central Courtyard and the Rear Courtyard. The proposed project will leave the Front Garden – which is largely original – essentially unchanged. It will also not change the Rear Courtyard. The rest of the landscaping, including most of the lawn panels and trees along Bay Street, and the hedge along Francisco Street, will all be removed and/or reconfigured.

Rehabilitation Standard 3: *Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

The proposed project complies with Rehabilitation Standard 3 in that no conjectural features or elements from other historic properties will be added to either the site or to the Morgan Building.

Rehabilitation Standard 4: *Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

The proposed project complies with Rehabilitation Standard 4. According to Page & Turnbull's HRE Part 1, the period of significance for the Morgan Building is 1925 to 1957, so no later changes to the property have gained significance in their own right, including the Perry Building, the Health Care Center, or the two smaller 1980s-era additions. As discussed, the project will only demolish buildings constructed after the end of the period of significance, including the Perry Building Connector and the Health Care Center – neither of which has gained significance in its own right.

Rehabilitation Standard 5: *Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

At this time it is not known whether the proposed project would comply with Rehabilitation Standard 5 because the project sponsor has not provided any information on what specific treatments will be performed on the Morgan Building.

Rehabilitation Standard 6: *Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

At this time it is not known whether the proposed project would comply with Rehabilitation Standard 6 because the project sponsor has not provided any information on what specific treatments will be performed on the Morgan Building.

Rehabilitation Standard 7: *Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*

At this time it is not known whether the proposed project would comply with Rehabilitation Standard 7 because the project sponsor has not provided any information on what specific treatments will be performed on the Morgan Building.

Rehabilitation Standard 8: *Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

At this time it is not known whether the proposed project would comply with Rehabilitation Standard 8. What is known is that it will require the excavation of at least 15,000 square feet of soil in what the Planning Department's Preliminary Project Assessment (PPA) describes as an "archaeologically sensitive area." According to the PPA, Planning staff will conduct a "preliminary archeological review," but it is not known if this has been completed, and if it has, what conclusions have been reached.

Rehabilitation Standard 9: *New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

The proposed project does not comply with Rehabilitation Standard 9. As described in previous sections, the project would result in the replacement of the two-story Perry Building Connector with the four-story Bay Building, and the one-story Health Care Center with the four-story Francisco Building. Both buildings will occupy larger footprints than the buildings that they will replace and both will rise to 40' – the maximum height limit for this area. Furthermore, the elevator overrides and stair penthouses will bring the highest parts of the new buildings up to 50'. In contrast, the Morgan Building is only three stories high. In terms of usable square footage, the proposed project would increase the site's capacity from 83,197 sf to 141,579 sf, an increase of 41 percent. Although the project sponsor has not provided detailed drawings showing what the new additions will look like, it is very clear that their exteriors will both be eminently visible from the surrounding streets and parks, including the National Register-listed Fort Mason Historic District and the California Register-eligible Moscone Recreation Center. What is now a fairly open composition with lots of breathing room around the Morgan Building will be converted into an intensely urban environment with much larger buildings hemming in the Morgan Building from three sides and eliminating most ground-level open space.

Finally, there is not enough information on the exterior cladding materials, fenestration patterns, and architectural styling to comment on the new buildings' compatibility with the Morgan Building or the surrounding neighborhood. However, what renderings have been published indicate that the street-facing façades of both buildings will be exceedingly "busy" and complicated, with a variety of pseudo-historical façade treatments applied to their box-like exteriors in order to "blend in" with the varied residential character of the Marina District. However, it seems that the aesthetic treatment proposed is little more than applying "lipstick to the pig." A more detailed study should be made of the surrounding blockfaces in order to come up with a design that is more compatible with the character of the surrounding buildings.

Rehabilitation Standard 10: *New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

The proposed project does not comply with Rehabilitation Standard 10. Although the Bay and Francisco buildings could be demolished in the future, the site will have been so radically changed through extensive excavation and open space removal that it would be exceedingly difficult to restore the essential form and integrity of the property.

Conclusion

Altogether, the proposed project complies with Standards 1, 3, and 4. It does not comply with Standards 2, 9, or 10. Currently there is not enough information to determine if the project would comply with Standards 5, 6, 7, or 8. While it is possible that the project could end up complying with the majority of the Standards, failure to comply with Standards 2, 9, and 10 is significant and almost certainly a "deal breaker" from the perspective of CEQA because these three standards are all concerned with the construction of additions and related new construction. As a project that does not comply with all 10 of the Standards, it does *not* benefit from a regulatory presumption that it would *not* have a significant adverse effect on the environment. Furthermore, in my opinion, the project would likely have a significant adverse effect on the resource and a significant adverse impact on the environment. Finally, I believe that a project of this size and scope deserves a closer look at several other areas that are not proposed for study in the Notice of Preparation of the Environmental Impact Report, in particular Transportation and Circulation, Noise, Shadow, Geology and Soils, and Hydrology and Water Quality.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Christopher VerPlanck

From: Mia Walker
To: Poling, Jeanie (CPC)
Subject: 3400 Laguna St environmental and historical impact -comments
Date: Monday, November 20, 2023 8:39:51 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling,

Anytime nearly 60,000 square feet are built the impact on the environment is tremendous. The digging, the dust, the diesel trucks idling are all horrendous for the environment. The permanent environmental impact of such a large building is also a worry. Will this project be required to maintain a LEED Zero certification? I think it should since it will be built from scratch and since it is 501c3 supported by taxpayers.

The other concerning part of this project is the damage it will do to the Julia Morgan building. Although they say they will not alter the building itself, it will alter the setting such as the gardens, also, it will be covering up and therefore diminishing the Julia Morgan building's beauty and importance. The proposal is to surround the Julia Morgan building with giant walls on all sides of the property (2 new ones and there is already a wall on the back of the property).

This is a building that should be on the California and National Register for Historic Buildings, and probably will be. Julia Morgan is one of the greatest architects of her generation, a generation that did not welcome women. Ms. Morgan was an iconic architect and a role model for all women, which makes it even more important to preserve her legacy and one of the best examples of her work.

Regards,

Mia Walker

November 29, 2023

Jeanie Poling
SF Planning Dept.
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

RE: Critical Concerns Regarding Proposed Project at 3400 Laguna Street

Dear Ms. Poling,

I trust this message finds you well. Having received the Notice of Preparation of an EIR for the proposed project at 3400 Laguna Street, I feel compelled to bring forth my concerns. As a dedicated resident of the vibrant Marina neighborhood in San Francisco, I implore the SF Planning Department to thoroughly consider the community's apprehensions and proposed amendments.

The proposed project's sheer magnitude not only disrupts the neighborhood's essence but also raises substantial concerns aligned with CEQA guidelines. Allow me to underscore the key issues:

Transportation: The chosen site, positioned at the intersection of Bay and Laguna, is already grappling with existing traffic and parking challenges. Several essential Muni lines (43, 28, 30) servicing the area would undoubtedly face disruptions. Notably, the crosswalk at the southwest corner (Francisco and Laguna) poses an increased risk to pedestrians with amplified traffic.

Hazards/Hazardous Materials: The project's extensive demolition and excavation plans for 60+-year-old buildings heighten concerns about potential hazardous materials such as asbestos. The site's proximity to a former PG&E location with toxic soil further exacerbates worries about encountering unidentified hazardous materials during excavation.

Noise Pollution + Recreation: With a projected timeline of 6+ years, the proposed project threatens severe disruptions to the surrounding neighborhoods, particularly impacting vital recreational spaces like Moscone Park and Fort Mason. These areas, integral for sports leagues, weekly Farmer's Markets, and social gatherings, stand to bear the brunt of prolonged noise and pollution. Additionally, considering the growing trend of remote work, the project's impact on community members' mental health and economic contributions is a matter of significant concern.

Cultural Resources: The proposed project's considerable impact on the Julia Morgan-designed building, once the primary site for the San Francisco Ladies' Protection and Relief Society, is disconcerting. Visual and structural consequences from the construction of towering buildings

surrounding it, coupled with deep excavation work, pose a tangible threat to the preservation of this invaluable cultural resource.

Having cherished the Marina as my home for over 10 years, I am eager to see it progress in a manner that respects its unique character. While I recognize the importance of development, the current proposal appears disproportionate and at odds with the Marina's distinctive charm.

Thank you for your attention to these concerns. I look forward to gaining further insights into the SF Planning Department's evaluation process.

Sincerely,

Jillian Williams
Marina Resident

From: kwms6@aol.com
To: Poling, Jeanie (CPC)
Subject: Case No. 2022-009819ENV. 3400 Laguna Street, San Francisco
Date: Wednesday, November 29, 2023 10:57:46 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Ms. Poling:

I am writing this letter to list my concerns about the environmental impact that the 3400 Laguna Street project will have if approved. Some of my family has lived in this neighborhood for over 10 years.

Let me start by saying that preparation for expansion of this location has been very secretive for quite some time, and the owners/neighbors were not brought into the real goal and objective of the expansion plan until a meeting in April 2023, well after plans were gelled with the development team. Bottom line, there is little concern for the environment or the neighborhood because the objective is, by their own admission, "**more money"** and they advised us that they "cannot commit to our concerns."

1). The Julia Morgan building, built in 1925, will be desecrated and overwhelmed with more modern buildings, which will tower over and shadow its beauty and historic significance. The flat roof lines will appear inconsistant to the current sloping gables. The Julia Morgan building is part of a great architect's legacy SF's history and should not be allowed to be compromised with the size and height of this project. This is supposed to be a residential zoned area, but these plans for expansion certainly will change that into institutional. The beautiful garden landscape will be compromised as well. Another concern is when 150,000 yds of dirt is excavated, the Julia Morgan Building, along with other surrounding buildings could be compromised with possible sinkhole consequences.

2). Parking
It is already challenging to secure parking for our guests or for those who wish to enjoy the parks in the Marina. With the expansion of the current site, parking will be next to impossible with added visitors. Any new parking spaces and a new curb will add new traffic and congestion to the neighborhood. Loading docs will also have negative impacts as driveways will be blocked or street passage will be challenging.

3). Traffic and congestion
This is a lengthy project--estimated to take 4-6 years for completion. Many projects go far past their estimated timeline and completion goals. This is a real fear and will cause additional stress for owners/neighbors who may have to already tolerate construction according to the original completion date. The additional traffic from construction vehicles and dump trucks will make life unlivable and extremely stressful for the neighborhood for many years! Currently, neighbors must tolerate the existing staff taking smoke breaks and making excessive loud cell phone calls outside of the building. This will only increase with the constant comings and goings of construction workers.

4). Noise
Four-six years of construction will provide constant noise and sleeplessness to the owners/neighbors as well as to the current residents of the facility. Many owners/neighbors work from home, using current meeting technology such as Zoom or Teams and the noise will be a constant disruption to work. The ongoing noise for so many years will be more than a nuisance; it could and will cause mental health issues to those living in the neighborhood. For the current residents, it will provoke indescribable stress.

5). Air Pollution
The excavation is in excess of 29,000 cubic feet. With research, it has been discovered that this site is in an Air Pollutant Exposure Zone and is subject to Health Code Article 38. The Heritage is a sensitive use building and must comply with the Health Code. There is a site nearby at 1598 Bay Street, from which toxins may have migrated. Robust excavation could provoke toxins for the neighborhood, let alone the elderly residents.

6). Height and size of the new structure
The building is near two parks and recreational areas and will overwhelm and shadow both areas. The elevator and utility penthouses will exceed 50 feet in height. Additionally, the height of the proposed wall at effectively 5 stories high will destroy the character of the neighborhood and shadow many of the current buildings/residences, robbing the owners/neighbors of sunlight.

7). Additional housing? Because of the investment into expansion, the units will be very costly, attracting wealthy residents from outside of the City. Only twenty-three new units is not worth the many years of construction and will serve very few. The historical mission for this location was to serve dependent women and children. There is a change in the Heritage's overall strategy, which will not provide for affordable housing, but rather will serve the wealthy.

Please consider these many concerns as you evaluate the environment impact of this massive project. The disruption in the lives of the neighbors/owners will be unbearable. This is not a project that can be completed in a short window of time. And in the end, there will only be 23 new units available. Many stressful years of construction in the neighborhood is torture and is unjust to the quality of life for this beautiful community, and shows little regard for the preservation of treasured architecture and landscaping in San Francisco.

Thank you for your time and consideration.

Kathleen Williams
1549 Francisco St, SF 94123

SMW | LAW OFFICES OF
STEPHEN M. WILLIAMS

1934 Divisadero Street | San Francisco, CA 94115 | TEL: 415.292.3656 | FAX: 415.776.8047 | smw@stevewilliamslaw.com

Jeanie Poling, Senior Environmental Planner
San Francisco Planning Department
1660 Mission Street, Suite 400
San Francisco, CA 94102

December 1, 2023

RE:	**Comments on Proposed Project for Preparation of an Environmental Impact Report**
PROJECT:	**Demolition of Existing Buildings and New Construction; Urban In-Fill---Sensitive Use Development**
CASE NO.	**2022-009819ENV**
ADDRESS:	**3400 Laguna Street (Heritage on the Marina)**
BLOCK/LOT	**0471/003**
ZONING:	**RM-1 Residential-Mixed, Low Density Use District**

Ms. Poling:

INTRODUCTION

I have been retained to represent more than a dozen of the neighbors of the proposed project at 3400 Laguna Street, commonly known as the "Heritage on the Marina" (hereinafter "Heritage"). These comments are submitted in response to the Public Notice of Preparation of an Environmental Impact Report issued by your office on November 1, 2023, with a Comment Deadline for the EIR of December 1, 2023.

Heritage is a non-conforming use in a residential neighborhood, and the proposed plan to expand the facility by nearly 60,000 square feet including an extraordinary excavation of more than 15,000 cubic yards, and a "repositioning" or "realignment" of the existing structure to create a new rear yard area under the Planning Code is of great concern to the surrounding residents. As set forth below, Heritage is currently in violation of its approvals to operate in the neighborhood. It is currently in violation of its conditional use authorizations and the very code provisions which allowed it to remain in the neighborhood for all these years. Approval of the Project would place the Heritage even further out of compliance and conformity with the Planning Code and General Plan. The negative environmental impacts on the neighbors and the neighborhood of such a project are certain and predictable and must be carefully considered and mitigated or reduced.

Having a large residential/commercial enterprise in a residential neighborhood is always a difficult, situation for residents, but the proposal to nearly double the developed and working square footage at the Heritage is a shocking development to the neighbors. The project is poised to completely change the visual character of the neighborhood and will eliminate huge areas of open space, landscaping, and greenery, will a have profound negative visual impact on the historic resource of the Heritage building and will cast shadows on the adjacent public recreation area, Moscone Park Playground and Recreational Fields.

Part of the proposal is to construct a solid nearly unbroken wall of a forty-foot (40'), plus penthouses to fifty-five feet (55') building along Francisco Street, which is 100% residential. In addition to the bulk and overwhelming mass of the proposed project, there are also design and

character concerns, mostly related to the monolithic new four-story building planned for the entire length of the Francisco Street frontage which will overwhelm, shadow, and loom over the historic Heritage building and the neighbors. The roof top appurtenances planned for that new building will push its actual physical height well over fifty (50') feet, notwithstanding how the new building's height may be measured under the Planning Code. The proposal is startling and inappropriate for the neighborhood and will create and cast new extensive shadowing on Moscone Field and Fort Mason Park which are directly across Laguna Street (Moscone) and across Bay Street (Fort Mason). Further, under CEQA, the project (and facility) descriptions are not complete or accurate.

The neighbors previously requested the Dept to revisit the Preliminary Project Assessment because the application and project plans were incomplete, lacked basic, mandatory information (such as elevations) and mischaracterized the project as non-residential. This is a crucial distinction and change of direction, the application for the proposed project is directly contrary to how Heritage has previously characterized its facility and its' expansions in past applications (as residential) and contrary to the facts and past practices at the site. The attempt to transform what has always been a residential development into a non-residential development is purposeful by the applicant to escape mandatory obligations under the Planning Code to provide affordable housing and other community benefits. The Department must NOT allow this slight hand maneuver by the applicant and must mandate honest, consistent treatment of the site in keeping with the long history of development and expansion at Heritage.

The proposed project is extraordinary and exceptional just by its proposed massive addition in this well-established residential neighborhood, but it will also have negative impacts on the historic Heritage building and will shadow two parks. Such overwhelming impacts demand mitigation. Finally, the Department should not consider reviewing and approving a new expansion project at Heritage unless and until Heritage is brought into compliance with the Planning Code and General Plan. Heritage has for many years illegally and unfairly expanded its facility by acquiring nearby properties (not included in the project or facility description) and has incorporated these residential units into the facility without permits, applications or a change to its conditional use status.

1. **Heritage Is in Stark Violation of Its Conditional Use Status, the Planning Code, and the General Plan---No New Project and Expansion May be Considered or Approved**

In a manner strikingly similar to that employed illegally and improperly by the infamous Academy of Art University, Heritage has acquired buildings that are zoned and permitted for residential use as apartments and other residential purposes, only to cavalierly convert those buildings unlawfully into part of its residential care facility. These unlawful actions by Heritage have deprived the City and the community of critical housing stock, especially affordable rent-controlled housing. Heritage has overtaken at least three buildings adjacent to its property and has taken at least ten (10) residential units. Heritage has done all of this for many years without seeking or receiving the required authorization for the changes to its conditional use authorization or operating permits from the Planning Department.

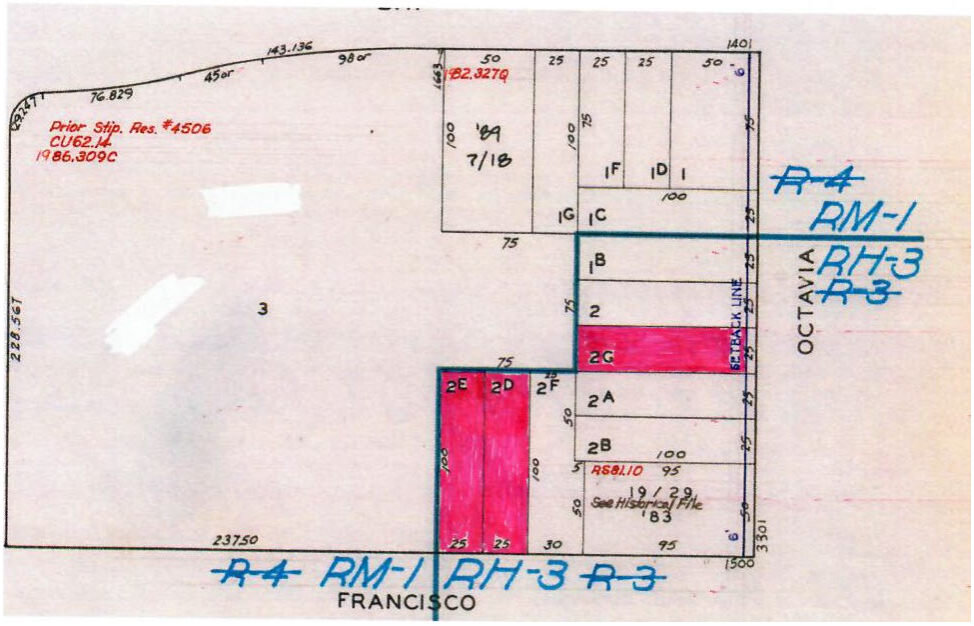
At a time when San Francisco is confronting a severe housing shortage, especially affordable rent-controlled housing, Heritage has illegally converted these units to its residential care facility use, exacerbating the already scarce supply of affordable housing. The Department should not even consider allowing Heritage to exponentially expand its facility with a new proposed project until it is brought into compliance with the Planning Code and General Plan, and it returns the many housing units it has unlawfully displaced to the San Francisco housing stock. By unilaterally taking over this housing stock without permits or authorization Heritage is in violation of the City's Administrative Code, Planning Code, and Building Code as well as in violation of its existing conditional use authorization and permitted use in the residential neighborhood in which it is

located. The zoning for the Heritage site is not compatible with the zoning for the adjacent buildings it has taken over. Heritage must divest itself of the buildings or obtain a new conditional use permit and an amendment to the Planning Code.

The housing units unlawfully taken over by Heritage and subsumed into its facility are as follows:

1536-1538 Francisco Street (Block/Lot: 0471/002E)	(4 Units)
1530 Francisco Street (Block/Lot: 0471/002D)	(3 Units)
3325-3327 Octavia Street (Block/Lot: 0471/002G)	(3 Units)

As shown in the Block Map below, the three buildings (ten housing units) illegally taken over by Heritage and folded into its facility, although adjacent to Heritage, are zoned differently (shown in red). This is "institutional creep" at its worst and no new project may be approved until these violations are resolved. Heritage has illegally "swallowed" these properties into its facility.



Heritage brazenly advertises these properties as part of its sales pitch to new would-be residents. With regard to offering these properties for occupancy, its website states as follows:

"*Francisco Street & Octavia Street Apartments*

Heritage on the Marina has three additional properties for active adults 65+ on Francisco Street and Octavia Street. These apartments offer the same great full-service amenities, 1- or 2-bedroom apartments, with full kitchens, washers and dryers, flexible security and 30 meals a month."

The proposed current massive expansion project sought by Heritage, coupled with its current and on-going violations will cause new significant environmental impacts due to a conflict with the City's established land use plan, housing policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect such as that being caused by Heritage—loss of housing and conversion of residential units to commercial, institutional uses. Heritage must be required to work cooperatively with the City (and the community) in planning for future growth in a manner that accounts for the urban nature of its facility, without adversely impacting the City's affordable or rent-controlled housing stock, or burdening its transportation system, including, as a

part of that plan, building new housing, or converting existing buildings, for its residents on property that is zoned for such use.

Because each of the above properties is being used in violation of the Planning Code, each is therefore unlawful and a public nuisance. SF Planning Code Section 176(a). Each of these properties is in a RH-3 (Residential, House Three-Family) Zoning District which differs from the Zoning District for Heritage which is RM-1 Residential-Mixed, Low Density Use District. The RH-3 Zoning District allows some group housing and residential care facilities; however, a building permit and conditional use authorization are required to permit such uses or to expand the Heritage use beyond its Zoning District. The conversion and loss of housing units to an institutional use also requires a building permit and conditional use authorization under Planning Codes Sections 171, 209.1, 303 & 317.

The Project Description Must be Rewritten to Include the Merger of Ten Units of Housing

Heritage does not include in its project description the acquisition of the ten (10) units of housing and the commercial exploitation and use of those housing units in its institutional facility. The project description is not accurate or complete. Heritage states it has "five existing buildings" when in fact it has eight (8) buildings because of the nearby apartments it has illegally made part of its facility. The gross square feet of the facility is also inaccurate as it does not include the additional three buildings. A conditional use authorization is required for the loss and merger of the ten units of sound affordable rent-controlled housing because the policy is to RETAIN such housing in the general housing stock. The loss of such housing to a merger into Heritage cannot possibly be found to be *"necessary and desirable"* for the community as is needed for a conditional use authorization. The loss of the housing to Heritage is directly contrary to all controlling public policy—and is a slap in the face of the public in the middle of an affordability crisis.

Retention of this type of affordable rental housing is the highest priority policy and a keystone to every plan to fight the affordability crisis in San Francisco. The loss of this housing to Heritage is contrary to the Mayor's Executive Directives, contrary to the General Plan and contrary to the controlling policies of the Housing Element all of which mandate the retention of the existing buildings in the general housing stock. There is no policy that might allow this type of sound, affordable housing to be merged and "exchanged" for new, market rate luxury retirement housing and to be subsumed into the Heritage facility. Once this type of housing is merged and taken from the housing stock, it is gone forever. There is a finite supply of this type of housing and the policies of the City demand its retention outside of Heritage.

Heritage is in Violation of its Conditional Use Authorizations and New Ones Cannot Be Granted for the Merger of Ten (10) Sound, Rent-Controlled Units –ALL Housing Policies Mandate Preservation of the Existing, *Naturally Affordable* Rent Controlled Housing Stock

San Francisco's highest Priority Policies are enumerated in the General Plan. Further, to the extent some policies may clash with others, (for example—the creation of new housing vs. retention of existing housing---such as here) the two policies that are to be given primacy are:

- **That the City's supply of affordable housing be preserved and enhanced.**
- **That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.**

This directive is also found in the Housing Element of the General Plan and these two policies form the basis upon which inconsistencies in the Housing Element and in other parts of the General Plan are to be resolved. Approval of this project violates numerous crucial and primary policies. The EIR must address and resolve the environmental impacts of the loss of such housing and the stark violations of the Planning Code, Housing Element and General Plan.

HOUSING ELEMENT

Objectives and Policies

OBJECTIVE 3: PROTECT THE AFFORDABILITY OF THE EXISTING HOUSING STOCK, ESPECIALLY RENTAL UNITS.

POLICY 3.3

Maintain balance in affordability of existing housing stock by supporting affordable moderate ownership opportunities.

POLICY 3.4

Preserve "naturally affordable" housing types such as smaller and older ownership units.

The ten units lost here to merger into Heritage are considered to be "naturally affordable" as described in policy 3.4 of the General Plan's Housing Element as being smaller rent controlled dwelling units. These units are all subject to the Rent Stabilization and Arbitration Ordinance, as the buildings were all constructed prior to 1979.

Endorsement of the proposed project would eliminate ten (10) naturally affordable units that are subject to rent control and replace them with luxury retirement market rate units that would not be subject to the Rent Stabilization and Arbitration Ordinance contrary to the policies and directives from the Mayor's Office to address the city's housing crisis. The proposed project is inconsistent with the objectives and policies of the General Plan and does nothing to protect affordability of the existing housing stock especially rental units and does nothing to maintain the balance of affordability or for moderate ownership opportunities---quite the opposite.

The elimination of ten functional "naturally affordable" rent controlled dwelling units by merger is contrary to the General Plan as well as to the Department's and the City's priority to preserve existing sound housing and to protect naturally affordable dwelling units. The proposed loss of the ten dwelling units is counter to the mayor's executive directives, which call for the protection of existing housing stock. The mayor has directed the Department to adopt policies and practices that encourage the preservation of existing housing stock.

The proposed project may not be approved because it endorses the removal and replacement of ten naturally affordable units and is contrary to the priority principle of housing unit retention. The current housing affordability crisis creates an exceptional and extraordinary circumstance such that the Department should deny the project unless or until moves are taken by Heritage to return the existing units. The General Plan and the Priority Policies make it clear that Heritage cannot "trade" the existing rent-controlled housing on the site for additional units of luxury retirement housing.

The business practices of Heritage violate these polices and initiatives to protect the existing housing stock. The requested EIR (and new conditional use authorizations) must resolve these

issues and approval cannot be granted in the face of this overwhelming policy mandate. The loss of ten units of existing rent-controlled housing and the permanent loss of the opportunity to create more such housing cannot possibly be "necessary and desirable" in the City of San Francisco at this time and no mitigations can address or resolve such impacts other than "no project."

At a minimum, the project should be returned to the Dept. for review in the face of these new mandates and a new project description and review is needed. A project that retains the existing housing and perhaps adds new units to the existing building is far more in line with the housing needed in the City and with the directives and policies already in place as well as the housing policy priorities announced by the mayor.

2. **Historic Resource and Aesthetics---**

The Heritage building was designed by renowned architect Julia Morgan in 1925, and although it is not on the State or National Register of historic places, the Page & Turnbull Historic Resources Evaluation Report makes clear it should be or could be. She also designed Hearst Castle, numerous buildings on the UC Campus, the Los Angeles Examiner Building, the YWCA in Chinatown, in the City of San Francisco, Riverside Art Museum, Asilomar Conference Grounds and many others.

As made clear in the considered opinion submitted by Christopher VerPlanck, the proposed new modern buildings will overwhelm and detract from the Heritage building and its value as a historic resource. The new building will be TALLER and will physically shadow the Heritage building. The modern design and flat roofs will look odd and angular next to the sloped gables and brick facades of the Heritage building. The building is an important cultural resource, and the new buildings will overpower it and negatively impact its aesthetic. The proposal will cause a substantial adverse change in the significance of a historical resource. Mitigations could (should) include reducing the size of the project, sloped roofs, reduction in height, and setting all new additions to the east away from the Julia Morgan building. The new building will "loom" over the historic resource and detract from its gothic brick appearance with a modern square box of glass and metal directly adjacent and over top of it. Perhaps worst of all, the new buildings will completely block from public view the South facing and East facing façades of the building.

The project will have a substantial adverse effect on the scenic vista and views towards the water from the surrounding area and, as Mr. VerPlanck concludes, will substantially damage, and degrade the present scenic resource of the Julie Morgan Building and its immediate surroundings and context. It will substantially damage the existing visual character and quality of public views of the site and its surroundings. Mr. VerPlanck's conclusions are substantial evidence that the project will cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations, Title 14, §15064.5. Feasible measures to mitigate the significant adverse changes in the significance of the historical resource include no project or a substantially reduced project in size and scope. At present the Project does not meet or comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

The Large "Addition" of 58,000 Square Feet of New Built Environment Will Negatively Impact the Historic Resource, its "Feel" and at 40+ Feet Tall, Will Obscure its Features

As can be clearly seen from the proposed project elevations on the plans, this project will place the historic and iconic three story Heritage buildng in an artifical "valley" of new four story buildings on three sides. Heritage will be in a "box" surrounded by taller buildings on all sides.The subject site ALREADY looms over the neighbors' smaller buildings and gardens, adding new modern buildings in excess of four-floors will require removal of all side yards and remove all landscaping from the south facing portion of the grounds. As pointed out in the Page & Turnbull Report and

echoed in VerPlanck Memorandum, the landscaping and surrounding greeenery on the lot is an important part of the "feel" of the historic resource and its value and integrity as a historic resource. As stated in the report:

"FEELING
The property's continued use as a care facility for the elderly, as well as its current landscaped grounds (although not strictly historic in character), support the property's integrity of feeling, allowing it to convey the peaceful atmosphere that characterized the property during its period of significance." (Page & Turnbull Historic Resources Evaluation p.71)

Further, the proposal to add additional four story buildings, will obscure and cpmpletely block from public view some of the most important and prominent defining features of the historic resource. The Page & Trunbull Report states that the building's features ON ALL SIDES are part of the value and defining elements that are important to integrity of this historic resource. At page 71-72 the report states:

"CHARACTER-DEFINING FEATURES

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character- defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The following character-defining features have been identified for the property at 3400 Laguna Street:

Main Building

- *Overall regular massing and intersecting hipped roof*
- *U-shaped plan, consisting of central volume, north and south wings at east façade, and projections at north and south façades*
- *Structural brick exterior walls*
- *Slate roof shingles*
- *Symmetrical arrangement of front façade, with central gabled parapet*
- *Historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows*
- *Projecting canted bays*
- *Hipped dormer windows at roof*
- *Operable, divided-lite windows retaining historic configurations*
- *Terra cotta details: window surrounds with vegetative motifs in segmental arches; decorative panels and entablatures at canted bays; belt course above second level windows; projecting cornice with buttons at eave; coping and*

finial at central gabled parapet; double arched door surround at primary entrance vestibule

- *Arched ground-level door openings at ground level*
- *Stained glass windows at interior chapel*
- *Additional historic design features: narrow blind niche and recessed diamond and square details in brick*
- *Historic glazed doors within entrance vestibule*
- *Three brick chimneys*
- *Front double stairs with iron railing*
- *Towers and penthouse at east façade*
- *Rain catch baskets*
- *Historic features in publicly accessible interior areas include:*
  - *Tile floor*
  - *Central stairwell with trefoil railing*
  - *Fireplace mantel*
  - *Wood coffered ceiling"*

The new large 55' foot tall building planned for the south side of the property will completely block from view most of the southern façade of the historic resource and will obscure the intersecting hipped roof, projections at south façade, structural brick exterior walls, slate roof shingles, historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows (three such windows will be completely blocked from view on the south side of the building) and numerous other features will be obscured. The plan's elevations positively demonstrate that the new buildings are overwhelming and obscuring the historic resource.



Above is a rendering from the project plans showing the proposed south elevation (omitted from the plans first accepted by the Dept) that show the Heritage building as obscured, blocked from public view and smaller and less important than the proposed new building. The same view as it is currently shown in the photo below. The historic experts agree that the view of the elements on the north façade of the building are part, or it value as a historic resource and the new project will obscure those elements.



There can be no question that the proposed project will have a devastating negative visual impact on the Heritage and its value as an important cultural and historic resource. Many of the important and defining features of the historic resource on the roof and the south side window arrangement and fenestration will be lost from view by the new proposed building. The new building will be above Heritage, behind it and beside it, drawing the emphasis to the towering new buildings and away from the important historic resource.

3. **Shadowing**

In addition to visually overwhelming the historic resource with its size and height, the new proposed structure will also shadow the Heritage building. The addition on the south side of the existing Heritage building at 55’ feet will cast a permanent shadow over much of the existing facility including the front yard landscaping, the interior courtyard of the Heritage building and other interior spaces in the Heritage list as valuable to the integrity of the historic resource by Page and & Turnbull. In addition to the shadowing of the existing facility, the new building will shadow nearby parks and recreational facilities.

The building is adjacent to two parks and recreational areas and will substantially shadow both of those sites. The elevator and utility penthouses will exceed fifty feet (50’) in height. The shadows are a direct result of this overreach in height, which is unusually tall for the area. The Heritage is located to the south and east of George R. Moscone Park and Recreation Area, directly across Laguna Street. Pyron Park, part of the Fort Mason complex in the Golden Gate National Recreation Area is directly north and across Bay Street from the site. Both parks will receive substantial new shadowing from the new fifty-five (55’) foot tall structures planned for the Heritage site. A shadow analysis is

required. As set forth in the Planning Dept's Shadow Analysis Procedures and Scope Requirements:

In the City and County of San Francisco, there are two circumstances which could trigger the need for a shadow analysis:

1. If the proposed project would be over 40 feet tall, and could potentially cast new shadow on a property under the jurisdiction of the Recreation and Park Department, per San Francisco Planning Code Section 295; and/or
2. If the proposed project is subject to review under the California Environmental Quality Act (CEQA) and would potentially cast new shadow on a park or open space such that the use or enjoyment of that park or open space could be adversely affected.

Here both situations are present. With the various penthouses, the building on the south facing elevation will be fifty feet (55') tall and it will shadow Park and Recreation land and is subject to CEQA review. The shadow fan included in the Dept's packet shows that the shadowing will be substantial over the Moscone Softball fields and in particular the home plate area located in the northeast corner of the park. The new shadows could (will) certainly have an adverse effect on the use of the park and the public's ability to enjoy it.

4. **Excavation in an Air Pollutant Exposure Zone-Health Code Article 38**

The planned excavation is substantial and more than 15,000 cubic yards and 27,000 square feet. This site is in an Air Pollutant Exposure Zone and is subject to Health Code Article 38. The site is in an area with elevated pollutant concentrations. The Heritage is a sensitive use building, as defined in the applicable section of the Ordinance, and must comply with Health Code Article 38. The EIR being prepared for the project must require mitigations for this project because it will generate air pollutants during excavation. Although the site itself is not known or identified as a hazardous waste site there is a site nearby at 1598 Bay Street from which toxins may have migrated. Substantial mitigations are needed for the large excavation site and to be put in place during the process. This is a major alteration to a sensitive use (retirement home).

5. **Maher Ordinance**

Properties with potential hazardous subsurface contamination that require a grading or building or street use permit may be regulated under the San Francisco Maher Ordinance: Article 22A of the San Francisco Health Code and Article 106A.3.2.4 of the San Francisco Building Code. The Maher Ordinance covers areas with current or historical industrial use or zoning; areas within one hundred feet (100') of current or historical underground tanks; filled former Bay, marsh, or creek areas; or areas within 150 feet of a current or former elevated highway. Sites and areas covered per the Maher Ordinance are shown as shaded areas on the Maher map.

This site appears on the Maher Map and is subject to the Ordinance. As the historic maps included in the Page & Turnbull Report illustrate, this entire site was probably filled

former Bay or a marsh and creek area. The excavation is proposed at some fifteen feet (15') in depth and will cover a wide area.

6. **Parking and Traffic**

The Project includes 18 new parking spaces and a new curb cut. Including the new capacity, the project will add new traffic and parking woes to the neighborhood. Loading docks on the residential street will also lead to negative impacts for the neighborhood.

7. **Loss of Open Space and Landscaping**

Presently, the grounds have several trees and nice-looking landscaping presented to the surrounding streets. The proposal to eliminate all landscaping except the front yard area will leave only a stark façade facing the residential block on Francisco Street is a negative impact and eliminates much of the open space on the subject lot. Worse, the Project is seeking variances or exceptions to *change the orientation of its lot* by treating Bay Street as the front instead of a Laguna Street, which is and has always been the entrance to the Morgan mansion, for the rear yard requirement through the Conditional Use Authorization process and as a Planned Unit Development.

This is an attempt to manipulate the Dept's rules and regulations to allow the Heritage to treat Francisco Street as the rear and build to the property line with no curb cuts, landscaping, setbacks, or other design features that would otherwise be required. The Heritage already built the Perry Building in 1957 at the rear of its lot (nearest Octavia Street). To allow it to arbitrarily shift its parcel orientation by 90 degrees would be to allow Heritage to manipulate the Dept's rules and regulations to the detriment of the public interest with certain negative impacts to the surrounding residents.

8. **Variances, Waivers and Exceptions**

The building and its use are out of place in a residential neighborhood and should not be moved further out of conformity with the code and the neighborhood. The project will require a variety of waivers, and exceptions from code requirements for rear yard and exposure (units looking on to open space). Nonconforming uses should not be allowed to go further out of conformity and allowing such a result is directly at odds with the Planning Code and the General Plan.

CONCLUSION

The project description and description of the existing facility are not complete or accurate. The acquisition of the three adjacent apartment buildings must be taken into account, included in the description of the facility and the project, and resolved with the existing conditional use authorizations, the Planning Code, and the General Plan.

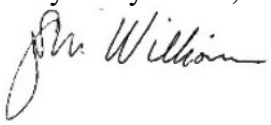
The negative environmental impacts of the proposal are numerous. The new proposed four-story buildings will overwhelm and overshadow the important historic resource of the Heritage's Julia Morgan mansion. The neighbors who live near the Heritage wish to continue a good relationship with the Heritage as their over-sized and out of place neighbor. However, the aggressive and startling proposal to increase the size of the facility by nearly 100% is not compatible with the neighborhood and is exactly why

neighbors opposed the Heritage with its first request for additions beginning back in the 1950's. Neighbors at all previous hearings on the conditional authorizations that keep Heritage in the neighborhood voiced fear and concern about future, unreasonable and unchecked expansion in a residential neighborhood. That is exactly what this proposal represents.

The neighbors are counting on the Dept to enforce the underlying policies of the Planning Code and General Plan as well as CEQA and its underlying spirit and purpose to protect the residential neighborhoods by requiring and suggesting mitigations which will reduce the overwhelming size and overwhelming impacts of the proposal.

Thank you for your consideration and attention to this matter.

Very Truly Yours,



STEPHEN M. WILLIAMS

SMW | LAW OFFICES OF
STEPHEN M. WILLIAMS
1934 Divisadero Street | San Francisco, CA 94115

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PLANNING DEPARTMENT
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Jeanie Poling, Senior Environmental Planner
San Francisco Planning Department
1660 Mission Street, Suite 400
San Francisco, CA 94102

94103-241460

SMW | LAW OFFICES OF
STEPHEN M. WILLIAMS

1934 Divisadero Street | San Francisco, CA 94115 | TEL: 415.292.3656 | FAX: 415.776.8047 | smw@stevewilliamslaw.com

Jeanie Poling, Senior Environmental Planner
San Francisco Planning Department
1660 Mission Street, Suite 400
San Francisco, CA 94102

December 1, 2023

RE:	**Comments on Proposed Project for Preparation of an Environmental Impact Report**
PROJECT:	**Demolition of Existing Buildings and New Construction; Urban In-Fill---Sensitive Use Development**
CASE NO.	**2022-009819ENV**
ADDRESS:	**3400 Laguna Street (Heritage on the Marina)**
BLOCK/LOT	**0471/003**
ZONING:	**RM-1 Residential-Mixed, Low Density Use District**

Ms. Poling:

INTRODUCTION

I have been retained to represent more than a dozen of the neighbors of the proposed project at 3400 Laguna Street, commonly known as the "Heritage on the Marina" (hereinafter "Heritage"). These comments are submitted in response to the Public Notice of Preparation of an Environmental Impact Report issued by your office on November 1, 2023, with a Comment Deadline for the EIR of December 1, 2023.

Heritage is a non-conforming use in a residential neighborhood, and the proposed plan to expand the facility by nearly 60,000 square feet including an extraordinary excavation of more than 15,000 cubic yards, and a "repositioning" or "realignment" of the existing structure to create a new rear yard area under the Planning Code is of great concern to the surrounding residents. As set forth below, Heritage is currently in violation of its approvals to operate in the neighborhood. It is currently in violation of its conditional use authorizations and the very code provisions which allowed it to remain in the neighborhood for all these years. Approval of the Project would place the Heritage even further out of compliance and conformity with the Planning Code and General Plan. The negative environmental impacts on the neighbors and the neighborhood of such a project are certain and predictable and must be carefully considered and mitigated or reduced.

Having a large residential/commercial enterprise in a residential neighborhood is always a difficult, situation for residents, but the proposal to nearly double the developed and working square footage at the Heritage is a shocking development to the neighbors. The project is poised to completely change the visual character of the neighborhood and will eliminate huge areas of open space, landscaping, and greenery, will a have profound negative visual impact on the historic resource of the Heritage building and will cast shadows on the adjacent public recreation area, Moscone Park Playground and Recreational Fields.

Part of the proposal is to construct a solid nearly unbroken wall of a forty-foot (40'), plus penthouses to fifty-five feet (55') building along Francisco Street, which is 100% residential. In addition to the bulk and overwhelming mass of the proposed project, there are also design and

character concerns, mostly related to the monolithic new four-story building planned for the entire length of the Francisco Street frontage which will overwhelm, shadow, and loom over the historic Heritage building and the neighbors. The roof top appurtenances planned for that new building will push its actual physical height well over fifty (50') feet, notwithstanding how the new building's height may be measured under the Planning Code. The proposal is startling and inappropriate for the neighborhood and will create and cast new extensive shadowing on Moscone Field and Fort Mason Park which are directly across Laguna Street (Moscone) and across Bay Street (Fort Mason). Further, under CEQA, the project (and facility) descriptions are not complete or accurate.

The neighbors previously requested the Dept to revisit the Preliminary Project Assessment because the application and project plans were incomplete, lacked basic, mandatory information (such as elevations) and mischaracterized the project as non-residential. This is a crucial distinction and change of direction, the application for the proposed project is directly contrary to how Heritage has previously characterized its facility and its' expansions in past applications (as residential) and contrary to the facts and past practices at the site. The attempt to transform what has always been a residential development into a non-residential development is purposeful by the applicant to escape mandatory obligations under the Planning Code to provide affordable housing and other community benefits. The Department must NOT allow this slight hand maneuver by the applicant and must mandate honest, consistent treatment of the site in keeping with the long history of development and expansion at Heritage.

The proposed project is extraordinary and exceptional just by its proposed massive addition in this well-established residential neighborhood, but it will also have negative impacts on the historic Heritage building and will shadow two parks. Such overwhelming impacts demand mitigation. Finally, the Department should not consider reviewing and approving a new expansion project at Heritage unless and until Heritage is brought into compliance with the Planning Code and General Plan. Heritage has for many years illegally and unfairly expanded its facility by acquiring nearby properties (not included in the project or facility description) and has incorporated these residential units into the facility without permits, applications or a change to its conditional use status.

1. **Heritage Is in Stark Violation of Its Conditional Use Status, the Planning Code, and the General Plan---No New Project and Expansion May be Considered or Approved**

In a manner strikingly similar to that employed illegally and improperly by the infamous Academy of Art University, Heritage has acquired buildings that are zoned and permitted for residential use as apartments and other residential purposes, only to cavalierly convert those buildings unlawfully into part of its residential care facility. These unlawful actions by Heritage have deprived the City and the community of critical housing stock, especially affordable rent-controlled housing. Heritage has overtaken at least three buildings adjacent to its property and has taken at least ten (10) residential units. Heritage has done all of this for many years without seeking or receiving the required authorization for the changes to its conditional use authorization or operating permits from the Planning Department.

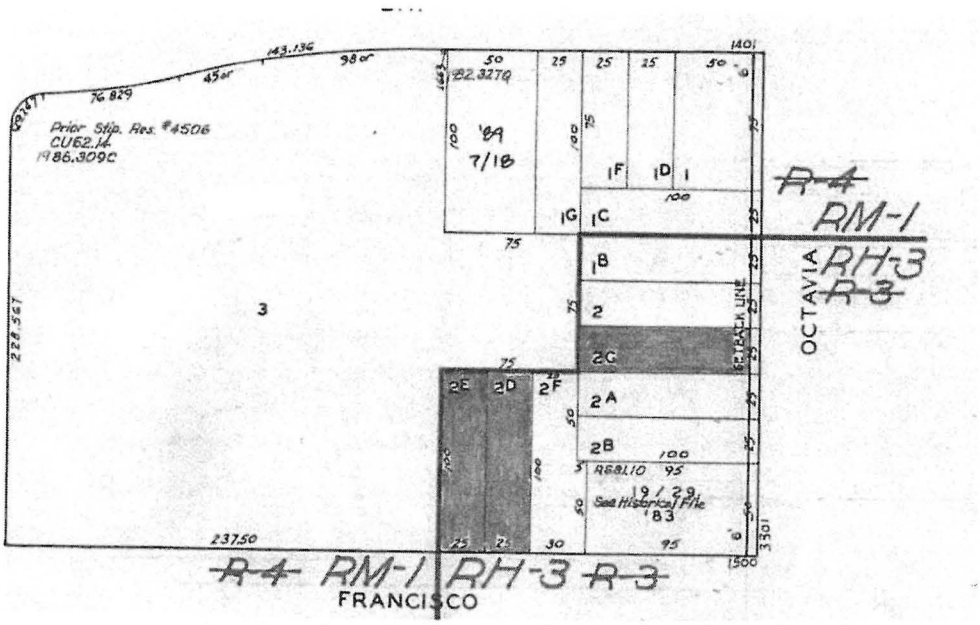
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located. The zoning for the Heritage site is not compatible with the zoning for the adjacent buildings it has taken over. Heritage must divest itself of the buildings or obtain a new conditional use permit and an amendment to the Planning Code.

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"*Francisco Street & Octavia Street Apartments*

Heritage on the Marina has three additional properties for active adults 65+ on Francisco Street and Octavia Street. These apartments offer the same great full-service amenities, 1- or 2-bedroom apartments, with full kitchens, washers and dryers, flexible security and 30 meals a month."

The proposed current massive expansion project sought by Heritage, coupled with its current and on-going violations will cause new significant environmental impacts due to a conflict with the City's established land use plan, housing policies, and regulations that were adopted for the purpose of avoiding or mitigating an environmental effect such as that being caused by Heritage—loss of housing and conversion of residential units to commercial, institutional uses. Heritage must be required to work cooperatively with the City (and the community) in planning for future growth in a manner that accounts for the urban nature of its facility, without adversely impacting the City's affordable or rent-controlled housing stock, or burdening its transportation system, including, as a

part of that plan, building new housing, or converting existing buildings, for its residents on property that is zoned for such use.

Because each of the above properties is being used in violation of the Planning Code, each is therefore unlawful and a public nuisance. SF Planning Code Section 176(a). Each of these properties is in a RH-3 (Residential, House Three-Family) Zoning District which differs from the Zoning District for Heritage which is RM-1 Residential-Mixed, Low Density Use District. The RH-3 Zoning District allows some group housing and residential care facilities; however, a building permit and conditional use authorization are required to permit such uses or to expand the Heritage use beyond its Zoning District. The conversion and loss of housing units to an institutional use also requires a building permit and conditional use authorization under Planning Codes Sections 171, 209.1, 303 & 317.

The Project Description Must be Rewritten to Include the Merger of Ten Units of Housing

Heritage does not include in its project description the acquisition of the ten (10) units of housing and the commercial exploitation and use of those housing units in its institutional facility. The project description is not accurate or complete. Heritage states it has "five existing buildings" when in fact it has eight (8) buildings because of the nearby apartments it has illegally made part of its facility. The gross square feet of the facility is also inaccurate as it does not include the additional three buildings. A conditional use authorization is required for the loss and merger of the ten units of sound affordable rent-controlled housing because the policy is to RETAIN such housing in the general housing stock. The loss of such housing to a merger into Heritage cannot possibly be found to be *"necessary and desirable"* for the community as is needed for a conditional use authorization. The loss of the housing to Heritage is directly contrary to all controlling public policy—and is a slap in the face of the public in the middle of an affordability crisis.

Retention of this type of affordable rental housing is the highest priority policy and a keystone to every plan to fight the affordability crisis in San Francisco. The loss of this housing to Heritage is contrary to the Mayor's Executive Directives, contrary to the General Plan and contrary to the controlling policies of the Housing Element all of which mandate the retention of the existing buildings in the general housing stock. There is no policy that might allow this type of sound, affordable housing to be merged and "exchanged" for new, market rate luxury retirement housing and to be subsumed into the Heritage facility. Once this type of housing is merged and taken from the housing stock, it is gone forever. There is a finite supply of this type of housing and the policies of the City demand its retention outside of Heritage.

Heritage is in Violation of its Conditional Use Authorizations and New Ones Cannot Be Granted for the Merger of Ten (10) Sound, Rent-Controlled Units –ALL Housing Policies Mandate Preservation of the Existing, *Naturally Affordable* Rent Controlled Housing Stock

San Francisco's highest Priority Policies are enumerated in the General Plan. Further, to the extent some policies may clash with others, (for example—the creation of new housing vs. retention of existing housing---such as here) the two policies that are to be given primacy are:

- **That the City's supply of affordable housing be preserved and enhanced.**
- **That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.**

This directive is also found in the Housing Element of the General Plan and these two policies form the basis upon which inconsistencies in the Housing Element and in other parts of the General Plan are to be resolved. Approval of this project violates numerous crucial and primary policies. The EIR must address and resolve the environmental impacts of the loss of such housing and the stark violations of the Planning Code, Housing Element and General Plan.

HOUSING ELEMENT

Objectives and Policies

OBJECTIVE 3: PROTECT THE AFFORDABILITY OF THE EXISTING HOUSING STOCK, ESPECIALLY RENTAL UNITS.

POLICY 3.3

Maintain balance in affordability of existing housing stock by supporting affordable moderate ownership opportunities.

POLICY 3.4

Preserve "naturally affordable" housing types such as smaller and older ownership units.

The ten units lost here to merger into Heritage are considered to be "naturally affordable" as described in policy 3.4 of the General Plan's Housing Element as being smaller rent controlled dwelling units. These units are all subject to the Rent Stabilization and Arbitration Ordinance, as the buildings were all constructed prior to 1979.

Endorsement of the proposed project would eliminate ten (10) naturally affordable units that are subject to rent control and replace them with luxury retirement market rate units that would not be subject to the Rent Stabilization and Arbitration Ordinance contrary to the policies and directives from the Mayor's Office to address the city's housing crisis. The proposed project is inconsistent with the objectives and policies of the General Plan and does nothing to protect affordability of the existing housing stock especially rental units and does nothing to maintain the balance of affordability or for moderate ownership opportunities---quite the opposite.

The elimination of ten functional "naturally affordable" rent controlled dwelling units by merger is contrary to the General Plan as well as to the Department's and the City's priority to preserve existing sound housing and to protect naturally affordable dwelling units. The proposed loss of the ten dwelling units is counter to the mayor's executive directives, which call for the protection of existing housing stock. The mayor has directed the Department to adopt policies and practices that encourage the preservation of existing housing stock.

The proposed project may not be approved because it endorses the removal and replacement of ten naturally affordable units and is contrary to the priority principle of housing unit retention. The current housing affordability crisis creates an exceptional and extraordinary circumstance such that the Department should deny the project unless or until moves are taken by Heritage to return the existing units. The General Plan and the Priority Policies make it clear that Heritage cannot "trade" the existing rent-controlled housing on the site for additional units of luxury retirement housing.

The business practices of Heritage violate these polices and initiatives to protect the existing housing stock. The requested EIR (and new conditional use authorizations) must resolve these

issues and approval cannot be granted in the face of this overwhelming policy mandate. The loss of ten units of existing rent-controlled housing and the permanent loss of the opportunity to create more such housing cannot possibly be "necessary and desirable" in the City of San Francisco at this time and no mitigations can address or resolve such impacts other than "no project."

At a minimum, the project should be returned to the Dept. for review in the face of these new mandates and a new project description and review is needed. A project that retains the existing housing and perhaps adds new units to the existing building is far more in line with the housing needed in the City and with the directives and policies already in place as well as the housing policy priorities announced by the mayor.

2. **Historic Resource and Aesthetics---**

The Heritage building was designed by renowned architect Julia Morgan in 1925, and although it is not on the State or National Register of historic places, the Page & Turnbull Historic Resources Evaluation Report makes clear it should be or could be. She also designed Hearst Castle, numerous buildings on the UC Campus, the Los Angeles Examiner Building, the YWCA in Chinatown, in the City of San Francisco, Riverside Art Museum, Asilomar Conference Grounds and many others.

As made clear in the considered opinion submitted by Christopher VerPlanck, the proposed new modern buildings will overwhelm and detract from the Heritage building and its value as a historic resource. The new building will be TALLER and will physically shadow the Heritage building. The modern design and flat roofs will look odd and angular next to the sloped gables and brick facades of the Heritage building. The building is an important cultural resource, and the new buildings will overpower it and negatively impact its aesthetic. The proposal will cause a substantial adverse change in the significance of a historical resource. Mitigations could (should) include reducing the size of the project, sloped roofs, reduction in height, and setting all new additions to the east away from the Julia Morgan building. The new building will "loom" over the historic resource and detract from its gothic brick appearance with a modern square box of glass and metal directly adjacent and over top of it. Perhaps worst of all, the new buildings will completely block from public view the South facing and East facing façades of the building.

The project will have a substantial adverse effect on the scenic vista and views towards the water from the surrounding area and, as Mr. VerPlanck concludes, will substantially damage, and degrade the present scenic resource of the Julie Morgan Building and its immediate surroundings and context. It will substantially damage the existing visual character and quality of public views of the site and its surroundings. Mr. VerPlanck's conclusions are substantial evidence that the project will cause a substantial adverse change in the significance of a historical resource pursuant to California Code of Regulations, Title 14, §15064.5. Feasible measures to mitigate the significant adverse changes in the significance of the historical resource include no project or a substantially reduced project in size and scope. At present the Project does not meet or comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

The Large "Addition" of 58,000 Square Feet of New Built Environment Will Negatively Impact the Historic Resource, its "Feel" and at 40+ Feet Tall, Will Obscure its Features

As can be clearly seen from the proposed project elevations on the plans, this project will place the historic and iconic three story Heritage buildng in an artifical "valley" of new four story buildings on three sides. Heritage will be in a "box" surrounded by taller buildings on all sides.The subject site ALREADY looms over the neighbors' smaller buildings and gardens, adding new modern buildings in excess of four-floors will require removal of all side yards and remove all landscaping from the south facing portion of the grounds. As pointed out in the Page & Turnbull Report and

echoed in VerPlanck Memorandum, the landscaping and surrounding greeenery on the lot is an important part of the "feel" of the historic resource and its value and integrity as a historic resource. As stated in the report:

"FEELING
The property's continued use as a care facility for the elderly, as well as its current landscaped grounds (although not strictly historic in character), support the property's integrity of feeling, allowing it to convey the peaceful atmosphere that characterized the property during its period of significance." (Page & Turnbull Historic Resources Evaluation p.71)

Further, the proposal to add additional four story buildings, will obscure and cpmpletely block from public view some of the most important and prominent defining features of the historic resource. The Page & Trunbull Report states that the building's features ON ALL SIDES are part of the value and defining elements that are important to integrity of this historic resource. At page 71-72 the report states:

"CHARACTER-DEFINING FEATURES

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character- defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The following character-defining features have been identified for the property at 3400 Laguna Street:

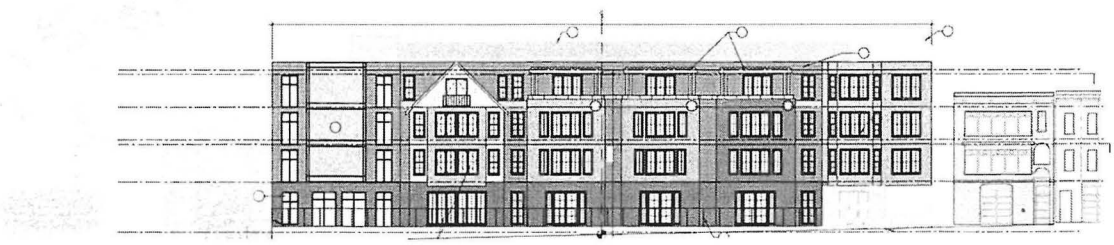
Main Building

- *Overall regular massing and intersecting hipped roof*
- *U-shaped plan, consisting of central volume, north and south wings at east façade, and projections at north and south façades*
- *Structural brick exterior walls*
- *Slate roof shingles*
- *Symmetrical arrangement of front façade, with central gabled parapet*
- *Historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows*
- *Projecting canted bays*
- *Hipped dormer windows at roof*
- *Operable, divided-lite windows retaining historic configurations*
- *Terra cotta details: window surrounds with vegetative motifs in segmental arches; decorative panels and entablatures at canted bays; belt course above second level windows; projecting cornice with buttons at eave; coping and*

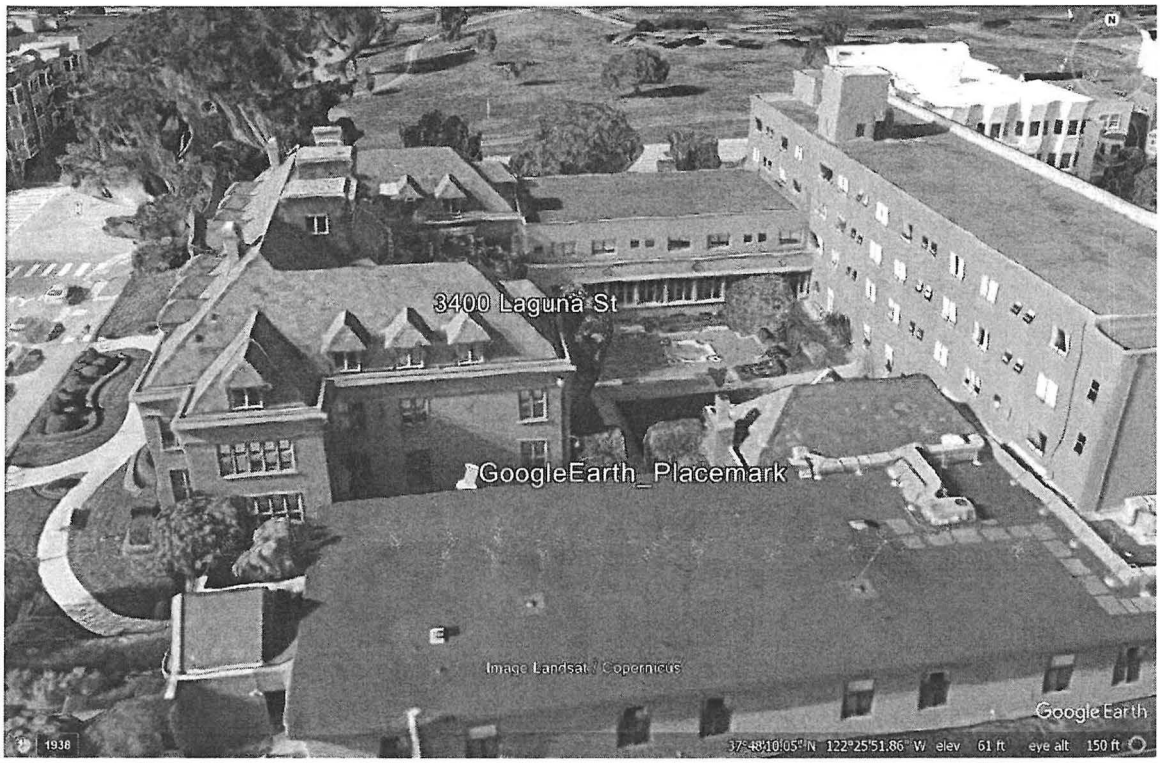
finial at central gabled parapet; double arched door surround at primary entrance vestibule

- *Arched ground-level door openings at ground level*
- *Stained glass windows at interior chapel*
- *Additional historic design features: narrow blind niche and recessed diamond and square details in brick*
- *Historic glazed doors within entrance vestibule*
- *Three brick chimneys*
- *Front double stairs with iron railing*
- *Towers and penthouse at east façade*
- *Rain catch baskets*
- *Historic features in publicly accessible interior areas include:*
  - *Tile floor*
  - *Central stairwell with trefoil railing*
  - *Fireplace mantel*
  - *Wood coffered ceiling"*

The new large 55' foot tall building planned for the south side of the property will completely block from view most of the southern façade of the historic resource and will obscure the intersecting hipped roof, projections at south façade, structural brick exterior walls, slate roof shingles, historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows (three such windows will be completely blocked from view on the south side of the building) and numerous other features will be obscured. The plan's elevations positively demonstrate that the new buildings are overwhelming and obscuring the historic resource.



Above is a rendering from the project plans showing the proposed south elevation (omitted from the plans first accepted by the Dept) that show the Heritage building as obscured, blocked from public view and smaller and less important than the proposed new building. The same view as it is currently shown in the photo below. The historic experts agree that the view of the elements on the north façade of the building are part, or it value as a historic resource and the new project will obscure those elements.



There can be no question that the proposed project will have a devastating negative visual impact on the Heritage and its value as an important cultural and historic resource. Many of the important and defining features of the historic resource on the roof and the south side window arrangement and fenestration will be lost from view by the new proposed building. The new building will be above Heritage, behind it and beside it, drawing the emphasis to the towering new buildings and away from the important historic resource.

3. **Shadowing**

In addition to visually overwhelming the historic resource with its size and height, the new proposed structure will also shadow the Heritage building. The addition on the south side of the existing Heritage building at 55' feet will cast a permanent shadow over much of the existing facility including the front yard landscaping, the interior courtyard of the Heritage building and other interior spaces in the Heritage list as valuable to the integrity of the historic resource by Page and & Turnbull. In addition to the shadowing of the existing facility, the new building will shadow nearby parks and recreational facilities.

The building is adjacent to two parks and recreational areas and will substantially shadow both of those sites. The elevator and utility penthouses will exceed fifty feet (50') in height. The shadows are a direct result of this overreach in height, which is unusually tall for the area. The Heritage is located to the south and east of George R. Moscone Park and Recreation Area, directly across Laguna Street. Pyron Park, part of the Fort Mason complex in the Golden Gate National Recreation Area is directly north and across Bay Street from the site. Both parks will receive substantial new shadowing from the new fifty-five (55') foot tall structures planned for the Heritage site. A shadow analysis is

required. As set forth in the Planning Dept's Shadow Analysis Procedures and Scope Requirements:

In the City and County of San Francisco, there are two circumstances which could trigger the need for a shadow analysis:

1. If the proposed project would be over 40 feet tall, and could potentially cast new shadow on a property under the jurisdiction of the Recreation and Park Department, per San Francisco Planning Code Section 295; and/or
2. If the proposed project is subject to review under the California Environmental Quality Act (CEQA) and would potentially cast new shadow on a park or open space such that the use or enjoyment of that park or open space could be adversely affected.

Here both situations are present. With the various penthouses, the building on the south facing elevation will be fifty feet (55') tall and it will shadow Park and Recreation land and is subject to CEQA review. The shadow fan included in the Dept's packet shows that the shadowing will be substantial over the Moscone Softball fields and in particular the home plate area located in the northeast corner of the park. The new shadows could (will) certainly have an adverse effect on the use of the park and the public's ability to enjoy it.

4. **Excavation in an Air Pollutant Exposure Zone-Health Code Article 38**

The planned excavation is substantial and more than 15,000 cubic yards and 27,000 square feet. This site is in an Air Pollutant Exposure Zone and is subject to Health Code Article 38. The site is in an area with elevated pollutant concentrations. The Heritage is a sensitive use building, as defined in the applicable section of the Ordinance, and must comply with Health Code Article 38. The EIR being prepared for the project must require mitigations for this project because it will generate air pollutants during excavation. Although the site itself is not known or identified as a hazardous waste site there is a site nearby at 1598 Bay Street from which toxins may have migrated. Substantial mitigations are needed for the large excavation site and to be put in place during the process. This is a major alteration to a sensitive use (retirement home).

5. **Maher Ordinance**

Properties with potential hazardous subsurface contamination that require a grading or building or street use permit may be regulated under the San Francisco Maher Ordinance: Article 22A of the San Francisco Health Code and Article 106A.3.2.4 of the San Francisco Building Code. The Maher Ordinance covers areas with current or historical industrial use or zoning; areas within one hundred feet (100') of current or historical underground tanks; filled former Bay, marsh, or creek areas; or areas within 150 feet of a current or former elevated highway. Sites and areas covered per the Maher Ordinance are shown as shaded areas on the Maher map.

This site appears on the Maher Map and is subject to the Ordinance. As the historic maps included in the Page & Turnbull Report illustrate, this entire site was probably filled

former Bay or a marsh and creek area. The excavation is proposed at some fifteen feet (15') in depth and will cover a wide area.

6. **Parking and Traffic**

The Project includes 18 new parking spaces and a new curb cut. Including the new capacity, the project will add new traffic and parking woes to the neighborhood. Loading docks on the residential street will also lead to negative impacts for the neighborhood.

7. **Loss of Open Space and Landscaping**

Presently, the grounds have several trees and nice-looking landscaping presented to the surrounding streets. The proposal to eliminate all landscaping except the front yard area will leave only a stark façade facing the residential block on Francisco Street is a negative impact and eliminates much of the open space on the subject lot. Worse, the Project is seeking variances or exceptions to *change the orientation of its lot* by treating Bay Street as the front instead of a Laguna Street, which is and has always been the entrance to the Morgan mansion, for the rear yard requirement through the Conditional Use Authorization process and as a Planned Unit Development.

This is an attempt to manipulate the Dept's rules and regulations to allow the Heritage to treat Francisco Street as the rear and build to the property line with no curb cuts, landscaping, setbacks, or other design features that would otherwise be required. The Heritage already built the Perry Building in 1957 at the rear of its lot (nearest Octavia Street). To allow it to arbitrarily shift its parcel orientation by 90 degrees would be to allow Heritage to manipulate the Dept's rules and regulations to the detriment of the public interest with certain negative impacts to the surrounding residents.

8. **Variances, Waivers and Exceptions**

The building and its use are out of place in a residential neighborhood and should not be moved further out of conformity with the code and the neighborhood. The project will require a variety of waivers, and exceptions from code requirements for rear yard and exposure (units looking on to open space). Nonconforming uses should not be allowed to go further out of conformity and allowing such a result is directly at odds with the Planning Code and the General Plan.

CONCLUSION

The project description and description of the existing facility are not complete or accurate. The acquisition of the three adjacent apartment buildings must be taken into account, included in the description of the facility and the project, and resolved with the existing conditional use authorizations, the Planning Code, and the General Plan.

The negative environmental impacts of the proposal are numerous. The new proposed four-story buildings will overwhelm and overshadow the important historic resource of the Heritage's Julia Morgan mansion. The neighbors who live near the Heritage wish to continue a good relationship with the Heritage as their over-sized and out of place neighbor. However, the aggressive and startling proposal to increase the size of the facility by nearly 100% is not compatible with the neighborhood and is exactly why

neighbors opposed the Heritage with its first request for additions beginning back in the 1950's. Neighbors at all previous hearings on the conditional authorizations that keep Heritage in the neighborhood voiced fear and concern about future, unreasonable and unchecked expansion in a residential neighborhood. That is exactly what this proposal represents.

The neighbors are counting on the Dept to enforce the underlying policies of the Planning Code and General Plan as well as CEQA and its underlying spirit and purpose to protect the residential neighborhoods by requiring and suggesting mitigations which will reduce the overwhelming size and overwhelming impacts of the proposal.

Thank you for your consideration and attention to this matter.

Very Truly Yours,

STEPHEN M. WILLIAMS

From: Percy Yang
To: Poling, Jeanie (CPC)
Cc: Percy Yang
Subject: 3400 Laguna Street case # 2022-009819ENV
Date: Wednesday, November 15, 2023 2:32:54 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Jeanie,
We live 3 houses away from this buildout on Laguna, and we are very concerned about three important matters.

1. The height of the project and if it will impede the view from our units.
2. The parking conditions are already crowded, and additional buildouts will most certainly cause less available parking due to more visitors.
3. The traffic congestion coming through Laguna is already dangerously crowded at times, and more buildouts will add to more traffic and congestion.

Please confirm there will a height impediment, so that views will not be impacted, and the parking and traffic conditions will also not be impacted.

Regards,

Percy

Percy S. Yang

SUB-APPENDIX A.2
NOTICE OF PREPARATION (REISSUED MAY 8, 2024)

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San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

PUBLIC NOTICE

NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date:	November 1, 2023
Comment Deadline:	December 1, 2023
Case No.:	2022-009819ENV
Project Address:	3400 Laguna Street
Zoning:	RM-1 (Residential – Mixed, Low Density) Use District
Height/Bulk:	40-X District
Block/Lot:	0471/003
Lot Size:	68,005 square feet
Neighborhood:	Marina
Supervisor District:	District 2, Catherine Stefani
Cross Streets:	East side of Laguna Street between Bay and Francisco streets
Staff Contact:	Jeanie Poling – (628) 652-7559, jeanie.poling@sfgov.org

Introduction

The San Francisco Planning Department (department) prepared this notice of preparation of an environmental impact report (EIR) in connection with the proposed 3400 Laguna Street project (proposed project). The purpose of the EIR is to provide information regarding the physical environmental effects of the proposed project; identify possible ways to minimize any potentially significant adverse effects; and describe and analyze possible alternatives to the proposed project. The department is issuing this notice to inform the public and responsible and interested agencies about the proposed project and the intent to prepare an EIR; and to solicit comments on the scope of the EIR. This notice also identifies environmental issues anticipated to be analyzed in the EIR. The comments received during the public scoping process will be considered during preparation of the EIR for this project.[1]

This notice is available for public review on the department's website at sfplanning.org/sfceqadocs and at the San Francisco Permit Center's document viewing room on the second floor of 49 South Van Ness Avenue, San Francisco, CA 94103.

[1] The EIR will also be informed by comments received in response to the Planning Department's "Notification of Project Receiving Environmental Review" distributed on May 30, 2023. After that notice, the department determined to prepare an EIR.

Project Description

Project Location and Site Characteristics

The approximately 68,090-square-foot[2] (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The project site slopes upward from west to east from approximately 30 to 40 feet above mean sea level.

The project site has been occupied by the Heritage on the Marina residential care retirement community since 1925. Heritage on the Marina consists of five existing structures of approximately 83,200 gross square feet (gsf): the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage, which are further described below.[3]

- The **Julia Morgan Building** is a U-shaped building that is three stories and approximately 40 feet in height; it was built in 1925. The primary façade of the building faces west and is viewed from Laguna Street. The building has a partially exposed basement level and an attic story penthouse over the east portion of the front façade. The building serves as the primary pedestrian entrance to the site.[4]

- The **Perry Building Connector** is a rectangular building that is two stories and approximately 22 feet in height over a partially raised basement; it was built in 1957. The Perry Building Connector runs east to west to connect the Morgan Building to the Perry Building forming an L-shaped footprint.

- The **Perry Building** is a rectangular building that is four stories and approximately 41 feet in height over a partially raised basement; it was built in 1957. The building has an enclosed fire access stair on the Bay Street side that projects about 8 feet above the roofline and the existing elevator penthouse extends about 16 feet above the roofline.

- The **Health Center** is a rectangular building that is one story and approximately 15 feet in height; it was built in 1963. The Health Center runs east to west and intersects the Perry Building on its southeast corner.

- The **Caretaker's Cottage** is an L-shaped structure that is one story and 22 feet in height; it was built in 1925. It is located on the northeast corner of the property enclosed within a wood fence and gate.

The Morgan Building, the Perry Building Connector, the Perry Building, and the Health Center all surround a central courtyard. There is a second courtyard east of the Perry Building on the eastern boundary of the project site. The site also contains a front lawn that is located between the existing entrance to the Julia Morgan building and Laguna Street. (See **Figure 1, Project Vicinity Map** and **Figure 2, Existing Site Plan**).

The project site has approximately 45 feet of passenger loading (white curb) and 20 feet of accessible parking (blue curb) on the Laguna Street frontage and 22 feet of loading (white curb) on the Francisco Street

[2] All square footages are approximate and rounded to the nearest multiple of ten.
[3] Adjacent properties at 1530 Francisco Street, 1536-1538 Francisco Street, and 3325-3327 Octavia Street are also owned and operated by Heritage on the Marina but are not part of the project site and no changes to these facilities are proposed.
[4] Although this building serves as the primary pedestrian entrance to the site, it is non-compliant with Americans with Disabilities Act (ADA) accessibility requirements and the entrance along Francisco Street is instead used for ADA access.

frontage. The project site includes 17 off-street vehicle parking spaces and one off-street loading space, which are accessible via an existing 18-foot-wide driveway along Bay Street. Pedestrian access to the site is provided via gates along Laguna Steet that access internal sidewalks connecting to the Julia Morgan Building entrances and additional accessible entrances from Bay Street.

The project site is not listed in the National Register of Historic Places or the California Register of Historical Resources, nor is it a local San Francisco article 10 landmark, but the site is eligible for listing in the California Register of Historical Resources.

Proposed Project Characteristics

The proposed project would continue to operate as a residential care facility. The proposed project would demolish two of the five existing buildings (the Perry Connector and the Health Center) and construct two new buildings (the Bay Building and the Francisco Building) of heights not to exceed 40 feet in height (excluding rooftop appurtenances) and in the same locations as the demolished structures. The proposed project would also renovate two of the other three existing buildings on the site (the Perry Building and the Caretaker's Cottage), as further described below. In total, the proposed project would add approximately 58,380 square feet of net new institutional use resulting in an approximately 141,580 gsf residential care facility and increase the number of residential care suites by 23 from 86 to 109. **Table 1, Proposed Project Details** provides a summary of the proposed project compared to existing conditions.

Table 1 Proposed Project Details

	Existing	Proposed	Net Change
Number of Building(s)	5	5	0
Building Stories[1]	4	4	0
Maximum Building Height (feet)[1]	40	40	0
Building Gross Square Feet (gsf)	83,200	141,580	+58,380
Residential Care Units	86	109	+23
Useable Open Space (square feet)	26,410	30,280	+3,870
Off-Street Parking (spaces)	17	36	+19
Off-Street Loading Spaces	1	1	0
On-Street Loading Spaces	0	0	0

SOURCE: GBA Inc., 2023.

[1] Reflects the maximum building height and number of stories as these vary across the site.

NOTE: All gsf numbers are rounded to the nearest multiple of 10.

Gsf = gross square feet

Figure 3, Proposed Site Plan depicts the overall proposed site plan; **Figures 4 through 7** depict the proposed floor plans for the basement, ground floor, representative upper floors (level 2); and roof levels. **Figures 8 through 9** depict the proposed building elevations.

New Construction

The new Bay Building and new Francisco Building would both be four stories and approximately 40 feet in height. The new Bay Building would be approximately 31,300 gross square feet and include a resident's roof

deck, independent living units, assisted living amenities, memory support accommodations, reception, lounge, administration and laundry. The new Francisco Building would be approximately 47,100 gross square feet and include independent living units, support areas (fitness, physical therapy, arts and crafts) and staff facilities.

The proposed new Bay Building and new Francisco Building would have flat roofs at similar elevation as the Perry Building. The new Bay Building also would include a roof deck consisting of 3,549 square feet of common open space surrounded by perimeter planters and positioned on the Bay Street side of the project site away from neighboring residences. The roof deck would be serviced by two elevators (service elevator and passenger elevator) with a small shade trellis (approximately 500 square feet). The new elevators would have penthouses that would be shorter than the existing Perry Building elevator penthouse. Three new staircases would be added to access the roof. None of the permitted obstructions would be taller than the existing roof access stair projection of the existing Perry Building. The Bay Building's new staircase would be adjacent to the internal courtyard, as would one of the Francisco Building's two staircases. The other stair for the Francisco Building located at the building's southeast corner would utilize a sloped roof condition consistent with the design guidelines.

To meet CALGreen[5] requirements, the project would utilize a mechanical system which requires use of rooftop HVAC compressors. The system has not been designed, but the compressors can range from 4 to 10 feet in height above the roof level (depending on the system design). The compressors would be grouped together in screened enclosures, as far away as practical from the roof perimeter along the adjoining streets. The screen enclosure height would match the equipment height. In addition, about a third of roof area not occupied by the roof terrace/mechanical equipment would host a solar panel array. The panels would have a tilt to optimize performance but would not project appreciably above adjacent parapets. The proposed project would decrease the total roof area from 34,360 square feet to 31,930 square feet to accommodate the solar panels; new buildings would meet Title 24 requirements for photovoltaic solar panels on building flat roof areas.

The existing emergency backup diesel power generator, located adjacent to the Bay Street frontage, would be replaced by a new Tier 4 emissions emergency backup diesel generator located inside the new Bay Building.

A new basement level garage would be constructed beneath the Bay and Francisco buildings and the existing interior courtyard. The basement level would include 31 vehicular parking spaces for use by staff and residents, including one car-share space, and 18 bicycle parking spaces. A new two-directional, 20-foot-wide driveway on Bay Street would provide access to the new basement, east of the existing entrance. Vehicles would be restricted to right-only turns into and out of the driveway. The new driveway would necessitate the removal of the 17 existing project site surface parking spaces and approximately 15 feet of street parking along Bay Street. At this location, along the Bay Street side of the project site, an off-street covered porte cochère with zero curbs and accessibility ramps would provide universal access required by the residential care facility. The existing driveway on Bay Street, west of the new driveway, would provide access to five project site surface parking spaces. In total, the project would add 19 net new parking spaces to the project site. The proposed project would also add 12 new bicycle parking spaces in the public right-of-way (three located on Bay Street and nine located on Francisco Street).

[5] CalGreen is the California Green Buildings Standards Code, Part 11, Title 24, California Code of Regulations.

Changes to Existing Buildings

The proposed project would:

- renovate the interior of the existing Caretaker's Cottage,
- renovate the interior and exterior of the existing Perry Building, and
- rehabilitate the façade of the existing Julia Morgan Building, including window repairs and replacements, fencing repairs including to the brick base, HVAC modernization, re-pointing[6] of bricks where needed, and roof repairs where needed.

There would be no change to the building massing, number of stories or height of the Julia Morgan Building, Perry Building, and the Caretaker's Cottage.

Open Space

The project would increase usable open space at the project site from approximately 26,410 square feet to approximately 30,280 square feet, an increase of approximately 3,870 square feet of open space. The proposed project would preserve the existing open lawn space in front of the Julia Morgan Building and in the courtyard to the rear of the project site. The proposed project would renovate and augment the size of the original central courtyard and would install an adjoining courtyard on the same level. The proposed project would also create an art garden in the approximate location of the existing garden at the southwest portion of the project site. Additionally, the project would add 3,550 square feet of common open space and 940 square feet of green area on the roof of the new Bay Building.

Demolition and Construction

Construction of the project would take approximately 29 months. The proposed new buildings would be constructed on mat foundations, and no impact or vibratory pile driving techniques would be used. The proposed project would require the excavation of 9,060 cubic yards of soil to a maximum depth of 15 feet below ground surface. The total area of soil disturbance would be 29,750 square feet. Construction is scheduled for Monday through Friday, from 7:00 a.m. to 8:00 p.m., with no nighttime construction to occur.

Project Approvals

The proposed project requires the following approvals from the San Francisco Planning Commission: Conditional Use Authorization (planning code sections 209.2 and 303); and Planned Unit Development, including an exception to a rear yard requirement (planning code section 304).

Summary of Potential Environmental Issues

The proposed project could result in potentially significant environmental effects. Therefore, the department will prepare an initial study and EIR to evaluate the physical environmental effects of the proposed project. The initial study will be published as an appendix to the draft EIR and will be part of the EIR.

As required by the California Environmental Quality Act (CEQA), the EIR will further examine those issues identified in the initial study as having potentially significant effects or may be topics of significant controversy, identify mitigation measures, analyze whether the proposed mitigation measures would reduce

[6] Re-pointing refers to replacing and sealing failed joints with new mortar.

the environmental effects to less-than-significant levels, and identify feasible alternatives to the proposed project that would reduce those impacts.

The EIR (including the initial study) will be prepared in compliance with CEQA (California Public Resources Code, sections 21000 et seq.), the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The EIR is an informational document for use by governmental agencies and the public to aid in the planning and decision-making process. The EIR will disclose any physical environmental effects of the proposed project and identify possible ways of reducing or avoiding potentially significant impacts.

The EIR will evaluate the environmental impacts of the proposed project resulting from construction and operational activities, and will propose mitigation measures to reduce or avoid impacts determined to be significant. The EIR will also identify potential cumulative impacts that consider impacts of the proposed project in combination with impacts of other past, present, and reasonably foreseeable future projects. The EIR (including the initial study) will address all environmental topics in the department's CEQA environmental checklist; at this time, topics marked with an asterisk (*) are anticipated to be included for full analysis in the EIR:

- Land Use and Planning
- Aesthetics*
- Population and Housing
- Cultural Resources*
- Tribal Cultural Resources
- Transportation and Circulation
- Noise
- Air Quality*
- Greenhouse Gas Emissions
- Wind
- Shadow
- Recreation
- Utilities and Service Systems
- Public Services
- Biological Resources
- Geology and Soils
- Hydrology and Water Quality
- Hazards and Hazardous Materials
- Mineral Resources
- Energy
- Agriculture and Forestry Resources
- Wildfire

Finding

This project may have a significant effect on the environment, and an EIR will be prepared. This determination is based on the criteria of the state CEQA Guidelines, sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance). The purpose of the EIR is to provide information about potential significant physical environmental impacts of the proposed project, and identify possible ways to minimize any significant impacts. The EIR also describes and analyzes possible alternatives to the proposed project. The EIR will also discuss other topics required by CEQA, including significant unavoidable impacts and significant irreversible impacts, and known controversy associated with the project and its environmental effects, and issues to be resolved by decision-makers.

Preparation of an NOP or EIR does not indicate a decision by the City and County of San Francisco to approve or disapprove a proposed project. However, prior to making any such decision, the decision-makers must review and consider the information contained in the EIR.

Public Scoping Comments

The department welcomes your comments concerning potential environmental effects of this project. Written comments will be accepted until **5 p.m. on December 1, 2023**. Written comments should be sent to Jeanie Poling, San Francisco Planning Department, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103, or emailed to jeanie.poling@sfgov.org and should reference the project title and case number on the front of this notice.

State Agencies: If you work for a responsible state agency, we need to know the views of your agency regarding the scope and content of the environmental information that are germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in our agency. If you have questions concerning the environmental review of the proposed project, please contact Jeanie Poling at 628-652-7559 or jeanie.poling@sfgov.org.

Members of the public are not required to provide personal identifying information when they communicate with the planning commission or the department. All written or verbal communications, including submitted personal contact information, may be made available to the public for inspection and copying on request, and may appear on the department's website or in other public documents.

Recipients of this notice are encouraged to pass on this information to others who may have an interest in the project.

Dewyani Jain for Lisa Gibson

November 1, 2023

By Lisa Gibson
Environmental Review Officer

Date

cc: Catherine Stefani, District 2 Supervisor



FIGURE 1

N

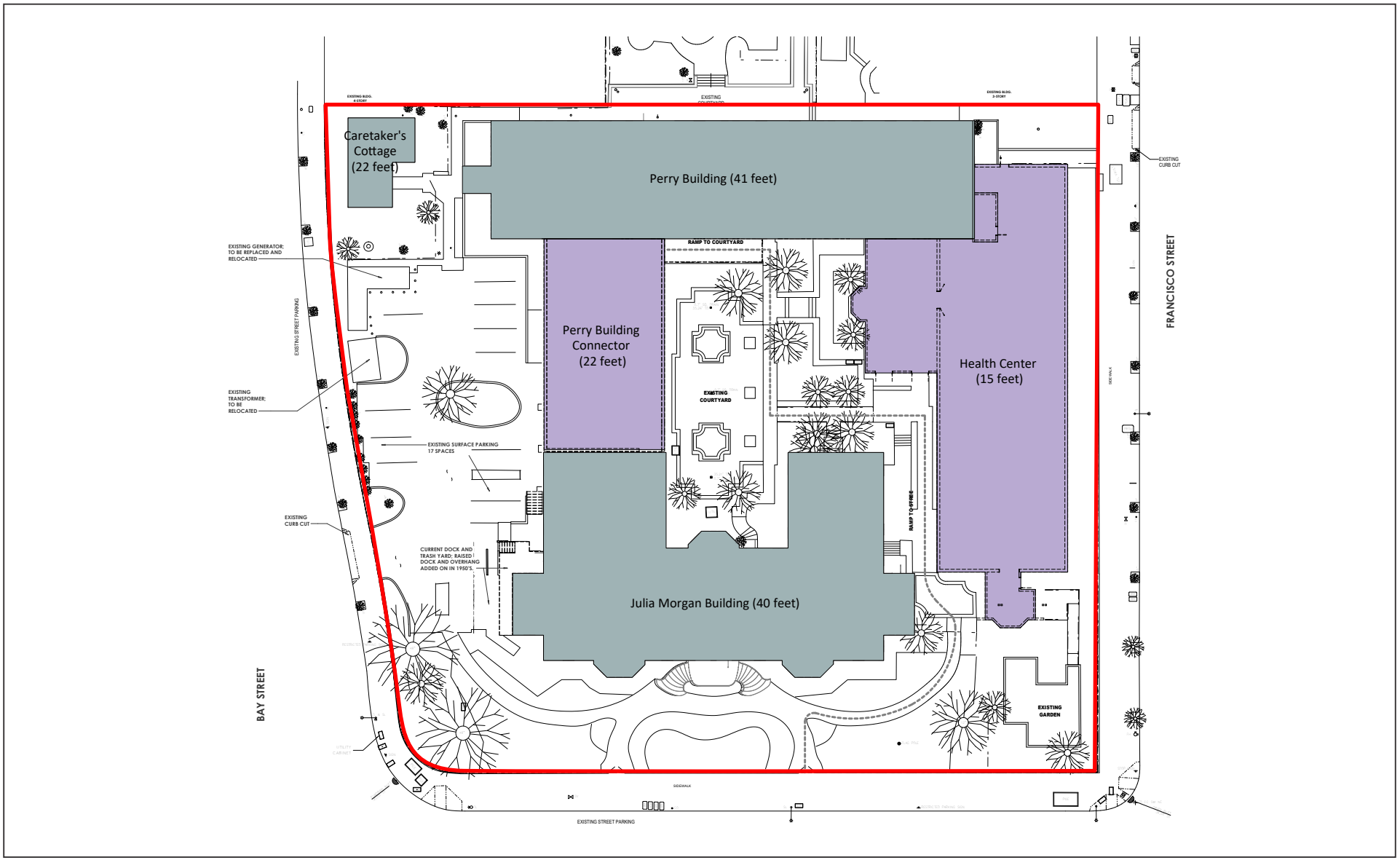
0 1000 2000
FEET

SOURCE: ESRI Street Map, 2023

J:\20230999\G\Project_Location.ai (10/24/2023)

3400 Laguna Street Project

Project Location



LEGEND

- Project Area
- Area of Modified Landscape
- Building to be Demolished
- Building to Remain Interior Renovation Only
- Accessible Path of Travel

FIGURE 2

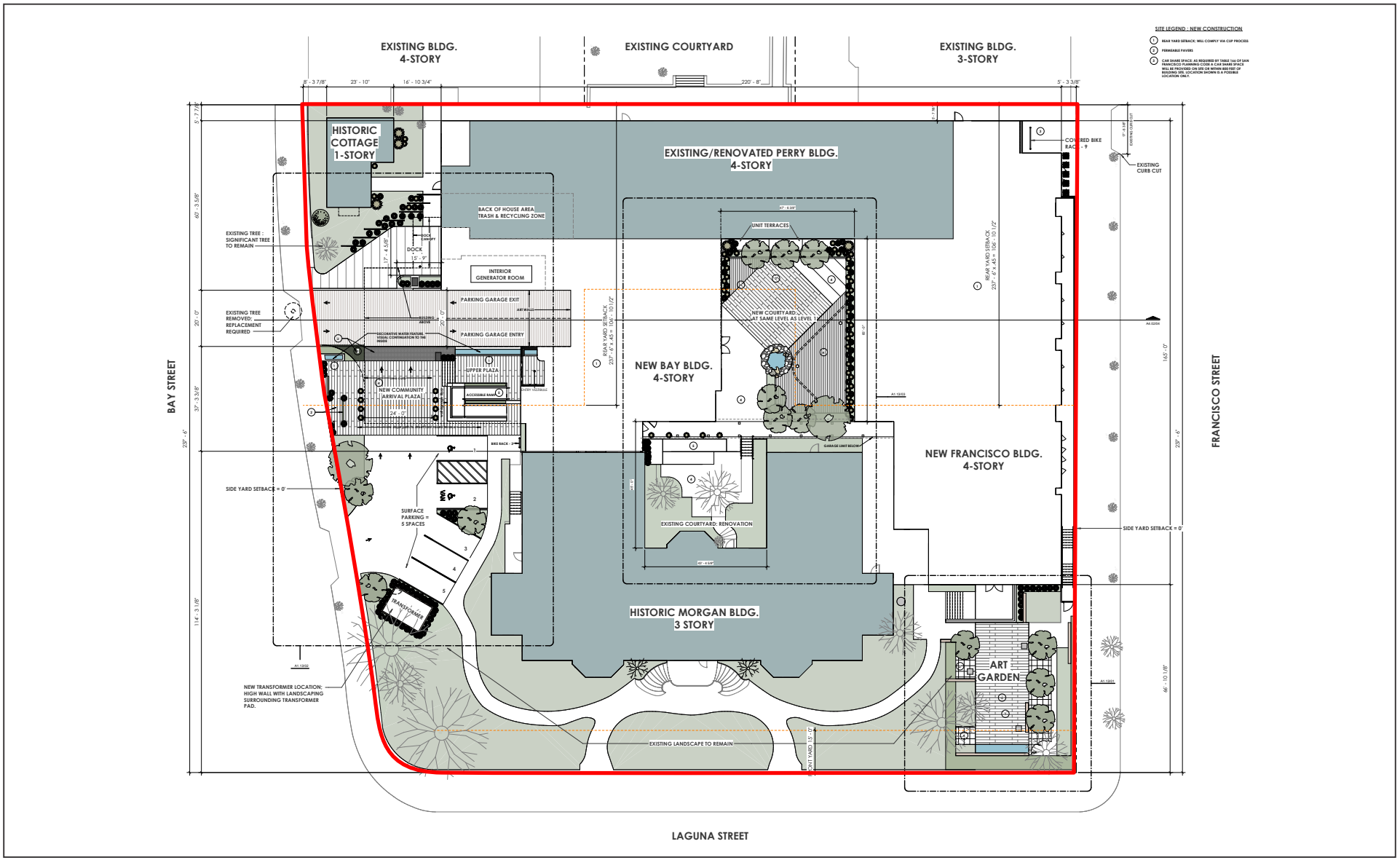
NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Existing Site Plan

J:\20230999\G\Existing_Site_Plan.ai (10/24/2023)



LEGEND

Project Area

FIGURE 3

0 25 50

FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Site Plan

J:\20230999\G\Proposed_Site_Plan.ai (10/26/2023)

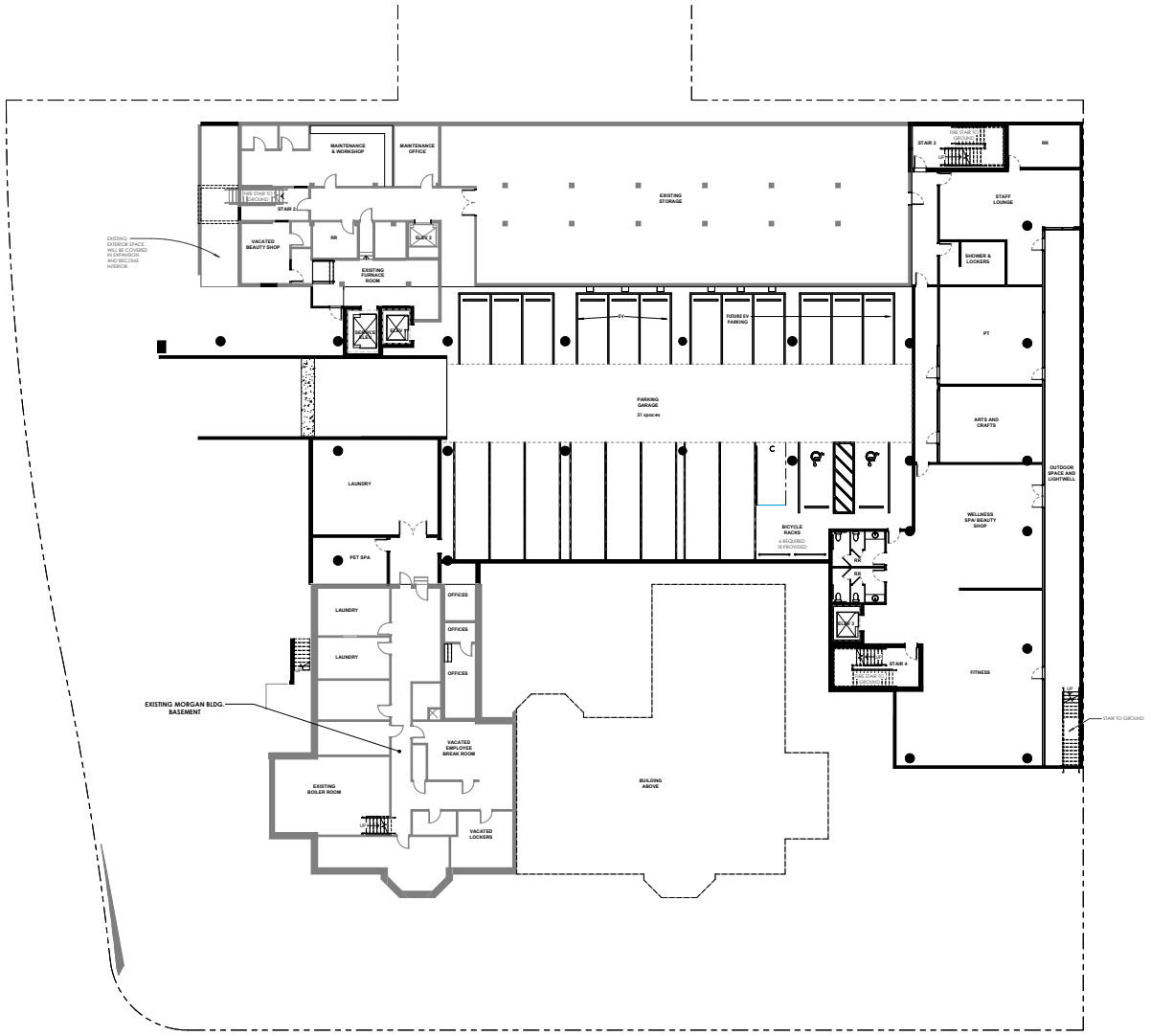


FIGURE 4

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Basement

J:\20230999\G\Proposed_Floor_Plan_Basement.ai (10/26/2023)

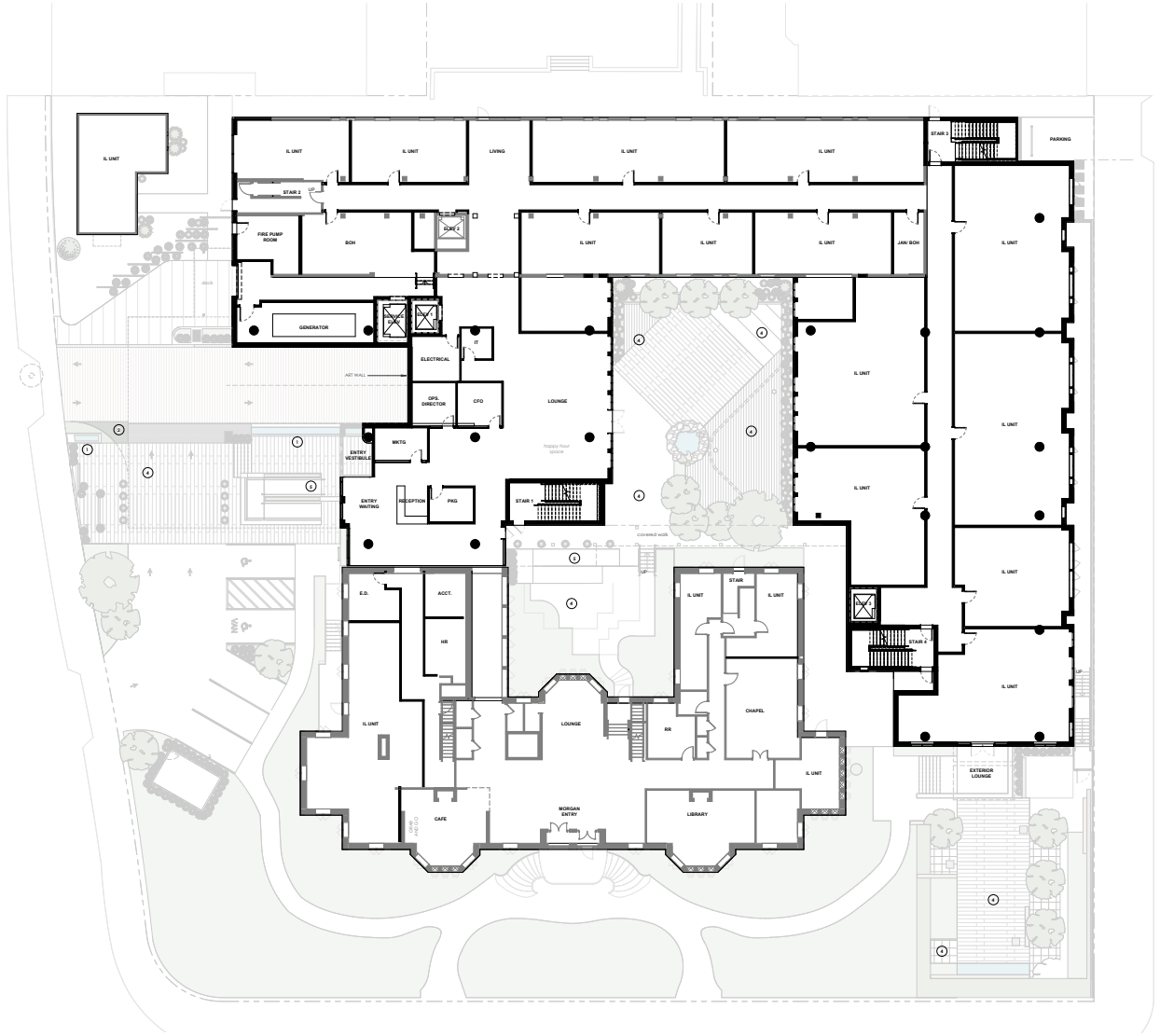


FIGURE 5

NO SCALE

SOURCE: HKS, Inc.

3400 Laguna Street Project

Proposed Floor Plan – Level 1

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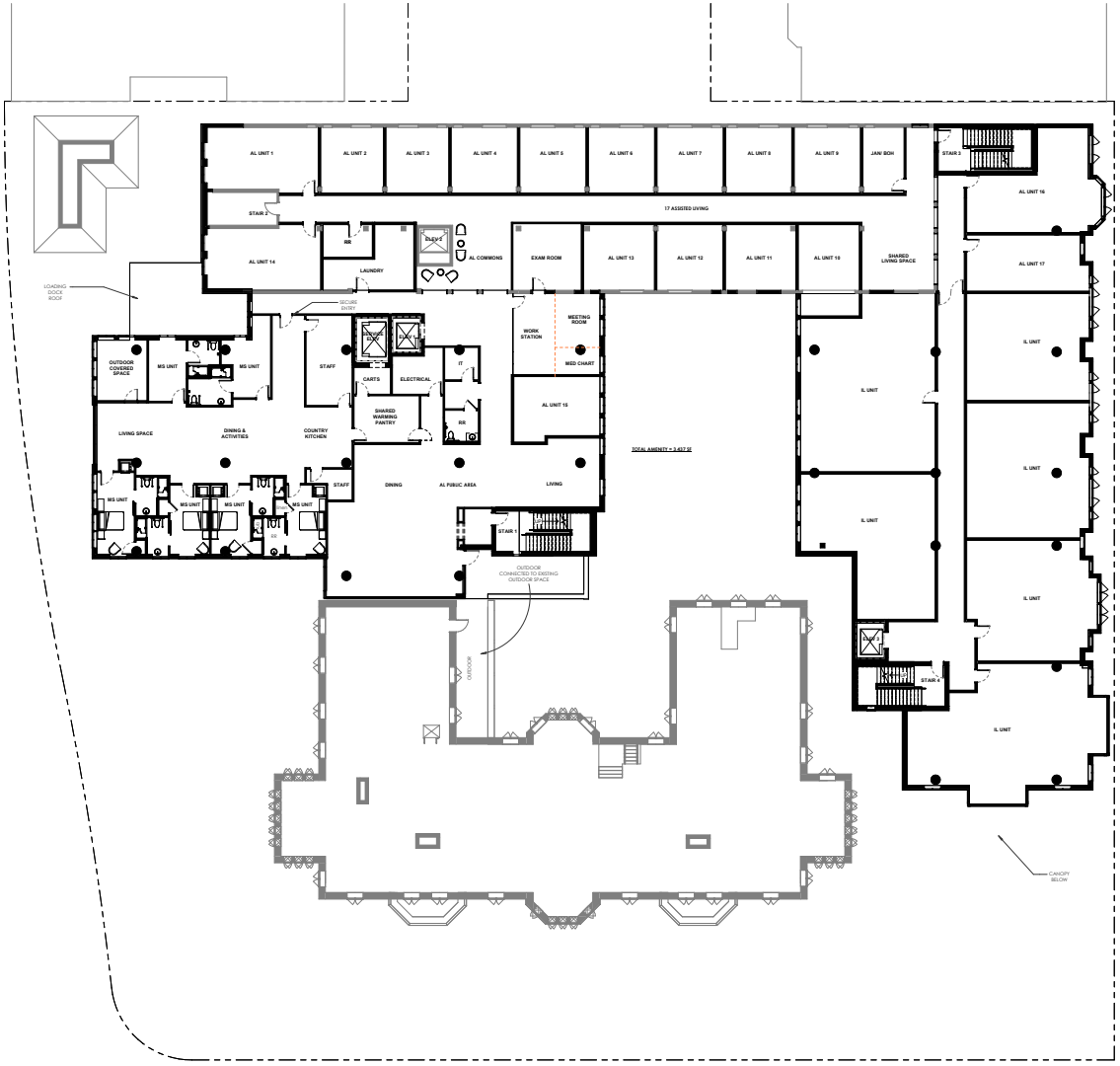


FIGURE 6

NO SCALE

SOURCE: HKS, Inc.

J:\20230999\G\Proposed_Rep_Upper_Floor_Plans_Level2.ai (10/26/2023)

3400 Laguna Street Project

Representative Upper Floor Plan – Level 2

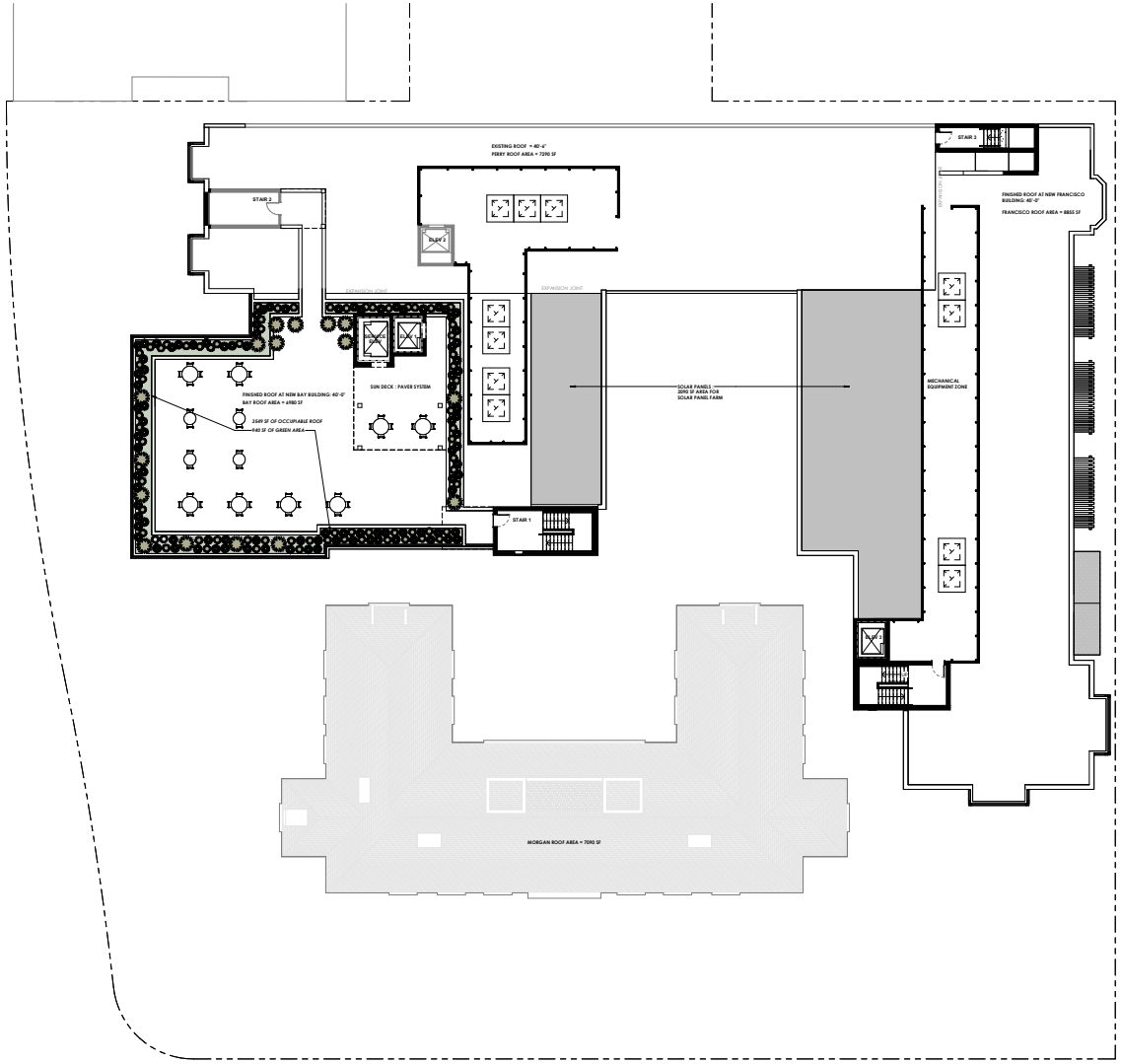


FIGURE 7

NO SCALE

SOURCE: HKS, Inc.

J:\20230999\G\Proposed_Roof_Plan.ai (10/26/2023)

3400 Laguna Street Project

Proposed Roof Level Plan



FIGURE 8

0 15 30
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – North and South

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East Elevation



West Elevation

FIGURE 9

0 17.5 35
FEET

SOURCE: HKS, Inc.

3400 Laguna Street Project
Proposed Elevations – East and West

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State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
(707) 428-2002
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

May 24, 2024

Megan Calpin, Senior Planner
City and County of San Francisco
49 South Van Ness Avenue #1400
San Francisco, CA 94103
Megan.Calpin@sfgov.org

Subject: 3400 Laguna Street Project, Notice of Preparation of a Draft Environmental Impact Report, SCH No. 2024050241, City and County of San Francisco

Dear Megan Calpin:

The California Department of Fish and Wildlife (CDFW) reviewed the City and County of San Francisco (City) Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the 3400 Laguna Street Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines[1] .

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the state. Please be advised, by law, CDFW may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW is providing the City, as the Lead Agency, with specific detail about the scope and content of the environmental information related to CDFW's area of statutory responsibility that must be included in the draft EIR (See: Cal. Code Regs., tit. 14, § 15082, subd. (b)).

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in "take" as defined by state law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION AND LOCATION

Proponent: Mary Linde, Heritage on the Marina

Location: The Project site is located at 3400 Laguna Street on a 1.6-acre corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The Project site has been occupied by the Heritage on the Marina residential care retirement community since 1925. The Heritage on the Marina consists of five existing structures of approximately 83,200 gross square feet (APN 0471 -003).

Description: The Project proposes to continue operating as a residential care facility and demolish two of the five existing buildings (the Perry Connector and the Health Care Center) and construct two new buildings (the Bay Building and the Francisco Building) of heights not to exceed 40 feet and in the same locations as the demolished structures. The proposed Project would renovate two of the other three existing buildings on the site and make improvements to the Julia Morgan Building. The Project proposes to add approximately 58,380 square feet of institutional use and increase the number of residential care suites by 23 from 86 to 109.

The CEQA Guidelines (§§15124 & 15378) require that the draft EIR incorporate a full Project description, including reasonably foreseeable future phases of the Project, and that contains sufficient information to evaluate and review the Project's environmental impact. Please include a complete description of the following Project components in the Project description including, but not limited to the below information.

Land use changes resulting from, for example, rezoning in certain areas.

- Footprints of permanent Project features and temporarily impacted areas, such as staging areas. and access routes.

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- Area and plans for any proposed buildings/structures, ground-disturbing activities, fencing, paving, stationary machinery, landscaping, and stormwater systems.

- Operational features of the Project, including level of anticipated human presence (describe seasonal or daily peaks in activity, if relevant), artificial lighting/light reflection, noise, traffic generation, and other features.

- Construction schedule, activities, equipment, and crew sizes.

ENVIRONMENTAL SETTING

Sufficient information for meaningful review regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the draft EIR (CEQA Guidelines, §§ 15125 & 15360). CDFW recommends the draft EIR provide baseline habitat assessments for special-status plant, fish, and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, §15380). The draft EIR should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities), and any stream or wetland set back distances the City may require.

Candidate and other special-status species that are known to occur, or have the potential to occur, in or near the Project site include, but are not limited to:

Common Name	Scientific Name	Federal Status[2]	State Status[3]	CDFW Status
American peregrine falcon	*Falco peregrinus anatum*	Delisted	Delisted	-
monarch - California overwintering population	*Danaus plexippus plexippus pop. 1*	FC	-	-
obscure bumble bee	*Bombus caliginosus*	-	-	-
western bumble bee	*Bombus occidentalis*	-	SC	-

Habitat descriptions and species profiles included in the draft EIR should include robust

[2] FC = federal candidate for listing under ESA.
[3] SC = state candidate for listing endangered under CESA.

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information from multiple sources: aerial imagery, historical and recent survey data, field reconnaissance, scientific literature and reports, U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDB). Only with sufficient data and information from the habitat assessment can the City adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends that prior to Project implementation, surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: https://wildlife.ca.gov/Conservation/Survey-Protocols.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (http://www.cnps.org/cnps/rareplants/inventory/), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to special-status plants available at: https://wildlife.ca.gov/Conservation/Plants.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines necessitate the draft EIR, discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. (CEQA Guidelines, § 15126.2.). This includes evaluating and describing impacts such as:

- Potential for "take" of special-status species;
- Loss of trees;
- Loss or modification of breeding, nesting, dispersal, and foraging habitat, including vegetation removal, alternation of soils and hydrology, and removal of habitat structural features (e.g. snags, roosts);
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic, or human presence;
- Water quality impacts resulting from construction and operation of the Project;
- Impacts both from construction and operation of the Project; and
- Impacts to bed, channel, bank, and riparian habitat, and the direct and indirect effects to fish, wildlife, and their habitat.

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The draft EIR should also identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, § 15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the City, as the Lead Agency, to consider and describe in the draft EIR all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include discussion of take avoidance and minimization measures for special-status species, which should be developed in consultation with the USFWS, the National Marine Fisheries Service, and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." (Fish & G. Code, § 86.) CDFW's issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent's obligation to comply with the Fish and Game Code.

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Lake and Streambed Alteration Agreement

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

ENVIRONMENTAL DATA

CEQA requires that information developed in EIRs and negative declarations be incorporated into a database which may be used to prepare subsequent EIRs or to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subds. (d) & (e).) Accordingly, please report any special-status species and natural communities detected during Project surveys to CNDDB. The CNDDB online field survey form and other methods for submitting data can be found here: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data.

The types of information reported to CNDDB can be found here: https://wildlife.ca.gov/Data/CNDDB/Plants-and-Animals.

FILING FEES

CDFW anticipates that the proposed Project will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable

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upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to provide comments on the proposed Project to assist the City in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Jason Teichman, Environmental Scientist at Jason.Teichman@wildlife.ca.gov; or Wesley Stokes, Senior Environmental Scientist (Supervisory), at Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
B77E9A6211EF486...

Erin Chappel
Regional Manager
Bay Delta Region

ec: Craig Weightman, CDFW Bay Delta Region - Craig.Weightman@wildlife.ca.gov

APPENDIX B
INITIAL STUDY

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San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

INITIAL STUDY
3400 LAGUNA STREET

Date:	August 28, 2024
Case No.:	2022-009819ENV
Project Address:	3400 Laguna Street
Zoning:	RM-1 (Residential – Mixed, Low Density) Use District
Height/Bulk:	40-X District
Block/Lot:	0471/003
Lot Size:	68,090 square feet
Neighborhood:	Marina
Project Sponsor:	Mary Linde, CEO, Heritage on the Marina – (415) 202-0343, MLinde@heritagesf.org
Staff Contact:	Megan Calpin – (628) 652-7508, CPC.3400LagunaEIR@sfgov.org

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ACRONYMS AND ABBREVIATIONS

ABAG	Association of Bay Area Governments
ADA	Americans with Disabilities Act
ADRP	Archeological Data Recovery Plan
air basin	San Francisco Bay Area Air Basin
air district	Bay Area Air Quality Management District
AMP	Archeological Monitoring Plan
ARPP	archeological resource preservation plan
ARR	Archeological Resources Report
BWDP	Batch Wastewater Discharge Permit
CALGreen	California Green Buildings Standards Code
California air board	California Air Resources Board
California Register	California Register of Historical Resources
Caltrans	California Department of Transportation
CAP	climate action plan
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CNDDB	California Natural Diversity Database
CO	carbon monoxide
CRPIP	Cultural Resources Public Interpretation Plan
dBA	A-weighted decibels
DPM	diesel particulate matter
EIR	environmental impact report
ERO	Environmental Review Officer
ESLs	environmental screening levels
FAR	floor area ratio
FTA	Federal Transit Administration
FUDS	Formerly Used Defense Site
GHG	greenhouse gas
health department	San Francisco Department of Public Health

HEPA	High Efficiency Particulate Air Filter
HRR	Historic Resources Response
in/sec	inches per second
L_{dn}	day-night average noise level
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent continuous sound level
LUST	leaking underground storage tank
MBTA	Migratory Bird Treaty Act
Medical Examiner	Office of the Chief Medical Examiner of the City and County of San Francisco
mgd	million gallons per day
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
PCE	tetrachloroethene
PG&E	Pacific Gas & Electric
PM	particulate matter
PM_{10}	particular matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PPV	peak particle velocity
QACL	Qualified Archeological Consultants List
RM-1	Residential-Mixed, Low Density
ROG	reactive organic gases
SF Guidelines	San Francisco Transportation Impact Analysis Guidelines for Environmental Review
SFMTA	San Francisco Municipal Transportation Agency
SFPUC	San Francisco Public Utilities Commission
SO_2	sulfur dioxide
TACs	toxic air contaminants

TCE	trichloroethene
TCRPP	tribal cultural resource preservation plan
TDM	Transportation Demand Management
TIA	Federal Transit Administration
TNCs	transportation network companies
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compounds

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A. PROJECT DESCRIPTION

The 3400 Laguna Project (proposed project) is described in 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, Project Description. The cumulative setting is provided in EIR Chapter 3, Environmental Settings and Impacts, Section 3.A.

The only reasonably foreseeable cumulative project within approximately one-quarter mile of the project site is the Marina Improvement and Remediation Project, described in EIR Chapter 3, Environmental Setting, Section 3.A.5.

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.	☒	☐
Discuss any conflicts with any adopted plans and goals of the City or region, if applicable.	☐	☒
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.	☒	☐

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 below in Section E, Evaluation of Environmental Effects, or in the draft EIR, as appropriate.

The proposed project would demolish existing buildings, construct new buildings, and renovate existing buildings on an urban infill site and would continue to operate as a residential care facility.

Comments received in response to the Notice of Preparation (NOP) regarding the proposed project's compatibility with zoning and plans included concerns regarding the project's consistency with City policies related to preservation of affordable housing, concerns that the project does not contribute to the City's equitable housing stock and therefore does not support the City housing goals and policies, maintenance of the character of the Marina neighborhood, and inconsistency with the current allowable land use. These comments also raised concerns that the project would violate the currently approved conditional use permit due to the increased density of residential units. A number of permits and approvals from City departments are required as identified in Chapter 2, Project Description of the EIR. To the extent that there are conflicts between the proposed project and applicable plans, policies, and regulations, those conflicts would be

considered by City decision-makers when they decide whether to approve, modify, or disapprove the proposed project.

San Francisco Planning Code and Zoning Maps

The San Francisco Planning Code, which incorporates by reference the City's zoning maps, governs permitted uses, densities, and the configuration of buildings within San Francisco.[1] Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless: (1) the proposed project complies with the planning code, (2) an allowable exception or variance is granted, or (3) legislative amendments to the planning code are included and adopted as part of the proposed project.

Land Use

The project site is currently occupied by the approximately 83,200-gross-square-foot Heritage on the Marina residential care facility, which has been operating at the site since 1925. The project site is located within the RM-1 (Residential-Mixed, Low Density) zoning district. As stated in planning code section 209.2, RM (Residential, Mixed) Districts, the RM-1 zoning districts have a low overall density of units, buildings are moderately scaled and segmented, and units or groups of units have separate entrances. Residential care facilities are defined by the planning code as an institutional health care use providing lodging, board and care for persons in need of specialized aid by personnel licensed by the State of California and are a permitted institutional use within the RM-1 district. The facility currently operates under a Conditional Use Permit and Planned Unit Development approved in 1986, when the facility was last expanded.

The proposed expansion and modernization of the existing residential care facility to provide an additional 23 residential care suites through demolition of two existing buildings and construction of two new buildings would be consistent with the intent of the RM-1 district. The proposed project includes a request for a conditional use authorization from the planning commission pursuant to planning code sections 209.2 and 303, Conditional Uses as well as approval of Planned Unit Development, including an exception to the rear yard requirement pursuant to planning code section 304, Planned Unit Developments.

Height and Bulk

The project site is located within the 40-X height and bulk district. The 40-X height and bulk district permits a maximum building height of 40 feet, with an additional 16 feet for mechanical equipment and rooftop appurtenances such as elevator penthouses (a total of 56 feet). Pursuant to planning code section 270(a), Bulk Limits: Measurement, there are no bulk controls in an "X" district. The proposed project would not include new construction or exterior alterations that would increase the building height on the site beyond the 40 foot height limit and all rooftop equipment and appurtenances would be below 56 feet; therefore, the proposed project complies with the height and bulk limits specified in the planning code for the project site.[2]

Floor Area Ratio

Floor area ratio (FAR) is a measure of building intensity based on the ratio between the total floor area to be built on a site and the size of that site. In the RM-1 district, a basic 1.8:1 FAR is allowed. Given that the site is on a corner lot, the FAR premium allowing a 25 percent increase applies pursuant to planning code section 125, Floor Area Premiums. The proposed project, which would increase the total building size on the site to

[1] San Francisco Planning Code, available at https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_planning/0-0-0-17747, accessed May 16, 2024.

[2] The existing Perry Building is 40.5 feet tall (rounded to 41 feet tall) and no changes to this building's height are proposed. The new Bay and Francisco building heights would not exceed 40 feet.

141,580 square feet, would have a FAR of 2.08:1 and would comply with the maximum FAR requirement of 2.25:1 for the project site.

Setbacks and Yards

Pursuant to planning code section 209.2, the proposed project is required to provide a rear yard of 30 percent of the lot depth, but in no case less than 15 feet shall be provided, whichever is greater. The proposed project would not provide a compliant rear yard and therefore would require a planned unit development exception under planning code section 304. No side yards are required and no changes would be made to the front setback.

Parking and Loading

Pursuant to planning code section 151, Schedule of Required Off-Street Parking Spaces, no off-street parking is required for a residential care facility in the RM-1 district and the maximum number of parking spaces would be 49 spaces, or one space per 2,000 square feet of Occupied Floor Area.[3] The basement-level garage would include 31 vehicular parking spaces for use by staff and residents, including one car-share space. Five surface off-street parking spaces would also be provided on the site. In total, the project would add 19 off-street parking spaces to the project site, for a total of 36 spaces, which is less than the maximum allowed. A new two-directional, 20-foot-wide driveway on Bay Street would provide access to the new basement-level garage, east of the existing entrance. Vehicles would be restricted to right-only turns into and out of the driveway. The new driveway would necessitate the removal of the 17 existing off-street surface parking spaces and approximately 15 feet of on-street parking along the project's Bay Street frontage, resulting in the loss of one on-street parking space on Bay Street. The existing driveway will remain as an ingress only, one-directional access to the covered porte cochère and the five surface off-street parking spaces. The project would also provide one off-street freight loading space, accessible via Bay Street. Pursuant to planning code section 152, Schedule of Required Off-Street Freight Loading Spaces, one off-street freight loading space is required.

The basement garage would include 18 Class 1 bicycle parking spaces, none are required pursuant to planning code section 155.2, Bicycle Parking: Applicability and Requirements for Specific Uses. For residential care facilities, planning code section 155.2 requires two Class 2 bicycle spaces for every 50 units or beds; the proposed project would include 109 residential care units and thus require 6 Class 2 bicycle parking spaces. The project would provide 12 Class 2 bicycle parking spaces in the public right-of-way (three located on Bay Street and nine located on Francisco Street) and three Class 2 bicycle parking spaces on the surface parking lot.

Trees

The public right-of-way adjacent to the project site contains 14 existing street trees, with five street trees present along the Bay Street frontage and nine trees present along the Francisco Street frontage. The proposed project would remove one street tree along the Bay Street Frontage. The proposed project would replace the tree along the Bay Street frontage and add six street trees along the project site's Laguna Street frontage in accordance with section 806 of the public works code. The proposed project would result in a net increase of six street trees. The project site contains one significant tree, as defined in section 810A of the public works code, that would not be removed.

[3] The occupied floor area of the proposed project, as defined by planning code section 102, would be 98,424 square feet.

Plans and Policies

San Francisco General Plan

The general plan establishes objectives and policies to guide land use decisions related to the physical development of San Francisco. It is comprised of 10 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 conflicts between the proposed project and policies that relate to physical environmental issues are discussed in Section E, Evaluation of Environmental Effects or in the draft EIR. The compatibility of the proposed project with general plan policies that do not relate to physical environmental issues will be considered by decisionmakers as part of their decision whether to approve or disapprove the proposed project. The proposed project would result in the expansion and renovation of an existing residential care facility through the demolition of two existing buildings and construction of two new buildings, as well as renovation of the Julia Morgan Building and Perry Building. It would not introduce incompatible land uses to the neighborhood. The project would not otherwise conflict with any general plan policies or objectives. Thus, the project would not be inconsistent with the San Francisco 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, General Plan Consistency and Implementation, to the planning code and established eight priority policies. These policies, and the topics in Section E, Evaluation of Environmental Effects or in the draft EIR, 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; (4) discouragement of commuter automobiles; (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.16(a) through E.16(d), Geology and Soils); (7) preservation of landmark and historic buildings (Section 3.B, Historic Resources, of the draft EIR); and (8) protection of open space (Section E.10, Wind; Section E.11, Shadow; Section E.12(a), Recreation; and Section E.14, Public Services). Prior to issuing a permit for any project that requires an initial study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the general plan, the City is required to find that the proposed project would be consistent with the priority policies.

As noted above, 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 as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of that process would not alter the physical environmental effects of the proposed project.

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 Bay Area 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 project could potentially result in significant adverse physical effects on the environmental resource topics checked below. Where those impacts are significant or potentially significant, CEQA requires identification of mitigation measures to reduce the severity of the impacts to a less-than-significant level to the extent feasible. This initial study presents a more-detailed checklist and discussion of each environmental resource, unless otherwise noted below.

- ☐ Land Use and Planning
- ☐ Aesthetics
- ☐ Population and Housing
- ☒ Cultural Resources
- ☒ Tribal Cultural Resources
- ☐ Transportation and Circulation
- ☒ Noise
- ☒ Air Quality
- ☐ Greenhouse Gas Emissions
- ☐ Wind
- ☐ Shadow
- ☐ Recreation
- ☐ Utilities and Service Systems
- ☐ Public Services
- ☒ Biological Resources
- ☐ Geology and Soils
- ☐ Hydrology and Water Quality
- ☐ Hazards and Hazardous Materials
- ☐ Mineral Resources
- ☐ Energy
- ☐ Agriculture and Forestry Resources
- ☐ Wildfire
- ☒ Mandatory Findings of Significance

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 with mitigation incorporated," "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. A discussion is included for those topics checked "less than significant with mitigation incorporated" and "less-than-significant impact," and for most items checked with "no impact" or "not applicable." 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. Impacts identified as "potentially significant" are analyzed in the EIR or were evaluated in this initial study and found to be significant, but mitigation measures identified in this initial study and agreed to by the project sponsor would reduce those impacts to less-than-significant levels. The "potentially significant" designation used to identify topics that are addressed in detail in the EIR does not reflect a determination that the proposed project would in fact result in a significant impact related to the particular topic. Such topics 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.

Effects Found to Be Potentially Significant

On the basis of this initial study, topics for which there are project-specific effects that have been determined potentially significant are:

- Cultural resources (historic architectural and cumulative historic architectural resources)
- Air quality (construction criteria air pollutant emissions, health risks to receptors, and cumulative health risks)

These environmental topics are evaluated in the EIR prepared for the proposed project.

Effects Found Not to Be Significant or Not Significant with Identified Mitigation Measures

The following potential individual and cumulative environmental effects would be less than significant or reduced to a less-than-significant level through implementation of identified mitigation measures included in this initial study and agreed to by the project sponsor:

- Land use and planning
- Population and housing
- Cultural resources (archeological resources and human remains)
- Tribal cultural resources
- Transportation and circulation
- Noise
- Air quality (clean air plan consistency, operational criteria air pollutant emissions, and odors)
- Greenhouse gas emissions
- Wind
- Shadow
- Recreation
- Utilities and service systems
- Public services
- Biological resources
- Geology and soils
- Hydrology and water quality
- Hazards and hazardous materials
- Mineral resources
- Energy
- Agriculture and forestry resources
- Wildfire

These items, along with appropriate mitigation measures, 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

E.1 No Impact or Not Applicable Environmental Topics

The proposed project would have no impact on the following environmental topics: aesthetics and parking; agriculture and forestry resources; mineral resources; and wildfire. As a result, this initial study does not discuss these topics further, except that this section briefly describes why the proposed project would have no impact on these topics or why they are not applicable to the proposed project.

Aesthetics and Parking

CEQA section 21099 (d) states: "Aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."[4] Accordingly, aesthetics and parking are not to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- The project is residential, mixed-use residential, or an employment center.
- The project is on an infill site.
- The project is in a transit priority area.

The planning code classifies the existing and proposed use as an institutional use. However, the proposed project is also considered a residential project within the definition of CEQA section 21099(d) in that it would increase the number of residential care units on the site by 23 from 86 to 109 units in total. The proposed project also meets the definition of an employment center. Per CEQA Guidelines section 21099(a)(1), "Employment center project" means a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. For the RM-1 zoning district in which the project site is located, the San Francisco Planning Code table 209.2, Zoning Control Table for RM Districts allows for limited commercial uses and as discussed above, the project would have floor area ratio of 2.08.[5]

The proposed project is also on an infill site because it is on a lot located within an urban area that has been previously developed[6] and the project is in a transit priority area because it is within one-half mile of a major transit stop.[7]

Thus, pursuant to CEQA section 20199, aesthetic and parking impacts of the proposed project would not be significant.

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4 See CEQA Section 21099(d)(1). While under the San Francisco Planning Code the project is defined as institutional use, the project would add senior residences and improvements for residents; thus, the project complies with the definition of a residential infill project per CEQA Section 21099(d)(1).

5 The planning code defines commercial use as "A land use with the sole or chief emphasis on making financial gain, including but not limited to Agricultural Uses, Industrial Uses, Sales and Service Uses, Retail Entertainment Uses, and Auto Uses." Also, a broader definition of "commercial use" from Law Insider is "activities carried out on property developed for industry, commerce, trade, recreation, or business or being developed to be occupied for such purposes, for profit or nonprofit." The proposed expansion of the residential care facility would also meet these definitions of a commercial use. City of San Francisco. Planning Code Section 102. Available at https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_planning/0-0-0-17783. Accessed April 12, 2024.

6 CEQA section 20199(a)(4).

7 San Francisco Planning Department, 2022, San Francisco Transportation Information Map. Available online at: https://sfplanninggis.org/TIM/. Accessed April 12, 2024.

However, as part of the NOP process, comments were received regarding potential aesthetic impacts related to visual character and light and glare. While these concerns are not considered significant impacts on the environment pursuant to CEQA Guidelines section 20199, draft EIR Chapter 2, Project Description includes Figures 2-11 and 2-12 showing existing and proposed project views to the project site and demonstrating that the project would not substantially block any scenic views or vistas from these public vantage points. In addition, the project would comply with City regulations as they pertain to building materials, glass and window finishes that are aimed at minimizing any new potential glare. Comments received on the NOP also expressed concerns that the new buildings would reduce views of the Julia Morgan Building. The Historic Resources Response (HRR), prepared by the City, found that overall, the proposed massing of the new construction would not block public views of the Julia Morgan Building, as the proposed setbacks would not obstruct public views of the existing historic structures, would not compete with the primacy of the Julia Morgan Building, and would not impact the existing setback of the lawn. Section 3.B, Historic Resources, of the draft EIR provides an in depth discussion of the proposed project's potential to impact the eligibility of the Julia Morgan Building for listing in an historic register.

Mineral Resources

The project site is not located in an area with known mineral resources and would not extract mineral resources. Therefore, this topic is not applicable to the proposed project and the project would have no impact, either individually or cumulatively, on mineral resources.

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, this topic is not applicable to the proposed project and the project would have no impact, either individually or cumulatively, on agriculture or 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 and the project would have no impact, either individually or cumulatively, related to wildfire.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.2. LAND USE AND PLANNING. Would the project:					
a) Physically divide an established community?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☒	☐

Impact LU-1: The proposed project would not physically divide an established community. ***(Less than Significant)***

The division of an established community typically involves the construction of a physical barrier to neighborhood access, such as a new freeway, or the removal of a means of access, such as a bridge or roadway. Implementation of the proposed project would not result in the construction of a physical barrier to neighborhood access or the removal of an existing means of access; it would result in the expansion and renovation of an existing residential care facility through the demolition of two existing buildings and construction of two new buildings, as well as renovation of the Julia Morgan Building and the Perry Building within established lot boundaries. Although the proposed project would include modifications to existing loading zones and street parking, the proposed project would not alter the established street grid or permanently close any streets or sidewalks. Although portions of the sidewalks adjacent to the project site could be closed for periods of time during project construction, these closures would be temporary, only occurring during construction, and pedestrian travel would be accommodated via a covered walkway or sidewalks on adjacent streets, if necessary. Therefore, the proposed project would not physically divide an established community and this impact would be less than significant. No mitigation measures are 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. ***(No Impact)***

Land use impacts could be considered significant if the proposed project would conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The determination as to whether a conflict with a land use plan, policy, or regulation is significant under CEQA is based on whether that conflict would result in a significant physical environmental impact. Applicable land use plans that regulate development on the project site include the San Francisco General Plan and San Francisco Planning Code. The proposed project would result in the expansion and renovation of an existing residential care facility through the demolition of two existing buildings and construction of two new buildings, as well as renovation of the Perry Building and the Julia Morgan Building and would conform with the allowable uses under the RM-1 zoning district. The proposed project would not include any new buildings that would be greater than 40 feet in height, which is the maximum height allowed in the 40-X height and bulk district, plus allowed rooftop equipment and appurtenances up to 16 feet in height. Therefore, the proposed project would be consistent with the zoning designation, which implements the general plan, and height and bulk district for the project site, and would not substantially conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

The project's consistency with other applicable plans and policies is further discussed above in Section C, Compatibility with Existing Zoning and Plans. That discussion concludes that the proposed project would not be inconsistent with any applicable regional plans. For these reasons, the project would have no impact with respect to any conflict with land use plans, policies, and regulations adopted for the purpose of mitigating an environmental effect. No mitigation measures are 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. ***(No Impact)***

The cumulative context for land use effects is typically localized, within the immediate vicinity of the project site, or at the neighborhood level. Cumulative development within the project vicinity (within a 0.25-mile radius of the project site) includes the Marina Improvement and Remediation Project. This cumulative project includes potential future improvements to the marina and open space areas along the north waterfront. It is currently unknown if this project would occur at the same time as the proposed project. In addition, improvements would be limited to the waterfront and open space areas and land uses would not change. Accordingly, the proposed project in combination with the cumulative project would not result in a significant cumulative impact related to a conflict with a land use plan, policy, or regulation adopted for the purpose of mitigating an environmental impact.

Upon completion of the proposed project, the project would not physically divide an established community and sidewalk closures during construction would be temporary. Furthermore, even if the proposed Marina Improvement and Remediation Project were to be under construction at the same time as the proposed project, at approximately 830 feet from the project site, the proposed project would not have the potential to combine with the Marina Improvement Project to result in a significant physical environmental impact related to dividing an established community. Therefore, there would be no impact related to cumulative land use and planning impacts and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.3. POPULATION AND HOUSING. Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐	☐
b) Displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐

Impact PH-1: The proposed project would not induce substantial unplanned population growth, either directly or indirectly. ***(Less than Significant)***

In general, a project would be considered growth-inducing if its implementation would result in substantial unplanned population increases, either through the development of new homes and businesses or through the construction of infrastructure, such as the extension of roads, that could lead to substantial new development.

Construction of the proposed project is anticipated to occur over approximately 29 months. The number of temporary construction workers would vary throughout the construction duration depending on the specific construction phase. Construction of the proposed project would not cause substantial population growth or a substantial increase in housing demand for workers in the region. It is anticipated that construction employees who are not already living in San Francisco would likely commute from their residences elsewhere in or outside the Bay Area rather than permanently relocate to San Francisco, as is typical for employees in the construction field. Therefore, construction of the proposed project would not cause a substantial increase in the population of the City or region.

The proposed project would increase the number of residential care suites on the project site from 86 to 109, for an increase of 23 suites. Of the total 109 suites, approximately 10 may have double occupancy; therefore, a total residential population of 119 is anticipated, or an increase of up to 33 residents compared to 86 residents under existing conditions. At project completion, a total of 75 staff members are expected to be employed at the site, which would be an increase of 22 staff members as compared to existing conditions.

The Association of Bay Area Governments (ABAG) prepares projections of employment and housing growth for the Bay Area. The latest projections were prepared as part of Plan Bay Area 2050, adopted by ABAG and the Metropolitan Transportation Commission in 2021. ABAG's growth projections anticipate that by 2050 San Francisco will have 578,000 households (or a population of approximately 1,364,080 persons) and 918,000 employees.[8, 9]

The proposed project is intended to serve the existing demand for residential care services within the community. Current and future elderly individuals who are served by the residential care facility would likely come from within San Francisco and surrounding communities, as would employees, who would continue to commute from current and future housing in San Francisco and surrounding communities. The project would also be located in a developed urban area with available access to necessary infrastructure and services (transportation, utilities, schools, parks, hospitals, etc.). Since the project site is located in an established urban neighborhood and is not an infrastructure project, it would not indirectly induce substantial population growth. This impact is less than significant, and no mitigation measures are required.

Impact PH-2: **The proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing.** ***(Less than Significant)***

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[8] Metropolitan Transportation Commission and Association of Bay Area Government, Plan Bay Area 2050: The Final Blueprint: Growth Pattern: Projected Household and Job Growth, By County: San Francisco. Updated January 21, 2021. Available online at: https://www.planbayarea.org/sites/default/files/FinalBlueprintRelease_December2020_GrowthPattern_Jan2021Update.pdf. Accessed April 12, 2024.

[9] Population is estimated based the total number of households projected as part of the Plan Bay Area 2050 multiplied by the citywide average persons per household from the U.S. Census for San Francisco County, currently 2.36 persons per household. Available online at: https://www.census.gov/quickfacts/sanfranciscocountycalifornia. Accessed April 12, 2024.

A total of six occupied suites are within the two buildings that would be demolished. Residents in these suites would be relocated to vacant suites elsewhere within the facility while demolition takes place. During later stages of construction, existing residents may be moved to new suites created or to other more recently vacated suites as their suites are renovated. At project completion, the residential care facility would provide space for up to 33 additional residents in the 23 new care suites. Therefore, the proposed project would not permanently displace or relocate any of the current residents of the existing residential care facility off-site and would not permanently displace a substantial number of people such that replacement housing would need to be constructed elsewhere. This impact is less than significant, and no mitigation measures are required.

Impact C-PH-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to population and housing. ***(Less than Significant)***

The cumulative context for the population and housing topic is the City and County of San Francisco. As discussed above, ABAG projects that by 2050 San Francisco will have 578,000 households (or a population of approximately 1,364,080 persons) and 918,000 employees.[10] According to census information (based on 2020 data) San Francisco's population is 873,965 with 684,969 employees. As of the third quarter of 2023, approximately 73,934 net new housing units are in the development pipeline, i.e., are either under construction, have building permits approved or filed, or applications filed, including remaining phases of major multi-phased projects.[11] Conservatively assuming that every housing unit in the pipeline is developed and at 100 percent occupancy (no vacancies), the pipeline (which includes the proposed project) would accommodate an additional 73,934 households, or an increased population of approximately 174,484 people.[12] As shown in **Table E.3-1, Citywide Development Pipeline Projections as Compared to ABAG Projections to 2050**, cumulative household (1,048,449 residents) growth based on the development pipeline is below the ABAG projections (1,364,080 residents) for planned growth in San Francisco. Therefore, the proposed project in combination with citywide development would not result in significant cumulative environmental effects associated with inducing unplanned population growth or displacing substantial numbers of people or housing units, necessitating the construction of replacement housing elsewhere and cumulative population and housing impacts would be less than significant. No mitigation measures are required.

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[10] MTC/ABAG. Forecasting and Modeling Report. October 2021. Available online at: https://planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_Forecasting_Modeling_Report_October_2021.pdf. Accessed June 6, 2024.

[11] San Francisco Planning Department, 2023 Q3 Development Pipeline, available at https://sfplanning.org/project/pipeline-report#current dashboard, accessed April 12, 2024.

[12] Population is estimated based the total number of households projected as part of the Plan Bay Area 2050 multiplied by the citywide average persons per household from the U.S. Census for San Francisco County, currently 2.36 persons per household. Available online at: https://www.census.gov/quickfacts/sanfranciscocountycalifornia. Accessed April 12, 2024.

Table E.3-1 Citywide Development Pipeline Projections as Compared to ABAG Projections to 2050

Data Source	Households/Units	Population/Residents (assumes 2.36 persons/ household per Census Data)
2023 Q3 Development Pipeline	73,934 units	174,484
2020 Census	N/A	873,965
Cumulative Total Population/Jobs	N/A	1,048,449
ABAG 2050 Projections	N/A	1,364,080
Pipeline Development within ABAG 2050 Projection?	N/A	Yes. Cumulative development is within planned growth

Note: References to information presented in this table are included in the text above.
N/A = not applicable

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.4. CULTURAL RESOURCES. 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?	☒	☐	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

Historical resources are those properties that meet the definitions in section 21084.1 of the CEQA statute and section 15064.5 of the CEQA Guidelines. Historical resources include properties listed in, or formally determined eligible for listing in, the California Register of Historical Resources (California Register) or in an adopted local register. Historical resources also include resources identified as significant in a historical resource survey that meet certain criteria. Additionally, properties that are not listed but are otherwise determined to be historically significant, based on substantial evidence, would also be considered historical resources. 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." In evaluating whether the proposed project would cause a substantial adverse change in the significance of a historical resource, the lead agency must first determine whether the existing buildings on the project site are historical resources.

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 a potential historic district. Additionally, CEQA requires lead agencies to consider whether projects will impact "unique archeological resources." Public Resources Code section 21083.2, subdivision (g), states that 'unique archeological resource' means an archeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; (2) has a special and particular quality such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person. An archeological site may be considered an historical resource if it is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military or cultural annals of California (Public Resources Code section 5020.1(j)) or if it meets the criteria for listing on the California Register (14 California Code of Regulations section 4850).

Comments received on the NOP related to cultural resources included concerns about the scale of the new buildings and their relationship to the Julia Morgan Building. Commenters stated that the new buildings would reduce the views of the Julia Morgan Building due to their height and their lack of continuity with the architectural style of the Julia Morgan Building and would detract from the historic nature of the building. Additionally, commenters expressed concern that the new buildings would diminish the green space in front of the Julia Morgan Building by their sheer size. Comments received in response to the NOP that concern the proposed project's impact on historic architectural resources are summarized in Section 3.B, Historic Resources, of the draft EIR. Comments received on the NOP related to archeological resources include concerns about the potential for the project to harm archeological and tribal cultural resources; these concerns are addressed below.

Impact CR-1: **The proposed project may cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines §15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code.** ***(Potentially Significant)***

Potential impacts to historic architectural resources are evaluated in the EIR under Impact CR-1 and are not further discussed in this section.

Impact CR-2: **The proposed project could cause a substantial adverse change in the significance of an archeological resource.** ***(Less than Significant with Mitigation)***

In addition to assessing impacts to archeological resources that would meet the requirements for listing as a historical resource, impacts to unique archeological resources are also considered under CEQA, as described in section 15064.5 of the CEQA Guidelines, and CEQA section 21083.2. If an archeological site does not meet the criteria for inclusion in the California Register but does meet the definition of a unique archeological resource as outlined in CEQA section 21083.2, it is entitled to special protection under CEQA. A unique archeological resource implies an archeological artifact, object, or site about which it can be clearly demonstrated that – without merely adding to the current body of knowledge – there is a high probability that it meets one of the following criteria:

- The archeological artifact, object, or site contains information needed to answer important scientific questions, and there is a demonstrable public interest in that information;
- The archeological artifact, object, or site has a special and particular quality, such as being the oldest of its type or the best available example of its type; or
- The archeological artifact, object, or site is directly associated with a scientifically recognized important prehistoric or historic event or person.

A non-unique archeological resource indicates an archeological artifact, object, or site that does not meet the above criteria. Impacts to non-unique archeological resources and resources that do not qualify for listing in the California Register of Historical Resources receive no further consideration under CEQA. It should also be noted that a disturbed or secondarily deposited Native American midden is presumed to be significant for its information potential under CEQA, and it is legally significant unless or until it is demonstrated to the contrary.

A *preliminary archeological review* was completed by the planning department for the proposed project.[13] Although there is previous disturbance to the project site, the project site is underlain by fill and dune sand, which is considered to have high sensitivity for Native American archeological resources. The fill may have isolated historic era materials, but significant historic era archeological resources are not anticipated in the fill or dune sand based on the parcel's late date of development. There are four Native American archeological sites recorded within ¼ mile of the project site, which includes a Native American resource located nearby to the north. The presence of a Native American archeological site to north of the project suggests that there could be similar resources present in the project parcel. Like the proposed project site, the previously identified area was also a sand dune at about 60–80 feet above low mean sea level in 1857 and about 30–40 feet of the dune was graded during the late 19th century. This may indicate that the existing nearby site was redeposited during the grading activities or that it was *in situ* (in the original place) and deeply buried below the sand dune. Therefore, even though the project site was disturbed, the fill and underlaying dune sand is considered to have high sensitivity for Native American archeological resources. With an excavation depth to approximately 15 feet below ground surface for the new basement level, the proposed project would have the potential to adversely affect Native American archeological resources. Therefore, the project soil disturbance could impact potential Native American archeological resources.

As such, if archeological resources or Native American archeological resources were disturbed at the project site, such an impact would be considered significant. To reduce impacts to significant archeological resources, **Mitigation Measure M-CR-2, Archeological Monitoring**, has been identified. Mitigation Measure M-CR-2 would require development of an archeological monitoring plan, archeological training and cultural sensitivity training of construction crews, monitoring during demolition activities and monitoring during

[13] San Francisco Planning Department. Environmental Planning Preliminary Archaeological Review. July 20, 2023.

excavation of the new basement by both an archeologist and Native American monitor. In addition, the mitigation measure outlines procedures if resources of importance are found, beginning with preservation in place, and the preparation of an archeological resources recovery plan and public interpretation plan, if said preservation is not possible. Mitigation Measure M-CR-2 is proven to either avoid or lessen impacts to archeological resources through monitoring, stop work procedures and investigation and interpretation of significant resources.

Mitigation Measure M-CR-2: Archeological Monitoring

Archeological Monitoring Program. The purpose of the archeological monitoring program will be to observe soil disturbing construction activities in order to determine if significant archeological resources are present at the project site and to ensure significant archeological resources are appropriately protected or treated. The project sponsor shall retain the services of an archeological consultant from the rotational Qualified Archeological Consultants List (QACL) maintained by the planning department. After the first project approval action or as directed by the Environmental Review Officer (ERO), the project sponsor shall contact the department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL.

The archeological consultant shall undertake an archeological monitoring program as specified herein. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. In addition, the consultant shall be available to conduct a data recovery program if required pursuant to this measure. Archeological data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines section 15064.5 (a)(c).

Archeological Monitoring Plan. The archeological monitoring program shall be conducted in accordance with the approved Archeological Monitoring Plan (AMP). The archeological consultant, Native American representatives, and the ERO shall consult on the scope of the AMP, which shall be approved by the ERO prior to any project-related soils disturbing activities commencing. The ERO in consultation with the project archeologist and Native American representatives shall determine what project soils disturbing activities shall be archeologically monitored. The AMP shall be submitted first and directly to the ERO for review and comment and shall be considered a draft subject to revision until final approval by the ERO. The

archeologist shall implement the monitoring as specified in the approved AMP during construction. The archeological and Native American monitors shall be present on the project site according to a schedule agreed upon by the archeological consultant, Native American representative, and the ERO until the ERO has determined that project construction activities could have no effects on significant archeological deposits.

The AMP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, lay out what scientific/ historical research questions are applicable to the expected resource, Native American cultural significance of the expected resources, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions.

Archeological and Cultural Sensitivity Training. The archeological consultant and local Native American representative shall provide a training to the prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils-disturbing activities within the project site. The training shall advise all project contractors to be on the alert for evidence of the presence of the expected archeological resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource by the construction crew. The Native American representative at their discretion shall provide a Native American cultural sensitivity training.

Collection During Archeological Monitoring. The monitor is authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. Ecofacts are biological or geological objects or deposits related to human activity, but not manufactured by humans. Examples of ecofactual materials include animal bones, charcoal, plants, and pollen that can tell us about past diet or environments.

Paleoenvironmental Analysis of Paleosols. When a submerged paleosol is identified during monitoring, irrespective of whether cultural material is present, samples shall be extracted and processed for dating, flotation for paleobotanical analysis, and other applicable special analyses pertinent to identification of possible cultural soils and for environmental reconstruction. The results of analysis of collected samples shall be reported on in results reports.

Discovery Treatment Determination. If an intact archeological deposit is encountered, all soils disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction crews and heavy equipment until the deposit is evaluated. The archeological consultant shall

immediately notify the ERO of the encountered archeological deposit. The archeological consultant in coordination with the Native American monitor shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, present the findings of this assessment to the ERO.

If the ERO in consultation with the archeological consultant and Native American monitor determines that a significant archeological resource or tribal cultural resource is present and that the resource could be adversely affected by the proposed project, the ERO, in consultation with the project sponsor, shall determine whether preservation of the resource in place is feasible. If so, the proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource and the archeological consultant shall prepare an archeological resource preservation plan, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft preservation plan to the planning department for review and approval. If preservation in place is not feasible, a data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Consultation with Descendant Communities. On discovery of an archeological site associated with descendant Native Americans, the Overseas Chinese, or other potentially interested descendant group an appropriate representative of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to offer recommendations to the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. The representative of the descendant group at their request may provide a cultural sensitivity training to soil-disturbing construction contractors. The ERO and project sponsor shall work with the tribal representative or other representatives of descendant communities to identify the scope of work to fulfill the requirements of this mitigation measure, which may include participation in preparation and review of deliverables (e.g., plans, interpretive materials, artwork). Representatives shall be compensated for their work as identified in the agreed upon scope of work. A copy of the Archeological Resources Report (ARR) (described further below) shall be provided to the representative of the descendant group.

Archeological Data Recovery Plan. An archeological data recovery program shall be conducted in accordance with an Archeological Data Recovery Plan (ADRP) if all three of the following apply: (1) a resource has potential to be significant, (2) preservation in place is not feasible, and (3) the ERO determines that an archeological data recovery program is warranted. The

project archeological consultant, local Native American representative, project sponsor, and ERO shall meet and consult on the scope of the ADRP. The archeological consultant in coordination with the Native American representative shall prepare a draft ADRP that shall be submitted to the ERO for review and approval. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain and will coordinate with Native American representative(s) to ensure that cultural values are addressed. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical or if the Native American representative does not approve of destructive methods.

The scope of the ADRP shall include the following elements:

- **Field Methods and Procedures.** Descriptions of proposed field strategies, procedures, and operations.

- **Cataloguing and Laboratory Analysis.** Description of selected cataloguing system and artifact analysis procedures.

- **Discard and Deaccession Policy.** Description of and rationale for field and post-field discard and deaccession policies.

- **Security Measures.** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.

- **Final Report.** Description of proposed report format and distribution of results.

- **Curation.** Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Cultural Resources Public Interpretation Plan. The project archeological consultant shall submit a Cultural Resources Public Interpretation Plan (CRPIP) if a significant archeological resource is discovered during a project. As directed by the ERO, a qualified design professional with demonstrated experience in displaying information and graphics to the public in a visually interesting manner, local artists, or community group may also be required

to assist the project archeological consultant in preparation of the CRPIP. If the resource to be interpreted is a tribal cultural resource, the CRPIP shall be prepared in consultation with and developed with the participation of local Native American tribal representatives. The CRPIP shall describe the interpretive product(s), locations or distribution of interpretive materials or displays, the proposed content and materials, the producers or artists of the displays or installation, and a long-term maintenance program. The CRPIP shall be sent to the ERO for review and approval. The CRPIP shall be implemented prior to occupancy of the project.

Human Remains and Funerary Objects. The treatment of human remains and funerary objects discovered during any soil-disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Office of the Chief Medical Examiner of the City and County of San Francisco (Medical Examiner). The ERO also shall be notified immediately upon the discovery of human remains. In the event of the Medical Examiner's determination that the human remains are Native American remains, the Medical Examiner shall notify the California State Native American Heritage Commission (NAHC), which will appoint a Most Likely Descendant (MLD). The MLD will complete his or her inspection of the remains and make recommendations or preferences for treatment within 48 hours of being granted access to the site (Public Resources Code section 5097.98(a)).

The landowner may consult with the project archeologist and project sponsor and shall consult with the MLD and ERO on preservation in place or recovery of the remains and any scientific treatment alternatives. The landowner shall then make all reasonable efforts to develop an Agreement with the MLD, as expeditiously as possible, for the treatment and disposition, with appropriate dignity, of human remains and funerary objects (as detailed in CEQA Guidelines section 15064.5(d)). Per Public Resources Code 5097.98 (b)(1), the Agreement shall address and take into consideration, as applicable and to the degree consistent with the wishes of the MLD, the appropriate excavation, removal, recordation, scientific analysis, custodianship prior to reinterment or curation, and final disposition of the human remains and funerary objects. If the MLD agrees to scientific analyses of the remains and/or funerary objects, the archeological consultant shall retain possession of the remains and funerary objects until completion of any such analyses unless otherwise specified in the Agreement, after which the remains and funerary objects shall be reinterred or curated as specified in the Agreement.

Both parties are expected to make a concerted and good faith effort to arrive at an Agreement, consistent with the provisions of Public Resources Code 5097.98. However, if the landowner and the MLD are unable to reach an Agreement, the landowner, ERO, and project sponsor shall ensure that the

remains and/or mortuary materials are stored securely and respectfully until they can be reinterred on the property, with appropriate dignity, in a location not subject to further or future subsurface disturbance, consistent with state law.

Treatment of historic-period human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity, additionally, shall follow protocols laid out in the project's archeological treatment documents, and in any related agreement established between the Medical Examiner and the ERO. The project archeologist shall retain custody of the remains and associated materials while any scientific study scoped in the treatment document is conducted and the remains shall then be curated or respectfully reinterred by arrangement on a case-by-case basis.

Archeological Resources Report. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO. The archeological consultant shall submit a draft Archeological Resources Report (ARR) to the ERO that evaluates the historical significance of any discovered archeological resource, describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken, and if applicable, discusses curation arrangements. Formal site recordation forms (CA DPR 523 series) shall be attached to the ARR as an appendix.

Once approved by the ERO, copies of the ARR shall be distributed as follows: California Historical Resources Information System, Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the approved ARR to the NWIC. The environmental planning division of the planning department shall receive one (1) bound hardcopy of the ARR. Digital files that shall be submitted to the environmental planning division include an unlocked, searchable PDF version of the ARR, GIS shapefiles of the site and feature locations, any formal site recordation forms (CA DPR 523 series), and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. The PDF ARR, GIS files, recordation forms, and/or nomination documentation should be submitted via USB or other stable storage device. If a descendant group was consulted during archeological treatment, a PDF of the ARR shall be provided to the representative of the descendant group.

Curation. Significant archeological collections and paleoenvironmental samples of future research value shall be permanently curated at an established curatorial facility or Native American cultural material shall be returned to local Native American tribal representatives at their discretion.

The facility shall be selected in consultation with the ERO. Upon submittal of the collection for curation the sponsor or archeologist shall provide a copy of the signed curatorial agreement to the ERO.

With implementation of Mitigation Measure M-CR-2, in the event that archeological resources are discovered, preservation in place of the resource or implementation of a data recovery and/or public interpretation plan is required. Therefore, the significant information that the archeological resource(s) provides would either be preserved or documented. With implementation of these measures, the proposed project's impact on prehistoric or historic archeological resources would be less than significant.

Impact CR-3: The proposed project could disturb human remains, including those interred outside of formal cemeteries. ***(Less than Significant with Mitigation)***

Archeological resources may include human burials. Human burials outside of formal cemeteries often occur in prehistoric or historic period archeological contexts. There are no human burials, including those interred outside of formal cemeteries, located in the immediate vicinity of the project site. However, human remains may be present in prehistoric archeological deposits, and also may potentially be found in isolation. In the event that human remains are encountered during construction, any inadvertent damage to human remains would be considered a significant impact. To reduce this impact to a less than significant level, Mitigation Measure M-CR-2 details procedures for the appropriate treatment of human remains if encountered during construction.

Furthermore, the treatment of human remains and of associated or unassociated funerary objects must comply with applicable state laws. This includes immediate notification to the county coroner (San Francisco Office of the Chief Medical Examiner) and, in the event of the coroner's determination that the human remains are Native American, notification of the California Native American Heritage Commission, which shall appoint a most likely descendent.[14] With implementation of Mitigation Measure M-CR-2 and for the above reasons, the proposed project would have a less-than-significant impact related to the potential disturbance of human remains.

Impact C-CR-1: The proposed project, in combination with cumulative projects, may cause a substantial adverse change in the significance of a historical resource. ***(Potentially Significant)***

Potential cumulative impacts to historic architectural resources are evaluated in the draft EIR under Impact C-CR-1 and are not further discussed in this section.

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[14] California Public Resources Code section 5097.98.

Impact C-CR-2: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to archeological resources or human remains. ***(Less than Significant)***

The cumulative context for archeological resources and human remains is generally site specific and limited to the immediate construction area or area immediately adjacent to the construction area. The only cumulative project within the vicinity of the project site is the Marina Improvement and Remediation Project, which is approximately 830 feet from the project site and is unlikely to impact the same known or yet to be identified archeological resources as the construction activities occur within the project sites. As such, the proposed project, in combination with other reasonably foreseeable projects, would not result in a cumulative impact on archeological resources or human remains. No mitigation measures are required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.5. TRIBAL CULTURAL RESOURCES. 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	☐	☒	☐	☐	☐
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.	☐	☒	☐	☐	☐

Comments received in response to the NOP expressed concerns regarding potential impacts to tribal cultural resources from project construction.

Impact TC-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources or that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. (*Less than Significant with Mitigation*)

CEQA section 21074.2 requires the CEQA lead agency to consider the effects of a project on tribal cultural resources. As defined in section 21074, tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are listed, or determined to be eligible for listing, on the national, state, or local register of historic resources.

Pursuant to CEQA section 21080.3.1(d), on July 20, 2023, the planning department contacted Native American individuals and organizations for the San Francisco area, providing a description of the project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity. During the comment period, one Native American tribal representative responded to the tribal cultural resources notification requesting the following, as there is a nearby Native American archeological site:

- All crews, individuals and personnel who will be moving any earth be trained in cultural sensitivity.
- A qualified California trained archaeological monitor be present during any earth movement.
- A qualified Native American monitor be present during any earth movement.

The department reached out to the Native American tribal representative to request if they would like to schedule a consultation meeting or had additional concerns or recommendations. No additional consultation was requested and no further concerns or recommendations were received. All of the above requests have been included in Mitigation Measure M-CR-2, Archeological Monitoring in Section E.4, Cultural Resources.

As discussed in Impact CR-2 in Section E.4, Cultural Resources, the project has the potential to adversely affect Native American archeological resources and a known Native American resource is in very close proximity to the project site.

In San Francisco, based on tribal consultation undertaken by the City and County of San Francisco in 2015 and ongoing consultation including the Native American recommendations for the project site, Native American archeological resources are considered to be tribal cultural resources. Impact CR-2 determined that the proposed project's excavation could result in a significant impact to Native American archeological resources should any be encountered. Therefore, the proposed project also has the potential to encounter tribal cultural resources during soil disturbing activities. Any inadvertent damage to tribal cultural resources would be considered a significant impact.

Beyond the identification of Native American archeological resources as tribal cultural resources, Native American tribal consultation undertaken for the Housing Element 2022 Update Environmental Impact Report identified both San Francisco's modern shorelines and the location of historical waterways as potential tribal cultural resources. The project site is not located on the modern San Francisco Bay and ocean shoreline or on the shores of remnant creek channels, lakes, or ponds that are characterized by

above-ground water today. The project site is not located directly adjacent to known historical locations of creek channels, ponds, marshes, and other wetlands. The project area is not in an area that was submerged by water due to natural environmental change between about 8,000 years ago and 170 years ago. Based on this information, the project site does not appear to be a tribal cultural resource per the above criteria.

Nevertheless, as discussed above, the project site is sensitive for Native American archeological resources and is located near known Native American archeological resources, which are considered tribal cultural resources by local Native American representatives due to the cultural value of specific areas of traditional habitation by their ancestors. While proposed project activities may result in a significant impact to tribal cultural resources, the combination of M-CR-2, Archeological Monitoring in Section E.4, Cultural Resources and **Mitigation Measure M-TC-1, Tribal Cultural Resources Program**, below, has been identified to reduce impacts to tribal cultural resources encountered during construction activities to less-than-significant levels.

Mitigation Measure M-TC-1: Tribal Cultural Resources Program

Preservation in Place. In the event of the discovery of a tribal cultural resource, the Environmental Review Officer (ERO), the project sponsor, and the tribal representative shall consult to determine whether preservation in place would be feasible and effective. Coordination shall take place with local Native American representatives, including the Association of Ramaytush Ohlone and other interested Ohlone parties. If it is determined that preservation-in-place of the tribal cultural resource would be both feasible and effective, then the project sponsor in consultation with local Native American representatives and the ERO shall prepare a tribal cultural resource preservation plan (TCRPP). If the tribal cultural resource is an archeological resource of Native American origin, the archeological consultant shall prepare an archeological resource preservation plan (ARPP) in consultation with the local Native American representative, which shall be implemented by the project sponsor during construction. The consultant shall submit a draft ARPP to the planning department for review and approval.

Public Interpretation Land Acknowledgement. The project sponsor shall, in consultation with local Native American representatives, design and install public interpretation at the project site acknowledging that this project is built on traditional Ohlone land. The interpretive program may include a combination of artwork, preferably by local Native American artists, educational panels or other informational displays or interpretative elements. Within a reasonable timeframe, the project sponsor shall prepare an interpretation plan in consultation with affiliated local Native American representatives and the ERO to guide the acknowledgment program. The plan shall identify, as appropriate, the proposed location for the acknowledgement, the proposed content and materials, the producers or artists, and a long-term maintenance program. If Native American cultural resources are found during Project construction, interpretation of these resources may be included in the interpretative program in consultation with

the local Native American representatives and the ERO. The detailed content, media, and other characteristics of such an interpretive program shall be coordinated and approved by the local Native American representatives and the ERO. The final components of the public interpretation program shall be constructed and an agreed upon schedule for their installation and a plan for their maintenance shall be finalized prior to issuance of a Temporary Certificate of Occupancy. Tribal representatives shall be compensated for their work as identified in the agreed upon scope of work. Mitigation Measure M-TC-1 would require preservation in place of the tribal cultural resources if determined effective and feasible and coordination with the affiliated Native American tribal representatives to prepare and implement a public land acknowledgement program regarding tribal cultural resources. Therefore, with implementation of Mitigation Measure M-TC-1, the proposed project's impact on tribal cultural resources would be less than significant.

Impact C-TC-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on tribal cultural resources. ***(Less than Significant)***

The cumulative context for tribal cultural resources is generally site specific. However, as tribal cultural resources take into consideration the cultural value and significance of a location of past or current activities and life ways, the tribal cultural resources may expand beyond the boundaries of identified physical materials, such as individual archeological site boundaries. However, the only cumulative project within the vicinity of the project site is the Marina Improvement and Remediation Project, which is located approximately 830 feet from the project site. Similar to the discussion above in Impact C-CR-2, in Section E.4, Cultural Resources, impacts of the proposed project would be unlikely to combine with impacts of cumulative development to result in cumulative impacts to tribal cultural resources. Therefore, cumulative impacts to tribal cultural resources would be less than significant.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.6. TRANSPORTATION AND CIRCULATION. 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?	☐	☐	☒	☐	☐
b) Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations?	☐	☐	☒	☐	☐
c) Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access?	☐	☐	☒	☐	☐
d) Substantially delay public transit?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☐	☒

This evaluation of potential transportation and circulation impacts was prepared in accordance with the department's San Francisco Transportation Impact Analysis Guidelines for Environmental Review (SF

Guidelines).[15] Additional technical information related to project trip generation, freight loading, and passenger loading is provided in Appendix E of the draft EIR.

As discussed under "Aesthetics and Parking" discussion in Section E.1 above, the project would satisfy the eligibility criteria for a transit-oriented infill project under CEQA section 21099(d)(1), and thus the amount of parking shall not be considered in determining if a project has the potential for environmental effects. The SF Guidelines include a screening criterion for development projects to determine if a proposed project would result in a substantial parking deficit that could result in secondary environmental effects.[16] Development projects located within the department's map-based screening area for the VMT analysis would not create a substantial vehicle parking deficit, and therefore would not result in secondary effects. The map-based screening area refers to those areas of the City where existing VMT per capita is at least 15 percent below the regional average VMT per capita.[17] The project site is located within the map-based screening area and therefore, Topic E.6(g) is not applicable to the proposed project and is not discussed further in this initial study.

San Francisco Administrative Code Chapter 31 directs the planning department to identify environmental effects of a project using as its base the environmental checklist form set forth in Appendix G of the CEQA Guidelines. As it relates to transportation and circulation, Appendix G asks whether the project would:

- Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);[18]
- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses; and
- Result in inadequate emergency access.

The planning department uses City-developed significance criteria to facilitate the transportation analysis and address the Appendix G checklist. The planning department separates the significance criteria into construction and operation.

Travel Demand

Localized trip generation of the total proposed project and the net new additions to the project site were calculated using a trip-based analysis and information included in the SF Guidelines developed by the planning department. The methodology for estimating trip generation and travel mode split (walk, drive, transit, etc.) using the SF Guidelines, relies on observational and intercept survey data collected from recently completed projects in San Francisco. The data collected to support updated trip generation rates and mode share were collected in 2016 and 2017, when transportation network companies (TNCs) were

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15 San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review (February 2019, updated October 2019), https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines, accessed on May 7, 2024.

16 San Francisco Planning Department, Transportation Impact Analysis Guidelines, October 2019, Appendix O, Vehicular Parking, p.0-4. Available at https://default.sfplanning.org/publications_reports/TIA_Guidelines.pdf, accessed on May 7, 2024.

17 These areas are mapped in the San Francisco Transportation Information Map available at: https://sfplanninggis.org/TIM/. Accessed May 1, 2024.

18 CEQA Guidelines Section 15064.3, subdivision (B) states that transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact.

widely in use, and therefore take into account estimates of the number of for-hire vehicles (taxis/TNCs) from new development.

The proposed project would include expansion and renovation of the existing Heritage on the Marina, a residential care facility. In total, the proposed project would add approximately 58,380 square feet of institutional use and increase the number of residential care suites by 23 from 86 to 109. The project would increase on-site employees by 22, resulting in a total of 75 employees. The total gross square footage of the proposed project would be 141,580. The proposed project would not result in a change in use or substantial increase in the number of residential care suites or employees compared to existing conditions.

Trip generation refers to the number of estimated trips people would take to and from the project site (person trips). These trips are broken down by mode, i.e., the estimated way or method people travel (e.g., walking, bicycling, transit). Auto trips are further broken down into vehicle trips, which account for average vehicle occupancy in the census tract in which the project site is located. The planning department's approach to analyzing the proposed project's trip generation is conservative, i.e., high, as the inputs for analysis were "residential units" and "office" as a proxy for the institutional use of the Heritage on the Marina residential care facility.

With the proposed project, the project site would generate an estimated 1,613 total daily person trips. Of the daily person trips, an estimated 611 person trips would be by auto, 142 person trips by Taxi or TNCs, 302 transit person trips, 360 walk person trips, and 51 bike person trips. Based on the expected mode share and average vehicle occupancy, the proposed project would generate 494 daily vehicle trips and 95 daily Taxi/TNC trips.[19] The p.m. peak hour person trips are summarized in **Table E.6-1, Total Travel Demand Estimate, PM Peak Vehicle Trips with Proposed Project**.

Table E.6-1 Total Travel Demand Estimate, PM Peak Vehicle Trips with Proposed Project

	Person Trips		Vehicle Trips	
Mode	Total	PM peak	Total	PM Peak
Auto	611	54	494	44
TNC/Taxi	142	13	95	8
Transit	302	27	--	--
Private Shuttle	146	13	--	--
Bike	51	5	--	--
Walk	360	329	--	--

[19] Daily person and vehicle trip totals may not add due to rounding; consistent with Planning Department 2019 Transportation Impact Analysis Guidelines.

Table E.6-1 Total Travel Demand Estimate, PM Peak Vehicle Trips with Proposed Project

Mode	Person Trips		Vehicle Trips	
	Total	PM peak	Total	PM Peak
Site Total with Proposed Project	**1613**	**144**	**588**	**52**
Total Net New Trips	**787**	**70**	**302**	**27**

NOTE: Travel Demand inputs: Total proposed project: 99 studio units, 10 one-bedroom units and 71,580 square feet of office (proxy for institutional) at 3400 Laguna Street, Placetype 2. Net new project: 23 studio units and 43,620 square feet of office (proxy for Institutional) at 3400 Laguna Street, Placetype 2.

As shown in Table E.6-1 above, with the proposed project, the project site would generate a total of 144 person trips (inbound and outbound) during the p.m. peak hour, with 70 of those person trips contributed by the proposed project's addition of 23 residential care suites and 43,620 square feet of institutional uses.[20] During the p.m. peak hour, the project site with the proposed project would generate an estimated 52 vehicle trips, with 27 of those trips contributed by the proposed project's additions. The City determined that the increases in the p.m. peak-hour volume of vehicle trips to and from the project site would be low and a transportation impact study would not be required.[21]

The proposed project's freight and commercial loading demand is presented in **Table E.6-2, Freight Loading Demand by Land Use**, Freight Loading Demand by Land Use. The proposed project would generate a loading demand of up to one loading space during the peak hour of freight loading activity.

Table E.6-2 Freight Loading Demand by Land Use

Land Use	Proposed Project Freight Loading Demand (Spaces)	
	Average Hour	Peak Hour
Institutional (Office used as proxy)	0.70	0.87
Residential	0.10	0.12
Rounded Total	**1**	**1**

SOURCES: San Francisco Planning Department, 2019 TIA Guidelines, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update, accessed May 14, 2024.

[20] The proposed project would increase the institutional uses at the site by 58,830 gross square feet, which is inclusive of the 23 net new residential care suites that would be added. To more accurately calculate institutional use trip generation verses resident trip generation, the planning department separated living quarter uses from institutional uses by subtracting the average residential care suite size (70,000 square feet / 109 residential care suites = 642 square feet) times 23 new suites (642 * 23 = 14,766 residential square feet) from 58,830. The result was 43,620 (when rounded to the nearest ten).

[21] San Francisco Planning Department. Transportation Coordination Memo, 3400 Laguna Street, Heritage on the Marina, 2022-009819ENV. June 7, 2024.

The proposed project passenger loading space demand by land use is presented in **Table E.6-3, Passenger Loading Demand by Land Use**. The proposed project would generate a passenger loading demand of one passenger loading space during any given minute of the peak hour throughout the average peak period of loading activity.

Table E.6-3 Passenger Loading Demand by Land Use

	Proposed Project	
	Passenger Loading Demand (Spaces)	
Land Use	Peak Hour	Peak 15-minute
Institutional (Office used as proxy)	0.22	0.45
Residential (Studio units used as proxy)	0.05	0.10
Rounded Total	**1**	**1**

Sources: San Francisco Planning Department, 2019 TIA Guidelines, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update, accessed May 14, 2024.

Comments received in response to the NOP regarding the proposed project's potential impact on the transportation and circulation system included concerns about additional congestion and potential impacts to nearby Muni lines. Additional comments detailed concerns regarding pedestrian safety, and commercial drop off and loading regulations on Bay Street.

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)***

The proposed project would be subject to the San Francisco Regulations for Working in San Francisco Streets (the blue book).[22] The blue book is prepared and regularly updated by the San Francisco Municipal Transportation Agency, under the authority derived from the San Francisco Transportation Code. It serves as a guide for contractors working in San Francisco streets. The blue book establishes rules and guidance so that construction work can be done safely and with the least possible interference with pedestrian, bicycle, transit, and vehicular traffic.

During the anticipated 29-month construction period, the proposed project would require temporary partial closures of the public right-of-way to allow demolition of existing structures and construction of new structures on Bay and Francisco streets and proposed driveway and streetscape improvements. However, as construction staging would occur on the project site, these closures would be limited in duration and

[22] San Francisco Municipal Transportation Agency (SFMTA), Regulations for Working in San Francisco Streets, Revised February 21, 2023, http://www.sfmta.com/bluebook, accessed May 17, 2024.

coordinated with the San Francisco Municipal Transportation Agency in compliance with blue book regulations.

For sidewalks and bicycle lanes along the closed frontages, signage and protection for people walking and bicycling would be installed, as appropriate. The contractor would be required to maintain adequate bicycle and walking circulation at all times, and any closures would be coordinated with the City in order to minimize the impacts on local traffic. Compliance with blue book regulations would ensure that any potential construction impacts related to road closures would be reduced to less than significant. Therefore, the proposed project would have a less-than-significant transportation-related construction impact, and no mitigation measures are 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)***

The proposed project does not include any features that could increase hazardous conditions for people walking, biking, or driving in the project vicinity. The proposed project would not change the adjacent travel lanes or transit operations for transit routes within the vicinity of the project site, or any of the existing bus stops in the area.

The proposed project would add two new bulb-outs per planning code section 138.1, Streetscape and Pedestrian Improvements. The first bulb-out would wrap around the intersection of Laguna and Bay streets and would project 6 feet into the Laguna and Bay streets rights-of-way. The bulb-out would terminate at the existing curb cut on Bay Street. The second bulb-out would wrap around the intersection of Laguna Street and Francisco Street and would project 6 feet into the Laguna and Francisco streets rights-of-way. The added bulb-outs would reduce the length of crosswalks at these intersections, improve visibility, and encourage drivers to slow down, while improving pedestrian and bicycle safety.

A new basement level garage would be constructed beneath the proposed Bay and Francisco buildings and the existing interior courtyard. A new two-directional, 20-foot-wide driveway on Bay Street would provide access to the new basement, east of the existing entrance. One of these two lanes may be partially impinged if a 40-foot truck would be parked in the loading dock, but this would not restrict auto ingress or egress. All vehicles (trucks and autos) would be restricted to right-only turns into and out of the driveway. The new driveway would necessitate the removal of 17 existing off-street surface parking spaces and approximately 15 feet of on-street parking along Bay Street, for a total loss of one on-street parking space on Bay Street. At this location, a 20-foot-long, two-vehicle-wide, off-street covered porte cochère (accessed from the existing curb cut on Bay Street) would provide universal access required by the residential care facility, in compliance with the ADA. The existing driveway on Bay Street, west of the new driveway, would also provide access to five project site surface parking spaces. These modifications would allow passenger pick up and drop off activities to occur on site and provide easier vehicular ingress and egress to and from the site.

The project site has approximately 45 feet of passenger loading (white curb) and 20 feet of accessible parking (blue curb) on the Laguna Street frontage, and 22 feet of loading (white curb) on the Francisco Street frontage. As part of the proposed project, the on-street white curb loading space on Francisco Street would be removed along with the associated approximately 18-foot-wide curb cut. Freight loading access and activity currently occurs via Bay Street in the off-street surface parking lot's loading area. Figures 2-13 and 2-

14 in Chapter 2, Project Description, of the draft EIR, show the existing and proposed freight loading entry and exits. Freight trucks back into the loading parking spot available in the existing parking lot. For delivery trucks to maneuver in and out of the project site's loading areas, Bay Street currently experiences traffic interruptions approximately nine times weekly for food delivery and approximately twice weekly for trash pick-up, each instance for the duration of vehicles backing into the existing loading space. Currently the largest freight vehicles that access the existing loading dock are 26 feet. Under the existing conditions, smaller (up to 30-foot) delivery trucks backing into the parking lot for loading temporarily block the sidewalk via the curb cut as they maneuver back in, but not once parked at the loading dock. If any larger (40-foot) delivery trucks were to access the existing loading dock, those vehicles would block the sidewalk via the curb cut while parked at the loading dock, in addition to while they maneuver back in.

Loading access to the site would be modified such that smaller (up to 30-foot) delivery vehicles would enter the site by approaching eastbound on Bay Street and backing into the service area via the new 20-foot-wide driveway, temporarily blocking the sidewalk (via the curb cut) and driveway as they maneuver back in, but not once parked at the loading dock. Larger (40-foot) delivery trucks would enter the site by approaching westbound on Bay Street and backing directly into the loading dock from the street. Though these trucks would temporarily block the sidewalk via the curb cut as they maneuver back in, they would not block the sidewalk once parked at the loading dock, as it is current practice. All trucks would then depart by making a right turn eastbound onto Bay Street. With the new vehicle entrance on Bay Street, loading truck egress from the project site would occur farther east from the Bay and Laguna streets intersection than under existing conditions, and would thus minimize traffic conflicts and improve safety. The new curb cut for the loading dock would also be used for the proposed basement-level parking garage. Overall, loading activity ingress and egress would be less hazardous than current conditions with the proposed project and delivery vehicles would no longer block the public right-of-way when parked.

The proposed project's features would not create traffic hazards (e.g., sharp curves or dangerous intersections) or increase the number or severity of conflicts between vehicles and the other ways people travel. With the new driveway and loading dock on Bay Street, loading truck egress from the project site would occur farther east from the Bay and Laguna streets intersection than under existing conditions, and would thus minimize traffic conflicts and improve safety. For these reasons, the project would not increase hazardous conditions at the site and so would result in a less-than-significant impact related to potentially hazardous conditions and accessibility. No mitigation measures are required.

Impact TR-3: The proposed project would not interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access. ***(Less than Significant)***

The proposed project would not result in a substantial increase in vehicle trips to or from the site. The increase in building square footage would correlate to an increase of 302 average daily vehicle trips on the surrounding roadways.[23] As discussed above, project implementation would not alter the established street grid, permanently close any streets or sidewalks, or eliminate or reconfigure any existing bicycle routes. Emergency vehicle access would remain unchanged from existing conditions. Emergency vehicles would

[23] San Francisco Planning Department. Transportation Coordination Memo, 3400 Laguna Street, Heritage on the Marina, 2022-009819ENV. June 7, 2024.

continue to access the project site from Bay Street, with improved ingress and egress with the proposed 20-foot-long porte cochère. Implementation of the proposed project would not preclude or restrict emergency vehicle access to the project site. Thus, this impact would be less than significant, and no mitigation measures would be required.

Impact TR-4: The proposed project would not substantially delay public transit. ***(Less than Significant)***

As previously described, the proposed project would not result in a substantial increase in vehicle trips to or from the site. The 23 new residential care suites and addition of 22 employees to the site would generate an increase of 302 average daily vehicle trips on the surrounding roadways and 27 peak-hour vehicle trips.[24] The planning department has determined that projects with less than 300 vehicle trips during the peak hour would not result in transit delay greater than the threshold of significance of four minutes. Therefore, the proposed project would not generate a substantial number of vehicle trips that could delay public transit, and this impact would be less than significant. No mitigation measures are required.

Impact TR-5: The proposed project would not cause substantial additional vehicle miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas or by adding new roadways to the network. ***(Less than Significant)***

The Transportation Impact Analysis Guidelines set forth screening criteria for types of projects that would typically not result in significant vehicle miles traveled impacts. The project site is located within an area where existing vehicle miles traveled per capita is more than 15 percent below the existing regional per capita average. The proposed project meets this locational screening criterion, and therefore would have a less-than-significant impact related to vehicle miles traveled and no mitigation measures are required.[25]

Impact TR-6: The proposed project would not result in a loading deficit. ***(Less than Significant)***

Freight Loading

The proposed project would provide one 45-foot-long off-street freight loading space adjacent to the new two-directional driveway. Additionally, as discussed above under Impact TR-2, an approximately 20-foot-long, double lane, off-street covered porte cochère would be used for smaller freight trucks maneuvering into the off-street loading space, as well as parcel delivery vehicles.

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[24] San Francisco Planning Department. Transportation Coordination Memo, 3400 Laguna Street, Heritage on the Marina, 2022-009819ENV. June 7, 2024.

[25] San Francisco Planning Department, 2022, San Francisco Transportation Information Map. Website: https://sfplanninggis.org/TIM/. Accessed April 12, 2024.

The proposed project would generate an estimated freight loading demand of up to one space during the peak hour of freight loading activity. As such, the proposed supply of off-street freight loading space would meet the expected peak hour demand.

Passenger Loading

The proposed project would provide at least one off-street passenger loading space in the form of an approximately 20-foot-long, double lane, off-street covered porte cochère, which would provide ADA access to the site. Thus, the proposed project's passenger loading supply would meet the demand for one space during the p.m. peak hour (Table E.6-3).

Additionally, Laguna Street adjacent to the project site currently has approximately 45 feet of on-street passenger loading (white curb), which would remain unchanged by the proposed project and can accommodate two standard passenger vehicles.

Therefore, passenger loading associated with the proposed project would not create queues and therefore not impede transit operations or create conflicts people walking or bicycling and project impacts 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 a significant cumulative impact on transportation and circulation. ***(Less than Significant)***

Construction

Generally, only projects that are constructed simultaneously and are within the same project block or could affect truck routing could combine to result in cumulative construction impacts. Construction traffic from both the proposed project and the Marina Improvement and Remediation Project would be expected to use Laguna and Bay streets. As discussed under Impact TR-1, the proposed project would be subject to the blue book requirements during construction. The blue book establishes rules and guidance so that work can be done safely and with the least possible interference with people walking and bicycling, transit, and vehicular traffic. The Marina Improvement and Remediation Project would also be subject to the same regulations, which would ensure that even if both projects were under construction at the same time, they would not result in any significant cumulative construction transportation impacts. Therefore, the project and reasonably foreseeable projects would not result in a significant cumulative construction-related transportation impact, and no mitigation measures are required.

Operation

The Marina Improvement and Remediation Project is not expected to generate a substantial amount of new vehicle trips as this project consists of open space and harbor improvements with no residential or commercial component. Loading, accessibility, and emergency access are all localized effects and because the project site is 830 feet from the Marina Improvement Project, it would not combine with the proposed project to result in a significant cumulative impact. Additionally, the proposed project and the Marina Improvement and Remediation Project would not combine to generate new vehicle trips that would significantly delay public transit. The project site meets the VMT screening criteria under 2050 cumulative

conditions according to the San Francisco Transportation Information Map.[26] Therefore, cumulative impacts with respect to VMT, loading, parking, emergency access, and public transit would all be less than significant.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.7. NOISE. 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?	☐	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐	☐
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?	☐	☐	☐	☐	☒

The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. Therefore, Topic E.7(c) is not applicable to the proposed project.

Comments received in response to the NOP regarding the proposed project's potential impacts to noise expressed concerns regarding the duration of construction noise if construction activities take longer than described. Additional comments expressed concerns that noise from loading docks on residential streets are likely to impact the neighborhood and that traffic along Bay Street will increase noise in the surrounding neighborhood.

Impact NO-1: **The proposed project would not generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the proposed project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (*Less than Significant*)**

[26] https://sfplanninggis.org/TIM/

The project site is located in a dense residential neighborhood of San Francisco, with associated relatively high ambient noise levels, at or exceeding 70 dBA L_{dn}[27], along the Bay Street frontage and at or exceeding 65 dBA L_{dn} along the Laguna Street and Francisco Street frontages, as shown in Figure 4.5-2 of the San Francisco Housing Element 2022 Update EIR.[28] Ambient noise in San Francisco is largely generated by traffic-related sources. Noise levels between 60 and 70 dBA L_{dn} are considered conditionally acceptable for residential uses, and between 62.5 and 70 dBA L_{dn} for uses including nursing homes, per the Land Use Compatibility Chart for Community Noise in the San Francisco General Plan.[29]

Land uses in the surrounding area that contribute to ambient noise include a mixture of recreation and open space and residential uses. The Moscone Softball fields are located to the west across Laguna Street, and Upper Fort Mason is to the north across Bay Street. However, the primary noise source in the area is from vehicles. Existing noise sensitive receptors surrounding the project site include adjacent single- and multi-family residences to the east on the same block, residences to the south across Francisco Street, and residences to the northwest opposite the intersection of Bay and Laguna streets.

Construction Impacts

Construction noise in the City is regulated by the San Francisco Noise Ordinance (Article 29 of the San Francisco Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools (e.g., jackhammers, hoe rams, impact wrenches) must have manufacturer-recommended and City-approved mufflers for both intake and exhaust. Section 2908 of the noise ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m. if noise would exceed the ambient noise level by 5 dBA at the project property line unless a special permit is authorized by the Director of the Department of Public Works or the Director of Building Inspection. The proposed project would be required to comply with regulations set forth in the noise ordinance. The proposed project would not use pile drivers or conduct construction work at night.

Demolition, excavation, and construction would cause a temporary increase in noise levels in the project vicinity. Construction equipment would generate noise that could be considered an annoyance by occupants of nearby properties and residents at the project site. The construction period would last approximately 29 months. Construction noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and affected receptor, and the presence (or absence) of barriers. Impacts would generally be limited to demolition and the periods during which new foundations and exterior structural and façade elements are constructed. Interior construction noise would be substantially reduced by exterior walls.

There would be times when noise could interfere with indoor activities in nearby residences. The nearest offsite sensitive receptors to the project site are the residential uses immediately adjacent to the east with the closest structures, 1536-1538 Francisco Street and 1435 Bay Street, at a distance of approximately 12 feet from the property line. These uses, as well as project site residents, would experience the greatest increase in temporary and intermittent noise associated with construction activities. The project sponsor

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27 dBA L_{dn} = day-night average noise level over a 24-hour period

28 San Francisco Planning Department. 2022 Housing Element Update Environmental Impact Report, Volume II, page 4.5-12, available at https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=223780540c1a9806ebfec96265e2a452b6e655885d5974efccd84a1b400469ac&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0, accessed July 9, 2024.

29 City of San Francisco. Environmental Protection Element. December 2004. Available at: https://generalplan.sfplanning.org/I6_Environmental_Protection.htm. Accessed June 6, 2024.

indicated that during construction current site occupants would be provided with more frequent private shuttles to outings including picnics, movies, shopping etc. In addition, the project sponsor would partner with local senior day care centers and rent a block of hotel rooms for current occupants to have quiet spaces. The project sponsor would also provide noise cancelling headphones to residents that would rather stay in their suites during these times, to minimize construction noise disruptions to Heritage on the Marina residents.

As discussed in the Noise section of the Housing Element EIR, pg. 4.5-37, in general construction noise impacts are not considered significant for projects that meet the following screening criteria and therefore do not require quantitative analysis of construction noise:

- The project would involve the use of standard construction equipment that would comply with section 2907 of the noise ordinance and would not include the use of impact equipment (e.g., hoe rams or pile drivers) that would affect one or more sensitive receptors for a period of 14 days or more within a 90-day period.
- New construction would have a building height of less than 85 feet.
- Demolition, site preparation, excavation, foundation work, and shoring would occur for less than 12 months.
- Night work would occur for no more than three consecutive nights or up to nine nights within a 90-day period.

As discussed above, the proposed project would be required to comply with the noise ordinance and does not propose the use of impact equipment. The project also does not propose the construction of a building taller than 85 feet. Demolition, site preparation, excavation, foundation, and shoring work would occur for approximately five months, and no nighttime construction is proposed. Thus, the proposed project meets the above screening criteria and therefore quantitative analysis of construction noise impacts is not required. Nevertheless, the following discussion provides quantitative information of the magnitude of noise levels that could occur during the noisiest phase of construction.

The noisiest phases of construction would occur for a duration of approximately five weeks, during demolition of the pavement/site preparation, grading, and foundation work, when equipment would include a loader, a bulldozer, a tractor, and an excavator. Noise levels from demolition, grading, and foundation work using various types of equipment were evaluated in the Housing Element EIR for a range of building types using the planning department's standard methodology established by the Federal Transit Administration (FTA). In accordance with FTA construction noise guidance, the construction noise assessment assumes the simultaneous operation of the two loudest pieces of equipment in the center of the site, relative to receptors at specified distances from the noise source. As shown in Table 4.5-12 of the Housing Element EIR, noise levels during the demolition phase assuming operation of a bulldozer and loader could be as high as 89 dBA L_{eq}[30] at 25 feet and would be reduced to 83 dBA L_{eq} at 50 feet and 77 dBA L_{eq} at 100 feet. Therefore, there would be times when construction noise levels would exceed 10 dBA or greater above the ambient noise level and would be clearly noticeable to receptors. A change in noise levels of 10 dB is perceived by the human ear as a doubling of the sound level. However, the two noisiest pieces of

[30] dBA L_{eq} =average a-weighted decibels

construction equipment required for the demolition phase would not be operating simultaneously for the entire duration of demolition activities.

Overall, of the 29-month construction duration, the demolition, site preparation and grading, and foundation and shoring work would occur for approximately five months. Additionally, construction noise levels would be temporary and would not persist upon completion of construction activities. Furthermore, in accordance with the noise ordinance, noise levels from individual pieces of construction equipment would not exceed 80 dBA at a distance of 100 feet from the source. Therefore, construction noise impacts would be less than significant, and no mitigation is required.

Operational Impacts

The existing use at the project site would not change. In total, the proposed project would add approximately 58,380 square feet of institutional use and increase the number of residential care units by 23 from 86 to 109. The addition of 23 new residential care units and 58,830 square feet of institutional use would generate an increase of 302 average daily vehicle trips on the surrounding roadways.[31] With respect to traffic noise, a 3 dBA increase is barely perceptible to the human ear, while a 5 dBA increase is readily noticeable. An increase of less than 3 dBA from continuous noise sources of similar character is generally not perceptible outside of controlled laboratory conditions; it takes a doubling of traffic volumes to increase noise levels by 3 dBA.[32] Since the average daily traffic on the surrounding roadways are greater than 302 vehicles per day and the project trips would not double the average daily traffic on those road segments, the proposed project's increase in vehicle trips would not result in a perceptible increase in noise. Thus, the proposed project would result in a less than significant traffic noise impact.

The project proposes to remove the existing heating, ventilation, and air conditioning condensers and add a new mechanical system which includes rooftop air-source split system compressors. The system has not been designed, but the compressors can range from 4 to 10 feet in height (depending on the system design). The compressors would be grouped together in screened enclosures, as far away as practical from the roof perimeter along the adjoining streets. The screen enclosure height would match the equipment height. Because the new equipment would be located within a well which contains 10-foot-high walls on all sides and an open-to-sky roof, no noise level increases are expected at surrounding receptors from the proposed new compressors.

Interior space conditioning would rely on a decentralized system of wall mounted, ceiling cassette and ducted air handling units which are not expected to increase noise levels at surrounding receptors. Furthermore, the proposed mechanical systems would be subject to the noise ordinance (article 29 of the police code). Section 2909(b) Commercial and Industrial Property Noise Limits of the police code limits the noise level at commercial and industrial properties to no more than eight dBA above the local ambient at any point outside of the property plane.

The existing emergency backup diesel power generator, located adjacent to the Bay Street frontage, would be replaced by a new Tier 4 emissions emergency backup diesel generator located inside the new Bay Building. All louvers on the exterior of the mechanical rooms would face away from surrounding receptors.

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31 San Francisco Planning Department. Transportation Coordination Memo, 3400 Laguna Street, Heritage on the Marina, 2022-009819ENV. June 7, 2024.

32 California Department of Transportation, *Technical Noise Supplement to the Traffic Noise Analysis Protocol*, pp. 2-44 to 2-45, September 2013. Available: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tens-sep2013-a11y.pdf. Accessed May 1, 2024.

Therefore, due to the placement of mechanical equipment, proposed shielding of the condensers, and that the generator would only be used for emergency purposes and occasional maintenance, the replacement generator would not result in a significant increase in ambient noise levels.

Considering the above, and with required compliance with the noise ordinance, operational noise level impacts from the proposed project would be less than significant and no mitigation measures would be required.

Impact NO-2: The proposed project would generate excessive groundborne vibration or groundborne noise levels. ***(Less than Significant with Mitigation)***

The proposed project would include the demolition of the Perry Building Connector and the Health Care Center, construction of two new buildings in the location of the buildings to be demolished, and the construction of an underground parking garage. These construction activities would directly abut both the Julia Morgan Building and Perry Building and would be within approximately five feet of the Caretaker's Cottage. The nearest offsite vibration-sensitive buildings are the existing single and multi-family homes built in the early 1900s adjacent to the east on the project block. The buildings to remain on the project site are approximately 5feet away from where construction activities would occur. **Table E.7-1, Summary of Surrounding Structures**, below presents a summary of the surrounding buildings that would not be demolished with the proposed project, distance from construction activities, vibration-generating equipment that would be used during construction, and the applicable vibration level that, if exceeded, could result in building damage. Vibration impacts to these buildings in the form of building damage could potentially occur during the demolition and excavation phase, which requires the use of a large bulldozer and loaded trucks, and may require an auger drill. All other construction equipment proposed to be used are not the types of construction equipment that generate substantial groundborne vibration.

Table E.7-1 Summary of Surrounding Structures

Building Name/Location	Distance to Vibration Equipment	Vibration Equipment	Building Category per Caltrans	Applicable Building Damage Criteria
Julia Morgan Building	Less than 5 feet	Large Bulldozer, Drill, Loaded Trucks	A	0.25 in/sec PPV
Perry Building	Less than 5 feet	Large Bulldozer or Drill	A	0.25 in/sec PPV
Caretaker's Cottage	5 feet	Large Bulldozer, Drill, Loaded Trucks	A	0.25 in/sec PPV
1536- 1538 Francisco Street	15 feet	Large Bulldozer, Drill, Loaded Trucks	B	0.25 in/sec PPV
1435 Bay Street	25 feet	Large Bulldozer, Drill, Loaded Trucks	B	0.25 in/sec PPV

Construction activities can produce detectable groundborne vibration at nearby buildings, infrastructure, and sensitive receptors. Vibration intensity is expressed as PPV (peak particle velocity), the maximum speed at which the ground moves while it temporarily shakes. Because ground-shaking speeds are very slow, PPV is measured in inches per second (in/sec). Construction equipment vibration levels are calculated using the following equation:

$$PPV\ (distance\ D) = PPV\ (reference\ at\ 25\ feet) \times (25/D)^{1.5}$$

The value of 1.5, which is variable depending on soil types, is based upon competent soils: most sands, sandy clays, silty clays, gravel, silts, weathered rock (can dig with shovel).

The distance variable, D, is measured in feet. The construction vibration damage criterion for this project is 0.25 PPV (in/sec) due to the presence of adjacent historic structures.[33] The potentially affected buildings on site that would not be demolished with the proposed project include: the Julia Morgan Building, the Perry Building, and the Caretaker's Cottage. The potentially affected off site buildings include the 1536-1538 Francisco Building and the 1435 Bay Street Building, which are directly adjacent to the project site.

Table E.7-2, Construction Equipment Vibration Levels at Various Distances, shows the vibration levels for the three pieces of equipment proposed during construction that could generate groundborne vibration: large bulldozer, loaded trucks and an auger drill at distances of 5, 10, 15, and 25 feet based on Housing Element Table 4.5-16, and consistent with the Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual.[34]

Table E.7-2 Construction Equipment Vibration Levels at Various Distances

Equipment	Peak Particle Velocity (in/sec)			
	5 Feet	10 Feet	15 Feet	25 Feet
Large Bulldozer	0.995	0.352	0.191	0.089
Auger Drilling	0.995	0.352	0.191	0.089
Loaded Trucks	0.850	0.300	0.164	0.076

Source: U.S. Department of Transportation, Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Report No. 0123, September 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed April 16, 2021.
Notes: Vibration source levels are from Federal Transit Administration, 2018, except where noted.
in/sec = inches per second.

Although a complete list of construction equipment has not yet been confirmed for the project, it is known with certainty that impact pile driving and caisson drilling are not proposed. As shown in Table E.7-2, project construction equipment would generate vibration levels greater than the 0.25 in/sec PPV damage criteria at a distance out to approximately 15 feet from the operation of the project's vibration-causing construction equipment.

[33] California Department of Transportation (Caltrans), 2020. Transportation and Construction Vibration Guidance Manual. April.

[34] Federal Transit Administration (FTA), 2018. Transit Noise and Vibration Impact Assessment Manual. Office of Planning and Environment. Report No. 0123. September.

The nearest off-site uses are residences located a minimum of 12 feet from the property line. The existing project site buildings along the east property line (the Caretaker's Cottage and the Perry Building) would remain in place, therefore none of the equipment identified in Table E.7-2 would operate within 15 feet of the offsite residences and project construction would not have the potential to generate vibration levels that would impact off-site structures.

However, it is likely the building damage criterion of 0.25 in/sec PPV would be exceeded at the existing on-site buildings that would remain under the proposed project. As shown in Table E.7-1, vibration generating equipment could operate within 5 feet of the remaining on-site buildings. As shown in Table E.7-2, at a distance of 5 feet, vibration generating equipment would exceed the building damage criterion of 0.25 in/sec PPV. As such, construction equipment would have the potential to result in a significant impact to on-site buildings. **Mitigation Measure M-NO-1, Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction** would be required.

Mitigation Measure M-NO-1: **Protection of Adjacent Buildings/Structures and Vibration Monitoring During Construction.** Prior to issuance of a Pre-Construction Environmental Compliance letter, the project sponsor shall submit a project specific Pre-construction Survey and Vibration Management and Monitoring Plan to the ERO or the ERO's designee for approval. The plan shall identify all feasible means to avoid damage to potentially affected buildings on the project site. The potentially affected buildings on site include the Julia Morgan Building, the Perry Building, and the Caretaker's Cottage. The project sponsor shall ensure that the following requirements of the Pre-Construction Survey and Vibration Management and Monitoring Plan are included in contract specifications, as necessary.

Pre-construction Survey. Prior to the start of any ground-disturbing activity, the project sponsor shall engage a consultant to undertake a pre-construction survey of the on-site potentially affected buildings. For the Perry Building, which is not a historic resource, a structural engineer or other professional with similar qualifications shall document and photograph the existing conditions of the building. The project sponsor shall submit the survey to the ERO or the officer's designee for review and approval prior to the start of vibration-generating construction activity.

For the Julia Morgan Building and the Caretaker's Cottage, which are historic, the project sponsor shall engage a qualified historic preservation professional and a structural engineer or other professional with similar qualifications to undertake a pre-construction survey of the historic buildings. The pre-construction survey shall include descriptions and photograph of all identified historic buildings including all façades, roofs, and details of the character-defining features that could be damaged during construction, and shall document existing damage, such as cracks and loose or damaged features. The report shall also include pre-construction drawings that record the pre-construction condition of the buildings and identify cracks and other features to be monitored during construction. The

qualified historic preservation professional shall be the lead author of the pre-construction survey. The pre-construction survey shall be submitted to the ERO for review and approval prior to the start of vibration-generating construction activity.

Vibration Management and Monitoring Plan. The project sponsor shall undertake a monitoring plan to avoid or reduce project-related construction vibration damage to potentially affected buildings and/or structures and to ensure that any such damage is documented and repaired. Prior to issuance of a Pre-Construction Environmental Compliance Letter, the project sponsor shall submit the Plan to the ERO for review and approval. The Vibration Management and Monitoring Plan shall include, at a minimum, the following components, as applicable:

- **Maximum Vibration Level.** Based on the anticipated construction and condition of the affected buildings and/or structures, a qualified acoustical/vibration consultant in coordination with a structural engineer (or professional with similar qualifications) and, in the case of potentially affected historic buildings/structures, a qualified historic preservation professional, shall establish a maximum vibration level that shall not be exceeded at each building/structure, based on existing conditions, character-defining features, soil conditions, and anticipated construction practices (common standards are a peak particle velocity [PPV] of 0.25 inch per second for historic and some old buildings, a PPV of 0.3 inch per second for older residential structures, and a PPV of 0.5 inch per second for new residential structures and modern industrial/commercial buildings).

- **Vibration-generating Equipment.** The plan shall identify all vibration-generating equipment to be used during construction (including, but not limited to: site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction).

- **Alternative Construction Equipment and Techniques.** The plan shall identify potential alternative equipment and techniques that could be implemented if construction vibration levels are observed in excess of the established standard (e.g., smaller, lighter equipment could be used in some cases).

- **Buffer Distances.** The plan shall identify buffer distances to be maintained based on vibration levels and site constraints between the operation of vibration-generating construction equipment and the potentially affected buildings and/or structures to avoid damage to the extent possible.

- **Vibration Monitoring.** The plan shall identify the method and equipment for vibration monitoring to ensure that construction vibration levels do not exceed the established standards identified in the plan.

    - Should construction vibration levels be observed in excess of the standards established in the plan, the contractor(s) shall halt construction and put alternative construction techniques identified in the plan into practice, to the extent feasible.

    - The qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures) shall inspect each affected building and/or structure in the event the construction activities exceed the vibration levels identified in the plan.

    - The structural engineer and/or historic preservation professional shall submit monthly reports to the ERO during vibration-inducing activity periods that identify and summarize any vibration level exceedances and describe the actions taken to reduce vibration.

    - If vibration has damaged nearby buildings and/or structures that are not historic, the structural engineer shall immediately notify the ERO and prepare a damage report documenting the features of the building and/or structure that has been damaged.

    - If vibration has damaged nearby buildings and/or structures that are historic, the historic preservation consultant shall immediately notify the ERO and prepare a damage report documenting the features of the building and/or structure that has been damaged.

    - Following incorporation of the alternative construction techniques and/or planning department review of the damage report, vibration monitoring shall recommence to ensure that vibration levels at each affected building and/or structure are not exceeded.

- **Periodic Inspections.** The plan shall identify the intervals and parties responsible for periodic inspections. The qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures) shall conduct regular periodic inspections of each affected building and/or structure during vibration-generating construction activity on the project site. The plan will specify how often inspections shall occur.

- **Repair Damage.** The plan shall also identify provisions to be followed should damage to any building and/or structure occur due to construction-related vibration. The building(s) and/or structure(s) shall be remediated to their pre-construction condition at the conclusion of vibration-generating activity on the site. For historic resources, should damage occur to any building and/or structure, the building and/or structure shall be restored to its pre-construction condition in consultation with the qualified historic preservation professional and planning department preservation staff.

Vibration Monitoring Results Report. After construction is complete, the project sponsor shall submit to the ERO a final report from the qualified historic preservation professional (for effects on historic buildings and/or structures) and/or structural engineer (for effects on historic and non-historic buildings and/or structures). The report shall include, at a minimum, collected monitoring records, building and/or structure condition summaries, descriptions of all instances of vibration level exceedance, identification of damage incurred due to vibration, and corrective actions taken to restore damaged buildings and structures. The ERO shall review and approve the Vibration Monitoring Results Report.

Mitigation Measure M-NO-1 would require the project sponsor to conduct a pre-construction assessment of potentially affected buildings and/or structures, establish vibration limits not to be exceeded based on the condition of the building(s) and/or structure(s), monitor vibration levels during construction, and repair any vibration-related damage to the building's/structure's pre-construction condition. Therefore, with implementation of Mitigation Measure M-NO-1, the impact of future development under the proposed action to result in structural damage from construction vibration would be reduced to less than significant.

Impact C-NO-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on noise or vibration. ***(Less than Significant)***

As analyzed above, the project would not have significant impacts on adjacent noise sensitive uses resulting from construction or operational noise. However, the proposed project would result in vibration levels that could cause damage to the onsite buildings that would remain under the proposed project, resulting in a significant impact.

The nearest cumulative project is the Marina Improvement and Remediation Project located along the north waterfront between Laguna and Baker streets, composed of East Harbor (Gashouse Cove) and West Harbor. That project includes investigation and remediation of sediments in East Harbor impacted by a former gas plant, to be conducted by PG&E under the oversight of State of California environmental regulatory agencies. Due to the distance between the proposed project and the Marina Improvement and Remediation project, approximately 830 feet, in addition to attenuation of noise provided by intervening structures, and because all construction activities are regulated by the noise ordinance, construction noise from the proposed project would not combine with that of the Marina Improvement and Remediation project to result in a significant cumulative construction noise impact. Additionally, because the proposed project

would generate a very small number of vehicle trips, approximately 302 daily vehicle trips, it would not combine with potential vehicle trips generated by the Marina Improvement and Remediation project to result in a significant cumulative traffic noise impact. With respect to stationary noise sources, because the proposed project's stationary noise sources would not generate substantial noise increases and all stationary noise sources are regulated by the noise ordinance, cumulative stationary source noise impacts would also not be significant. Lastly, because vibration impacts generated during construction attenuate rapidly with distance from the vibration source, cumulative construction vibration impacts would be less than significant.

Therefore, the proposed project would not have the potential to combine with nearby projects to result in cumulative noise and vibration impacts and no mitigation measures are required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.8. AIR QUALITY. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
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?	☒	☐	☐	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐	☐

The Bay Area Air Quality Management District (or air district) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (air basin), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa counties and portions of Sonoma and Solano counties. 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, respectively. Specifically, 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, generally. The most recent air quality plan, the 2017 clean air plan, was adopted by the air district on April 19, 2017. The clean air plan updates the most recent Bay Area ozone plan and the 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 (GHGs) in a single, integrated plan; and establish emission control measures to be adopted or implemented. The 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 (TACs); and
- **Protect the Climate:** Reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The 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 air quality plans.

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 (NO_2), sulfur dioxide (SO_2), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the air basin experiences low concentrations of most pollutants when compared to federal or state standards. The air basin is designated as either in attainment[35] or unclassified for most criteria pollutants with the exception of ozone, $PM_{2.5}$, and PM_{10}[36], for which these pollutants are designated as non-attainment for either the state or federal standards. 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.[37]

Land use projects typically result in reactive organic gases (ROG) and oxides of nitrogen (NO_X), which are ozone precursors, and particulate matter emissions because of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. For this reason, the air district has established significance thresholds for non-attainment criteria air pollutants, as shown in **Table E.8-1, Criteria Air Pollutant Significance Thresholds**.

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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 Airborne particulate matter (PM) is not a single pollutant, but rather is a mixture of many chemical species. It is a complex mixture of solids and aerosols composed of small droplets of liquid, dry solid fragments, and solid cores with liquid coatingsPM_{10} and $PM_{2.5}$ often derive from different emissions sources, and also have different chemical compositions. Emissions from combustion of gasoline, oil, diesel fuel or wood produce much of the $PM_{2.5}$ pollution found in outdoor air, as well as a significant proportion of PM_{10}. PM_{10} also includes dust from construction sites, landfills and agriculture, wildfires and brush/waste burning, industrial sources, wind-blown dust from open lands, pollen and fragments of bacteria.

37 Bay Area Air Quality Management District (air district), *California Environmental Quality Act Thresholds and Guidelines Update,* April 2023. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed April12, 2024.

Table E.8-1 Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs/day)	Average Daily Emissions (lbs/day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO_X	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Best Management Practices	Not Applicable	

Source: California Environmental Quality Act Thresholds and Guidelines Update, page 3-4 (Bay Area Air Quality Management District, April 2023).
lbs/day = pounds per day
tons/year = tons per year

The significance thresholds for 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 in Table E.8-1 must offset those emissions. The significance thresholds for particulate matter are based on the emissions limit in the federal New Source Review for stationary sources in nonattainment areas. The air district's California Environmental Quality Act Air Quality Guidelines[38] and supporting materials[39] provide additional evidence to support these thresholds. 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.[40] Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Fugitive Dust

Additionally, fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices at construction sites significantly control fugitive dust and individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.[41] The air district has identified a number of best management practices to control fugitive dust emissions from construction activities.[42] The City's Construction Dust Control Ordinance (Ordinance No. 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust 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.

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38 Ibid.

39 Bay Area Air Quality Management District, *Air Quality Guidelines Appendix A: Thresholds of Significance Justification*, April 2023. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-a-thresholds-of-significance-justification_final-pdf.pdf?rev=d35960ec035546629124ae2a25fb1df9&sc_lang=en. Accessed April 12, 2024.

40 Bay Area Air Quality Management District, *California Environmental Quality Act Thresholds and Guidelines Update*, April 2023.

41 Western Regional Air Partnership. 2006. WRAP Fugitive Dust Handbook. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf, accessed April 12, , 2024.

42 Bay Area Air Quality Management District, California Environmental Quality Act Thresholds and Guidelines Update, April 2023.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer 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.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the air district using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.[43] Exposures to fine particulate matter ($PM_{2.5}$) are strongly associated with mortality, respiratory diseases, and decreased lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.[44] In addition to $PM_{2.5}$, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (California air board) identified diesel particulate matter as a toxic air contaminant in 1998, primarily based on evidence demonstrating cancer effects in humans.[45] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 7 days a week, for 30 years.[46] Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

In an effort 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 located within the air pollutant exposure zone.

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43 In general, a health risk assessment is required if the air district concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

44 San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

45 California Air Resources Board, Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

46 California Office of Environmental Health Hazard Assessment, Air Toxics Hot Spot Program Risk Assessment Guidelines, February, 2015. Pg. 4-44, 8-6.

The above citywide health risk modeling is referenced in the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments or Health Code, article 38 (Ordinance No. 224-14, effective December 8, 2014) (article 38). The purpose of article 38 is to protect the public health and welfare by establishing an air pollutant exposure zone and imposing an enhanced ventilation requirement for all urban infill sensitive use development within the zone.

The project site is located within the air pollutant exposure zone; therefore, health code article 38 applies to the proposed project.[47] The project sponsor submitted an application to the public health department on March 14, 2023, in accordance with the health code.[48] In addition, projects within the air pollutant exposure zone require special consideration to determine whether the project's activities would add a substantial amount of emissions to areas already adversely affected by poor air quality.

Comments received in response to the NOP regarding the proposed project's potential air quality impacts expressed concerns regarding construction and excavation exposure to vulnerable populations in nearby open spaces or recreational facilities. Additional comments expressed concerns regarding increased air pollution from generator use and loading docks exhausts as well as ambient air pollution.

Impact AQ-1: The proposed project would not conflict with or obstruct implementation of the applicable air quality plan. ***(Less than Significant)***

The most recently adopted air quality plan for the air basin is the air district's 2017 clean air plan.[49] The clean air plan is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the clean air plan, this analysis considers whether the 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 primary goals of the clean air plan are to: (1) protect air quality and health at the regional and local scale; (2) eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and (3) protect the climate by reducing greenhouse gas emissions. To meet the primary goals, the 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. Other measures in the plan not within the air district's regulatory authority may be advisory or are otherwise not specifically applicable to land use development projects.

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47 San Francisco Public Health Code, Article 38, https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_health/0-0-0-59248, accessed May 24, 2024. The development of two new residential care facility buildings qualifies as a "sensitive use" under article 38, defined in California Building Code Section 310.3.1 Residential Group R-2.1.

48 San Francisco Department of Public Health, Application for Article 38 Compliance Assessment for 3400 Laguna Street, March 14, 2023.

49 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 April 12, 2024.

The clean air plan recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options.

The clean air plan measures most applicable to the proposed project are transportation, energy and climate control measures. Transportation control measures that are identified in the clean air plan are implemented by the San Francisco General Plan and the planning code, for example, through the City's Transit First Policy, transportation demand management program requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the clean air plan. The proposed project's impact with respect to GHGs are discussed in Section D.8, Greenhouse Gas Emissions, which demonstrates that the proposed project would comply with the applicable provisions of the City's GHG reduction strategy. Therefore, the proposed project would include applicable control measures identified in the clean air plan to meet the plan's primary goals.

Examples of a project that could cause the disruption or delay of clean air plan control measures are projects that would substantially increase automobile trips, preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project would result in the expansion and renovation of an existing residential care facility through the demolition of two existing buildings and construction of two new buildings, as well as renovation of two of the three remaining buildings, resulting in an addition of approximately 58,380 square feet of institutional use and an increase in the number of residential care units by 23 from 86 to 109. With approximately 302 net new daily vehicle trips, the proposed project would not substantially increase vehicle trips or increase VMT. To accommodate the expanded use, the project would add 19 on-site parking spaces, the majority of which would be included in the new basement-level garage. Additionally, the project would remove an additional eight on-street parking spaces for required bulb-outs on the corners of Laguna and Francisco streets and Laguna and Bay streets, as required by planning code section 138.1.The project would remove one on-street 22-foot-long passenger loading space along the project site's Francisco Street frontage and the associated approximately 18-foot-wide curb cut, and add one on-street parking space. The proposed number of parking spaces is not considered excessive, and the project would not preclude the extension of a transit line or bike path.

For the reasons described above, the proposed project would not interfere with or obstruct implementation of the clean air plan; therefore, this impact would be less than significant, and no mitigation would be required.

Impact AQ-2: The proposed project's construction activities may result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin. (*Potentially Significant*)

Project-related air quality impacts fall into two categories: short-term impacts from construction and long-term impacts from project operation. Construction of the proposed project has the potential to result in significant impacts on air quality.[50] Accordingly, this topic is analyzed in the EIR under Impact AQ-2.

[50] San Francisco Planning Department, *Air Quality Screening Form, 3400 Laguna Street, 2022-009819ENV*. July 5, 2023.

Impact AQ-3: The proposed project's operational activities would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants within the air basin. (*Less than Significant*)

Land use projects typically result in emissions of criteria air pollutants primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants from the combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses criteria air pollutant impacts resulting from operation of the proposed project.

To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table E.8-1 above, the air district developed screening criteria.[51] If a proposed project meets the screening criteria, then operation of 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 significance thresholds. The CEQA Air Quality Guidelines note that the screening levels are generally representative of new development on greenfield[52] 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 would result in the expansion and renovation of an existing residential care facility through the demolition of two existing buildings and construction of two new buildings, as well as renovation of two of the three remaining buildings, resulting in an addition of 58,380 square feet of institutional use and an increase in the number of residential care suites by 23 from 86 to 109. The proposed project would be below the criteria air pollutant operational screening size of 1,008 dwelling unit of congregate care/retirement community land uses as identified in the air district's CEQA Air Quality Guidelines. Thus, quantification of project-generated operational criteria air pollutant emissions is not required, and the proposed project would not exceed any of the significance thresholds for operational criteria air pollutants and would result in a less-than-significant impact with respect to criteria air pollutants. No mitigation would be required.

Impact AQ-4: The proposed project may expose sensitive receptors to substantial pollutant concentrations. *(Potentially Significant)*

As discussed above, the project site is within an air pollutant exposure zone; therefore, the existing background health risks at the project site and vicinity are substantial. The proposed project would generate a negligible amount of TACs during operation from the approximately 302 new daily vehicle trips and any additional truck trips to the site. The proposed project includes a new Tier 4 backup emergency generator,

[51] Bay Area Air Quality Management District (air district), *California Environmental Quality Act Thresholds and Guidelines Update,* April 2023. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed April 12, 2024.

[52] A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

to replace the existing on-site generator which is approximately 25 years old.[53] The new generator would be of approximately the same size and in the same location and within the proposed Bay Street building. Thus, the replacement generator would not increase TACs above existing conditions. However, the proposed project would generate TACs during construction from the use of diesel-powered construction equipment; therefore, the proposed project has the potential to expose sensitive receptors to substantial pollutant concentrations, i.e., health risks.[54] Accordingly, this topic is analyzed further in the EIR under Impact AQ-4.

Impact AQ-5: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. ***(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. Additionally, the proposed construction and renovation of the existing residential care facility would not create a significant source of new odors. As such, odor impacts would be less than significant, and no mitigation measures would be required.

Cumulative Impacts

As discussed above, 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 nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.[55] The project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, construction-period cumulative criteria pollutant emissions are evaluated in the EIR under Impact AQ-2 and operation-period cumulative criteria air pollutant analysis is presented in Impact AQ-3. As such, no separate cumulative criteria air pollutant analysis is required. Operational criteria air pollutant impacts were determined to be less than significant, and no mitigation measures are required.

Impact C-AQ-4: The proposed project, in combination with cumulative projects, may expose sensitive receptors to substantial pollutant concentrations. ***(Potentially Significant)***

As previously discussed, the project site is located in an area that already experiences poor air quality. The proposed project would generate TACs during construction from the use of diesel-powered construction equipment. The proposed project would also generate a negligible amount of TACs during operation from the approximately 34 new daily vehicle trips and any additional truck trips to the site. Cumulative health risk impacts are addressed in the draft EIR under Impact C-AQ-4.

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53 Charles Pankow Builders, LTD, *Generator Description*, October 18, 2023.

54 San Francisco Planning Department, *Air Quality Screening Form, 3400 Laguna Street, 2022-009819ENV.* July 5, 2023.

55 Bay Area Air Quality Management District, *CEQA Air Quality Guidelines,* May 2017, page 2-1.

Impact C-AQ-5: The proposed project, in combination with cumulative projects, would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. ***(Less than Significant)***

The proposed project and the Marina Improvement and Remediation Project, approximately 830 feet from the proposed project, would generate some odors during construction, but odors would be temporary. Upon completion of construction activities this project combined with the proposed project would not generate substantial odors. Therefore, cumulative odor impacts would be considered less than significant, and no mitigation measures would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.9. GREENHOUSE GAS EMISSIONS. Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐	☐

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.[56] 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, maintains the air district's previous GHG threshold that 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

[56] Bay Area Air Quality Management District, CEQA Thresholds and Guidelines Update. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: April 12, 2024.

2023 GHG Reduction Strategy Update[57] 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 48 percent reduction in GHG emissions in 2020 compared to 1990 levels,[58] which far exceeds the goal of 2020 GHG emissions equaling those in 1990 set in Executive Order S-3-05[59] and the California Global Warming Solutions Act.[60] The City has also met and exceeded the 2030 target of 40 percent reduction below 1990 levels set in the California Global Warming Solutions Act of 2016[61] and the air district's 2017 Clean Air Plan[62] more than 10 years before the target date.

San Francisco's GHG reduction goals, updated in July 2021 by ordinance 117-02,[63] are consistent with, or more aggressive than, the long-term goals established under executive orders S-3-05,[64] B-30-15,[65] B-55-18,[66] and the California Global Warming Solutions Act of 2016.[67] 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.[68] 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 requires 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

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57 San Francisco Planning Department, *2023 Greenhouse Gas Reduction Strategy Update,* Revised October 2023. Available: https://sfplanning.org/project/greenhouse-gas-reduction-strategies#info. Accessed: April 12, 2024,.

58 San Francisco Department of the Environment, *San Francisco's 2019 Carbon Footprint*. Available: https://sfenvironment.org/carbonfootprint. Accessed: April 12, 2024.

59 Office of the Governor, Executive Order S-3-05, June 1, 2005. Available: https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf. Accessed: April 12, 2024.

60 California Legislative Information, Assembly Bill 32, September 27, 2006. Available: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf. Accessed: April 12, 2024.

61 California Legislative Information, Senate Bill 32, September 8, 2016. Available: http://www.leginfo.ca.gov/pub/15-16/bill/sen/sb_0001-0050/sb_32_bill_20160908_chaptered.htm. Accessed: April 12, 2024.

62 Bay Area Air Quality Management District. 2017. Clean Air Plan. September 2017. Available: http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans. Accessed: April 12, 2024.

63 San Francisco Board of Supervisors. *Ordinance No. 117-21, File No. 210563*. July 20, 2021. Available: https://sfbos.org/sites/default/files/o0117-21.pdf. Accessed: April 12, 2024. 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.

64 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.

65 Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available: https://www.ca.gov/archive/gov39/2015/04/29/news18938/. Accessed: April 12, 2024. 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.

66 Office of the Governor, *Executive Order B-55-18*, September 18, 2018. Available: https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf. Accessed: April 12, 2024. 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.

67 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.

68 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.

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, 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.

Comments received in response to the NOP concerned the proposed project's increased GHG emissions from generator use. Additional comments included concerns about the scale of the increased carbon footprint in exchange for a small number of new residential care suites, as well as a recommendation for the project to achieve a LEED zero certification.

Impact C-GG-1: The proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. ***(Less than Significant)***

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.[69] For example, the proposed project would comply with the City's Commuter Benefits Ordinance and bicycle parking requirements and would implement a Transportation Demand Management (TDM) Program, reducing the proposed project's transportation-related emissions. These regulations reduce GHG emissions from single-occupancy vehicles by promoting the use of alternative transportation modes with zero or lower GHG emissions on a per capita basis.

The proposed project would also be required to comply with the energy efficiency requirements of the San Francisco green building code, stormwater management ordinance, water efficient irrigation ordinance, existing commercial buildings energy performance ordinance, and light pollution reduction requirements which would promote energy and water efficiency, thereby reducing the proposed project's energy-related GHG emissions.[70] The project would replace natural gas connections for institutional kitchens and the heating, ventilation and cooling system with electric for both the new buildings and the Julia Morgan and Perry buildings, which would further lower the proposed project's GHG emissions and would be consistent with City regulations that no new natural gas connection be constructed.

The proposed project's waste-related emissions would be reduced through compliance with the City's recycling and composting ordinance and construction and demolition debris recovery ordinance. These regulations reduce the amount of materials sent to a landfill, reducing GHGs emitted by landfill operations.

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69 San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for the Heritage on the Marina Project, 3400 Laguna Street, November 27, 2023.

70 Compliance with water conservation measures reduce the energy (and GHG emissions) required to convey, pump and treat water required for the project.

These regulations also promote reuse of materials, conserving their embodied energy[71] and reducing the energy required to produce new materials.

Compliance with the City's street tree planting requirements would serve to increase carbon sequestration. In the case of the proposed project, there would be six additional street trees added along the project site's Laguna Street frontage, as required per public works code section 806. Additionally, the project would result in a net increase of nine trees on the project site. Other regulations, including those requiring low-emitting finishes would reduce volatile organic compounds.[72] Thus, the proposed project was determined to be consistent with San Francisco's GHG reduction strategy.

As discussed above, these regulations have proved effective as San Francisco has reduced its GHG emissions by 48 percent below 1990 levels, which far exceed statewide and regional 2020 GHG reduction targets. Furthermore, the City's GHG emission reductions in 2020 also met statewide and regional 2030 targets 10 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 not generate significant GHG emissions nor conflict with state, regional, and local GHG reduction plans and regulations. As such, the proposed project's GHG emissions impact would be less than significant, and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.10. WIND. Would the project:					
a) Create wind hazards in publicly accessible areas of substantial pedestrian use?	☐	☐	☒	☐	☐

Impact WI-1: The proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use. ***(Less than Significant)***

To determine whether a project would alter wind in a manner that substantially affects public areas, the planning department applies the wind hazard criterion established in section 148, Reduction of Ground-Level Wind Currents of the San Francisco Planning Code. In accordance with section 148, a project would

[71] Embodied energy is the total energy required for the extraction, processing, manufacture and delivery of building materials to the building site.

[72] While not a GHG, volatile organic compounds are precursor pollutants that form ground level ozone. Increased ground level ozone is an anticipated effect of future global warming that would result in added health effects locally. Reducing volatile organic compound emissions would reduce the anticipated local effects of global warming.

result in hazardous wind conditions if it would cause ground-level wind speeds that exceed 26 mph for one hour or more per year.[73]

In general, new buildings less than approximately 85 feet in height are unlikely to result in substantial adverse effects on ground-level winds. Such winds may exist under existing conditions, but shorter buildings typically do not cause substantial changes in ground-level winds. Therefore, wind studies are not required for buildings under 85 feet in height.

The proposed project would not include new built structures of sufficient height or mass to amplify or redirect winds resulting in wind hazards for pedestrians. The proposed project would result in demolition of two of the five existing buildings on the project site (the Perry Connector and the Health Care Center) and construction of two new buildings (the Bay Building and the Francisco Building) at heights not to exceed 40 feet and in the same locations as the demolished structures. The proposed project would also renovate two of the other three existing buildings on the site, but the renovations do not include an increase in building height. Other new building features or changes to open space, including a basement level garage, would be at or below grade and would not affect local wind patterns. Therefore, the proposed project would have a less-than-significant impact on wind hazards in publicly accessible areas of pedestrian use. 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. ***(No impact)***

There are no actively planned projects within the vicinity of the project site that would contribute to cumulative wind impacts and the project itself would not contribute to a wind hazard. The only cumulative project in the vicinity of the project site is the Marina Improvement and Remediation Project, which includes investigation and remediation of sediments in East Harbor. Therefore, the proposed project would have no cumulative impacts on wind, and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.11. SHADOW. Would the project:					
a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	☐	☐	☒	☐	☐

[73] San Francisco Planning Code Section 148. Available at: http://library.amlegal.com/nxt/gateway.dll/California/planning/article12dimensionsareasandopenspaces?f=templates$fn=default.htm$3.0$vid=amlegal:sanfrancisco_ca$anc=JD_138.1.

Comments received in response to the NOP regarding potential impacts from new shadow included concerns over how the new project buildings would shadow Fort Mason, Moscone Field, the Julia Morgan building, and other residences in the neighborhood. Additional comments included a request for a full shadow study to be conducted.

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)***

Planning code section 295, Height Restrictions on Structures Shadowing Property Under the Jurisdiction of the Recreation and Park Commission, generally prohibits new structures taller than 40 feet that would cast additional shadows on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission between one hour after sunrise and one hour before sunset, at any time of the year, unless that shadow would not result in a significant adverse effect on the use of the open space.

The criterion the City has adopted for determining the significance of shadow impacts under CEQA is whether the proposed project would create new shadow in a manner that substantially and adversely affects outdoor recreation facilities or other public areas, regardless of whether those facilities or areas are protected by planning code section 295 (i.e., under jurisdiction of public entities other than the San Francisco Recreation and Park Commission or privately owned and publicly accessible open space). In addition, as under planning code section 295, the CEQA analysis of shadow impacts takes into account the use of the open space; the time of day and year of project shadow; the physical layout and facilities affected; the intensity, size, shape, and location of the shadow; and the proportion of open space affected.

The proposed project would demolish two of the five existing buildings (the Perry Connector and the Health Care Center) and construct two new buildings (the Bay Building and the Francisco Building) at heights not to exceed 40 feet and in the same locations as the demolished structures. The proposed project would also renovate two of the other three existing buildings on the site, but the renovations do not include an increase in building height. The Moscone Recreation Center is across Laguna Street to the west and Upper Fort Mason is across Bay Street to the north of the project site. The Moscone Recreation Center is under the jurisdiction of the San Francisco Recreation and Park Commission and Upper Fort Mason is operated by the Golden Gate National Parks Conservancy and is part of the federal Golden Gate National Recreation Area.

The planning department acknowledges that shadows may result from buildings 40 feet tall or less; however, such shadows are to be tolerated, as reflected in planning code section 295 and the planning department's standard methodology for CEQA shadow analysis, in which shadow analysis may be required only if the proposed project exceeds 40 feet in height.

The new four-story Francisco Building on the Francisco Street frontage would be located mid-block and set back from the Laguna Street frontage and the existing Julia Morgan Building. Any new shadows cast from the new Francisco Building onto the Moscone Recreation Center property would be limited to the morning hours mostly during the winter months and would only reach the edge of the facility, where there is a walking path that is already shaded by mature vegetation throughout the day. On the Bay Street side, the new Bay Building would not cast new shadows onto this facility because it would be further set back from the Laguna Street frontage and there is an existing large mature tree at the corner of Bay and Laguna streets

that is taller than the proposed building. The Bay Building may cast limited new shadows onto Upper Fort Mason during brief periods throughout the year (i.e., during the late afternoon hours during the winter months), but these new shadows would only reach the edge of the facility where there is open grassland and an existing walking path with ample access to sunlight.

The proposed new buildings would also shade portions of public streets and sidewalks in the project vicinity at various times of the day throughout the year. The shadows on streets and sidewalks would not exceed levels commonly expected in urban areas and would be considered a less-than-significant effect under CEQA. Additionally, these shadows would be transitory in nature, would not substantially affect the use of the sidewalks, and would not increase shadow above levels that are common and generally expected in a developed urban environment.

As discussed above, the proposed project would not create new shadows that substantially affect existing outdoor recreation facilities or other public areas. This impact would be less than significant, and no mitigation measures would be required.

Impact C-SH-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to shadow. ***(No impact)***

The geographic context for shadow impacts is the area in which the proposed project and cumulative projects, in combination, would shade the same public open spaces. The Marina Remediation Project is located approximately 830 feet from the project site. The Marina Remediation project is primarily an environmental clean-up project for the Marina harbor and contains very few built elements. Of the built elements that are planned, such as the new boat slips, the breakwaters, and park improvements, none are tall enough to cast a shadow that would combine with the shadow cast from the proposed project, Therefore, no cumulative shadow impact would occur, and no mitigation is required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.12. RECREATION. Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒	☐

Comments received in response to the NOP on potential impacts to recreational resources included concerns over reduced street parking for nearby public parks and how the use of recreational facilities will be affected from shadows stemming from the newly constructed buildings. Commenters are referred to the discussion below in addition to the discussion in Section E.12, Shadow and Section E.6, Transportation and Circulation with respect to the proposed project's changes to on-street parking.

Impact RE-1: The proposed project would not increase the use of existing neighborhood and regional parks and other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. ***(Less than Significant)***

The nearest park and recreation facilities to the project site are the Moscone Recreation Center, immediately across Laguna Street to the west; Fort Mason, immediately across Bay Street to the north; and the Marina Green, approximately 0.5 mile to the northwest, as further described below:

- The Moscone Recreation Center is an approximately 12-acre facility that includes a community center and gymnasium, a playground, dog park, picnic area, basketball courts, tennis courts and baseball and softball fields.

- Fort Mason is a 1,200 acre greenbelt on the City's northern waterfront that includes an open meadow, walking paths, and cultural sites associated with the former use as a military installation.

- The Marina Green is an approximately 74-acre open neighborhood field used for youth soccer and other activities.

During the 29-month construction period, it is unlikely that short term construction workers would permanently relocate to the area around the project site from more distant locations and therefore would not contribute to a new population of permanent recreational users. During construction, there may be temporary demand for these recreational resources because workers could use parks and recreational facilities when on break. However, any use by project construction workers would likely be intermittent and minimal.

The proposed project would add 23 residential care units to the project site, increasing the number of on-site residents by 33 (from 86 to 119). The project would also increase the usable open space on the site by 3,870 square feet, to a total of 30,280 square feet, via 3,550 square feet of occupiable space and 940 square feet of green area on the roof of the new Bay Building. It is anticipated that the new residents would visit the aforementioned local parks, but this increase in use would not have a significant effect on existing facilities due to the small number of new residents as well as ample park and recreation opportunities within the immediate vicinity. Additionally, intermittent use of parks throughout the day by future project employees would likely be limited to the lunch hour or other midday breaks, if at all. Therefore, the proposed project would have a less-than-significant impact recreational facilities and resources, and no mitigation measures would be required.

Impact RE-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. ***(No Impact)***

The proposed project would not include the construction or operation of any recreational facilities and therefore would not have the potential to result in an adverse physical environmental effect from construction or operation of recreational facilities. No mitigation measures would be required.

Impact C-RE-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to recreation. ***(No impact)***

There are no actively planned projects within the vicinity of the project site that would contribute to cumulative impacts to recreation. The Marina Improvements and Remediation Project would make some open space improvements in the vicinity of the site and would enhance recreational opportunities. Therefore, the proposed project would have no cumulative impacts on recreation, and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.13. UTILITIES AND SERVICE SYSTEMS. 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?	☐	☐	☒	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☒	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Impact UT-1: **The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, nor would it result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.** ***(Less than Significant)***

The project site is served by the City's combined sewer system, which collects and treats most of the wastewater and stormwater at one of the three San Francisco Public Utilities Commission (SFPUC) treatment facilities. Wastewater and stormwater generated by the project would be treated at the Southeast Water Pollution Control Plant to standards contained in the City's National Pollutant Discharge Elimination System Permit prior to discharge into the San Francisco Bay. The treatment and discharge standards are set and regulated by the Regional Water Quality Control Board. The Southeast Water Pollution Control Plant has the capacity to treat up to 85.4 million gallons per day (mgd) of dry weather wastewater flows and up to 250 mgd during storm weather. In 2020, the Southeast Water Pollution Control Plant treated an average dry weather flow of 56.2 mgd.

As described in Section E.2, Population and Housing, the proposed project would increase the residential population on the site to 119 residents (33 net new residents) and employment to 75 staff members (22 net new staff members). The proposed project would incorporate water-efficient fixtures, as required by title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions.

The SFPUC's 2020 Urban Water Management Plan (UWMP)[74] and Sewer System Management Plan[75] account for projected population and employment growth. The incorporation of water-efficient fixtures into new development is also accounted for by the SFPUC, because widespread adoption can lead to more efficient use of existing capacity. For these reasons, the population increase associated with the proposed project

[74] San Francisco Public Utilities Commission, *2020 Urban Water Management Plan for the City and County of San Francisco*, June 2021.

[75] San Francisco Public Utilities Commission, *San Francisco Sewer System Management Plan*, September 2021.

would not require the construction of new or expansion of existing wastewater treatment facilities. The project site has been developed since at least 1925 and consists of built and paved surfaces, as well as areas of landscaped open space. The two new buildings to be constructed on the site would be developed in the same locations as the two structures to be demolished and within areas of existing paved surfaces. The project site is developed with existing buildings and paved surfaces occupying 37,066 square feet of impervious surfaces. The proposed project would result in a minor increase of 3,480 square feet of impervious surface for a total of 40,546 square feet of impervious surfaces. Therefore, the proposed project would not significantly increase the amount of stormwater entering the combined sewer system. Furthermore, the proposed project would be required to comply with the City's Stormwater Management Ordinance and the Stormwater Management Requirements and Design Guidelines, which would ensure that the proposed project includes appropriate stormwater management systems that retain runoff on site, promote stormwater reuse, and limit discharges from the site from entering the City's combined stormwater sewer system. As such, the proposed project would not result in a significant increase in the total amount of storm water runoff or an increase in the concentration of pollutants in stormwater runoff that would result in the need for the construction of new or expanded stormwater drainage and treatment facilities. Impacts on stormwater infrastructure would be less than significant, and no mitigation measures would be required.

As discussed in more detail in Impact UT-2, the proposed project would result in an incremental increase in the demand for new water supplies but would not itself result in the need for the construction of new or expanded water treatment facilities or delivery infrastructure.

The proposed project could result in an incremental increase in the demand for electricity and telecommunications, but any increase would not exceed amounts expected and provided for in the project area by utility service providers. The proposed project would be subject to the energy conservation standards included in the San Francisco Green Building Ordinance, which contains energy efficiency and water conservation requirements, such as installing water conserving fixtures to reduce potable water demand. In addition, the proposed project would be required to comply with title 24 of the California Code of Regulations, which regulates energy consumption associated with heating, cooling, and ventilation, and lighting; it is enforced by the building department. Compliance with title 24 and the San Francisco Green Building Ordinance would ensure electricity and telecommunications would be provided to meet the needs of the project.

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, and no mitigation would be required.

Impact UT-2: The proposed project would not significantly increase water demand and would not require expansion or construction of new water supply or treatment facilities. ***(Less than Significant)***

The SFPUC adopted the 2020 Urban Water Management Plan (2020 plan) in June 2021.[76] The 2020 plan estimates that current and projected water supplies will be sufficient to meet future demand for retail

[76] San Francisco Public Utilities Commission, 2020 Urban Water Management Plan for the City and County of San Francisco, adopted June 11, 2021. This document is available at https://sfpuc.org/about-us/policies-plans/urban-water-management-plan.

water[77] customers through 2045 under wet- and normal-year conditions. In dry years, however, the SFPUC would implement water use and supply reductions through its Water Shortage Contingency Plan and a corresponding Retail Water Shortage Allocation Plan.[78]

The 2020 plan relied on the San Francisco Planning Department (planning department) housing projections based on the Housing Element 2022 Update, which was still under development when the 2020 plan was adopted. The City adopted the Housing Element 2022 Update in January 2023 with slightly different housing projections. The next update for the Urban Water Management Plan will be in 2025. Accordingly, the SFPUC prepared the 2023 Interim Water Demand Projections (2023 Interim Projections) to document the SFPUC's projected retail water supplies when compared to projected retail water demands associated with the adopted Housing Element 2022 Update.[79] In normal hydrologic years and single dry year conditions, there would be no retail supply shortfall. This is unchanged from the 2020 plan. In the multiple dry year scenario, the SFPUC would only experience system-wide shortages in retail water supplies of 10 percent during years 4 and 5 of an extended drought at 2045 levels of demand. In a 10% shortage, retail customers would reduce their demands by 5 percent as required by the Water Supply Agreement between SFPUC and its Wholesale Customers. As a result of this demand reduction, there is a projected surplus of 5.3 percent, or 4.1 mgd, which is 0.1 mgd greater than that estimated in the 2020 UWMP. The information below accounts for the 2020 plan and 2023 interim projections.

In December 2018, the State Water Resources Control Board adopted amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives for the Bay-Delta watershed, and in particular the Stanislaus, Tuolumne, and Merced tributaries (the Bay-Delta Plan Amendment).[80] The state water board has previously indicated its intent to implement the Bay-Delta Plan Amendment by 2022, assuming all required approvals are obtained by that time. However, at this time, implementation of the Bay-Delta Plan Amendment remains uncertain due to pending legal challenges and outstanding regulatory actions. Implementation of the Bay-Delta Plan Amendment would result in a substantial reduction in the SFPUC's water supplies from the Tuolumne River watershed during dry years, requiring rationing to a greater degree in San Francisco than previously anticipated to address supply shortages.

The SFPUC continues to negotiate with the State and other stakeholders to amend the Bay-Delta Plan Amendment to incorporate a Healthy Rivers and Landscapes agreement as its implementation pathway. To this end, in November 2022, the SFPUC signed a memorandum of understanding with the state and other water users to structure their participation in the Healthy Rivers and Landscapes agreement negotiation process. This framework document is designed to facilitate the parties' development of enforceable agreements with actions and funding to integrate additional water flows with the physical landscape to help improve habitat for native fish in the Sacramento-San Joaquin River Delta watershed, including on the

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77 "Retail" demand represents water the SFPUC provides to individual customers within San Francisco. "Wholesale" demand represents water the SFPUC provides to other water agencies supplying other jurisdictions.

78 San Francisco Public Utilities Commission, 2020 Urban Water Management Plan for the City and County of San Francisco, Appendix K – Water Shortage Contingency Plan, adopted June 11, 2021. This document is available at https://sfpuc.org/about-us/policies-plans/urban-water-management-plan.

79 San Francisco Public Utilities Commission, 2023 Interim Water Demand Projections for the City and County of San Francisco, September 2023. Available at: https://www.sfpuc.gov/sites/default/files/documents/2023_Interim_Water_Demand_Projections_Sep2023_0.pdf, accessed July 26, 2024.

80 State Water Resources Control Board Resolution No. 2018-0059, Adoption of Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document, December 12, 2018, available at https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf.

Tuolumne River. In March 2024, in furtherance of the memorandum of understanding, the SFPUC submitted the key components of its proposed Healthy Rivers and Landscapes agreement to the state water board.

Whether, when, and the form in which the Bay-Delta Plan Amendment will be implemented, and how those amendments will affect the SFPUC's water supply, is currently unknown. As a result, implementation of the Bay-Delta Plan Amendment is uncertain. Due to these uncertainties, the 2020 plan in conjunction with the 2023 interim projections presents future supply scenarios both with and without the Bay-Delta Plan Amendment, as follows:

1. Without implementation of the Bay-Delta Plan Amendment wherein the water supply and demand assumptions contained in Section 8.4 of the 2020 plan and updated in Table 5 of the interim projections would be applicable

2. With implementation of a Healthy Rivers and Landscapes agreement between the SFPUC and the state water board that would include a combination of flow and non-flow measures that are designed to benefit fisheries at a lower water cost, particularly during multiple dry years, than would occur under the Bay-Delta Plan Amendment

3. With implementation of the Bay-Delta Plan Amendment as adopted wherein the water supply and demand assumptions contained in Section 8.3 of the 2020 plan and updated in Table 4 of the interim projections would be applicable

Water supply shortfalls during dry years would be lowest without implementation and highest with implementation of the Bay-Delta Plan Amendment. Shortfalls under the proposed Healthy Rivers and Landscapes agreement would be between those with and without implementation of the Bay-Delta Plan Amendment.[81]

Under these three scenarios, the SFPUC would have adequate water to meet demand in San Francisco through 2045 in wet and normal years.[82] Without implementation of the Bay-Delta Plan Amendment, water supplies would be available to meet demand in all years except for a 4.1 million gallons per day (5.3 percent) shortfall in years four and five of a multiple-year drought based on 2045 demand.

With implementation of the Bay-Delta Plan Amendment, shortfalls would range from 11.8 million gallons per day (16.5 percent) in a single dry year to 19.8 million gallons per day mgd (27.8 percent) in years two through

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81 On March 26, 2019, the SFPUC adopted Resolution No. 19-0057 to support its participation in the Healthy Rivers and Landscapes agreement negotiation process. On March 1, 2019, the SFPUC, in partnership with other key interested parties, submitted a proposed project description that could form the basis for a Healthy Rivers and Landscapes agreement to the state water board. In November 2022, the SFPUC and partner water agencies on the Tuolumne River signed onto a memorandum of understanding between the state and other parties to structure their participation in the Healthy Rivers and Landscapes agreement negotiation process. This framework document is designed to facilitate the parties' development of enforceable agreements and amendments to the Bay-Delta Plan, with actions and funding to integrate additional water flows with the physical landscape to help improve habitat for native fish in the Sacramento-San Joaquin River Delta watershed, including on the Tuolumne River. On March 29, 2024, in furtherance of the memorandum of understanding, the SFPUC submitted the key components of its proposed Health Rivers and Landscapes agreement to the state water board. The SFPUC continues to actively participate in this process. Because the state water board has yet to accept proposed Healthy Rivers and Landscapes agreement, the shortages that would occur with its implementation are not known with certainty. However, if accepted, the Healthy Rivers and Landscapes agreement would result in dry year shortfalls of a lesser magnitude than under the Bay-Delta Plan Amendment.

82 Based on historic records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully implemented infrastructure under the 2018 Phased Water System Improvement Program Variant, normal or wet years occurred 85 out of 97 years. This translates into roughly nine normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly one out of every 10 years. This frequency is expected to increase as climate change intensifies.

five of a multiple-year drought based on 2025 demand levels, and from 21 million gallons per day (25.9 percent) in a single dry year to 29 million gallons per day (35.8 percent) in years four and five of a multiple-year drought based on 2045 demand.

The proposed project does not require a water supply assessment under the California Water Code. Under sections 10910 through 10915 of the California Water Code, urban water suppliers like the SFPUC must prepare water supply assessments for certain large "water demand" projects, as defined in CEQA Guidelines section 15155.[83] The proposed project would result in a 58,380-square-foot expansion of an existing institutional use including an increase in residential care units by 23 from 86 to 109. At project completion, a total of 119 residents would be located on the site with a staff of 75. As such, it does not qualify as a "water-demand" project as defined by CEQA Guidelines section 15155(a)(1), and a water supply assessment is not required and has not been prepared for the project. The following discussion considers the potential water supply impacts for projects such as the proposed project that do not qualify as "water demand" projects.

No single development project alone in San Francisco would require the development of new or expanded water supply facilities or require the SFPUC to take other actions, such as imposing a higher level of rationing across the City in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. The following analysis instead considers whether the proposed project, in combination with both existing development and projected growth through 2045, would require new or expanded water supply facilities, the construction or relocation of which could have significant construction impacts on the environment that are likely mitigable. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. It is only under this cumulative context that development in San Francisco could have the potential to require new or expanded water supply facilities or require the SFPUC to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis considers whether the project would make a considerable contribution to the cumulative impact.

Based on guidance from the California Department of Water Resources and a citywide demand analysis, the SFPUC has established 50,000 gallons per day as the maximum water demand for projects that do not meet the definitions provided in CEQA Guidelines section 15155(a)(1).[84] The development proposed by the project would represent approximately 4.6 percent of the 500 units of residential use provided in section 15155(1)(A). The proposed project would also incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the City's Green Building Ordinance. In addition, under existing conditions the project site's water demand is below 10,000 gallons per day[85]; the proposed project would add 27 percent more units (an increase of 23 residential care suites from 86 to 109 residential care suites),

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[83] Pursuant to CEQA Guidelines section 15155(1), "a water-demand project" means:
(A) A residential development of more than 500 dwelling units.
(B) A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
(C) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area.
(D) A hotel or motel, or both, having more than 500 rooms, (e) an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
(F) A mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.
(G) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

[84] Memorandum, from Steven R. Ritchie, Assistant General Manager, Water Enterprise, San Francisco Public Utilities Commission to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department – Environmental Planning, May 31, 2019.

[85] The water bill provided by the project sponsor shows a 29 day period between 11/22/23 to 12/20/23 in which the average water consumption was approximately 6,,0000 gallons of water per day (144,787 gallons/29 days). F. Rockwood, personal communication, February 28, 2024.

but would also increase water efficiency compared to the project site's existing features. It is therefore reasonable to assume that the proposed project would result in an average daily demand of substantially less than 50,000 gallons per day of water.

Accordingly, the project's water demand would represent a small fraction of the total projected demand. As such, the project's water demand would not require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects.

Sufficient water supplies are available to serve the proposed project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented. As indicated above, the proposed project's maximum demand would represent less than 0.06 percent of the total demand in 2045 when the retail supply shortfall projected to occur with implementation of the Bay-Delta Plan Amendment would be up to 35.8 percent in a multiple-year drought. The SFPUC has indicated it is accelerating its efforts to develop additional water supplies and explore other projects that would improve overall water supply resilience through an alternative water supply program. The SFPUC has taken action to fund the study of additional water supply projects, but it has not determined the feasibility of the possible projects and has determined that the identified potential projects would take anywhere from 10 to 30 years or more to implement. The potential impacts that could result from the construction and/or operation of any such water supply facility projects cannot be identified at this time. In any event, under such a worst-case scenario, the demand for the SFPUC to develop new or expanded dry-year water supplies would exist regardless of whether the proposed project is constructed.

Given the long lead times associated with developing additional water supplies, in the event the Bay-Delta Plan Amendment were to take effect sometime after project approval and result in a dry-year shortfall, the expected action of the SFPUC for the next 10 to 30 years (or more) would be limited to requiring increased rationing. As discussed in the SFPUC memorandum, the SFPUC has established a process through its Retail Water Shortage Allocation Plan for actions it would take under circumstances requiring rationing. The level of rationing that would be required of the proposed project is unknown at this time. Both direct and indirect environmental impacts could result from high levels of rationing. However, the small increase in potable water demand attributable to the project compared to citywide demand would not substantially affect the levels of dry-year rationing that would otherwise be required throughout the City. Therefore, the proposed project would not make a considerable contribution to a cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment. Project impacts related to water supply would be less than significant and no mitigation would be required.

Impact UT-3: The proposed project would not generate solid waste in excess of state or local standards, would not impair the attainment of solid waste reduction goals, and would comply with statutes, regulations, and reduction goals concerning solid waste. ***(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, through September 2024 or until 3.4 million tons have been disposed of, whichever occurs first. The City would have an option to renew the agreement for a period of six years or until an additional 1.6 million tons have been

disposed of, whichever occurs first.[86] The Recology Hay Road Landfill is permitted to accept up to 2,400 tons per day of solid waste. At that maximum permitted rate, the landfill has the capacity to accommodate solid waste until approximately 2034. Under existing conditions, the landfill receives an average of approximately 1,850 tons per day from all sources, with approximately 1,200 tons per day from San Francisco, which includes residential and commercial waste and demolition and construction debris that cannot be reused or recycled[87] (see discussion below). At the current rate of disposal, the landfill has operating capacity until 2041. The City's contract with the Recology Hay Road Landfill will extend until 2031 or when the City has disposed of 5 million tons of solid waste, whichever occurs first. At that point, the City would either further extend the landfill contract or find and entitle an alternative landfill site.

San Francisco set a goal of 75 percent solid waste diversion by 2010, which it exceeded at 80 percent diversion.[88] The current goal, set in 2018, is to reduce total waste generation by 15 percent and disposal to landfill by 50 percent before 2030.[89] San Francisco Ordinance No. 27-06 requires mixed construction and demolition debris to be transported by a Registered Transporter and taken to a Registered Facility that must recover for reuse or recycling and divert from landfill at least 65 percent of all received construction and demolition debris. San Francisco's Mandatory Recycling and Composting Ordinance No. 100-09 requires all properties and persons in the City to separate their recyclables, compostables, and landfill trash.

The proposed project would incrementally increase total City waste generation; however, the proposed project would be required to comply with San Francisco Ordinance Nos. 27-06 and 100-09. Due to the existing and anticipated increase of solid waste recycling in the City and the agreement with Recology for disposal of solid waste at the Hay Road Landfill, any increase in solid waste resulting from the proposed project would be accommodated by the existing landfill. Thus, the proposed project would have less-than-significant impacts related to solid waste, and no mitigation would be 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)***

As described above, existing service management plans for water, wastewater, and solid waste disposal account for anticipated citywide growth. Furthermore, all projects in San Francisco would be required to comply with the same regulations described above that reduce stormwater, potable water, and waste generation. Therefore, the proposed project, in combination with other cumulative development projects, would not result in a significant cumulative utilities and service systems impact, and no mitigation would be required.

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86 San Francisco Planning Department, Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County, Final Negative Declaration, Planning Department Case No. 2014.0653, May 21, 2015, http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf, Accessed: April 12, 2024.

87 CalRecycle, 2010, Jurisdiction diversion/disposal rate detail. http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionDetail.aspx?JurisdictionID=438&Year=2010, Accessed: April 12, 2024.

88 San Francisco Department of the Environment, San Francisco Ordinance No. 27-06, July 1, 2006, https://sfenvironment.org/sites/default/files/fliers/files/cd_ordinance.pdf, Accessed: April 12, 2024.

89 San Francisco Department of the Environment, Zero Waste – Frequently Asked Questions, https://sfenvironment.org/zero-waste-faqs, Accessed: April 12, 2024.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.14. PUBLIC SERVICES. 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?	☐	☐	☒	☐	☐

The project's impacts to parks are discussed in Section E.12, Recreation. The proposed project is an expansion of an existing residential care facility and new residents would not generate new students; therefore, impacts to school services are not applicable and this topic is not further discussed. Impacts to other public services are discussed below. As discussed in Section E.3, Population and Housing, the proposed project would add a total of up to 33 residents compared to existing conditions. At project completion, a total of 75 staff members are expected to be employed at the site compared to 53 staff members under existing conditions. These increases would incrementally increase the demand for public services, as further discussed below.

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)***

Fire Protection

The San Francisco Fire Department (fire department) provides fire protection and emergency medical services in San Francisco, including the project site. The fire department consists of 45 active fire stations within San Francisco's 49 square miles. The fire department provides fire suppression and unified emergency medical services, including basic life support and advanced life support services. The closest fire station is Station 16 at 2251 Greenwich Street, approximately 0.6 mile southwest of the project site.

Construction activities would occur over 29 months. Construction staffing levels would vary throughout the construction duration in accordance with seasons and on-site construction activities. Construction activities have the potential to result in accidental on-site fires from such sources as mechanical equipment and the use of flammable construction materials. However, the proposed project would comply with Occupational Safety and Health Administration and fire and building code requirements; and construction managers and

personnel would be trained in emergency response and fire safety operations, which include the monitoring and management of life safety systems and facilities. Additionally, fire suppression equipment (e.g., fire extinguishers) would be maintained on site throughout the construction duration. Furthermore, construction would comply with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste (refer to Section E.18, Hazards and Hazardous Materials). Therefore, the likelihood of accidents involving construction personnel and equipment and the need for fire department aid would be reduced and would not increase the demand for fire suppression or emergency response during the temporary construction period; new or altered fire stations would not be necessary to maintain response times.

The proposed project would incrementally increase the demand for fire protection and emergency medical services, due to the increase in the number of residents living on the project site. There would be a net increase of approximately 33 residents and 22 staff members within the existing residential care facility; however, the increase in demand would not be substantial given the overall demand for such services on a citywide basis. Moreover, fire protection and emergency medical resources are regularly redeployed based on need in order to maintain acceptable service ratios. For these reasons, implementation of the proposed project would not require the construction of new or alteration of existing fire facilities. Furthermore, the proposed project would be required to comply with applicable building and fire code requirements, including the California Fire Code, which establishes requirements for fire protection systems, such as providing state-mandated fire alarms, fire extinguishers, appropriate building access and egress, and emergency response notification systems. The project sponsor would also comply with the requirements pertaining to the water volume and pressure needed for fire suppression on site. Compliance with all applicable building and fire codes would further reduce the demand for fire department service and oversight.

For these reasons, the impact of the proposed project on fire protection services that could result in physical environmental impacts would be less than significant, and no mitigation measures would be required.

Police Protection

The San Francisco Police Department (police department) provides police protection services to the project site. There are 10 district stations; the project site is in the Northern Station jurisdiction located at 1125 Fillmore Street.

The proposed project could result in an incremental increase in demand for police protection services. Construction sites can attract theft and vandalism if not properly secured. Security measures such as security fencing, lighting, and locked entry could be used to prevent theft and vandalism. Although the proposed project could increase the number of calls received from the area, the increase in responsibilities would not be substantial in light of the existing demand for police protection services. Construction of the proposed project would be temporary, for a 29-month construction period, and would not require new or physically altered police facilities that could cause significant environmental impacts. Hence, the proposed project would have a less-than-significant impact related to the provision of police services, and no mitigation measures would be required.

Project operation would result in an incremental increase in police services due to an increase of residents living on the project site. The project site would be occupied by an additional 33 residents and 22 staff members compared to existing conditions. Typical police protection services such as responses to reported

crimes, traffic enforcement, and trespassing/vandalism prevention would be required. Although the site would be used more intensively, which typically is associated with a greater number of calls for service, the increase in residents is minimal, security is provided on site for residential care facility residents, and the Northern District would be able to provide the necessary police services and crime prevention in the area. Operation of the proposed project would not require the construction of new or physically altered police facilities that could result in a physical environmental impact in order to maintain acceptable service ratios, response times, or other performance objectives for police services. Therefore, the proposed project would have a less-than-significant impact related to the provision of police services, and no mitigation measures would be required.

Other Government Services

The proposed project would result in the net addition of 23 residential care suites on the project site and therefore is not expected to result in a significant change in demand for government services, including libraries, post offices, and other public facilities. Residents living on the project site would likely patronize the two branches of the San Francisco Public Library within proximity to the project site. The Golden Gate Valley Branch (located at 1801 Green Street) lies 0.5 mile to the south of the project site and the Marina Branch (located at 1890 Chestnut Street) lies 0.3 mile to the southwest of the project site. While the project would increase the population on the project site, the number of library branches in such a close proximity would ensure that effects on these facilities would be minimal and would not require new or altered facilities, the construction of which would result in physical environmental impacts. Therefore, the proposed project would have a less-than-significant impact on other government services, and no mitigation measures would be 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 geographic context for cumulative fire, police, and library impacts are the police, fire, and library service areas. The Marina Harbor and Remediation project may increase the use of the Marina Green and Triangle Park through improvements to recreational infrastructure elements like new picnic areas, shoreline trails, and volleyball courts. In addition, essential City service providers continually assess demand, based on anticipated growth and service needs. By analyzing the applicable metrics, these agencies and services can adjust staffing, capacity, response times, and other measures of performance. As a result, there would not be any service gap in fire, police, library, or other governmental services associated with the proposed project and cumulative development. Therefore, the proposed project, in combination with cumulative projects, would have less-than-significant cumulative public services impacts, and no mitigation measures are required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.15. BIOLOGICAL RESOURCES. Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐		☒	☐	☐	☐
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?	☐		☐	☐	☐	☒
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?	☐		☐	☐	☐	☒
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?	☐		☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐		☐	☒	☐	☐
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?	☐		☐	☐	☐	☒

The project site is currently developed with the approximately 83,300-square-foot Heritage on the Marina residential care facility and is primarily covered by impervious surfaces. The project site does not contain

federally protected wetlands as defined by section 404 of the Clean Water Act, riparian habitat, or other sensitive natural communities. In addition, the project site is not located within an adopted habitat conservation plan, a natural community conservation plan, or other approved local, regional, or state habitat conservation plan areas. Therefore, Topics E.15(b), E.15(c), and E.15(f) are not applicable to the proposed project and are not further discussed in this section.

Comments received in response to the NOP included concerns over the removal of mature trees that act as a habitat for natural communities. Additional comments expressed by the California Department of Fish and Wildlife (CDFW) expressed concerns related to the potential impact of the project on candidate or special status species like peregrine falcons, monarch butterflies, and bumble bees.

In order to assess the potential for special status species to occur on the project site, the CDFW California Natural Diversity Database (CNDDB)[90] was queried for occurrences of special-status species within a 5-mile radius around the project site. The results are provided in **Table E.15.1, Special-Status Species Evaluated for the Project** and discussed further below.

Table E.15-1 Special-Status Species Evaluated for the Project

Species	Status[1] (F/S/CDFW)	General Habitat Discussion	Potential to Occur Within the Project Site
Amphibian			
California giant salamander ***Dicamptodon ensatus***	(--/--/SSC)	Inhabit wet coastal forests near streams and seeps from Mendocino County south to Monterey County and east to Napa County.	**None.** There are no wet coastal forests on or near the site. The closest CNDDB occurrence (#79) is 4.26 miles away from the project site, southwest of the City of Sausalito. Multiple adults were caught in 1944-1945 in mammal traps.
California red-legged frog ***Rana draytonii***	(Threatened/--/SSC)	Occurs in a variety of ponds, sloughs, low-gradient streams, and low-salinity lagoons. Adults may forage in, and migrate through, terrestrial grasslands, riparian woodlands, and forests, but require weedy, slow moving or standing water that persist through most of the dry season for successful reproduction.	**None.** There is no suitable breeding or upland habitat present in or near the site. The closest CNDDB occurrence (#2) is 2.34 miles away from the project site at Mountain Lake in the Presidio of San Francisco. No exact date was given for this occurrence, but it is estimated to be around 1966.

[90] California Department of Fish and Wildlife. 2024 California Natural Diversity Database, commercial version dated June 2024, Biogeographic Data Branch, Sacramento.

Table E.15-1 Special-Status Species Evaluated for the Project

Species	Status[1] (F/S/CDFW)	General Habitat Discussion	Potential to Occur Within the Project Site
Birds			
American peregrine falcon ***Falco peregrinus anatum***	(Delisted/delisted/--)	Nesting sites are typically on ledges of large cliff faces. Many pairs are nesting on City buildings and bridges or in tree cavities of tall trees like coastal redwoods.	**None.** This species nests on taller structures than those on the project site, such as radio towers and buildings in the Financial District. The closest CNDDB occurrence (#51) was a sighting that overlapped with the project site. The occurrence was documented in 2014 within an 80-meter diameter around an urban structure that the falcon was nesting in.
Saltmarsh common yellowthroat ***Geothlypis trichas sinuosa***	(--/--/SSC)	Inhabits fresh and salt water marshes of the San Francisco By Region. Requires thick, continuous cover down to water surface for foraging; tall grasses, tule patches, and willows for nesting.	**None.** No marshes are present on the site. The closest CNDDB occurrence (#53) is 4.78 miles away in the Rodeo Lagoon of Fort Barry Military Reservation. Five breeding pairs were observed in 1985 in the willows along the creek.
California black rail ***Laterallus jamaicensis coturniculus***	(--/Threatened/FP)	Inhabits freshwater marshes, wet meadows and shallow margins of saltwater marshes border larger bays. Needs water depths of about 1 inch that do not fluctuate during the year and dense vegetation for nesting habitats.	**None.** No marshes are present within the site. The closest CNDDB occurrence (#274) is 0.51 mile away from the site in the vicinity of Crissy Field Marsh, though since this occurrence is from 1887, the species may have been extirpated. The second closest CNDDB occurrence (#320) is 2.07 miles away from the project site along Highway 1 in the Presidio where one female was collected in 1942.
San Pablo song sparrow ***Melospiza melodia samuelis***	(--/--/SSC)	Residents of salt marshes along the north side of San Francisco and San Pablo bays. Inhabits tidal sloughs	**None.** No marshes are present on the site. The closest CNDDB occurrence (#41) is 4.48 miles away from

Table E.15-1 Special-Status Species Evaluated for the Project

Species	Status[1] (F/S/CDFW)	General Habitat Discussion	Potential to Occur Within the Project Site
		in the Salicornia marshes; nests in Grindelia bordering slough channels.	the project site at Belvedere where one was collected in 1923.
Double-crested cormorant ***Nannopterum auritum***	(--/--/WL)	Nests in undisturbed sites beside water, on islands or the mainland. Uses wide rock ledges on cliffs, rugged slopes, and tall trees.	**None.** The site is in a disturbed urban area unsuitable for nesting. The closest CNDDB occurrence (#26) is 2.61 miles away from the site on the old Bay Bridge where there was a large nesting colony documented in 1988.
Bank swallow ***Riparia riparia***	(--/Threatened/--)	Colonial nester; nests primarily in riparian and other lowland habitats west of the desert. Requires vertical banks/cliffs with fine-textured/sandy soils near streams, rivers, lakes, and oceans to dig nesting holes.	**None.** No vertical banks are present within or in the vicinity of the site. The closest CNDDB occurrence (#115) is 4.7 miles west of the site on Ocean Beach where a colony of 100 pairs was first reported in 1927 and again in 1960.
		Insects	
Obscure bumble bee ***Bombus caliginosus***	(--/--/--) IUCN_VU	Open grassy coastal prairies and Coast Range meadows. Nesting occurs underground and sometimes above ground in abandon bird nests. Underground nest sites include abandoned rodent nests, in tufts of grass, rock piles, or cavities in dead trees. Food plants include *Ceanothus, Cirsium, Clarkia, Keckiella, Lathyrus, Lotus, Lupinus, Rhododendron, Rubus, Trifolium,* and *Vaccinium*.	**None.** As a generalist forager, this species potentially occurs wherever flowering plants bloom within its range, however, compacted soils are not suitable for nesting. This species has been noted to not do well in urban habitats and is often out competed by the yellow-faced bumblebee (*Bombus vosnesenskii)*. The closest CNDDB occurrence (#178) is 1.2 miles away from the site in Thompson Reach, a habitat restoration area within the Presidio. This occurrence was mapped by CNDDB according to a Presidio Trust map that

Table E.15-1 Special-Status Species Evaluated for the Project

Species	Status[1] (F/S/CDFW)	General Habitat Discussion	Potential to Occur Within the Project Site
			accompanied 3 bees that were collected in 2008 or 2009. Due to the lack of pristine habitat near the project site, it is unlikely to occur.
Western bumble bee ***Bombus occidentalis***	(--/Candidate Endangered/--)	Meadows and grasslands with abundant floral resources. Nests are primarily in underground cavities such as squirrel burrows, located on open west-southwest slopes bordered by trees. Food plant genera include but are not limited to *Cirsium, Eriogonum, Solidago, Aster, Ceanothus, Centaurea,* and *Penstemon*.	**None.** As a generalist forager, this species potentially occurs wherever flowering plants bloom within its range, however, the project site lacks its preferred foraging and nesting habitats. The closest CNDDB occurrence (#241) is 0.93 mile from the site, mapped in the general vicinity of the Presidio. The exact location is unknown as the collections occurred between 1916 and 1954. The most recent CNDDB occurrence (#240) of the Western bumble bee within 5 miles of the site was in 1998, which was mapped by CNDDB non-specifically across the San Francisco Botanical Garden in Golden Gate Park, where there are many plants that bumble bees could use for foraging.
Monarch butterfly – California overwintering population ***Danaus plexippus plexippus* pop. 1**	(Candidate/--/--)	Winter roost sites extend along the coast from northern Mendocino to Baja California, Mexico. Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	**None.** While individual monarchs may fly near or over the site during migration, there are no suitable tree groves for overwintering in the site. The closest CNDDB occurrence (#239) is 0.19 mile away from the site in Fort Mason (Xerces Site #3039). The roost trees were located behind the Fort Mason headquarters building

Table E.15-1 Special-Status Species Evaluated for the Project

Species	Status[1] (F/S/CDFW)	General Habitat Discussion	Potential to Occur Within the Project Site
			and they were last observed there in 2014, but have been documented in the area on and off since 1990.
Mission blue butterfly ***Icaricia icarioides missionensis***	(Endangered/--/--)	Bay Area grasslands with lupine host plants including silver lupine (*Lupinus albifrons*) and summer lupine (*Lupinus formosus*). Specifically found in San Bruno Mountains, Skyline Ridges, Twin Peaks, and Marin Headlands.	**None.** The site is not within this species' known range. The closest CNDDB occurrence (#8) is 2.69 miles from the project site at Fort Baker, just north of the Golden Gate Bridge. The butterfly was recorded in 1981 at its northern limit of distribution, but was not found when checked again in 1984 and 1985.
	Mammals		
Townsend's big-eared bat ***Corynorhinus townsendii***	(--/--/SSC)	Roosts in man-made structures such as caves, mines, tunnels, old buildings and bridge crevices. Typically found in quiet, undisturbed places.	**None.** The urban area that the site is located in is not suitable for this species. The closest CNDDB occurrence (#310) is 2.57 miles away from the project site at Twin Peaks in San Francisco where one female was collected in 2005.
Western red bat ***Lasiurus frantzii***	(--/--/SSC)	Roosts almost exclusively in trees near forests and riparian habitat. Roost in sycamore, cottonwood, ash, elder, and mulberry trees.	**None.** There are no forests and riparian habitats in the vicinity of the site. The closest CNDDB occurrence (#90) is 3.01 miles away in Golden Gate Park where one bat was observed in 2000 on a cultivated African hemp (*Sparrmannia africana*).
American badger ***Taxidea taxus***	(--/--/SSC)	Most abundant in drier open stages of most shrub, forest, and herbaceous habitats, with friable soils.	**None.** No suitable habitat present on the site. The closest CNDDB occurrence (#124) is 2.05 miles away in Golden Gate Park where one male was collected in 1936.

Table E.15-1 Special-Status Species Evaluated for the Project

Species	Status[1] (F/S/CDFW)	General Habitat Discussion	Potential to Occur Within the Project Site
Reptiles			
Western pond turtle ***Emys marmorata***	(Proposed Threatened/--/SSC)	Ponds, marshes, rivers, streams, and irrigation ditches that have emergent or riparian vegetation and sunny basking sites. Upland nesting habitat consists of friable soil exposed to full sun.	**None.** No bodies of water on the site or in the surrounding area. The closest CNDDB occurrence (#1262) is 2.22 miles away at Mountain Lake in the Presidio where individuals were translocated to the lake in 2015. Hatchlings and adults were found in the most recent surveys in 2021.
San Francisco garter snake ***Thamnophis sirtalis tetrataenia***	(Endangered/ Endangered/FP)	Found in small reedy marsh-edges and ponds. Moves into uplands in the late summer, spends winter in small mammal burrows.	**None.** No marsh edges or ponds in or near the site. The closest CNDDB occurrence (#9) is 3.62 miles away, though it is an occurrence covering a large, nonspecific area that stretches from southern San Francisco to past Montara Mountain. The occurrence appears to have been first observed in 1987 and was last updated in 2014.

Source: Compiled by LSA (2024).

[1] F = Federal; S = State; CDFW = California Department of Fish and Wildlife

Status Key:

Federal Status: FT = Federally listed as threatened; FE = Federally listed as endangered; FC = Federal Candidate Species

State Status: CE = California State listed as endangered; CT = California State listed as threatened; SSC = California species of special concern; FP = California Fully Protected

CDFW Status: FP = Fully Protected; SSC= Species of Special Concern; WL=Watch List

IUCN (International Union for Conservation of Nature) Status: CR=Critical; EN=Endangered; VU=Vulnerable

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Impact BI-1: The proposed project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. ***(Less than Significant with Mitigation)***

The project site is located within the Pacific Flyway, a north/south-oriented path stretching from Alaska to Patagonia, along which many species of birds migrate as they travel between breeding and overwintering locations. Additionally, the project site is located within 300 feet of an urban bird refuge and as such is

subject to Section 139, Standards for Bird Safe Buildings, of the planning code, which establishes building design standards to reduce avian mortality rates associated with bird strikes.[91, 92]

Structures in an urban setting may present risks for birds as they traverse their migratory paths due to building locations and/or features. The City has adopted guidelines to address this issue and provided regulations for bird-safe design within the City.[93] The regulations establish bird-safe standards for new building construction, additions to existing buildings, and replacement facades to reduce bird mortality from circumstances known to pose a high risk to birds and are considered to be "bird hazards." The two circumstances regulated are: (1) location-related hazards where the siting of a structure inside or within 300 feet of an urban bird refuge (open spaces that are 2 acres and larger and dominated by vegetation or open water) creates an increased risk to birds, and (2) feature-related hazards, which may increase risks to birds regardless of where the structure is located. The standards for location-related hazards would apply and project features would use bird friendly glass to minimize bird strikes.

The proposed project is governed by location-related hazards (as defined in Section 139) due to its adjacency to the open spaces areas of Fort Mason to the north (Bay Street façade) and Moscone Recreation Center on the west (Laguna Street façade). The existing Julia Morgan Building façades facing Bay and Laguna streets are compliant due to existing window dimensions and historic building provisions in planning code section 139. New construction along Bay Street would comply with bird safe requirements either by conforming window glass sizes to section 139 allowances or utilization of bird-friendly glazing (with either etched or infrared markings). The all-glass "hyphen" connector between the Julia Morgan building and the proposed Bay Street building meets the definition of a feature-related hazard and, therefore, would be required to use bird-friendly glass. With these provisions the project would comply, as necessary, with the building feature-related hazard standards of planning code section 139.[94]

As stated previously, a list of special status terrestrial wildlife species with CNDDB occurrences within 5 miles of the project site was compiled (Table E.15.1). However, each of these species was determined to be absent from the project site because it lacks suitable habitat and/or is outside the known range of the species. Based on comments from CDFW received in response to the NOP that expressed concerns over the potential impacts of the project to American peregrine falcons, Monarch butterflies, and bumble bees, these species are analyzed in further detail below.

American Peregrine Falcons

The American peregrine falcon (*Falco peregrinus anatum*) has a range that includes most of California during migrations and in winter. They occupy a wide range of habitats and nest in locations with tall cliffs, buildings, bridges, and sometimes trees. They lay eggs in a "scrape" or shallow indentations high up but will occasionally use old nests of other birds. Typically, their breeding season starts around February or March and extends until May or June. There are two CNDDB occurrences within 5 miles of the project site, one that overlaps with the project site (Occurrence 51) and another that is 3.62 miles away (Occurrence 55). Both occurrences have few ecological descriptors and no location details, each of which are polygons that extend for 8 miles on each side. While these occurrences are vague and difficult to draw conclusions from, it is

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91 An urban bird refuge is defined by San Francisco Planning Code Section 139(c)(1) as an open spaces two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water.

92 San Francisco Planning Department, Urban Bird Refuge Map, https://sfplanning.org/resource/urban-bird-refuge, accessed May 8, 2024.

93 San Francisco Planning Department, Standards for Bird Safe Buildings, 2011, https://sfplanning.org/standards-bird-safe-buildings, accessed December 21, 2021.

94 Feature-related hazards are defined as the uninterrupted glazed segments of a building that measure 24 square feet or larger.

known that American peregrine falcons nest in tall, urban structures like radio towers, hangers, and buildings in San Francisco's Financial District. The buildings on the project site are not sufficiently tall to be used as nesting habitat by peregrine falcons, and therefore, there is no potential for this species to nest on the project site.

Monarch Butterflies

Monarch butterfly (*Danaus plexippus plexippus*) overwinter along the coast from northern Mendocino to Baja California, Mexico. Overwintering sites require specific microclimate characteristics that protect them from the elements and freezing temperatures. In California, they are often found roosting in wind-protected tree groves of eucalyptus, Monterey pines, and Monterey cypress trees that are near nectar and water sources. There are 10 presumed extant CNDDB occurrences of Monarch roosting sites within 5 miles of the project site, though most of them are more than 3 miles away. The closest CNDDB occurrence (Occurrence number 239) is 0.19 mile away at Fort Mason where they were found roosting in trees located behind the headquarter buildings where there is a substantial eucalyptus grove. While there are planted Monterey pine trees on the project site, there are not enough to be considered a potential roosting site because they do not provide habitat that is protected from the elements. Therefore, there is no potential for Monarch butterflies to overwinter on the project site.

Bumble Bees

There are two bumble bee species, Western bumble bee (*Bombus occidentalis*) and obscure bumble bee (*Bombus caliginosus*), that are considered for the project area. The Western bumble bee is a generalist forager that occurs along the Pacific coast and western interior of North America. They depend on habitat with rich floral resources for nectar and suitable nesting sites. Habitat types include mixed woodlands, croplands, montane meadows, edges of grasslands, and urban areas. Western bumble bees typically nest in underground cavities like abandoned rodent burrows and in west-southwest slopes bordered by trees. Their colony's life cycle is annual, ranging from early February to late November, and rely on nectar resources that are available throughout this period. Nectar resource plants include *Ceanothus, Centaurea, Chrysothamnus, Cirsium, Geranium, Grindellia, Lupinus, Melilotus, Monardella, Rubus, Solidago,* and *Trifolium.*[95] Western bumble bee has 7 CNDDB occurrences within 5 miles of the project site, though all but one occurrence are from over 50 years ago. As a generalist forager, this species potentially occurs where flowering plants bloom within its range, however, the project site lacks preferred foraging and nesting habitat.

The obscure bumble bee also occurs along the Pacific Coast, though it is currently mostly limited to the fog belt where it inhabits open coastal prairies and meadows. Like the Western bumble bee, the obscure bumble bee nests mostly underground or in abandoned bird nests. Their nectar resources are diverse and can include *Ceanothus, Cirsium, Clarkia, Keckiella, Lathyrus, Lotus, Lupinus, Rhododendron, Rubus, Trifolium,* and *Vaccinium.* There are 3 CNDDB occurrences within 5 miles of the project site, all of which were last updated in 2009 from a map provided by the Presidio Trust. The closest occurrence (Occurrence number 178) is 1.19 miles away from the project site, mapped in Thompson Reach within the Presidio. Thompson Reach is a habitat restoration site planted with native species to promote a higher diversity of pollinators. Similar to Western bumble bees, this species could potentially occur wherever flowering plants bloom within its range, however, there is no suitable nesting habitat due to the compacted soils on site.

[95] Williams, P.H., et al. 2014. *The Bumble bees of North America: An Identification Guide*. Princeton University Press. Princeton.

Both the Western bumble bee and the obscure bumble bee have historically been found in San Francisco but have significantly declined and shown little recovery in the urban landscape. McFrederick and LeBuhn (2006) sampled bumble bees in 18 urban parks in San Francisco and 2 nearby wild parks to understand whether urban parks can act as refuges for native bumble bee species[96]. Both Western bumble bees and obscure bumble bees were not detected in any of the urban parks before, during, and after the sampling periods by those sampling in plots and outside of plots, as well as by volunteer observers within the City. McFrederick and LeBuhn compared their collections with previous records from San Francisco and determined, with confidence, that if these species were present, they would have been detected. Based on these findings, it is unlikely that the project site and the urban parks directly adjacent to it provide suitable habitat for Western bumble bees and obscure bumble bees, which rely on higher floral resource diversity and connectivity to other habitats.

No special-status species are known or expected to occur on or in the vicinity of the site due to its urbanized condition and lack of suitable habitat. As such, implementation of the proposed project would not have a substantial adverse effect, either directly or through habitat modification, on any species identified as candidate, sensitive, or special status species.

Existing street trees could support native nesting birds that are protected under the California Fish and Game Code or the Migratory Bird Treaty Act (MBTA), which protect special-status bird species. The proposed project would remove one street tree along the Bay Street frontage that would be replaced within close proximity to its original location, in addition to planting six new street trees along the project site frontage on Laguna Street. The proposed project would also remove 25 trees on the project site and would plant 34 new trees. Tree removal during the bird breeding season could impact nesting birds, resulting in a significant impact. However, compliance with the requirements of the Fish and Game Code and the migratory bird act would ensure that there would be no loss of active nests or bird mortality. To ensure the protection of nesting birds, **Mitigation Measure M-BI-1: Nesting Bird Protection** has been identified and agreed to by the project sponsor. Mitigation Measure M-BI-1 would require that tree removal and construction activities take place outside the nesting season to the extent possible. If trees are to be removed during the nesting season, this mitigation measure requires a pre-construction survey for nesting birds and establishes a “no construction” buffer around active nests until the young have fledged. With implementation of Mitigation Measure M-BI-1: Nesting Bird Protection, impacts to native or migratory nesting birds would be reduced to less than significant.

Mitigation Measure M-BI-1: **Nesting Bird Protection.** Nesting birds and their nests shall be protected during construction by implementation of the following:

a. To the extent feasible, the project sponsor shall conduct initial activities including, but not limited to, vegetation removal, tree trimming or removal, ground disturbance, building demolition, site grading, and other construction activities that may compromise breeding birds or the success of their nests outside of the nesting season (January 15 through August 15).

[96] McFrederick, Q.S. and LeBuhn, G. 2006. Are urban parks refuges for bumble bees *Bombus* spp. (Hymenoptera: Apidae)? *Biological Conservation* 129(3): 372-382.

b. If vegetation removal and other construction activities during the bird nesting season cannot be fully avoided, a qualified wildlife biologist shall conduct pre-construction nesting surveys within 72 hours prior to the start of vegetation removal, construction or demolition at areas that have not been previously disturbed by project activities or after any construction breaks of 72 hours or more. Typical experience requirements for a "qualified biologist" include a minimum of four years of academic training and professional experience in biological sciences and related resource management activities and a minimum of two years of experience in biological monitoring or surveying for nesting birds. Surveys of suitable habitat shall be performed in publicly accessible areas within 100 feet of the project site in order to locate any active nests of common bird species and within 250 feet of the project site to locate any active raptor (birds of prey) nests.

c. If active nests are located during the pre-construction nesting bird surveys a qualified biologist shall evaluate if the schedule of construction activities could affect the active nests; if so, the following measures shall apply, as determined by the biologist:

    i) If construction is not likely to affect the active nest, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the surrounding construction activity to confirm there is no adverse effect. Spot-check monitoring frequency would be determined on a nest-by-nest basis considering the particular construction activity, duration, proximity to the nest, and physical barriers that may screen activity from the nest. The qualified biologist may revise their determination at any time during the nesting season in coordination with the planning department.
    ii) If it is determined that construction may affect the active nest, the qualified biologist shall establish a no-disturbance buffer around the nest(s) and all project work shall halt within the buffer until a qualified biologist determines the nest is no longer in use. These buffer distances shall be equivalent to the survey distances (100 feet for passerines and 250 feet for raptors); however, the buffers may be adjusted if an obstruction, such as a building, is within line of sight between the nest and construction.
    iii) Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be done at the discretion of the qualified biologist and in coordination with the planning department and CDFW, if necessary. Necessary actions to remove or relocate an active nest(s) shall be coordinated with the planning department and approved by CDFW, if necessary.

iv) Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to project work within the buffer are observed and could compromise the nest, work within the no disturbance buffer(s) shall halt until the nest occupants have fledged.

v) Any birds that begin nesting within the project area and survey buffers amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels, so no-disturbance buffer zones around nests may be reduced or eliminated in these cases as determined by the qualified biologist in coordination with the planning department and CDFW, if necessary. Work may proceed around these active nests as long as the nests and their occupants are not directly affected.

vi) In the event inactive nests are observed within or adjacent to the project site at any time throughout the year, any removal or relocation of the inactive nests shall be at the discretion of the qualified biologist in coordination with the planning department and CDFW, as appropriate. Work may proceed around these inactive nests.

Impact BI-2: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. ***(Less than Significant)***

The City's Urban Forestry Ordinances (Public Works Code section 801 et seq) requires a permit from the San Francisco Public Works to remove any protected trees. Protected trees include landmark trees[97], significant trees[98], or street trees on public or private property anywhere within the City limits. The proposed project would include the removal of one street tree on Bay Street that would be replaced in close proximity to its original location per public works code section 806; additionally, six new street trees would be planted along the Laguna Street frontage. The proposed project would remove 25 trees on the project site and plant 34 new trees for a net increase of nine trees on the project site. However, none of these trees proposed for removal are protected under the Urban Forestry Ordinance. There is one significant tree at the northwest corner of the project site that will not be removed or disturbed. Therefore, the proposed project would not conflict with the City's local tree ordinance, and the impact would be less than significant. No mitigation measures are required.

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[97] Landmark trees are designated by the San Francisco Board of Supervisors. Landmark trees are protected from physical damage and removal, There are currently 23 designated landmark trees in San Francisco.

[98] Significant trees are trees on private property within 10 feet of the public right of way and must meet one of the following three characteristics: 20 feet or greater in height, 15 feet or greater canopy width, or 12 inches or greater diameter or trunk measure at 4.5 feet above grade.

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)***

The project would not result in any cumulative impacts to the movement of native migratory wildlife as it would not result in any net decrease to street trees or on-site trees that that would be used for bird nesting and would comply with the with the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA). Cumulative projects would be required to comply with the above cited regulations, and therefore would avoid significant cumulative impacts to biological resources.

All projects within San Francisco are required to comply with the Urban Forestry Ordinance, which would ensure that any cumulative impact resulting from conflicts with the City ordinance protecting trees would be less than significant. No mitigation measures are required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.16. GEOLOGY AND SOILS. 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.	☐	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
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 off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☒	☐
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐	☐

Comments received in response to the NOP included concerns regarding the potential for excavation activities to undermine the structural integrity of the Julia Morgan building and other surrounding properties. Additional comments expressed concerns that the proposed project is built on soils that are prone to subsidence and liquefaction.

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

There are no known active faults intersecting the project site and the site is not located within a State of California Earthquake Fault Zone as defined by the Alquist Priolo Earthquake Fault Zoning Act. The closest active fault is the San Andreas fault, which is located approximately 13 miles west of the project site. Therefore, the potential of surface rupture occurring from active faulting at the site is low. As such, the proposed project would not exacerbate the potential for surface rupture and therefore would have no impact on fault ruptures and no mitigation would be required.

Liquefaction and Lateral Spreading

Liquefaction and lateral spreading of soils can occur when ground shaking causes saturated soils to lose strength due to an increase in pore pressure. The geotechnical investigation[99] indicates that the project is not within an area that has been mapped as a designated seismic hazard zone for liquefaction. Additionally, there was no reported ground failures at the project site during the 1906 San Francisco Earthquake or the 1989 Loma Prieta Earthquake. The geotechnical investigation conducted on site found that there are deep, thin zones of potentially liquefiable soil in the northern portion of the site and thicker zones of potentially

[99] Rockridge Geotechnical, Geotechnical Investigation, Proposed New Buildings, Heritage on the Marina, January 9, 2024.

liquefiable soil in the central and southern portions of the site. The thickest layers were encountered between depths of 32 and 42 feet. However, the investigation concludes that the non-liquefiable soil overlying the potentially liquefiable soil layers are sufficiently thick and the potentially liquefiable layers are sufficiently thin such that the potential for surface manifestation from liquefaction, such as sand boils and loss of bearing capacity for shallow foundations, are low.

Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. The geotechnical investigation uses a variety of empirical measures to assess the potential for lateral spreading to occur at the project site. The results of the analysis indicate the that the liquefiable soil layers on the project site have sufficiently high relative density and are discontinuous such that potential for lateral spreading to occur at the site is low. Therefore, impacts would be less than significant, and no mitigation would be required.

Strong Seismic Ground Shaking

The San Francisco Bay Area is an active seismic region. Earthquakes in the region result from strain energy constantly accumulating because of the northwestward movement of the Pacific Plate relative to the North American Plate. Historically, the Bay Area has experienced large, destructive earthquakes in 1838, 1868, 1906, and 1989. According to the geotechnical investigation,[100] the seismicity of the project site is governed by the activity from the San Andreas fault, approximately 13 miles to the west of the project site, although ground shaking from future earthquakes on other faults, including the Hayward, Calaveras, and San Gregorio faults will also be felt on the project site.

In the future, the project site will undoubtedly experience severe ground shaking during moderate and large magnitude earthquakes produced along the San Andreas fault or other active Bay Area fault zones. Using information from recent earthquakes, improved mapping of active faults, ground motion prediction modeling, and a new model for estimating earthquake probabilities, a panel of experts convened by the United States Geological Survey (USGS) have concluded there is a 72 percent chance for at least one earthquake of Magnitude 6.7 or larger in the San Francisco Bay Area before 2044. The Hayward fault, which has the highest likelihood of an earthquake greater than or equal to magnitude 6.7 in the Bay Area is estimated at 25 percent, while the likelihood on the Calaveras and San Andreas faults is estimated at approximately 21 and 17 percent, respectively.[101]

The geotechnical investigation concludes that the project site will experience strong to very strong ground shaking should an earthquake occur at one of the nearby faults. Overall, the geotechnical investigation concludes the site would be suitable for the proposed expansion provided the recommendations presented in the report are followed during design and construction. Additionally, the proposed project would be required to comply with the California Building Code (state building code, California Code of Regulations, Title 24) and the San Francisco Building Code, described in more detail below, which ensures the safety of all new construction in the state and City, respectively. Therefore, the proposed project would not have the potential to exacerbate seismic-related ground shaking, and as a result, would have a less-than-significant impact on strong seismic ground shaking. No mitigation would be required.

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100 Rockridge Geotechnical, Geotechnical Investigation, Proposed New Buildings, Heritage on the Marina, January 9, 2024.

101 Ibid.

Landslides

As indicated in the geotechnical investigation, the project is not located within an Earthquake Induced Landslide Zone per the California Geological Survey. Additionally, the project site is mostly flat land with little potential for landslides as a result of sloped land failure. There would be no impacts related to the potential for landslides to occur at the project site and this impact 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 Heritage on the Marina residential care facility. The proposed project would require the excavation of approximately 9,060 cubic yards of soil to a depth of approximately 15 feet. As a result, the site could be affected by windborne and waterborne erosion during construction activities. The project sponsor and its contractor would be required to comply with section 146, Construction Site Runoff Control, of the public works code which requires all construction sites to implement best management practices to minimize surface runoff erosion and sedimentation.[102] Pursuant to section 146.7, if construction activities disturb 5,000 square feet or more of ground surface, the project sponsor must develop an erosion and sediment control plan. The erosion and sediment control plan must be submitted to public utilities commission staff for review and approval prior to commencing construction-related activities. The erosion and sediment control plan would identify best management practices to control discharge of sediment and other pollutants from entering the City's combined sewer system during construction. The project would be subject to these requirements.

San Francisco Building Code section 1805 (Dampproofing and Waterproofing) requires the geotechnical report to identify the location of the existing groundwater table in relation to the lowest floor level, and cites conditions when a subsoil drainage system must be designed to ensure that water flows into an approved drainage system. In addition, as discussed in Impact UT-1, the City's stormwater management ordinance includes requirements that would reduce stormwater runoff discharged from the project site.

Compliance with section 146 of the public works code, sections 1804 and 105 of the building code, and the stormwater management ordinance would ensure that the proposed project would not result in substantial loss of topsoil or soil erosion. Therefore, impacts related to loss of topsoil or substantial soil erosion during construction would be less than significant and no mitigation would be required.

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 described in the geotechnical investigation, and in the discussion of Impact GE-1, the project would have little potential to result in lateral spreading, liquefaction, and landslides. In addition, the proposed project would be required to comply with state and local building codes. Adherence to these requirements would

[102] SFPUC. 2018. San Francisco Construction Site Runoff Control Program. Available online at https://sfpuc.org/programs/pretreatment-program/construction-site-runoff. Accessed April 12, 2024.

further ensure that the project sponsor adequately addresses any potential impacts related to unstable soils as part of the design-level geotechnical investigation that would be prepared for the proposed project. Therefore, any potential impacts related to unstable soils would be less than significant, and no mitigation measures would be 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 expand and contract in response to changes in soil moisture, most notably when nearby surface soils change from saturated to a low-moisture content condition and back again. The expansion potential of the project site soil is considered to be low due to the presence of low-plasticity silt and some low-plasticity clay deposits. Applicable state and local building codes require a confirmation of the presence of expansive soils at the project site and, if applicable, implementation of measures to address this issue as part of the design-level geotechnical investigation prepared for the proposed project. Therefore, potential impacts related to expansive soils would be less than significant, and no mitigation measures would be required.

Impact GE-5: The proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. ***(No Impact)***

The proposed project would connect to San Francisco's sewer and stormwater collection and treatment system. It would not use a septic water disposal system. As such, the proposed project would not have no impact on the use of septic tanks or alternative wastewater disposal systems and no mitigation would be required.

Impact GE-6: The proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. ***(Less than Significant)***

Geologic Features

The project site is currently developed with the existing buildings associated with the operation of the Heritage on the Marina residential care facility that covers the entirety of the site. There are no unique geologic features at the project site. Therefore, the proposed project would have no impact on any unique geological features of the site and no mitigation would be required.

Paleontological Features

Paleontological resources include fossilized remains or traces of mammals, plants, and invertebrates, as well as their imprints. Such fossil remains, as well as the geological formations that contain them, are also considered a paleontological resource. Together, they represent a limited, non-renewable scientific and educational resource. To identify impacts on paleontological resources, the paleontological sensitivity of geologic units present within the project site were identified. Paleontological sensitivity is an indicator of the

likelihood of a geologic unit to yield fossils.[103] The fossil-yielding potential of geologic units in a particular area depends on the geologic age and origin of the units, as well as on the processes they have undergone, both geologic and anthropogenic.[104] 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 site is underlain by Quaternary-age beach and Dune sand with approximately 1.5 to 18 feet of fill underlying native Dune sand. The fill thickness is generally less than 7 feet on the northern and central portions of the site and between approximately 8 and 18 feet on the southern portion of the site. The geologic unit underlying the fill has a low potential to yield significant fossils. Therefore, the 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)***

Geology and soils impacts are generally site-specific and localized. Cumulative development projects could require various levels of excavation or cut-and-fill, which could affect local geologic conditions, similar to the proposed project. As noted above, the San Francisco Building Code regulates construction in the City and County of San Francisco, and all development projects would be required to comply with its requirements to ensure maximum feasible seismic safety and minimize geologic impacts. Site-specific measures would also be implemented, as site conditions warrant, to reduce any potential impacts from unstable soils, ground shaking, liquefaction, or lateral spreading.

There are no actively planned projects within the vicinity of the project site that would contribute to cumulative impacts to geology, soils, or paleontological resources. Therefore, no significant cumulative geology and soils impact would occur, and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.17. HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐	☐

[103] Society of Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Available: http://vertpaleo.org/Membership/Member-Ethics/SVP _Impact_Mitigation_ Guidelines.aspx. Accessed April 12, 2024.

[104] Anthropogenic means caused by human activity.

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?	☐	☐	☒	☐	☐
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;	☐	☐	☒	☐	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;	☐	☐	☒	☐	☐
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	☐	☐	☒	☐	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐	☐

According to SFPUC 100-Year Storm Flood Risk Map, the project site is not located within a 100-year flood hazard area,[105] or an area identified as being subject to potential inundation in the event of a tsunami along the San Francisco coast or a dam or levee failure.[106] 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.17(d) is not applicable to the proposed project and is not discussed below.

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105 San Francisco Public Utilities Commission, 100-Year Storm Flood Risk Map, 2019. Available online at: https://sfplanninggis.org/floodmap/. Accessed April 12, 2024

106 City and County of San Francisco, Community Safety Element of the San Francisco General Plan, 2012, Map 5 (Tsunami Hazard Zones San Francisco) and Map 6 (Potential Inundation Areas Due to Reservoir Failure), https://generalplan.sfplanning.org/Community_Safety_Element_2012.pdf. Accessed April 12, 2024.

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)*

Construction activities such as excavation would expose soil and could result in erosion and excess sediment being carried in stormwater runoff to the combined stormwater/sewer system. In addition, stormwater runoff from temporary on-site use and storage of vehicles, fuels, waste, and other hazardous materials could carry pollutants to the combined stormwater/sewer system if proper handling methods are not employed. Project-related wastewater and stormwater would flow to the City's combined stormwater/sewer system and would be treated to standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. The NPDES standards are set and regulated by the regional board. Therefore, because the proposed project's wastewater and stormwater would be treated at the Southeast Water Pollution Control Plant to state standards, the proposed project would not conflict with regional board requirements. The proposed project would also be required to comply with sections 146 and 147 of the public works code, which include requirements for the discharge of sediment and other pollutants from construction sites and to reduce the volumes of stormwater entering the combined stormwater/sewer system. Finally, in the event that construction dewatering is needed, the proposed project would be required to obtain a Batch Wastewater Discharge Permit (BWDP) from the SFPUC prior to any dewatering activities. The BWDP permit would contain appropriate discharge standards and may also require the installation of meters to measure the volume of discharge. These measures would ensure protection of water quality during construction of the proposed project. The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade water quality. This impact would be less than significant, and no mitigation measures are necessary.

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)*

The project site is in the Marina San Francisco groundwater basin.[107] This basin is not used as a potable water source and there are no plans for development of this basin for groundwater production. The Marina basin is not included in the SFPUC groundwater management program at this time. The proposed project would continue to be connected to the existing SFPUC potable water infrastructure and would not rely on wells for its water supply. Furthermore, the existing site is covered mostly in impervious surfaces, so that infiltration of rainwater into the groundwater basin and groundwater recharge at the project site is currently minimal. This condition would continue under the proposed project because after construction the site would consist of impervious surfaces, except for the addition of street trees and limited landscaping features. Therefore, operation of the proposed project would not deplete groundwater supplies in the project area or conflict with a sustainable groundwater management plan.

[107] State of California Department of Water Resources, DWR Mapping Tool, https://sgma.water.ca.gov/webgis/index.jsp?appid=gasmaster&rz=true, Accessed April 12, 2024.

As discussed in Section E.16, Geology and Soils, while groundwater was not encountered during field investigation borings, groundwater depths are estimated to be at a high of 15 feet below ground surface across the project site. As described in the draft EIR Chapter 2, Project Description, the proposed project would require excavation to depths of a maximum of 15 feet and therefore groundwater could be encountered during construction or excavation and dewatering could be required. Dewatering during construction would be temporary and limited to the construction period, and therefore would not substantially deplete groundwater supplies or interfere with groundwater recharge. Project operation would not extract groundwater. Therefore, groundwater resources would not be substantially depleted, and the proposed project would not otherwise substantially interfere with groundwater recharge or impede sustainable groundwater management. The proposed project would have a less-than-significant impact on groundwater supplies or management, and no mitigation measures are necessary.

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 off site; that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or that would impede or redirect flood flows. ***(Less than Significant)***

No streams or rivers exist at the project site. Therefore, the proposed project would have no impact related to alteration of drainage patterns by altering the course of a stream in a manner that would cause erosion, flooding, or siltation on site or off site. The project site is developed with existing buildings and paved surfaces occupying 37,066 square feet of impervious surfaces. The proposed project would result in a minor increase of 3,480 square feet of impervious surface for a total of 40,546 square feet of impervious surfaces. The proposed project would require the excavation of approximately 9,060 cubic yards of soil to depths of approximately 15 feet in one portion of the site. 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 off site. 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, and 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)***

As previously discussed, the proposed project's wastewater and stormwater would be treated at the Southeast Water Pollution Control Plant to state standards prior to discharge into the bay, and therefore would not conflict with or obstruct implementation of the San Francisco Bay Water Quality Control Plan. The proposed project would not significantly decrease groundwater supplies or substantially interfere with groundwater recharge, nor would it substantially alter the drainage pattern of the site or area.

For these reasons, the project would have a less-than-significant impact related to conflicting or obstructing implementation of a water quality control plan or sustainable groundwater plan. No mitigation measures are 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 proposed project and all reasonably foreseeable projects within San Francisco would be required to comply with the City's stormwater management ordinance and guidelines and dewatering and drainage control requirements, and all stormwater and wastewater would be treated to the standards in the City's NPDES permit. These requirements would ensure that both runoff water quality and runoff volumes are managed in a way that does not adversely affect water quality, create flooding, or exceed infrastructure capacity, both on an individual basis and cumulatively since these regulations inherently consider cumulative effects. Because other cumulative development would be required to comply with drainage, dewatering, and water quality regulations, similar to the proposed project, peak stormwater runoff rates and volumes for the design storm would gradually decrease over time with new development, thus no significant cumulative effects would occur. Therefore, cumulative impacts related to increased run-off and water quality would be less than significant.

With regards to groundwater, the Marina Groundwater Basin is not a potable water source. Further, upon completion of construction activities, the project would have no impact on groundwater levels. For these reasons, the project would not combine with cumulative development projects to result in cumulative groundwater impacts.

Overall, the proposed project would not combine with cumulative development to result in cumulative impacts to hydrology and water quality. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.18. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

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?	☐	☐	☒	☐	☐
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?	☐	☐	☐	☐	☒
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?	☐	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☐	☒

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; is not located within an airport land use plan area or within an airport land use plan, or within two miles of a public airport or public use airport which would result in a safety hazard or excessive noise for people residing or working in the area; and is not located within or adjacent to a wildland area. Therefore Topics E.18(d), E.18(e), and E.18(g) are not applicable to the proposed project.

Comments received in response to the NOP related to hazards and hazardous materials included concerns that project construction will result in the disturbance of VOCs, asbestos, and lead based paints that will become airborne and harm nearby sensitive receptors. Additional comments included concerns about the project compliance with the Maher ordinance due to the project's proximity to former PG&E North Beach Manufactured Gas Plants.

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)***

Hazardous materials may be stored on site during construction of the proposed project. These hazardous materials include fuel for construction equipment, paints, solvents, and other types of construction materials that may contain hazardous ingredients. Transportation of hazardous materials to and from the project site would occur on designated hazardous materials routes, by licensed hazardous materials handlers, as required, and would be subject to regulation by the California Highway Patrol and the California Department of Transportation. Compliance with these regulations would reduce any risk from the routine transport, use, or disposal of hazardous materials to a less-than-significant level and no mitigation would be required.

Similar to existing conditions on the project site, the proposed project would likely result in the use of common types of hazardous materials, such as cleaning products and disinfectants. These products are labeled to inform users of their potential risks and to instruct them in appropriate handling procedures. In addition, the proposed project likely would result in the routine generation and disposal of medical waste, similar to existing conditions. The project would be subject to San Francisco Department of Public Health permitting requirements for generating and storing medical waste pursuant to article 25 of the public health code. The Heritage on the Marina currently contracts with a vendor to handle disposal of medical waste off the project site and would continue to be subject to regulation by the California Department of Toxic Substances Control.[108] Compliance with these regulations would reduce any risk from the routine transport, storage, or disposal of medical waste to a less-than-significant level, and no mitigation would be 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)***

A portion of the project site is located in an area of San Francisco governed by article 22A of the health code, also known as the known as the Maher Ordinance, meaning that it is known or suspected to contain contaminated soil and/or groundwater.[109] 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. Projects that disturb 50 cubic yards or more of soil that are located on sites with potentially hazardous soil or groundwater are subject to this ordinance. The proposed project would require excavation of approximately 9,060 cubic yards of soil to a maximum depth of 15 feet. The total area of soil disturbance would be 29,750 square feet. Therefore, the proposed project is subject to the Maher Ordinance, which is administered and overseen by the San Francisco Department of Public Health (health department). The project sponsor submitted an application to the Maher Program and retained the services of a qualified professional to prepare a phase I environmental site assessment (site assessment) that meets the requirements of article 22A. The findings of the site assessment are discussed below.[110]

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[108] California Department of Toxic Substances Control, Hazardous Waste Transporter Registration Certificate for Medical Environmental Technologies, LLC, October 2023. The Heritage on the Marina contracts with Medical Environmental Technologies, LLC (MET), a medical waste disposal company, to handle the disposal of medical waste in compliance with the California Department of Toxic Substances Control.

[109] San Francisco Planning Department, San Francisco Property Information Map – Map Viewer, 2019 Available online at: https://sfplanninggis.org/pim/. Accessed December 2023.

[110] Cornerstone Earth Group, Phase I Environmental Site Assessment, 3400 Laguna Street, San Francisco, California, February 16, 2023.

To identify the site's potential inclusion on environmental databases and evaluate offsite environmental concerns, Cornerstone Earth Group reviewed a site-specific radius report provided by Environmental Data Resources, Inc. which searched regulatory agency lists and databases for recorded sites within the industry standard search radii. According to the site assessment the project site has been developed since 1925. The project site is listed on the HAZNET, HWTS, RCRA NonGen/NLR databases. Waste disposed between 1990 and 2017 were categorized on the HAZNET and HWTS databases as asbestos containing waste. The RCRA NonGen/NLR database listing indicates that the site is no longer an active hazardous waste generator.

The site is surrounded by the former Fort Mason on the north, which is identified as a Formerly Used Defense Site (FUDS) and as a closed case on a database of military underground storage tank (UST) sites; the 1435 Bay Street building on the east, which was identified as a closed case on the leaking underground storage tank (LUST) database; and the former PG&E North Beach Manufactured Gas Plant to the northwest, which is identified as an open case on the EnviroStor database, among others. Based on database review, reported releases at the adjoining properties do not appear likely to have impacted soil, soil vapor, or groundwater at the site. However, several volatile organic compounds (VOCs) have been reported in groundwater from a monitoring well located adjacent to the west of the site within the Laguna Street right-of-way. This well is periodically sampled as part of the on-going groundwater monitoring activities associated with the former PG&E North Beach Manufactured Gas Plant property located to the northwest of the site. During sampling between 2016 and 2018, VOCs including tetrachloroethene (PCE) and trichloroethene (TCE) were reported in groundwater from the well at concentrations that were above the Water Board's environmental screening levels (ESLs) for residential properties, resulting in potential vapor intrusion concerns. The source of these VOCs is unknown but these chemicals are most commonly associated with dry-cleaning solvent.

The project sponsor submitted a Maher Application and the Phase I environmental site assessment to the San Francisco Department of Health in accordance with article 22A.[111] The proposed project would be required to remediate any potential soil or groundwater contamination described above that is on the project site in accordance with article 22A of the health code. The health department would oversee this process, and various regulations would apply to any disturbance of contaminants in soil or groundwater that would be encountered during construction to assure that no unacceptable exposures to the public would occur. Thus, the proposed project would not result in a significant hazard to the public or environment from the disturbance or release of contaminated soil and groundwater and the proposed project would result in a less than significant impact. No mitigation is required.

Asbestos-Containing Materials

The project site is occupied by a building that was originally constructed in 1925 with later additions built in 1957 and 1963. These later additions (the Perry Connecter and Health Care Center) would be demolished. Due to the age of the on-site structures, asbestos-containing materials may still be present in building materials that could become airborne as a result of demolition or renovation disturbance.

The California Department of Toxic Substance Control considers asbestos hazardous, and removal of asbestos-containing materials is required prior to demolition or construction activities that could result in disturbance of these materials. Asbestos-containing materials must be removed in accordance with local and state regulations, the Bay Area Air Quality Management District (air district), the California Occupational

[111] San Francisco Department of Public Health. Maher Zone Application for 3400 Laguna Street. January 5, 2024.

Safety and Health Administration (occupational safety and health administration), and California Department of Health Services requirements.

Specifically, section 19827.5 of the California Health and Safety Code requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California legislature vests the air district with the authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and the air district is to be notified 10 days in advance of any proposed demolition or abatement work. Any asbestos-containing material disturbance at the project site would be subject to the requirements of air district Regulation 11, Rule 2: Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of the occupational safety and health administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in Title 8 of California Code of Regulations section 1529 and sections 341.6 through 341.14, where there is asbestos related work involving 100 gross square feet or more of asbestos-containing material. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California law, the building department would not issue the required permit until the applicant has complied with the requirements described above.

These regulations and procedures already established as part of the building permit review process would ensure that any potential impacts due to asbestos-containing materials would be less than significant and no mitigation would be required.

Lead-Based Paint

Similar to asbestos-containing materials, lead-based paint could be present at the site, based on the age of the buildings. Work that could result in disturbance of lead paint must comply with section 3426 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to 1979, section 3426 requires specific notification and work standards, and identifies prohibited work methods and penalties. (The reader may be familiar with notices commonly placed on residential and other buildings in San Francisco that are undergoing re-painting. These notices are generally affixed to a drape that covers all or portions of a building and are a required part of the section 3426 notification procedure.)

Section 3426 applies to the exterior of all buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces, unless demonstrated otherwise through laboratory analysis), and to the interior of residential buildings, hotels, and child care centers. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the U.S. Department of Housing and Urban Development Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbances or removal of lead-based paint. Any person performing work subject to the ordinance shall, to the maximum extent possible, protect the ground from contamination during exterior work; protect floors and other horizontal surfaces from work debris during interior work; and make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work.

Clean-up standards require the removal of visible work debris, including the use of a High Efficiency Particulate Air Filter (HEPA) vacuum following interior work.

The ordinance also includes notification requirements and requirements for signs. Prior to the commencement of work, the responsible party must provide written notice to the director of the building department, of the address and location of the project; the scope of work, including specific location within the site; methods and tools to be used; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential, owner-occupied or rental property; the dates by which the responsible party has fulfilled or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include a Posted Sign notifying the public of restricted access to the work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Notice of Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. Section 3426 contains provisions regarding inspection and sampling for compliance by the San Francisco Department of Building Inspection, as well as enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

The proposed demolition would also be subject to the occupational safety and health administration's Lead in Construction Standard (8 CCR section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead would be disturbed during construction. The plan must describe activities that could emit lead, methods that will be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction activities. The occupational safety and health administration would require 24-hour notification if more than 100 square feet of materials containing lead would be disturbed.

These regulations and procedures discussed above would ensure that any potential impacts due to lead-based paint would be less than significant and no mitigation would be 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 closest schools to the project site are Marina Middle School, located at 3500 Fillmore Street which is approximately 0.4 mile west of the project site and Guidepost Montessori located at 3741 Buchannan Street which is approximately 0.2 mile northwest of the project site. However, as described in Impact HZ-1, hazardous materials used during project operation would not pose any substantial public health or safety hazards through their routine transport, use, or disposal. As noted in Impact HZ-2, the project sponsor is required to comply with health code article 22A, which would ensure the project would not result in a significant hazard to the public or environment due to the release of hazardous soil and groundwater. Similarly, hazardous building materials, such as asbestos and lead, would be remediated in accordance with regulatory requirements. These regulations, discussed in Impact HZ-2, would ensure that the proposed project would not emit hazardous emissions, and would not handle hazardous or acutely hazardous materials, substances, or waste. Therefore, this impact would be less than significant, and 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)***

San Francisco ensures fire safety primarily through provisions of the building and fire codes. Final building plans are reviewed by the San Francisco Fire Department (as well as the building department), to ensure conformance with these provisions. In this way, potential fire hazards, including those associated with hydrant water pressures and emergency access, would be addressed during the permit review process. Compliance with fire safety regulations would ensure that the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan or expose people or structures to a significant risk of loss, injury, or death involving fires.

The proposed project, located within a city block, would not impair implementation of an emergency response or evacuation plan adopted by the City as project construction and operation is not anticipated to close roadways or impede access to emergency vehicles or emergency evacuation routes. Any potential roadway closures related to construction, if needed, would comply with the San Francisco Regulations for Working in San Francisco Streets requirements, and require coordination with the SFMTA. Implementation of the proposed project would not result in a substantial amount of new vehicle trips and therefore would not add to congested traffic conditions in the immediate area in the event of an emergency evacuation. Therefore, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan and this impact would be less than significant, and no mitigation is required.

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)***

The geographic context for an analysis of cumulative impacts related to handling of hazardous materials is generally confined to the project site and the nearby surrounding area. The Marina Improvement and Remediation Project, located approximately 830 feet from the project site, includes investigation and remediation of sediments in East Harbor and under the oversight of State regulatory agencies. This cumulative project, including remediation activities, would be conducted under agency oversight and would be required to implement protection measures to ensure that no significant impacts occur to human health or the environment, similar to the proposed project. For these reasons, the proposed project would not combine with cumulative development in the project vicinity to create a significant cumulative impact related to hazards and hazardous materials. Cumulative hazardous materials impacts would be less than significant, and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.19. ENERGY. 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?	☐	☐	☒	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐	☐

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)***

In California, energy consumption in buildings is regulated by Title 24 of the California Code of Regulations. Title 24 includes standards that regulate energy consumption for the heating, cooling, ventilation, and lighting of residential and non-residential buildings. In San Francisco, documentation demonstrating compliance with Title 24 standards is required to be submitted with a building permit application. Compliance with Title 24 standards is enforced by the building department. The proposed project, which would be located on a developed site, would include the expansion and renovation of the existing residential care facility. The proposed project would be required to comply with the standards of Title 24 and the requirements of the San Francisco Green Building Code.

Non-renewable energy consumption would occur during the proposed project construction and operational phases. Construction energy consumption would be primarily in the form of fuel used by construction equipment. Construction-related energy consumption is roughly proportional to the size of the new buildings proposed.

Operational-related energy consumption would include electricity used by residents and staff as well as fuel to go to and from the project expressed through vehicle miles traveled (VMT). Electricity would continue to be used for lighting, equipment, domestic hot water and building space conditioning.

Energy conservation design features that meet state and local goals for energy efficiency and renewable energy have been incorporated into the project design to reduce wasteful, inefficient, and unnecessary consumption of energy during project construction and operation, as demonstrated in the GHG checklist completed for the proposed project.[112] Specifically, to meet CALGreen[113] requirements, the project would use

[112] San Francisco Planning Department, Greenhouse Gas Analysis: Compliance Checklist for the Heritage on the Marina Project, 3400 Laguna Street, November 27, 2023.

[113] CALGreen is the California Green Buildings Standards Code, Part 11, Title 24, California Code of Regulations.

a mechanical system which requires use of rooftop compressors. In addition, new buildings would meet Title 24 requirements for photovoltaic solar panels on building flat roof areas.

As identified above, the residential care facility already exists, and the proposed project would result in a minor expansion of residential care suites on site from 86 to 109. Additionally, the proposed project would generate a small number of new vehicle trips. As an infill project in a low-VMT area, the proposed project inherently would not result in a wasteful or inefficient use of energy resources. In addition, compliance with the City's Commuter Benefits Ordinance, TDM requirements, and bicycle parking requirements would minimize the amount of transportation fuel consumed. Given the project's features and location, it would not result in wasteful use of fuel from vehicle trips. For these reasons, the proposed project would not use energy resources in a wasteful, inefficient, or unnecessary manner, nor would the proposed project conflict with or obstruct implementation of a state or local plan for renewable energy or energy efficiency. This impact would be less than significant, and no mitigation would be 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)***

As discussed in Impact EN-1 above, the proposed project would not use energy resources in a wasteful, inefficient, or unnecessary manner, nor would the proposed project conflict with or obstruct implementation of a state or local plan for renewable energy or energy efficiency. This impact would be less than significant, and no mitigation would be 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 context for the analysis of cumulative impacts associated with energy is the service territory of the energy utility that serves the project site, PG&E, while the geographic context for the analysis of cumulative impacts associated with fuel use is the City. The proposed project would result in a total expansion of approximately 58,380 square feet of building space and the addition of 23 residential care suites. Like the proposed project, all new development in the City would be required to comply with the standards of Title 24 and the San Francisco Green Building Code, thereby minimizing the amount of fuel, water, and energy used. Per capita VMT in the City is relatively low compared with the regional average; therefore, cumulative development, including the project, would not result in wasteful use of fuel from transportation. As such, the proposed project, in combination with cumulative development, would have less-than-significant cumulative energy impacts and no mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
E.20. MANDATORY FINDINGS OF SIGNIFICANCE. 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?	☒	☐	☐	☐	☐
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.)	☒	☐	☐	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐	☐

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.

As discussed in Section E.15, Biological Resources, with implementation of Mitigation Measure M-BI-1, the proposed project would not 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, or reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section E.4, Cultural Resources, implementation of the proposed project would not result in a substantial adverse change in the significance of an archeological resource, or a tribal cultural resource and would not disturb human remains, with implementation of Mitigation Measures M-CR-2 and M-TC-1. Potential impacts to historic architectural resources are potentially significant and evaluated in the EIR. With the exception of this potential impact, the proposed project (with implementation of mitigation measures identified in this initial study) would not result in the elimination of important examples of major periods of California history or prehistory.

As discussed in Section D.8, Air Quality, impacts related to construction-period air pollutant emissions and potential adverse health effects to people living in the area are potentially significant and evaluated in the EIR.

With the exception of the topics of cultural (historic) resources and construction-period air quality, as discussed in Section E, Evaluation of Environmental Effects, the proposed project would not make a considerable contribution to any other cumulative environmental impacts. The EIR addresses these respective impacts in Sections 3.B Historic Resources and 3.C Air Quality in the EIR.

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

Lisa Gibson
Environmental Review Officer
for
Rich Hillis
Director of Planning

DATE August 28, 2024

G. INITIAL STUDY PREPARERS

San Francisco Planning Department, City and County of San Francisco (Lead Agency)

Environmental Planning Division
49 S. Van Ness Avenue, Suite 1400
San Francisco, CA 94103

Environmental Review Officer: Lisa Gibson
Deputy Environmental Review Officer: Devyani Jain
Principal Environmental Planner: Joy Navarrete
CEQA Cultural Resource Team Manager: Allison Vanderslice
Senior Environmental Planner: Megan Calpin
Senior Preservation Planner: Justin Greving

Environmental Consultants

LSA Associates, Inc.
157 Park Place
Pt. Richmond, CA 94801

Principal in Charge and Project Manager: Theresa Wallace
Associate, Director of Air Quality: Jessica Coria
Associate, Air Quality: Cara Cunningham
Principal, Noise: JT Stephens

Historic Preservation Consultants

Page and Turnbull
170 Maiden Lane, 5th Floor
San Francisco, CA 94108

Principal: Carolyn Kiernat

Project Sponsor Team

Heritage on the Marina
3400 Laguna Street
San Francisco, CA 94123

CEO: Mary Linde

Rockwood Pacific Inc.
36 Southwood Drive
Orinda, CA 94563

Frank Rockwood

Perkins Coie, LLP
505 Howard Street, Suite 1000
San Francisco, CA 94105

Project Attorney: Alan Murphy
Project Attorney: Julie Jones

GBA Inc.
210 Noe Street
San Francisco, CA 94114

Eric Jacobs

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APPENDIX C
HISTORIC RESOURCES ANALYSIS AND SUPPORTING INFORMATION

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SUB-APPENDIX C.1
3400 LAGUNA STREET HISTORIC RESOURCE EVALUATION

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PAGE&TURNBULL

3400 LAGUNA STREET
HISTORIC RESOURCE EVALUATION, PART 1

SAN FRANCISCO, CA
[21286]

PREPARED FOR THE SAN FRANCISCO PLANNING DEPARTMENT
February 16, 2023

REVISED



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I. INTRODUCTION

This Historic Resource Evaluation (HRE) has been prepared at the request of Heritage on the Marina for proposed alterations to the structure at 3400 Laguna Street (APN 0417/003) in San Francisco's Marina District. It revises and updates the HRE published on August 28, 2015 by Page & Turnbull. This revised HRE includes an expanded description of the stone cottage on the site, and revises the previous evaluation and character-defining features to include the stone cottage as a contributing element to the significance of the property. Other updates include text revisions replacing the phrase "master architect" with "architect of merit," a revised construction date of 1928-1929 for the stone cottage (previously thought to be 1925) that was uncovered through additional research, updated references, and the addition of building permits issued since 2015.

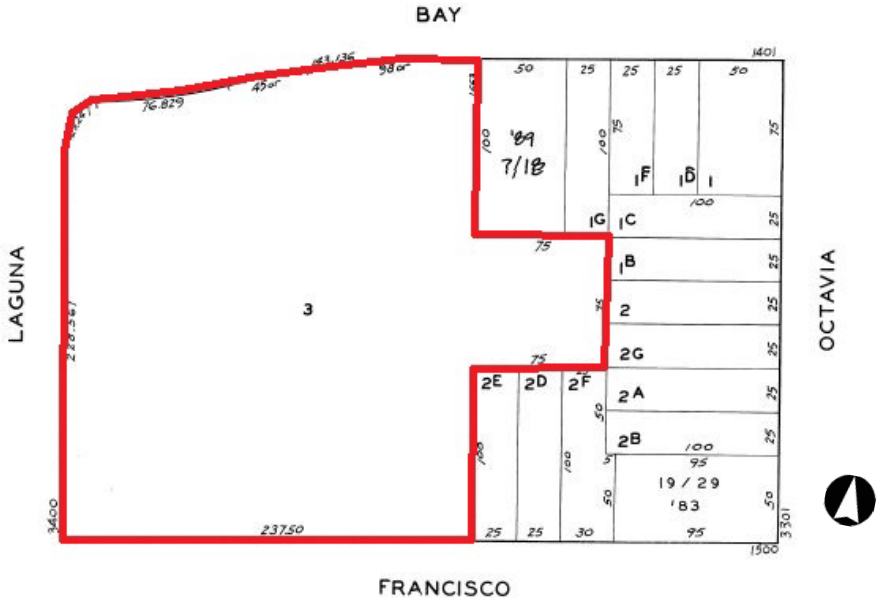


Figure 1: San Francisco Assessor's Map, 3400 Laguna Street marked in red; north is up.
Source: San Francisco Property Information Map, edited by author

The 3400 Laguna Street parcel consists of over half of a city block and is located on a generally square and level lot bounded by Bay Street on the north, Laguna Street to the west, and Francisco Street to the south **(Figure 1)**. The Jacobethan Revival-style main building was designed by architect Julia Morgan for the Ladies' Protection and Relief Society and was constructed in 1925. The main building has several large additions constructed in the second half of the twentieth century, including a L-shaped 1957 addition designed by Warren C. Perry and a 1963 addition designed by Gardner A. Dailey. A stone cottage, completed in 1929, is located at the northeast corner of the lot, adjacent to Bay Street. The 1925 main building and its additions remain in use as a private retirement facility in a RM-1 (residential-mixed use low density) zoning district. The main building is

set approximately ten degrees counterclockwise off cardinal direction but will be described using cardinal directions in this report.

3400 Laguna Street is not listed in the National Register of Historic Places (National Register), California Register of Historical Resources (California Register), or local San Francisco historical register. The subject property is not within the boundaries of any recorded historic district.

METHODOLOGY

This report follows the outline provided by the San Francisco Planning Department for Historic Resource Evaluation reports, and provides a building description, historic context, and an examination of the current historic status for the subject building. The report also includes an evaluation of the property's eligibility for listing in the California Register.

Page & Turnbull prepared this report using research collected at various local repositories, including the City and County of San Francisco Office of the Assessor-Recorder, the San Francisco Department of Building Inspection, the San Francisco Planning Department, and the San Francisco Public Library's History Center, as well as various online sources including Ancestry.com, Newspapers.com, and the California Digital Newspaper Collection. Key primary sources consulted and cited in this report include Sanborn Map Company fire insurance company maps, City of San Francisco Building Permit applications, San Francisco city directories, San Francisco Office of the Assessor-Recorder records, and historical newspapers. All photographs in this report were taken by Page & Turnbull in June 2015 unless otherwise noted.

SUMMARY OF FINDINGS

The property at 3400 Laguna Street has been found eligible to the California Register of Historical Places, thus qualifying as a historic resource for the purposes of review under the California Environmental Quality Act (CEQA). 3400 Laguna Street is eligible for the California Register under Criterion 1 and Criterion 3. Under Criterion 1, the property is significant for its association with the Ladies' Protection and Relief Society, one of the longest running eldercare service organizations in San Francisco. The property is additionally eligible under Criterion 3 as an excellent example of institutional architecture as designed by prominent California architect Julia Morgan, and expanded through early alterations prior to 1957 that were compatible with the English-inspired design of the property. Contributing elements of the property that support its significance include the main building, the stone cottage, and the landscape features of the front lawn. The period of significance for both criteria is 1925 to 1957, beginning with the development of the property and construction of the main building, and ending with the merger between the Ladies' Protection and Relief Society merged with another eldercare institution..

II. EXISTING HISTORIC STATUS

The following section examines the national, state, and local historic status currently assigned to the property at 3400 Laguna Street.

National Register of Historic Places

The National Register of Historic Places (National Register) is the nation's most comprehensive inventory of historic resources. The National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

3400 Laguna Street is not currently listed in the National Register of Historic Places.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.

3400 Laguna Street is not currently listed in the California Register of Historical Resources.

California Historical Resource Status Codes

Properties listed or under review by the State of California Office of Historic Preservation are listed within the Built Environment Resource Directory (BERD) and are assigned a California Historical Resource Status Code (Status Code) of "1" to "7" to establish their historical significance in relation to the National Register of Historic Places (National Register) or California Register of Historical Resources (California Register).[1] Properties with a Status Code of "1" or "2" are either eligible for listing in the California Register or the National Register, or are already listed in one or both of the registers. Properties assigned Status Codes of "3" or "4" appear to be eligible for listing in either register, but normally require more research to support this rating. Properties assigned a Status Code of "5" have typically been determined to be locally significant or to have contextual

[1] California State Office of Historic Preservation, Built Environment Resource Directory (BERD), San Francisco County, updated September 2022.

importance. Properties with a Status Code of "6" are not eligible for listing in either register. Finally, a Status Code of "7" means that the resource has not been evaluated or needs reevaluation.

As of the last update, in September 2022, 3400 Laguna Street was not listed in the California Historic Resources Information System (CHRIS) database with any status code.

San Francisco City Landmarks

San Francisco City Landmarks are buildings, properties, structures, sites, districts, and objects of "special character or special historical, architectural or aesthetic interest or value and are an important part of the City's historical and architectural heritage."[2] Adopted in 1967 as Article 10 of the City Planning Code, the San Francisco City Landmark program protects listed buildings from inappropriate alterations and demolitions through review by the San Francisco Landmarks Preservation Advisory Board. These properties are important to the city's history, provide significant and unique examples of the past that are irreplaceable, and help to enhance the educational and cultural dimension of the city.

3400 Laguna Street is not currently designated as a San Francisco City Landmark or Structure of Merit. Furthermore, 3400 Laguna Street does not fall within the boundaries of any locally designated historic districts or conservation districts, and does not appear to have been included in any local historic resource surveys.

1976 Department of City Planning Architectural Quality Survey

The 1976 Department of City Planning Architectural Quality Survey (1976 DCP Survey) is what is referred to in preservation parlance as a "reconnaissance" or "windshield" survey. The survey looked at the entire City and County of San Francisco to identify and rate architecturally significant buildings and structures on a scale of "-2" (detrimental) to "+5" (extraordinary). No research was performed and the potential historical significance of a resource was not considered when a rating was assigned. Buildings rated "3" or higher in the survey represent approximately the top two percent of San Francisco's building stock in terms of architectural significance. However, it should be noted here that the 1976 DCP Survey has come under increasing scrutiny over the past decade due to the fact that it has not been updated in over twenty-five years. As a result, the 1976 DCP Survey has not been officially recognized by the San Francisco Planning Department as a valid local register of historic resources for the purposes of the California Environmental Quality Act (CEQA).

3400 Laguna Street is not listed in the 1976 DCP Survey.

[2] San Francisco Planning Department, *Preservation Bulletin No. 9 – Landmarks*. (San Francisco, CA: January 2003).

III. BUILDING AND PROPERTY DESCRIPTION

The property contains a building complex composed of three connected buildings, a freestanding stone cottage, and three landscape areas **(Figure 2)**. The original 1925 Julia Morgan-designed main building is labeled "1" in Figure 2. A large, L-shaped addition designed by Warren C. Perry in 1957 is labeled "2," and the 1963 addition designed by Gardner A. Dailey is labeled "3." Two small additions to the Dailey addition were designed by Spencer & Associates and completed in 1986 (not labeled in Figure 2). The freestanding stone cottage is labeled "4." The three landscape areas are the front lawn (labeled "5"), the center courtyard (labeled "6"), and the rear courtyard (labeled "7"). The property is surrounded at the north and west by open recreation fields, and to the east and south by multi-unit residential buildings.



Figure 2: Site map of the 3400 Laguna Street property showing buildings and landscape features labeled. Source: Google Earth, 2023. Edited by Page & Turnbull.

The property description that follows first describes the main building and its publicly accessible interiors, then the 1957 and 1963 additions, followed by the stone cottage, and then descriptions of the grounds and the surrounding neighborhood.

MAIN BUILDING

The main building has a U-shaped footprint, with a longer north-south portion and two wings that extend from the north and south ends of the east façade. The building is two-and-one-half stories over a partially exposed basement level, and has an attic-story penthouse at the east facade. The building is clad in brick with a 5-1 common bond, and has a hipped roof covered in slate shingles **(Figure 3)**.



Figure 3: Main building primary (west) façade, viewed facing east.



Figure 4: Main building, typical window type, in grouping of five.



Figure 5: Main building, typical dormer type.

The building's typical window type consists of two metal-frame multi-light fixed, casement or awning windows, positioned one over the other, set within a terra cotta tile surround and dividing rail, often

topped with a segmental arch with inset terra cotta floral motif. These windows are generally paired, but some are single or in multiples **(Figure 4)**. These windows are generally six-over-eight light at the first story and four-over-six light at the second story. The typical dormer type is capped with a hipped roof covered in slate shingles, containing two eight-lite metal-frame fixed or casement windows **(Figure 5)**.

PRIMARY (WEST) FAÇADE

The primary (west) façade of the main building is symmetrically arranged into seven bays and faces west onto the landscaped front yard and Laguna Street beyond. The raised basement includes six pairs of four-light metal frame fixed windows with metal screens, evenly spaced along the façade and largely obscured by foliage.

At the first story, the primary entrance is located at center, accessed by a double curved brick staircase with curved steps, and a brick landing with iron railings **(Figure 6)**. The primary entrance is a double arched opening, with a terra cotta tile surround with three engaged Corinthian terra cotta columns. The openings historically were open and led to a recessed vestibule; they are currently infilled with contemporary anodized aluminum framing; the left has a large pane of reflective glass with a three-lite transom and the right has a fully glazed door with sidelights and the same transom. Within the now-enclosed vestibule, the building's original entrance includes two paired eight-lite wood paneled doors under paired four-light wood casement windows, all set within a terra cotta surround **(Figure 7)**.



Figure 6: Primary entrance, west facade, viewed facing east.



Figure 7: Primary original entrance, viewed from within the building, viewed facing northwest.



Figure 8: Center bay of primary facade, second and third stories, viewed facing southeast.



Figure 9: Underside of center bay second story canted bay, viewed facing east.

At the second story, the center bay includes a projecting, canted oriel bay with three typical windows at center and one at each side face. The canted bay has a belt course along the window sills, and two rectangular decorative terra cotta panels centered above and below the center window **(Figure 8)**. On the underside of the oriel bay is a terra cotta entablature, featuring shield and ribbon crests

alternated with scrolled brackets **(Figure 9)**. At the third story, the center bay includes a large brick-clad pediment dormer with five eight-light metal-frame fixed or casement windows **(refer to Figure 8)**. This dormer terminates in a gabled parapet with flared ends and a shaped terra cotta tile coping, with a floral finial at the gable peak.

The first, third, fifth and seventh bays (numbering left to right) include paired typical windows at the first and second stories. The second and sixth bays have a canted bay at the first story, with three typical windows at the front face and two typical windows at the side faces, with a belt course along the lower sills and a terra cotta cornice panel and molded cornice. At the second story these bays have two pairs of typical windows, each pair separated by a relief tile panel with a floral motif. These bays are flanked by downspouts topped by sculpted basket rain catchers.

The second story terminates with a continuous terra cotta belt course above the second story windows and a terra cotta frieze with floral buttons, above which a shaped cornice conceals the gutter. At the roof are six evenly spaced typical dormers, flanking the central parapet dormer. Two brick chimneys near the roof peak are capped by terra cotta tile.

NORTH FAÇADE

The north façade of the main building is organized into five bays and faces onto a paved surface parking area and Bay Street beyond **(Figure 10)**. The east end of the façade, containing one bay, projects forward and is surrounded at the first story by the roof covering a contemporary service entrance. The façade abuts the 1957 addition at the far left (east). The raised basement includes two window openings, two metal service doors, and an open-air metal elevator mechanism **(Figure 11)**.



Figure 10: North façade of the main building, viewed facing south.

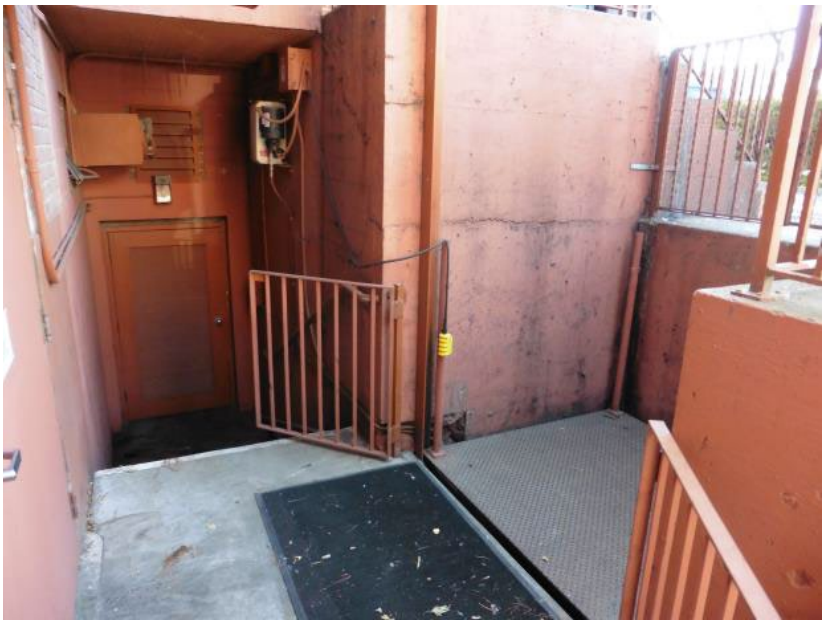


Figure 11: Exposed basement showing the elevator mechanism, viewed facing northwest.

The first bay (counting left to right) includes paired typical windows at the first and second story, and a downspout topped by a sculpted basket rain catcher at far left. The second and third bays include paired variations on the typical window type at the first story (lacking the terra cotta meeting rail)

and paired typical windows at the second story. There is a small anodized aluminum double hung window at the second story, right of the third bay. The fourth bay includes a partially glazed metal door with a transom window at the first story, and paired typical windows at the second story. The first story door has new mortar around the frame, and is accessed via a concrete stair and a concrete loading dock that continues to the right and surrounds the north and east sides of the fifth bay. The loading dock is sheltered by a corrugated metal roof supported by simple posts. The two-story projection has paired typical windows at all three sides of the first story, three typical windows at the east and west sides of the second story, and five typical windows at the north side of the second story **(Figure 12)**. The sixth bay includes paired typical windows at the first and second story.



Figure 12: West portion of north facade, viewed facing southeast.

The north façade is capped by the same belt course above the second story windows, and terra cotta frieze with floral buttons, above which a shaped cornice conceals the gutter. At the roof are four typical dormers, three above the second, third, and fourth bays, and one at the projecting fifth bay. A brick chimney capped by terra cotta tile is located at the roof.

EAST (REAR) FAÇADE

The east façade of the main building faces onto a landscaped courtyard and the later additions to the building beyond. The façade expresses the "U" of the building's footprint; the south (left) and north (right) wings project to the east from the central section of the building. The north wing intersects with and is covered by the 1957 addition. The east face of the south wing is configured into three bays **(Figure 13)**. The first and third bays have paired typical windows at the first and second story. The second bay, at center, is offset and expresses an interior stairwell: it consists of a half-glazed wood-paneled door surrounded by a brick Tudor arch at the first story, and typical paired windows located between the first and second stories. The façade terminates in the same belt course, cornice and gutter as the rest of the building, above which there is a single centered atypical dormer, containing three rather than two typical windows.



Figure 13: Left (south) projection of the east façade, viewed facing west

The north face of the south wing is organized in three bays **(Figure 14 and Figure 15)**. The first and third bays have typical windows at first and second stories, with an additional slim eight-lite metal frame casement window at the far right of the first story of the third bay. The center bay has no window openings. The façade terminates in the same belt course, cornice and gutter as the rest of

the building, above which are typical dormers at the second and third bays, with an additional atypical dormer at far right: this dormer is recessed and not visible from ground level, has a metal framed 12-lite window and a shed roof clad in composite shingles.

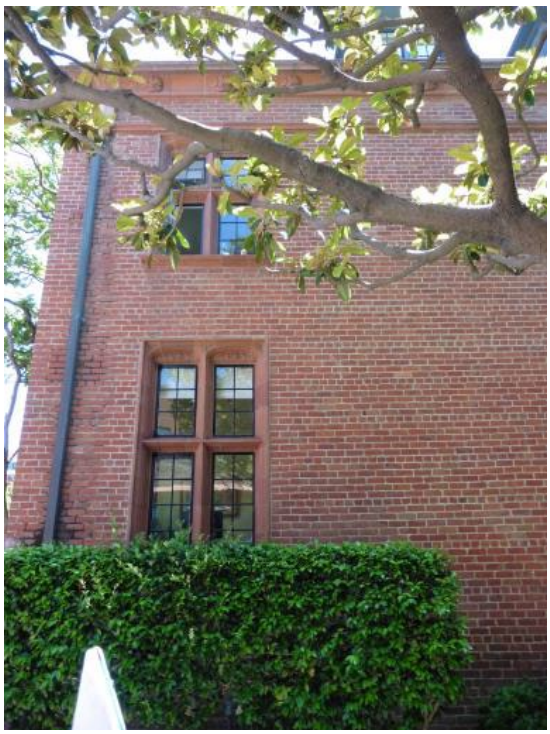


Figure 14: Left (east) portion of the north face of the south projection, viewed facing south.



Figure 15: Right (west) portion of the north face of the south projection, viewed facing south.

The central, recessed portion of the east façade is organized into five bays, with the fifth bay (at far right) covered at the first story by the end of the 1957 addition **(Figure 16)**. The first and fourth bays (counting left to right) include paired four-light metal-frame windows at the exposed basement, and typical windows at the first and second story. Fenestration at the second bay is offset and expresses an interior stairwell. A wood-paneled door with an eight-lite casement window, sandstone surround, broken top rail, topped with a segmental arch with inset terra cotta floral motif is located at the first story, accessed via a curved brick stair with iron rails. There is a typical paired window at the second story. The third bay includes a two-story projecting canted bay, with paired four-lite metal-frame windows at the exposed basement, and three typical windows at center and two typical windows at each side face of the first and second stories. The fifth bay, at far right, is covered by the 1957 addition and includes a typical window at the second story. The façade includes four downspouts topped by sculpted basket rain catchers, two at right and two at left.



Figure 16: East (central) portion of east façade, viewed facing northwest.

The façade terminates with the same belt course, cornice and gutter as the rest of the building, above which are several atypical dormers and a fourth-story penthouse **(Figure 17)**. Atypical dormers include a shed-roof dormer clad in composite shingles with a metal framed 12-lite window at left, aligned with the first bay; a hipped-roof continuous dormer clad in slate shingles with three groups of three eight-light metal frame windows, which spans the width of the three center bays and the penthouse above it; and a small, recessed shed-roof dormer at far right with an aluminum sash sliding window and a skylight. At the central fourth-story penthouse, two slate-clad towers with flat roofs flank a continuous band of metal frame eight-light casement windows, underneath a shed roof. Each tower includes a large, centered flower medallion and terminates with a molded cornice. A metal fire escape is located right of center, leading down to the roof of the canted bay.



Figure 17: Detail of dormers and fourth-story penthouse, viewed facing west.

The south face of the north wing abuts the 1957 addition, which extends at the first story to reach the central portion of the east façade of the main building, thereby covering the first story of the north wing **(Figure 18)**. (The 1957 addition is described in a subsequent section of this report.) The second story includes paired typical windows at left and center, and inset sliding glass doors at right, which provide access to an open-air terrace paved with ceramic tile and shaded by a contemporary canvas awning. The façade terminates with the same belt course, cornice, and gutter as the rest of the building, above which is a typical dormer right of center and an atypical dormer including an aluminum vent instead of windows at left: this dormer also has a flat-roof addition at left. Although not visible from ground level, a typical dormer is located at the east-facing portion of the projection roof, above the 1957 addition.



Figure 18: South face of north projection, viewed facing northwest.

SOUTH FAÇADE

The south façade of the main building is organized into six bays and faces directly onto a paved area and the 1963 addition beyond. Similar to the north façade, the south façade is organized into six bays. The first bay, counting from left to right, includes paired typical windows at the first and second story **(Figure 19)**. The second bay is a large two-story projecting wing, with triple typical windows at the first and second stories of the west face, five typical windows at the first and second stories of the south face, and paired 10-lite wood doors under four-light transoms at the first story of the east face, with triple typical windows at the second story **(Figure 20)**. The entry doors are sheltered by a non-historic canvas awning and accessed via a concrete stair and concrete landing with iron railing. There is a typical downspout at the left of this east face of this wing.



Figure 19: South façade, viewed facing northeast.



Figure 20: South façade, viewed facing northwest.

The third and fourth bays at the south façade include paired typical windows at the first and second stories, but the glass at the first story windows is leaded stained glass, expressing an interior chapel **(Figure 21)**. Between the second story windows at the third and fourth bays there is a tall narrow blind niche. The fifth bay includes no fenestration but has decorative brick treatments, square at the first story and diamond at the second story. The sixth bay includes paired typical windows at the first and second stories. The façade includes a raised water table at the left and a typical downspout at the far right. The façade terminates with the same belt course, cornice, and gutter as the rest of the building, above which are typical dormers at the second, third, fourth and fifth bays.



Figure 21: South façade, viewed facing north.

PUBLICLY ACCESSIBLE INTERIOR SPACES OF THE MAIN BUILDING

3400 Laguna Street is a private retirement facility, and most spaces are accessible only to residents and staff. Publicly accessible interior spaces are located close to the primary entrance at the first story of the 1925 main building. Finishes are largely original and include glazed ceramic tile floors, smooth stucco walls, plastered beam or wood coffered ceilings, dropped-arch openings, wood trims and built-in shelving in the library, and carved stone fireplace surrounds and mantles with floral motifs **(Figure 22 to Figure 24)**. Bannisters at stairwells to upper floors include carved wood supports, and doors to private wings at the first story are multi-lite wood.



Figure 22: Lobby and reception area, viewed facing south.



Figure 23: Sitting room, viewed facing northeast.



Figure 24: Library and reading room, viewed facing south.

1957 ADDITION

The 1957 addition has an L-shaped footprint; the addition's primary four-story volume runs north-south to the east of the main building, with a shorter two-story wing running east-west to connect to the wing that projects east from the north end of the main building's east façade. The two portions of the 1957 addition are described separately below.

PRIMARY VOLUME

The primary volume of the 1957 addition is four stories over a partially raised basement. This portion of the building has a rectangular footprint with projecting rectangular stair towers at the north and south facades. This portion of the building is clad in board-formed concrete, capped with a flat roof, and intersects with the 1963 addition at its southwest corner. All windows at this portion of the building are anodized aluminum unless described otherwise.



Figure 25: Primary volume of the 1957 addition, north façade, viewed facing southeast.

The north façade faces onto a paved areaway, the stone cottage, and Bay Street beyond, and is organized into three bays **(Figure 25)**. The central bay contains a projecting stair tower. The basement level is fully exposed at this façade by a paved area. At the basement, the first bay

(counting from left to right) includes a double hung window with frosted glass, a vented opening, and a two-part fixed and casement window; the second (central) bay includes a half-glazed metal door; and the third bay includes a two-part fixed and casement window. At the first story, the first and third bays include fixed and casement windows under transoms, while the second bay includes a half-glazed metal entry door. At the second through fourth stories, all bays include two-part fixed and casement or sliding windows. The second bay windows are offset, expressing the interior stairwell, and the central-bay tower rises above the roofline, allowing roof access at its south side. The north façade terminates with a concrete coping.

The east façade faces onto the rear courtyard at center and adjacent residential buildings at the north and south, and is organized into fifteen bays **(Figure 26 and Figure 27)**. Fenestration includes small double hung windows, large two-part fixed and casement windows, and two-part fixed and casement windows under transom windows, which are generally evenly distributed along all bays, except the first and fifteenth bays (counting from left to right), which include no fenestration. At the tenth bay, a first-story fully glazed aluminum door with awning transom provides access to the rear courtyard. Directly left of the door are two large fixed windows under transoms. The east façade terminates with a concrete coping.

The south façade intersects with the 1963 addition and faces onto a paved driveway and Francisco Street beyond. The façade is organized into three bays, with a projection constituting the first and second bays (counting left to right) **(Figure 28)**. At the first story, the first and second bays intersect with and are covered by the 1963 addition, and the third bay includes a large six-light metal sash window. At the upper stories, the first bay has no fenestration; the second bay includes punched balconies with openings (doors and windows, largely not visible from the street) along the south and east facades, and the third bay includes large two-part fixed and casement windows. The façade terminates in concrete coping.

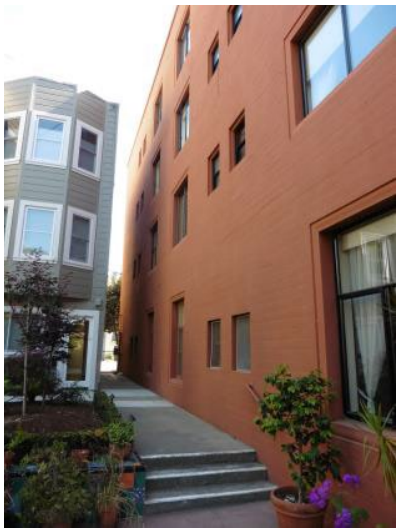


Figure 26: East façade, facing southwest.



Figure 27: East façade, viewed facing northwest



Figure 28: South façade, viewed facing north.

The west façade of the 1957 addition faces onto the central courtyard and the main building beyond **(Figure 29)**. The façade intersects with both the east-west wing of the 1957 addition at left (north), and the 1963 addition at right (south). The façade is organized into 15 bays, and window types include two-part fixed and casement windows (some with transoms), small double hung windows, and three-part fixed and sliding windows. At the first bay (counting left to right), the basement is fully exposed due to an areaway, and includes a two-part fixed and casement window and a small double hung window. The intersecting northwest wing covers second, third and fourth bays at the

first and second bays. The 1963 addition intersects at the first story of the twelfth through fifteenth bays. The remainder of the façade includes evenly spaced windows. At the seventh and tenth bays, above the first story windows are raised rectangular embellishments, each with a brick diamond detail, mirroring the embellishment at the south façade of the northwest wing (refer to **Figure 32**). The façade terminates with a concrete coping, above which is an elevator penthouse at the roof aligned with the fourth bay.



Figure 29: West façade, viewed facing east.

NORTHWEST WING

The northwest wing of the 1957 addition is two stories over a partially raised basement. This portion of the building has a rectangular footprint, is clad largely in concrete with some brick-clad areas, and has a flat roof. The west end of this wing intersects with the main building, and the east end intersects with the west façade of the 1957 addition's primary volume, and therefore the wing includes only north and south facades.

The north façade is clad in concrete and faces onto a paved parking area and Bay Street beyond **(Figure 30)**. The basement at this façade is exposed via an areaway and includes four evenly spaced sets of three-light anodized aluminum siding windows covered with metal fencing, and a set of double metal doors with vents and a half-glazed metal door at far left, fully below grade and accessed via a straight concrete stair. The first story includes five evenly spaced sets of four awning-over-casement anodized aluminum clad wood windows, set within a recessed plane **(Figure 31)**. The second story is cantilevered over the first story approximately three feet and includes two pairs of anodized-aluminum frame sliding windows, alternated with two pairs of small anodized aluminum

double hung windows, with a tripartite anodized aluminum fixed and sliding window at far left. The north façade terminates with a slim concrete coping.



Figure 30: 1957 Addition, east-west wing, north façade.



Figure 31: North façade, window detail.

The south façade, facing onto the central courtyard and the 1963 addition beyond, is clad in brick at the exposed basement and first story, and in concrete at the second story **(Figure 32)**. The exposed basement and first story of this façade extend west to the center portion of the main building, covering the first floor of the north wing; the second story extends only to the terminus of the north wing. The exposed basement includes eleven evenly spaced anodized aluminum sliding windows, each with a tilted brick sill and a tinted concrete lintel. At the first story is a continuous band of 13 tripartite anodized aluminum-clad wood awning-over-casement window groups, framed in a slightly

recessed wood colonnade and separated by slender Corinthian columns **(Figure 33)**. At far right, a fully glazed metal door is set within the arcade, framed by sidelights and a transom and accessed via a straight concrete ramp with metal pipe rails. Above the arcade is a parapet featuring five evenly spaced decorative brick diamond medallions. The second story is recessed approximately six feet from the first story and is clad in board-formed concrete. Fenestration includes evenly spaced small anodized aluminum double hung windows and larger two pane and tripartite sliding windows. This façade terminates in concrete coping.



Figure 32: South facade showing courtyard, viewed facing northwest



Figure 33: South façade second-story window detail, viewed facing north

1963 ADDITION

The 1963 addition is oriented parallel to the south edge of the lot and has a generally rectangular footprint, set on an east-west axis. The building is one story, clad in textured concrete and capped largely with a flat roof, although two sections of the building have pitched roofs. The 1963 addition intersects with the 1957 addition at its northeast corner. The typical window type consists of an anodized aluminum two part fixed and casement under transom, with slightly inset surrounds.

The east façade faces onto a concrete ramp and concrete drive, and a multi-unit residential building beyond. At center is a fully glazed metal door with a large fixed steel sidelight, sheltered by a canvas awning and accessed via a concrete ramp with metal rail **(Figure 34)**. At right is a four-lite steel-frame window. Both the door and window are set in recessed portions of the façade that are clad in ceramic tile. This façade terminates with a band of slightly recessed concrete, and a projecting roof with paneled concrete eaves.



Figure 34: East facade of the 1963 addition, viewed facing northwest.



Figure 35: South façade, viewed facing west.

The south façade faces on to a very narrow yard with a thick hedge, and Francisco Street beyond. The façade includes a water table marked by a recessed band in the façade, and is organized into five bays. The first four bays (counting left to right) each include two typical windows, and the fifth bay includes a projecting rectangular panel with one typical window set within it, topped by a projecting band **(Figure 35)**. The façade terminates in a band of recessed concrete, and a projecting roof with paneled concrete eaves.

The west facade faces onto an enclosed yard and Laguna Street beyond, and is organized into three bays. The first and third bays (counting left to right) have the typical water table, recessed cornice, and eave treatment as the other portion of the building, and no fenestration **(Figure 36)**. The second bay is a large brick clad projection capped with a slate-shingled front gable roof. This projection is part of alterations that were designed by Spencer & Associates and completed in 1986 **(Figure 37)**. The projection includes a canted bay window at its west side, with a fixed six-lite anodized aluminum frame window at its front face and fixed four-lite anodized aluminum frame windows at the side faces. The canted bay is clad in ceramic tile, as is the cornice at all three sides of the projection. The west wall of the projection extends beyond the perimeter of the rest of the projection, and the façade here terminates with a front gable parapet. The projection includes an entrance (not visible from the street) at its south side, set within a deep recess and accessed via an L-plan wood ramp with wood rails.



Figure 36: West façade, viewed facing southeast.



Figure 37: West façade, viewed facing northeast.

The north façade of the 1963 addition faces onto a concrete ramp and the main building and the central courtyard beyond. The façade is organized into six bays. The first three bays (counting left to right) are covered by a large projection with a rectangular footprint that intersects with the 1957 addition at the east. This projection is part of the 1986 Spencer & Associates alterations and has a similar treatment as the projection at the west façade, with brick cladding and a hipped roof with an east-west roofline and slate shingle cladding **(Figure 38)**. This projection includes paired fully glazed anodized aluminum leaf doors in the first and third bays, surrounded by glazed ceramic tile, and a three-sided glass bay with a pyramidal glass roof at center, below a gabled parapet. The west-facing portion of this projection includes paired fully glazed anodized aluminum leaf doors at left and right, and a projecting chimney stack at center **(Figure 39)**. The remaining three bays at the north façade

include typical windows, and the façade terminates with a band of recessed concrete, and a projecting roof with paneled concrete eaves **(Figure 40)**.



Figure 38: North façade, projection and courtyard, viewed facing southeast.



Figure 39: West façade of projection at the north façade, with 1957 addition visible beyond, viewed facing east.



Figure 40: North façade, viewed facing southeast.

COTTAGE

A one-story stone cottage is located at the northeast corner of the property, enclosed within a wood fence and gate. It is a one-story residence with an 'L' plan; its exterior walls are constructed of coursed, roughly dressed ashlar stone and appear to have been repointed with Portland cement. The building's steeply pitched hipped roof is covered in asbestos shingles and features two copper vents, one on the east slope and one on the south slope. The exterior walls terminate in copper gutters and broad wood plates. A tapering, stucco-clad chimney adjoins the north façade and rises approximately five feet above the eave.

The primary façade faces south **(Figure 41)**. The right (east) portion of the façade is the building's ell, projecting forward approximately six feet, and contains two wood-frame paired casements. The left (west) portion of the façade features a centered four-lite wood Dutch door, flanked by paired wood-frame casement windows. The door is accessed by a walkway of concrete pavers.



Figure 41: Primary (south) façade, view facing north. Photograph taken in March 2022.

The west façade features a projecting, flat-roofed glazed boxed bay with stucco-clad base **(Figure 42)**. The wood-framed windows are arranged with 24 lites on the west face and eight lites on each side face. The boxed bay terminates in a simple molded wood cornice with metal coping.



Figure 42: Oblique view of west and south façades, viewed facing northeast. Photograph taken in March 2022.

The north façade features the large stucco clad chimney, located west of center. A vinyl-sash casement window is located between the chimney and the west end of the façade **(Figure 43)**. Between the chimney and the window near the eave is an area that appears to have been infilled with non-original stones. The only feature at the east façade is a wood-frame casement window with an exposed wood lintel near the north end of the façade **(Figure 44)**.



Figure 43: West half of north façade, viewed facing southeast. Photograph taken in March 2022.



Figure 44: East façade, viewed facing northwest. Photograph taken in March 2022.

GROUNDS

The grounds of the property can be separated into three discrete landscaped areas: a front yard that faces on to Laguna Street, extending between Francisco Street and Bay Street; a central courtyard that is surrounded by the main building and its additions; and a rear courtyard that is located behind (east of) the 1957 addition's primary volume and faces adjacent multi-family residential buildings. These landscaped areas are labeled 5, 6, and 7, respectively, in **Figure 2**. All of these areas are formally landscaped. A non-historic paved surface parking lot is located north of the main building, filling the area between Bay Street and the north façades of the 1925 main building and the northwest wing of the 1957 addition.

The front yard consists of curvilinear paths, shaped shrubs, hedges, lawns, and small trees, with larger trees at the far north edge of the property along Bay Street **(Figure 45).** The yard is symmetrically arranged around the primary entrance of the main building; concrete paved paths lead from the bottom of the front entrance steps to two gates at the western edge of the property. A small, enclosed garden is located at the south portion of the front yard and is associated with the 1962 addition. A low, mortared brick base that is topped by an iron fence encircles the front yard. This fence extends along the north and south perimeter of the property as well; the north and south portions of the fence also include a dense hedge.



Figure 45: Front yard, viewed facing north.

The central courtyard includes a large paved brick area, concrete circulation paths (including short sections of stairs), and areas of grass lawn. Two concrete cross-shaped fountains with concave corners are located on axis with the two-story bay window at the east façade of the main building

(Figure 46). Around the paved courtyard are pruned shrubs, small and medium-size mature trees, and various species of flowers. This courtyard extends south to provide access, via paved circulation paths, to the 1963 addition and the doors at the south wing of the main building.



Figure 46: Central courtyard, viewed facing west.



Figure 47: Rear courtyard, viewed facing northeast.

The rear courtyard is located to the east of the 1957 addition and is accessed from the adjacent building by a concrete ramp and set of stairs. An at-grade concrete path leads along the rear façade of the 1956 addition and provides access to the courtyard from the north and south sides of the building. The courtyard includes bushes, a wooden trellis with vines and hyacinths planted along many of the tinted curvilinear concrete walkways pathways, and mature trees **(Figure 47)**.

SURROUNDING NEIGHBORHOOD

3400 Laguna Street is located in a mixed residential and commercial neighborhood. Structures are mainly multi-family residences, constructed largely in the 1920s with some more contemporary infill construction. Some buildings east and south of the subject property include first-story commercial use. The Moscone Recreation Center is directly west of the property across Laguna Street. To the northeast is Fort Mason Park, established in 1972. The surrounding residential blocks do not have

any setbacks and are built abutting their neighbors, with private yards in the center of each block **(Figure 48 to Figure 50)**.



Figure 48: Bay Street, east of subject property, viewed facing southeast.



Figure 49: Ft. Mason Park, north across Bay Street from the subject property, viewed facing northeast.



Figure 50: 1500-1550 Bay Street, contemporary construction northwest of the subject property, viewed facing northwest on Bay Street looking toward intersection with Laguna Street.

IV. HISTORIC CONTEXT

EARLY SAN FRANCISCO HISTORY

Native American communities and their ancestors inhabited the region that would become the San Francisco Bay Area for centuries preceding the arrival of Europeans. European settlement of what is now San Francisco began in 1776 with the simultaneous establishment of the Presidio of San Francisco by representatives of the Spanish Viceroy, and Mission San Francisco de Asís (or Mission Dolores) by members of the Franciscan order of the Catholic Church. The establishment of Mission Dolores, and the twenty other California missions, brought the mission system to the region, which aimed to convert local indigenous peoples to Catholicism, expand the Spanish colonial sphere of influence, and establish a colonial society. While the mission system claimed to be based on the voluntary conversion of neophytes, large numbers of Native Americans were forcibly relocated to support the missions, devastating cultural continuity for many communities, and decimating indigenous populations through exposure to disease.[3]

In 1821, Mexico declared independence from the Spanish colonial government, taking with it the former Spanish colony of Alta California, including the land which would become San Francisco. Along with independence from the Spanish colonial government, Alta California was also subject to the secularization acts passed by the Mexican government that removed the power of the missions and sought to end the mission system, reclaiming mission lands to be redistributed through the rancho system.

During the Mexican period, a small village, whose first permanent resident in 1835 was British seaman William Richardson, was established around a plaza (today called Portsmouth Square) above a cove in San Francisco Bay. This village, which was called Yerba Buena, served as a minor trading center inhabited by a few hundred people of diverse nationalities. In 1839, a few streets were laid out around the plaza by resident Jean Vigot and settlement expanded up the slopes of Nob Hill. Not long after the United States seized California in 1846 and Captain John B. Montgomery planted an American flag at Portsmouth Square (named after Montgomery's ship the *Portsmouth*), an Irish-born surveyor named Jasper O'Farrell extended the original street grid by Vigot, while also laying out Market Street from what is now the Ferry Building to Twin Peaks. Blocks north of the planned Market Street alignment were laid out in small 50-*vara* square blocks, whereas blocks south

[3] Robert Archibald, "Indian Labor at the California Missions," *The Journal of San Diego History,* Spring 1978, v. 24, no. 2, accessed February 10, 2023, https://sandiegohistory.org/journal/1978/april/labor/; Charles Wollenberg, *Golden Gate Metropolis: Perspectives on Bay Area History* (Berkeley, California: Institute of Governmental Studies, University of California, Berkeley, 1985), 44-48.

of Market Street were laid out in larger 100 *vara* blocks.[4] The following year the village of Yerba Buena was renamed San Francisco to take advantage of the name's association with the bay.[5]

The discovery of gold at Sutter's Mill in 1848 brought explosive growth to San Francisco, with thousands of would-be gold-seekers making their way to the isolated trading outpost on the edge of the North American continent. Between 1846 and 1852, the population of San Francisco mushroomed from less than 1,000 people to almost 35,000. The lack of level land for development around Portsmouth Square soon pushed development south to Market Street, eastward onto filled tidal lands, and westward toward Nob Hill. At this time, most buildings in San Francisco were concentrated downtown, and the outlying portions of the peninsula remained unsettled throughout much of the late nineteenth century.[6] San Francisco's waterfront was transformed into a major shipping center for goods en route to the gold mines in the Sierra Nevada Mountains.[7]

The discovery of the Comstock Silver Lode in 1859 also prompted renewed investment in and marvelous profits from mining and real estate through the 1870s for a few wealthy San Franciscans.[8] Construction and real estate values skyrocketed in the city, just as they had following the discovery of gold in 1848.[9] With the decline of gold production in 1855, San Francisco's economy diversified to include agriculture, manufacturing, shipping, construction, and banking.[10] Prospering from these industries, a new elite of merchants, bankers, and industrialists arose to shape the development of the city as the foremost financial, industrial, and shipping center of the West.

THE MARINA DISTRICT

3400 Laguna Street is located within San Francisco's Marina District neighborhood. The boundaries of the Marina are roughly defined by the San Francisco Bay to the north, Van Ness Avenue and Fort Mason to the east, Lombard Street to the south, and the Presidio of San Francisco to the west.

As shown on the U.S. Coast Survey map, most of what is today the Marina District was historically submerged beneath San Francisco Bay **(Figure 51)**. During the first decades of the City's history, the eastern part of the Marina District consisted of an enormous sand dune bounded approximately by Black Point (today's Fort Mason) on the north, Leavenworth Street on the east, Fillmore Street on the

[4] A *vara* is is an antiquated Spanish unit of measurement.
[5] Rand Richards, *Historic Walks in San Francisco: 18 Trails Through the City's Past,* (San Francisco: Heritage House Publishers, 2002), xii-xiii.
[6] Rand Richards, *Historic San Francisco. A Concise History and Guide,* (San Francisco: Heritage House Publishers, 2001), 77.
[7] Susan Dinkelspiel Cerny, *An Architectural Guidebook to the City: San Francisco and the Bay Area,* (Salt Lake City: Gibbs Smith, 2007), 1.
[8] Gray Brechin, *Imperial San Francisco: Urban Power, Earthly Ruin,* (Berkeley: University of California Press, 1999).
[9] Cerny, *An Architectural Guidebook to the City: San Francisco and the Bay Area,* 3.
[10] Rand Richards, *Historic San Francisco. A Concise History and Guide*, 77.

west, and Lombard Street on the south. Several lagunas, or lakes, are also shown south of Lombard Street. The largest of these was known as "Washerwoman's Lagoon" as it was the site of numerous laundry facilities, as well as other industries requiring large amounts of fresh water **(Figure 52)**. What is today the heart of the Marina District was a shallow tideland with a "rural landscape of mud flats, shanties, pastures, and small farms."[11] The primary routes through the area were the Presidio Road, developed during the 1840s, and the Bay Shore & Fort Point Road, a toll road developed in 1864 which ran from North Beach to the Presidio.[12]

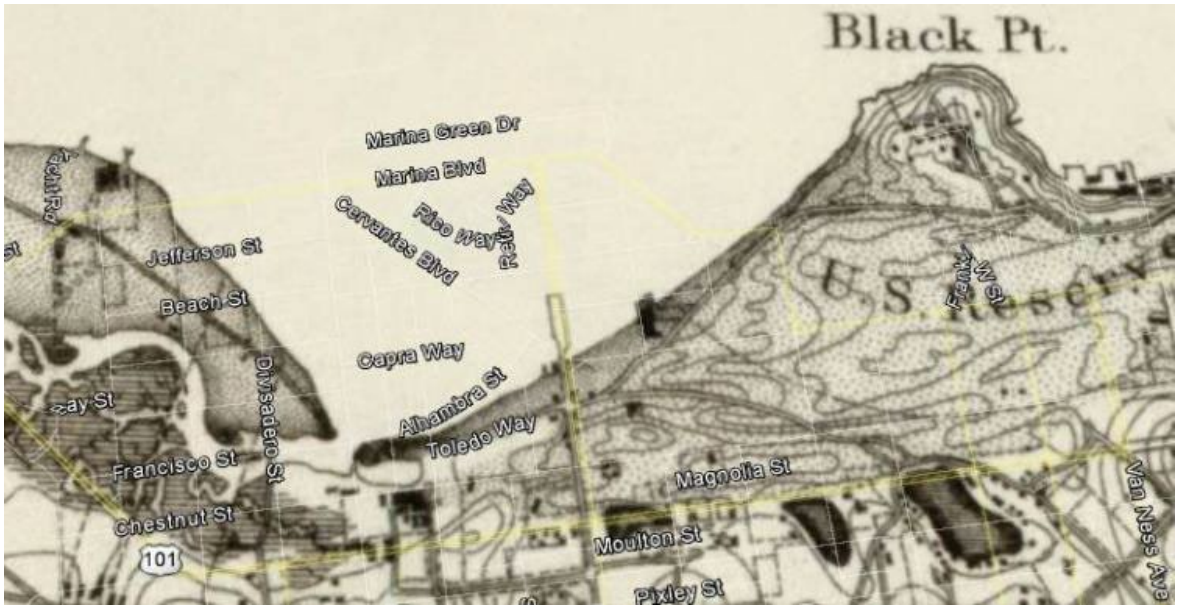


Figure 51: Overlay of current street grid onto the 1869 Coast Survey map on current street grid. Source: David Rumsey Map Collection

[11] Christopher VerPlanck, "From Mud Flats to Marina: Building a San Francisco Neighborhood," *Heritage News* 35 (Summer 2007), 5.
[12] Robert Bardell, "The Presidio Road," *The Argonaut*, Vol. 23, No.2, Winter 2012, 4-11.



Figure 52: View of the Marina District, circa 1860, viewed facing west, with Washerwoman's Lagoon in the mid-ground Source: Carleton E. Watkins Collection, Bancroft Library, University of California, Berkeley

To the east was Fort Mason, a military reservation created in 1850 at Black Point, a prominent outcropping of rock. Fort Mason was not fortified, however, until 1863 during the Civil War. Immediately southwest of Fort Mason was Lobos Square, bounded by Chestnut, Laguna, Webster and Bay streets. The Square was reserved in 1855 by the San Francisco Board of Supervisors but remained vacant throughout the nineteenth century. As discussed in Randolph Delehanty's study of San Francisco parks: "It was the only true bayside reservation and fronted on the tidal marshes near what became Gashouse Cove and the Fulton Iron Works. Nothing was done to improve the site until the filling in of the marshes for the gigantic Panama-Pacific International Exposition of 1915."[13]

The "Gashouse Cove" [Gas House Cove] mentioned by Delehanty referenced the gas works constructed by the San Francisco Gas Light Company in the late 1800s. In particular, a massive gas storage tank was constructed at the northwest corner of Bay and Laguna streets (visible in a 1938 aerial photograph included as **Figure 54**). In addition to the gas and iron works, other industrial plants located in the area included the California Pressed Brick Company, the Pacific Ammonia Chemical Company, and a soap and tallow works.[14]

[13] Randolph Stephen Delehanty, *San Francisco Parks and Playground, 1839 to 1990: The History of Public Good in One North American City (Volumes I and II)*, Harvard University Thesis, 1992, 82-83.
[14] VerPlanck, "From Mud Flats to Marina," 6.

After the 1906 earthquake and subsequent fire, two refugee camps were established in the area. By 1910, San Francisco merchants raised over four million dollars to acquire the Harbor View area for the site of a world's fair. Suction dredges were used to pump sand and mud from San Francisco Bay to fill the remaining area behind an existing seawall, and existing buildings adjacent to the newly filled land were demolished to make way for construction of the fair buildings.

The Panama-Pacific International Exposition (PPIE) opened in February 1915—celebrating both the completion of the Panama Canal and San Francisco's recovery from the 1906 earthquake. Over 18 million visitors came to the fair over the course of the year, marveling at an astonishing array of "temples" and "palaces" constructed at the site. The future site of 3400 Laguna Street was located within the Amusement and Concession Zone of the fair (visible at right in **Figure 53**).

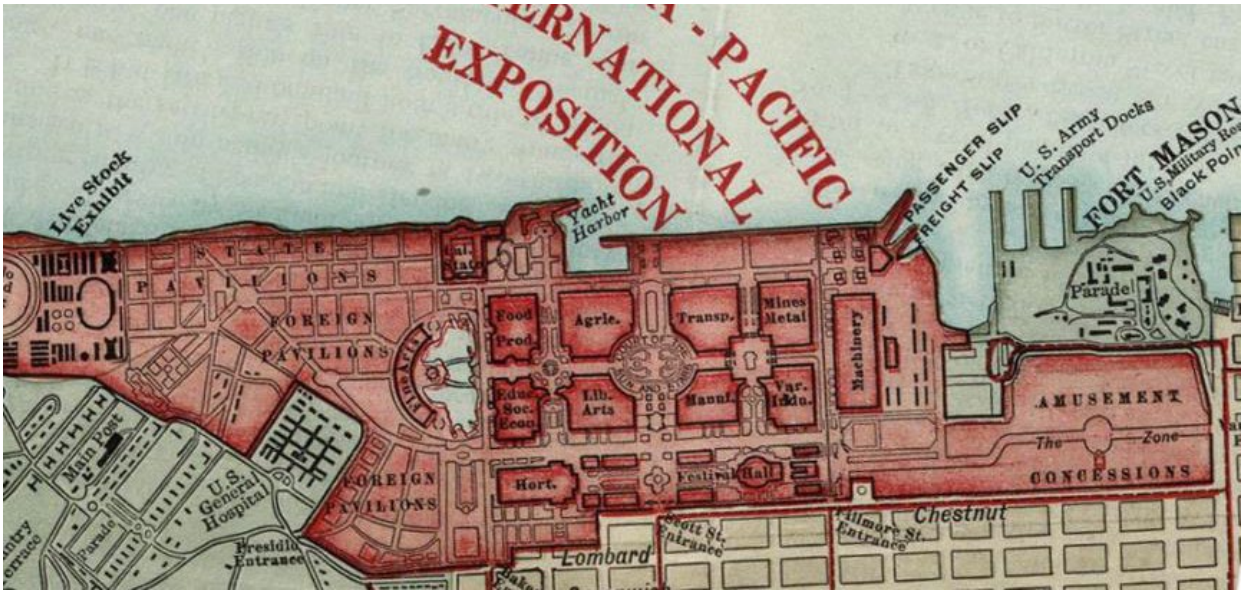


Figure 53: Detail of the 1914 Southern Pacific "Map of San Francisco and Vicinity" showing the layout of the Panama Panama-Pacific International Exhibition. Source: David Rumsey Map Collection

The vast majority of the PPIE buildings were designed to be temporary, and by 1916 the only remaining buildings were the Yacht Harbor, the North Gardens (now Marina Green), the Palace of Fine Arts, and the Column of Progress (no longer extant). The streetcar lines established by the San Francisco Municipal Railway to provide access to the fair also remained in use, making the former PPIE lands extremely attractive for residential development. In 1922, the Marina Corporation was formed to develop 55 acres bounded by Fillmore, Scott, Chestnut and Marina Boulevard. Here, diagonal and curvilinear streets were installed to provide bay views and promote the idea of a

residential park. Residential and commercial uses were generally segregated as the result of the passage of San Francisco's first zoning law in 1917.[15]

In the 1920s and 1930s, the new Marina District—as the former Harbor View area came to be known—experienced a sustained residential building boom. New houses, flats, and apartments were constructed in a variety of architectural styles, with Mediterranean Revival and Classical Revival influenced designs by far the most popular. Other common influences included Tudor Revival, Spanish Colonial Revival, and French Provincial designs, as well as scattered examples of Art Deco style buildings. The subject building, built as the Ladies Protective & Relief Society retirement home on a large parcel at the northwest corner of Francisco and Laguna Streets, was one of the most prominent new buildings in the Marina.



Figure 54: East end of the Marina District in 1938, showing Lobos Square/Funston Playground left of center and subject property indicated with red arrow; note the gas storage tank north of Funston Playground. Source: Harrison Ryker, accessed at the David Rumsey Map Collection

[15] VerPlanck, "Marina District Development Takes Off," *Heritage News*, Vol. XXXV, No. 4, Fall 2007, 5.

Civic development accompanied the growth of the Marina District. This included construction of the Funston Playground (now called Moscone Recreation Center, located directly west from the subject building), as well as the Marina Junior High School (1937). Chestnut Street evolved as the primary commercial corridor, largely because it marked the route of the Geary-Van Ness streetcar line, later replaced by buses. By the late 1930s, the Marina District was almost completely built out **(Figure 54)**. Promotional literature from the 1930s touted the Marina District's schools, parks, tennis courts and thousands of beautiful homes as the "garden spot" of San Francisco.[16]

World War II brought a rush of military activity at Fort Mason and the Presidio. Fort Mason supervised transportation activities at other installations in the Bay Area and was used as a port of embarkation for military personnel.

During the mid-20th century, Lombard Street—providing direct access to the Golden Gate Bridge—was developed with a large number of motels catering to auto tourists. More recently, the Marina District suffered severe damage during the 1989 Loma Prieta Earthquake, as liquefaction of the land filled for the PPIE caused buildings to collapse and gas mains to burst. The damaged properties have since been renovated or rebuilt, and the neighborhood is currently considered an attractive residential district within the city.

SOCIAL WELFARE AND OLD AGE HOMES

The following history of old age care facilities in San Francisco is informed by the historic landmark nomination for the University Mound Old Ladies' Home, completed by staff of the San Francisco City Planning Department in 2015, unless otherwise noted.[17]

Retirement and old age care has historically responded to shifts in social and economic conditions and social reform legislation. In the pre-industrial era, the aging farmer was likely to be employed as long as his health held out. As Americans increasingly earned their livelihoods at factories rather than farms, older people in cities became less able to participate in remunerative activities, and were often forced into poverty, living in almshouses or other institutions with other needy persons, orphans, and the insane. Late 19th century welfare and charity workers advocated for separate institutionalization of poor elders, forming a "home" that provided cheap, efficient care for those not only destitute but likely infirm as well. However, many questioned the propriety of sending the

[16] Sanborn Map Company (1924-1949); San Francisco Public Library Vertical Files: "SF Districts: Marina;" Chris VerPlanck, "From Mud Flats to Marina: Building a San Francisco Neighborhood," *Heritage News* 35 (Summer 2007), 5-8.
[17] San Francisco Planning Department, "Landmark Designation Report, University Mound Old Ladies' Home, 350 University Street," May 20, 2015.

middle-class old people to these same places for care, and instead, many private old age homes were founded around this time period. By the end of the century, most of the residents in an old age home were white, middle-class women who had paid to enter. [18]

The first old age home for ladies in Philadelphia, the Indigent Widows' and Single Women's Society (Society) opened in 1817, and provides insight into the model of private nursing homes. The Society declined any applicant who had been raised in poverty, and accepted respectable women who came from refined walks of life and were used to certain comforts. The Society wanted the women to see the institution as their home and the other inmates as their family. To this end, women were provided private rooms and meals were taken at a general table meant to ensure a feeling of family unity. Each applicant was required to give proof of her character and provide recommendations. Once admitted, she was given a one-year probationary period and expected to donate her labor, sewing, knitting, and quilting to help raise money for the institution.[19]

By the beginning of the 20th century, scores of similar homes were in every large American city.[20] In 1932, shortly after the San Francisco Ladies' Protection and Relief Society was completed and opened at 3400 Laguna Street, the San Francisco city directory listed 25 "Homes and Asylums," including seven orphanages and five asylums specifically for women or girls. Of the institutions listed at this time, only four are extant and still operate as convalescent/nursing homes. In addition to the Ladies' Protection and Relief Society at 3400 Laguna Street, these include the Hebrew Home for the Aged and Disabled (Jewish Home San Francisco) at 302 Silver Avenue (designed by Samuel Lightner Hyman, 1923, extensively altered in 1969 by Howard Friedman and with a 1970 courtyard and fountain designed by Lawrence Halprin); the Christian Science Benevolent Association on the Pacific Coast (Arden Wood) at 445 Wawona Street (designed by Henry Gutterson, 1930) and the University Mound Old Ladies' Home, at 350 University Street (designed by Martin J. Rist and Alfred I. Coffey, 1931-2) **(Figure 55 to Figure 57)**.

[18] San Francisco Planning Department, "Landmark Designation Report, University Mound Old Ladies' Home, 350 University Street," May 20, 2015, 20-1.
[19] Carole Haber, *Beyond Sixty-Five: The Dilemma of Old Age in America's Past* (Cambridge: Cambridge University Press, 1983).
[20] Haber, *Beyond Sixty-Five: The Dilemma of Old Age in America's Past*.



Figure 55: Jewish Home of San Francisco, 302 Silver Avenue, view of 1969 Howard Friedman addition. Source: www.jhsf.org



Figure 56: Christian Science Benevolent Association on the Pacific Coast (Arden Wood), 445 Wawona Street, designed by Henry Gutterson, 1930. Source: www.ardenwood.org



Figure 57: University Mound Old Ladies' Home, designed by Martin J. Rist and Alfred I. Coffey, 1932. Source: San Francisco Public Library, AAD-0005.

Changes in federal law during the first half of the twentieth century had significant impacts on the landscape of welfare care in the United States—particularly eldercare. The 1935 Social Security Act

provided direct payments to many American elderly, who may not have been able to afford private care facilities in the past. In 1946, Congress passed the Hill-Burton Act, offering federal subsidies to fund modern hospital construction. In 1954, the Hill-Burton Act was expanded to fund hospital-affiliated nursing homes.[21] This change in policy coincided with the growing popularity of private nursing homes in the United States, which formed a marketplace of eldercare options through the 1950s and 1960s. Clear evidence of this trend is available in San Francisco city directories: in 1951 and 1952, directories listed only one nursing home, and in 1953 none were listed. The 1955-1956 directory, however, had thirteen. These facilities do not appear to be related to hospitals in the city and therefore are unlikely the direct result of the Hill-Burton Act, but their establishment conveys a new era in eldercare—in which care for the aging transitioned from the sphere of social welfare into the broader sphere of modern medicine and healthcare.

[21] Laura Katz Olson, *The Not-So-Golden Years: Caregiving, the Frail Elderly, and the Long-Term Care Establishment* (Lanham, MD: Rowman & Littlefield, 2003), 158.

V. SITE HISTORY

SITE DEVELOPMENT

Prior to the construction of 3400 Laguna Street in 1925, the subject site was platted but largely undeveloped until the construction of the Panama-Pacific International Exposition in 1915. The site was located in the Amusement and Concession Zone of the fair, and a detail of the 1915 Sanborn Insurance Company Map shows attractions including the Submarines, Natatorium, Indian Pueblo, Incubator, and the Grand Canyon of Arizona on or near the subject site **(Figure 58).**

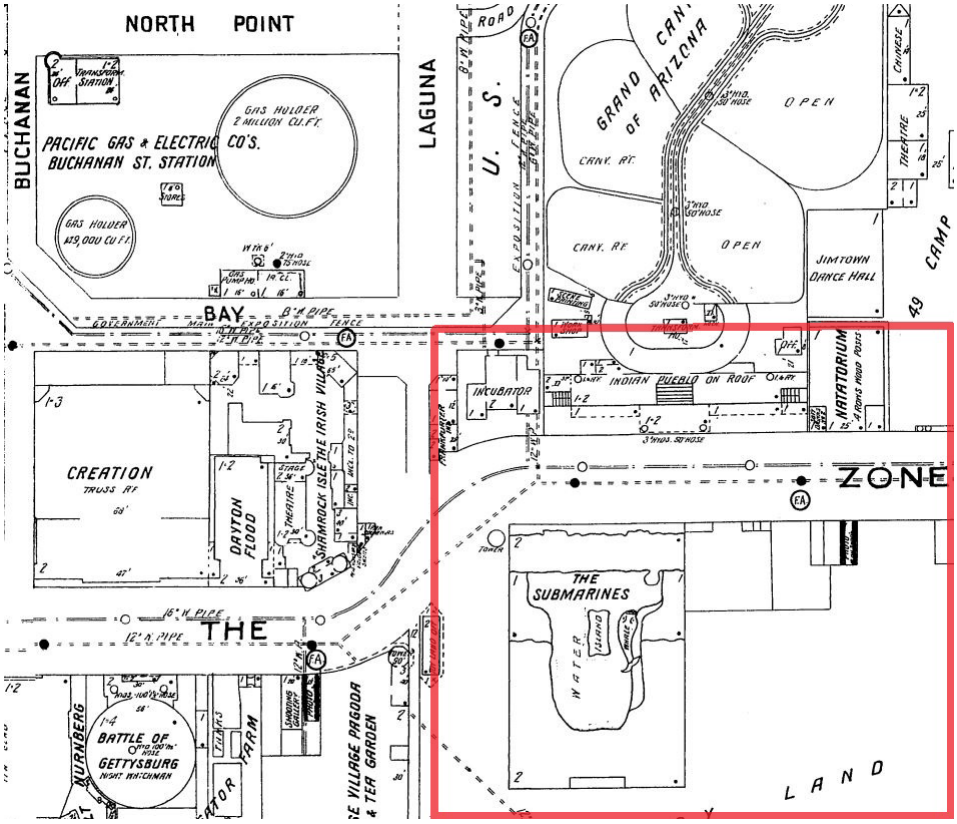


Figure 58: 1915 Sanborn Fire Insurance Company Map, with the approximate subject site outlined in red; note location of the gas holding tanks of the Pacific Gas and Electric Co. amid the fairgrounds, at the northwest corner of Laguna and Bay. Source: San Francisco Public Library.

After the close of the fair, all of the amusements and their related buildings were demolished, and the subject site was vacant in the early 1920s—at which point it was donated to the Ladies' Protection and Relief Society.[22] Although original bulding permits for 3400 Laguna Street have not

[22] "History," Heritage on the Marina, February 10, 2023, https://heritageonthemarina.org/about-heritage-on-the-marina.

been recovered, the completion of the building, designed by prominent architect Julia Morgan, was announced in the *San Francisco Chronicle* on May 15, 1925. The building was described as three stories over a basement, built to face Funston Square. The construction costs were partly covered through a $50,000 donation from the late Lizzie G. Hovey, friend of the institution; what is described as an "attractive Serena court in the garden" was made possible by a bequest from Serena Goodall Keil.[23]

A 1925 photograph, noted on the back as the "new home of the S. F. Ladies Protection and Relief Society," shows the primary and south facades of the building, with few differences from the building's current appearance **(Figure 59)**. The double arches of the primary entrance are portals opening to a recessed vestibule, rather than enclosed as they are today; however, their shape and configuration remain the same. None of the penthouses, elevator tower, or stair tower are visible: although no permits are on file for the additon of these features, they appear to have been constructed after 1925.



Figure 59: 1925 photograph of 3400 Laguna Street. Source: Lothers and Young Collection, San Francisco Historical Photograph Collection, AAC-9988.

[23] "Society in New Home," *San Francisco Chronicle*, May 15, 1925.

The stone cottage near Bay Street was constructed as a dwelling from late 1928 to 1929.[24] The building was designed by local Berkeley designer and contractor Ernest Higgins.



Figure 60: Aerial photograph of 3400 Laguna Street in 1938, showing extensive grounds east of the building. Source: Harrison Ryker photograph, accessed at the David Rumsey Map Collection.

A 1938 aerial photograph of the subject property shows the extensive landscaped grounds to the east of the building, which appear to extend to full depth of the current rear courtyard, and include pathways, mature vegetation, and gridded plantings, but does not include the two squared fountains and brick patio that are currently within the center courtyard **(Figure 60 and Figure 61)**. Although the resolution of the photograph does not provide conclusive information about whether the penthouse and elevator stack had been constructed by this time, there is a clearly visible stair

[24] "Building Contracts, Etc." *The Recorder.* 1928 Dec 10. Accessed February 13, 2023; *Building and Engineering.* Volume 28, July to December 1928. Accessed February 13, 2023. Note that the plaque for the stone cottage that is located on the site states that the cottage was constructed in 1925 and funded through a donation by Edith Allyne.

stack corresponding with the location of the current stair stack to the penthouse, suggesting that the penthouse was in place at this time.



Figure 61: Gardens of the Ladies' Protection and Relief Society, 1935. Source: San Francisco Historical Photograph Collection, #AAC-9991

The 1950 Sanborn Map Company map provides little new information about the subject property. The building is described as two-and-one-half stories over a basement, with steam heat and electric lights. The stone cottage—the only other building within the grounds at this time—is noted on the Sanborn map as in use as a storehouse **(Figure 62)**.

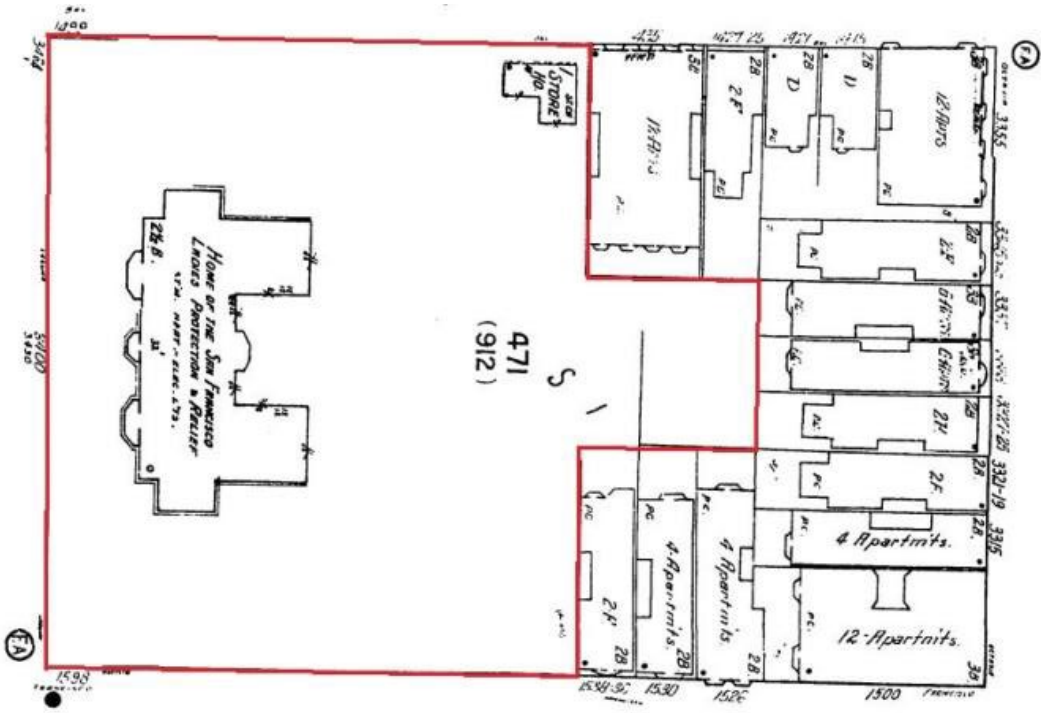


Figure 62: 1950 Sanborn Fire Insurance Company Map, with the subject site outlined in red
Source: San Francisco Public Library Online Database

In a 1956 photograph of 3400 Laguna Street, the only change visible to the primary façade is the enclosure of the left arch of the front vestibule entrance **(Figure 63)**. In this photograph, the stair and elevator stacks are both visible.



Figure 63: 1956 photograph of 3400 Laguna Street. Source: San Francisco Historical Photograph Collection, #AAC-9989

Also in 1956, permits were drawn for the construction of an addition to 3400 Laguna Street. The addition was designed by architect Warren C. Perry, and provided space for new residents, which was necessary after the merger of the San Francisco Ladies' Protection and Relief Society with the Crocker Old People's Home. Originally permitted as a three-story addition, a second permit was requested in 1957 to add a fourth floor, reflecting the building's current configuration. The new wing was completed at a reported cost of $1 million and was at that time the first facility specifically designed for the aged to be built in San Francisco in more than 25 years.[25] Residents moved into the facility in 1957. A permit to remodel the stone cottage was also issued in 1957, listing Hewitt C. Wells as architect. A plaque at the site states that this building was "reconstructed" that year. It appears that building was returned to its original use as a dwelling under this scope of work, and the building is referenced as the "superintendent's cottage" in a 1958 article in the *San Francisco Examiner* titled "Home for Aged Opens Tomorrow."[26] Additional alterations that may have occurred at that time include repointing and construction of the boxed bay at the west façade.

In 1962, architect Gardner A. Dailey was contracted to design another addition to the building. This addition was a one-story infirmary, with reinforced concrete walls, roof and floor. The cost of construction was reported at $300,000, and the building was designed to handle 32 patients.[27] The addition's simple utilitarian design reflects its serious medical use. Further 1986 additions to the wing, by Spencer & Associates, have enlivened the building with brick-clad gables and a glazed sunroom that reference the Tudor/Jacobethan architectural style of the original Julia Morgan building.

A Sanborn Map Company map updated to the mid-1990s shows the O-shaped footprint created by the 1925 main building, the L-plan 1956 addition, and the slim rectangular footprint of the 1963 addition **(Figure 64)**.

[25] "For a Better Old Age," *San Francisco Chronicle*, April 25, 1958.
[26] "Home for Aged Opens Tomorrow." *San Francisco Examiner.* April 17, 1958. Accessed February 13, 2023.
[27] "The Heritage Extension Work Begins," *San Francisco Chronicle,* November 21, 1962.

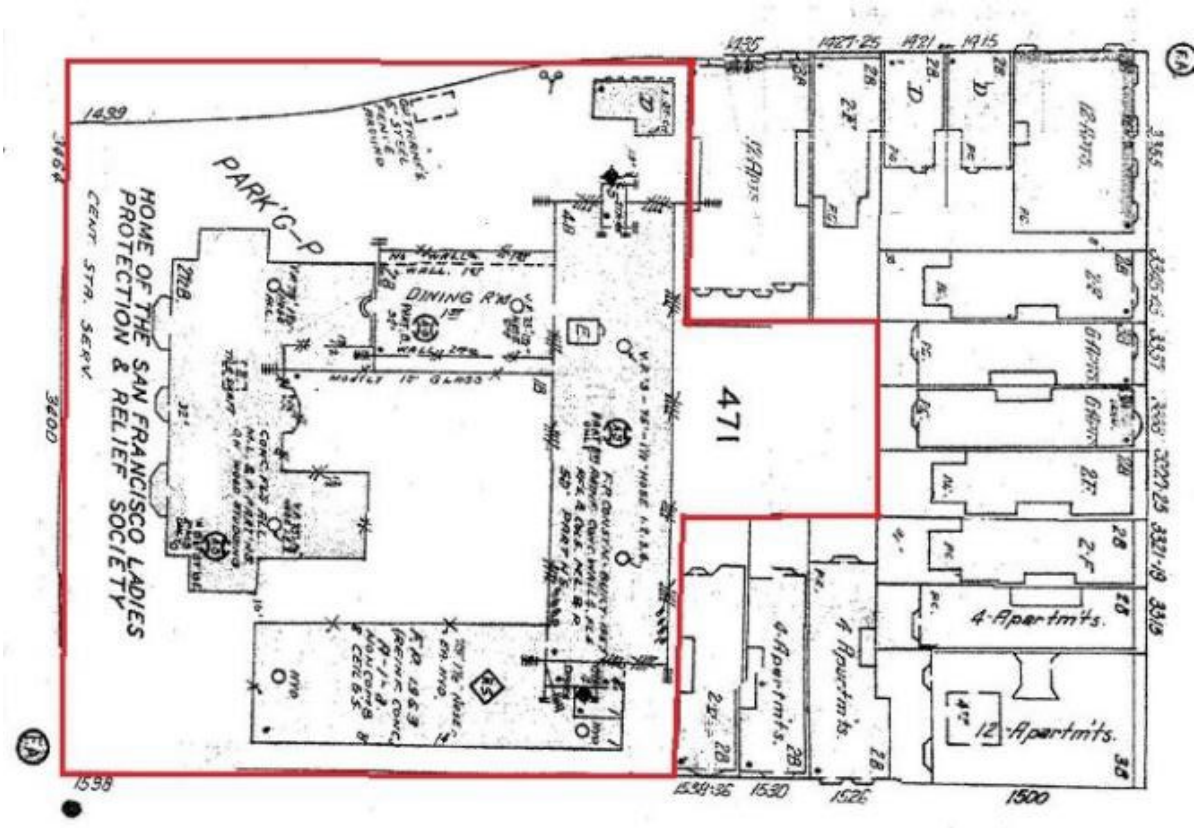


Figure 64: Mid-1990s Sanborn Insurance Map, subject site outlined in red; this map does not show the 1986 additions to the 1963 addition. Source: San Francisco Property Information Map.

In 1993, the loading area at the north façade of the main building was reconfigured to include an exterior platform and metal roof, reflecting its current appearance. Alterations to the building since the mid-1990s have been largely interior or related to building upkeep (full permit record follows); in 1994, however, a series of aluminum windows was replaced with wood-clad metal windows at the first story of the north portion of the 1956 addition, affording this area of the addition greater compatibility with the older building that it adjoins.

Construction Chronology

The following table provides a timeline of major construction activity at 3400 Laguna Street, based on building permit applications on file with the San Francisco Department of Building Inspection. Cancelled and expired permits are not included. The building has also experienced numerous alterations to its fire safety and ventilation systems, as well as minor interior renovations. These are not listed below.

Date Filed	Permit Number	Owner	Architect (a) or Contractor (c)	Scope of Alterations
7/27/1956	187273	Ladies' Protection and Relief Society	Warren C. Perry (a); Erpentraut & Summers (c); Thomas E. Chace (eng.)	New 3 story addition with a basement
1/16/1957	194048	Ladies' Protection and Relief Society	Warren C. Perry (a); Erpentraut & Summers (c); Thomas E. Chace (eng.)	Add 1 floor to the new building now under construction
6/24/1957	199407	Ladies' Protection and Relief Society	Hewitt C. Wells (a); Wagner & Martinez (c)	Remodeling of existing stone cottage
8/23/1962	270319	The Heritage	Gardner A. Dailey (a); Gilbert, Forsberg, Diekmann, Schmiidt (arch. const); Swinerton & Walberg Co. (c)	New 1-story infirmary addition with basement, with reinforced concrete walls, roof & floors, and metal stud partitions
12/30/1963	292115	The Heritage	Gardner A. Dailey (a)	New bathrooms added to second and third floors with some partition changes
6/13/1980	461073	The Heritage	Unknown	8 sliding glass doors
10/26/1989	626043	The Heritage	Plant Builders Inc. (c)	Remove 2 masonry fireplaces & chimneys (damaged in earthquake) and provide waterproof caps
5/27/1990	651545	The Heritage	Plant Builders Inc. (c)	Reconstructed 3 brick chimneys from attic upwards (exact replacements)
6/4/1993	722871	The Heritage	Thomas R. Potts (a)	Construct additional platform area at loading dock and add light weight metal roof over platform area
7/28/1993	726419	The Heritage	Muratore Corp.	Repair tile around drain and correct leaks at existing terrace deck
10/15/1993	732103	The Heritage	Dasse Design	Parapet and ornament bracing
12/2/1993	722871	The Heritage	Thomas R. Potts (a)	New horizontal extension consisting of new loading

Date Filed	Permit Number	Owner	Architect (a) or Contractor (c)	Scope of Alterations
				dock metal roof and support system
11/10/1994	758539	The Heritage	Muratore Corp.	Replace aluminum windows with wood windows to conform to the rest of the building in existing openings
6/12/1996	796188	The Heritage	Barker Assoc.	Replace existing deteriorating front entry hand rail and guard rail
8/12/1997	828851	The Heritage	Lawson Roofing Co.	Remove roofing, install "taper installation system"
8/15/1998	857399	The Heritage	Lawson Roofing Co.	Reroofing work
5/7/2002	965971	The Heritage	Western Roofing Service	Remove & replace existing slate roof to match existing
2/20/2015	201502208910	Not listed	Not listed	Reroofing at unspecified location
9/2/2016	201609026686	Not listed	Not listed	One story horizontal addition at unspecified location
9/17/2018	201809170424	Not listed	Not listed	Renovation of interior of cottage with additional exterior scope replacing access ramp and railing and existing wood fence
5/13/2022	202205134177	Not listed	Not listed	Reroofing at unspecified location

OWNERSHIP AND OCCUPANT HISTORY

Select Owner and Occupant Biographies

HISTORY OF THE LADIES' PROTECTION AND RELIEF SOCIETY, ORIGINAL OWNER

The following history of the Ladies' Protection and Relief Society is sourced from the collection of the California Historical Society, accessed at the Online Archive of California, unless otherwise cited.[28]

With the stated mission to "render protection and relief to strangers, to sick and dependent women and children," a group of middle-class San Francisco women, headed by philanthropist Mrs. A.B.

[28] California Historical Society, "Finding Aid to the San Francisco Ladies' Protection and Relief Society Records MS 3576," *Online Archive of California,* Accessed February 13, 2023, https://oac.cdlib.org/findaid/ark:/13030/kt338nf0rf/?query=Ladies%E2%80%99+Protection+and+Relief+Society

Eaton, formed the San Francisco Ladies' Protection and Relief Society in 1853. From an office at 151 Sacramento Street, a Board of Lady Managers was placed in charge of the daily affairs, and a Board of Trustees managed financial decisions. The Society offered relief to women and their dependent children who had moved to San Francisco seeking relatives or fortunes, only to find themselves alone and impoverished.

By 1857 the Society had grown from an office to a live-in home at Second and Tehama Streets known as the "Hospitality House." The Society developed a program to help orphans find adopted families. In 1858 the Act of Legislature granted the Society permission to apprentice the children in a system known as "binding out." Doubling as an employment agency, the Society sent orphans to work in local businesses or in family homes as domestic servants. While this was a charitable effort, it also represented class attitudes of the Society members who sought to place the children in lower paying jobs, which reflected what they believed to be the children's proper station in life.

In 1860 the Society moved again, to an imposing brick structure designed by S.C. Bugbee, at the intersection of Geary Avenue and Franklin Street, an area that was at that time considered the edge of town **(Figure 65)**. The house served as both home and school, with lessons in sewing, cooking and moral training for young women. Most of the women were trained to go into department sales, hairdressing and later, clerking and typing. This system of in-house education continued until 1913, after which the children were educated in the public schools.

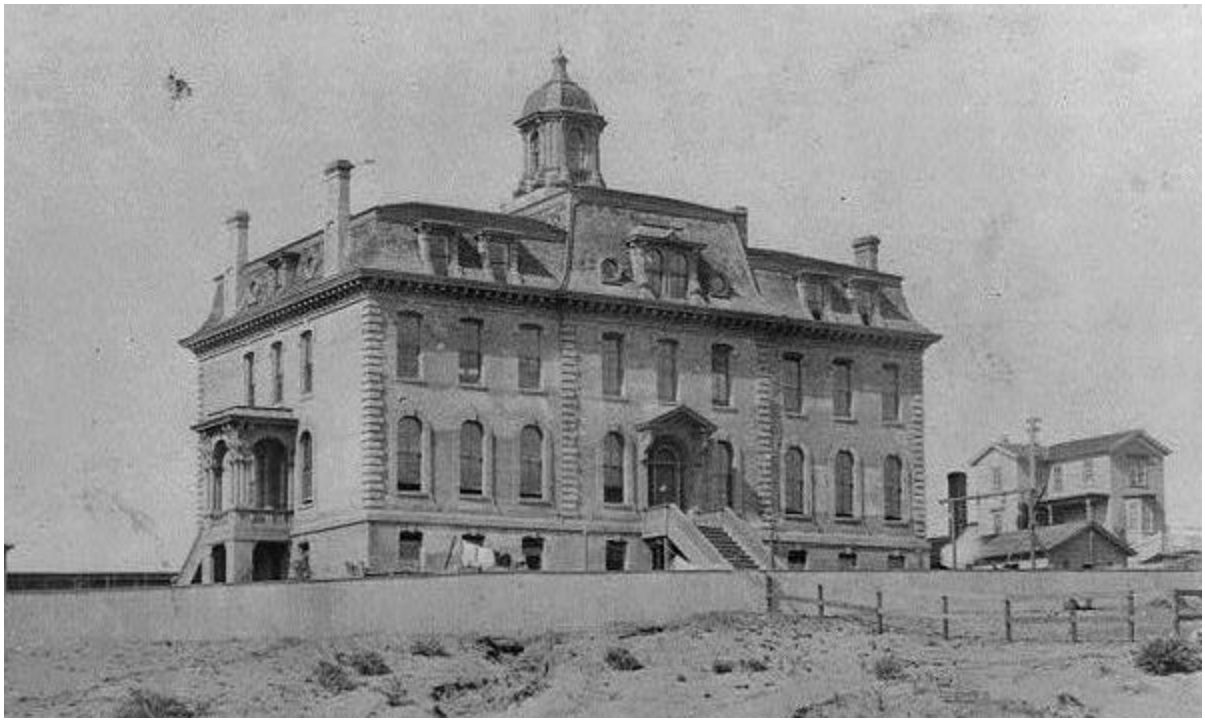


Figure 65: Second home Ladies' Protection and Relief Society, at Geary and Franklin streets, c. 1865. Source: Library of Congress

Attitudes regarding childcare institutions changed in the 1920s, and foster care homes started to replace the impersonal atmosphere of the large, often overcrowded institutions. In response to the changing ideology, the Society began to discuss what other social services they could offer the city of San Francisco. After much deliberation, they chose to help the elderly. The Society commissioned noted architect Julia Morgan to design a new facility to serve as a retirement home at 3400 Laguna Street. After it opened in 1925, the home developed a reputation of one of the finest private retirement homes in the city.

The terms for admission were laid out as follows in a *San Francisco Chronicle* article marking the opening of the new facility:

> [....] A nominal charge of $1 a day will be made, subject to modification for special need. No worthy person entitled to such care as we plan to give will be excluded from the benefits of the home, save as space is limited. Convalescent women and children (not bed patients) will be received for a term of three weeks. Dependent women will be received for life, if their conduct proves such as to make them adaptable to the general environment.[29]

[29] "Society in New Home," *San Francisco Chronicle*, May 15, 1925.

The public was invited to the opening of the Society's new facility over the weekend **(Figure 66)**.



Figure 66: *San Francisco Chronicle* article announcing the opening of the new home of the Ladies' Protection and Relief Society, including the home's oldest resident, Mrs. Amy Walker, 87. Source: *San Francisco Chronicle*, May 15, 1025

The Society retained ownership of the property at Geary and Franklin, however, and this land continued to be of great value. After leasing the property to various businesses over the years, the Society drafted a tremendously lucrative contract with the Jack Tar Hotel. This 1954 contract assured them of a secure economic future.

The Scandinavian Benevolent and Relief Society was among the many Victorian relief societies which existed at the same time as the San Francisco Ladies' Protection and Relief Society. Founded in 1875 by Minnie Nelson, the Society was dedicated to the care of the elderly. With a staff of volunteers, they established an "old people's home" on Francisco Street near Powell and Stockton. The Society remained at this site until 1884, when Mary Crocker offered her lot at the corner of Pine and Pierce as a memorial to her late husband Charles Crocker, the railroad magnate. When the Society moved to their new location, they promptly changed their name to the Crocker Old People's Home. After

the San Francisco Fire Department condemned the building as a fire hazard in the 1930s, the Society engaged in 20-year legal dispute until they were finally forced to leave in the early 1950's.

After much discussion and litigation, the San Francisco Ladies' Protection and Relief Society and the Crocker Old People's Home decided to merge into a single organization. After completion of a new wing at the Julia Morgan building at 3400 Laguna Street, the Crocker Old People's Home moved in 1957. The merged entity continued operating as the San Francisco Ladies' Protection Society, renaming the 3400 Laguna Street facility "The Heritage" in 1959. After the merger, the organization's mission shifted away from convalescent care—which had been one focus of the Ladies' Protection and Relief Society for many decades—towards an exclusive eldercare mission.[30]

The organization is officially now the San Francisco Ladies' Protection and Relief Society DBA (doing business as) The Heritage. In 2013, a new DBA name was added: Heritage on the Marina. This organization has been in operation in San Francisco for over 160 years.

BIOGRAPHIES OF ARCHITECTS AND DESIGNERS

Julia Morgan

Julia Morgan (1872–1957) was born in San Francisco and grew up in Oakland. After graduating from high school, she enrolled in the College of Civil Engineering at the University of California, and in 1894 became the first woman at the University to graduate with a degree in civil engineering. She subsequently studied with famed architect Bernard Maybeck, who encouraged her to enroll at the prestigious École des Beaux-Arts in Paris.[31] Through the influence of Maybeck, Morgan was visited by Phoebe Apperson Hearst during her time in Paris, resulting in a longstanding association with the Hearst family that would lead to a number of important commissions.[32] In 1901, Morgan graduated from the École des Beaux-Arts, becoming the first woman to receive a certificate in architecture from the École.

Morgan returned to the San Francisco Bay area and worked for a time with the architect John Galen Howard. During this time Morgan completed drawings for the Hearst Mining Building at the University of California. Morgan also worked on drawings for the University's Greek Theater, and served as supervisor for its construction.

[30] "History," Heritage on the Marina.
[31] Sara Holmes Boutelle, *Julia Morgan Architect*, (New York: Abbeville Press Publishers, 1995), 23-24.
[32] Cary James, *Julia Morgan*, (New York: Chelsea House Publishers, 1990), 45.

In 1904 Morgan became the first woman in California registered as an architect. Among her first commissions was remodeling the Hacienda del Pozo de Verona, the large county residence of Phoebe Apperson Hearst. This was followed by a commission to design a Mission-style bell tower known as "El Campanil" for Mills College, a women's college in Oakland (1904). More designs for Mills College followed, including the Margaret Carnegie Library (1905), a gymnasium, and an infirmary. Working at a time when women's organizations were growing in prominence, Morgan was frequently chosen as the architect for their institutional buildings, which comprised the majority of her non-residential work.[33] Among her most important clients was the Young Women's Christian Association (YWCA), for whom she designed building in numerous California cities **(Figure 67)**.



Figure 67: Oakland YWCA, constructed 1913-1915. Source: Google Images

Morgan's career was propelled in part by rebuilding efforts following the 1906 earthquake and fire, including the reconstruction of the Fairmont Hotel in San Francisco. In 1907, she moved into an office at the Merchants Exchange Building in San Francisco, where she remained for several decades.[34] Over the ensuing years, Morgan was commissioned to design hundreds of buildings, both residential and institutional. In her designs, Morgan was "eminently practical in her use of form, space and structure. [...] The exteriors of her buildings show a balance between deliberate understatement of the whole and precise definition of the parts."[35] Her work was not confined to any particular architectural style, but rather demonstrated flexibility in blending American and European historical influences with her Classically inspired Beaux-Arts training.

[33] Richard W. Longstreth, *Julia Morgan – Architect*, (Berkeley: Architectural Heritage Association, 1986), 6.
[34] Boutelle, *Julia Morgan Architect*, 42
[35] Longstreth, *Julia Morgan*, 9.

Morgan was also strongly influenced by the increasingly popular Arts and Crafts style, which in the San Francisco Bay area was absorbed into what is today known as the First Bay Tradition. In this respect, Morgan often eschewed complicated structural devices but was perfectly willing to expose structural members when she felt they were "compatible with other aspects of the design; that is, when both utilitarian and aesthetic purposes were served without compromising either."[36]

Morgan maintained a working relationship with Phoebe Hearst's son, William Randolph Hearst. In 1919, William Randolph Hearst also began working with Morgan on the designs for an estate known as "Casa Grande" in the Santa Lucia Mountains near San Simeon, California. Over the next eighteen years Morgan was involved in work on the building, today famed as Hearst Castle.



Figure 68: Sketch for the Berkeley City Women's Club, c. 1929. Source: landmarkscalifornia.org

She also worked on several clubhouse buildings, including the Sausalito Women's Club (1916-18), the Claremont Club in Berkeley, the Foothill Club in Saratoga (1915), the Studio Club in Hollywood (1926), and the Romanesque/Moorish styled Berkeley City Women's Club (1929) which is the Berkeley City Club today **(Figure 68)**.[37] She designed another women's use building, the Ladies'

[36] Longstreth, *Julia Morgan*, 28.
[37] James, *Julia Morgan*, 87.

Protection and Relief Society in San Francisco, in 1925. In 1929 she was recognized by the University of California with an honorary doctoral degree.

In 1932, Morgan underwent an operation for an infected ear that resulted in the severing of nerves that affected her balance and left her with a facial droop.[38] Nevertheless, she continued working on commissions, including remodeling the Hearst Building in San Francisco (1937), as well as a complex of Bavarian-styled buildings at William Randolph Hearst's Wyntoon estate near Mount Shasta. She also continued to design columbaria, including the Homelani Columbarium in Hilo, Hawaii (1935-37), as well as the Chapel of the Chimes Mortuary in Santa Rosa (1938).[39]

By the 1940s, however, Morgan began slowing her architectural practice, in part because of recurring memory lapses.[40] In 1950 she closed her practice altogether, and after a series of small strokes became reclusive.[41] She died at age 85 in February of 1957, and is buried in the Mountain View Cemetery in Oakland. In 2014, the American Institute of Architects posthumously awarded the AIA Gold Medal to Julia Morgan. Morgan is the first woman to ever be given the AIA Gold Medal.[42] She has been recognized internationally as one of the United States and California's most prominent architects and is considered to be an architect of merit.[43]

Warren C. Perry

Warren Charles Perry was born May 12, 1884 in Santa Barbara, California, but grew up in Berkeley, where his family had moved when he three years old.[44] He graduated from Berkeley High in 1903 and began undergraduate studies in Civil Engineering at the University of California at Berkeley. Perry took classes with John Galen Howard and during the summers of 1906 and 1907 worked in Howard's San Francisco office. Perry traveled to Paris in the fall of 1907 to study at the renowned École des Beaux-Arts, and returned to the Bay Area in 1911. He joined the faculty of the Department of Architecture at Berkeley that year, and began to work on residential and commercial projects in

[38] James, *Julia Morgan*, 97-98.
[39] Mark Anthony Wilson, *Julia Morgan Architect of Beauty*, (Santa Barbara: Gibbs Smith, Publisher, 2007), 86-87.
[40] James, *Julia Morgan*, 102-105.
[41] James, *Julia Morgan*, 105.
[42] "Julia Morgan, 2014 AIA Gold Medal Recipient", American Institute of Architects website, accessed February 10, 2023, https://www.aia.org/awards/7046-gold-medal.
[43] While the National Register and California Register have previously used the terminology "master" architect or builder, the terminology used here to reflect current best practices is "architect of merit," which similarly refers to an architect with "recognized greatness" in their field, whether at a local, state, national, or, even an international, level.
[44] David Parry, "Warren Charles Perry". The Encyclopedia of San Francisco, accessed online at http://sfhistoryencyclopedia.com/articles/p/perryWarren.html.

Howard's San Francisco architecture firm.[45] In 1913 Perry was licensed and established his own practice.

Perry succeeded Howard as Chairman of the School of Architecture in 1927 and two years later was appointed Dean of the School, a position he held until 1950. Perry designed, alongside George Kelham, the George C. Edwards Track Stadium, which opened in 1932 **(Figure 69)**.

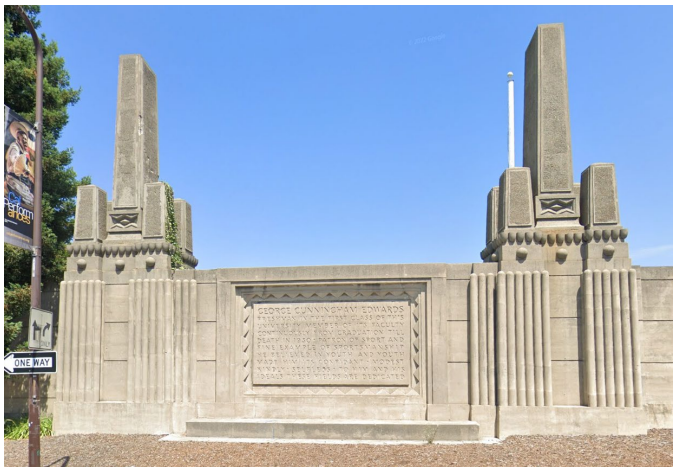


Figure 69: George C. Edwards Track Stadium at UC Berkeley. Source: Google Maps, 2022.


Figure 70: 2530 Vallejo Street, San Francisco. Source: Google Images

Perry's teaching responsibilities did not allow a great deal of time for private practice, but he did complete some residential projects in San Francisco—including 2530 Vallejo, a blend of the classical and shingle styles, for his family **(Figure 70)**, as well as 3140 Pacific (1926) and 3150 Pacific (1932), and a remodeled Victorian at 3028 Clay. Some other prominent houses in the city designed by Perry are the Italian Renaissance-style corner house at 2585 Pacific (1924), 570 El Camino del Mar in Sea Cliff (1930), and 165 Terrace Drive in St. Francis Wood, designed in 1936.

Perry was a member of the State Board of Architectural Examiners for 13 years from 1931 to 1943, and served as president for two of them, 1934-35. He also served as vice president of the San Francisco Chapter of the American Institute of Architects (AIA) for two years, 1936-1937, and then as its president in 1938. Perry was recognized for his contributions to architectural education and the profession by being made a Fellow of the AIA, the highest honor that institution bestows, in 1947.

[45] "Warren Charles Perry, Architecture: Berkeley", University of California: In Memorium, 1980, accessed February 10, 2023 http://texts.cdlib.org/view?docId=hb1j49n6pv;NAAN=13030&doc.view=frames&chunk.id=div00073&toc.depth=1&toc.id=&brand=oac4.

Perry retired in 1954, making the design for the addition to the Ladies' Relief and Protection Society at 3400 Laguna Street one of his final projects. Perry died in San Francisco in 1980 at the age of 95.

Gardner A. Dailey

Gardner Dailey was born in St. Paul, Minnesota, in 1895 and moved to California in 1915 to work for Donald McLaren's landscape architecture firm.[46] He enrolled at the University of California, Berkeley in 1919, and continued his education at Stanford and Heald's Engineering School in San Francisco. Topics of study focused on botany and economics, as well as engineering and architecture. In 1926, he made a major tour of Europe, where he married Marjorie Dunne of San Francisco. Upon his return, he established his own architectural offices in San Francisco in 1926.

During the early years of his practice, Dailey focused on residential design in eclectic Spanish and Neoclassical styles exhibiting traditional revival influences in his work. In 1929, three years after establishing his architectural practice, his design for the Arnold House in Hillsborough was featured in the publication *California Arts and Architecture*.[47] A public commission for the Palega Playground Field House in San Francisco, constructed one year after the Arnold House, continued Dailey's early interest building in the Spanish Eclectic style.

Although his early work focused on the use of accepted historic styles, in the 1930s Dailey began to explore modern design. In 1935, he designed his first Modernist house, known as the Liebes House, in Hillsborough, which was distinguished by a two-story staircase and full height windows. The Lowe House (1936) in Woodside, was one of Gardner Dailey's most famous pre-war houses, published widely from 1936-1942. This house conveyed the "Early California" aesthetic favored by Dailey and his rival William Wurster at this time, derived from adobe ranch houses and spare timber-framed, rural vernacular structures built by Anglo farmers and miners **(Figure 71)**.[48]

An informal attitude and a desire to harmonize buildings with their sites connected Gardner Dailey with his counterparts, including William Wurster—the most recognized and studied of his contemporaries. Wurster and Dailey, along with a small group of Bay Area architects and landscape architects, came to define the second period of Bay Area regionalism of the 1930s and 1940s, known as the Second Bay Region Tradition.

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[46] "Biographical Note: Inventory of the Gardener A. Dailey Collection, 1923-1979", University of California at Berkeley, Environmental Design Archives, accessed online at http://www.oac.cdlib.org/findaid/ark:/13030/kt396nb7zw/admin/#bioghist-1.8.4.
[47] *California Art and Architecture* (July 1929): 44-48.
[48] Pacific Coast Architecture Database, "Lowe, William, Jr., House, Woodside, CA", accessed February 10, 2023, https://pcad.lib.washington.edu/building/715/.

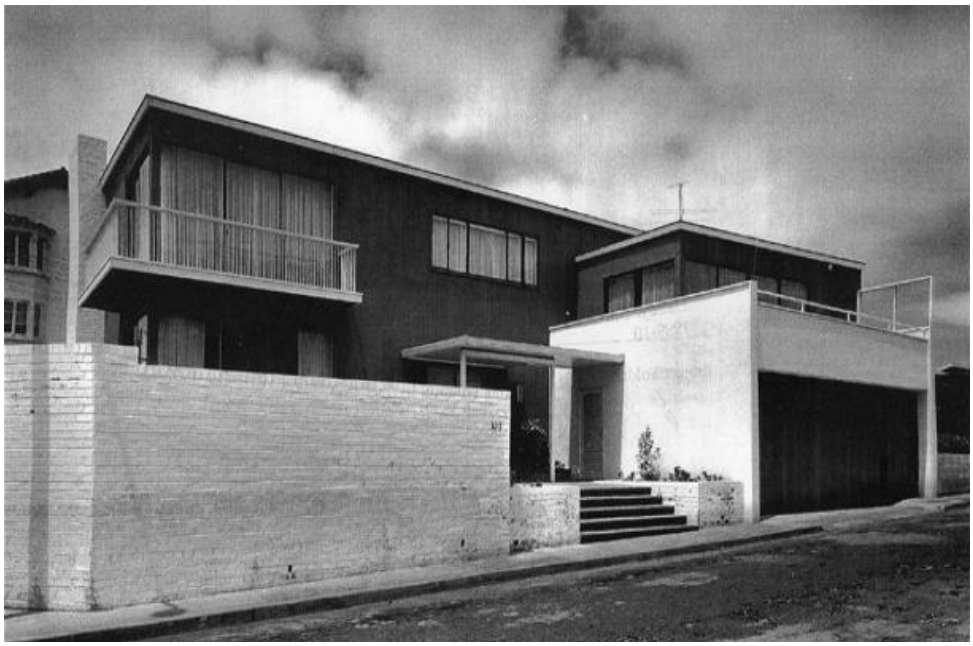


Figure 71: 1 Raycliff Terrace, San Francisco, 1951. Source: DOCOMOMO/NOCA.

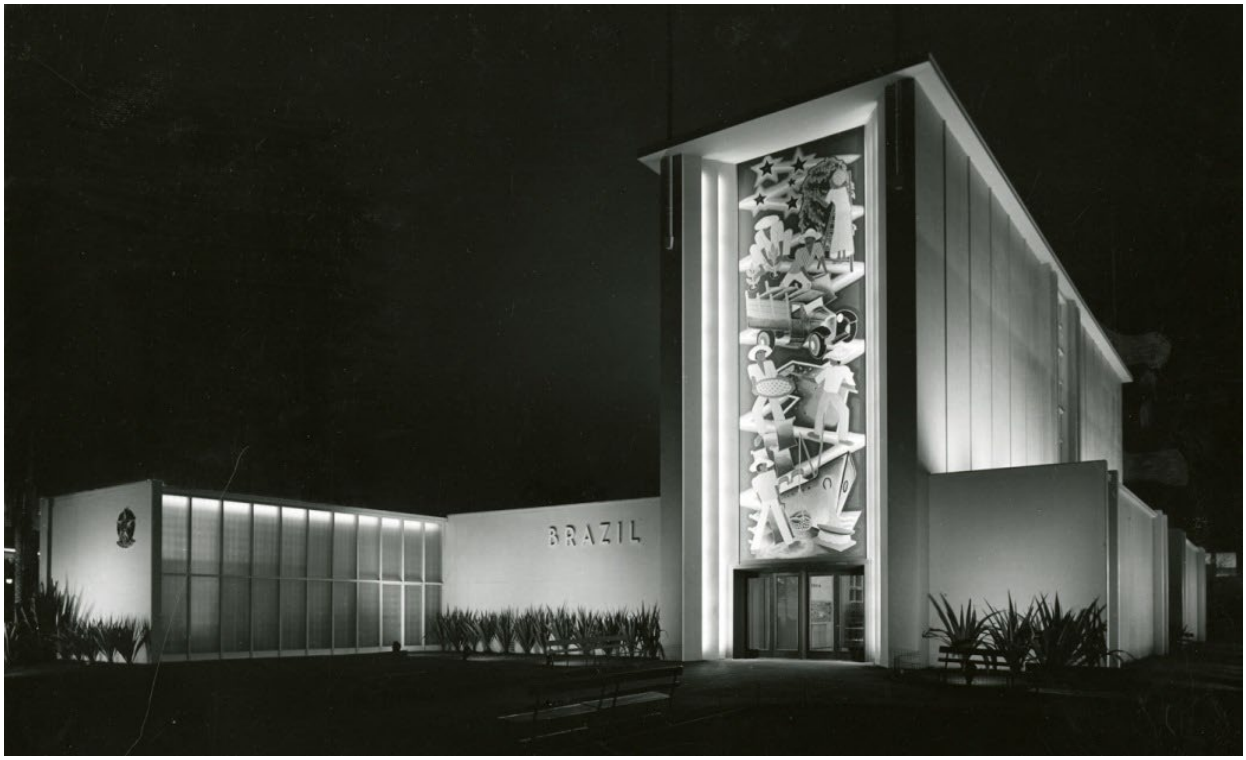


Figure 72: Brazil Building, for the Golden Gate International Exposition on Treasure Island, 1939 Source: UC Berkeley Environmental Design Archives.

In addition to residential design, Dailey's firm designed medical, commercial, educational, civic, and recreational buildings. He was commissioned by organizations including the Matson Shipping Company, Stanford University, University of California at Berkeley, and the San Francisco Recreation and Parks Department. He designed the Brazil Pavilion for the Golden Gate International Exposition on Treasure Island **(Figure 72)** and was included in the seminal New York Museum of Modern Art's 1944 show "Built in USA," as well as the San Francisco Museum of Art (now the San Francisco Museum of Modern Art) show "Domestic Architecture in the San Francisco Bay Region" in 1949.

Over the course of his career, Dailey wrote little about his buildings or the overarching theory that informed his designs. When asked by *Architectural Record* about the existence of a Bay Area Style, Dailey responded that, "…if there is a Bay Area Style it is because there are—and always have been—Bay Area People."[49] Although he is best remembered for his influence in establishing the Second Bay Region Tradition, the canon of Dailey's architectural works shows the rapid evolution of twentieth century architectural design during his career, and specifically its articulation within a Bay Area context. Works from his early period, although more conservative and traditional in approach, represent the formative period of his career and together with his later works, including the 1963 addition to the Ladies' Protection and Relief Society, shows the maturity and progression of one of the Bay Area's most prominent designers. Dailey died on October 24, 1967, at the age of 72.

[49] "Is there a Bay Area Style?" *Architectural Record,* 105, no. 5 (May 1949): 93-94.

VI. EVALUATION

CALIFORNIA REGISTER OF HISTORICAL RESOURCES

The California Register of Historical Resources (California Register) is an inventory of significant architectural, archaeological, and historical resources in the State of California. Resources can be listed in the California Register through a number of methods. State Historical Landmarks and National Register-listed properties are automatically listed in the California Register. Properties can also be nominated to the California Register by local governments, private organizations, or citizens. The evaluative criteria used by the California Register for determining eligibility are closely based on those developed by the National Park Service for the National Register of Historic Places.
In order for a property to be eligible for listing in the California Register, it must be found significant under one or more of the following criteria.

- **Criterion 1 (Events):** Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

- **Criterion 2 (Persons):** Resources that are associated with the lives of persons important to local, California, or national history.

- **Criterion 3 (Architecture):** Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.

- **Criterion 4 (Information Potential):** Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California, or the nation.

The following section examines the eligibility of 3400 Laguna Street for individual listing in the California Register.

Criterion 1 (Events)

The property at 3400 Laguna Street is significant under Criterion 1 (Events) at the local level as the contemporary site of one of the longest operating—if not the longest operating—eldercare service organizations in San Francisco. With the stated mission to “render protection and relief to strangers, to sick and dependent women and children," the San Francisco Ladies' Protection and Relief Society started providing services in San Francisco in 1853. The Society shifted from orphan and family care

to eldercare in the 1920s, and commissioned noted architect Julia Morgan to design an elder residence home at 3400 Laguna Street (which also provided space to convalescent women and children). The property at 3400 Laguna Street has made a significant contribution to the history of the city through early and ongoing efforts to protect and care for the city's older population.

In 1957, the San Francisco Ladies' Protection and Relief Society merged with the Crocker Old People's Home—another longstanding service organization, that was first established as the Scandinavian Benevolent and Relief Society in 1875. By the time of the merger, medically oriented private nursing homes were rapidly being established in the United States, and the Ladies' Protection Society had become one of numerous institutions providing eldercare to a wide range of San Franciscans. While the consolidated organization, known as "The Heritage," continued to reflect the institution's history of service and has remained a prominent retirement facility, its significant associations with the social welfare mission of the Ladies' Protection and Relief Society ended during the changing landscape of healthcare and eldercare in the 1950s. As all additions to the main building were completed either in support of or after the merger in 1957, these additions do not contribute to the significance of the property as the location of an early and long-operating eldercare facility. Only the main building and early extant landscaping features constructed in 1925, the stone cottage constructed in 1928-1929, and other pre-1957 alterations contribute to the significance of the property under Criterion 1.

The Crocker Old People's Home was also an established welfare and eldercare institution in San Francisco by the time of its relocation and merger with the Ladies' Protection and Relief Society in 1957. However, neither the 1925 main building nor the 1957 addition appear to convey this institution's significant associations with social welfare dating to the late nineteenth and early twentieth centuries. Therefore, 3400 Laguna Street is not eligible for listing in the California Register under Criterion 1 for its associations with the Crocker Old People's Home.

In summary, the elements of the property at 3400 Laguna Street that represent the early history of the site (including the main building, front lawn, and the stone cottage) are the best existing expression of the San Francisco Ladies' Protection and Relief Society's important social welfare mission of the twentieth century; therefore, this property is significant under Criterion 1 (Events).

Criterion 2 (Persons)

The property at 3400 Laguna Street is not significant under Criterion 2 (Persons) for any close association with persons important to local, California, or national history. Although many persons who have made contributions to the city's civic and artistic history have spent their later years at 3400 Laguna Street, research has not uncovered any person who lived at 3400 Laguna Street whose

contributions meet the threshold that would make the property significant for its association with those individuals. Likewise, significance of association with a person is generally assigned to buildings that are the location of a person's productive life, and residents of 3400 Laguna Street have generally moved to the property to rest and relax in their later years. Overall, 3400 Laguna Street does not have any direct association with any historically significant persons, and is therefore not historically significant under Criterion 2 (Persons).

Criterion 3 (Architecture)

The property at 3400 Laguna Street is significant under Criterion 3 (Architecture) as a representative work of prominent architect Julia Morgan and for the overall early design of the property, including the contributing elements of the original landscaping and 1929 stone cottage, which evoke an English-inspired setting for the eldercare facility.

Julia Morgan has been widely recognized as an architect of merit and is considered one of the most significant women architects in the United States. Morgan was the first woman to graduate from the University of California with a degree in civil engineering, the first woman to receive a certificate from the École des Beaux-Arts, and the first female registered architect in California. During the course of her forty-year career, Morgan was commissioned to design hundreds of buildings, both residential and institutional. Working at a time when women's organizations were growing in prominence, Morgan was frequently chosen as the architect for women's institutional buildings, which comprise the majority of her non-residential work. In style, her work demonstrates flexibility in blending American and European historical influences with her Classically inspired Beaux-Arts training.

The main building at 3400 Laguna Street was designed by Morgan and completed in 1925, slightly more than midway through the most productive years of her practice. In design, the building shows her noted ability to blend utilitarian needs—in this case, residential eldercare—with sophisticated aesthetics, without compromising either. The building possesses high artistic values in its overall form, balanced massing, abundant exterior terra cotta ornament, and its Jacobethan Revival architectural style expressed in features such as canted bays and the central gabled parapet on the primary façade. Morgan's mastery of façade composition is evident through the primary façade's vertical and horizontal design hierarchies. Windows at the first and second stories are similarly arranged but subtly different in size, leading up to the relatively modest third-story dormers. Likewise, projections at the north and south façades are recessed from the front façade plane; the first-story canted bays to the right and left of center draw the eye to the central paired entrance, canted oriel bay, and upper gabled parapet. The arrangement of the front garden was also completed in 1925, and while no designer is credited with its design, it is likely that Morgan was

involved to some degree as the garden creates a transition zone between the main building and the street and defines the setting of the main building.

The cottage was constructed in 1928-1929 by a local designer/contractor named Ernest Higgins. Research did not reveal any information to indicate that Higgins would be considered an architect or builder of merit at the local, state, or national level. The design of the stone cottage is unique in San Francisco, especially as an example of residential architecture. It evokes a similar English-based architectural influence as that of the significant Julia Morgan Jacobethan Revival main building, which is not commonly found in San Francisco. The cottage exhibits a high level of unique craftsmanship and generally retains its original appearance, having undergone some alterations limited to window replacements, the addition of a square bay window at the west façade, and interior modifications. While the cottage is not individually eligible under Criterion 3, it does contribute to the overall significance of the site under this Criterion as a continuation of the English-inspired architectural setting and is a contributing element to the significance of the property.

The architectural significance of the property does not extend to the 1957 Warren C. Perry addition or the 1963 Gardner A. Daily addition. Perry has not been identified as an architect of merit for the city, despite his important role at the University of California and his status as a fellow of the AIA. His design for the 1957 addition to 3400 Laguna Street is simple and utilitarian in design, and was completed after his retirement in 1954. Overall, the design of Perry's addition does not embody the distinctive characteristics of a type, period, region, or method of construction, or possess high artistic values. Gardener A. Daily, on the other hand, is considered an architect of merit in San Francisco, but his 1963 addition is also a simple and utilitarian design, completed in the last few years of his career. Moreover, the two later additions to the 1963 addition, completed in 1986, further dilute any architectural significance that the 1963 addition might have held. The 1963 addition, despite its design by a locally prominent architect, does not embody the distinctive characteristics of a type, period, region, or method of construction, or possess high artistic values.

Overall, the property is individually eligible for the California Register under Criterion 3 as a work by prominent architect Julia Morgan and for its early twentieth century design. Contributing elements that support the significance of the property include the main building, original landscaping features of the front lawn, and the stone cottage. The later additions to the main building are not considered significant under Criterion 3 (Architecture). The presence of these additions does not impact the significance of the main building; a further discussion of the integrity of the main building is included in the following section.

Criterion 4 (Information Potential)

The "potential to yield information important to the prehistory or history of California" typically relates to archeological resources, rather than built resources. When California Register Criterion 4 (Information Potential) does relate to built resources, it is relevant for cases when the building itself is the principal source of important construction-related information. The analysis of the property at 3400 Laguna Street for eligibility under Criterion 4 is beyond the scope of this report.

PERIOD OF SIGNIFICANCE

The overall period of significance for the property at 3400 Laguna Street, under both Criterion 1 and Criterion 3, is 1925 to 1957, beginning with the construction of the main building and ending with the merger of the San Francisco Ladies' Protection and Relief Society and the Crocker Old People's Home.

INTEGRITY

In order to qualify for listing in any local, state, or national historic register, a property or landscape must possess significance under at least one evaluative criterion as described above and retain integrity. Integrity is defined by the California Office of Historic Preservation as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance," or more simply defined by the National Park Service as "the ability of a property to convey its significance."[50]

Page & Turnbull used established integrity standards outlined by the *National Register Bulletin: How to Apply the National Register Criteria for Evaluation,* to evaluate whether the subject property retains sufficient integrity to convey its historic significance. Seven variables, or aspects, that define integrity are used to evaluate a resource's integrity—location, setting, design, materials, workmanship, feeling, and association. A property must possess most, or all, of these aspects in order to retain overall integrity. If a property does not retain integrity, it can no longer convey its significance and is therefore not eligible for listing in local, state, or national registers.

The seven aspects that define integrity are defined as follows:

[50] California Office of Historic Preservation, *Technical Assistance Series No. 7: How to Nominate a Resource to the California Register of Historical Resources* (Sacramento: California Office of State Publishing, 4 September 2001) 11; U.S. Department of the Interior, National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (Washington, D.C.: National Park Service, 1995) 44.

Location is the place where the historic property was constructed or the place where the historic event occurred;

Setting addresses the physical environment of the historic property inclusive of the landscape and spatial relationships of the building(s);

Design is the combination of elements that create the form, plan, space, structure, and style of the property;

Materials refer to the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form the historic property;

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory;

Feeling is the property's expression of the aesthetic or historic sense of a particular period of time; and

Association is the direct link between an important historic event or person and the historic property.

LOCATION

The property at 3400 Laguna Street retains integrity of location, as none of the buildings have been moved.

SETTING

The property's surrounding environment has not changed substantially to an extent that would compromise integrity of setting. The adjacent blocks to the west and north remain open space, and the surrounding blocks to the south and east consist of low-scale residential properties. Within the original grounds of the property, the setting has been somewhat affected by the accretion of additions and the removal of original gardens to the rear of the main building. However, at the primary façade and within the front yard, few changes to the original design have been made, and integrity of setting is not affected. When the building was constructed in 1925, the area to the east included extensive grounds, with pathways, mature vegetation, and gridded plantings, stretching the full depth of the lot from Bay Street through to Francisco Street. The stone cottage was constructed in 1928-1929, within the period of significance, and amplified the English-inspired design of the property while minimally impacting the original openness of the site due to its small footprint and

massing. Construction of the 1957 addition, marking the end of the property's period of significance, removed these extensive grounds. The remaining landscaped areas are divided into two courtyards, formally landscaped with fountains and other areas of hardscaping. These changes affect the setting of the property, yet are not considered to have a detrimental enough impact to undermine the main building's largely intact setting at its primary façade along Laguna Street.

DESIGN

The property at 3400 Laguna Street also retains integrity of design. The 1925 Julia Morgan-designed main building has undergone relatively few alterations. Known alterations include the enclosure of the construction of a penthouse, stair, and elevator stack within the identified period of significance; enclosure of the primary entry vestibule (with no impact to original material); construction of an adjoining addition at the north wing in 1957; and addition of a loading dock and associated metal awning at the north facade. Although the addition at the north wing necessitated the removal of small portions of the main building, the main building retains its overall design as completed by Julia Morgan in 1925. Features that remain and demonstrate Morgan's original design, include but are not limited to the strong symmetry of the primary façade, terra cotta ornament, fenestration configuration and materials, brick construction, and dormers. Additional features that contribute to the significance of the property, include the original landscape features of the front yard area, and the stone cottage to the northeast of the main building that was constructed in 1928-1929. These three elements retain their historic relationship and placement within the parcel, allowing the historic design of the property to be understood.

MATERIALS

The property retains integrity of materials through the presence of the overwhelming majority of the character-defining features of the main residence, including its brick façade and terra cotta ornament; the retention of the front yard as a planted area that provides a transition between the street and the main building; and the retention of the original materials of the stone cottage on the site.

WORKMANSHIP

3400 Laguna Street retains integrity of workmanship. Components of the original 1925 design of the property, including the construction of the main building and layout of the front garden, and the early addition of the stone cottage (completed in 1929) retain evidence of their original construction techniques. The main residence, in particular, illustrates period workmanship through its integration of terra cotta ornament, multi-lite metal frame windows, and use of complex building forms with canted bays, oriel windows, dormers, and a pediment dormer.

FEELING

The property's continued use as a care facility for the elderly, as well as its current landscaped grounds (although not strictly historic in character), support the property's integrity of feeling, allowing it to convey the peaceful atmosphere that characterized the property during its period of significance.

ASSOCIATION

3400 Laguna Street retains integrity of association, because it remains in use as an eldercare facility; the use for which it was designed and constructed.

Overall, despite additions and alterations, 3400 Laguna Street retains sufficient overall integrity to continue to convey its historic appearance and historic significance.

CHARACTER-DEFINING FEATURES

For a property to be eligible for national or state designation under criteria related to type, period, or method of construction, the essential physical features (or character-defining features) that enable the property to convey its historic identity must be evident. These distinctive character-defining features are the physical traits that commonly recur in property types and/or architectural styles. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction, and these features must also retain a sufficient degree of integrity. Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials.

The following character-defining features have been identified for the property at 3400 Laguna Street:

Main Building

- Overall regular massing and intersecting hipped roof
- U-shaped plan, consisting of central volume, north and south wings at east façade, and projections at north and south façades
- Structural brick exterior walls
- Slate roof shingles
- Symmetrical arrangement of front façade, with central gabled parapet
- Historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows
- Projecting canted bays
- Hipped dormer windows at roof

- Operable, divided-lite windows retaining historic configurations
- Terra cotta details: window surrounds with vegetative motifs in segmental arches; decorative panels and entablatures at canted bays; belt course above second level windows; projecting cornice with buttons at eave; coping and finial at central gabled parapet; double arched door surround at primary entrance vestibule
- Arched ground-level door openings at ground level
- Stained glass windows at interior chapel
- Additional historic design features: narrow blind niche and recessed diamond and square details in brick
- Historic glazed doors within entrance vestibule
- Three brick chimneys
- Front double stairs with iron railing
- Towers and penthouse at east façade
- Rain catch baskets
- Historic features in publicly accessible interior areas include:
    - Tile floor
    - Central stairwell with trefoil railing
    - Fireplace mantel
    - Wood coffered ceiling

Front Lawn

- Iron fence on brick base along west, north, and south property lines
- Curvilinear pedestrian paths leading from front stairs to two gates along the Laguna Street fence, and two paths curving north and south from the main entrance; paths appear to have been resurfaced since the period of significance, thus circulation routes are character-defining rather than paving materials
- Lawns in front landscaped area

Stone Cottage

- One-story massing
- L-shaped footprint
- Steeply pitched hipped roof
- Rough stone exterior cladding
- Punched window openings with original wood sash casement and double hung windows

VII. CONCLUSION

Page & Turnbull finds that the property at 3400 Laguna Street appears to be eligible for listing in the California Register of Historical Resources as an individual resource. The property is significant under Criterion 1 for its significant associations with the San Francisco Ladies' Protection and Relief Society during the late nineteenth and first half of the twentieth centuries; and under Criterion 3 as an excellent example of institutional architecture designed by prominent architect Julia Morgan in 1925, with a 1929 stone cottage that was a complementary early addition to the property and further amplified the peaceful, English-inspired design by Morgan. The property's period of significance is 1925 to 1957, beginning with the development of the property and construction of the main building, and ending with the merger between the Ladies' Protection and Relief Society and another eldercare institution.

The property has experienced several interventions—most notably rear additions to the main building that were constructed in 1957 (designed by Warren C. Perry) and 1963 (designed by Gardner A. Dailey). The two rear additions do not contribute to the significance of the property either architecturally under Criterion 3, or in association with the Ladies' Protection and Relief Society under Criterion 1. While the additions are conspicuous changes within the site, Page & Turnbull finds that the original main building, the stone cottage, and the landscaped front lawn retain sufficient integrity to convey the historic and architectural significance of the property. Therefore, the property at 3400 Laguna Street appears to be a historic resource for the purposes of CEQA review.

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IX. APPENDICES

BUILDING PERMIT APPLICATIONS

Front and back pages of building permit applications currently on file with the San Francisco Department of Building Inspection. Cancelled and expired permits are not included.



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75 E. SANTA CLARA STREET, SUITE 900 SAN JOSE, CALIFORNIA 95113 TEL 408.535.7055

SUB-APPENDIX C.2
3400 LAGUNA STREET HISTORIC RESOURCE REVIEW

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San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

HISTORIC RESOURCE REVIEW

Record No.:	**2022-009819ENV**
Project Address:	**3400 LAGUNA ST**
Zoning:	RM-1 RESIDENTIAL- MIXED, LOW DENSITY Zoning District 40-X Height and Bulk District
Block/Lot:	0471/003
Staff Contact:	Justin Greving – (628)652-7553 Justin.greving@sfgov.org

HISTORIC RESOURCE IDENTIFICATION

PROJECT SPONSOR SUBMITTAL

To assist in the evaluation of the proposed project, the Project Sponsor has submitted a:

☒ Consultant-prepared Historic Resource Review report
Prepared by: Page & Turnbull, *3400 Laguna Historic Resource Evaluation, Part 1* (HRE Part 1, February 16, 2023)
Staff consensus with Consultant's report: ☒ **Agree** ☐ **Disagree**

Additional Comments: Planning Staff concurs with report provided by Page & Turnbull but disagrees with the determination that the small stone caretaker's cottage on the site isn't individually eligible for listing in the California Register. The Planning Department finds the Caretaker's Cottage to be individually eligible for listing in the California Register. See **Step A: Significance** for more information.

BUILDINGS AND PROPERTY DESCRIPTION

The site at 3400 Laguna is a 68,005 square foot parcel that encompasses a half block bounded by Laguna Street to the west, Bay Street to the north, and Francisco Street to the south. East of the site are 3- and 4-story single-family homes and apartment buildings. The following description provides an overview of prominent site features, buildings, and additions.[1] The most prominent building on the site, the Julia Morgan Building, was constructed in the Jacobethan Revival style by architect of merit Julia Morgan for the Ladies' Protection and Relief Society in 1925. The Julia Morgan Building is a three-story brick building with a U-shaped plan consisting of a central volume and north and south wings extending from the east façade and projections at the north and south elevations. The building has a hipped roof covered in slate shingles and a regular arrangement of dormers and three prominent brick chimneys. The building is unified in its appearance with decorative terracotta detailing that is visible in the arched window surrounds, on the

[1] Pp. 5-28 of the HRE Part 1 provides a detailed description of the site.

second story cornice line, above the canted first floor bays, and on the engaged columns of the main entrance. The Julia Morgan building has a highly symmetrical primary façade that faces west towards Laguna and features seven bays arranged around a centered gable parapet. Two canted one-story bays frame the main entrance to the building which is itself centered below a projecting second story canted bay window. The double arched door surround is the main entrance to the building and is embellished with the same terracotta detailing found on the rest of the façade. The Julia Morgan Building has a generous setback that contains an ornamental lawn with symmetrical curvilinear pathways that lead to the primary entrance. A low brick base with a simple iron fence frames the lawn and wraps around the north and south boundaries of the property.

The Julia Morgan Building is connected to three interconnected additions on the site that are sometimes referred to as separate buildings. For the purposes of this report, the three additions, the Perry Building, Perry Building Connector, and Health Center, are referred to as separate buildings even though they are all interconnected additions to the Julia Morgan Building. The northwest rear elevation of the Julia Morgan Building connects with the two-story rectangular Perry Building Connecter constructed in 1957 that runs parallel to Bay Street. The Perry Building Connecter in turn connects to the four-story Perry Building also constructed in 1957 that runs north south along the eastern end of the property. Lastly, the one-story Health Center constructed in 1963 and 1987 connects with the Perry Building towards the southeast and runs along Francisco Street. There is one other building on the site, the freestanding one-story stone Caretaker's Cottage constructed in 1928-1929 located in the northeast corner of the site just north of the Perry Building. There are three prominent landscaped areas on the site: the front lawn, center courtyard, and the rear courtyard. As mentioned above, the front lawn is located along Laguna Street and creates a generous setback for the primary façade of the Julia Morgan Building. The central courtyard is a paved and landscaped courtyard located in the center of the site framed by the rear elevations of the Julia Morgan Building, the Perry Building and Perry Building Connector, and the Health Center. East of the Perry Building is the rear courtyard that is made up of the rear yards of the adjacent properties to the east.

PRE-EXISTING HISTORIC RATING / SURVEY

☒ Category A – Known Historic Resource, per: Historic Resource Evaluation Response (April 19, 2017), prepared by Shelley Caltagirone for 2016-012057ENV, based on findings of the Historic Resource Evaluation (August 28, 2015), prepared by Page & Turnbull.
☐ Category B – Age Eligible/Historic Status Unknown
☐ Category C – Not Age Eligible / No Historic Resource Present, per: _____

Adjacent or Nearby Historic Resources: ☒ Yes ☐ No

The subject property is located in the Marina and occupies the western half of a residential block situated between Laguna and Octavia streets to the west and east, respectively, and Bay and Francisco streets to the north and south, respectively. Across Laguna Street to the west, 3400 Laguna faces the Moscone Recreation Center that contains the article 10 designated Marina Branch Library and the California Register-eligible Funston bleachers that are identified as contributors to the discontiguous Midcentury Recreation historic district. The Marina Branch Library is significant as an article 10 landmark under National Register Criterion A (events) as reflection of principles of the modern public library promoted by the American Library Association after World War II and under Criterion C (design/construction) as it represents an innovative

example of midcentury modern design in Northern California.[2] Although the entire parcel is designated as an article 10 landmark, the library building itself faces Chestnut Street and has no visual, aesthetic, or historical relationship with the subject property. The Funston bleachers are contributors to the California Register-eligible discontiguous Midcentury Recreation historic district. This historic district is eligible under California Register Criterion 1 (events) for its association with the 1947 bond measure that funded the single largest expansion of recreational facilities in San Francisco's history, and under Criterion 3 (architecture) for embodying the distinctive characteristics of a type and period, and as exemplifying the work of an architect of merit, William Gladstone Merchant.[3] The Funston bleachers are situated closer to the subject property along Bay Street but also do not have any meaningful visual or historic relationship with the subject property.

North of the subject property across Bay Street is the Fort Mason historic district and the Fort Mason Port of Embarkation historic district, two historic districts that are listed in both the National and California registers. The Fort Mason historic district is listed in the National Register under Criterion A for its role as a coastal defense for the Bay as far back as the Spanish and Mexican administration of Alta California up to the post-Spanish American War, and under Criterion C as a collection of military structures spanning over 100 years with various architectural styles reflecting the evolution of this army post.[4] When originally listed in the National Register in 1972, the Fort Mason historic district boundaries were focused on the earliest properties located at the northeast corner of the Fort Mason site. However, in 1979 the nomination was amended to include additional properties and the boundaries were expanded to encompass the entire Fort Mason property west of Van Ness Avenue, north of Bay Street, east of Laguna Street, and south of the San Francisco Bay. Although the 1979 nomination does not specifically mention a period of significance, contributing properties are constructed between 1855 and 1942. The Fort Mason Port of Embarkation historic district is a smaller collection of buildings near the water that is listed in the National Register and is also a National Historic Landmark eligible under Criterion A as one of the most important ports of embarkation for soldiers and supplies during World War II. Contributing features to the Port of Embarkation historic district include buildings, sites, and features along the waterfront and the period of significance spans from 1912-1945.

Planning department staff determined there are no adjacent historic resources immediately south or east of the project site. 3400 Laguna occupies the western half of a residential block situated between Laguna and Octavia streets to the west and east, respectively, and is surrounded to the east and south by residential properties that were constructed after closure of the 1915 Panama Pacific International Exposition. The remainder of the block contains a mixture of two- and three-story single-family homes and multifamily apartment buildings constructed during the mid-1920s designed in simplified vernacular variations of Mediterranean Revival, Mission Revival, and Edwardian architectural styles. A similar pattern of three- and four-story single-family homes and multifamily apartment buildings from the same construction period is found to the south and east of the subject property along Francisco and Octavia streets. Although there is some similarity between the nearby buildings given their close construction dates, planning department staff previously determined the residential blocks immediately adjacent to the subject property do not contain sufficient architectural merit or aesthetic cohesion to be considered a historic district given the variety of architectural styles and numerous additions and alterations that affect the cohesiveness of the neighborhood.[5] Although a portion of the Marina to the west of the subject property has California Register-

[2] Marina Branch Library Article 10 designation, Landmark No. 262, https://sfplanninggis.org/docs/landmarks_and_districts/LM262.pdf
[3] Excerpt from the Cayuga Clubhouse Historic Resource Evaluation prepared by Page and Turnbull, October 25, 2010,
[4] Erwin Thompson, "Fort Mason National Register of Historic Places Inventory – Nomination Form" Section 8, Significance.
[5] Case no. 2013.0874E, "Historic Resource Evaluation Response 1503-1507 Francisco Street," December 20, 2013.

eligible historic districts, Buchanan Street marks the eastern boundary of these districts and the immediate area surrounding the subject property does not rise to the level of architectural significance such that it would be part of the nearby historic district.[6]

CEQA HISTORICAL RESOURCE(S) EVALUATION

Step A: Significance

Individual Significance	Historic District / Context Significance
Property is individually eligible for inclusion in a California Register under one or more of the following Criteria: **Criterion 1** - Event: ☒ Yes ☐ No **Criterion 2** - Persons: ☐ Yes ☐ No **Criterion 3** - Architecture: ☒ Yes ☐ No **Criterion 4** - Info. Potential: ☐ Yes ☐ No Period of Significance: Julia Morgan Building: 1925-1957 (Criterion 1), 1925 (Criterion 3); Caretaker's Cottage: 1928-1957 (Criterion 1), 1928-1929 (Criterion 3)	Property is eligible for inclusion in a California Register Historic District/Context under one or more of the following Criteria: **Criterion 1** - Event: ☐ Yes ☒ No **Criterion 2** - Persons: ☐ Yes ☒ No **Criterion 3** - Architecture: ☐ Yes ☒ No **Criterion 4** - Info. Potential: ☐ Yes ☒ No Period of Significance: _____ ☐ Contributor ☐ Non-Contributor ☒ N/A

Analysis:
The planning department determined the historic resource status of the property at 3400 Laguna Street in the HRER Part I dated April 19, 2017 for Case No. 2016-012057ENV. This HRER Part I found the original Julia Morgan-designed building at 3400 Laguna Street to be eligible for listing in the California Register under Criterion 1 for its association with the San Francisco Ladies' Protection and Relief Society, one of the longest operating, if not the single longest operating eldercare service organizations in San Francisco, and under Criterion 3 as a representative work of architect of merit Julia Morgan, with a design that blends utilitarian needs with sophisticated aesthetics. The period of significance under Criterion 1 is 1925-1957, beginning with construction of the building and ending with the merger of the San Francisco Ladies' Protection and Relief Society and the Crocker Old People's Home. The period of significance under Criterion 3 is 1925, the year the building was completed.

The department determined that none of the later alterations, including the 1957 Perry Building and Perry Building Connecter, and 1963 and 1987 Health Center, contribute to the site. Furthermore, despite these alterations the site retains all seven aspects of integrity. This determination provided a list of character-defining features that has since been updated and is described in more detail below.

The updated HRE dated February 16, 2023 prepared by Page & Turnbull provided new information and an evaluation of the Caretaker's Cottage on the northeast corner of the site. Page & Turnbull determined a more accurate date of construction for the caretaker's cottage of 1928-1929 and identified a local Berkeley designer and contractor Ernest Higgins as the builder. Page and Turnbull did not find the Caretaker's Cottage rose to the level of being individually eligible even if it contributed to the character of the property.

The planning department finds the Caretaker's Cottage is of sufficient architectural merit and unique for San Francisco as an English-inspired stone cottage such that it is individually eligible for listing in the California Register under Criterion 3 as an excellent and unique example of this architectural style. The period of significance under

[6] More information about the Marina historic districts can be found at 2016-013786ENV, "Historic Resource Evaluation Response, 465 Marina Boulevard," December 4, 2017, and 2012.1448E "Historic Resource Evaluation Response, 1410 Jefferson Street," May 13, 2013.

Criterion 3 is 1928-1929 and reflects the Caretaker's Cottage date of construction. The structure is also eligible under Criterion 1 for its association with San Francisco Ladies' Protection and Relief Society with a period of significance from 1928-1957.

The department is still in concurrence with the findings that none of the additions or alterations to the site constructed on or after 1957 have taken on significance. The alterations that are not significant include the Perry Building and Perry Building Connector (the L-shaped two- and four-story addition designed by Warren C. Perry constructed in 1957), and the Health Center (the 1-story addition designed by Gardner Daily constructed in 1963, with later alterations designed by Spencer & Associates added in 1987), the central courtyard and fountains located east of the original Julia Morgan Building, and the rear courtyard located east of the Perry Building. The only significant landscape feature on the property is the front lawn that is considered a significant landscape feature of the Julia Morgan Building.

Therefore, the site at 3400 Laguna contains two individually eligible buildings and one important landscape feature, the Julia Morgan Building and front lawn, and the Caretaker's Cottage.

Step B: Integrity

The subject property has retained or lacks integrity from the period of significance noted in Step A:

Location:	☒ Retains	☐ Lacks	**Setting:**	☒ Retains	☐ Lacks
Association:	☒ Retains	☐ Lacks	**Feeling:**	☒ Retains	☐ Lacks
Design:	☒ Retains	☐ Lacks	**Materials:**	☒ Retains	☐ Lacks
Workmanship:	☒ Retains	☐ Lacks			

Analysis:
In order to be determined eligible for listing in the California Register, the subject property must be found to retain sufficient integrity to convey its historic significance under Criterion 1 and 3. Planning staff concurs with the consultant report's findings that the property retains all seven aspects of integrity. A brief summary of how the subject property meets the seven aspects of integrity is included here (see a more detailed analysis on pp. 69-71 of the HRE Part 1). The subject property retains integrity of location as none of the buildings have moved since they were constructed. The subject property retains integrity of setting as the surrounding environment has not changed such that it would compromise the integrity of setting with the adjacent blocks to the west and north still open space and the adjacent blocks to the south and east consisting of three- and four-story multifamily apartments and single-family homes. Within the subject property, the new additions that took place after 1957 removed some of the grounds to the rear of the Julia Morgan Building somewhat affecting the setting through the accretion of additions and removal of original gardens to the rear of the Julia Morgan Building. However, while these alterations affected somewhat the setting, the Julia Morgan Building's primary façade and the front lawn remain largely intact. The property retains integrity of design as the Julia Morgan Building and the Caretaker's Cottage have both undergone few alterations. The subject property retains integrity of materials through the retention of the majority of character-defining features of the Julia Morgan Building and Caretaker's Cottage. The subject property retains integrity of workmanship due to the retention and layout of the front lawn along with the construction type of the Julia Morgan Building and Caretaker's Cottage. Of particular note is the fine terracotta ornament of the Julia Morgan Building and the stonework of the Caretaker's Cottage. The subject property also retains integrity of feeling and association through its continued use as a care facility for the elderly with its historic buildings and front lawn that convey a peaceful atmosphere.

Therefore, the subject property retains integrity and is a historic resource individually eligible for listing in the California Register under Criterion 1 and 3.

Step C: Character Defining Features

Based on the above findings, the character-defining features of the subject property include the following:

Julia Morgan Building

- Overall regular massing and intersecting hipped roof
- U-shaped plan, consisting of central volume, north and south wings at east façade, and projections at north and south façades
- Structural brick exterior walls
- Slate roof shingles
- Symmetrical arrangement of front façade, with central gabled parapet
- Historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows
- Projecting canted bays
- Hipped dormer windows at roof
- Operable, divided-lite windows retaining historic configurations
- Terra cotta details: window surrounds with vegetative motifs in segmental arches; decorative panels and entablatures at canted bays; belt course above second level windows; projecting cornice with buttons at eave; coping and finial at central gabled parapet; double arched door surround at primary entrance vestibule
- Arched ground-level door openings
- Stained glass windows at interior chapel
- Additional historic design features: narrow blind niche and recessed diamond and square details in brick
- Historic glazed doors within entrance vestibule
- Three brick chimneys
- Front double stairs with iron railing
- Towers and penthouse at east façade
- Rain catch baskets
- Historic features in publicly accessible interior areas include:
  - Tile floor
  - Central stairwell with trefoil railing
  - Fireplace mantel
  - Wood coffered ceiling

Front Lawn of the Julia Morgan Building

- Iron fence on brick base along west, north, and south property lines
- Curvilinear pedestrian paths leading from front stairs to two gates along the Laguna Street fence, and two paths curving north and south from the main entrance; paths appear to have been resurfaced since the period of significance, thus circulation routes are character-defining rather than paving materials
- Lawns in front landscaped area

Caretaker's Cottage

- One-story massing
- L-shaped footprint
- Steeply pitched hipped roof

- Rough stone exterior cladding
- Punched window openings with fixed and casement windows

CEQA HISTORIC RESOURCE DETERMINATION

☒ Individually-eligible Historical Resource Present
☐ Contributor to an eligible Historical District / Contextual Resource Present
☐ Non-contributor to an eligible Historic District / Context / Cultural District
☐ No Historical Resource Present

NEXT STEPS

☒ Project Evaluation Required (see evaluation below)
☐ Categorically Exempt, consult:
☐ Design Advisory Team
☐ Current Planner

Historic Resource Identification: Principal Preservation Planner Review

Signature: Allison Vanderslice Date: 2/27/2024

Allison Vanderslice, *Principal Preservation Planner*
CEQA Cultural Resources Team Manager, Environmental Planning Division

CC: Jeff Horn, *Senior Current Planner*
Team 1-2, Current Planning Division

Megan Calpin, *Senior Environmental Planner*
Environmental Planning Division

Project Evaluation

Proposed Project:		Per Drawings Dated:
☒ **Demolition / New Construction**	☐ **Alteration**	1/10/2024

PROJECT DESCRIPTION

The proposed project would include interior renovation and exterior restoration of the three-story Julia Morgan Building. The proposed project would demolish portions of the existing additions on site including the two-story Perry Building Connector, and the one-story Health Center, and construct two new additions (the Bay Building and Francisco Building) in approximately the same locations as the demolished additions.[7] The four-story Bay Building would be an addition to the Julia Morgan Building and similar to the Perry Building Connector would connect directly with the north wing of the Julia Morgan Building but would have a larger footprint. The four-story Francisco Building would replace the Health Center and would connect directly with the Perry Building. The project would include renovation of the other buildings and additions on the site, including renovation and exterior additions to the four-story Perry Building, rehabilitation of the Julia Morgan Building and interior renovation of the Caretaker's Cottage. The center courtyard would be remodeled while the rear courtyard and front lawn would not change. The new additions and alterations to the existing additions would all still be interconnected as all existing structures (except the Caretaker's Cottage), are today. The Caretaker's Cottage would remain a standalone building on the site. The new additions would collectively contain approximately 58,382 square feet of institutional use and would each be 40 feet tall (with an additional 10 feet for the elevator penthouse).

PROJECT EVALUATION

The proposed project's conformance with the Secretary of the Interior's Standards:					
Standard 1 –Minimal Change:	☒ Yes	☐ No	☐ N/A	**Standard 6** – Repairment:	☒ Yes ☐ No ☐ N/A
Standard 2 –Maintain Character:	☒ Yes	☒ No	☐ N/A	**Standard 7** – Treatments:	☒ Yes ☐ No ☐ N/A
Standard 3 –Avoid Conjecture:	☒ Yes	☐ No	☐ N/A	**Standard 8** – Archeology:	☒ Yes ☐ No ☐ N/A
Standard 4 –Acquired Significance:	☒ Yes	☐ No	☐ N/A	**Standard 9** – Compatibility:	☒ Yes ☒ No ☐ N/A
Standard 5 –Building Techniques:	☒ Yes	☐ No	☐ N/A	**Standard 10** – Reversibility:	☒ Yes ☐ No ☐ N/A

Standard 1 - A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The proposed project does not propose a change in use and the existing facility will continue to be a residential care retirement community as it has been since opening in 1925. Aside from some minor repairs to the Julia Morgan Building, the proposed project does not require changes to the building's character-defining features in order to maintain its continued use as a nursing care facility. Furthermore, even if it is necessary to use a different primary entrance to meet ADA requirements given the slope of the pathways leading up to the Julia Morgan Building, the center entrance to the Julia Morgan Building will retain its appearance as a main entrance to the facility and will still function as an entrance.

[7] The three interconnected additions to the Julia Morgan Building are all referred to as "buildings" for the sake of clarity even though they are not separate buildings on the site.

Therefore, the proposed project is in conformance with Standard 1.

Standard 2 - The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

The proposed project will change the character of the property by constructing additions on the site that are taller and have larger footprints that the existing additions. The renovation and exterior addition to the Perry Building will have a minimal change on the overall features and spaces that characterize the property because for the most part they will modify this non-historic addition that is located along the western edge of the site. The Perry Building is the addition behind the Julia Morgan Building located along the rear of the property in a location that has minimal effect on the Julia Morgan Building. From Laguna Street the Perry Building is almost completely obscured by the Julia Morgan Building. Therefore, alterations and additions to the Perry Building will affect the setting minimally due to its existing location at the site's eastern edge at the rear of the property.

Construction of the new Bay Building in the approximate location of the Perry Building Connector will cause some alterations to the overall character of the property due to it being taller and having a larger footprint than the addition it will replace (Attachment 2: Heritage on the Marina, Site line studies of proposed project prepared by HKS, November 6, 2023, view H). The four-story massing of the Bay Building will be taller than the existing two-story massing of the Perry Building Connector and will therefore be more visually prominent on the site. Additionally, while the north elevation of the Julia Morgan Building and the Perry Building Connecter are aligned with each other, the Bay Building will have a larger footprint and its north elevation will project further north towards Bay Street. In order to provide some space between the massing the of Bay Building and the Julia Morgan Building, a glass hyphen that is slightly recessed from the north elevation of the Julia Morgan Building will provide a separation between the two buildings. As described below, a mitigation measure will require coordination with planning department preservation staff on the details of the glass separation to ensure the connection is sensitive to the brickwork, is visually transparent, and incorporates a slight reveal to as to give a slight aesthetic separation from the Julia Morgan Building.

The biggest change in the character of the property will take place along the southern portion of the site where the one-story Health Center is currently located. Demolition of the one-story Health Care Center and construction of the four-story Francisco Building will alter somewhat the setting of this portion of the site because the four-story massing will be a large new structure near the three-story Julia Morgan Building (Attachment 2: views A and B). However, the massing of the new Francisco Building will be set back from Laguna Street further than the existing Health Center so as to almost be aligned with the rear roof gable of the Julia Morgan Building's south elevation projection. Pushing this taller massing of the Francisco Building farther east means that the primacy of the Julia Morgan Building will be maintained. Although the Francisco Building will be taller than the Health Center it will still have a generous setback from Laguna Street and will be spaced apart from the Julia Morgan Building.

Despite these alterations to the property that will cause some changes to some of the features and spaces that characterize the property overall, the most prominent views of the Julia Morgan Building will only be slightly affected (Attachment 2: views D, E, F). The character-defining front lawn will remain intact, as will the overall massing and configuration of the Julia Morgan Building. Additionally, the new additions and alterations will connect with the Julia Morgan Building in the location already altered by the Perry Building Connector. Therefore, the character-defining features related to the Julia Morgan Building's overall form will

remain intact including its regular massing and intersecting fixed roof, U-shaped plan with north and south wings, not to mention all the decorative detailing on all elevations.

Therefore, there are elements of the proposed project that are in conformance with Standard 2 but other elements of the project that aren't entirely in conformance with this standard.

Standard 3 - Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

The proposed project does not propose any alterations to the identified character-defining features of the Julia Morgan Building or the Caretaker's Cottage that would be conjectural or would incorporate architectural elements from other buildings. The design of the new construction will not give the impression of a false sense of historical development and will be understood as contemporary additions.

Therefore, the proposed project is in conformance with Standard 3.

Standard 4 - Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

The subsequent additions to the subject property that were added over time have been evaluated and determined to not have taken on significance. Both the Perry Building and Perry Building connector, and the Health Center do not contribute to the significance of the subject property. Additionally, the central courtyard and fountains located east of the Julia Morgan Building and the rear courtyard located east of the Perry Building also have not taken on significance and are non-contributing features of the subject property. Therefore, demolition of the Perry Building Connecter and Health Center, and alteration and addition to the Perry Building and central courtyard is in conformance with Standard 4 because these portions of the site have not taken on significance.

The only part of the property that has taken on significance since the home originally opened in 1925 is the Caretaker's Cottage that was constructed in 1928-1929. The proposed project will retain the Caretaker's Cottage in its existing location and all its associated character-defining features will not be altered. The portions of the property that have taken on significance over time will be retained and preserved.

Therefore, the proposed project is in conformance with Standard 4.

Standard 5 - Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

A number of character-defining features of the Julia Morgan Building and Caretaker's Cottage reflect the distinctive features, finishes, and construction techniques that characterize the property. The distinctive features of the Julia Morgan Building include the structural brick exterior walls, slate roof shingles, operable divided-lite windows (including stained glass windows in the ground floor chapel area), terra cotta details, among others. Other distinctive features and finishes of the site include the iron fence on a brick base along the front lawn and the rough stone exterior cladding of the Caretaker's Cottage. The proposed project will retain and repair as necessary the distinctive features described in the list of character-defining features, and

will include any necessary repairs as part of the preservation treatment plan to be reviewed and approved by planning department preservation staff.

Therefore, the proposed project is in conformance with Standard 5.

Standard 6 - Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

As part of the proposed project the Julia Morgan Building will see some exterior repairs to the windows and brickwork. As described below, a mitigation measure will require coordination with planning department preservation staff to ensure the distinctive historic features will be repaired rather than replaced. This mitigation measure will require the project sponsor to submit a preservation treatment plan for the repair of distinctive features to planning department preservation staff for review and approval.

Therefore, the proposed project is in conformance with Standard 6.

Standard 7 - Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

The proposed project does not anticipate use of any chemical or physical treatments that would cause damage to any historic materials.

Therefore, the proposed project is in conformance with Standard 7.

Standard 8 - Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Archeological resources will be treated as part of a standard archeological mitigation measure outlined in the Initial Study to ensure that if archeological resources are disturbed, mitigation measures shall be undertaken.

Therefore, the proposed project is in conformance with Standard 8.

Standard 9 - New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The proposed project includes the demolition and alteration to several existing buildings on the property that function as additions to the Julia Morgan Building but have not taken on significance. Demolition of the Perry Building Connector and Health Center, and renovation and additions to the existing Perry Building does not cause the demolition of any historic materials that characterize the historic property.

In general, the proposed project will include additions and alterations to the overall site that are in locations that do not affect the integrity of the property and its environment. New construction is limited to locations where there have already been alterations, such as in the locations east and south of the Julia Morgan Building where there are currently non-historic additions and non-historic courtyards. The footprint of the new Bay Building will encroach in some areas that are currently occupied by the central courtyard in the middle of the property and the parking lot to the north of the property. Both areas are not considered character-defining features and do not contribute to the significance of the property. In a similar fashion, the new Bay Building will be located roughly on the footprint of the Health Center on a part of the property that has not taken on significance.

The new construction will connect with the Julia Morgan Building only at the point where there is already a connection, at the rear eastern end of the northern wing. This allows the retention of the Julia Morgan Building's character-defining "U-shaped" plan. Therefore, the footprint of the new construction is limited to areas that allows for the retention of the most important and historically significant portions of the site, including the Julia Morgan Building and its front lawn, and the Caretaker's Cottage.

Modifications to the Julia Morgan Building include some removal of non-historic features that currently detract from the character of the north elevation. The HVAC equipment and loading dock that projects from the Julia Morgan Building's north elevation will be removed.

The height of the new Francisco Building will be taller than the existing Health Center and will therefore be a four-story mass where there is currently only one story. The height of the new four-story Francisco Building will roughly match the height of the roof peak of the Julia Morgan Building. This additional height and massing will block somewhat the view of the Julia Morgan Building from certain vantage points along Francisco Street and will impose somewhat on the setting of the Julia Morgan Building at the southern portion of the property. However, it should be noted that the footprint of the new Bay Building does not extend as far west into the property as the existing Health Center and is instead aligned approximately with the rear roof gable of the south façade projection. As mentioned in Standard 2, this further setback on the new building will allow for increased visibility of the southern elevation of the Julia Morgan Building in some areas although the height of the new building presents a new mass in this location.

On a similar note, the massing of the new Bay Building at the northern side of the property extends into the existing parking lot. While this does not directly affect any of the identified character-defining features of the Julia Morgan Building, because the Bay Building is slightly taller than the roof peak of the Julia Morgan Building, this new massing does affect the setting of the original building in this location because it starts to encroach on the Julia Morgan Building's primacy from certain vantage points. To reduce the imposition of Bay Building's massing on the Julia Morgan Building, a two-story glass connecting hyphen will connect the Bay Building and the Julia Morgan Building. The materials, massing, and location of this glass hyphen will provide a sensitive connection to the Julia Morgan Building as well as a transition to the taller mass of the Bay Building. This glass hyphen will be slightly recessed behind the north elevation of the Julia Morgan Building so as to provide a reveal between the historic building and the new connection. The use of glass as a material for the hyphen will allow for a transparent wall at the only location where the proposed project actually touches the Julia Morgan Building. The glass hyphen will also be only two-stories tall so as to align with the bottom of the roof line of the Julia Morgan Building and allow for a more gradual transition to the higher four-story massing of the Bay Building.

The materials and fenestration of the new construction is contemporary but will not be incompatible with the regular rhythm of punched openings and brick façade of the Julia Morgan Building or the stone construction of the Caretaker's Cottage. The new construction will feature a ground floor finished in Roman style brick and upper floors of a pre-weathered metal panel system. The elevations are broken up into bays through the use of different colored panels and slight recesses in the elevations which helps reduce their overall monumentality by breaking up the elevation into discrete portions. The pattern of openings will also be primarily of vertically oriented punched openings with fixed and double casement windows. Overall, the use of solid materials such as metal panels and Roman brick, and regularly spaced punched openings of vertically oriented windows will be compatible with the character of the historic resource without mimicking it.

Despite these impositions on the massing of the Julia Morgan Building by the proposed new construction, it is important to note that the most important feature of the Julia Morgan Building's setting, the front lawn, will remain intact. The most important views of the Julia Morgan Building demonstrate how the proposed project still allows for the Julia Morgan Building to retain its prominence on the larger site while the additions recede into the background as is the case with the Bay and Francisco buildings, or are entirely invisible as with the renovated Perry Building (see Attachment 2: views E, M). The front lawn affords the most important views of the Julia Morgan Building from vantage points along Laguna Street from Bay to Francisco streets and provides the necessary setback to maintain the primacy of the Julia Morgan Building on the site. Additionally, the location of the front lawn and its relationship to the Julia Morgan Building reinforces the importance of the site's primary entrance that is located directly in the center of the Julia Morgan Building's west elevation, a building that is itself centered in the middle of the front lawn. The additions to the property will not interrupt the symmetrical and hierarchical aspects of the property along Laguna Street, from the front lawn and its curvilinear pathway, to the primary entrance centered on the Julia Morgan Building.

Therefore, while there are elements of the project that are in conformance with Standard 9, there are other elements that aren't entirely in conformance with this standard.

Standard 10 - New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Because the location of the new additions and alterations will take place on portions of the property that have not taken on significance, the new construction does not affect any parts of the property that relate to its significance. The additions will connect with the Julia Morgan Building in the location where there already is an existing connection thus reducing the physical alterations required to connect the Julia Morgan Building with the new construction. Other areas of the property, such as the front lawn and Caretaker's Cottage will also not be affected by the new construction. If in the future, the proposed project were to be removed, the Julia Morgan Building and front lawn, and Caretaker's Cottage would maintain their essential form and integrity and would be unimpaired.

Therefore, the proposed project is in conformance with Standard 10.

*See **Project Impact Analysis** and **Cumulative Impacts Analysis** comments for additional information.*

PROJECT DETERMINATION

Based on the Historic Resource Identification, the project's scope of work:

☐ **Will** cause a significant adverse impact to the **individual historic resource** as proposed.
☐ **Will** cause a significant adverse impact to a **historic district / context** as proposed.

☒ **Will not** cause a significant adverse impact to the **individual historic resource** as proposed.
☐ **Will not** cause a significant adverse impact to a **historic district / context** as proposed.

PROJECT IMPACT ANALYSIS

Based on the above evaluation of the project the planning department finds some aspects of the project are not entirely in conformance with the Secretary's Standards. However, the planning department finds that the proposed project, even if not entirely in conformance with all 10 standards, will not cause material impairment to the historic resource. The proposed massing of the new construction is such that it will be taller than the Julia Morgan Building in some areas and will appear to encroach on the Julia Morgan Building from some secondary perspectives. The massing of the new Bay Building will be most visible from along Francisco Street and at the intersection of Francisco and Laguna streets where currently the one-story Health Center will be replaced by the four-story Bay Building. Because of the increase in height at this location the new building will be much more prominent from this vantage point and will impose on the setting of the Julia Morgan Building from certain points of view (see Attachment 2: views A and B). However, the new construction will not block the Julia Morgan Building from these perspectives entirely even if the roof line of the Julia Morgan Building will be less visible from the street at certain perspectives. Because the new building will be set back from Laguna Street further than the existing Health Center, this deeper setback will reveal more of the Julia Morgan Building's south elevation from these perspectives.

The new Bay Building will be most visible from the intersection of Bay and Laguna streets and will thus have the biggest modification to the setting from this perspective. The Bay Building will be taller than the Julia Morgan Building and the Caretaker's Cottage and will have a massing that projects out farther towards Bay Street than the existing Perry Building Connector. While the new construction will be visible from the northern corner of the site, it will not compete with the primacy of the Julia Morgan Building and will not affect the generous setback that the front lawn provides for the Julia Morgan Building's most important elevation (see views D, E, and F).

As stated in review of the project for conformance with Standard 9, planning department staff determined that the design and materials of the new addition is compatible with the character of the historic resource and will not negatively affect the site overall.

Planning staff have also reviewed the proposed project and determined it would not cause material impairment to the Caretaker's Cottage. The immediate setting of the Caretaker's Cottage is already characterized by contemporary urban infill as the Caretaker's Cottage is currently situated just north of the Perry Building and is immediately west of the neighboring four-story multi-family residential building. Furthermore, the inward orientation of the Caretaker's Cottage, with its primary entrance facing away from Bay Street, makes the Caretaker's Cottage less of a public facing building than the Julia Morgan Building. While the new construction may intensify the built-up nature of the Caretaker's Cottage's immediate setting, it will not be a significant change from its existing condition.

Planning department staff have determined that while the new construction will cause some changes to the setting of 3400 Laguna, these changes do not rise to the level such that the individual historic resources on the site would no longer communicate their significance. While the massing of the new construction will be visible from some perspectives of the site, the property will still maintain the Julia Morgan Building's prominence along Laguna Street. The new construction is limited to areas away from the front lawn to preserve the setting of the Julia Morgan Building's primary façade. Additionally, the proposed project will include rehabilitation of the Julia Morgan Building that will repair some character-defining features and remove some non-historic alterations that have altered the Julia Morgan Building's north elevation. The character-defining features of the Julia Morgan Building and Caretaker's Cottage will be retained.

Although there will be construction on the site that will be more visible in locations where there are already non-historic additions and in some cases in locations currently dedicated to a parking lot, the larger effect of these additions on the Julia Morgan Building and Caretaker's Cottage is not such that the two individually eligible historic resources would no longer communicate their significance and eligibility for listing in the California Register. The Julia Morgan Building at 3400 Laguna would still convey its significant association under Criterion 1 with the San Francisco Ladies' Protection and Relief Society as well as its association under Criterion 3 as a representative work of Julia Morgan, an architect of merit who created a design that blended utilitarian needs with sophisticated aesthetics. Similarly, the stone Caretaker's Cottage would also continue to convey its association under Criterion 1 with the San Francisco Ladies' Protection and Relief Society and under Criterion 3 as an excellent and unique example of an English-inspired stone cottage. Although the proposed project will cause some changes to the property's overall setting, it is not to the level such that it would cause material impairment to the identified historic resource. After completion of the proposed project, the site at 3400 Laguna will still be eligible for listing in the California Register.

Planning department preservation staff continue to work with the project sponsor to ensure the proposed treatment of the Julia Morgan Building, including repair of the windows and brick repointing, along with any other necessary repairs, and the detail of the connecting hyphen is in conformance with the Secretary's Standards. These details will be reviewed and approved by planning department preservation staff in the preservation treatment plan.

Construction Impacts

Because the proposed project will take place on the site where historic resources are located, there is the potential for the construction to damage historic resources. Therefore, the department will require implementation *of Mitigation Measure M-CR-1b: Best Practices and Construction Monitoring Program for Historic Resources* to ensure best practices when construction takes place on a site that contains historic resources.

Off-Site Impacts

Adjacent Historic Resources
Historic resources that have been identified west of the subject property include the article 10 listed Marina Branch library and the California Register-eligible Funston bleachers that were identified as a contributor to the discontiguous Midcentury Recreation historic district. Historic resources identified north of the subject property include the Fort Mason historic district and the Fort Mason Port of Embarkation historic district. Because the proposed project includes infill of an urban site adjacent to these historic properties in a

manner that is consistent with the height and massing of the surrounding neighborhood, there are no anticipated offsite impacts to historic resources caused by this infill. All identified adjacent historic resources are surrounded by residential neighborhoods that contain single family homes and multifamily apartments that range between three and four stories. Additional construction that is compatible with the size and massing of the surrounding residential neighborhood does not have the potential to cause an indirect impact on any of the identified historic resources nearby.

There are no identified historic resources immediately south or east of the subject property. However, if in the future, any of the properties immediately south or west of the subject property were to be identified as historic resources, the urban infill of the proposed project that is compatible with the height and massing of the neighborhood would in no way have an indirect impact on the neighboring properties.

Vibration
Any potential vibration impacts caused by construction of the proposed project on adjacent buildings will be addressed in the noise and vibration section of the Initial Study.

MITIGATION MEASURES

Implementation of the following Mitigation Measures would reduce the project's impacts on character defining features to historic resources to less than significant.

Mitigation Measure M-CR-1b: Best Practices and Construction Monitoring Program for Historic Resources

Although construction-related damage to the subject property is unlikely, the project site contains historic resources. Therefore, implementation of best practices and construction monitoring are necessary to reduce potential direct impacts through construction-related damages.

Furthermore, given the close proximity of new construction to historic buildings on the site, this mitigation measure will include a requirement that the project sponsor coordinate with planning department preservation staff and submit for review and approval a preservation treatment plan with additional details about the glass hyphen that will connect the new Bay Building with the Julia Morgan Building, and additional information about rehabilitation of the Julia Morgan Building.

CUMULATIVE IMPACTS
The only identified project within the cumulative study area is the Marina Improvement and Remediation Project. Because 3400 Laguna Street has no aesthetic or historic relationship with the Marina, the proposed project at 3400 Laguna Street does not have the potential to combine with the Marina Improvement and Remediation Project to negatively affect historic resources. As a site containing two individually eligible historic resources, the proposed project's potential impact to historic resources is limited to the historic resources on the site and those immediately adjacent to the site. The planning department determined that the impact to resources on and adjacent to the site would be less than significant and would not combine with the projects in the cumulative study area to have an impact on any of the identified historic resources.

CONCLUSION

Planning Department staff find that the proposed project is in conformance with most of the Secretary's Standards but is not fully in conformance will all 10 standards. However, the proposed project will not cause material impairment to the identified historic resources such that they would no longer retain their eligibility for listing in the California Register. Additionally, the potential adverse impacts of caused by the proposed project's construction can be reduced through the implementation of Mitigation Measures as outlined above such that they would reduce the project's impacts on historic resources to less than significant (LSM). Therefore, the proposed project will have a less than significant impact on historic resources with the implementation of mitigation measures.

Project Evaluation: Principal Preservation Planner Review

Signature: Allison Vanderslice Date: 2/27/2024

Allison Vanderslice, *Principal Preservation Planner*
CEQA Cultural Resources Team Manager, Environmental Planning Division

CC: Jeff Horn, *Senior Current Planner*
Team 1-2, Current Planning Division

Megan Calpin, *Senior Environmental Planner*
Environmental Planning Division

HRR ATTACHMENTS:

- ☒ Figures 1-5: Existing property photos / Current conditions
- ☒ Attachment 1: HRE prepared by Page and Turnbull
- ☒ Attachment 2: Heritage on the Marina, Site line studies of proposed project prepared by HKS, November 6, 2023

EXISTING PROPERTY PHOTOS / CURRENT CONDITIONS



Figure 1: Aerial photo showing location of the original Julia Morgan Building, additions, and landscape features of the site.
1: Original Julia Morgan Building, three stories, constructed 1925
2. Perry Building Connecter, two stories, constructed 1957
3. Perry Building, four stories, constructed 1957
4. Health center, one story, constructed 1963 and 1987
5. front lawn
6. central courtyard
7. rear courtyard



Figure 2: View northeast of the primary façade of the Julia Morgan Building and front lawn (Source: San Francisco Planning Department).



Figure 3: View southeast of the property showing the north (left) and west (right) elevations of the Julia Morgan Building. Note the one-story Perry Building Connector is also visible at the left of the photo (Source: San Francisco Planning Department).



Figure 4: View east of the property showing the primary façade (west elevation) of the Julia Morgan Building (Source: San Francisco Planning Department).



Figure 5: View southeast of the north (left) and west (right) elevation of the caretaker's cottage. Note the neighboring property and Perry Building in the background (Source: San Francisco Planning Department).

SUB-APPENDIX C.3
3400 LAGUNA STREET JULIA MORGAN BUILDING AND CARETAKER'S COTTAGE CHARACTER-DEFINING FEATURES

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MEMORANDUM

DATE	August 1, 2024	PROJECT NUMBER	21286
TO	Frank Rockwood	PROJECT	3400 Laguna Street
OF	Rockwood Pacific, Inc. 36 Southwood Drive Orinda, CA 94563	FROM	Elisa Skaggs, Lex Campbell, Carolyn Kiernat
CC	M. Linde	VIA	Email

REGARDING: 3400 Laguna Street – Morgan Building Historic Features

BACKGROUND

This memorandum provides a description of the interior and exterior character-defining features of the historic Julia Morgan-designed building at 3400 Laguna Street as well as an assessment of the building's exterior condition and treatment recommendations.

CHARACTER-DEFINING FEATURES

The character-defining features of the Morgan Building include the following:

Exterior Building (Photos 1-38)

- Overall regular massing and intersecting hipped roof
- U-shaped plan, consisting of central volume, north and south wings at east façade, and projections at north and south façades
- Structural brick exterior walls
- Slate roof shingles
- Symmetrical arrangement of front façade, with central gabled parapet
- Historic fenestration pattern, consisting of evenly spaced window openings with hierarchy among basement, first story and second story windows and upper dormer windows
- Projecting canted bays
- Hipped dormer windows at roof
- Operable, divided-lite windows retaining historic configurations
- Terra cotta details: window surrounds with vegetative motifs in segmental arches; decorative panels and entablatures at canted bays; belt course above second level windows; projecting cornice with buttons at eave; coping and finial at central gabled parapet; double arched door surround at primary entrance vestibule

- Arched ground-level door openings at ground level
- Stained glass windows at interior chapel
- Additional historic design features: narrow blind niche and recessed diamond and square details in brick
- Historic glazed doors within entrance vestibule
- Three brick chimneys
- Front double stairs with iron railing
- Towers and penthouse at east façade
- Rain catch baskets

Exterior Site: Iron fence on brick base along west, north, and south property lines

Interior Building (photos 39-41)
The following features are located on the first floor of the Morgan Building in the lobby / reception area, library and reading room:

- Tile floor
- Central stairwell with trefoil railing
- Fireplace mantel
- Wood coffered ceiling

EXTERIOR CONDITIONS ASSESSMENT

On January 5, 2024, Page & Turnbull Inc. conducted a conditions assessment of the exterior walls, roof, and landscape at 3400 Laguna Street. The assessment was limited to the historic building constructed in 1925. Two additions constructed in 1957 and 1963 were excluded. The Caretaker's Cottage constructed in 1928-1929 was also excluded from the assessment. The objective of the investigation was to gain an understanding of the current conditions of the walls and roof and to make recommendations for maintenance and/or repair.

Page & Turnbull's field investigation was limited to visual observations and performed primarily from the ground level. A closer look at typical hipped roof conditions was obtained from an adjacent low-slope roof. Our observations and recommendations, along with photographs of specific existing conditions, are provided at the end of the memorandum.

OBSERVATIONS

The 1925 building has a U-shaped footprint with two wings that extend from the north and south ends of the east façade. The building is two-and-one-half stories over a partially exposed basement level and has an attic-story penthouse (Photos 1-3). The building is clad in brick with a 5-1 common bond. The walls terminate at a hipped roof that incorporates built-in gutters. The roof is punctuated by hipped roof dormers and a central low-sloped roof penthouse projecting from the east facing

roof pitch. Slate shingles cover the roof pitches, dormers, and penthouse walls. Specific observations of the walls, roof, and landscape conditions are summarized below. Observations are general or typical in nature unless stated otherwise.

Hipped Roof, Dormers, and Roof Drainage

- Slate tiles installed in a standard configuration cover the roofs and dormer walls (Photos 4-5). The tiles are uniformly installed with adequate side laps (min. 3 in. offset from the centerline of the above shingle) and appear to be predominantly intact. We did not observe any slippage or missing tiles. The tiles exhibit minor weathering.
- The roof tiles are incorporated into closed valleys and rakes with uniform cuts. The flashing is not visible.
- The penthouse walls terminate at a roof parapet covered with ornamental copper sheet metal coping free of loose or deformed components. In general, the coping appears intact and is in the early stages of developing a protective patina.
- Three brick masonry chimneys project from the roof surface (Photo 6). Painted steel angle braces provide additional lateral support for the chimneys. The brick pointing mortar appears intact and the white color suggests the mortar is newer than the original masonry mortar. The paint forms a uniform coating on the steel. There are no obvious signs of corrosion.
- The hipped roof incorporates sheet metal, built-in gutters behind a molded terra cotta parapet. The gutters that were visually accessible appear clear of debris with no evidence of standing water.
- The gutters drain through outlets connected to copper sheet metal down leaders (Photos 7-8). The down leaders feature ornamental terra cotta scuppers. Staining, biological growth, and mortar deterioration are visible on the brick walls at approximately half of the rain leader systems.
- A detached down leader seam was observed in one location on the north elevation. The same down leader is also detached from the wall (Photo 9).
- In one location on the south elevation of the north wing, a conductor and down leader are missing. The roof outlet drains directly onto the wall and deck below. (Photo?)

Brick and Terra Cotta Walls

- The brick walls consist of brick set in 5-1 common bond with terra cotta ornamentation.
- There is moderate erosion of the brick mortar joints. We observed isolated cracking and holes in the joints that can lead to moisture infiltration (Photo 10).
- On the east elevation and inside elevations of the wings (facing the courtyard), there is staining and biological growth on the brick at the base of the brick wall. The brick mortar at these locations exhibits more severe deterioration (Photo 11).
- At approximately three locations on the west elevation, there is isolated staining on the brick frieze area just below the terra cotta coping, which is also stained. The brick mortar is

deteriorated in these locations (Photos 12-14). This suggests the presence or prior presence of leakage in the roof drainage system.

- A central brick dormer that incorporates a brick front gabled wall has an open (> 1/16 in. wide) diagonal crack in the brick masonry. In other locations at the corners of the wall, there are bulges and slight displacement of some brick units (Photos 15-16).
- In one location on the west elevation, brick mortar joints were repointed or filled with white sealant. The sealant does not match the adjacent mortar (Photo 17).
- In general, most terra cotta ornamentation is free of defects such as cracking, spalling, and or displacement (Photo 18).
- There is significant deterioration of terra cotta parapet mortar joints (Photo 19-20). White staining that appears to be efflorescence is seen in isolated locations on the west and east elevations.
- Isolated terra cotta blocks (5-6 locations) found on the west elevation contain moderate glaze spalling (Photos 21-22).
- At two locations on the west elevation, horizontal joints above the terra cotta window arches are filled with white sealant. This appears to be a temporary remedy to protect exposed steel lintels that may be experiencing corrosion and expansion of the steel product (Photo 23).
- At the projecting bays on the west elevation, the mortar joints of the terra cotta window trim are cracked and deteriorated (Photo 24).

Concrete Foundation Wall

- A concrete foundation wall with cement plaster finish is visible in a basement stair well on the north elevation.
- The concrete wall contains some open cracks in the finish surface (Photo 25).

Steel Windows and Leaded Glass

- The painted steel casement windows generally are free of paint failure and material defects (e.g., peeling paint, corrosion, glazing failure) are in generally good condition. There are isolated occurrences of flaking paint and cracked glazing putty particularly on the south elevation (Photo 26). Window perimeter sealant joints are adhered and intact.
- There is minor surface corrosion on the lead cames of some leaded glass windows on the south elevation (Photo 27). The steel frames contain minor spot corrosion. The leaded glass panels are otherwise in good condition.

Wood and Metal Doors

- Painted wood and metal doors are free of paint and material defects (e.g., peeling paint, corrosion) and the doors generally are in good condition (Photo 28).
- There is minor wood checking and paint deterioration on an eight-lite wood door on the east elevation (Photo 29).

- A wood door on the east elevation is missing a sweep (weatherstripping) at the base of the door panel (Photo 30).
- The front door on the west elevation features a steel frame storefront system fitted with an aluminum door. There is minor cracking of the glazing putty and peeling paint on the steel frame (Photo 31).

Landscaping Components

- The courtyard behind the building features a brick paver patio and sidewalks around two concrete fountains (inoperable). Planting beds are found around the perimeter of the patio and sidewalks (Photo 32).
- The planters incorporate well maintained mature shrubs, ground covering, and trees.
- There are open cracks in the concrete paver trim. In isolated locations the trim is buckling due to settlement of the subsoil (Photo 33).
- In specific locations, the brick pavers are buckling and dislodged due to settlement of the subsoil (Photo 34).
- There are cracks in the fluid applied waterproofing applied to the walls and floors of the fountains (Photo 35).
- The front lawn features concrete sidewalks that intersect a grass lawn. Planting beds incorporate boxwood and azalea shrubs and flower planting beds. An iron fence set on a brick stem wall is found around the perimeter of the property adjacent to the public sidewalk (Photo 36).
- Components of the iron fence and gate contain isolated corrosion and blistered paint (Photos 37-38). There is scaling on some fence pickets leading to section loss.
- The brick stem wall contains minor biological growth on the surface but is otherwise in good condition.

INTERIOR AND EXTERIOR FEATURES AND TREATMENT RECOMMENDATIONS

The following is a list of interior and exterior features of the Julia Morgan building with treatment recommendations:

Exterior Feature + Condition	Treatment Recommendation
Hipped Roof, Dormers, and Roof Drainage	
Staining and biological growth adjacent to down leaders	Investigate conductors and leaders to locate leakage, reseal (solder and fasten) open joints.
Detached down leader	Reattach down leader to wall.
Missing down leader	Install new sheet metal down leader to match existing.
Brick and Terra Cotta Walls	
Erosion, cracking, and holes in mortar joints	Repoint deteriorated mortar joints to match composition and color of existing.
Staining and biological growth as base of wall, mortar deterioration	Relocate or adjust sprinklers so that they do not distribute water onto the wall. Repoint deteriorated mortar joints.
Staining at brick frieze	Investigate sheet metal gutter for leakage and repair. Repoint deteriorated mortar joints to match color and composition of existing.
Diagonal crack, masonry displacement	Investigate wall for loose masonry. Install masonry anchors as required and rout and point crack.
Non-matching sealant in mortar joints	Remove and replace sealant with mortar that matches the existing.
Deteriorated terra cotta mortar joints at parapet, staining	Investigate sheet metal gutter for leakage and repair. Repoint deteriorated mortar joints.
Glaze spalling	Patch/paint glaze spalls to match the color and texture of existing glaze.
Sealed horizontal joint at window lintels	Monitor joints for masonry cracking and displacement. If movement occurs, remove brick and clean and paint lintel with rust inhibiting coating. Replace brick to match existing.
Deteriorated terra cotta mortar joints at window trim	Repoint deteriorated mortar joints to match composition and color of existing.
Concrete Foundation Wall	

Open cracks	Rout and seal cracks. Paint to match existing wall.
Steel Windows and Leaded Glass	
Flaking paint	Remove loose paint and repaint to match existing.
Cracked glazing putty	Remove cracked glazing putty and reglaze. Paint to match existing.
Surface corrosion on lead cames	Remove corrosion using abrasive cleaning. Coat lead came with a clear rust inhibitive sealer.
Wood and Metal Doors	
Wood checking and paint deterioration	Patch wood using a wood filler. Remove loose paint and repaint to match existing.
Missing sweep (weatherstripping)	Replace sweep as required.
Flaking paint and cracked glazing putty	Remove cracked glazing putty and reglaze. Paint to match existing. Remove loose paint and repaint to match existing.
Landscaping Components	
Cracks and buckling of concrete paver trim	Investigate and correct settlement. Remove and reinstall concrete trim on level substrate to match existing.
Buckling and dislodged brick pavers	Investigate and correct settlement. Remove and replace pavers on level substrate.
Open cracks in concrete fountain waterproofing	Replace fluid applied waterproofing if fountains are refilled.
Corrosion and scaling of iron fence	Remove corrosion using abrasive methods. Repaint using rust inhibitive paint.

INTERIOR FEATURES TREATMENT RECOMMENDATIONS	
Interior Features The following features are located on the first floor of the Morgan Building in the lobby / reception area, library and reading room. All features will be retained and protected during construction.	
Tile floor	Retain and repair existing tile floor. Replace broken or missing tiles as needed to match original.

Central stairwell with trefoil railing	Retain existing central stair and railing. Clean, repair and refinish railing as needed.
Fireplace mantel	Retain existing fireplace mantel. Clean and patch as needed.
Wood coffered ceiling	Retain existing wood coffered ceiling. Repair and refinish as needed.

EXTERIOR PHOTOS



Photo 1: Overall view, West elevation



Photo 2: Overall view, southwest corner



Photo 3: Overall view, North elevation



Photo 4: Overview of hipped roof.

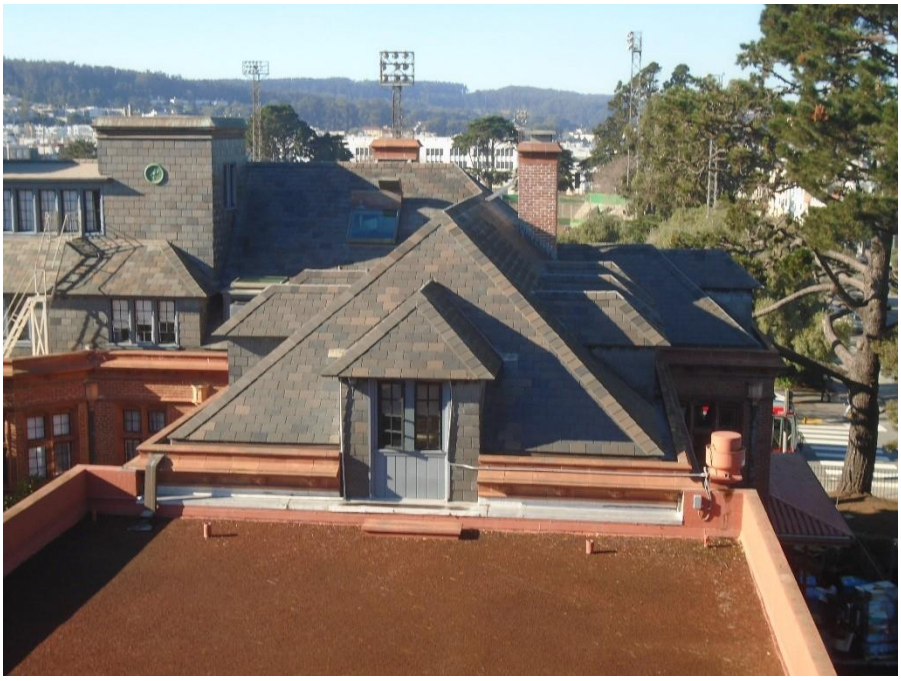


Photo 5: Hipped roof and built-in gutter.



Photo 6: Three brick chimneys projecting from roof.



Photo 7: Staining, biological growth, and mortar deterioration around down leader



Photo 8: Staining, biological growth, and mortar deterioration around down leader.



Photo 9: Detached down leader seam.



Photo 10: Isolated cracking and holes in mortar.



Photo 11: Staining and biological growth at wall base.



Photo 12: Brick mortar deterioration.



Photo 13: Brick mortar deterioration.



Photo 14: Brick mortar deterioration.



Photo 15: Crack in brick dormer.



Photo 16: Bulges in brick at central brick dormer.



Photo 17: Sealant does not match mortar.



Photo 18: Most terracotta ornamentation is free of defect.



Photo 19: Deterioration of terra cotta mortar joints at parapet.



Photo 20: Deterioration of terra cotta mortar joints a parapet.



Photo 21: Glaze spalling.



Photo 22: Glaze spalling.



Photo 23: Sealant over exposed steel lintel.



Photo 24: Mortar at trim cracked and deteriorated.

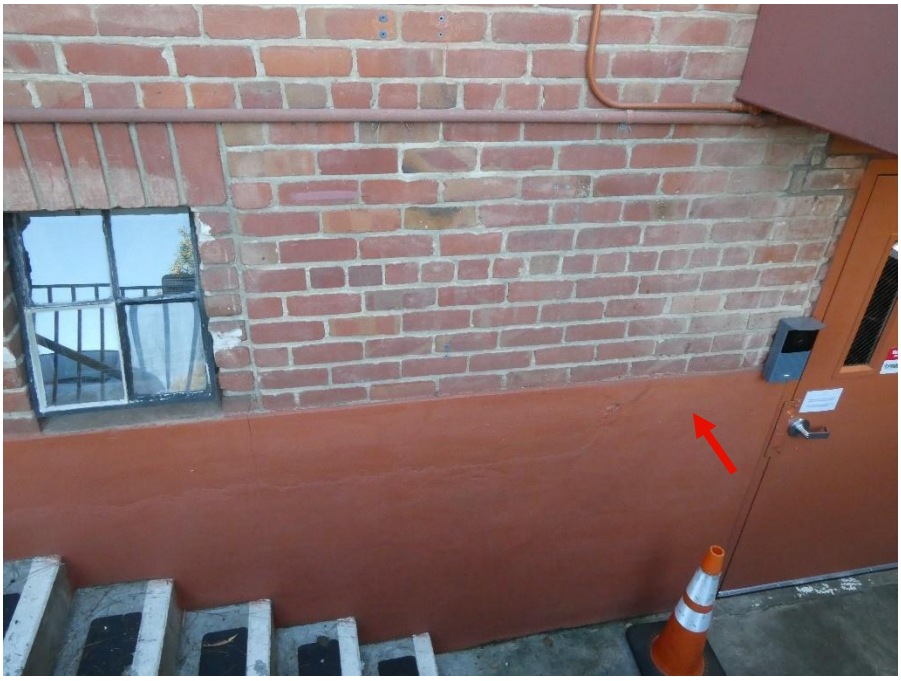


Photo 25: Cracks at finish surface.



Photo 26: Flaking paint and cracked glazing putty.



Photo 27: Minor surface corrosion on lead cames.

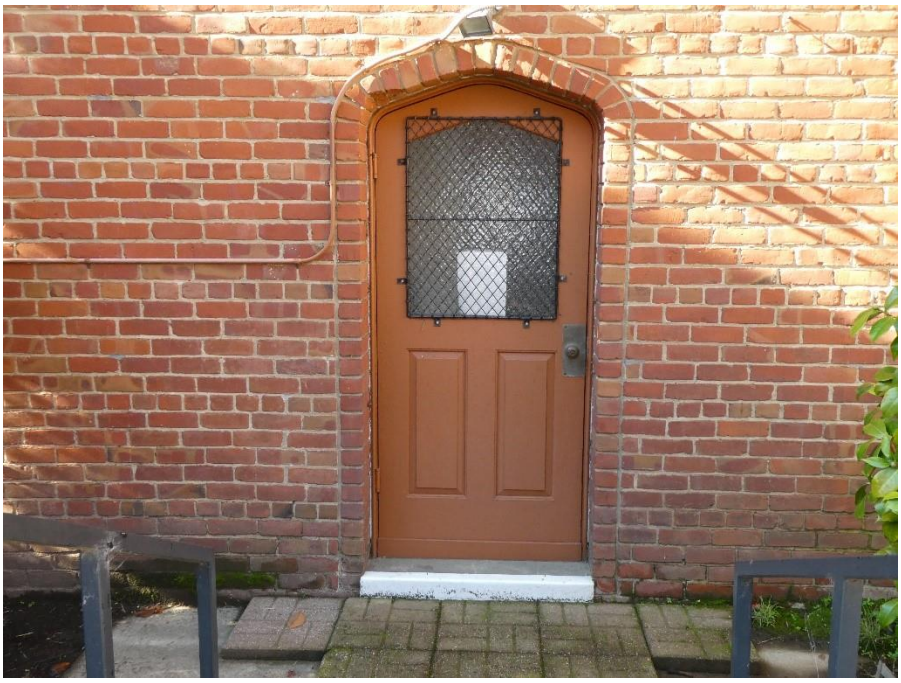


Photo 28: Door at courtyard.

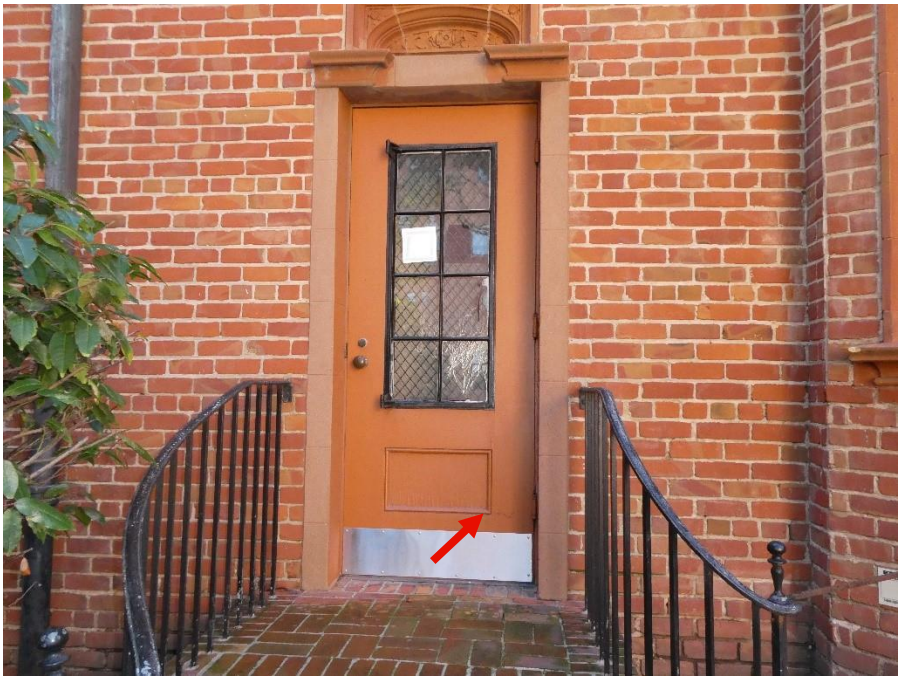


Photo 29: Minor wood checking.



Photo 30: Missing weatherstripping.



Photo 31: Peeling paint.



Photo 32: Planting beds at sidewalk perimeter.



Photo 33: Cracks and settlement of concrete trim.



Photo 34: Dislodging brick pavers from soil settlement.



Photo 35: Cracks in fluid applied waterproofing.



Photo 36: Front lawn.

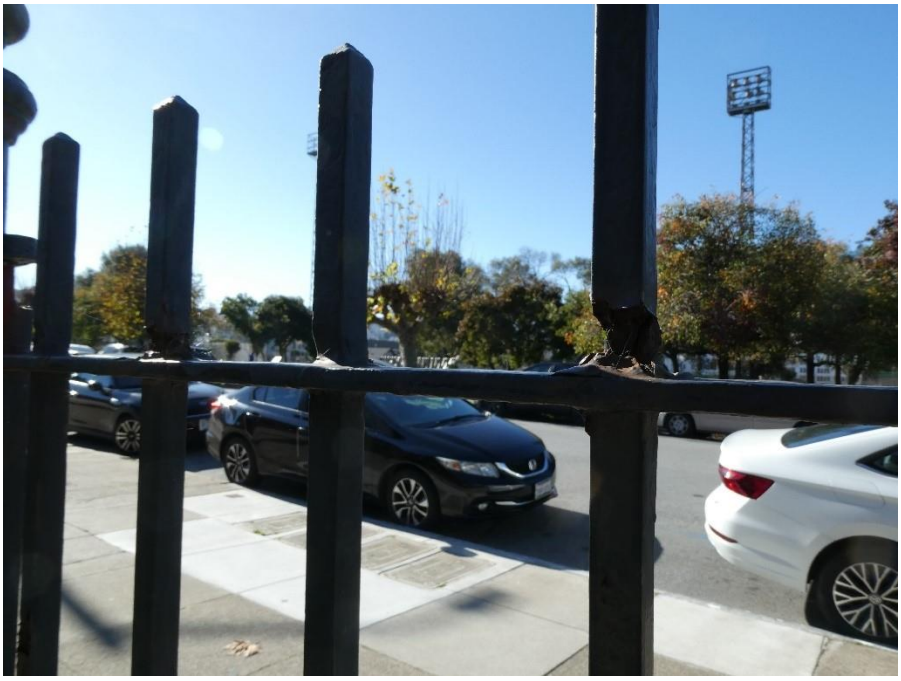


Photo 37: Corrosion at iron fence.



Photo 38: Corrosion at iron fence.

INTERIOR PHOTOS



Photo 39: Lobby and reception area, viewed facing south.



Photo 40: Sitting Room



Photo 41: Library and Reading Room

APPENDIX D
AIR QUALITY ANALYSIS AND SUPPORTING INFORMATION

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SUB-APPENDIX D.1
3400 LAGUNA STREET AIR QUALITY AND HEALTH RISK ASSESSMENT AND METHODOLOGY

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POINT RICHMOND
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SAN LUIS OBISPO

MEMORANDUM

DATE: October 25, 2023

TO: Jeanie Poling, Senior Planner/San Francisco Planning

FROM: Cara Cunningham, Associate
Theresa Wallace, AICP, Principal

SUBJECT: Scope of Work Memorandum for the 3400 Laguna Street/Heritage on the Marina Project (Case File No. 2022-009819PPA)

INTRODUCTION

LSA Associates, Inc. (LSA) is under contract to prepare an Environmental Impact Report (EIR) for the proposed 3400 Laguna Street/Heritage on the Marina Project (project). Per the San Francisco Planning Department's (department's) Air Quality Screening analysis (dated July 5, 2023), the proposed project would not exceed the criteria air pollutant screening levels in the Bay Area Air Quality Management District (BAAQMD) CEQA Guidelines; therefore, a quantitative assessment of criteria air pollutant impacts from project construction and operation would not be required. However, due to the construction activity as well as the proximity of nearby sensitive receptors and the project site location within the City's Air Pollutant Exposure Zone (APEZ), LSA understands that a construction health risk assessment (HRA) would be required for the proposed project. LSA has prepared this memorandum to outline a proposed scope of work, methodology, and data assumptions for review and approval for the preparation of the construction HRA. Our proposed approach and scope of work is based on a review of the project site plans and aerial map of the project site, and constitutes our understanding of the reports required by the department.

PROJECT UNDERSTANDING

The approximately 68,090-square-foot (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west.

The project site is occupied by the Heritage on the Marina residential care retirement community, which consists of five existing structures of approximately 83,200 gross square feet: the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage.

With development of the proposed project, the residential care facility would continue to operate on the project site. The proposed project would result in the demolition of two of the five existing

buildings (the Perry Connector and the Health Care Center) and construction of two new buildings (the Bay Building and the Francisco Building). The proposed project would result in the renovation of the other three existing buildings on the site. In total, the proposed project would add approximately 58,380 square feet of institutional use, and increase the number of residential care suites by 23 from 86 to 109.

Construction of the project would take approximately 29 months and is currently anticipated to occur between January 2027 and June 2029. The proposed new buildings would be constructed on mat foundations, and no impact or vibratory pile driving techniques would be used. The proposed project would require the excavation of 9,060 cubic yards of soil to a maximum depth of 15 feet. The total area of soil disturbance would be 29,750 square feet. Construction is scheduled for Monday through Friday, with no nighttime construction to occur.

Construction activity would use diesel-fueled equipment and would generate truck trips, which could increase concentrations of particulate matter and could expose nearby sensitive receptors to toxic air contaminants. Due to the construction activity as well as the proximity of the adjacent sensitive receptors and project site location within the City's APEZ, LSA understands that an HRA would be required.

SCOPE OF WORK

LSA will prepare three documents that together would comprise the construction HRA: 1) this scope of work memorandum; 2) a methodology memorandum; and 3) a results memorandum, which would include a list of modeling uncertainties/any conservative parameters used. The HRA will also include a project description and the following methodology and data assumptions.

Project Description and Receptors Analyzed

LSA will prepare a project description that will describe types and sources of pollutants that may be emitted from construction of the proposed project. The setting section will identify sensitive receptors and off-site workers and their proximity to the project site. The setting section will include graphics indicating the location of the project site and nearby receptor locations. Day care and school locations within 1,000 feet of the project site will also be identified.

Construction HRA

The following tasks will be conducted as part of the construction HRA:

- Confirm the receptor grid for construction prior to modeling, which will follow the Citywide Health Risk Assessment. Receptor heights, following those shown in the Citywide Health Risk Assessment technical support document, are shown in AERMOD output file data, which will be included as an appendix to the Methodology Memorandum.

- Coordinate with the department regarding the approach for the construction analysis.

- Construction emission sources will be modeled using utilizing BAAQMD, CAPCOA, and Environmental Planning Division guidance.

- Run the AERMOD air dispersion program. This will allow the use of the HARP health risk assessment post-processor to automatically process air dispersion modeling results that have been predicted using a unitized emission rate.

- Document the analysis and present the results, including mapping of the risk results, in the Construction HRA Results Memorandum.

If the department's thresholds are exceeded, LSA will work with the department to develop a set of practical, effective, and enforceable control measures to reduce identified impacts to a less-than-significant level, where possible. Control measures could include Tier 4 construction equipment, equipment electrification, and incorporating diesel particulate filters. All control measures will be quantified and reported in the Construction HRA Report. The results report will include methodology undertaken to determine the effectiveness of control measures.

SCHEDULE

Based on the City's review schedule timelines, LSA estimates that the HRA can be completed within timelines shown in Table 1, below. LSA will provide each document in clean and track changes versions.

Table 1: Proposed HRA Schedule

Milestone	Responsible Party	Weeks to Complete
Air Quality/Health Risk Assessment Scope of Work-1	LSA	1 week
Review of Air Quality/Health Risk Assessment Scope of Work-1	City	2 weeks
Revised Air Quality/Health Risk Assessment Scope of Work-2	LSA	3 days
Review of Air Quality/Health Risk Assessment Scope of Work-2	City	1 week
Final Air Quality/Health Risk Assessment Scope of Work	LSA	2 days
Air Quality/Health Risk Assessment Methodology Memo-1	LSA	1 week
Review of Air Quality/Health Risk Assessment Methodology Memo-1	City	4 weeks
Revised Air Quality/Health Risk Assessment Methodology Memo-2	LSA	1 week
Review of Air Quality/Health Risk Assessment Methodology-2	City	4 weeks
Final Air Quality/Health Risk Assessment Methodology Memo	LSA	1 week
Impact Preview Meeting with Air Quality Team	LSA/City	3 weeks
Draft Air Quality/Health Risk Assessment Results Memo-1	LSA	1 week
Review Draft Air Quality/Health Risk Assessment Results Memo-1	City	2 weeks
Revised Air Quality/Health Risk Assessment Results Memo-2	LSA	1 week
Review Air Quality/Health Risk Assessment Results Memo-2	City	1 week
Final Air Quality/Health Risk Assessment Modeling and Memo	LSA	1 week

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MEMORANDUM

DATE: March 20, 2024

TO: Megan Calpin, Senior Environmental Planner/San Francisco Planning

FROM: Cara Cunningham, Associate

SUBJECT: HRA Methodology Memorandum for the 3400 Laguna Street/Heritage on the Marina Project (Case File No. 2022-009819PPA)

INTRODUCTION

LSA Associates, Inc. (LSA) is under contract to prepare an Environmental Impact Report (EIR) for the proposed 3400 Laguna Street/Heritage on the Marina Project (project). Per the department's Air Quality Screening analysis (dated July 5, 2023), due to the construction activity as well as the proximity of nearby sensitive receptors and project site location within the City's Air Pollutant Exposure Zone (APEZ), LSA understands that a construction health risk assessment (HRA) would be required. LSA has prepared this memorandum to outline the methodology and data assumptions for review and approval for the preparation of the construction HRA.

The project's potential health risk impacts will be calculated using the California Emissions Estimator Model version 2022.1 (CalEEMod) and AERMOD. Model input assumptions were made using the information provided by the project sponsor and model defaults. LSA's proposed approach and scope of work is based on a review of the project site plans and aerial map of the project site, and constitutes our understanding of the requirements of the San Francisco Planning Department.

PROPOSED PROJECT

The approximately 68,005-square-foot (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west.

The project site is occupied by the Heritage on the Marina residential care retirement community, which consists of five existing structures of approximately 83,200 gross square feet: the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage.

With development of the proposed project, the residential care facility would continue to operate on the project site. The proposed project would result in the demolition of two of the five existing

buildings (the Perry Connector and the Health Care Center) and construction of two new buildings (the Bay Building and the Francisco Building). The proposed project would result in the renovation of the other three existing buildings on the site. In total, the proposed project would add approximately 58,380 square feet of institutional use, and increase the number of residential care suites by 23 from 86 to 109. The basement level of the new buildings would include 31 vehicular parking spaces, including one car-share space, and 18 bicycle parking spaces. In addition, the proposed project would replace an existing 25-year-old diesel emergency generator with a new Tier 4 diesel emergency generator of similar size.[1] Any change in emissions associated with the new generator would likely be lower than those associated with the existing generator and are not accounted for in this HRA.

Construction of the project would take approximately 29 months and is currently anticipated to occur between January 2027 and June 2029. The proposed new buildings would be constructed on mat foundations, and no impact or vibratory pile driving techniques would be used. The proposed project would require the excavation of 9,060 cubic yards of soil to a maximum depth of 15 feet. The total area of soil disturbance would be 29,750 square feet. Construction is scheduled for Monday through Friday**,** with no nighttime construction to occur.

The project characteristics are shown in Table A.

Table A: Project Characteristics

Land Use	Unit Amount	Lot Acreage	Square Feet	Landscape Area Square Feet
Residential Congregate Care (Assisted Living)	109 units	1.6	141,580	3,870
Enclosed Parking with Elevator	31 spaces	0	12,400*	0

* CalEEMod default data

METHODOLOGY AND DATA ASSUMPTIONS

Construction Modeling

Construction activities associated with the proposed project would generate emissions associated with demolition, site preparation, grading, soil hauling, and other construction activities on the project site. Construction equipment exhaust would also be a source of air pollution. Construction emissions will be estimated using the latest version of CalEEMod. CalEEMod is the latest air quality emissions model developed by the California Air Pollution Control Officers Association (CAPCOA) and recommended by the Bay Area Air Quality Management District (BAAQMD). CalEEMod incorporates California Air Resources Board (CARB) approved Off-Road and On-Road Mobile-Source Emission Factor models (OFFROAD and EMFAC, respectively) and is designed to estimate emissions for land use development projects. CalEEMod allows for the input of project-specific information and includes default assumptions for when project-specific information is not available. Emissions

[1] Charles Pankow Builders, LTD, Generator Letter, October 18, 2023.

modeling input data and assumptions for the project schedule, off-road construction equipment, grading and demolition activities, construction worker and truck trips, and asphalt paving are presented below. Where project-specific data is not available, default assumptions from CalEEMod will be used to estimate project emissions.

Anticipated Schedule

The project's construction schedule and phasing were based on project-specific data provided by the project sponsor and is shown in Table B.

Table B: Construction Schedule

Phase	Start Date	End Date	Days/Week	Total Days
Demolition	1/4/2027	3/1/2027	5	40
Site Preparation	1/4/2027	3/1/2027	5	40
Grading	2/4/2027	4/29/2027	5	60
Building Construction	4/6/2027	11/2/2027	5	150
Architectural Coating & Finishing	9/6/2027	7/7/2028	5	220
Paving	5/6/2028	6/30/2028	5	40

Internal building improvements are anticipated to continue through June 2029.

Off-Road Equipment

The project's off-road diesel-fueled construction equipment that will be used in the model are based on project-specific data provided by the project sponsor. Construction equipment that will be used in this analysis are shown in Table C.

Table C: Construction Off-road Equipment

Equipment Type	Unit Amount	Hours/Day	Horsepower (HP)	Load Factor
Demolition				
Rubber Tired Dozers	1	8	367	0.4
Crawler Tractors	1	8	300	0.43
Excavators	1	8	273	0.38
Rubber Tired Loaders	1	8	600	0.36
Sweepers/Scrubbers	1	8	36	0.46
Site Preparation*				
Graders	1	8	148	0.41
Tractors/Loaders/ Backhoes	1	8	84	0.37
Rubber Tired Dozers	1	7	367	0.4
Grading*				
Graders	1	8	148	0.41
Rubber Tired Dozers	1	8	367	0.4
Tractors/Loaders/ Backhoes	2	7	84	0.37
Building Construction				
Aerial Lifts	4	8	46	0.31

Table C: Construction Off-road Equipment

Equipment Type	Unit Amount	Hours/Day	Horsepower (HP)	Load Factor
Air Compressors	1	8	49	0.48
Bore/Drill Rigs	1	8	83	0.5
Cement and Mortar Mixers	1	8	10	0.56
Forklifts	1	8	82	0.2
Generator Sets	1	8	14	0.74
Pumps	1	8	11	0.74
Rough Terrain Forklifts	1	8	130	0.4
Sweepers/Scrubbers	1	8	36	0.46
Paving*				
Cement and Mortar Mixers	1	6	10	0.56
Pavers	1	6	81	0.42
Rollers	1	7	36	0.38
Tractors/Loaders/Backhoes	1	8	84	0.37
Paving Equipment	1	8	89	0.36
Architectural Coating*				
Air Compressors	1	6	37	0.48

* CalEEMod default data

Grading and Demolition

The proposed project would require approximately 9,060 cubic yards off-haul and demolition of the 14,000 square feet of existing buildings, which will be included in the CalEEMod analysis. In addition, this analysis will assume compliance with the San Francisco Construction Dust Control Ordinance; therefore, construction dust emissions will be excluded from the analysis.

Construction Trips

Construction trips and trip lengths were based on CalEEMod defaults and are shown in Table D.

Table D: Construction Trips and Trip Lengths

Phase	# One-Way Trips Worker/Day	# One-Way Trips Vendor/Day	# One-Way Trips Hauling/Day	Trip Length Worker (mi)	Trip Length Vendor (mi)	Trip Length Hauling (mi)
Demolition	12.5	0	4	11.7	8.4	20.0
Site Preparation	7.5	0	0	11.7	8.4	20.0
Grading	10	0	19	11.7	8.4	20.0
Building Construction	83.7	13.7	0	11.7	8.4	20.0
Paving	12.5	0	0	11.7	8.4	20.0
Architectural Coating & Finishing	16.7	0	0	11.7	8.4	20.0

* CalEEMod default data

On-Road Fugitive Dust

On-road fugitive dust assumptions in CalEEMod were based on default assumptions and are shown in Table E.

Table E: On-Road Fugitive Dust Assumptions

Phase	% Pave Worker	% Pave Vendor	% Pave Hauling	Road Silt Loading (g/m2)	Material Silt Content %	Material Moisture Content %	Average Vehicle Weight (tons)	Mean Vehicle Speed (mph)
Demolition	100	100	100	0.1	8.5	0.5	2.4	40
Grading	100	100	100	0.1	8.5	0.5	2.4	40
Building Construction	100	100	100	0.1	8.5	0.5	2.4	40
Paving	100	100	100	0.1	8.5	0.5	2.4	40
Architectural Coating	100	100	100	0.1	8.5	0.5	2.4	40

* CalEEMod default data

Based on the CalEEMod emission results, LSA will prepare a construction HRA, which will evaluate construction-period health risks to on-site and off-site receptors resulting from emissions from the proposed project due to diesel PM, and $PM_{2.5}$. The construction HRA will analyze $PM_{2.5}$ concentrations, cancer risk, and non-cancer chronic hazard index (chronic). The BAAQMD and California Air Pollution Control Officers Association (CAPCOA) have prepared detailed guidance for the air modeling required in HRAs. San Francisco also has prepared a Citywide Health Risk Assessment and technical support document modeling health risk throughout the city. LSA will follow these documents and analyses in completing this task. This assessment will be conducted using the air dispersion modeling performed using the United States Environmental Protection Agency (USEPA) dispersion model AERMOD. The model provides a detailed estimate of exhaust

concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data.

Health Risk Modeling

The HRA will be prepared using technical information and HRA guidance and protocol from the BAAQMD,[1] the CARB,[2] the California Office of Environmental Health Hazard Assessment (OEHHA),[3] and the 2020 Citywide HRA.[4] This HRA will evaluate the estimated incremental increase in lifetime cancer risks from exposure to emissions of diesel particulate matter (DPM) associated with combustion (i.e., exhaust) and the annual average $PM_{2.5}$ concentrations associated with combustion and fugitive sources including tire wear, brake wear, and resuspended road dust, that would be emitted by project-related construction sources. While DPM is a complex mixture of gases and fine particles that includes over 40 substances that are listed by the United States Environmental Protection Agency (USEPA) as hazardous air pollutants and by CARB as a toxic air contaminant, in accordance with HRA modeling guidelines, the HRA will use PM_{10} emissions as a surrogate for DPM emissions.[5, 6] Pollutant concentrations will be estimated using the USEPA dispersion model AERMOD. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data.

Consistent with the 2020 Citywide HRA, health risks from DPM and annual average $PM_{2.5}$ concentrations will be estimated at all sensitive receptors and off-site workers located within 1,000 feet of the proposed project's boundaries.

Additionally, the HRA will estimate existing plus project lifetime excess cancer risk and annual average $PM_{2.5}$ concentrations at the project's maximally exposed individual (MEI) by considering the

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1 Bay Area Air Quality Management District, Recommended Methods For Screening and Modeling Local Risks and Hazards, 2022, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en, accessed November 2023.

2 California Air Resources Board, Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values, last updated December 9, 2022, https://ww2.arb.ca.gov/sites/default/files/classic//toxics/healthval/contable.pdf, accessed October 2023.

3 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments, February 2015, http://oehha.ca.gov/air/hot_spots/hotspots2015.html, accessed October 2023.

4 San Francisco Department of Public Health, and San Francisco Planning Department, The San Francisco Citywide Health Risk Assessment: Technical Support Documentation, September 2020.

5 Office of Environmental Health Hazard Assessment, For the "Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant" Part B: Health Risk Assessment for Diesel Exhaust, May 1998 https://www.arb.ca.gov/toxics/dieseltac/part_b.pdf, accessed October 2023.

6 BAAQMD, Regulation 2 Permits Rule 5 New Source Review of Toxic Air Contaminants, 2016a, December 7, https://www.baaqmd.gov/~/media/dotgov/files/rules/reg-2-rule-5-new-source-review-of-toxic-air-contaminants/documents/rg0205_120716-pdf.pdf?la=en&rev=c1b53fb7e7bd41d3b9522796d3c4ccff, accessed October 2023.

proposed project's impact in aggregate with existing sources. The existing sources are attributable to the other mobile and stationary sources as modeled in the 2020 Citywide HRA.

Toxic Air Contaminant Concentrations

Inputs to the model will include general modeling parameters that account for atmospheric conditions, emission rates for each contaminant from the project sources, source parameters that characterize the activities generating emissions, variable phase durations to characterize construction schedule, and receptor characteristics (e.g., resident child, school-age child, childcare facility).

General AERMOD Parameters. General AERMOD modeling parameters are presented in Table F. Meteorological data from the Mission Bay (Site ID# 23234) monitoring site will be used. Digital terrain data from the Shuttle Radar Topography Mission (SRTM) will be used to assigned terrain heights every 20 meters, consistent with the receptor grid spacing that will be used in the air dispersion modeling. The SRTM data provides full coverage of the US in 1 by 1 degree blocks with an approximate resolution of 30 by 30 meters. Terrain elevation data was imported from Lakes Environmental and the AERMAP software will be used to process the digital terrain data into a format compatible with AERMOD.

Table F: Overall AERMOD Modeling Parameters

Pathway	Characteristic	Parameter
Control Pathway	Averaging Time	Period average
	Urban vs Rural	Urban
	Model Version	AERMOD v. 22119
Source Pathway	Spacing	See Table G
	Release Height	See Table G
	Initial Vertical Dimension	See Table G
	Initial Lateral Dimension	See Table G
Receptor Pathway	Receptor Height	1.5 meter
	Grid	20 m x 20 meters
Meteorological Pathway	Surface Data	Mission Bay (Site ID# 23234) monitoring site
	Upper Air	Oakland International Airport (Site ID# 23230)
	Station Elevation	2.4 meters

Sources:
Bay Area Air Quality Management District, Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards, August 2023, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en, accessed October 2023.
2. San Francisco Department of Public Health, and San Francisco Planning Department, The San Francisco Citywide Health Risk Assessment: Technical Support Documentation, September 2020.

Emission Rates. Emission rates of DPM along with exhaust and fugitive[1] $PM_{2.5}$ from the various emission sources (e.g., construction equipment) will be based on the anticipated hours of activity for

[1] Fugitive emissions include brake wear and tire wear obtained from EMFAC2021 and entrained paved road dust derived from Bay Area Air Quality Management District, Miscellaneous Process Methodology 7.9

each source and other information as described above. It will be assumed that all haul trucks and all vendor trucks are diesel heavy heavy-duty trucks (HHDT).

Each source will be modeled with a unitized emission rate of 1 gram/second (g/s). The modeled concentration at each receptor (micrograms per cubic meter [μ/m^3]/[g/s]) represents a "dispersion factor." The dispersion factor from each source will then be multiplied by its annual average emission rate to determine the annual average ambient pollutant concentration at every receptor from that source. Each source's resulting pollutant concentrations will be added together at each receptor to obtain the final result.

Annual average ambient air concentrations will be determined by multiplying the annual average dispersion factors by the annual average emission rates for each source. For simplicity, the model assumed a constant annual emission rate for each year.

Source Parameters. Table G presents AERMOD source configurations and parameters that will be used in the model. Construction sources will be modeled as an area source within AERMOD using the same release parameters used in the 2020 Citywide HRA, including a release height of 5 meters and an initial vertical dimension of 1.4 meters.

Haul truck and vendor trips associated with construction will be modeled as line-volume sources. The line-volume source width corresponds to the roadway width, while the modeled release height was 2.55 meters and the initial vertical dimension was 2.37 meters, consistent with the 2020 Citywide HRA modeling. Road dust generated from the truck trips will be modeled with a release height at ground level and an initial vertical dimension of 1 meter. This analysis only accounts for the locally emitted onsite emissions from the haul truck and vendor trips.

Onsite idling during construction from haul truck and vendor deliveries will be modeled as an area source with the same release height and initial vertical dimensions as the haul truck and vendor trips, which are 2.55 meters and 2.37 meters, respectively.[1]

Table G: AERMOD Source Modeling Parameters

Parameter	Off-Road Construction Equipment	On-Road Trucks	On-Road Vehicles	Mobile Sources	Loading Truck Idling
Source Type	Area	Line Volume	Line Volume	Line Volume	Point
Source Dimension	Project Area	Variable	Variable	Variable	n/a
Number of Sources	1	Variable	Variable	Variable	n/a
Release Height (m)	5	2.55	1.70	2.0	3.84
Initial Vertical Dimension (m)	1.4	2.37	1.58	2.3	n/a
Initial Lateral Dimension (m)	n/a	Variable	Variable	Variable	n/a

Entrained Road Travel, Paved Road Dust, March 2018, https://ww3.arb.ca.gov/ei/areasrc/fullpdf/full7-9_2018.pdf, accessed October 2023.

[1] This assumption reduces total fugitive $PM_{2.5}$ emissions to identify the $PM_{2.5}$ emissions that are locally emitted if considering full worker, vendor, and haul trips lengths, some of which are greater than 20 miles.

Table G: AERMOD Source Modeling Parameters

Parameter	Off-Road Construction Equipment	On-Road Trucks	On-Road Vehicles	Mobile Sources	Loading Truck Idling
Stack Diameter (m)	n/a	n/a	n/a	n/a	0.1
Temperature (K)	n/a	n/a	n/a	n/a	366
Velocity (m/s)	n/a	n/a	n/a	n/a	25
Hours per Day	9 (8am – 5pm)	9 (8am – 5pm)	9 (8am – 5pm)	9 (8am – 5pm)	15 min/hr/truck
Days per Week	5 (M-F)	5 (M-F)	5 (M-F)	5 (M-F)	5 (M-F)

Source: San Francisco Department of Public Health, and San Francisco Planning Department, The San Francisco Citywide Health Risk Assessment: Technical Support Documentation, September 2020.

Receptors. To represent on-site and off-site sensitive receptors and off-site workers near the project site, a modeling grid with receptors placed every 20-meters will be input to extend 1,000 feet from the project boundary in AERMOD; this is consistent with the receptor grid used in the 2020 Citywide HRA. Receptors will be placed at a height of 1.5 meters above terrain height, which represents the default breathing height for ground-floor receptors (i.e., human residents). Sensitive receptor locations include residential areas (based on residential land use and/or zoning data), childcare centers, and schools (for children under 16 years of age). Sensitive receptors and off-site workers are included in the receptor grid shown Figure 1.

Figure 1 – Project Site and Receptor Grid



Health Risks

Health risks from project-related sources will be estimated for construction activity including off-road construction equipment, paving, haul truck travel and idling, vendor trucks, and worker trips. The CARB Hotspots Analysis & Reporting Program (HARP) 2 Air Dispersion Modeling and Risk Tool will be used to calculate the health risks for the proposed project.

Pollutants Modeled. The TACs that will be modeled in the health risk assessment include DPM, modeled using exhaust PM_{10} as a surrogate, and $PM_{2.5}$ exhaust from off-road equipment, diesel truck travel and idling, and fugitive $PM_{2.5}$ from brake wear, tire wear, and entrained road dust from on-road truck travel on paved roads.

Exposure Assessment. Receptor types evaluated in the HRA will include existing on-site and off-site resident, childcare, school student, and worker receptors. Figure 1 above shows the location of the receptors included in the analysis.

Exposure Assessment. All exposure assumptions are presented in Table H and are based on OEHHA and BAAQMD risk assessment guidelines.

Table H: Exposure Parameters

Receptor Type	Age Group	Daily Breathing Rate (L/kg day or L/kg 8 hours)	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days per year)	Averaging Time (days)	Model Adjustment Factor	Age Sensitivity Factor
On-site Resident	Seniors	240	2.4	1	350	25,550	1	1
Off-site Resident	Third Trimester	240	0.25	1	350	25,550	1	10
	Age 0-2 Years	1,200	2	1	350	25,550	1	10
	Age 2-16 Years	520	2.4	1	350	25,550	1	3
	16-30	240	2.4	0.73	350	25,550	1	1
Off-site Childcare	Age 0-2 Years	1,200	2	n/a	350	25,550	4.2	10
	Age 2-9 Years	640	2.4	n/a	350	25,550	4.2	3
Off-site School	Age 2-16 Years	520	2.4	n/a	350	25,550	4.2	3
On-site and Off-site Workers	Age 16-41 Years	170	2.4	n/a	250	9,125	1	1

Sources:
1. Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for the Preparation of Health Risk Assessments, February 2015.
http://oehha.ca.gov/air/hot_spots/hotspots2015.html, accessed October 2023.
2. San Francisco Department of Public Health, and San Francisco Planning Department, The San Francisco Citywide Health Risk Assessment: Technical Support Documentation, September 2020.

Table H: Exposure Parameters

Receptor Type	Age Group	Daily Breathing Rate (L/kg day or L/kg 8 hours)	Exposure Duration (years)	Fraction of Time at Home	Exposure Frequency (days per year)	Averaging Time (days)	Model Adjustment Factor	Age Sensitivity Factor

3. Bay Area Air Quality Management District, Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards, August 2023. https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en, accessed October 2023.

Toxicity Assessment. The toxicity values used in the analysis for DPM will be from CARB/OEHHA.[1] This toxicity value is for carcinogenic (cancer) effects; the primary pathway for exposures is assumed to be inhalation. The incremental risks were determined for each TAC emission source and summed to obtain an estimated total incremental cancer health risk. Table I presents this value.

Table I: Carcinogenic Toxicity Values

Chemical/TAC	EMFAC Gasoline TOG Speciation (% TOG)	Inhalation Cancer Potency Factors (mg/kg-day)$^{-1}$	Weighted Inhalation Cancer Potency Factor
Diesel Exhaust (Diesel Vehicles)			
Diesel Particulate Matter	n/a	1.1	n/a
TOG Exhaust (Gasoline Vehicles)			
Acetaldehyde	0.28%	1.0E-02	2.80E-05
Benzene	2.47%	1.0E-01	2.47E-03
1,3-Butadiene	0.55%	6.0E-01	3.30E-03
Ethylbenzene	1.05%	8.7E-03	9.14E-05
Formaldehyde	1.58%	2.1E-02	3.32E-04
Naphthalene	0.05%	1.2E-01	6.00E-05
Weighted Total Toxicity Factor	—	—	6.28e-03
TOG Evaporative (Gasoline Vehicles)			
Benzene	0.36%	0.1	3.60E-04
Ethylbenzene	0.12%	8.70E-03	1.04E-05
Weighted Total Toxicity Factor	—	—	3.70E-04

Sources:
1. Bay Area Air Quality Management District, Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards, August 2023. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?rev=b8917a27345a4a629fc18fc8650951e4&sc_lang=en. Accessed October 2023.
2. California Air Resources Board. 2018. Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values. Last Updated: August 20, 2018. Available at: http://www.arb.ca.gov/toxics/healthval/contable.pdf. Accessed October 2023.

[1] California Air Resources Board, Consolidated Table of OEHHA/ARB Approved Risk Assessment Health Values. Last Updated: October 2, 2020, https://ww2.arb.ca.gov/sites/default/files/classic//toxics/healthval/contable.pdf, accessed October 2023.

Age Sensitivity Factors. Cancer risk estimates will be weighted by a factor of 10 for exposures that occur from the third trimester of pregnancy to 2 years of age and by a factor of three for exposures that occur from 2 years through 16 years of age.

Modeling Adjustment Factors. For exposure to construction emissions, since construction represents a non-continuous source, a modeling adjustment factor will be used for any school or childcare receptors to determine the long-term average daily concentration the school or childcare sensitive receptor may be breathing during their time at childcare or school. This is consistent with OEHHA (2015) protocol.

Construction is scheduled to occur Monday through Friday, from 7:00 a.m. to 8:00 p.m. Nighttime construction is not expected. This analysis assumes that construction activities will occur during an 8-hour period to coincide with when children are present in schools and childcare.

For school and childcare sensitive receptors, a model adjustment factor of 4.2 will be used (equation = [7 days / 5 days] * [24-hour residential exposure / 8 hours of exposure while at school/childcare] = 4.2).

Calculation of Intake. The dose estimated for each exposure pathway is a function of the concentration of a chemical and the intake of that chemical. The intake factor for inhalation will be calculated as follows using Equation 1.

$$\textbf{Equation 1: } IF_{inh} = \frac{DBR * FAH * EF * ED * MAF * ASF * CF}{AT}$$

Where:

IF_{inh} = Intake Factor for Inhalation (m^3/kg-day)
DBR = Daily Breathing Rate (L/kg-day)
FAH = Frequency of time at home (unitless)
EF = Exposure Frequency (days/year)
ED = Exposure Duration (years)
AT = Averaging Time (days)
MAF = Model Adjustment Factor (unitless)
ASF = Age Sensitivity Factor (unitless)
CF = Conversion Factor, 0.001 (m^3/L)

Calculation of Cancer Risk. Excess lifetime cancer risk is estimated as the upper-bound incremental probability that an individual will develop cancer over a lifetime as a direct result of exposure to carcinogens. Excess lifetime cancer risk is expressed as a unitless probability, and is calculated as the number of cancer incidences per million individuals. The cancer risk for each chemical is calculated by multiplying the chemical intake or dose at the human exchange boundaries (e.g., lungs) by the

chemical-specific cancer potency factor. Excess lifetime cancer risk occurs exclusively through the inhalation pathway and is calculated according to Equation 2, below.

Equation 2: $Risk_{inh} = C_i * IF_{inh} * CPF_i * CF_1 * CF_2$

Where:

$Risk_{inh}$ = Cancer risk; the incremental probability of an individual developing cancer as a result of inhalation exposure to a particular carcinogen (per million)

C_i = Average annual air concentration of chemical, from AERMOD (μ/m^3)

IF_{inh} = Intake Factor for Inhalation (m^3/kg-day)

CPF_i = Cancer potency factor for chemical (mg chemical/kg body weight-day)$^{-1}$

CF_1 = Conversion factor, micrograms to milligrams (mg/µg)

CF_2 = Risk per million individuals

i = Chemical

Risk from Existing Sources. The HRA will estimate the lifetime excess cancer risk and annual average $PM_{2.5}$ concentrations from existing TAC sources within 1,000 feet of the proposed project based on the Citywide HRA.

Risk Analysis. This analysis will evaluate the existing plus proposed project cancer risk and annual average $PM_{2.5}$ concentrations from the proposed project in order to identify the maximum lifetime excess cancer risks and annual average $PM_{2.5}$ concentration contributions from the proposed project and determine the project's contribution to existing health risks in the area.

Cumulative Analysis

The HRA will also qualitatively evaluate cumulative health risks associated with the proposed project and the background sources in the surrounding area at the on-site and off-site sensitive receptor locations. Cumulative development in the project vicinity includes only the Marina Improvement and Remediation Project. While it is not expected that the two projects would be constructed at the same time, cancer risk is the probability of getting cancer over a 30 year (or 25-year for workers) exposure period, and cumulative project emissions don't need to occur at the same time to combine to result in a cumulative cancer risk impact. Thus, the HRA will qualitatively evaluate the possibility of the project's cancer risk impact to increase impacts at the project MEI under cumulative conditions.

SUB-APPENDIX D.2
3400 LAGUNA STREET AIR QUALITY AND HEALTH RISK ASSESSMENT RESULTS

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CARLSBAD
CLOVIS
IRVINE
LOS ANGELES
PALM SPRINGS
POINT RICHMOND
RIVERSIDE
ROSEVILLE
SAN LUIS OBISPO

MEMORANDUM

DATE: May 13, 2024

TO: Megan Calpin, Senior Environmental Planner/San Francisco Planning

FROM: Cara Cunningham, Associate

SUBJECT: HRA Results Memorandum for the 3400 Laguna Street/Heritage on the Marina Project (Case File No. 2022-009819PPA)

INTRODUCTION

LSA Associates, Inc. (LSA) has prepared a construction Health Risk Assessment (HRA) for the proposed 3400 Laguna Street/Heritage on the Marina Project (project). This memorandum provides an analysis of the project's potential health risk impacts using the California Emissions Estimator Model version 2022.1 (CalEEMod) and AERMOD, which are attached to this memorandum. Emission calculation methodologies are discussed in the HRA Methodology Memorandum for the 3400 Laguna Street/Heritage on the Marina Project (Case File No. 2022-009819PPA) prepared by LSA, dated March 20, 2024.

PROPOSED PROJECT

The approximately 68,005-square-foot (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west.

The project site is occupied by the Heritage on the Marina residential care retirement community, which consists of five existing structures of approximately 83,200 gross square feet: the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage.

With development of the proposed project, the residential care facility would continue to operate on the project site. The proposed project would result in the demolition of two of the five existing buildings (the Perry Connector and the Health Care Center) and construction of two new buildings (the Bay Building and the Francisco Building). The proposed project would result in the renovation of the other three existing buildings on the site. In total, the proposed project would add approximately 58,380 square feet of institutional use, and increase the number of residential care suites by 23 from 86 to 109. The basement level of the new buildings would include 31 vehicular parking spaces, including one car-share space, and 18 bicycle parking spaces. In addition, the proposed project would replace an existing 25-year-old diesel emergency generator with a new Tier

4 diesel emergency generator of similar size.[1] Any change in emissions associated with the new generator would likely be lower than those associated with the existing generator and are not accounted for in this HRA.

Construction of the project would take approximately 29 months and is currently anticipated to occur between January 2027 and June 2029. The proposed new buildings would be constructed on mat foundations, and no impact or vibratory pile driving techniques would be used. The proposed project would require the excavation of 9,060 cubic yards of soil to a maximum depth of 15 feet. The total area of soil disturbance would be 29,750 square feet. Construction is scheduled to occur Monday through Friday, with no nighttime construction to occur.

CONSTRUCTION HEALTH RISK ASSESSMENT RESULTS

The modeled excess cancer risk and annual $PM_{2.5}$ concentrations at the maximally exposed on-site residents, off-site residents, off-site childcare receptors, off-site school receptors, and on-site and off-site workers are shown in Tables A and B. Chronic Hazard Index (HI) resulting from the proposed project is also disclosed below in Table C. The maximally exposed receptor is the receptor location with the maximum cancer risk, $PM_{2.5}$ concentration, and chronic HI from the proposed project. Model snap shots of the sources are attached. Background health risk data in these tables are from the San Francisco Planning Department's 2020 Citywide HRA database.

Table A: Existing Plus Project Lifetime Cancer Risk at Maximally Exposed Individual Receptors

Cancer Risk	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed project cancer risk (per 1 million)	**1.37**	**26.31**	**8.44**	**0.14**	**0.69**	**0.05**
Existing lifetime excess cancer risk (2020)[1] (per 1 million)	108.16	107.64	133.99	95.39	108.16	133.99
Existing + proposed project cancer risk (per 1 million)	**109.53**	**133.95**	**142.43**	**95.53**	**108.85**	**134.04**

Source: LSA (February 2024).
Notes:
[1] Background cancer risk at receptor from the 2020 Citywide HRA database.
APEZ = Air Pollutant Exposure Zone
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

[1] Charles Pankow Builders, LTD, Generator Letter, October 18, 2023.

As shown in Table A, the maximum cancer risk from the proposed project would be approximately 26.31 in one million at the maximally exposed individual (MEI) off-site residential receptor. The following construction control measure would reduce the cancer risk at all receptor types analyzed:

- The project sponsor shall ensure all off-road diesel-powered construction equipment of 25 horsepower or more meets the California Air Resources Board Tier 4 Final emissions standards or equivalent.

Table B: Existing Plus Project Annual Average $PM_{2.5}$ Concentration at Maximally Exposed Individual Receptors

$PM_{2.5}$ Concentration	**On-site Residential Receptor**	**Off-site Residential Receptor**	**Off-site Childcare Receptor**	**Off-site School Receptor**	**On-site Worker Receptor**	**Off-site Worker Receptor**
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed project annual average $PM_{2.5}$ concentration ($\mu g/m^3$)	**0.13**	**0.01**	**0.02**	**0.01**	**0.12**	**<0.01**
Existing annual average $PM_{2.5}$ concentration (2020)[1] ($\mu g/m^3$)	8.73	8.73	9.28	8.56	8.73	9.28
Existing + proposed project annual average $PM_{2.5}$ concentration ($\mu g/m^3$)	**8.86**	**8.74**	**9.30**	**8.57**	**8.85**	**9.28**

Source: LSA (February 2024).
Notes:
[1] Background $PM_{2.5}$ concentration at receptor from the 2020 Citywide HRA database.

APEZ = Air Pollutant Exposure Zone
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

As shown in Table B, the results of the analysis indicate that the maximum $PM_{2.5}$ concentration at the MEI would be 0.13 $\mu g/m^3$ at an on-site residential receptor.

Table C: Chronic Hazard Index at Maximally Exposed Individual Receptors

Chronic Hazard Index	**On-site Residential Receptor**	**Off-site Residential Receptor**	**Off-site Childcare Receptor**	**Off-site School Receptor**	**On-site Worker Receptor**	**Off-site Worker Receptor**
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed Project Chronic Hazard Index	**0.06**	**0.03**	**<0.01**	**<0.01**	**0.03**	**<0.01**

Source: LSA (May 2024).
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

Furthermore, the proposed project would result in a maximum chronic HI of 0.06 at the MEI, which is the on-site residential receptor.

Tables D, E, and F identify the results of the analysis with implementation of the construction control measures discussed above.

Table D: Existing Plus Project Lifetime Cancer Risk at Maximally Exposed Individual Receptors with Control Measures

Cancer Risk	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed project cancer risk (per 1 million)	**0.29**	**5.49**	**1.76**	**0.03**	**0.14**	**0.01**
Existing lifetime excess cancer risk (2020)[1] (per 1 million)	108.16	107.64	133.99	95.39	108.16	133.99
Existing + proposed project cancer risk (per 1 million)	**108.45**	**113.13**	**135.75**	**95.42**	**108.30**	**134.0**

Source: LSA (February 2024).
Notes:
[1] Background cancer risk at receptor from the 2020 Citywide HRA database.
APEZ = Air Pollutant Exposure Zone
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

As shown in Table D, with the identified control measure, the maximum cancer risk from the project would be 5.49 in 1 million at the off-site residential receptor.

Table E: Existing Plus Project Annual $PM_{2.5}$ Concentration at the Maximally Exposed Individual Receptors with Control Measures

$PM_{2.5}$ Concentration	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed project annual average $PM_{2.5}$ concentration ($\mu g/m^3$)	**0.02**	**0.02**	**0.01**	**<0.01**	**0.03**	**<0.01**
Existing annual average $PM_{2.5}$ concentration (2020)[1] ($\mu g/m^3$)	8.73	8.73	9.28	8.56	8.73	9.28
Existing + proposed project annual average $PM_{2.5}$ concentration ($\mu g/m^3$)	**8.75**	**8.75**	**9.29**	**8.56**	**8.76**	**9.28**

Source: LSA (February 2024).
Notes:
[1] Background $PM_{2.5}$ concentration at receptor from the 2020 Citywide HRA database.
APEZ = Air Pollutant Exposure Zone
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

With implementation of the identified control measure, Table E shows the maximum $PM_{2.5}$ concentration from the proposed project would be 0.03 $\mu g/m^3$ at the on-site worker receptor.

Table F: Chronic Hazard Index at Maximally Exposed Individual Receptors with Control Measures

Chronic Hazard Index	On-site Residential Receptor	Off-site Residential Receptor	Off-site Childcare Receptor	Off-site School Receptor	On-site Worker Receptor	Off-site Worker Receptor
Receptor coordinates (UTM X, UTM Y)	550120, 4184080	550140, 4184080	550240, 4184160	549760, 4183980	550120, 4184080	550240, 4184160
Proposed project Chronic Hazard Index	**0.01**	**0.01**	**<0.01**	**<0.01**	**0.01**	**<0.01**

Source: LSA (May 2024).
UTM = Universal Transverse Mercator
UTM X = eastward-measured distance
UTM Y = northward-measured distance

In addition, as shown in Table F, with implementation of the identified control measure, the proposed project would result in a maximum chronic HI of 0.01 at the MEI, which includes the on-site residential receptor, off-site residential receptor, and on-site worker receptor.

CUMULATIVE HEALTH RISK ASSESSMENT

This section presents information regarding potential cumulative health risks in combination with the existing plus project health risks at the project MEI. Below is a list of cumulative projects; however, because of the lack of available emissions data for the cumulative projects, cumulative health risks were not evaluated quantitatively. Table G lists the cumulative projects and provides a brief description, the expected risk sources associated with each project, and the distances from the project site.

Table G: Health Risks from Project Construction to Off-Site Receptors

Location	Project Name and Description	Potential Source of Health Risk	Distance from the Project Site (feet)
San Francisco Marina	**Marina Improvement and Remediation Project:** This project would redevelop the San Francisco marina into a waterfront park and implement environmental remediation.	diesel particulate matter (DPM) and $PM_{2.5}$ from construction equipment	750 feet

Source: LSA (February 2024).

The cumulative project would add an additional health risk impact from diesel powered construction equipment, contributing to greater cumulative health risks; however, the proposed project's contribution to the cumulative health risk would remain the same as under existing plus project conditions.

Attachments: A: CalEEMod Output Sheets
B: HRA Model Snapshots

ATTACHMENT A

CALEEMOD OUTPUT SHEETS

3400 Laguna Street/Heritage on the Marina Project Custom Report

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2.3. Construction Emissions by Year, Mitigated

3. Construction Emissions Details

3.1. Demolition (2027) - Unmitigated

3.2. Demolition (2027) - Mitigated

3.3. Site Preparation (2027) - Unmitigated

3.4. Site Preparation (2027) - Mitigated

3.5. Grading (2027) - Unmitigated

3.6. Grading (2027) - Mitigated

3.7. Building Construction (2027) - Unmitigated

3.8. Building Construction (2027) - Mitigated

3.9. Paving (2028) - Unmitigated

3.10. Paving (2028) - Mitigated

3.11. Architectural Coating & Finishing (2027) - Unmitigated

3.12. Architectural Coating & Finishing (2027) - Mitigated

3.13. Architectural Coating & Finishing (2028) - Unmitigated

3.14. Architectural Coating & Finishing (2028) - Mitigated

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.2.2. Mitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.3.2. Mitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.1.2. Mitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

5.18.2.2. Mitigated

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	3400 Laguna Street/Heritage on the Marina Project
Construction Start Date	7/6/2026
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	3.90
Precipitation (days)	41.8
Location	3400 Laguna St, San Francisco, CA 94123, USA
County	San Francisco
City	San Francisco
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1029
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.21

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Congregate Care (Assisted Living)	109	Dwelling Unit	1.60	141,580	3,870	—	254	—

Enclosed Parking with Elevator	31.0	Space	0.00	12,400	0.00	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

Sector	#	Measure Title
Construction	C-5	Use Advanced Engine Tiers

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.5	25.5	33.4	0.06	0.86	4.00	4.86	0.79	1.65	2.44	—	7,412	7,412	0.57	0.35	7,535
Mit.	9.83	11.5	35.5	0.06	0.17	4.00	4.18	0.17	1.65	1.82	—	7,412	7,412	0.57	0.35	7,535
% Reduced	6%	55%	-6%	—	80%	—	14%	79%	—	25%	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.5	43.4	47.2	0.10	1.73	6.12	7.85	1.59	2.72	4.32	—	12,296	12,296	0.80	0.39	12,432
Mit.	9.83	8.96	58.2	0.10	0.21	6.12	6.34	0.21	2.72	2.94	—	12,296	12,296	0.80	0.39	12,432
% Reduced	6%	79%	-23%	—	88%	—	19%	87%	—	32%	—	—	—	—	—	—
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.46	10.4	13.5	0.02	0.35	1.21	1.56	0.33	0.47	0.79	—	3,047	3,047	0.18	0.10	3,083

Mit.	3.39	4.59	15.4	0.02	0.07	1.21	1.29	0.07	0.47	0.54	—	3,047	3,047	0.18	0.10	3,083
% Reduced	2%	56%	-14%	—	79%	—	18%	78%	—	32%	—	—	—	—	—	—
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.63	1.89	2.46	< 0.005	0.06	0.22	0.29	0.06	0.09	0.15	—	504	504	0.03	0.02	510
Mit.	0.62	0.84	2.81	< 0.005	0.01	0.22	0.23	0.01	0.09	0.10	—	504	504	0.03	0.02	510
% Reduced	2%	56%	-14%	—	79%	—	18%	78%	—	32%	—	—	—	—	—	—

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	10.5	25.5	33.4	0.06	0.86	4.00	4.86	0.79	1.65	2.44	—	7,412	7,412	0.57	0.35	7,535
2028	9.67	4.98	8.50	0.01	0.16	0.24	0.40	0.15	0.06	0.21	—	1,375	1,375	0.05	0.01	1,380
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	10.5	43.4	47.2	0.10	1.73	6.12	7.85	1.59	2.72	4.32	—	12,296	12,296	0.80	0.39	12,432
2028	9.21	0.84	1.59	< 0.005	0.02	0.14	0.15	0.01	0.03	0.05	—	269	269	0.01	0.01	271
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	3.28	10.4	13.5	0.02	0.35	1.21	1.56	0.33	0.47	0.79	—	3,047	3,047	0.18	0.10	3,083
2028	3.46	0.77	1.33	< 0.005	0.02	0.06	0.08	0.02	0.01	0.03	—	219	219	0.01	< 0.005	220
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.60	1.89	2.46	< 0.005	0.06	0.22	0.29	0.06	0.09	0.15	—	504	504	0.03	0.02	510
2028	0.63	0.14	0.24	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	0.01	—	36.3	36.3	< 0.005	< 0.005	36.4

2.3. Construction Emissions by Year, Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	9.83	11.5	35.5	0.06	0.17	4.00	4.18	0.17	1.65	1.82	—	7,412	7,412	0.57	0.35	7,535
2028	9.29	1.99	8.77	0.01	0.03	0.24	0.27	0.03	0.06	0.09	—	1,375	1,375	0.05	0.01	1,380
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	9.83	8.96	58.2	0.10	0.21	6.12	6.34	0.21	2.72	2.94	—	12,296	12,296	0.80	0.39	12,432
2028	9.12	0.68	1.44	< 0.005	< 0.005	0.14	0.14	< 0.005	0.03	0.03	—	269	269	0.01	0.01	271
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	2.52	4.59	15.4	0.02	0.07	1.21	1.29	0.07	0.47	0.54	—	3,047	3,047	0.18	0.10	3,083
2028	3.39	0.40	1.32	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.02	—	219	219	0.01	< 0.005	220
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.46	0.84	2.81	< 0.005	0.01	0.22	0.23	0.01	0.09	0.10	—	504	504	0.03	0.02	510
2028	0.62	0.07	0.24	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	36.3	36.3	< 0.005	< 0.005	36.4

3. Construction Emissions Details

3.1. Demolition (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	2.35	17.5	18.2	0.05	0.70	—	0.70	0.64	—	0.64	—	5,725	5,725	0.23	0.05	5,745
Demolition	—	—	—	—	—	0.23	0.23	—	0.03	0.03	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.26	1.97	2.05	0.01	0.08	—	0.08	0.07	—	0.07	—	643	643	0.03	0.01	645
Demolition	—	—	—	—	—	0.03	0.03	—	< 0.005	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.36	0.37	< 0.005	0.01	—	0.01	0.01	—	0.01	—	106	106	< 0.005	< 0.005	107
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.37	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	103	103	< 0.005	< 0.005	104
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

Hauling	0.01	0.55	0.47	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	315	315	0.07	0.05	332
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.6	11.6	< 0.005	< 0.005	11.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.06	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.3	35.3	0.01	0.01	37.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.92	1.92	< 0.005	< 0.005	1.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.85	5.85	< 0.005	< 0.005	6.17

3.2. Demolition (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.55	3.53	28.5	0.05	0.11	—	0.11	0.11	—	0.11	—	5,725	5,725	0.23	0.05	5,745
Demolition	—	—	—	—	—	0.23	0.23	—	0.03	0.03	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.06	0.40	3.20	0.01	0.01	—	0.01	0.01	—	0.01	—	643	643	0.03	0.01	645

Demolition	—	—	—	—	—	0.03	0.03	—	< 0.005	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.07	0.58	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	106	106	< 0.005	< 0.005	107
Demolition	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.37	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	103	103	< 0.005	< 0.005	104
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.55	0.47	< 0.005	< 0.005	0.08	0.08	< 0.005	0.02	0.03	—	315	315	0.07	0.05	332
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.6	11.6	< 0.005	< 0.005	11.7
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.06	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	35.3	35.3	0.01	0.01	37.3
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.92	1.92	< 0.005	< 0.005	1.94
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	5.85	5.85	< 0.005	< 0.005	6.17

3.3. Site Preparation (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.19	10.4	11.6	0.02	0.47	—	0.47	0.43	—	0.43	—	2,065	2,065	0.08	0.02	2,072
Dust From Material Movement	—	—	—	—	—	2.44	2.44	—	1.17	1.17	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.13	1.17	1.30	< 0.005	0.05	—	0.05	0.05	—	0.05	—	232	232	0.01	< 0.005	233
Dust From Material Movement	—	—	—	—	—	0.27	0.27	—	0.13	0.13	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.21	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	38.4	38.4	< 0.005	< 0.005	38.5
Dust From Material Movement	—	—	—	—	—	0.05	0.05	—	0.02	0.02	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.22	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	61.7	61.7	< 0.005	< 0.005	62.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.95	6.95	< 0.005	< 0.005	7.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.15	1.15	< 0.005	< 0.005	1.17
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.4. Site Preparation (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.19	1.01	11.9	0.02	0.04	—	0.04	0.04	—	0.04	—	2,065	2,065	0.08	0.02	2,072

Dust From Material Movement	—	—	—	—	—	2.44	2.44	—	1.17	1.17	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.11	1.33	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	232	232	0.01	< 0.005	233
Dust From Material Movement	—	—	—	—	—	0.27	0.27	—	0.13	0.13	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.02	0.24	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	38.4	38.4	< 0.005	< 0.005	38.5
Dust From Material Movement	—	—	—	—	—	0.05	0.05	—	0.02	0.02	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.22	0.00	0.00	0.06	0.06	0.00	0.01	0.01	—	61.7	61.7	< 0.005	< 0.005	62.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	6.95	6.95	< 0.005	< 0.005	7.04
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.15	1.15	< 0.005	< 0.005	1.17
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.5. Grading (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.37	12.2	13.9	0.02	0.54	—	0.54	0.50	—	0.50	—	2,455	2,455	0.10	0.02	2,464
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.37	12.2	13.9	0.02	0.54	—	0.54	0.50	—	0.50	—	2,455	2,455	0.10	0.02	2,464
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	2.04	2.32	< 0.005	0.09	—	0.09	0.08	—	0.08	—	410	410	0.02	< 0.005	412
Dust From Material Movement	—	—	—	—	—	0.46	0.46	—	0.22	0.22	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.37	0.42	< 0.005	0.02	—	0.02	0.02	—	0.02	—	67.9	67.9	< 0.005	< 0.005	68.2
Dust From Material Movement	—	—	—	—	—	0.08	0.08	—	0.04	0.04	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.33	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	87.0	87.0	< 0.005	< 0.005	87.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.46	2.23	0.01	0.02	0.36	0.38	0.02	0.10	0.12	—	1,489	1,489	0.32	0.24	1,571
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.30	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	82.3	82.3	< 0.005	< 0.005	83.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.60	2.23	0.01	0.02	0.36	0.38	0.02	0.10	0.12	—	1,488	1,488	0.31	0.24	1,569
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.8	13.8	< 0.005	< 0.005	14.0

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.43	0.37	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	249	249	0.05	0.04	262
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.28	2.28	< 0.005	< 0.005	2.31
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.08	0.07	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	41.2	41.2	0.01	0.01	43.4

3.6. Grading (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	1.20	14.2	0.02	0.05	—	0.05	0.05	—	0.05	—	2,455	2,455	0.10	0.02	2,464
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.23	1.20	14.2	0.02	0.05	—	0.05	0.05	—	0.05	—	2,455	2,455	0.10	0.02	2,464
Dust From Material Movement	—	—	—	—	—	2.77	2.77	—	1.34	1.34	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.20	2.38	< 0.005	0.01	—	0.01	0.01	—	0.01	—	410	410	0.02	< 0.005	412
Dust From Material Movement	—	—	—	—	—	0.46	0.46	—	0.22	0.22	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.04	0.43	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	67.9	67.9	< 0.005	< 0.005	68.2
Dust From Material Movement	—	—	—	—	—	0.08	0.08	—	0.04	0.04	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.33	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	87.0	87.0	< 0.005	< 0.005	87.5
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.46	2.23	0.01	0.02	0.36	0.38	0.02	0.10	0.12	—	1,489	1,489	0.32	0.24	1,571
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.02	0.30	0.00	0.00	0.08	0.08	0.00	0.02	0.02	—	82.3	82.3	< 0.005	< 0.005	83.3
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.04	2.60	2.23	0.01	0.02	0.36	0.38	0.02	0.10	0.12	—	1,488	1,488	0.31	0.24	1,569
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.05	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	13.8	13.8	< 0.005	< 0.005	14.0

Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.01	0.43	0.37	< 0.005	< 0.005	0.06	0.06	< 0.005	0.02	0.02	—	249	249	0.05	0.04	262
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	2.28	2.28	< 0.005	< 0.005	2.31
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	< 0.005	0.08	0.07	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	41.2	41.2	0.01	0.01	43.4

3.7. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.05	10.1	13.8	0.02	0.30	—	0.30	0.27	—	0.27	—	2,259	2,259	0.09	0.02	2,267
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.05	10.1	13.8	0.02	0.30	—	0.30	0.27	—	0.27	—	2,259	2,259	0.09	0.02	2,267
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	4.16	5.72	0.01	0.12	—	0.12	0.11	—	0.11	—	935	935	0.04	0.01	938
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.08	0.76	1.04	< 0.005	0.02	—	0.02	0.02	—	0.02	—	155	155	0.01	< 0.005	155
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.15	2.74	0.00	0.00	0.69	0.69	0.00	0.16	0.16	—	728	728	0.01	0.01	732
Vendor	0.01	0.60	0.44	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	393	393	0.05	0.06	413
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.18	2.49	0.00	0.00	0.69	0.69	0.00	0.16	0.16	—	689	689	0.01	0.03	697
Vendor	0.01	0.63	0.45	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	393	393	0.05	0.06	412
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	1.01	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	285	285	0.01	0.01	289
Vendor	0.01	0.26	0.18	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	163	163	0.02	0.02	171
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.18	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	47.3	47.3	< 0.005	< 0.005	47.9
Vendor	< 0.005	0.05	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	26.9	26.9	< 0.005	< 0.005	28.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.8. Building Construction (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	7.03	15.5	0.02	0.11	—	0.11	0.10	—	0.10	—	2,259	2,259	0.09	0.02	2,267
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.48	7.03	15.5	0.02	0.11	—	0.11	0.10	—	0.10	—	2,259	2,259	0.09	0.02	2,267
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.20	2.91	6.40	0.01	0.05	—	0.05	0.04	—	0.04	—	935	935	0.04	0.01	938
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.53	1.17	< 0.005	0.01	—	0.01	0.01	—	0.01	—	155	155	0.01	< 0.005	155
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.15	2.74	0.00	0.00	0.69	0.69	0.00	0.16	0.16	—	728	728	0.01	0.01	732
Vendor	0.01	0.60	0.44	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	393	393	0.05	0.06	413

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.21	0.18	2.49	0.00	0.00	0.69	0.69	0.00	0.16	0.16	—	689	689	0.01	0.03	697
Vendor	0.01	0.63	0.45	< 0.005	< 0.005	0.10	0.10	< 0.005	0.03	0.03	—	393	393	0.05	0.06	412
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.08	0.07	1.01	0.00	0.00	0.28	0.28	0.00	0.07	0.07	—	285	285	0.01	0.01	289
Vendor	0.01	0.26	0.18	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	163	163	0.02	0.02	171
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.18	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	47.3	47.3	< 0.005	< 0.005	47.9
Vendor	< 0.005	0.05	0.03	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	26.9	26.9	< 0.005	< 0.005	28.2
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.9. Paving (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.43	4.13	6.47	0.01	0.15	—	0.15	0.13	—	0.13	—	991	991	0.04	0.01	995
Paving	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05	0.45	0.71	< 0.005	0.02	—	0.02	0.01	—	0.01	—	109	109	< 0.005	< 0.005	109
Paving	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.08	0.13	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.0	18.0	< 0.005	< 0.005	18.1
Paving	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.39	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	107	107	< 0.005	< 0.005	107
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.1	11.1	< 0.005	< 0.005	11.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.84	1.84	< 0.005	< 0.005	1.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.10. Paving (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.14	1.30	6.89	0.01	0.03	—	0.03	0.03	—	0.03	—	991	991	0.04	0.01	995
Paving	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.14	0.76	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	109	109	< 0.005	< 0.005	109
Paving	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.14	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	18.0	18.0	< 0.005	< 0.005	18.1
Paving	0.00	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.02	0.39	0.00	0.00	0.10	0.10	0.00	0.02	0.02	—	107	107	< 0.005	< 0.005	107
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.04	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	11.1	11.1	< 0.005	< 0.005	11.1
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.84	1.84	< 0.005	< 0.005	1.85
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.11. Architectural Coating & Finishing (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.83	1.13	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.03	0.19	0.26	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	30.6	30.6	< 0.005	< 0.005	30.7
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.05	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.06	5.06	< 0.005	< 0.005	5.08
Architectural Coatings	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.55	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	146	146	< 0.005	< 0.005	146
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.50	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	138	138	< 0.005	0.01	139
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	31.6	31.6	< 0.005	< 0.005	32.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.23	5.23	< 0.005	< 0.005	5.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.12. Architectural Coating & Finishing (2027) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.15	0.22	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	30.6	30.6	< 0.005	< 0.005	30.7
Architectural Coatings	2.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.03	0.04	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.06	5.06	< 0.005	< 0.005	5.08
Architectural Coatings	0.38	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.55	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	146	146	< 0.005	< 0.005	146
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.04	0.50	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	138	138	< 0.005	0.01	139
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.11	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	31.6	31.6	< 0.005	< 0.005	32.0
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.23	5.23	< 0.005	< 0.005	5.30
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.13. Architectural Coating & Finishing (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.81	1.12	< 0.005	0.02	—	0.02	0.01	—	0.01	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.04	0.30	0.41	< 0.005	0.01	—	0.01	0.01	—	0.01	—	49.4	49.4	< 0.005	< 0.005	49.6
Architectural Coatings	3.35	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.05	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.18	8.18	< 0.005	< 0.005	8.20
Architectural Coatings	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.52	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	143	143	< 0.005	< 0.005	144
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.47	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	135	135	< 0.005	0.01	137
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.17	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	50.2	50.2	< 0.005	< 0.005	50.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.31	8.31	< 0.005	< 0.005	8.34
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

3.14. Architectural Coating & Finishing (2028) - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.65	0.96	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	134	134	0.01	< 0.005	134
Architectural Coatings	9.06	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.24	0.36	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	49.4	49.4	< 0.005	< 0.005	49.6
Architectural Coatings	3.35	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	0.04	0.07	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	8.18	8.18	< 0.005	< 0.005	8.20
Architectural Coatings	0.61	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.52	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	143	143	< 0.005	< 0.005	144
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.04	0.03	0.47	0.00	0.00	0.14	0.14	0.00	0.03	0.03	—	135	135	< 0.005	0.01	137
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.17	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	50.2	50.2	< 0.005	< 0.005	50.4
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.31	8.31	< 0.005	< 0.005	8.34
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.4. Soil Carbon Accumulation By Vegetation Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.5. Above and Belowground Carbon Accumulation by Land Use Type - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.6. Avoided and Sequestered Emissions by Species - Mitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	1/4/2027	3/1/2027	5.00	41.0	—
Site Preparation	Site Preparation	1/4/2027	3/1/2027	5.00	41.0	—
Grading	Grading	2/4/2027	4/29/2027	5.00	61.0	—
Building Construction	Building Construction	4/6/2027	11/2/2027	5.00	151	—
Paving	Paving	5/6/2028	6/30/2028	5.00	40.0	—
Architectural Coating & Finishing	Architectural Coating	9/6/2027	7/7/2028	5.00	220	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Demolition	Crawler Tractors	Diesel	Average	1.00	8.00	300	0.43
Demolition	Excavators	Diesel	Average	1.00	8.00	273	0.38
Demolition	Rubber Tired Loaders	Diesel	Average	1.00	8.00	600	0.36
Demolition	Sweepers/Scrubbers	Diesel	Average	1.00	8.00	36.0	0.46
Site Preparation	Graders	Diesel	Average	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37

Site Preparation	Rubber Tired Dozers	Diesel	Average	1.00	7.00	367	0.40
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	7.00	84.0	0.37
Building Construction	Aerial Lifts	Diesel	Average	4.00	8.00	46.0	0.31
Building Construction	Air Compressors	Diesel	Average	1.00	8.00	49.0	0.48
Building Construction	Bore/Drill Rigs	Diesel	Average	1.00	8.00	83.0	0.50
Building Construction	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Building Construction	Forklifts	Diesel	Average	1.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Building Construction	Rough Terrain Forklifts	Diesel	Average	1.00	8.00	130	0.40
Building Construction	Sweepers/Scrubbers	Diesel	Average	1.00	8.00	36.0	0.46
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	6.00	81.0	0.42
Paving	Rollers	Diesel	Average	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.00	84.0	0.37
Paving	Paving Equipment	Diesel	Average	1.00	8.00	89.0	0.36
Architectural Coating & Finishing	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.2.2. Mitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Demolition	Crawler Tractors	Diesel	Tier 4 Final	1.00	8.00	300	0.43

Demolition	Excavators	Diesel	Tier 4 Final	1.00	8.00	273	0.38
Demolition	Rubber Tired Loaders	Diesel	Tier 4 Final	1.00	8.00	600	0.36
Demolition	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.46
Site Preparation	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	84.0	0.37
Site Preparation	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	7.00	367	0.40
Grading	Graders	Diesel	Tier 4 Final	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Tier 4 Final	1.00	8.00	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	2.00	7.00	84.0	0.37
Building Construction	Aerial Lifts	Diesel	Tier 4 Final	4.00	8.00	46.0	0.31
Building Construction	Air Compressors	Diesel	Tier 4 Final	1.00	8.00	49.0	0.48
Building Construction	Bore/Drill Rigs	Diesel	Tier 4 Final	1.00	8.00	83.0	0.50
Building Construction	Cement and Mortar Mixers	Diesel	Average	1.00	8.00	10.0	0.56
Building Construction	Forklifts	Diesel	Tier 4 Final	1.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Pumps	Diesel	Average	1.00	8.00	11.0	0.74
Building Construction	Rough Terrain Forklifts	Diesel	Tier 4 Final	1.00	8.00	130	0.40
Building Construction	Sweepers/Scrubbers	Diesel	Tier 4 Final	1.00	8.00	36.0	0.46
Paving	Cement and Mortar Mixers	Diesel	Average	1.00	6.00	10.0	0.56
Paving	Pavers	Diesel	Tier 4 Final	1.00	6.00	81.0	0.42
Paving	Rollers	Diesel	Tier 4 Final	1.00	7.00	36.0	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Tier 4 Final	1.00	8.00	84.0	0.37
Paving	Paving Equipment	Diesel	Tier 4 Final	1.00	8.00	89.0	0.36
Architectural Coating & Finishing	Air Compressors	Diesel	Tier 4 Final	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	3.93	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	18.6	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	83.7	11.7	LDA,LDT1,LDT2
Building Construction	Vendor	13.7	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT

Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating & Finishing	—	—	—	—
Architectural Coating & Finishing	Worker	16.7	11.7	LDA,LDT1,LDT2
Architectural Coating & Finishing	Vendor	—	8.40	HHDT,MHDT
Architectural Coating & Finishing	Hauling	0.00	20.0	HHDT
Architectural Coating & Finishing	Onsite truck	—	—	HHDT

5.3.2. Mitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	—	—	—	—
Demolition	Worker	12.5	11.7	LDA,LDT1,LDT2
Demolition	Vendor	—	8.40	HHDT,MHDT
Demolition	Hauling	3.93	20.0	HHDT
Demolition	Onsite truck	—	—	HHDT
Site Preparation	—	—	—	—
Site Preparation	Worker	7.50	11.7	LDA,LDT1,LDT2
Site Preparation	Vendor	—	8.40	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT
Grading	—	—	—	—
Grading	Worker	10.0	11.7	LDA,LDT1,LDT2
Grading	Vendor	—	8.40	HHDT,MHDT
Grading	Hauling	18.6	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	83.7	11.7	LDA,LDT1,LDT2

Building Construction	Vendor	13.7	8.40	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	12.5	11.7	LDA,LDT1,LDT2
Paving	Vendor	—	8.40	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating & Finishing	—	—	—	—
Architectural Coating & Finishing	Worker	16.7	11.7	LDA,LDT1,LDT2
Architectural Coating & Finishing	Vendor	—	8.40	HHDT,MHDT
Architectural Coating & Finishing	Hauling	0.00	20.0	HHDT
Architectural Coating & Finishing	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Control Strategies Applied	PM10 Reduction	PM2.5 Reduction
Water unpaved roads twice daily	55%	55%
Limit vehicle speeds on unpaved roads to 25 mph	44%	44%
Sweep paved roads once per month	9%	9%

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating & Finishing	286,700	95,567	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	14,000	—
Site Preparation	—	—	38.4	0.00	—
Grading	—	9,060	40.0	0.00	—
Paving	0.00	0.00	0.00	0.00	0.00

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Congregate Care (Assisted Living)	—	0%
Enclosed Parking with Elevator	0.00	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2027	0.00	204	0.03	< 0.005
2028	0.00	204	0.03	< 0.005

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.1.2. Mitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

5.18.2.2. Mitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

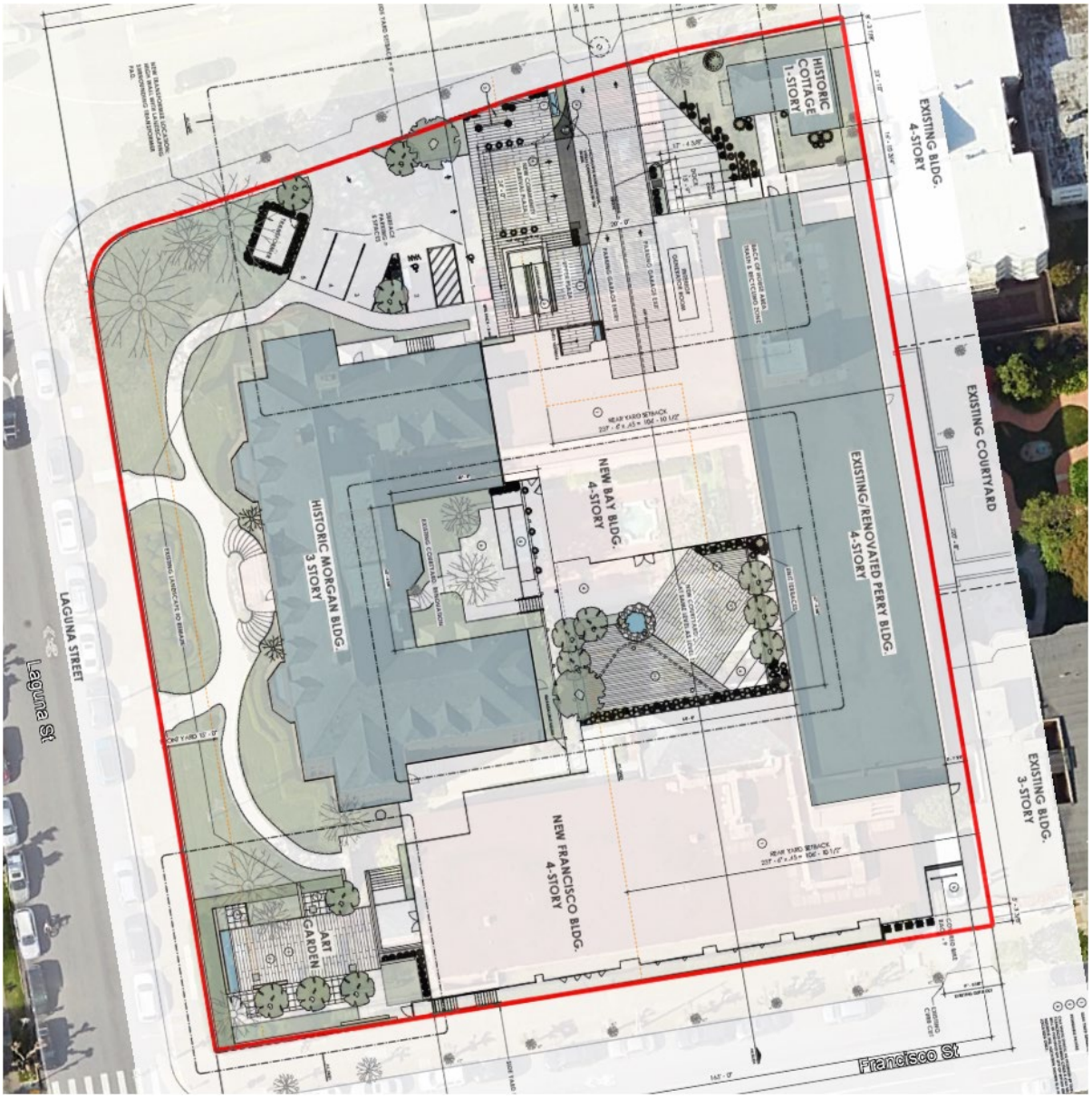
8. User Changes to Default Data

Screen	Justification
Land Use	Based on Project Description.
Construction: Construction Phases	Based on Construction Phasing provided by Applicant.
Construction: Off-Road Equipment	Based on construction equipment list provided by Project Applicant.
Construction: Dust From Material Movement	The proposed project would require approximately 9,060 cubic yards off-haul.

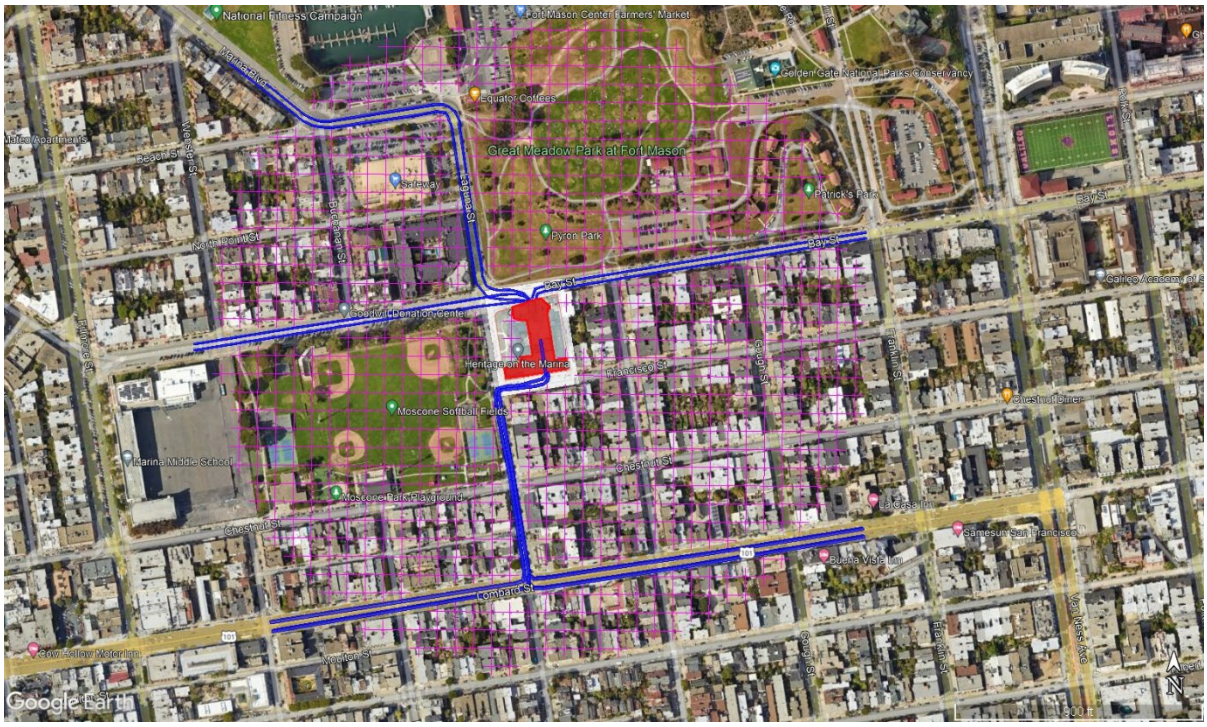
ATTACHMENT B

HRA MODEL SNAPSHOTS

Project Layout



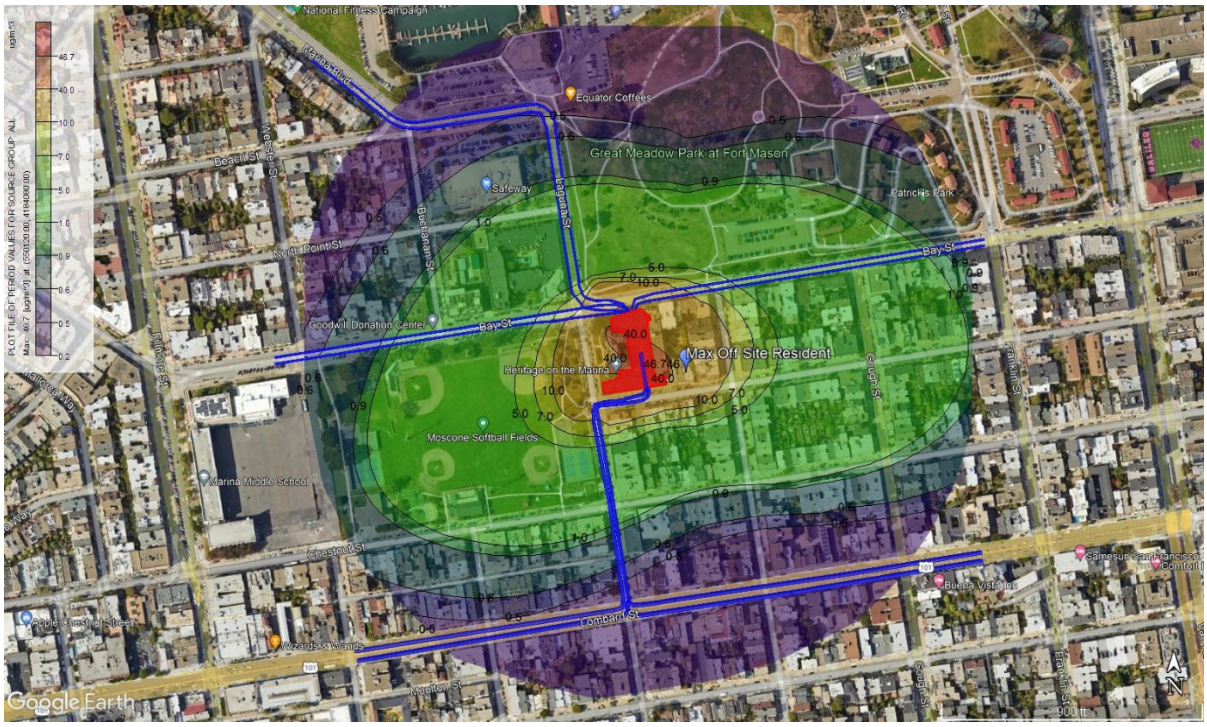
Project Grid and Sources



Uncontrolled Cancer Risk - On-site Residential Receptor



Uncontrolled Cancer Risk - Off-site Residential Receptor



Uncontrolled Cancer Risk - Off-site Childcare Receptor



Uncontrolled Cancer Risk - Off-site School Receptor



Uncontrolled Cancer Risk - On-site and Off-site Worker Receptors



Uncontrolled $PM_{2.5}$ Concentration



Uncontrolled Chronic Hazard Index - On-site Residential Receptor



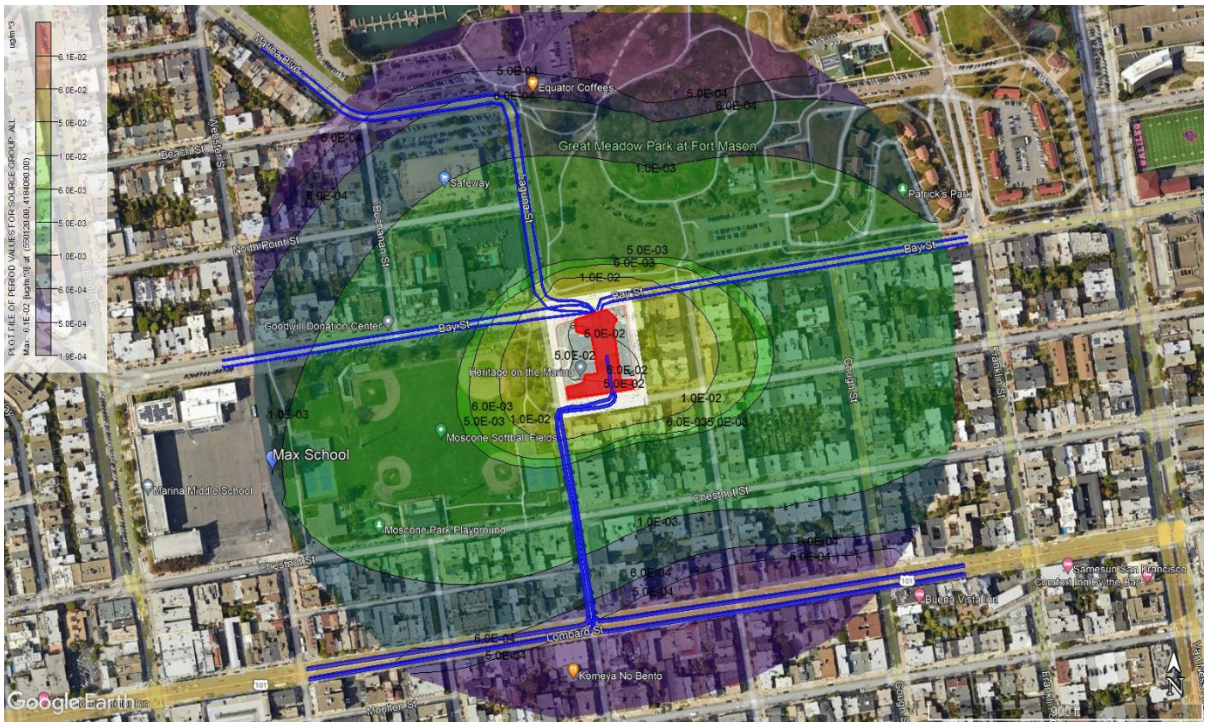
Uncontrolled Chronic Hazard Index - Off-site Residential Receptor



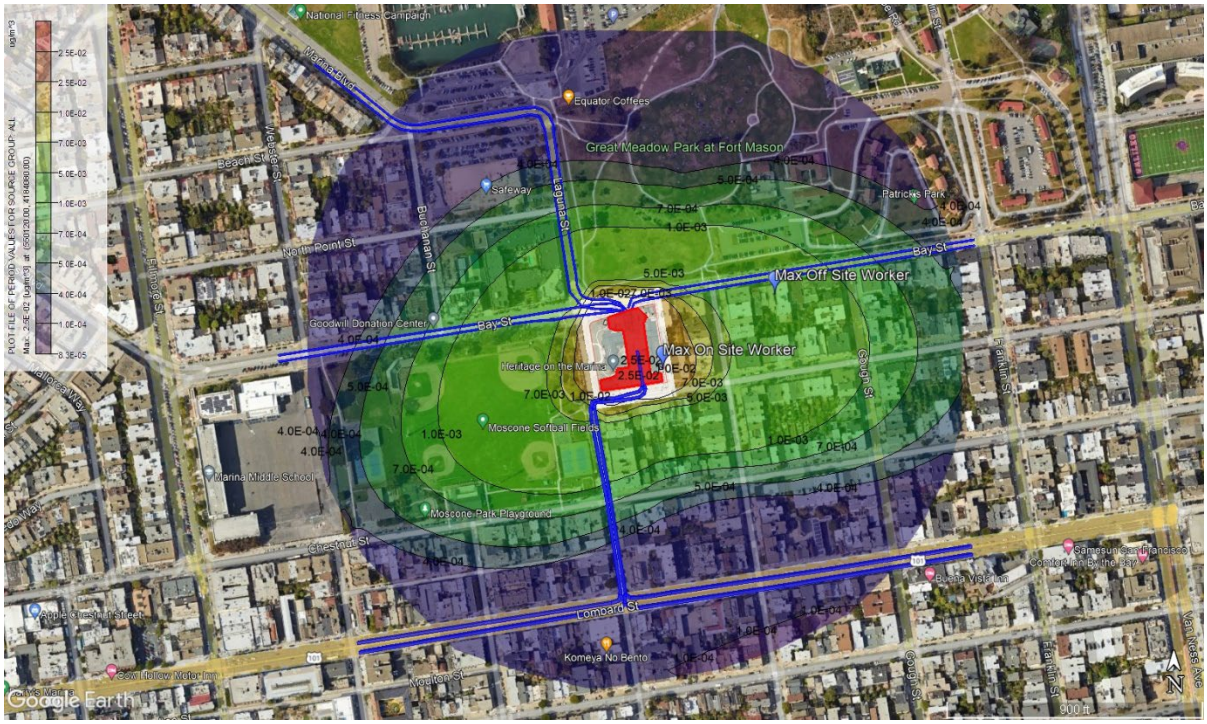
Uncontrolled Chronic Hazard Index - Off-site Childcare Receptor



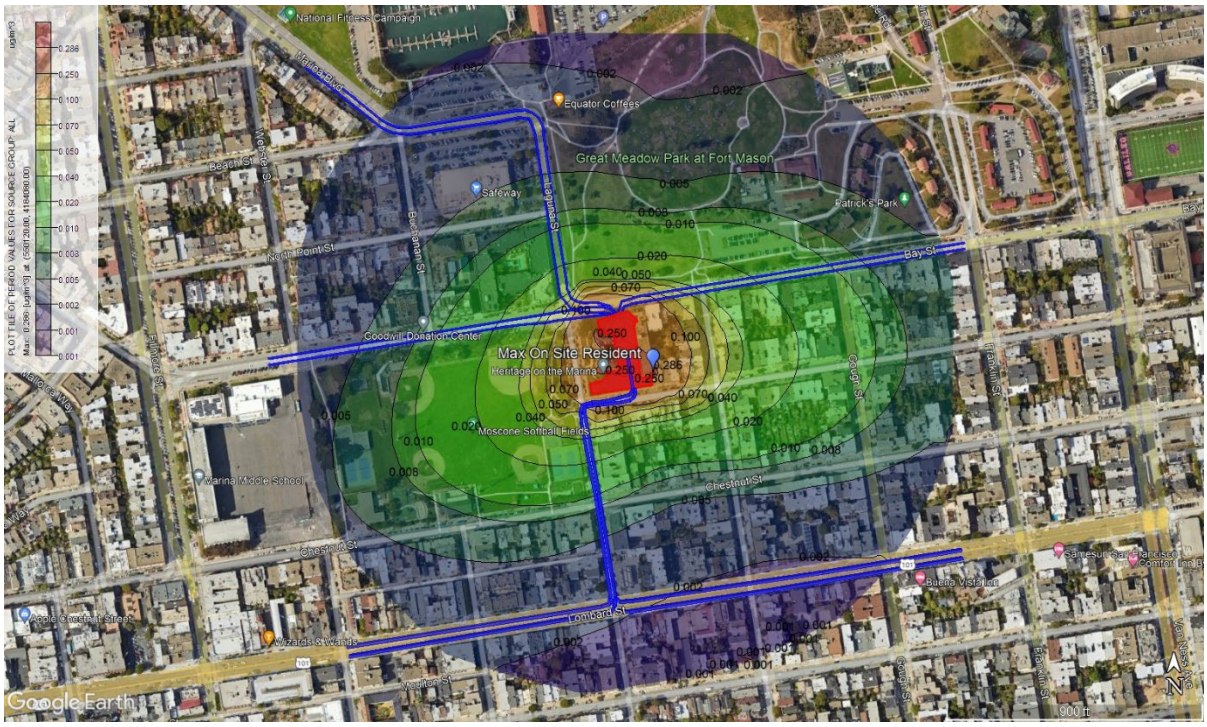
Uncontrolled Chronic Hazard Index - Off-site School Receptor



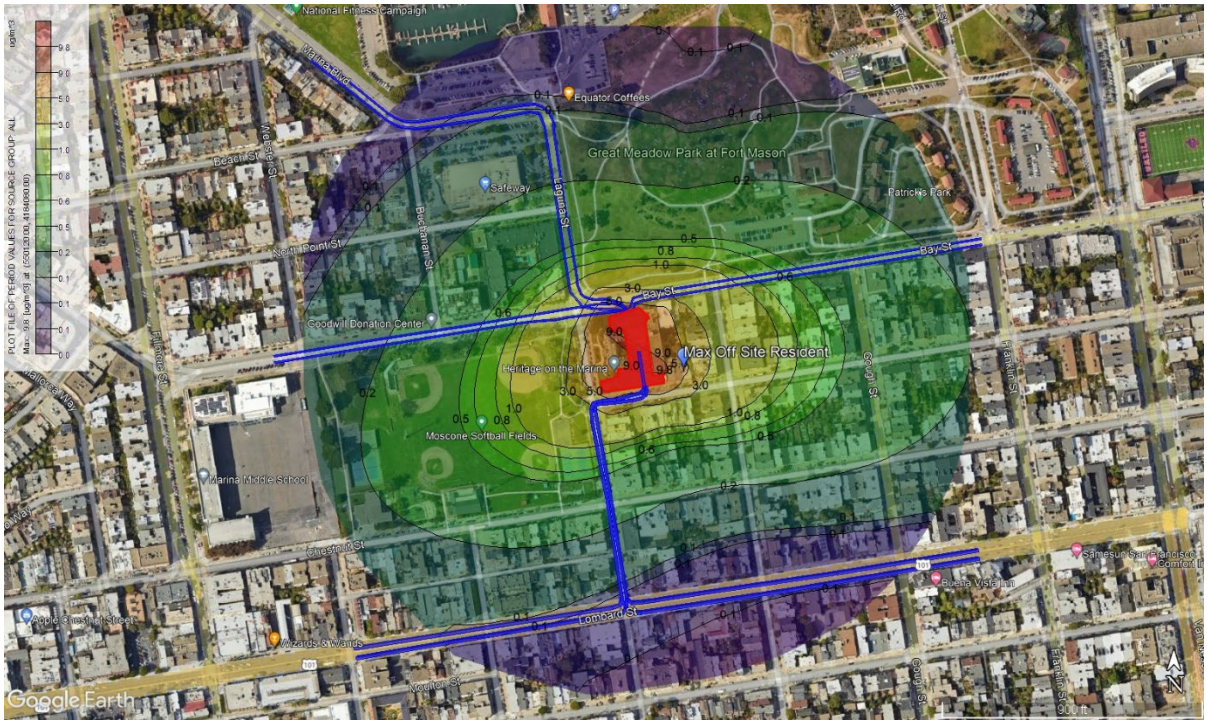
Uncontrolled Chronic Hazard Index - On-site and Off-site Worker Receptors



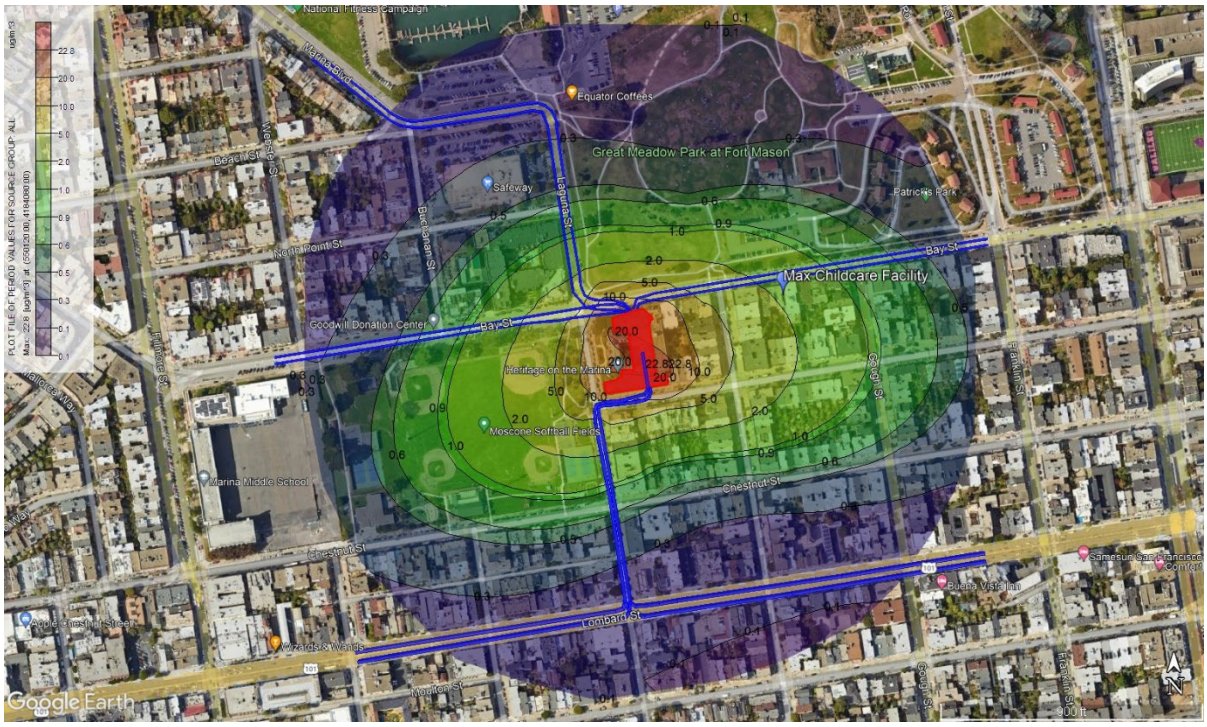
Controlled Cancer Risk - On-site Residential Receptor



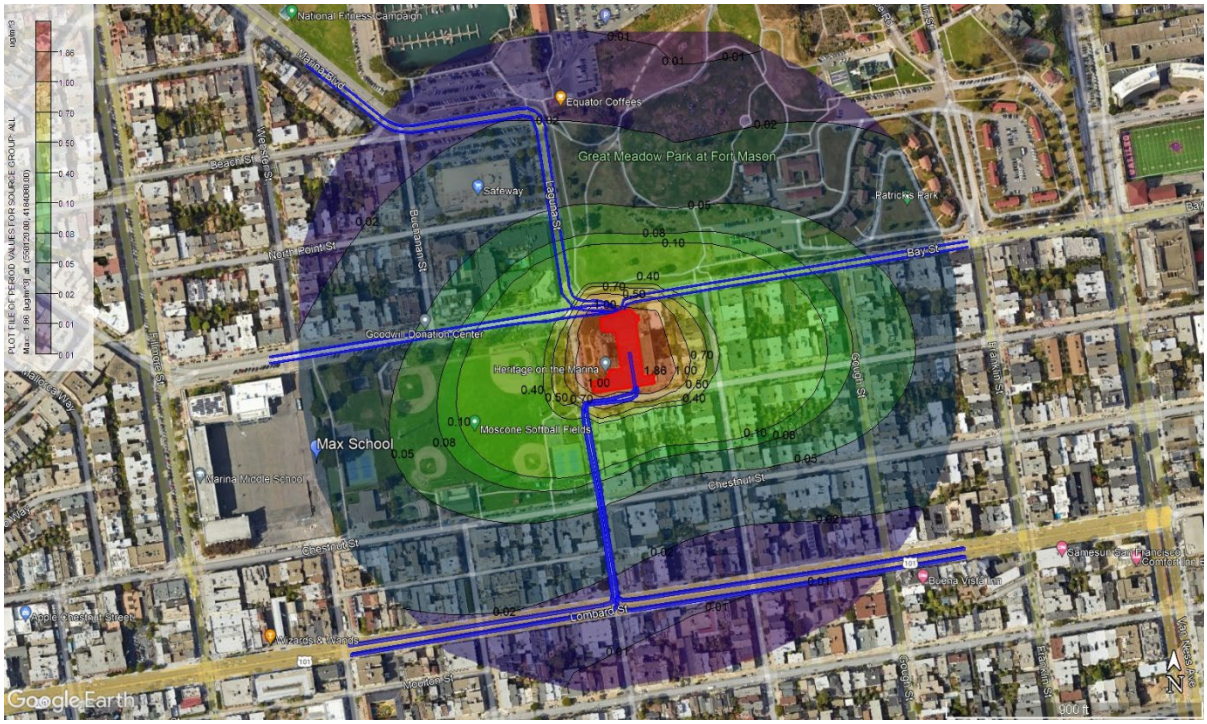
Controlled Cancer Risk - Off-site Residential Receptor



Controlled Cancer Risk - Off-site Childcare Receptor



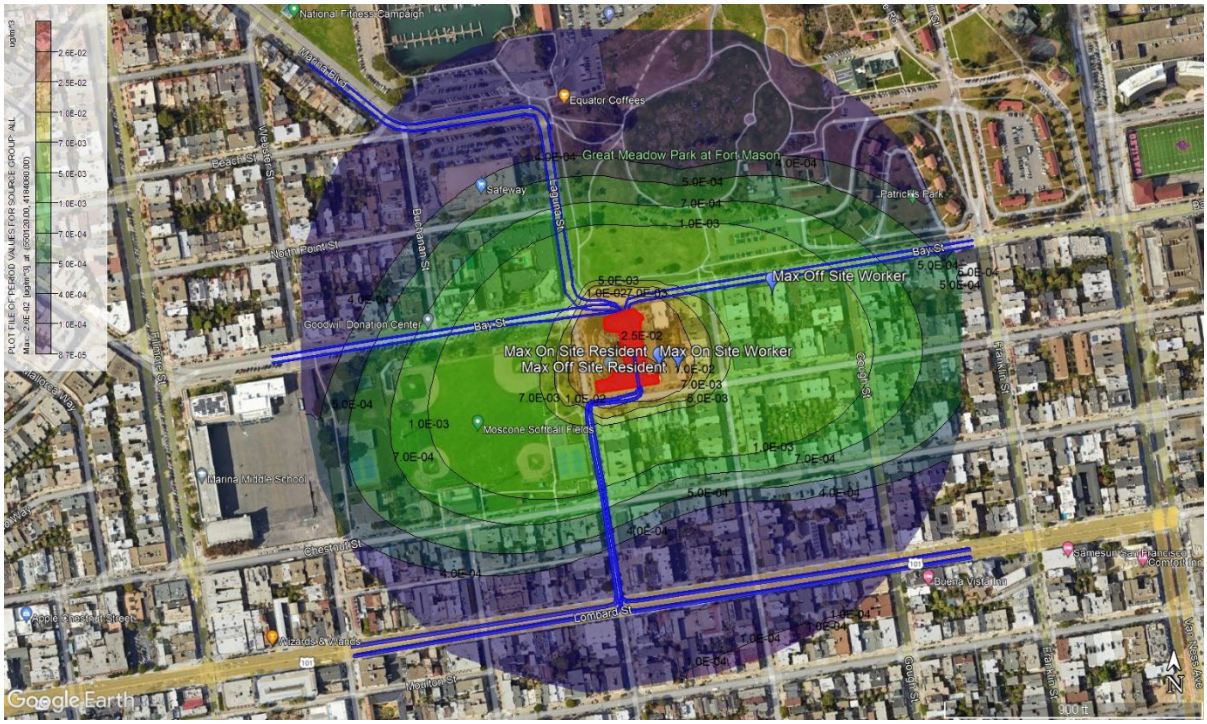
Controlled Cancer Risk - Off-site School Receptor



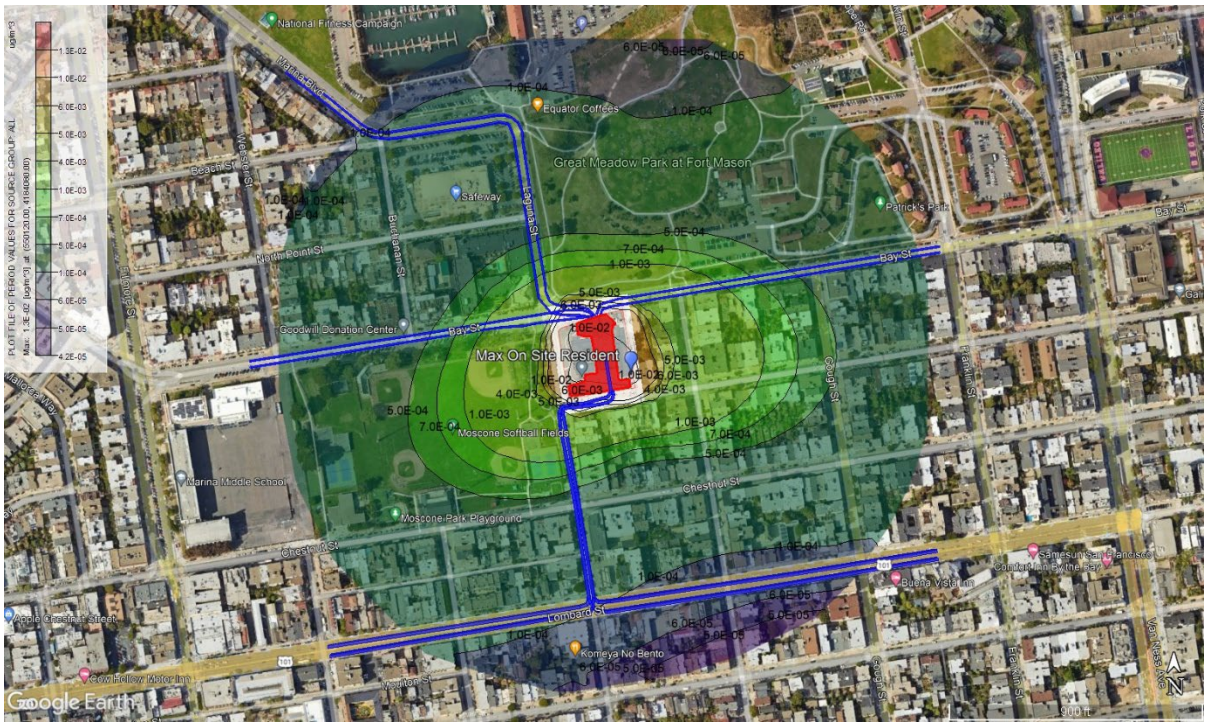
Controlled Cancer Risk - On-site and Off-site Worker Receptors



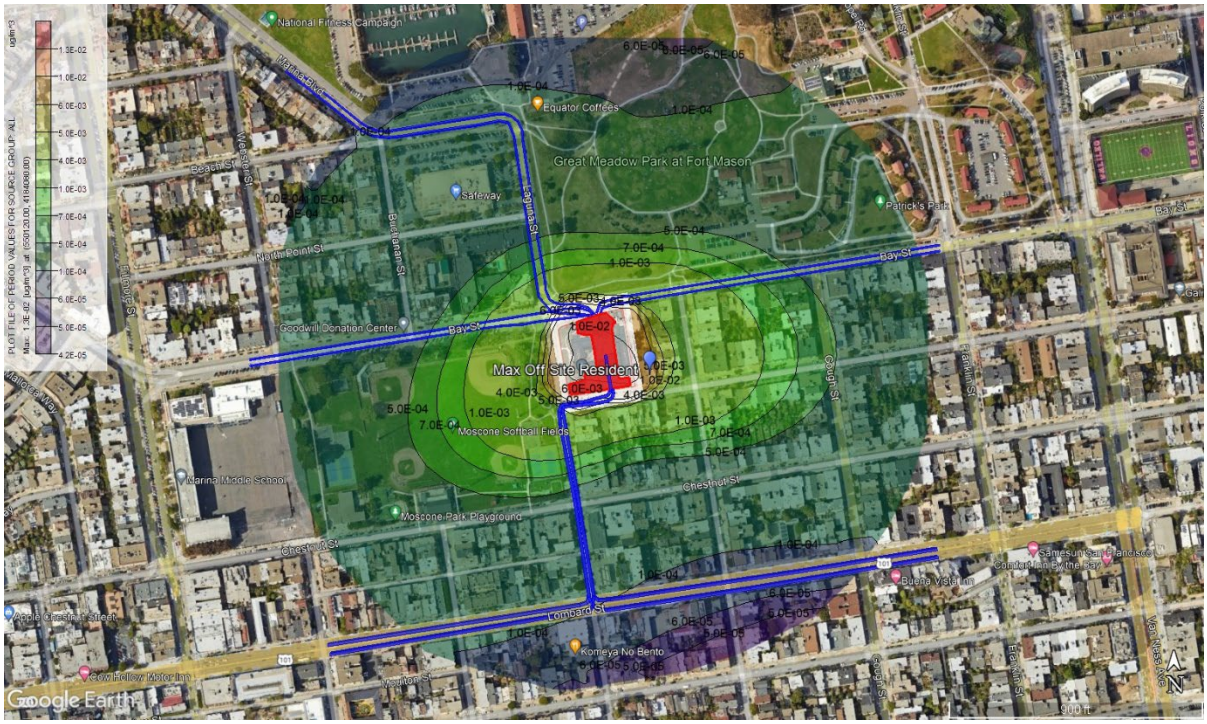
Controlled $PM_{2.5}$ Concentration



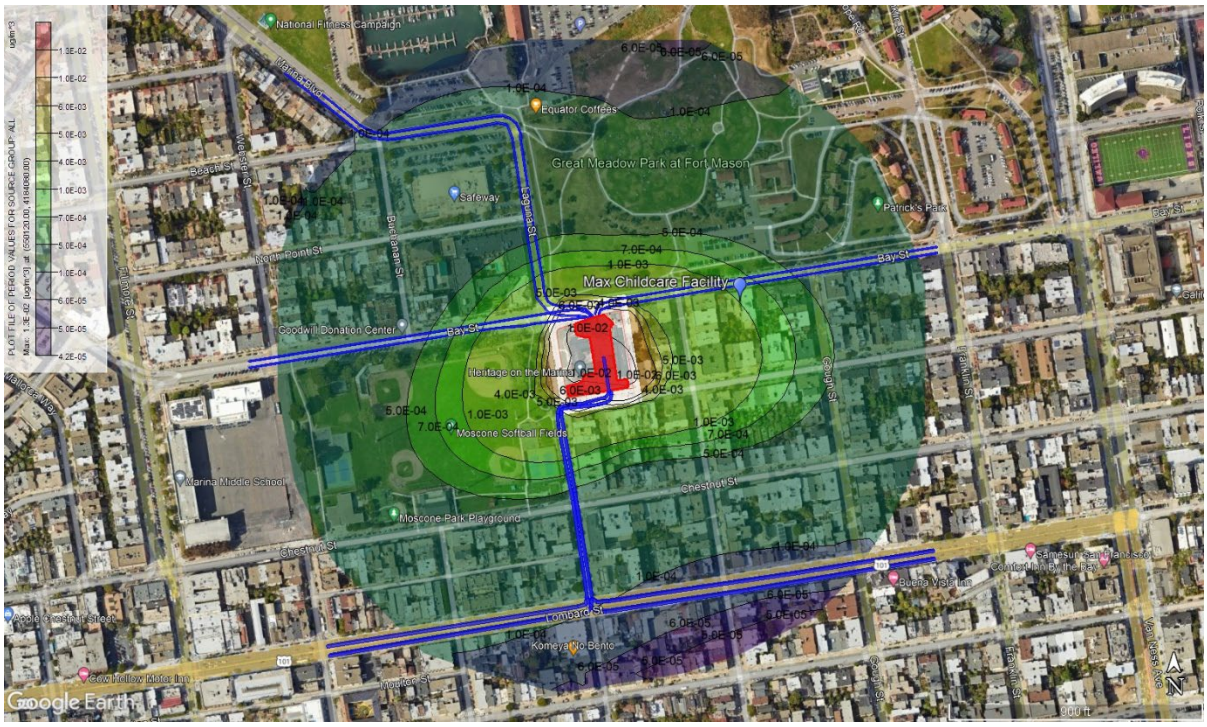
Controlled Chronic Hazard Index - On-site Residential Receptor



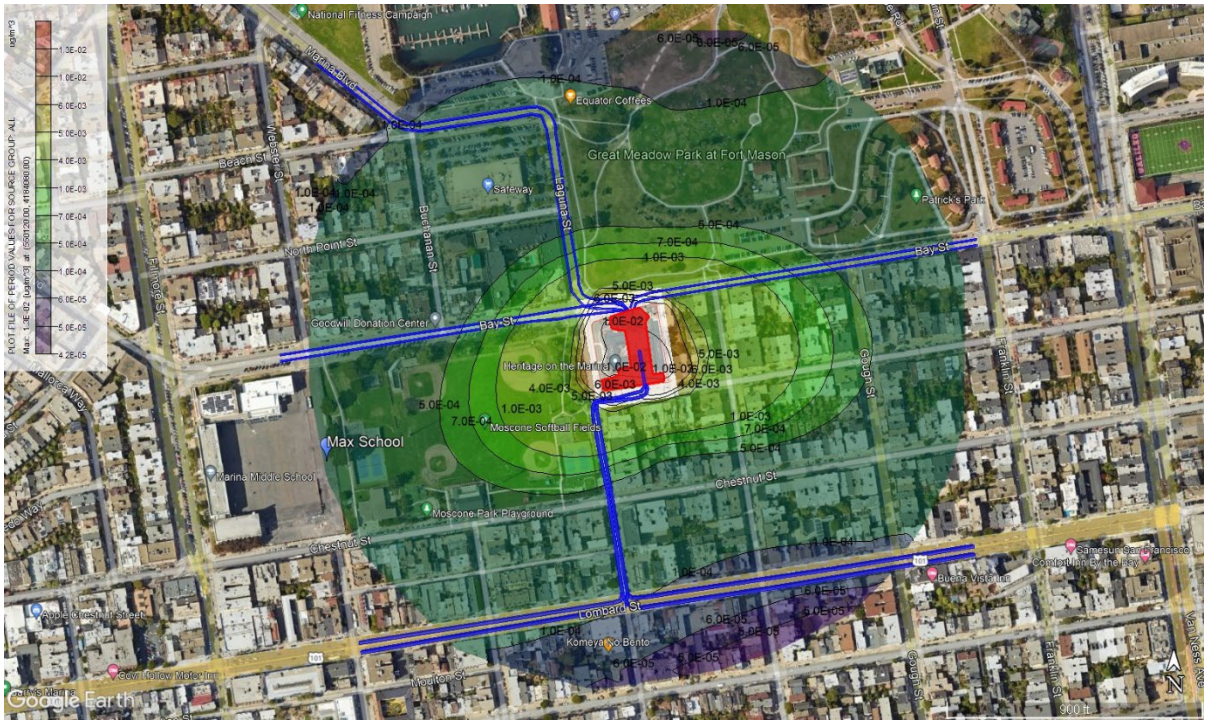
Controlled Chronic Hazard Index - Off-site Residential Receptor



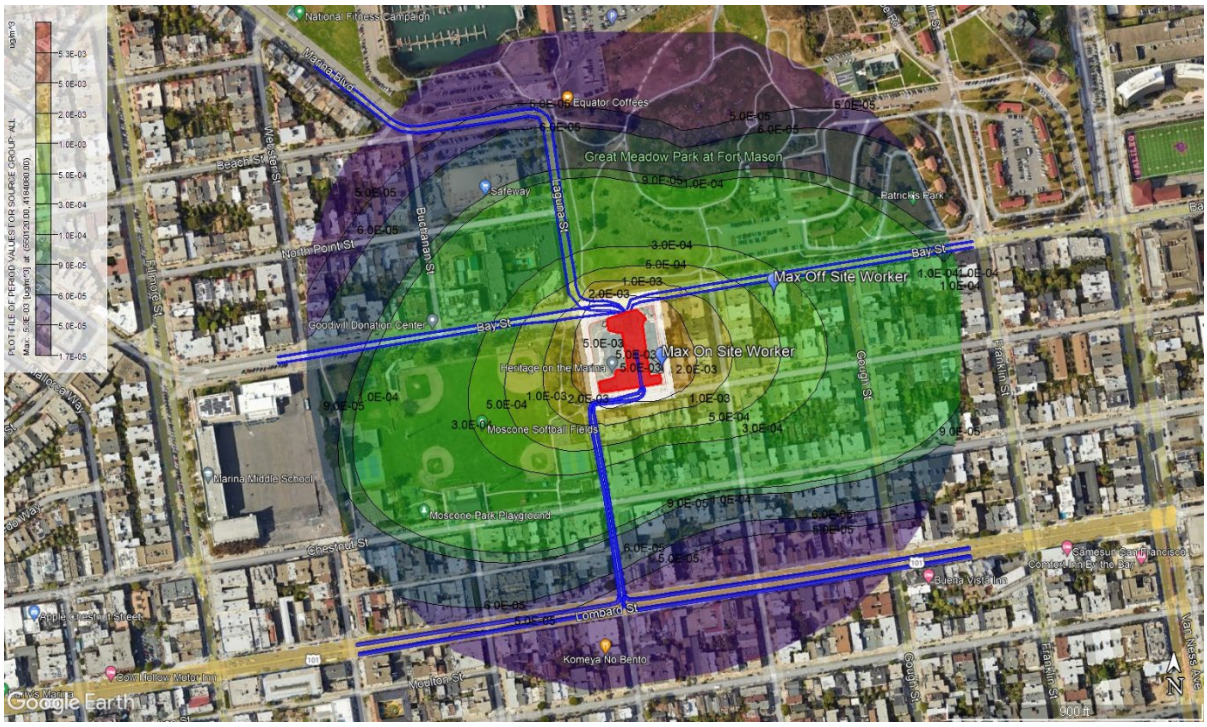
Controlled Chronic Hazard Index - Off-site Childcare Receptor



Controlled Chronic Hazard Index - Off-site School Receptor



Controlled Chronic Hazard Index - On-site and Off-site Worker Receptors



				In a Million					PM 2.5					Chronic HI				
Type	X	Y	Code	Average	T2L3	T4i	T4f	T4F-ElectGen	Average	T2L3	T4i	T4f	T4F-ElectGen	Average	T2L3	T4i	T4f	T4F-ElectGen
On Site Resident	550120	4184080	550120_4184080	1.37	0.40	0.68	0.29	0.24	0.126	0.037	0.063	0.022	0.029	0.061	0.018	0.030	0.013	0.004
Off Site Resident	550140	4184080	550140_4184080	26.31	7.63	13.12	5.49	4.58	0.071	0.021	0.035	0.015	0.012	0.034	0.010	0.017	0.007	0.002
Childcare	550240	4184160	550240_4184160	8.44	2.45	4.21	1.76	1.47	0.023	0.007	0.012	0.005	0.002	0.005	0.001	0.002	0.001	0.001
School	549760	4183980	549760_4183980	0.1381	0.04	0.07	0.03	0.02	0.005	0.001	0.002	9.81E-04	8.18E-04	9.40E-04	2.73E-04	4.69E-04	1.96E-04	6.82E-05
Worker On Site	550120	4184080	550120_4184080	0.69	0.20	0.35	0.14	0.12	0.126	0.037	0.063	0.026	0.029	0.025	0.007	0.013	0.005	0.004
Worker Off Site	550240	4184160	550240_4184160	0.053	0.015	0.027	0.011	0.009	0.010	0.003	0.005	0.002	0.002	0.002	0.001	0.001	0.000	0.000

Receptor Type	Age Group	Daily Breathing Rate (L/kg day or L/kg 8 hours)	Fraction of Time at Home	Exposure Frequency (days per year)	Exposure Duration (years)	Model Adjustment Factor	Age Sensitivity Factor	Conversion Factor (m^3/L)	Averaging Time (days)
Offsite Resident	Third Trimester	240	1	350	0.25	1	10	0.001	25,550
	Age 0-2 Years	1200	1	350	1	1	10	0.001	25,550
	Age 2-16 Years	520	1	350	1	1	3	0.001	25,550
	16-30	240	0.73	350	0	1	1	0.001	25,550
Offsite Childcare	Age 0-2 Years	1,200	1	350	1	4.2	10	0.001	25,550
	Age 2-9 Years	640	1	350	1	4.2	3	0.001	25,550
Offsite School	Age 2-16 Years	520	1	350	1	4.2	3	0.001	25,550

Chemical/TAC	EMFAC Gasoline TOG Speciation (% TOG)	Inhalation Cancer Potency Factors (mg/kg-day)$^{-1}$	Weighted Inhalation Cancer Potency Factor
Diesel Exhaust (Diesel Vehicles)			
Diesel Particulate Matter	n/a	1.1	n/a
TOG Exhaust (Gasoline Vehicles)			
Acetaldehyde	0.28%	1.00E-02	2.80E-05
Benzene	2.47%	1.00E-01	2.47E-03
1,3-Butadiene	0.55%	6.00E-01	3.30E-03
Ethylbenzene	1.05%	8.70E-03	9.14E-05
Formaldehyde	1.58%	2.10E-02	3.32E-04
Naphthalene	0.05%	1.20E-01	6.00E-05
Weighted Total Toxicity Factor	—	—	6.28E-03
TOG Evaporative (Gasoline Vehicles)			
Benzene	0.36%	0.1	3.60E-04
Ethylbenzene	0.12%	8.70E-03	1.04E-05
Weighted Total Toxicity Factor	—	—	3.70E-04

Construction

Project Area	Years	Days	$PM10_{Exhaust}$	$PM10_{Total}$
Tons/Yr*	2027	233	6.44E-02	0.086
	2028	260	3.96E-03	0.003
		0	0.00E+00	0.00E+00

*CalEEMod

Project Area	Years	$PM10_{Exhaust}$	$PM10_{Total}$
Lbs/Yr	2027	128.80	171.40
	2028	7.93	5.19
		0.00	0.00
	Total	136.73	176.59

Project Area	Years	$PM10_{Exhaust}$	$PM10_{Total}$
g/sec	2027	2.90E-03	3.86E-03
	2028	1.60E-04	1.05E-04
		0.00E+00	0.00E+00

HHDT Idling

	Years	Days	Trips	g/Trip*
Vendor	2027	233	30.5	0.0408
	2028	260	0	
		1	0	
Hauling	Years	Days	Trips	
	2027	233	22.5	
	2028	260	0	
		1	0	

*CalEEmod

Vendor	Years	$PM10_{Exhaust}$	$PM10_{Total}$
Lbs/Yr	2027	0.0027	0.0027
	2028	0.0000	0.0000
		0.0000	0.0000
Hauling	Years	$PM10_{Exhaust}$	$PM10_{Total}$
Lbs/Yr	2027	0.0020	0.0020
	2028	0.0000	0.0000
		0.0000	0.0000
	Total	0.0048	0.0048

Vendor	Years	$PM10_{Exhaust}$	$PM10_{Total}$
g/sec	2027	6.17E-08	6.17E-08
	2028	0.00E+00	0.00E+00
		0.00E+00	0.00E+00
Hauling	Years	$PM10_{Exhaust}$	$PM10_{Total}$
g/sec	2027	4.56E-08	4.56E-08
	2028	0.00E+00	0.00E+00
		0.00E+00	0.00E+00

Vendor & Hualing	Years	$PM10_{Exhaust}$	$PM10_{Total}$
g/sec	2027	1.07E-07	1.07E-07
	2028	0.00E+00	0.00E+00
		0.00E+00	0.00E+00

HHDT Travel

				g/VMT*		
Vendor	Years	Days	Trips	PMBW	PMTW	RUNEX
	2027	233	30.5	0.097	0.034	0.026
	2028	260	0			
		1	0			
Hauling	Years	Days	Trips	PMBW	PMTW	RUNEX
	2027	233	22.5	0.097	0.034	0.026
	2028	260	0			
		1	0			

*EMFAC 2021

Vendor	Years	$PM10_{Exhaust}$	$PM10_{Total}$
Lbs/Yr/mi	2027	0.0017	0.0106
	2028	0.0000	0.0000
		0.0000	0.0000
Hauling	Years	$PM10_{Exhaust}$	$PM10_{Total}$
Lbs/Yr/mi	2027	0.0013	0.0078
	2028	0.0000	0.0000
		0.0000	0.0000

Vendor & Hualing	Years	$PM10_{Exhaust}$	$PM10_{Total}$
Lbs/Yr/mi	2027	0.0030	0.0183
	2028	0.0000	0.0000
	0	0.0000	0.0000

Vendor	Years	$PM10_{Exhaust}$	$PM10_{Total}$
g/sec/mi	2027	3.91E-08	2.38E-07
	2028	0.00E+00	0.00E+00
		0.00E+00	0.00E+00
Hauling	Years	$PM10_{Exhaust}$	$PM10_{Total}$
g/sec/mi	2027	2.88E-08	1.76E-07
	2028	0.00E+00	0.00E+00
		0.00E+00	0.00E+00

Vendor & H	Years	$PM10_{Exhaus}$	$PM10_{Total}$
g/sec/mi	2027	6.79E-08	4.13E-07
	2028	0.00E+00	0.00E+00
		0.00E+00	0.00E+00

	Distance (m)						
Years	TRK1_OUT	TRK2_IN	TRK3_IN	TRK4_OUT	TRK_OUT	TRK_IN	Onsite
2027	289.8	298.2	373.7	385.4	263.2	266.3	38.7
2028							

*1609m = 1 mile

$PM10_{Exhaust}$ / Modeling Source (Lbs/Yr)						
TRK1_OUT	TRK2_IN	TRK3_IN	TRK4_OUT	TRK_OUT	TRK_IN	Onsite
1.09E-03	1.12E-03	1.40E-03	1.44E-03	9.86E-04	9.97E-04	1.45E-04
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

$PM10_{Total}$ / Modeling Source (Lbs/Yr)						
TRK1_OUT	TRK2_IN	TRK3_IN	TRK4_OUT	TRK_OUT	TRK_IN	Onsite
6.61E-03	6.80E-03	8.52E-03	8.79E-03	6.00E-03	6.07E-03	8.83E-04
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

Worker Travel

				g/VMT*		
TOG_RUNEX	Years	Days	Trips	LDA	LDT1	LDT2
	2027	233	113.7	0.025	0.099	0.080
	2028	260	29.2			
		1	0			
TOG_RUNLS	Years	Days	Trips	LDA	LDT1	LDT2
	2027	233	113.7	0.225	0.270	0.190
	2028	260	29.2			
		1	0			
PM10_PMTW	Years	Days	Trips	LDA	LDT1	LDT2
	2027	233	113.7	0.008	0.008	0.008
	2028	260	29.2			
		1	0			
PM10_PMBW	Years	Days	Trips	LDA	LDT1	LDT2
	2027	233	113.7	0.007	0.008	0.008
	2028	260	29.2			
		1	0			

*EMFAC 2021

RUNEX	Years	TOG_{Total}
Lbs/Yr/mi	2027	0.0510
	2028	0.0131
		0.0000
RUNLS	Years	TOG_{Total}
Lbs/Yr/mi	2027	0.1717
	2028	0.0441
		0.0000
PMTW	Years	$PM10_{Total}$
Lbs/Yr/mi	2027	0.0060
	2028	0.0015
		0.0000
PMBW	Years	$PM10_{Total}$
Lbs/Yr/mi	2027	0.0059
	2028	0.0015
		0.0000

RUNEX	Years	TOG_{Total}
g/sec/mi	2027	1.15E-06
	2028	2.65E-07
		0.00E+00
RUNLS	Years	TOG_{Total}
g/sec/mi	2027	3.87E-06
	2028	8.91E-07
		0.00E+00
PMTW	Years	$PM10_{Total}$
g/sec/mi	2027	1.36E-07
	2028	3.12E-08
		0.00E+00
PMBW	Years	$PM10_{Total}$
g/sec/mi	2027	1.33E-07
	2028	3.06E-08
		0.00E+00

	Distance (m)						
TOG_RUNEX	Years	VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
	2027	517.8	519.2	367.6	374.3	380.4	373.3
	2028						
TOG_RUNLS	Years	VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
	2027	517.8	519.2	367.6	374.3	380.4	373.3
	2028						

TOG_{Total} / Modeling Source (Lbs/Yr)					
VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
3.28E-02	3.29E-02	2.33E-02	2.37E-02	2.41E-02	2.37E-02
8.45E-03	8.47E-03	6.00E-03	6.11E-03	6.20E-03	6.09E-03
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
1.10E-01	1.11E-01	7.84E-02	7.99E-02	8.12E-02	7.97E-02
2.84E-02	2.85E-02	2.02E-02	2.05E-02	2.09E-02	2.05E-02
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

$PM10_{Total}$ / Modeling Source (Lbs/Yr)					
VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
7.67E-03	7.69E-03	5.44E-03	5.54E-03	5.63E-03	5.53E-03
1.97E-03	1.98E-03	1.40E-03	1.43E-03	1.45E-03	1.42E-03
0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00

	Pollutants	VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
TOG_RUNEX 2027	Acetaldehyde	9.20E-05	9.22E-05	6.53E-05	6.65E-05	6.76E-05	6.63E-05
	Benzene	8.11E-04	8.13E-04	5.76E-04	5.86E-04	5.96E-04	5.85E-04
	1,3-Butadiene	1.81E-04	1.81E-04	1.28E-04	1.31E-04	1.33E-04	1.30E-04
	Ethylbenzene	3.45E-04	3.46E-04	2.45E-04	2.49E-04	2.53E-04	2.49E-04
	Formaldehyde	5.19E-04	5.20E-04	3.68E-04	3.75E-04	3.81E-04	3.74E-04
	Naphthalene	1.64E-05	1.65E-05	1.17E-05	1.19E-05	1.21E-05	1.18E-05
TOG_RUNLS 2027	Benzene	3.98E-04	3.99E-04	2.82E-04	2.88E-04	2.92E-04	2.87E-04
	Ethylbenzene	1.33E-04	1.33E-04	9.41E-05	9.58E-05	9.74E-05	9.56E-05

2027 Total Lbs/Yr						
Pollutants	VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
Acetaldehyde	9.20E-05	9.22E-05	6.53E-05	6.65E-05	6.76E-05	6.63E-05
Benzene	1.21E-03	1.21E-03	8.58E-04	8.74E-04	8.88E-04	8.72E-04
1,3-Butadiene	1.81E-04	1.81E-04	1.28E-04	1.31E-04	1.33E-04	1.30E-04
Ethylbenzene	4.77E-04	4.79E-04	3.39E-04	3.45E-04	3.51E-04	3.44E-04
Formaldehyde	5.19E-04	5.20E-04	3.68E-04	3.75E-04	3.81E-04	3.74E-04
Naphthalene	1.64E-05	1.65E-05	1.17E-05	1.19E-05	1.21E-05	1.18E-05

All Total Lbs/Yr						
Pollutants	VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
Acetaldehyde	1.16E-04	1.16E-04	8.21E-05	8.36E-05	8.49E-05	8.33E-05
Benzene	1.45E-03	1.45E-03	1.03E-03	1.05E-03	1.06E-03	1.04E-03
1,3-Butadiene	2.27E-04	2.28E-04	1.61E-04	1.64E-04	1.67E-04	1.64E-04
Ethylbenzene	5.76E-04	5.78E-04	4.09E-04	4.17E-04	4.23E-04	4.15E-04
Formaldehyde	6.52E-04	6.54E-04	4.63E-04	4.72E-04	4.79E-04	4.70E-04
Naphthalene	2.06E-05	2.07E-05	1.47E-05	1.49E-05	1.52E-05	1.49E-05

	Pollutants	VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
TOG_RUNEX 2028	Acetaldehyde	2.36E-05	2.37E-05	1.68E-05	1.71E-05	1.74E-05	1.70E-05
	Benzene	2.09E-04	2.09E-04	1.48E-04	1.51E-04	1.53E-04	1.50E-04
	1,3-Butadiene	4.65E-05	4.66E-05	3.30E-05	3.36E-05	3.41E-05	3.35E-05
	Ethylbenzene	8.87E-05	8.89E-05	6.30E-05	6.41E-05	6.51E-05	6.39E-05
	Formaldehyde	1.33E-04	1.34E-04	9.47E-05	9.65E-05	9.80E-05	9.62E-05
	Naphthalene	4.22E-06	4.23E-06	3.00E-06	3.05E-06	3.10E-06	3.04E-06
TOG_RUNLS 2028	Benzene	3.04E-05	3.05E-05	2.16E-05	2.20E-05	2.23E-05	2.19E-05
	Ethylbenzene	1.01E-05	1.02E-05	7.20E-06	7.33E-06	7.45E-06	7.31E-06

2028 Total Lbs/Yr						
Pollutants	VEHN_IN	VEHN_OUT	VEHW_IN	VEHW_OUT	VWHE_IN	VEHE_OUT
Acetaldehyde	2.36E-05	2.37E-05	1.68E-05	1.71E-05	1.74E-05	1.70E-05
Benzene	2.39E-04	2.40E-04	1.70E-04	1.73E-04	1.76E-04	1.72E-04
1,3-Butadiene	4.65E-05	4.66E-05	3.30E-05	3.36E-05	3.41E-05	3.35E-05
Ethylbenzene	9.88E-05	9.91E-05	7.02E-05	7.14E-05	7.26E-05	7.12E-05
Formaldehyde	1.33E-04	1.34E-04	9.47E-05	9.65E-05	9.80E-05	9.62E-05
Naphthalene	4.22E-06	4.23E-06	3.00E-06	3.05E-06	3.10E-06	3.04E-06

Emergency Generator

HP	EF (g/BHP/Hr)*	Hrs /Yr	g/yr	g/sec
131	0.01	50	65.5	0.00018194

*CARB Off Road Compression - Ignition Diesel Engine Standards

Source: EMFAC2021 (v1.0.2) Emission Rates
Region Type: County
Region: San Francisco
Calendar Year: 2027
Season: Annual
Vehicle Classification: EMFAC2007 Categories
Units: miles/day for CVMT and EVMT, trips/day for Trips, g/mile for RUNEX, PMBW and PMTW, g/trip for STREX, HOTSOAK and RUNLOSS, g/vehicle/day for IDLEX and DIURN. PHEV calculated based on total VMT.

Region	Calendar Ye	Vehicle Cat	Model Year	Speed	Fuel	Population	Total VMT	CVMT	EVMT	Trips	NOx_RUNEX	NOx_IDLEX	NOx_STREX	PM2.5_RUNEX	PM2.5_IDLEX	PM2.5_STREX	PM2.5_PMTW	PM2.5_PMBW	PM10_RUNEX	PM10_IDLEX	PM10_STREX	PM10_PMTW	PM10_PMBW	CO2_RUNEX	CO2_IDLEX	CO2_STREX	CH4_RUNEX	CH4_IDLEX	CH4_STREX	N2O_RUNEX	N2O_IDLEX	N2O_STREX	ROG_RUNEX	ROG_IDLEX	ROG_STREX	ROG_HOTSOAK	ROG_RUNLOSS	ROG_DIURN	TOG_RUNEX	TOG_IDLEX	TOG_STREX	TOG_HOTSOAK	TOG_RUNLOSS	TOG_DIURN	NH3_RUNEX	CO_RUNEX	CO_IDLEX	CO_STREX	SOx_RUNEX	SOx_IDLEX	SOx_STREX
San Francisco	2027	HHDT	Aggregate	Aggregate	Diesel	1349.025231	101685.5171	101685.5171	0	12671.4416	3.205334022	37.42008201	3.222123784	0.024675006	0.039011788	0	0.008621638	0.033878232	0.025790701	0.040775728	0	0.034486551	0.096794948	1889.539977	6313.750428	0	0.001493368	0.124054022	0	0.297697793	0.994733951	0	0.032151798	2.670849083	0	0	0	0	0.036602375	3.040558373	0	0	0	0	0.194147785	0.127300163	36.49328617	0	0.017892814	0.059787441	0
San Francisco	2027	HHDT	Aggregate	Aggregate	Gasoline	1.448837512	73.34362942	73.34362942	0	28.98834093	7.288113052	0	0.147964683	0.002277718	0	0.001199621	0.005000001	0.033249697	0.002477226	0	0.001304697	0.020000006	0.094999135	2314.218144	0	58.65053124	0.194526319	0	7.50447E-05	0.217240398	0	0.003265365	1.119129401	0	0.000406703	0.110070048	0.963196413	7.120712232	1.633030995	0	0.000445289	0.110070048	0.963196413	7.120712232	0.045	40.37421626	0	6.785163279	0.022878402	0	0.00057982
San Francisco	2027	LDA	Aggregate	Aggregate	Diesel	418.4576539	10034.41594	10034.41594	0	1735.023208	0.145087508	0	0	0.015737468	0	0	0.002000001	0.003329609	0.016449047	0	0	0.008000002	0.009513169	250.7174316	0	0	0.001551565	0	0	0.039500633	0	0	0.032631054	0	0	0	0	0	0.037148286	0	0	0	0	0	0	0.0031	0.463436287	0	0	0.020375675	0	0
San Francisco	2027	LDT1	Aggregate	Aggregate	Diesel	2.12226489	20.32207681	20.32207681	0	5.891063406	1.194750365	0	0	0.22761149	0	0	0.002000001	0.004721019	0.237903071	0	0	0.008000002	0.013488626	437.4162287	0	0	0.013557946	0	0	0.068915105	0	0	0.291894603	0	0	0	0	0	0.332302599	0	0	0	0	0	0	0.0031	1.792868623	0	0	0.004144741	0	0
San Francisco	2027	LDT2	Aggregate	Aggregate	Diesel	324.3833365	10631.97802	10631.97802	0	1508.774676	0.043295577	0	0	0.005508497	0	0	0.002000001	0.004109684	0.005757567	0	0	0.008000002	0.011741955	330.6009267	0	0	0.001048889	0	0	0.052086311	0	0	0.022581956	0	0	0	0	0	0.025708055	0	0	0	0	0	0	0.0031	0.239307924	0	0	0.003132612	0	0
San Francisco	2027	LHDT1	Aggregate	Aggregate	Diesel	1834.326849	81069.52848	81069.52848	0	23073.52418	0.648568541	1.437574021	0	0.020636495	0.026645735	0	0.003000001	0.027300008	0.021569585	0.027850537	0	0.012000003	0.078000022	621.3536587	123.2447266	0	0.005174628	0.005098128	0	0.097894364	0.019417257	0	0.111406702	0.109759705	0	0	0	0	0.126829123	0.124954127	0	0	0	0	0	0.204149051	0.263761156	0.909745076	0	0.005887632	0.001167806	0
San Francisco	2027	LHDT2	Aggregate	Aggregate	Diesel	1076.831078	43893.79917	43893.79917	0	13545.18031	0.663670044	1.613866653	0	0.022777469	0.026839214	0	0.003000001	0.031850009	0.023807365	0.028052764	0	0.012000003	0.091000026	746.6330148	202.5616709	0	0.005496026	0.005098128	0	0.117632336	0.031913674	0	0.118326213	0.109759705	0	0	0	0	0.134706526	0.124954127	0	0	0	0	0	0.204910623	0.283037101	0.909745076	0	0.007074727	0.001919375	0
San Francisco	2027	LDA	Aggregate	Aggregate	Gasoline	123690.0398	4420178.822	4420178.822	0	573699.0431	0.03369265	0	0.231330199	0.001367796	0	0.001805849	0.002000001	0.003233179	0.001487603	0	0.001964026	0.008000002	0.009237654	273.3751038	0	65.64065397	0.002206573	0	0.061127035	0.004156052	0	0.030269777	0.008139262	0	0.279848119	0.084082162	0.225201615	1.324053362	0.011876793	0	0.306398465	0.084082162	0.225201615	1.324053362	0.037980439	0.677474147	0	2.87600279	0.007072591	0	0.000648925
San Francisco	2027	LDT1	Aggregate	Aggregate	Gasoline	12342.89567	367715.9729	367715.9729	0	55177.45872	0.071136595	0	0.3087366	0.001728588	0	0.002183359	0.002000001	0.004174927	0.001879997	0	0.002374602	0.008000002	0.011928362	331.4839315	0	80.28410153	0.004118055	0	0.079524262	0.006274486	0	0.034563607	0.017343931	0	0.391143647	0.127298715	0.351738614	1.988443873	0.025308224	0	0.428253059	0.127298715	0.351738614	1.988443873	0.036130969	1.01916852	0	3.880889841	0.003277056	0	0.00079369
San Francisco	2027	LDT2	Aggregate	Aggregate	Gasoline	67650.35726	2297095.068	2297095.068	0	316799.1703	0.046049074	0	0.273827839	0.001461889	0	0.001839314	0.002000001	0.004025835	0.001589938	0	0.002000422	0.008000002	0.011502386	338.0342319	0	80.70044591	0.002573267	0	0.068558853	0.004778739	0	0.033331019	0.009522813	0	0.310588784	0.069747537	0.188407191	1.139439308	0.013895667	0	0.340555624	0.069747537	0.188407191	1.139439308	0.038644525	0.748689076	0	3.117205168	0.003341813	0	0.000797806
San Francisco	2027	LHDT1	Aggregate	Aggregate	Gasoline	4945.315318	190933.66	190933.66	0	73677.82972	0.098009689	0.03401281	0.571461198	0.00130463	0	0.000201808	0.002000001	0.027300008	0.001418905	0	0.000219485	0.008000002	0.078000022	828.9418967	116.5962506	25.83741639	0.004934499	0.109490826	0.028770519	0.005737314	0.003014168	0.049315995	0.023572258	0.390058666	0.137925884	0.035677272	0.159423548	2.004753013	0.034396584	0.56917269	0.151011482	0.035677272	0.159423548	2.004753013	0.044991854	0.898738814	3.766370559	3.287060253	0.008194935	0.001152673	0.000255429
San Francisco	2027	LHDT2	Aggregate	Aggregate	Gasoline	609.7712474	22774.5641	22774.5641	0	9084.683027	0.099575395	0.033073052	0.568447308	0.001206833	0	0.000161348	0.002000001	0.031850009	0.001312541	0	0.000175481	0.008000002	0.091000026	937.1881842	134.8449869	25.05235906	0.003657942	0.10629232	0.027633782	0.00633875	0.002866637	0.047687713	0.015854797	0.379465371	0.131036092	0.034681187	0.185014775	1.987051102	0.023135283	0.553714978	0.143468027	0.034681187	0.185014775	1.987051102	0.044995477	0.727509729	3.770968892	3.209761912	0.009265059	0.001133308	0.000247668
																																													0.228919149	1.688747932					

APPENDIX E
TRIP GENERATION, FREIGHT LOADING, AND PASSENGER LOADING MEMO

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San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

June 7, 2024

Sherie George, Acting Transportation Team Lead
Environmental Division, San Francisco Planning
49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103

Re: 3400 Laguna Street, Proposed Project Trip Generation
Planning Department File No. 2022-009819ENV

To Whom It May Concern:

Pursuant to the *San Francisco Transportation Impact Analysis Guidelines for Environmental Review*[1], the San Francisco Planning Department prepared the following memo to analyze the potential trips generated from the proposed project at 3400 Laguna Street and whether implementation of the project would result in a passenger or freight loading deficit.

Project Description

The approximately 68,090-square-foot (approximately 1.6-acre) project site at 3400 Laguna Street is located on a corner lot southeast of the Laguna Street and Bay Street intersection in the Marina neighborhood. The site is bounded by Bay Street to the north, single- and multi-family residences near to and along Octavia Street to the east, Francisco Street to the south, and Laguna Street to the west. The project site has been occupied by the Heritage on the Marina residential care retirement community since 1925. Heritage on the Marina consists of five existing structures of approximately 83,200 gross square feet: the Julia Morgan Building, the Perry Building, the Perry Building Connector, the Health Center, and the Caretaker's Cottage. The current number of residential care suites is 86.

The proposed project would continue to operate as a residential care facility. The proposed project would demolish two of the five existing buildings (the Perry Connector and the Health Care Center) and construct two new buildings (the Bay Building and the Francisco Building) of heights not to exceed 40 feet and in the same locations as the demolished structures. The proposed project would renovate two of the other three existing buildings on the site. In total, the proposed project would add approximately 58,380 square feet of institutional use and increase the number of residential care suites by 23, from 86 to 109. Of the total 109 units, approximately 10 may have double occupancy; therefore, a total residential population of 119 is anticipated, or an increase of up to 33 residents compared to 86 residents under existing conditions. At project completion, a total of 75 staff members are expected to be employed at the site, which would be an increase of 22 staff members as compared

[1] San Francisco Planning Department, Transportation Impact Analysis Guidelines for Environmental Review (February 2019, updated October 2019), https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines, accessed on May 7, 2024.

to existing conditions. In total, the proposed project would consist of 141,580 gross square feet of institutional use, including 109 residential care units. Further detail is provided in Table 1.

Table 1 Proposed Project Details

Project Component	Existing	Proposed	Net Change
Number of Building(s)	5	5	0
Maximum Building Stories[1]	4	4	0
Maximum Building Height (feet)[1]	41	41	0
Building Gross Square Feet	83,200	141,580	+58,380
Residential Care Units	86	109	+23
Useable Open Space (gross square feet)	26,410	30,280	+3,870
Off-Street Parking Spaces	17	36	+19
Off-Street Loading Spaces	2	1	-1
On-Street Parking Spaces[2]	28	20	-8
On-Street Ride Share Spaces	0	1	+1
On-Street Commercial Loading Spaces	0	0	0
On-Street Passenger Loading Spaces	3	2	-1

Source: HKS Inc. and Kimley-Horn, 2023.
Notes: All gross square feet numbers are rounded to the nearest multiple of 10.
[1] Reflects the maximum building height and number of stories; existing buildings vary across the site. The existing Perry Building is 40.5 feet tall (rounded to 41 feet tall) and no changes to this building's height are proposed. The new Bay and Francisco building heights would not exceed 40 feet.
[2] Reduction in parking due to bulb-outs required by planning code section 138.1. In addition, one on-street parking space on Bay Street would be removed for the project's new driveway; however, one on-street parking space would be added on Francisco Street because the proposed project would eliminate the existing 22-foot passenger loading space on Francisco Street.

The project site currently includes 17 off-street vehicle parking spaces and two off-street loading spaces, which are accessible via the existing 18-foot-wide driveway along Bay Street. The project site has approximately 45 feet of passenger loading (white curb) and 20 feet of accessible parking (blue curb) on the Laguna Street frontage and 22 feet of passenger loading (white curb) on the Francisco Street frontage. Pedestrian access to the site is provided via gates along Laguna Street that access internal sidewalks connecting to the Julia Morgan Building entrances and additional accessible entrances from Bay Street.

The proposed project would construct a new basement level garage beneath the proposed Bay and Francisco buildings and the existing interior courtyard. The basement level would include 31 vehicular parking spaces for use by staff and residents, including one car-share space, and 18 bicycle parking spaces. A new two-directional, 20-foot-wide driveway on Bay Street would provide access to the new basement level garage, east of the existing entrance. Vehicles would be restricted to right-only turns into and out of the driveway. At this location, an approximately 20-foot-long, two-lane off-street covered porte cochère would provide universal access required by the residential care facility. The existing driveway on Bay Street, west of the new driveway, would provide access to five off-street surface parking spaces. (See Appendix A – Proposed Site Plan.)

The new driveway would necessitate the removal of the 17 existing off-street surface parking spaces and approximately 15 feet off-street parking spaces along Bay Street, resulting in the loss of one on-street parking space. However, one on-street parking space would be added on Francisco Street, thus eliminating the existing 22-foot passenger loading space and associated curb cut. Additionally, the project would remove an additional

eight on-street parking spaces for required bulb-outs on the corners of Laguna Street and Fransisco Street and Laguna Street and Bay Street as required by planning code section 138.1. The proposed project would also add 12 bicycle parking spaces in the public right of way (three located on Bay Street and nine located on Francisco Street).

In total the project would remove 8 on-street parking spaces and would add 19 off-street parking spaces. The proposed project would also remove one off-street loading space by reconfiguring the off-street parking to accommodate the new driveway, porte cochère and below-grade garage entrance. Additionally, one on-street passenger loading space would be removed on Francisco Street to add one on-street parking space.

Street Design Advisory Team (SDAT) Review

The project was reviewed in November 2022 by San Francisco Planning's Street Design Advisory Team (SDAT), and a final letter with SDAT feedback was issued to the sponsor on December 12, 2022, as part of the Preliminary Project Assessment Letter (See Appendix B - SDAT Letter, December 2022 and SDAT follow up email, June 2023). The project sponsor complied with SDAT requests regarding bulb out design and proposed driveway changes. On June 7, 2023, SDAT responded to the resubmittal, affirming the sponsor had adequately satisfied previous SDAT comments for Planning's purposes and did not need to return for a full SDAT second meeting (Appendix C).

Trip Generation Analysis

The trip generation analysis typically calls for calculating the total person and vehicle trips estimated from residential units and non-residential square footage proposed in the project application, to calculate the increase in vehicle trips that would occur if the proposed project were to be developed.

To understand how the addition of units and non-residential square footage would influence person and vehicle trips to and from the project site, the inputs for the total proposed project were 99 "studio" (single occupancy) residential care suites, 10 "one-bedroom" (double occupancy) units, and 71,580 square feet of office use.[2] Under consultation with the department, office was used as a proxy for institutional use to estimate the amount of net new worker trips, which has components of similarly functioning land uses and employee travel activity. The inputs for the net new trips were 23 "studio" (single occupancy) residential care suites and 43,620 square feet of office.[3] The results are presented in Table 2 (next page) and in Appendix C - San Francisco Travel Demand Tool, Trip Generation Output table, June 4, 2024.

[2] For purposes of this calculation, the project sponsor provided an estimated breakdown of total proposed project's residential care unit square footage (70,000) and non-residential institutional square footage (71,580).

[3] The proposed project would increase the institutional uses at the site by 58,830 gross square feet, which is inclusive of the 23 net new residential care units that would be added. To more accurately calculate institutional use trip generation verses residential trip generation, the planning department separated residential uses from institutional uses by subtracting the average residential care unit size (70,000 square feet / 109 residential care units = 642 square feet) times 23 new units (642 * 23 = 14,766 residential square feet) from 58,830. The result was 43,620 (when rounded to the nearest ten).

Table 2 Travel Demand Estimate, PM Peak Vehicle Trips for Proposed Project

	Person Trips		Vehicle Trips	
Mode	Total	PM peak	Total	PM Peak
Auto	611	54	494	44
TNC/Taxi	142	13	95	8
Transit	302	27	--	--
Private Shuttle	146	13	--	--
Bike	51	5	--	--
Walk	360	329	--	--
Total Proposed Project	1613	144	588	52
Total Net New Trips	787	70	302	27

NOTE: Travel Demand inputs: Total proposed project: 99 studio units, 10 one-bedroom units and 71,580 square feet of office (proxy for institutional) at 3400 Laguna Street, Placetype 2. Net new project: 23 studio units and 43,620 square feet of office (proxy for Institutional) at 3400 Laguna Street, Placetype 2.

Overall, the proposed project would add an estimated 302 total vehicle trips to the adjacent streets and roadways, of which 27 p.m. peak vehicle trips are estimated from the addition of 23 residential care units (net increase of 58,830 square feet of institutional space).

Loading Impact Analysis

A project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed off-street loading facilities or within convenient on-street loading zones, and create potentially hazardous traffic conditions or significant delays affecting traffic, transit, bicycles or pedestrians.

The proposed project passenger loading space demand by land use is presented in Table 3, Project Passenger Loading Demand by Land Use. The proposed project would generate a passenger loading demand for one passenger loading space during the peak 15 minutes of the peak hour through the average peak period of passenger loading activity (5-8 p.m.). The project's passenger loading demand would be accommodated within the existing on-street, 45-foot-long white curb zone (approximately 2 loading spaces) on Laguna Street frontage and no loading deficit would occur. Additionally, the proposed project would develop an approximately 20-foot-long, two-lane off-street loading zone via the porte cochère in front of the proposed new Bay Building, which would provide universal access to the project site and additional passenger loading.

Table 3 Passenger Loading Demand by Land Use

	Proposed Project	
	Passenger Loading Demand (Spaces)	
Land Use	Peak Hour	Peak 15-minute
Institutional (Office used as proxy)	0.22	0.45
Residential (Studio units used as proxy)	0.05	0.10
Rounded Total	**1**	**1**

SOURCES: San Francisco Planning Department, 2019 TIA Guidelines, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update, accessed May 14, 2024.

proposed project's freight and commercial loading demand is presented on Table 4, Project Freight Loading Demand by Land Use. The proposed project would generate demand of up to approximately one delivery and service loading activities per day which corresponds to a loading demand up to one loading spaces during the peak hour of freight loading activity through the average peak period of freight and commercial loading activity (11am-2pm). The proposed project would provide one off-street freight loading space accessible via Bay Street and parcel delivery could occur via the 20-foot-long off-street porte cochère in front of the new Bay Building. Additionally, the project's existing on-street, 45-foot-long white curb loading zone on Laguna Street has sufficient length to accommodate 2 vehicles, should simultaneous passenger and freight/commercial loading activity occur. As described by SFMTA's color curb program, any vehicle may use a white zone for active loading and are subject to the rules and restrictions for the effective days, hours, and time limits (i.e., parking for more than five minutes in white zone are subject to citation and towing).

Additionally, the project sponsor representing Heritage on the Marina provided an overview of the current freight loading operations at the site, including the number, frequency, and duration of freight loading events in a typical week and month (Appendix D). Based on the analysis conducted pursuant to the San Francisco Planning Department's Transportation Impact Analysis Guidelines and the information provided by the project sponsor, no freight and commercial loading deficit would occur.

Table 4 Freight Loading Demand by Land Use

	Proposed Project	
	Freight Loading Demand (Spaces)	
Land Use	Average Hour	Peak Hour
Institutional (Office used as proxy)	0.70	0.87
Residential	0.10	0.12
Rounded Total	1	1

SOURCES: San Francisco Planning Department, 2019 TIA Guidelines, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update, accessed May 14, 2024.

If you have any questions related to this project's environmental evaluation, please call me at 652.628.7508.

Sincerely,

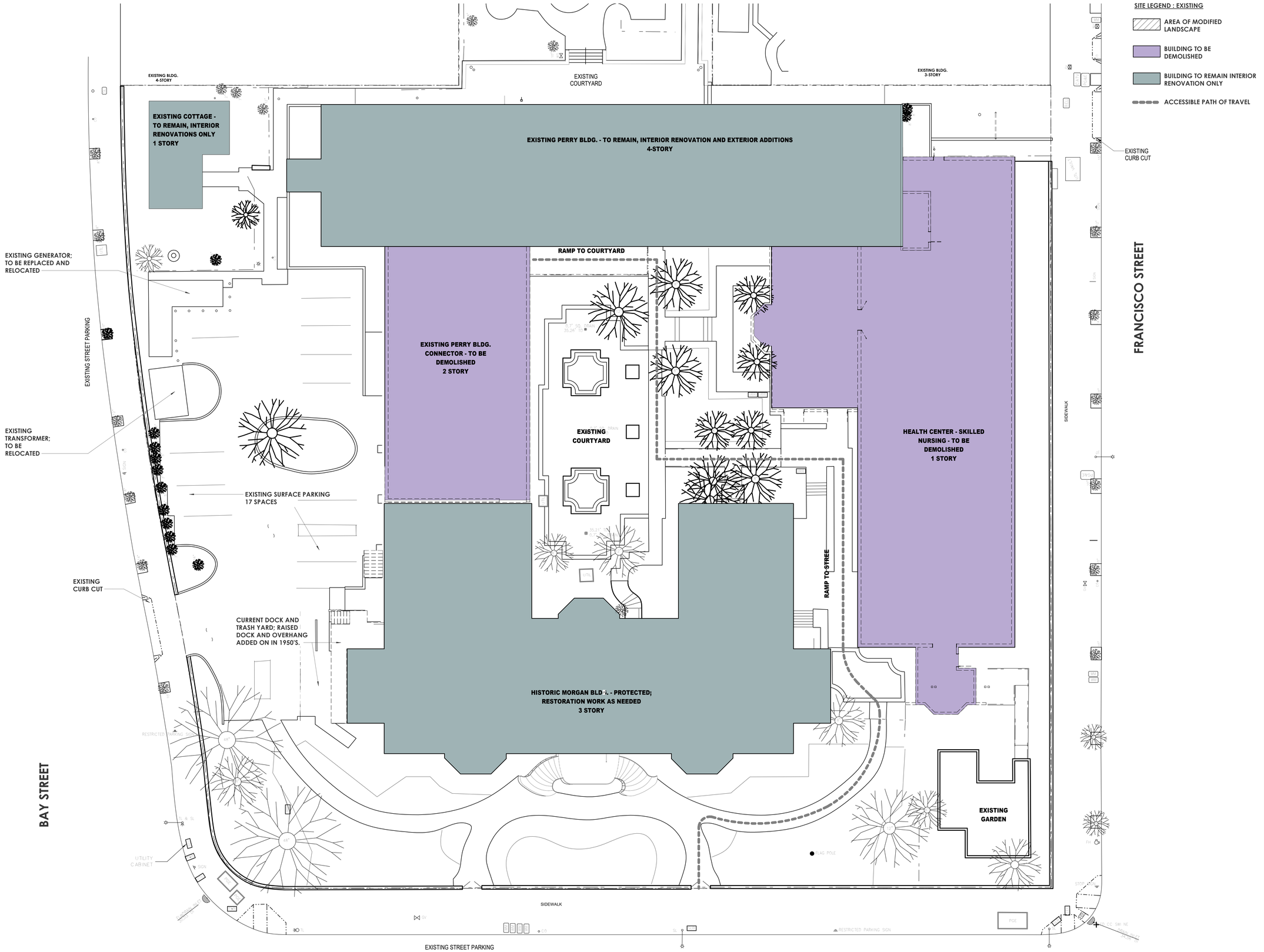
Megan Calpin
Senior Environmental Planner
Environmental Planning Division
San Francisco Planning Department

Appendices

Appendix A – Proposed Project Site Plan, 3400 Laguna Street, and Freight Loading Turn Templates
Appendix B – SDAT Letter, December 2022 and SDAT follow up email, June 2023
Appendix C - San Francisco Travel Demand Tool, Trip Generation Output table, June 4, 2024.
Appendix D – Heritage on the Marina Correspondence, June 2024

APPENDIX A

PROPOSED PROJECT SITE PLAN, 3400 LAGUNA STREET, AND FREIGHT LOADING TURN TEMPLATES



01 SITE PLAN - EXISTING

3/32" = 1'-0"

SITE LEGEND : EXISTING

- AREA OF MODIFIED LANDSCAPE
- BUILDING TO BE DEMOLISHED
- BUILDING TO REMAIN INTERIOR RENOVATION ONLY
- ACCESSIBLE PATH OF TRAVEL

HKS

ARCHITECT
HKS, INC.
350 N SAINT PAUL ST, SUITE 100
DALLAS, TX 75201- 4240

HERITAGE ON THE MARINA

OWNER
SAN FRANCISCO LADIES' PROTECTION AND RELIEF SOCIETY
3400 LAGUNA STREET
SAN FRANCISCO CA 94123-2271

OWNER'S CIVIL ENGINEER
KIMLEY HORN
2121 S EL CAMINO REAL
SAN MATEO, CA, 94403

INTERIM REVIEW ONLY

These documents are incomplete, and are released for interim review only and are not intended for regulatory approval, permit, or construction purposes.

Architect: XXXX XXXX
Arch. Reg. No.: XXXX
Date: XX/XX/XX

REVISION NO. | DESCRIPTION | DATE

HKS PROJECT NUMBER
24940.000

DATE
05.15.2023

ISSUE
PROJECT STATUS

SHEET TITLE
SITE -EXISTING

SHEET NO.
A1.10

© 2022 HKS, INC.

PLOT DATE: 11/1/2024 7:59:51 PM TEMPLATE VERSION: 21.0.0.20200831

SITE LEGEND : NEW CONSTRUCTION

1. REAR YARD SETBACK; WILL COMPLY VIA CUP PROCESS
2. PERMEABLE PAVERS
3. CAR SHARE SPACE: AS REQUIRED BY TABLE 166 OF SAN FRANCISCO PLANNING CODE A CAR SHARE SPACE WILL BE PROVIDED ON SITE OR WITHIN 800 FEET OF BUILDING SITE. LOCATION SHOWN IS A POSSIBLE LOCATION ONLY.

EXISTING BLDG. 4-STORY

EXISTING COURTYARD

EXISTING BLDG. 3-STORY

8' - 3 7/8" | 23' - 10" | 16' - 10 3/4" | 220' - 8" | 5' - 3 3/8"

5' - 7 7/8"

EXISTING 1 STORY COTTAGE - MINOR MAINTENANCE ONLY

EXISTING/RENOVATED PERRY BLDG. 4-STORY

BACK OF HOUSE AREA TRASH & RECYCLING ZONE

BIKE RACK

EXISTING CURB CUT

STREET PARKING

EXISTING TREE : SIGNIFICANT TREE TO REMAIN

DOCK CANOPY

DOCK

15' - 9"

INTERIOR GENERATOR ROOM

47' - 6 3/8"

UNIT TERRACES

NEW CURB CUT

EXISTING TREE REMOVED; REPLACEMENT REQUIRED

PARKING GARAGE EXIT

ART WALLS

BUILDING ABOVE

20' - 0"

PARKING GARAGE ENTRY

DECORATIVE WATER FEATURE. VISUAL CONTINUATION TO THE INSIDE

NEW COURTYARD: AT SAME LEVEL AS LEVEL 1

A4.02/04

65' - 0"

BAY STREET

UPPER PLAZA

NEW BAY BLDG. 4-STORY

zero curb

NEW COMMUNITY ARRIVAL PLAZA

ACCESSIBLE RAMP

ENTRY VESTIBULE

wall height up to 48"

A1.13/03

low slope path to street front raised terrace.

BIKE RACK - 3

GARAGE LIMIT BELOW

NEW FRANCISCO BLDG. 4-STORY

37' - 3 3/8"

165' - 0"

237' - 6"

STREET PARKING

FRANCISCO STREET

SIDE YARD SETBACK = 0'

SURFACE PARKING = 5 SPACES

45' - 0"

EXISTING COURTYARD: RENOVATION

43' - 4 5/8"

SIDE YARD SETBACK = 0'

114' - 3 1/8"

HISTORIC MORGAN BLDG. 3 STORY

TRANSFORMER

ART GARDEN

A1.13/01

66' - 10 1/8"

A1.13/02

NEW TRANSFORMER LOCATION; RECESS TRANSFORMER BELOW STREET LEVEL IF ALLOWED BY PG&E

EXISTING LANDSCAPE TO REMAIN

FRONT YARD 15' - 0"

STREET PARKING | PASSENGER LOADING (WHITE CURB) | ACCESSIBLE PARKING

LAGUNA STREET

01 PRJ -SITE
3/32" = 1'-0"

© 2022 HKS, INC.

HKS

ARCHITECT
HKS, INC.
350 N SAINT PAUL ST, SUITE 100
DALLAS, TX 75201- 4240

HERITAGE ON THE MARINA

OWNER
SAN FRANCISCO LADIES' PROTECTION AND RELIEF SOCIETY
3400 LAGUNA STREET
SAN FRANCISCO CA 94123-2271

OWNER'S CIVIL ENGINEER
KIMLEY HORN
2121 S EL CAMINO REAL
SAN MATEO, CA, 94403

INTERIM REVIEW ONLY

These documents are incomplete, and are released for interim review only and are not intended for regulatory approval, permit, or construction purposes.

Architect: XXXX XXXX
Arch. Reg. No.: XXXX
Date: XX/XX/XX

REVISION

NO.	DESCRIPTION	DATE
1	PRJ Rev. 2	2024.01.10

HKS PROJECT NUMBER
24940.000

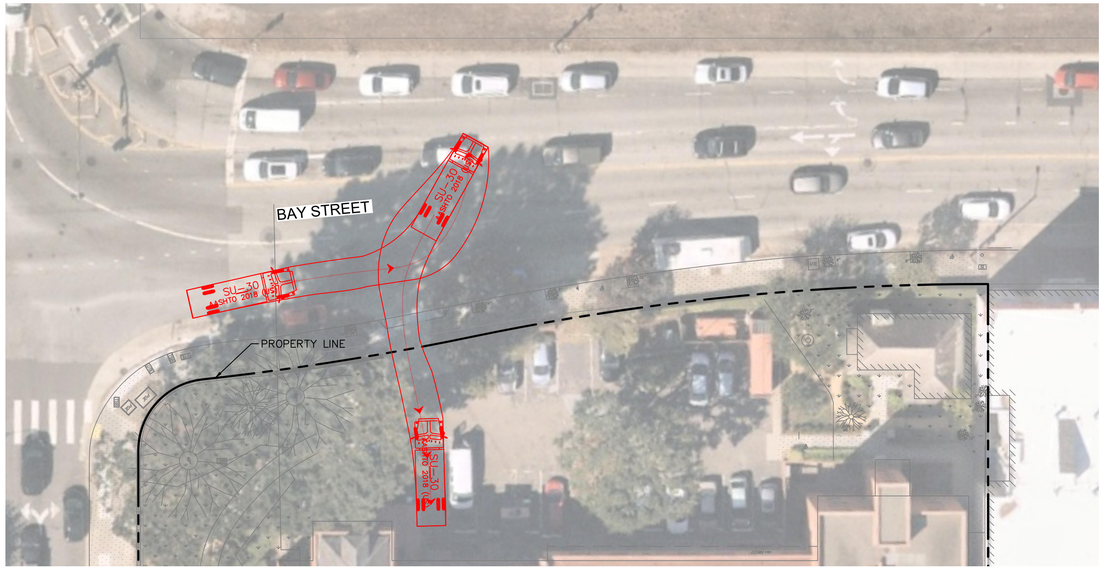
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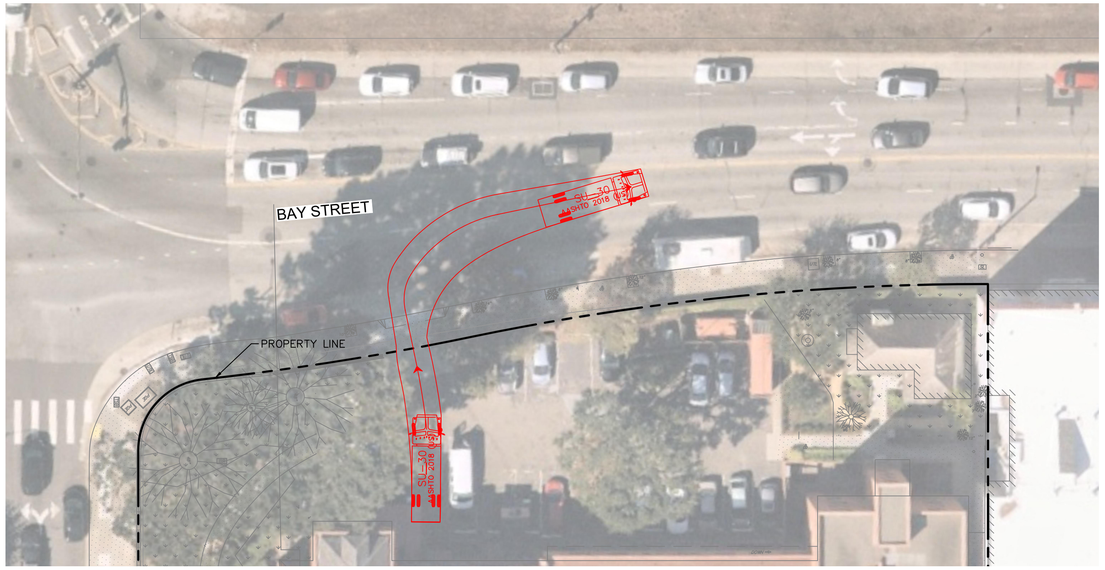
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SITE - PROPOSED

SHEET NO.
A1.12

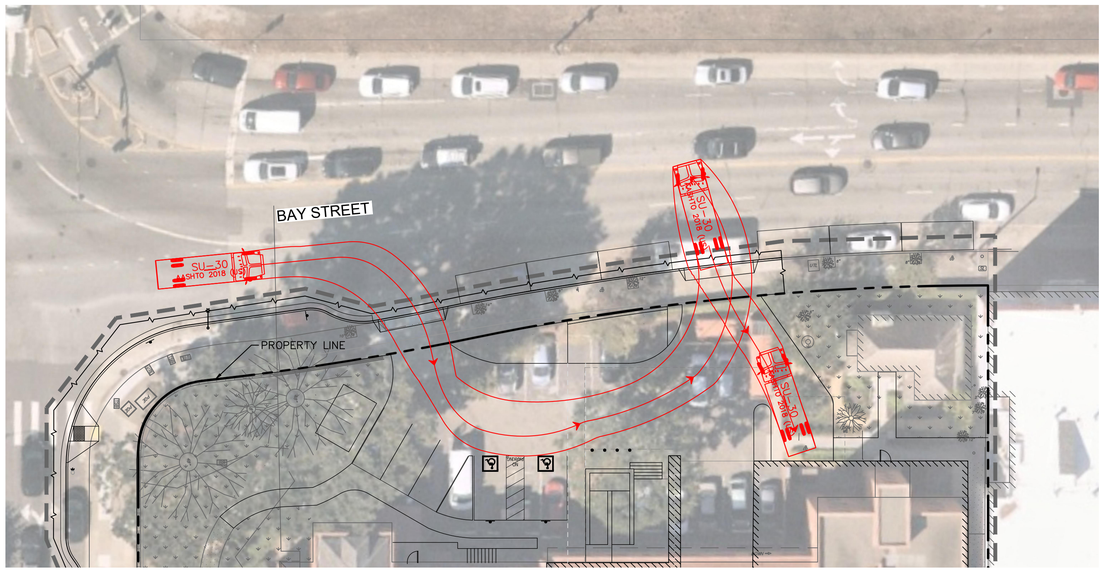
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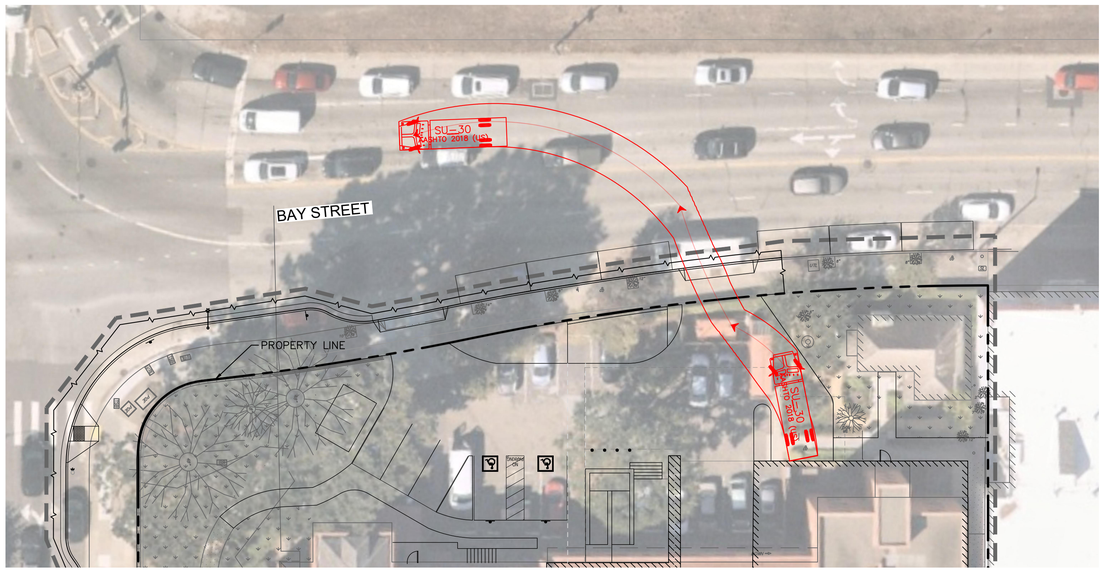
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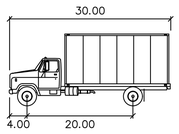
EXISTING LOADING DEPARTURE



PROPOSED LOADING ENTRY



PROPOSED LOADING DEPARTURE



SU-30

	feet
Width	: 8.00
Track	: 8.00
Lock to Lock Time	: 6.0
Steering Angle	: 31.8

VEHICLE DATA

SU-30 LOADING TRUCK
HERITAGE ON THE MARINA

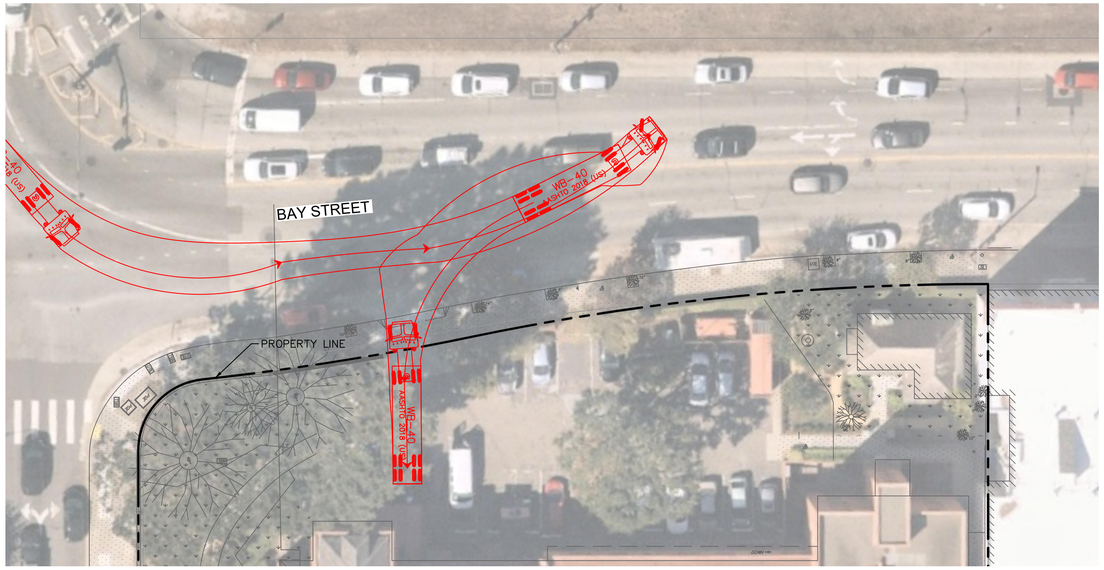
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NORTH

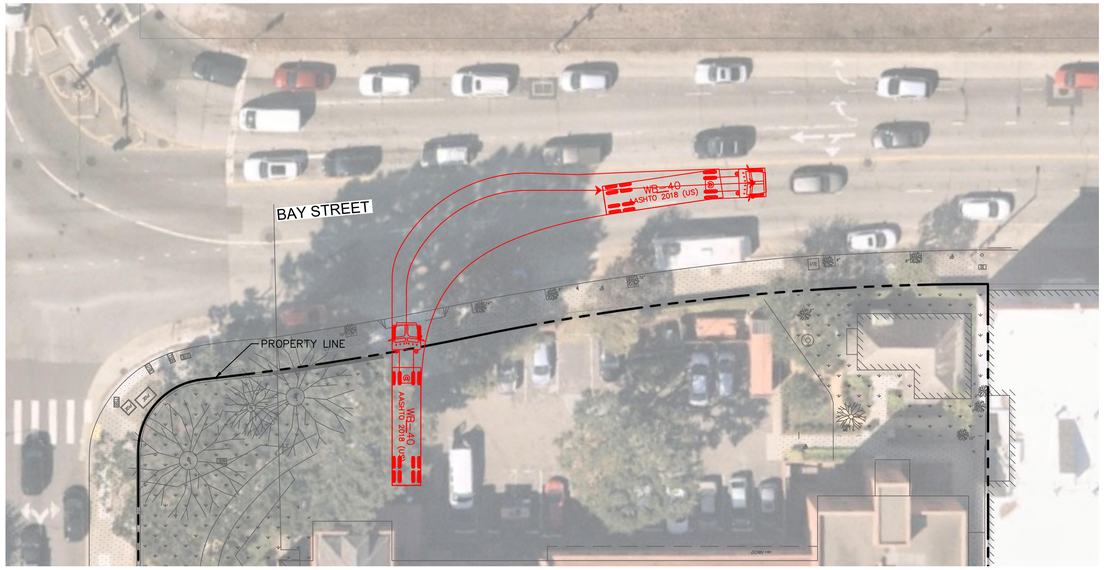
GRAPHIC SCALE IN FEET
0 10 20 40

©2023

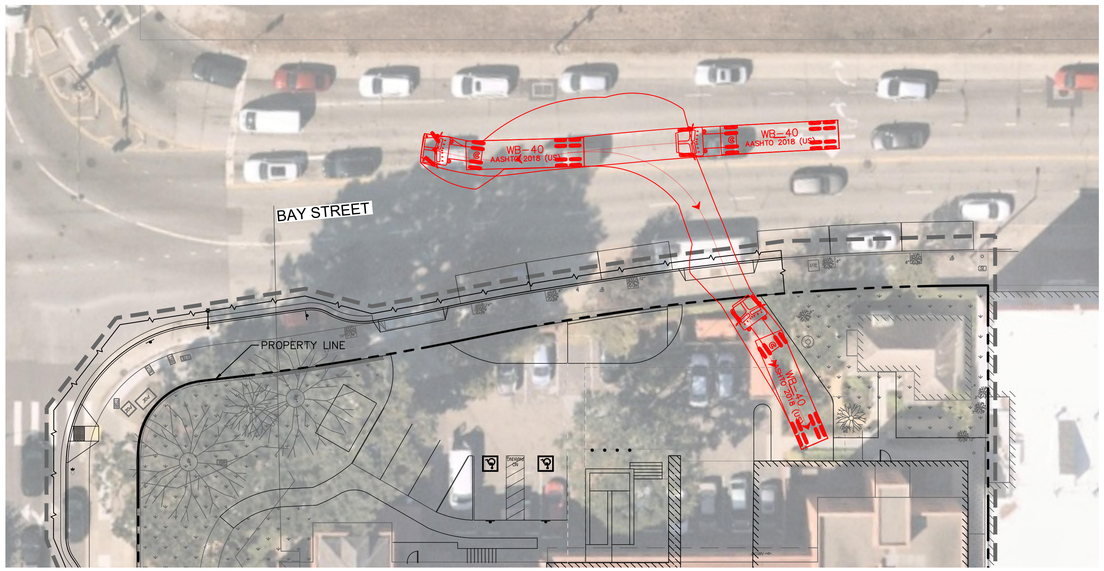
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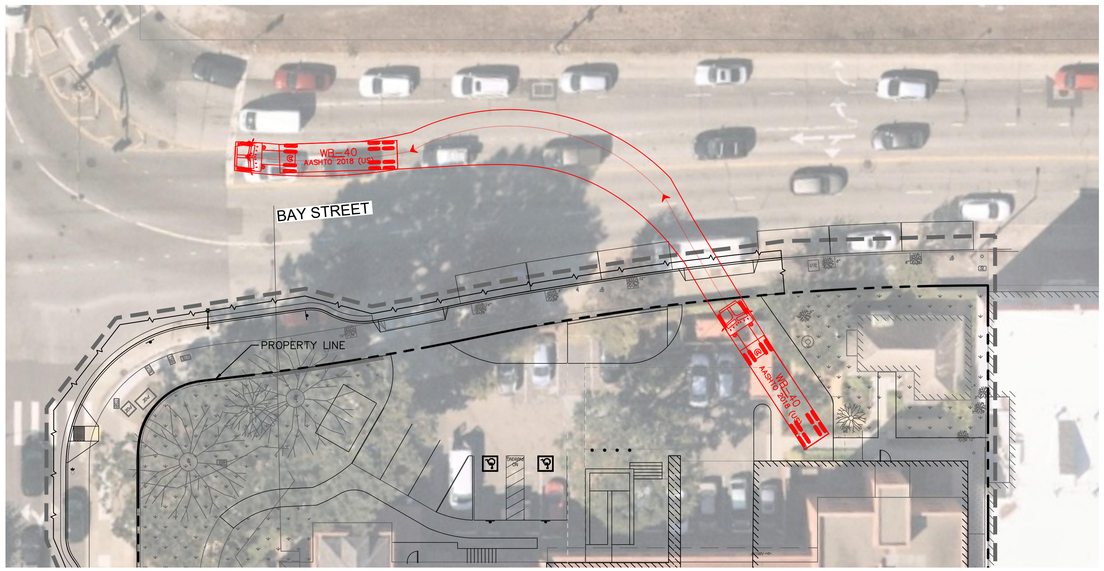
EXISTING LOADING ENTRY



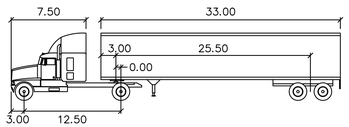
EXISTING LOADING DEPARTURE



PROPOSED LOADING ENTRY



PROPOSED LOADING DEPARTURE



WB-40

	feet		
Tractor Width	: 8.00	Lock to Lock Time	: 6.0
Trailer Width	: 8.00	Steering Angle	: 20.3
Tractor Track	: 8.00	Articulating Angle	: 70.0
Trailer Track	: 8.00		

VEHICLE DATA

WB-40 LOADING TRUCK
HERITAGE ON THE MARINA

NOTE: WB-40 VEHICLE CURRENTLY USED FOR DELIVERIES WEEKLY ON MONDAY AND THURSDAY.

NORTH

GRAPHIC SCALE IN FEET
0 10 20 40

©2023

K:\BAY_JDE\197551001 - Heritage on the Marina - MAF\03 CADD\Exhibits\2023.02.14 - Loading Truck Turns Exhibit\Loading Truck Turns.dwg LOADING TRUCKS (2) Oct 13, 2023

APPENDIX B

SDAT LETTER, DECEMBER 2022 AND SDAT FOLLOW UP EMAIL, JUNE 2023

STREET DESIGN REVIEW

The Street Design Advisory Team (SDAT) is an inter-agency review body that provides street design guidance for projects subject to the streetscape and pedestrian improvement requirements established in the Better Streets Plan, or any project proposing work in the public right-of-way. SDAT includes representatives from The Planning Department, Department of Public Works, Municipal Transportation Agency (SFMTA), San Francisco Fire Department (SFFD), and the San Francisco Public Utilities Commission (SFPUC). SDAT reviewed the proposed project on November 7, 2022, and provides the following comments:

Site Conditions

(See Transportation Info Map http://sftransportationmap.org)

- ☐ Vision Zero Network High Injury
- ☒ Bicycle Network
- ☐ Green Connections Network
- ☐ Muni Corridor
- ☐ Transit Preferential Street
- ☒ Key Walking Street
- ☒ Curb Cut Restriction
- ☐ SFMTA or Public Works Projects

Conditions Requiring Street Design Review

- ☒ Planning Code 138.1 (required streetscape improvements per the Better Streets Plan)
- ☐ Vision Zero

Based on the information provided in the PPA Application:

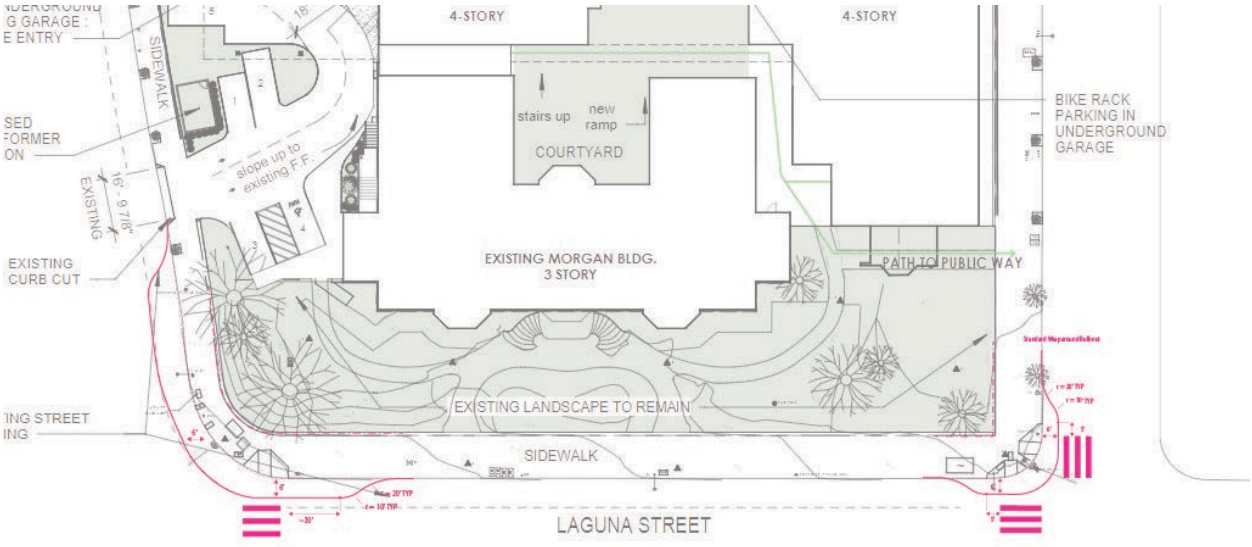
- ☐ **Development Application will not require SDAT review.**
- ☒ **Development Application will require SDAT review.** The proposed project will require SDAT review upon submittal of the first Development Application. Any Development Application for a project requiring SDAT review shall include the required elements for a Streetscape Plan outlined in the Plan Submittal Guidelines here: http://forms.sfplanning.org/Plan_Submittal_Guidelines.pdf

REQUIRED STREETSCAPE FEATURES

Based on a preliminary interagency review, SDAT anticipates the project would be required to install the following streetscape features. Be aware that these recommendations are subject to change.

1. Bulbout (required per Planning Code Sec. 138.1)

- The project is required to install an extended wrap-around bulb-out at the intersection of Laguna Street and Bay Street. The bulb-out should project 6' into both the Laguna and Bay Street ROWs. The bulb out should extend to the existing curb cut on Bay Street.
- The project is also required to install a wrap-around bulb-out at the intersection of Laguna Street and Francisco Street. The bulb-out should project 6' into both Laguna and Francisco Street ROWs.
- Please note, there is an existing accessible parking space (blue zone) on Laguna Street near the intersection of Laguna and Francisco which will need to remain accessible. This will require installation of a curb ramp at the rear of the vehicle pull-up space in the bulb-out transition. Show the blue zone and the curb ramp serving the blue zone in the revised site plan.



- The project is responsible for any utility work associated the construction of the bulb-outs if needed.
- Turn Templates: With your next submission to SDAT, please submit the following turn templates for all bulbouts. Note that turn templates must be approved by SDAT prior to Planning entitlement.
    - Custom SFFD Engine
    - Custom SFFD Ladder

Follow-up for Bulbouts	Pre-entitlement/Next SDAT • Sponsor to submit revised plans to SDAT showing required bulbout(s) and relevant turn templates • Bulbout curb returns shall conform to SF Public Works' Standard Plan for Curb Bulbs. See: http://sfpublicworks.org/sites/default/files/87%2C175.pdf Pre- or Post-entitlement • Obtain relevant permits from BSM www.sfpublicworks.org/services/permits

2. Curb Cuts/ Driveways

- SDAT encourages the project team to consider single directional traffic flow for each of the curb cuts along Bay Street. This would allow for a reduce curb cut width which would minimize conflicts with pedestrian movement. Please note that all exit movements would be right turn only.
- Per Planning Code Section 155(l), driveways crossing sidewalks shall be no wider than necessary for ingress and egress, and shall be arranged, to the extent practical, to minimize the width and frequency of curb cuts, to maximize the number and size of on-street parking spaces available to the public, and to minimize conflicts with pedestrian and transit movements.
- Turn Templates: Vehicles may not be able to enter the proposed western driveway and turn into the proposed parking garage. With your next submission to SDAT, please submit turn templates for passenger vehicles accessing the parking garage to confirm.

3. Off-Street Loading

- Please clarify how the loading dock will work including describing the anticipated volume of delivery trucks, time of day deliveries that are likely to occur and size of vehicles that will serve the project
- The proposed passenger loading zone and accessible parking shall be accessible and comply with the requirements of California Building Code Chapter 11B. There shall be an accessible route from the passenger loading zone to ground-floor entrances. A detectable separation is required to separate the accessible route from the vehicular way (raised curb 4-inch minimum height, 3-ft depth detectable warnings, and/or a railing.

Follow-up for curb cuts, off-street parking and loading	Pre-entitlement/Next SDAT submittal • Include revised plans showing reduced curb cut width • Include revised plans showing a scaled freight vehicle parked within the off-street loading area • Submit loading demand analysis and loading operations plan • Submit turn templates for passenger vehicles accessing the parking garage and trucks accessing the loading dock
Contacts	Coordinate with your assigned Planner

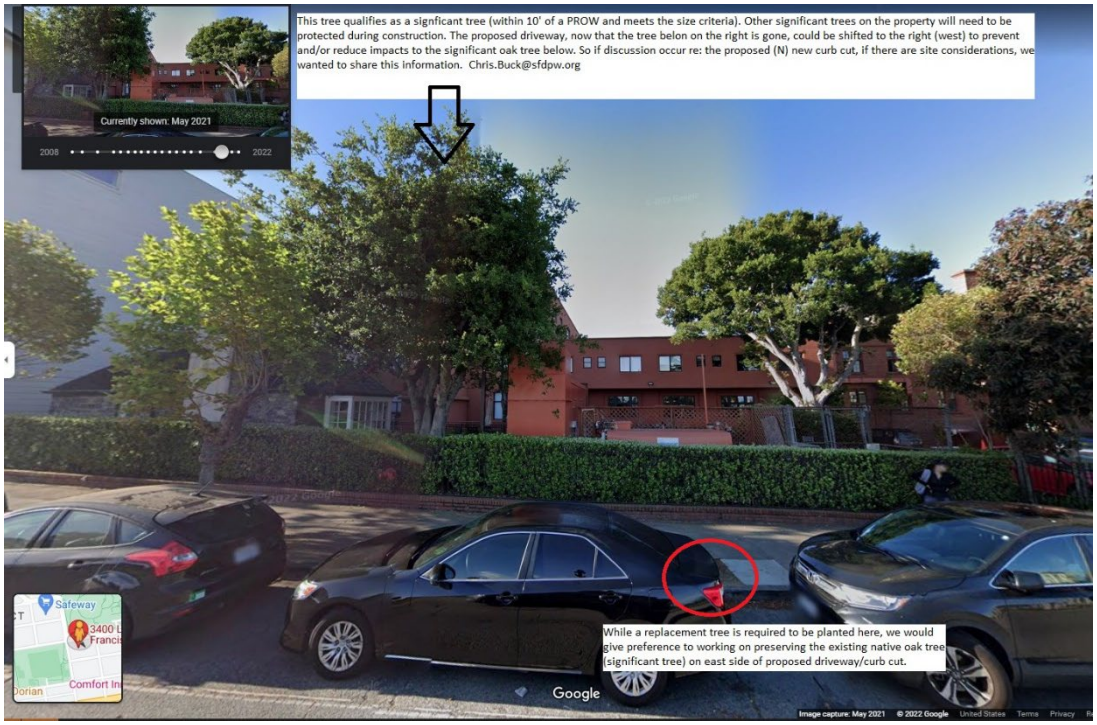
4. On-street Passenger Loading

- The existing passenger loading zones (white zone) on the Laguna Street and Francisco Street frontages shall be accessible and comply with the requirements of California Building Code Chapter 11B and Standard Accessible Passenger Loading Zone Drawings. There shall be an accessible route from the passenger loading zone to ground-floor entrances. The white zone on Laguna Street could also be moved to Bay Street, but this relocation would require coordination with relevant agencies including SFMTA Color Curb Program and Public Works Disability Access Coordinator.
- Refer to Standard Accessible Passenger Loading Zone Drawings for technical requirements: https://sfgov.org/mod/sites/default/files/Documents/Bulletin10_PassengerLoadingZones.pdf
- Show the proposed Accessible Passenger Loading Zone geometry on the revised site plan.
- The sponsor shall set up a meeting with Paul Kniha (paul.kniha@sfmta.com), SFMTA Color Curb Program Manager, and Karina Lairet (karina.lairet@sfdpw.org), Associate Engineer with the Public Works Disability Access Coordinator, to discuss the project's loading needs and corresponding accessibility requirements.

Follow-up	Pre-entitlement/Next SDAT • Sponsor to submit written statement to Planning expressing intention to follow-up on this item • If SDAT requests only Commercial or Passenger Loading, or Accessible Passenger Loading, sponsor to meet with SFMTA Loading Team to coordinate design of loading zone(s). Post-entitlement (Post-Certificate of Occupancy) • Sponsor to apply for on-street loading zones from the SFMTA permits from SFMTA https://www.sfmta.com/online-color-curb-application)
Contacts	Karina Lairet (karina.lairet@sfdpw.org), Associate Engineer with the Public Works Disability Access Coordinator Paul Kniha (paul.kniha@sfmta.com), SFMTA Color Curb Program Manager

5. Street Trees

- The project is required to install street trees along all street frontages. Please coordinate with SF Public Works Bureau of Urban Forestry for guidance on spacing of tree basins.
- The existing trees along Bay and Francisco shall remain unless determined otherwise by SF Public Works Bureau of Urban Forestry (BUF). Any proposed new, removed, or relocated street trees and/or landscaping within the public sidewalk may require a permit from the Bureau of Urban Forestry (BUF).
- Below is a diagram where the new curb cut to the east is proposed to be located. There is a tree that is protected as a significant tree which needs to be preserved (or removal application submitted/permit issued if unable to protect tree). BUF strongly recommends protecting this native oak tree. See diagram below. Possible consideration could also be given to shifting the driveway even a few feet to the west to reduce impacts to this significant oak tree.



Follow-up	Pre-entitlement/Next SDAT • Sponsor to submit written statement to Planning expressing intention to follow-up on this item • Submit plans that differentiate existing trees from new trees • Submit revised plans that address tree placement comments above Post-entitlement • Sponsor to obtain any required permits from Public Works Bureau of Urban Forestry
Contacts	Public Works Bureau of Urban Forestry, urbanforestry@sfdpw.org, 628-652-8733

6. Street Lighting

- If existing lighting conditions on fronting the project site do not meet City standards, the project will be required to upgrade street lighting and/or pedestrian lighting. To determine if lighting improvements are required, the sponsor will need to provide photometric studies for street lighting plans to the SFPUC.

Follow-up	Pre-entitlement/Next SDAT • Sponsor to submit written statement to Planning expressing intention to follow-up on this item and confirm that Sponsor has reviewed the "Standard SDAT Comments" (see the end of this document) Post-entitlement • Projects are required to submit proposed street lighting plans and photometric studies to the Public Works Bureau of Street Use and Mapping (BSM) prior to issuance of the Streetscape Permit
Contacts	SFPUC Streetlights Division, Streetlights@sfwater.org

7. Transformer

- If a new electrical power transformer is required by PG&E to provide power to the building, please continue to show the location of the transformer room on the plans for SDAT review. Should the project wish to install an electrical transformer within the public right-of-way, be aware that sidewalk vaults are considered an exception by SF Public Works Bureau of Street Use & Mapping (BSM).

Follow-up	Pre-entitlement/Next SDAT • Sponsor to show proposed transformer locations on plans to be submitted and approved by SDAT • Coordinate with SFPUC or PG&E to ensure proposed transformer location meets relevant standards.
Contacts	• Transformer Location (ROW v. Private Property): Coordinate with your assigned Current Planner on this item • Transformer Location Technical Feasibility: Coordinate with electrical power utility (SFPUC or PG&E) and Public Works BSM.

ADDITIONAL INFORMATION REQUIRED FOR NEXT SDAT REVIEW

- ☐ Existing/proposed curb cuts and curb cuts to be removed
- ☐ Street names
- ☒ Dimensions of existing and proposed sidewalk and curb extensions on plans
- ☒ Dimensions of existing and proposed curb cuts on plans
- ☐ Dimensions of existing and proposed transit stops
- ☒ Site plan with streetscape features (e.g., bulbouts, trees, transit shelters, benches, bike racks)
- ☒ Proposed street tree locations
- ☐ Adjacent ROW widths
- ☒ Locations of existing utility poles and hydrants
- ☒ Turn templates for bulbouts
- ☐ Curb-to-curb section, including dimensions of tree wells and path of travel
- ☒ Proposed transformer vault location
- ☒ A written statement clarifying that Standard SDAT Comments have been reviewed

STANDARD SDAT COMMENTS

For your next SDAT submittal, please review the “Standard SDAT Comments” which can be found on the SDAT website (https://sfplanning.org/project/street-design-advisory-team), and include a written statement clarifying that this task has been completed and that all plans are consistent with guidelines/standards enumerated in the "Standard SDAT Comments”.

From:	Delumo, Jenny (CPC)
To:	Poling, Jeanie (CPC)
Subject:	FW: NO SDAT needed for 3400 Laguna + notes to convey
Date:	Wednesday, September 20, 2023 11:28:59 AM

Jenny Delumo, AICP (she/hers)
Senior Planner and Transportation Review Team Lead
Environmental Planning Division

San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7568 | www.sfplanning.org
San Francisco Property Information Map

From: Look, Jessica (CPC) <jessica.look@sfgov.org>
Sent: Friday, June 09, 2023 4:12 PM
To: Caldwell, Ben (CPC) <ben.caldwell@sfgov.org>; Horn, Jeffrey (CPC) <jeffrey.horn@sfgov.org>
Cc: Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org>
Subject: Re: NO SDAT needed for 3400 Laguna + notes to convey

comments added to podio..

Jessica Look, AICP | Senior Planner

Citywide Division

San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7455 | www.sfplanning.org
San Francisco Property Information Map

From: Caldwell, Ben (CPC) <ben.caldwell@sfgov.org>
Sent: Wednesday, June 7, 2023 11:36 AM
To: Horn, Jeffrey (CPC) <jeffrey.horn@sfgov.org>; Look, Jessica (CPC) <jessica.look@sfgov.org>
Cc: Shaw, Jeremy (CPC) <jeremy.shaw@sfgov.org>
Subject: NO SDAT needed for 3400 Laguna + notes to convey

Hi Jeff,

We just took a look at 3400 Laguna's resubmittal for possible SDAT next week and there are couple remaining concerns but overall we believe it adequately satisfies our previous SDAT comments for Planning's purposes and therefore does not need to return for a full SDAT 2nd meeting.

Jessica wrote the previous letter, but couldn't make our internal meeting today, so I'm passing along these notes in her stead. We would like to make sure the following 2 comments are conveyed to the project sponsor in your plan check letter:

- The curb radii for both new bulbouts are unnecessarily large and should be reduced. But SDAT will work with Public Works, MTA, and Fire as necessary to address this as best we can without needing to see another submittal. Final design of the curb radii will be ultimately finalized the SIP process.
- Our comment to add trees on all frontages still stands. The sponsor did not add them on the Laguna side. There may be historic preservation issues preventing them from adding them. If so, HP is saying one thing but BUF is saying another. This is in BUF's court now to hammer out with HP and the project sponsor.

Jessica, if you could please add these notes to Accela to document them, that would be much appreciated.

Also note, re: your notes in the calendar sign-up:

- SDAT elected not to say anything about the porte-cochere previously, so we wouldn't do so now.
- We only recommended driveway changes previously, and the changes made are an improvement. Final design of the curb cuts will be worked out during the SIP.

Thanks, and let me know if anyone has questions.

Jeff, if you're all good with the above, please remove the project from the SDAT calendar for next week if you don't mind.

Ben Caldwell, AICP, Urban Designer/Planner
City Design Group/Citywide Planning
San Francisco Planning
49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103
Direct: 628.652.7443 | www.sfplanning.org
San Francisco Property Information Map

APPENDIX C

SAN FRANCISCO TRAVEL DEMAND TOOL, TRIP GENERATION OUTPUT TABLE, JUNE 4, 2024.

Travel Demand: Total Proposed Project (109 units and 71,580 square feet of office (proxy for institutional use)

SAN FRANCISCO TRAVEL DEMAND TOOL INFO

WEBSITE VERSION: 0.3.2
DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 3400 laguna st
District: Marina/WesternMarket
Place Type: Urban medium density
City: San Francisco

SELECTED FILTERS

Time Period: pm
Purpose: work and non-work
Direction: inbound and outbound
Distribution Method: place-type

Average vehicle occupancy

Landuse	District AVO	Place Type	City AVO
Residential	1.3	1.5	1.5
Hotel	1.4	1.5	1.7
Retail	1.4	1.5	1.7
Supermarket	1.4	1.5	1.7
Office	1.2	1.2	1.2
Restaurant	1.4	1.5	1.7
Composite	1.4	1.5	1.7

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Perso	Daily Perso	PM Person	PM Person Trips
Residential	109	Bedrooms	4.5	490.5	0.4	43.6
Hotel	null	Rooms	8.4	0	0.6	0
Retail	0	1K Square	150	0	13.5	0
Supermarket	0	1K Square	297	0	21.7	0
Office	71.58	1K Square	15.7	1123.8	1.4	100.2
Restaurant	0	1K Square	200	0	27	0
Composite	0	1K Square	600	0	81	0
Total				1614.3		143.8

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Shu	Walk	Bike
Residential	0.389	0.035	0.19	0.003	0.343	0.039
Hotel	0.269	0.157	0.147	0.042	0.384	0
Retail	0.259	0.014	0.118	0.005	0.576	0.028
Supermarket	0.259	0.014	0.118	0.005	0.576	0.028
Office	0.374	0.111	0.186	0.129	0.171	0.028
Restaurant	0.259	0.014	0.118	0.005	0.576	0.028
Composite	0.259	0.014	0.118	0.005	0.576	0.028

Total Trips by Mode

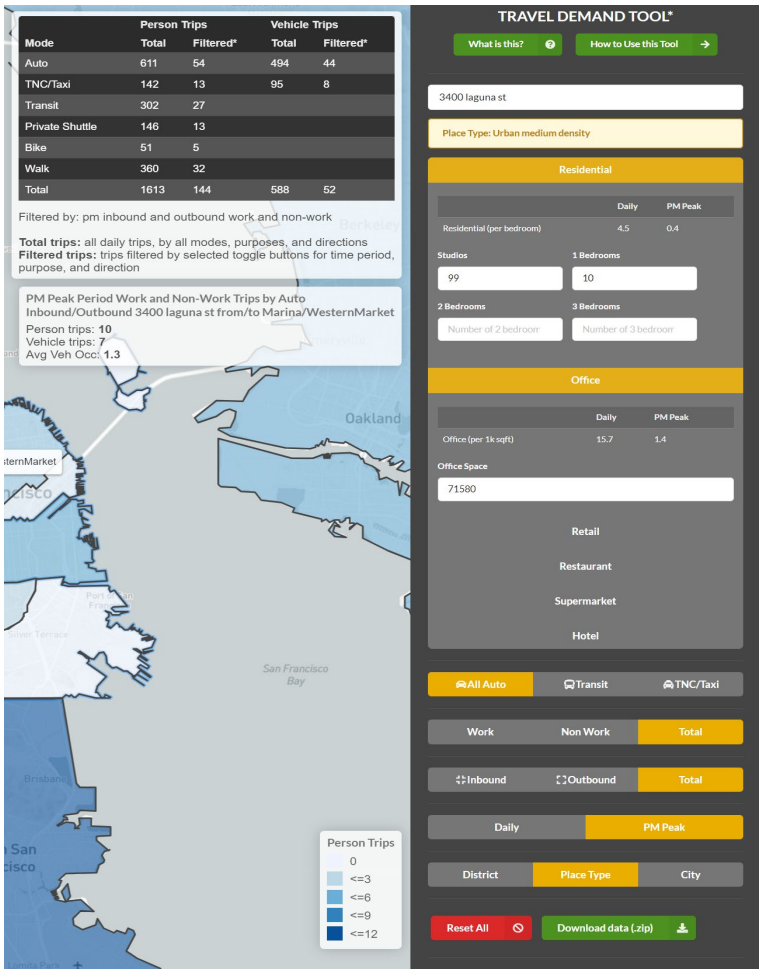
Mode	Total Perso	Filtered Pe	Total Vehic	Filtered Vehicle Trips
Auto	611.1	54.4	493.6	44
TNC/Taxi	141.9	12.6	94.6	8.4
Transit	302.2	26.9		
Private Shuttle	146.4	13.1		
Walk	360.4	32.1		
Bike	50.6	4.5		
Total (in bold)	**1613**	**144**	**588**	**52**

auto Person Trips Distribution by District

Landuse	Downtown	SoMa	Marina/W	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	1.3	0.7	5.8	2.6	0.1	1.4	0.5	0	2	0.7	0.6	1.3
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermarket	0	0	0	0	0	0	0	0	0	0	0	0
Office	3.2	0.6	4.1	3.6	0.1	3.1	3	0	10	5.3	2.5	1.8
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	4.5	1.3	9.9	6.2	0.2	4.5	3.5	0	12	6	3.1	3.1

auto Vehicle Trips Distribution by District

Landuse	Downtown	SoMa	Marina/W	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	0.9	0.5	4	1.8	0.1	0.9	0.3	0	1.4	0.5	0.4	0.9
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermarket	0	0	0	0	0	0	0	0	0	0	0	0
Office	2.8	0.5	3.5	3.1	0.1	2.7	2.6	0	8.7	4.6	2.2	1.6
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	3.6	1	7.5	4.9	0.2	3.7	2.9	0	10	5.1	2.6	2.4



Travel Demand: New New Additions (23 units and 43,620 square feet of office (proxy for institutional use)

SAN FRANCISCO TRAVEL DEMAND TOOL INFO

WEBSITE VERSION: 0.3.2
DATA VERSION: 0.3

PROJECT LOCATION ATTRIBUTES

Address: 3400 Laguna
District: Marina/WesternMarket
Place Type: Urban medium density
City: San Francisco

SELECTED FILTERS

Time Period: pm
Purpose: work and non-work
Direction: inbound and outbound
Distribution Meth place-type

Average vehicle occupancy

Landuse	District AVO	Place Type	City AVO
Residential	1.3	1.5	1.5
Hotel	1.4	1.5	1.7
Retail	1.4	1.5	1.7
Supermarket	1.4	1.5	1.7
Office	1.2	1.2	1.2
Restaurant	1.4	1.5	1.7
Composite	1.4	1.5	1.7

Total Trips Generated by Land Use and Time

Landuse	Amount	Unit	Daily Perso	Daily Perso	PM Person	PM Person Trips
Residential	23	Bedrooms	4.5	103.5	0.4	9.2
Hotel	null	Rooms	8.4	0	0.6	0
Retail	0	1K Square I	150	0	13.5	0
Supermarket	0	1K Square I	297	0	21.7	0
Office	43.62	1K Square I	15.7	684.8	1.4	61.1
Restaurant	0	1K Square I	200	0	27	0
Composite	0	1K Square I	600	0	81	0
Total				788.3		70.3

Mode Split Distribution

Landuse	Auto	TNC/Taxi	Transit	Private Shu	Walk	Bike
Residential	0.389	0.035	0.19	0.003	0.343	0.039
Hotel	0.269	0.157	0.147	0.042	0.384	0
Retail	0.259	0.014	0.118	0.005	0.576	0.028
Supermarket	0.259	0.014	0.118	0.005	0.576	0.028
Office	0.374	0.111	0.186	0.129	0.171	0.028
Restaurant	0.259	0.014	0.118	0.005	0.576	0.028
Composite	0.259	0.014	0.118	0.005	0.576	0.028

Total Trips by Mode

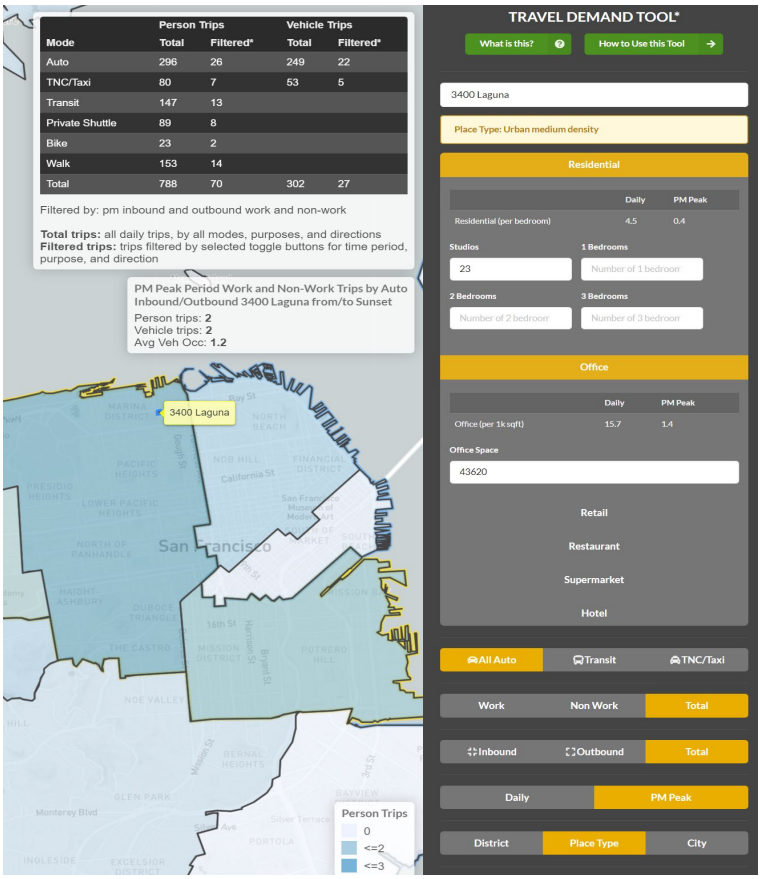
Mode	Total Persc	Filtered Pe	Total Vehic	Filtered Vehicle Trips
Auto	296.4	26.4	249	22.2
TNC/Taxi	79.6	7.1	53.1	4.7
Transit	147	13.1		
Private Shuttle	88.7	7.9		
Walk	152.6	13.6		
Bike	23.2	2.1		
Total (in bold)	**788**	**70**	**302**	**27**

auto Person Trips Distribution by District

Landuse	Downtown SoMa		Marina/We	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	0.3	0.2	1.2	0.5	0	0.3	0.1	0	0.4	0.1	0.1	0.3
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermarket	0	0	0	0	0	0	0	0	0	0	0	0
Office	2	0.4	2.5	2.2	0.1	1.9	1.9	0	6.1	3.2	1.5	1.1
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	2.2	0.5	3.7	2.8	0.1	2.2	1.9	0	6.5	3.4	1.7	1.4

auto Vehicle Trips Distribution by District

Landuse	Downtown SoMa		Marina/We	Mission/	Bayshore	Richmond	Sunset	Islands	South Bay	East Bay	North Bay	OuterMission/Hills
Residential	0.2	0.1	0.8	0.4	0	0.2	0.1	0	0.3	0.1	0.1	0.2
Hotel	0	0	0	0	0	0	0	0	0	0	0	0
Retail	0	0	0	0	0	0	0	0	0	0	0	0
Supermarket	0	0	0	0	0	0	0	0	0	0	0	0
Office	1.7	0.3	2.1	1.9	0.1	1.7	1.6	0	5.3	2.8	1.3	1
Restaurant	0	0	0	0	0	0	0	0	0	0	0	0
Composite	0	0	0	0	0	0	0	0	0	0	0	0
Total	1.9	0.4	3	2.3	0.1	1.9	1.7	0	5.6	2.9	1.4	1.1



Freight Delivery Information Provided by Project sponsor

	M	T	W	Th	F	S	S
Vendor 1	--	30-45 min	--	--	30-45 min	--	
Vendor 2	30 min	--	30 min	30 min	--	30 min	
Vendor 3	15 min (5:30 am)	--	--	15 min (5:30 am)	--	15 min (5:30 am)	
Vendor 4	30-45 min						
Vendor 5	Once per month, day varies, 30-45 min						
Vendor 6	Less than once per month, day varies, 20 min						

Note: Delivery times are variable with each vendor. Vehicle lengths are consistent by vendor. The largest vehicles are 26 foot single axle trucks, the smallest are commercial delivery vans.

Maneuvering: [Bay] street is generally not closed for any length of time. The time the street is blocked is just time enough to line up and back the truck to the dock. Following construction of our proposed project, this maneuver will be slightly different with the new layout of the building, but again the street impact will be the same or less with the angle of the new dock.There is not a flagger. Trucks block traffic for a short time while they align with the dock. Once they back in there is no blocking of the street.

Passenger and Freight Loading Demand using San Francisco Transportation Impact Analysis Guidelines

1 What is the total square fotage per land use?

Office	71,580	new total
Residential	70,000	new total

2 What are the land use loading demand rates

Office	0.21	per 1000sf
Residential	0.03	per 1000sf

3 What is the daily delivery trip demand rate calcuation (turnover) - R

Office	15.0318
Residential	2.1

4 What is the average hour loading demand

Office	0.70	
Residential	0.10	
	0.793	1 space

5 What is the peak hour loading demand

Office	0.87	
Residential	0.12	
	0.99	1 spaces

APPENDIX D

HERITAGE ON THE MARINA CORRESPONDENCE, JUNE 2024

RE: 3400 Laguna - additional data request for sponsor team

Murphy, Alan H. (Perkins Coie) <AMurphy@perkinscoie.com>

Mon 6/3/2024 4:25 PM

To:Theresa Wallace <Theresa.Wallace@lsa.net>;Calpin, Megan (CPC) <megan.calpin@sfgov.org>;Eric Jacobs <eric@gbasf.com>; Frank Rockwood <frank@rockwoodpacific.com>
Cc:Range, Jessica (CPC) <jessica.range@sfgov.org>;Brent Rosenwald <Brent.Rosenwald@lsa.net>

2 attachments (1 MB)

HOTM Delivery Memo Rev 1.pdf; SDAT_3400 Laguna_ 2022_12_2.pdf;

Hi all,

This email responds to Megan's five data requests for transportation analysis, below. Our responses follow each item in bold. Under separate cover, either later today or tomorrow, we'll provide responses to the items in the Excel spreadsheet Theresa circulated on Friday.

From Megan: I have a few additional data requests for transportation analysis. Could you please:

- separate out, if possible, the square footage of residential care *units from the common institutional gross square footage?* Please also clarify how many of the 109 residential care suites are single or double occupancy.
  [Yes. As you know, there is no distinction in land use between these types of areas. That said, solely for purposes of obtaining a more accurate transportation analysis, the project will include approximately 70,000 square feet within residential care units, while the remainder of project square footage will be common institutional space. Of the 109 total units, approximately 10 may have double occupancy.]
- describe existing loading conditions and operations - is there a flagger for the truck backing in to the loading space and at what time of day do these type of deliveries occur? How many deliveries per day? Are the hours of delivery consistent or variable? Are the vehicle types consistent or variable?
  [Please see the attached memo from Jon Casey.]
- clarify the existing closures on Bay Street that occur due to loading - of the 9 closures, how long is the average closure for? (30 minutes each?)
  [Please see the attached memo from Jon Casey.]
- provide documentation of meetings / communications with SFMTA regarding accessible passenger loading or other SDAT related comments for my records.
  [There have not yet been communications with SFMTA regarding passenger loading. For your records, please see the attached SDAT memo.]
- provide the length of the proposed porte cochere loading space.
  [Over 20 feet of passenger loading space would be available beneath the proposed porte cochere. Two cars could be loaded undercover, side-by-side. There also would be space for four additional cars to queue in the new driveway outside the covered loading area.]

Please let us know if you have any further questions on these items.

Alan

Alan Murphy | **Perkins Coie LLP**
PARTNER
505 Howard Street, Suite 1000
San Francisco, CA 94105-3204
D. +1.415.344.7126
E. AMurphy@perkinscoie.com

MEMO
Prepared by Jon Casey, CFO / Compliance Officer
May 30, 2024

Regarding questions from San Francisco Planning on loading conditions and operations, and street closures due to loading at Heritage on the Marina.

Specifically, this memo will answer the following two questions:

1. Describe existing loading conditions and operations:
    a. Is there a flagger for the truck backing into the loading space and at what time of day do these type of deliveries occur?
    b. How many deliveries per day?
    c. Are the hours of delivery consistent or variable?
    d. Are the vehicle types consistent or variable?
2. Clarify the existing closures on Bay Street that occur due to loading - of the 9 closures, how long is the average closure for? (30 minutes each?)

Response to question 1:

    a. There is not a flagger. Trucks block traffic for a short time while they align with the dock. Once they back in there is no blocking of the street. The delivery times vary depending on the vendor and the individual delivery.
    b. Please see the schedule below.
    c. Variable with the vendor and the deliveries for that day
    d. Consistent by vendor. The largest vehicles are 26 foot single axle trucks, the smallest are commercial delivery vans.

Here are details on current deliveries received throughout the week on the following customary delivery schedule:

Sysco: frequency of delivery, Tues & Fri, time spent at the location ~30-45 mins
Vesta: frequency of delivery, Mon, Wed, Thurs & Sat, time spent at the location ~30 mins
Le Boulanger: frequency of delivery, Mon, Thurs & Sat, time spent at the location ~15 mins, early morning ~5:30am.

Alsco: frequency of delivery, Mon & Thurs, time spent at the location ~30-45 mins
Waxie: frequency of delivery, once per month, day varies, time spent at location ~30-45 mins
Alhambra Water: frequency of delivery less than once a month, time spent at location ~20 mins

Question 2:

The street is generally not closed for any length of time. The time the street is blocked is just time enough to line up and back the truck to the dock. Following construction of our proposed project, this maneuver will be slightly different with the new layout of the building, but again the street impact will be the same or less with the angle of the new dock.

If there are any additional details required for this request, please let us know.