San Francisco Planning

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PUBLIC NOTICE

NOTICE OF AVAILABILITY OF AND INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

PROJECT INFORMATION

Date:	December 10, 2025
Project Title:	JFCS Holocaust Center
Project Address:	2245-2255 Post Street
Case No.:	2024-011443ENV
Block/Lot No.:	1078/021, 1078/020
Zoning District(s):	NC-3 (Neighborhood Commercial, Moderate Scale) Use District 65-A Height and Bulk District
Neighborhood:	Western Addition

Project Sponsor:	Greg Murphy 510.542.0839 gsm.const.mgr@gmail.com
Environmental Case Coordinator:	Josh Pollak 628.652.7493 josh.pollak@sfgov.org

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

Project Description

A PMND 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 project site is comprised of two adjacent parcels: a 4,468-square-foot parcel located at 2245 Post Street and a 4,464-square-foot parcel at 2255 Post Street (Assessor's Block 1078 and Lots 021 and 020, respectively). The building located at 2245 Post Street contains the Jewish Family and Children's Services (JFCS) Holocaust Center, which is a division of the nonprofit organization Jewish Family and Children's Services (JFCS). Its mission is to ensure the lessons of the Holocaust are remembered and taught, fostering awareness of antisemitism, racism, and genocide while inspiring moral courage and social responsibility in future generations. The building at 2255 Post Street is vacant but previously contained a medical office.

The project sponsor, JFCS, proposes to redevelop the entire project site. The proposed 2245-2255 Post Street project (JFCS Holocaust Center, proposed project) would demolish the two existing adjacent buildings on

the project site and construct a four-story, approximately 60-foot-tall building (68 feet and 6 inches total, including rooftop mechanical equipment), with one below-grade level.

The new building, which would extend over the entire project site, would be approximately 34,073 gross square feet in size, and would replace the existing JFCS Holocaust Center with a larger building that would include rooms for public exhibitions, a lecture hall, library, offices, large and smaller-group educational and conference spaces as well as the JFCS Holocaust Center's archives. The proposed project would include no vehicular parking. Project construction is anticipated to last approximately 21 months.

The document is a PMND, containing information about the possible environmental effects of the proposed project. The PMND documents the determination by the Planning Department that the proposed project could not have a significant adverse effect on the environment. The publication of this environmental document does not indicate a decision by the City to approve or disapprove the proposed project.

Purpose of Notice

The PMND is available to view or download from the Planning Department's Negative Declarations and EIRs web page (http://www.sfplanning.org/sfceqadocs). Paper copies are also available at the Planning counter of the San Francisco Permit Center on the second floor of 49 South Van Ness Avenue, San Francisco.

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 John Dacey, john.dacey@sfgov.org, or 628.652.7415. If you have questions concerning environmental review of the proposed project, contact the Planning Department staff contact listed above.

You are not required to take any action. If you wish to comment on the adequacy of the PMND, within 20 calendar days following publication of the PMND (by 5:00 p.m. on December 31, 2025), any person may:

1. Make recommendations for amending the text of the document. The text of the PMND may be amended to clarify or correct statements and may be expanded to include additional relevant issues or to cover issues in greater depth. This may be done **without** the appeal described below; **OR**

2. Appeal the determination of no significant effect on the environment to the Planning Commission in a letter which specifies the grounds for such appeal, accompanied by a $787 check (effective August 29, 2025) payable to the San Francisco Planning Department.[1] An appeal requires the Planning Commission to determine whether or not an Environmental Impact Report must be prepared based upon whether or not the proposed project could cause a substantial adverse change in the environment. To file, send the appeal letter to the Planning Department, Attention: Lisa Gibson, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103 or emailed to lisa.gibson@sfgov.org and **must be received by 5:00 p.m. on**

1 Upon review by the Planning Department, the appeal fee may be reimbursed for neighborhood organizations that have been in existence for a minimum of 24 months.

December 31, 2025.

In the absence of an appeal, the mitigated negative declaration shall be made final, subject to necessary modifications, after 20 days from the date of publication of the PMND. If the PMND is appealed, the Final Mitigated Negative Declaration (FMND) may be appealed to the Board of Supervisors. The first approval action, as identified in the initial study, would establish the start of the 30-day appeal period for the FMND pursuant to San Francisco Administrative Code Section 31.16(d).

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. 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.

Date: **12/10/2025**

The San Francisco Planning Department is studying a project's potential environmental effects and welcomes your comments. The enclosed notice concerns a project located at **2245-2255 Post Street (2024-011443ENV)**. The other side of this page describes the environmental review process under state law. You may provide comments by **12/31/2025** or request future project updates from the staff contact indicated in the attached notice.

To obtain information about this notice in Spanish, Chinese, or Filipino, please call **628.652.7550**. Please be advised that the Planning Department will require at least one business day to respond to any call.

三藩市規劃局 (San Francisco Planning Department) 正在研究一項專案的潛在環境影響，歡迎大家踴躍提出意見。本函所附的通知書涉及位於 **2245-2255 Post Street (2024-011443ENV)** 的專案。本頁背面對加州法律規定的環境影響審核流程做了詳細說明。請於 **12/31/2025** 日之前針對本案提出評論，或者向本函所附通知書中指定的聯絡人提出要求，繼續瞭解專案的最新發展。

請致電 **628.652.7550** 以索取通知書中文版本資訊。請注意，規劃局需要至少一個工作天才能回電。

El Departamento de Planificación está estudiando los posibles efectos medioambientales de un proyecto y desea saber su opinión. El aviso incluido concierne a un proyecto ubicado en **2245-2255 Post Street (2024-011443ENV).** Al reverso de esta página se describe el proceso de análisis medioambiental según la ley estatal. Usted puede entregar sus opiniones y comentarios a más tardar el **12/31/2025** o solicitar futuras actualizaciones sobre el proyecto al contacto indicado en el aviso adjunto.

Para obtener información sobre este aviso en español, llame al **628.652.7550**. Le informamos que el Departamento de Planificación necesitará por lo menos un día hábil para responder cualquier llamada.

Pinag-aaralan ng Kagawaran ng Pagpaplano ng San Francisco ang mga potensyal na epekto sa kapaligiran ng isang proyekto at tinatanggap ang iyong mga komento. Ang nakapaloob na paunawa ay patungkol sa isang proyekto na matatagpuan sa **2245-2255 Post Street (2024-011443ENV).** Inilalarawan ng kabilang panig ng pahinang ito ang proseso ng pagsusuri sa kapaligiran sa ilalim ng batas ng estado. Maaari kang magbigay ng mga komento sa **12/31/2025** o humiling ng mga bagong kaalaman sa proyekto sa hinaharap mula sa pagkontak sa kawani na nakalagay sa kalakip na abiso.

Upang makakuha ng impormasyon tungkol sa paunawang ito sa Filipino, mangyaring tumawag sa **628.652.7550**. Mangyaring maabisuhan na ang Kagawaran ng Pagpaplano ay mangangailangan ng kahit isang araw ng may trabaho o pasok upang tumugon sa anumang tawag.

INITIAL STUDY

2245-2255 Post Street (JFCS Holocaust Center)

Planning Department Case No. 2024-011443ENV

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A. Project Description

Existing Project Site and Uses

The project site is comprised of two adjacent parcels: a 4,468-square-foot parcel located at 2245 Post Street and a 4,464-square-foot parcel at 2255 Post Street (Assessor's Block 1078 and Lots 021 and 020, respectively). The project site is located on the south side of Post Street on the block bound by Post Street on the north, Scott Street to the east, Geary Boulevard to the south, and Divisadero Street to the west, in the Western Addition Neighborhood. **Figure 1**, below, shows the project site location map.

The two-story, 6,388-square-foot building located at 2245 Post Street contains the Jewish Family and Children's Services (JFCS) Holocaust Center, which is a division of the nonprofit organization Jewish Family and Children's Services (JFCS). Its mission is to ensure the lessons of the Holocaust are remembered and taught, fostering awareness of antisemitism, racism, and genocide while inspiring moral courage and social responsibility in future generations. The Holocaust Center currently has a range of 3 to 10 employees on site on a daily basis. The two-story, 7,800-square-foot building located at 2255 Post Street is vacant but previously contained a medical office. There are no vehicular parking spaces associated with either building, and two Class II bicycle parking spaces.[1] The project site is currently almost entirely covered with the building footprints and impervious surfaces, apart from a small stand of trees along rear edge of the 2245 Post Street lot.

Project Characteristics

The project sponsor, Jewish Family and Children's Services (JFCS), proposes to redevelop the entire project site. The proposed 2245-2255 Post Street project (JFCS Holocaust Center, proposed project) would demolish the two existing adjacent buildings on the project site and construct a four-story, approximately 60-foot-tall building (68 feet and 6 inches total, including rooftop mechanical equipment), with one below-grade level. The new building, which would extend over the entire project site, with the front of the building reaching the property line, would be approximately 34,073 gross square feet in size, and would replace the existing JFCS Holocaust Center with a larger building that would include rooms for public exhibitions, a lecture hall, library, offices, large and smaller-group educational and conference spaces as well as the JFCS Holocaust Center's archives. The proposed project would include no vehicular parking and would include fourteen Class I and four Class II bicycle parking spaces. The proposed project would be an all-electric building with no natural gas uses and would include a solar ready zone[2] on the roof. **Table 1**, below, shows the proposed project characteristics.

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[1] Class I spaces are "spaces in secure, weather-protected facilities intended for use as long-term, overnight, and work-day bicycle storage by dwelling unit residents, nonresidential occupants, and Employees." Class II spaces are "spaces located in a publicly-accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use."

[2] Solar ready zones refer to a section of the roof designated and reserved for the installation of a solar electric or solar thermal system as required section 149 of the planning code.

FIGURE 1 **LOCATION MAP**



FIGURE 2 **SITE PLAN**

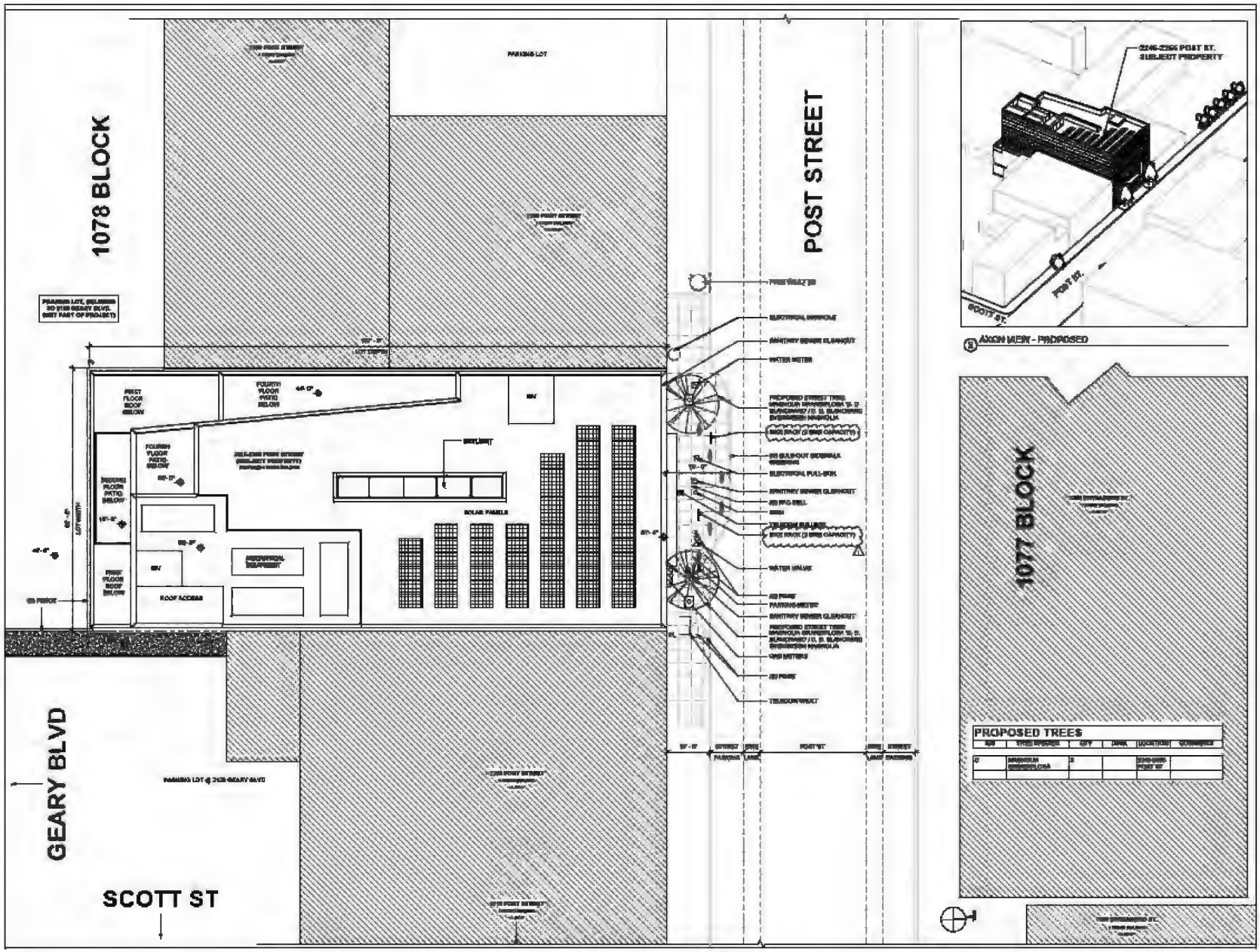
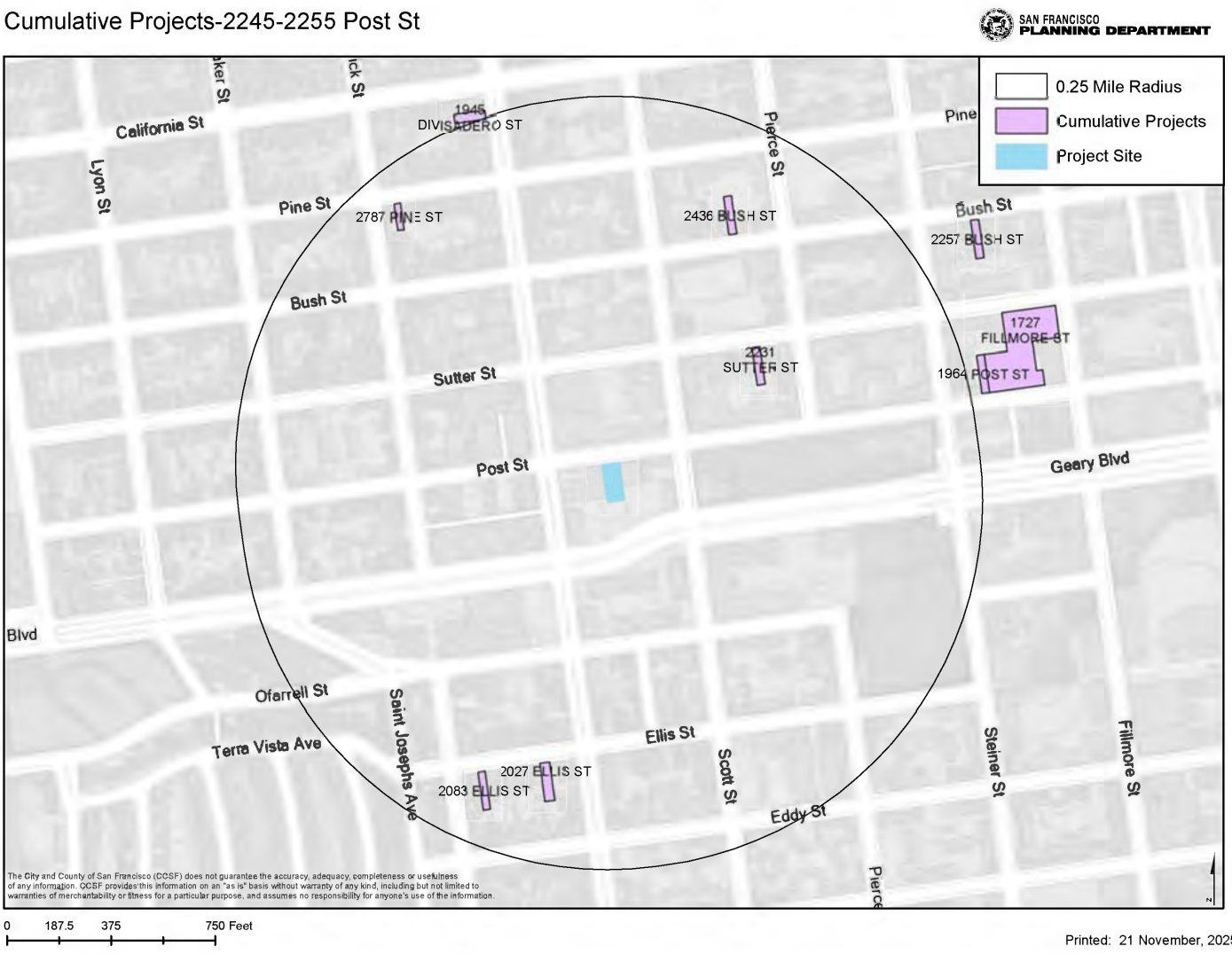


FIGURE 3 **FAÇADE RENDERING**



FIGURE 4 CUMULATIVE PROJECTS



The new building would have an approximately 10-foot upper-level setback in the rear to accommodate a patio on the second floor. There would also be two patio spaces on the fourth floor: a roughly triangular-shaped patio on the western edge of the project site and an additional patio on the southern side of the fourth floor.

The lowest (below-grade) level would be approximately 6,400 gross square feet in size and would include a utilities room, storage, archives, a trash room, and an electric/server room. The first floor would be approximately 8,100 gross square feet and would include the primary pedestrian entrance (on Post Street), a lobby area with a security desk, two gallery areas, an exhibition hall, and a lecture/screening room. The second floor would be approximately 6,100 gross square feet and would include openings to the lobby and an atrium space, three exhibition rooms, restrooms, a café and a patio. The third floor would be approximately 7,500 gross square feet and would include office space, conference rooms, work rooms, phone rooms, and restrooms. The fourth floor would be approximately 6,700 gross square feet and would include a library, a community room, flex rooms, and office spaces, and two patio areas with a combined total of approximately 700 square feet.

The roof would include the solar ready zone described above, a skylight for the lightwell, mechanical equipment and elevator overruns. The proposed project would have an estimated total of 25 to 40 employees on site, which would consist of approximately 20 to 30 employees to support cultural/institution/educational uses and approximately 4 to 6 employees to support other uses, such as the café, visitor experience, security and maintenance.

Table 1 **Proposed Project Characteristics**

Project Component (square feet except where noted)	Existing	Proposed	Net Change
Office Use	7,800	0	-7,800
Cultural/Institutional/Educational Use	6,388	34,073	+27,685
Number of Buildings	2	1	-1
Number of Stories	2	4	+2
Vehicular Parking	0	0	0
Class One Bicycle Parking	0	14	+14
Class Two Bicycle Parking	2	4	+2

Site Circulation and Events

As noted above, pedestrian access to the existing JFCS Holocaust Center would be provided through the main entrance located at 2245 Post Street. The proposed entrance would include a bulb-out with bollards. Along the project frontage, the sponsor is proposing two metered parking spaces and a roughly 30-foot-long passenger loading zone west of the project site. East of the project site, at 2233 Post Street, is a medical building with an existing approximately 40-foot-long passenger loading zone. **Figures 2** and **3**, below, show a site plan, and a rendering of the façade, respectively.

The proposed project would include a bulb-out with bollards and two street trees. The proposed project would lengthen the existing 40-foot-long passenger loading zone east of the project site to a 60-foot-long passenger loading zone, subject to review and approval by SFMTA. The proposed project would remove the four street trees along Post Street, subject to review and approval by San Francisco Public Works, and would plant two new street trees along the project frontage.

Table 1 **2025 Existing Event Scheduling and Attendance**

Event Type	Days	Time of Day	Maximum Attendance	Maximum Frequency
Board, Council, or Committee Meetings	Weekdays	Evenings	40	Monthly
Quarterly Holiday Events	Weekdays/Weekends	Afternoon/Evenings	70	Quarterly

The existing JFCS Holocaust Center currently hosts organizations meeting and quarterly holiday events (see **Table 2** above). The proposed new JFCS Holocaust Center would host additional meetings and events (see **Table 3** below), which would include programming for major lectures, film screenings, and weekly Shabbat services. The center would also host regular visits from school groups, workshops, public programs, and additional small group meetings and individual appointments.

Table 2 **2029 Proposed Event Scheduling and Attendance**

Event Type	Days	Time of Day	Maximum Attendance	Maximum Frequency
Major Lectures (Supporters/Donors)	Weekdays	Evenings	75	1-2 times per month
Film Screenings	Weekdays	Evenings	60	1-2 times per month
Memory Care Shabbat Services	Fridays	Evenings	50	Weekly
School Group Visits	Weekdays	Morning/Midday	100	20-30 per year
Workshops	Weekdays	Morning/Afternoon	30	5-10 per year
Public Programs	Any	Afternoon/Evening	125	5-8 per year
General Public Visits	Any	Varies	25	10-25 per day
Small Group Meetings (Internal/External)	Weekdays	Varies	15	20-30 per year
Individual Visitors/Researchers	Weekdays	By appointment	30	20-30 per month

Construction

Project construction is anticipated to last approximately 21 months. Building demolition would take approximately two months, site preparation and grading would take approximately two months, and

building construction would take approximately sixteen months, while the remainder of the time (approximately one month) would include architectural coating and finishing, as well as paving. The building would be supported by a spread footing foundation (though a mat foundation may be used in lieu of footings in a portion or underlying all of the building) and would require a maximum depth of approximately 18 feet of excavation over an area of 8,700 square feet, for a total excavation of approximately 5,600 cubic yards.

Project Approvals

The proposed 2245-2255 Post Street project would require the following approvals:

Actions by the Board of Supervisors

- Approval of Planning Code and zoning map amendments to establish a Special Use District to allow for a Planned Unit Development Conditional Use Authorization, as well as modifications of Planning Code requirements regarding non-residential use size limits, floor area ratio, bulk limits, active uses, street frontage controls, streetscape improvements, awnings, signage and impact fee deferral.

Actions by the Planning Commission

- Recommendation to the San Francisco Board of Supervisors to approve Planning Code and zoning map amendments adopting a Special Use District and associated zoning map amendments.
- Conditional Use Authorization pursuant to proposed Special Use District.
- General Plan Referral for the proposed bulb out.

Actions by Department of Building Inspection

- Approval of demolition and building permits.

Actions by Department of Public Works

- Approval of permits for sidewalk modifications in the public right-of-way.
- Approval of new and removed street trees.
- Approval of encroachment permits for private project improvements in the public right-of-way, including a transformer vault.
- Approval of street space permit.

Actions by San Francisco Municipal Transportation Agency

- Approval of curb zone changes.
- Approval of special traffic permit.

Actions by San Francisco Public Utilities Commission

- Approval of a stormwater control plan.

Approval Action: The approval of the Conditional Use Authorization constitutes the approval action for the project. The approval action date establishes the start of the 30-day appeal period for this California Environmental Quality Act (CEQA) determination pursuant to section 31.04(h) of the San Francisco Administrative Code.

B. Project Setting

Project Site and Surrounding Land Uses

The project site is located in the Western Addition neighborhood, mid-block on the southern side of Post Street with Scott Street to the east, Geary Boulevard to the south, and Divisadero Street to the west. The project vicinity is generally flat. The surrounding neighborhood consists of a mix of one- to seven-story medical office buildings and labs, with multi-family residential buildings further away from the project site. The neighborhood's buildings date from the 1880s through 2000 and consist of a variety of styles. There is no consistent setback of the buildings from the sidewalk and no consistent building eight or massing, with a mixture of one- to seven-story buildings.

Sensitive land uses near the project site include an assisted living facility located northeast of the site at the corner of Post and Scott streets, residences northwest of the site at the corner of Sutter and Divisadero streets, medical buildings both east and west of the project site on Post Street, and the UCSF Medical Center at Mount Zion, across Post Street from the project site.

The project site is a block north of Geary Boulevard, which is a major east-west thoroughfare. Geary Boulevard is served by the 38- and 38R-Geary MUNI bus lines, while Divisadero Street is served by the 22-Fillmore bus line. East of the project site across Scott Street is the Western Addition Library, which is adjacent to the Hamilton Recreation Center, a Recreation and Parks Department park that includes soccer fields, a basketball court, a playground and an aquatic center.

The project site is located in the 65-A Height and Bulk District, and is the NC-3 (Neighborhood Commercial, Moderate Scale) Zoning District. The 65-A Height and Bulk District has a roof height limit of 65 feet and includes dimension requirements of length of 110 feet and a diagonal dimension of 125 feet above the 40 feet in height. Per Planning Code Section 712, NC-3 Districts are intended to offer a wide variety of comparison and specialty goods and services to a population greater than the immediate neighborhood, additionally providing convenience goods and services to the surrounding neighborhoods. NC-3 Districts are linear districts located along heavily trafficked thoroughfares which also serve as major transit routes. Buildings typically range in height from two to four stories with occasional taller structures. NC-3 building standards permit moderately large commercial uses and buildings.

Cumulative Context

CEQA Guidelines section 15130(b)(1) provides two methods for cumulative impact analysis: the "list-based approach" and the "projections-based approach." The list-based approach uses a list of projects (within approximately a quarter-mile radius of the project site and for which the Planning Department has a project application on file) producing closely related impacts that could combine with those of a proposed project to evaluate whether the project would contribute to significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This analysis employs both the list-based and projections-based approaches, depending on which approach best suits the resource topic being analyzed.

The cumulative analysis for certain localized impact topics (e.g., cumulative shadow and wind effects) uses the list-based approach. The following is a list of reasonably foreseeable projects within the project vicinity (approximately one-quarter mile) that are included:[3]

- **2436 Bush Street (Case No. 2022-008647PRJ):** Convert the existing accessory structure at the rear of the property into one accessory dwelling unit (ADU).
- **1964 Post Street (Case No. 2023-003690PRJ):** Add two new ADUs to the ground floor of the building.
- **1947 Divisadero (Case No. 2025-005199PRJ):** Convert four office suites into residential units.
- **2235 Sutter Street (Case No. 2022-006648PRJ):** Add two new ADUs on the ground floor of the building.
- **2257-2259 Bush Street (Case No. 2024-005540PRJ):** Raise a two-story building to create a four story building with three residential units. Construct a new four-story building with four residential units.
- **2045 Sutter Street (Case No. 2021-012554ENV):** Add a fifth floor and new elevators to two existing buildings that are 100 percent affordable housing, which would add a total of 28 new units.
- **2787 Pine Street (Case No. 2024-002537PRJ):** Convert the existing basement rooms to a one-unit ADU.
- **2083 Ellis Street (Case No. 2024-009056PRJ):** Demolition of a single-family residence and construction of a new building with nine new residential units.
- **2027 Ellis Street (Case No. 2020-010388PRJ):** Add two ADUs at the rear of a parcel with an existing four-story, three-unit building at the front of the lot.

Figure 4, above, shows these listed cumulative projects.

C. Summary of Environmental Effects

The project could potentially result in adverse physical effects on the environmental resources checked below, and where those impacts are significant or potentially significant, the California Environmental Quality Act (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	☐ Greenhouse Gas Emissions	☐ Geology and Soils
☐ Population and Housing	☐ Wind	☐ Hydrology and Water Quality

[3] In 2020, a preliminary project assessment was completed for a project at 2233 Post Street, which was proposing to replace the existing office building with a seven-story mixed-use building, with 90 residential units and approximately 20,000 square feet of office uses. A project application was not filed for this project as of publication of this document; therefore it is not considered as a cumulative project.

☒ Cultural Resources	☐ Shadow	☐ Hazards and Hazardous Materials
☒ Tribal Cultural Resources	☐ Recreation	☐ Energy
☐ Transportation and Circulation	☐ Utilities and Service Systems	☐ Mandatory Findings of Significance
☐ Noise	☐ Public Services	
☒ Air Quality	☐ Biological Resources	

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 issue. A discussion is included for those issues checked "Less than Significant Impact 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 *Transportation Impact Analysis Guidelines for Environmental Review* or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Wildlife. The items checked above have been determined to be "Less than Significant with Mitigation Incorporated."

NO IMPACT OR NOT APPLICABLE ENVIRONMENTAL TOPICS

The proposed project would have no impact on the following environmental topics and as a result are not discussed further in this initial study: Aesthetics, Agriculture and Forestry Resources, Mineral Resources, and Wildfire. This section briefly describes why these topics would have no impact or are not applicable to the proposed project.

Aesthetics and Parking

In accordance with Public Resources Code Section 21099: Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

a) The project is in a transit priority area;
b) The project is on an infill site; and
c) The project is residential, mixed-use residential, or an employment center.

The proposed project meets each of the above criteria, due to its location within both a transit priority and on an infill site, and due to it being considered an employment center, as the project site is zoned for commercial uses, and the proposed project's floor-area ratio would exceed 0.75.[4] Therefore, this initial study does not consider aesthetics or parking in determining the significance of project impacts under CEQA.

4 San Francisco Planning Department, Eligibility Checklist for Public Resources Code Section 21099: Modernization of Transportation Analysis, 2245-2255 Post Street (hereinafter *"Public Resources Code section 21099 Checklist"*), November 3, 2025.

Automobile Delay and Vehicle Miles Traveled

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

In January 2016, the OPR published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA[5] recommending that transportation impacts for projects be measured using a vehicle miles traveled (VMT) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted the OPR's recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution No. 19579). The VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as riding transit, walking, and bicycling.

Agriculture and Forestry Resources

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

Mineral Resources

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

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 project.

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5 Governor's Office of Planning and Research. Available at http://opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf, accessed August 23, 2020.

D. Evaluation of Environmental Effects

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
1. 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 proposed project would demolish the two existing adjacent buildings on the project site and construct a four-story, approximately 60-foot-tall building (68 feet and 6 inches in height to the top of mechanical equipment) that would be approximately 34,073 gross square feet in size. Although portions of the sidewalks adjacent to the project site may be closed for periods of time during construction, such closures would be temporary. Sidewalks access would be restored following construction. The proposed project would not result in the construction of a physical barrier that could impede neighborhood access or remove an existing means of access. Therefore, the proposed project would have a ***less-than-significant impact*** with respect to physically dividing an established community and no mitigation measures are necessary.

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

Land use impacts could be potentially significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental impact. 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 General Plan and Planning Code. The proposed project would generally conform to the NC-3 (Neighborhood Commercial, Moderate Scale) Zoning District, and is within a 65-A Height and Bulk District. However, the project sponsor would seek approval of Planning Code and zoning map amendments adopting a Special Use District in order to incorporate the following provisions into the proposed project:

- Removing applicable non-residential use size limits;
- Setting the floor area ratio to 5 to 1;
- Waiving applicability of bulk controls;

- Waiving application of Planning Code Section 138.1 regarding streetscape Improvements, in consideration of special site security concerns; and
- Altering street frontage, awnings, and business sign controls.

As part of project approvals, zoning text and map amendments would be undertaken to apply the elements of the Special Use District to the project site. The physical environmental effects of the proposed project related to various resource topics are analyzed in this initial study. For these reasons, the impact of the proposed project with respect to any conflict with land use plans and regulations, specifically the General Plan and Planning Code, would be ***less than significant***, and no mitigation would be required.

Environmental plans and policies are those that directly address environmental issues and/or contain targets or standards that must be met in order to preserve or improve characteristics of the City's physical environment. Examples of such plans, policies, or regulations include the Bay Area Air District's 2017 Clean Air Plan and the San Francisco Regional Water Quality Control Board's San Francisco Basin Plan. As discussed in Section D.7, Air Quality, Section D.8, Greenhouse Gas Emissions, and Section D.14, Biological Resources, the proposed project would not conflict with any plan, policy or regulation adopted for the purpose of avoiding or mitigating an environment effect, including those listed above or other plans such as the San Francisco's Strategies to Address Greenhouse Gas Emissions (GHG Reduction Strategy) and the San Francisco Urban Forestry Ordinance. The impact would be ***less than significant***. No mitigation would be required.

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

Cumulative development in the project vicinity (within 0.25-mile radius of the project site) includes projects that are either under construction or for which the planning department has a project application on file. All of the cumulative development in the project vicinity, listed above in Section B, Project Setting, would include residential uses. These projects would either convert existing spaces or would be infill projects. Due to the relatively small nature and scope of these cumulative projects, they would not combine with the proposed project in a manner that would result in a conflict with a land use plan, policy, or regulation adopted for the purpose of mitigating an environmental effect. In addition, the cumulative projects would not combine with the proposed project to alter the land use pattern of the immediate area or physically divide an established community. Therefore, the proposed project, in combination with cumulative projects, would not result in cumulative land use impacts. Accordingly, cumulative impacts related to land use would be ***less than significant***.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
2. 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 growth in an area, either directly or indirectly, that might not otherwise occur without the project.

According to the U.S. Census Bureau's most recent American Community Survey, the City and County of San Francisco had an estimated population of about 808,988 residents in 2023.[6] The 2020 census data indicate that census tract 155, which includes the project site and immediate vicinity, had a population of 3,899.[7] Employment in San Francisco is forecasted to increase by more than 35 percent (236,000 jobs) between 2015 and 2050, for a total of approximately 918,000 jobs.[8] As of July 2025, San Francisco had a labor force of 514,200 people with 491,700 employed people.[9]

The proposed project would demolish the two existing adjacent buildings on the project site and construct a four-story, approximately 60-foot-tall building (68 feet and 6 inches in height to the top of mechanical equipment) that would be approximately 34,073 gross square feet in size. Implementation of the proposed project would not increase the residential population at the project site because the proposed project would not provide any residential units. Therefore, the proposed project would not induce substantial unplanned residential population growth. The proposed project also would not indirectly induce substantial unplanned

[6] United States Census Bureau. American Community Survey 2023 1-Year Demographic and Housing Estimates. Available: https://data.census.gov/table/ACSDP1Y2023.DP05?q=San+Francisco+County. Accessed: August 27, 2025.

[7] United State Census Bureau. 2020 Census Demographic Data Map Viewer, Census Tract 155 San Francisco Count, California. Available: https://maps.geo.census.gov/ddmv/map.html. Accessed: August 27, 2025.

[8] Association of Bay Area Governments, Metropolitan Transportation Commission, Plan Bay Area 2050, The Final Blueprint, Growth Pattern, Updated January 21, 2021. Available: https://www.planbayarea.org/sites/default/files/FinalBlueprintRelease_December2020_GrowthPattern_Jan2021Update.pdf. Accessed: August 28, 2025.

[9] Employment Development Department of California, San Francisco County Profile, 2025, Available: https://labormarketinfo.edd.ca.gov/cgi/databrowsing/localAreaProfileQSResults.asp?selectedarea=San+Francisco+County&selectedindex=38&menuChoice=localAreaPro&state=true&geogArea=0604000075&countyName=. Accessed: August 28, 2025.

residential population growth in the project area due to infrastructure improvements because the project site is an infill site located in an urbanized area and does not propose any extensions to area roads or other infrastructure that could enable additional development in currently undeveloped areas.

The proposed project would employ up to approximately 40 people. Employment under the proposed project is unlikely to attract new residents to San Francisco because such jobs are typically filled by existing residents in the area. It is anticipated that most of the employees would live in San Francisco or nearby communities and that the proposed project would not generate demand for new housing to accommodate new employees. Even if all of the estimated 40 new employees would relocate to San Francisco, project-related employment growth would represent a negligible proportion of the city's estimated growth between 2010 and 2040. Therefore, the proposed project would not directly or indirectly induce substantial unplanned population growth. This impact would be ***less than significant*** and no mitigation measures are necessary.

Impact PH-2: The proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing outside. -No Impact–

The proposed project would not displace any residents or housing units since no housing units currently exist on the project site. Therefore, the proposed project would have ***no impact*** related to the displacement of housing units or people and would not necessitate the construction of replacement housing. No mitigation measures are necessary.

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 analysis considers development and infrastructure projects located in the vicinity of the project site, identified in Section B, Project Setting. Most of the cumulative projects would result in intensification of land uses in the project vicinity, similar to the proposed project. However, these projects would be infill projects and would be consistent with the planning vision for the area as well as with projected regional and city-wide growth in population, housing, and employment. Therefore, the proposed project in combination with past, present, and reasonably foreseeable future projects, would not result in significant cumulative impact related to population and housing, and the impact would be ***less than significant***. No mitigation measures are necessary.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
3. 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 archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐	☐

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

Pursuant to Section 15064.5 of the *CEQA Guidelines*, historical resources include properties listed or formally determined eligible for listing in, the California Register of Historical Resources (California Register) or in an adopted local historic register. Historical resources also include resources identified as significant in a historical resource survey meeting 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…"[10]

In evaluating whether the proposed project would cause a substantial adverse change in the significance of a historical resource, the Planning Department 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.

The proposed project would demolish two buildings, 2245 Post Street, and the adjacent building at 2255 Post Street. A historic resources evaluation (HRE) was prepared for each building to assist Planning Department staff in determining if either of the existing buildings on the project site could be considered a historic resource. For both buildings, Planning Department staff reviewed the HREs, concurred with the findings, and issued determinations that the buildings are not a historical resource, as summarized below.

[10] *CEQA Guidelines* 15064.5(b)(2)(A).

As discussed in the HRE prepared for the 2245 Post Street building,[11] the structure was designed by architect Nathan Kuper and constructed by Arnold Blum in 1965 for original owner Dr. Gerson R. Biskind, as a two-story medical office building without a basement. Since its construction, the building has not undergone any major alterations. The building does not appear historically or aesthetically significant such would rise to a level of individual eligibility. No historic events (Criterion 1), associated persons (Criterion 2), architecture (Criterion 3), nor rarity of construction (Criterion 4) appear to be associated with the building. Thus, the 2245 Post Street structure does not appear to be eligible for listing in the National Register or California Register. The building also does not appear to be part of a significant concentration of historically or aesthetically unified buildings such would rise to the level of an eligible historic district. Therefore, the subject property is not eligible for listing in the California Register under any criteria individually or as part of a historic district. Planning Department staff reviewed the HRE prepared for 2245 Post Street and concurred with its conclusions that this building is not a historic resource.[12]

As discussed in the HRE prepared for 2255 Post Street,[13] the two-story commercial office building on this site was constructed in 1947 and is a vernacular expression of the International Style designed by Hymn & Appleton & Wolfard. The address was first developed in 1906 with a two-story residential building. In 1947, the residential building was replaced with a psychiatric clinic associated with Mount Zion Hospital, located across the street (the 2255 Post Street building is located in the former Western Addition Redevelopment Area, but was constructed just prior to urban renewal as part of the Mount Zion hospital development). Mount Zion Hospital constructed 2255 Post Street as a psychiatric clinic and the "first unit in the hospital's post-war program to double its capacity." The clinic was led by Dr. Norman Reider, head of Mount Zion Hospital's psychiatric department, and staffed with psychiatrists, psychologists, and social workers. By the mid-1960's, the psychiatric clinic had been replaced with the offices of Homeward Terrace, a private organization that developed small group homes for children without guardians. By 1972, after the second story was added to the building, it appears that the building was still owned by the Mount Zion Hospital and used as medical and administrative offices.[14]

The HRE found the 2255 Post Street structure not eligible for individual listing in the California Register of Historical Resources under Criterion 1 (events), 2 (persons), 3 (architecture), or 4 (information potential). Although the medical and psychiatric uses of 2255 Post Street likely aided those in need, the property's association with these uses were not found to be sufficiently important to be significant under Criterion 1. None of the known occupants, clinicians, or doctors associated with the property appear to rise to level of importance that the subject property would be significant by association. Therefore, the property does not appear significant under Criterion 2. Architecturally, the subject building represents an unexceptional example of the International Style that has undergone alterations since construction. Although the building is associated with the notable firm, Appleton & Wolfard, the subject building is not representative of their body of work, nor does it retain physical integrity. Therefore, 2255 Post Street is not eligible for listing under Criterion 3. Based upon a review of information in the Department's records, the subject building is not significant under Criterion 4 since this significance criterion typically applies to rare construction types when involving the built environment. The subject building also is not an example of a rare construction type. The

[11] Page & Turnbull. 2022. *2245 Post Street Historic Resource Evaluation, San Francisco, California*. Prepared for: Jewish Family and Children's Services.

[12] San Francisco Planning Department, *Historic Resource Review 2245 Post Street*. 2023-003893HRR. October 2023.

[13] Page & Turnbull. 2022. *2245 Post Street Historic Resource Evaluation, San Francisco, California*. Prepared for: Jewish Family and Children's Services.

[14] Ibid

building does not appear to be part of a significant concentration of historically or aesthetically unified buildings such would rise to the level of an eligible historic district. Therefore, the subject property is not eligible for listing in the California Register under any criteria individually or as part of a historic district.[15] Planning Department staff reviewed the 2255 Post Street HRE as well as other available archival documents relevant to this structure and concurred with the HRE's finding that the building was not a historic resource.[16]

The Mount Zion Hospital Complex, across Post Street from the project site, is on the National Register, and is comprised of several buildings of different ages and architectural styles. Some of these buildings have been identified as historic through surveys, but the complex is not part of a historic district. Similarly, the project site is not within a historic district and construction of the proposed project would not affect the historic significance of the above adjacent historic resources or the buildings within the nearby conservation district. Therefore, the proposed project would have a less-than-significant impact on nearby historic resources.

In light of the above, proposed demolition of the two existing buildings (2245 Post Street and 2255 Post Street) at the project site and construction of the proposed project would have a ***less-than-significant*** impact on historic resources, and no mitigation is required.

Impact CR-2: The proposed project could cause a substantial adverse change in the significance of an archaeological resource. -Less than Significant with Mitigation–

This impact discussion treats archeological resources, both as historical resources, according to CEQA Guidelines section 15064.5, as well as unique archeological resources, as defined in section 21083.2(g). Determining the potential for encountering archeological resources is based on factors such as the pre-development environmental setting, history of past development, location, depth, and amount of excavation proposed as well as any recorded information on known resources in the area.

The Planning Department conducted a preliminary archeological review[17] of the project site to determine the potential for the proposed project to impact archeological resources.

The proposed project would be supported by a spread footing foundation (though a mat foundation may be used in lieu of footings in a portion or underlying all of the building) and would require a maximum depth of approximately 18 feet of excavation over an area of 8,700 square feet, for a total excavation of approximately 5,600 cubic yards. The project includes excavation for a lower level and foundations to extend to a depth of about 15 to 22 feet below ground surface. The project site is underlain by dense native sand. Dune sand has sensitivity for Native American resources due to historic proximity to water resources. Historic era resources may be present near the top of the dune sand as well, and would likely be associated with rear yard space and outbuildings. Ground disturbance for the proposed project would extend through layers with high sensitivity.[18]

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[15] Ibid.

[16] San Francisco Planning Department, *Historic Resource Review 2255 Post Street*. 2024-011443HRR. June 2025.

[17] San Francisco Planning Department. *Environmental Planning Cultural Resource Review (CRR) Memo, 2245-2255 Post Street*. July 10, 2025.

[18] Ibid.

Due to the depth of the proposed lower level and foundation, the Planning Department determined that the project may adversely impact archeological resources if such resources are present within the project site. Therefore, the project's ground-disturbing construction activity could result in significant impacts to these potential archeological resources. To reduce impacts on archeological resources, the project sponsor would be required to implement **Mitigation Measure M-CR-1, Archeological Testing**. Implementation of Mitigation Measure M-CR-1, Archeological Testing, would require testing for archeological resources and in the event significant resources are discovered, appropriate data recovery is required to ensure that information value is obtained from the resource. The full text of Mitigation Measure M-CR-1 with implementation responsibility, mitigation schedule, monitoring/reporting responsibility, and monitoring actions/completion criteria is available in the project's Mitigation Monitoring and Reporting Program, **Attachment B**.

Mitigation Measure M-CR-1: Archeological Testing

Archeological Testing Program. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA. 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 testing 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 an archeological monitoring and/or data recovery program if required pursuant to this measure. Archeological monitoring and/or 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 Sect. 15064.5(a) and (c).

Archeological Testing Plan. The archeological testing program shall be conducted in accordance with the approved Archeological Testing Plan (ATP). The archeological consultant and the ERO shall consult on the scope of the ATP, which shall be approved by the ERO prior to any project-related soils disturbing activities commencing. The ATP 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 testing as specified in the approved ATP prior to and/or during construction.

The ATP 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, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The ATP shall also identify the testing method to be used, the depth or horizonal extent of testing, and the locations recommended for testing and shall identify archeological monitoring requirements for construction soil disturbance as warranted.

Archeological Sensitivity Training. The archeological consultant 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.

Cultural Sensitivity Training. The project sponsor shall retain the services of representative from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the project to monitor the archeological testing program undertaken pursuant to this measure. The local Native American representative at their discretion may provide a Native American cultural sensitivity training to all project contractors. The project sponsor should contact the department Cultural Resources Team to obtain the names and contact information for the California Native American tribes affiliated with the geographic area of the project.

Discovery Treatment Determination. At the completion of the archeological testing program, the archeological consultant shall submit a written summary of the findings to the ERO. The findings memo shall describe and identify each resource and provide an initial assessment of the integrity and significance of encountered archeological deposits.

If the ERO in consultation with the archeological consultant determines that a significant archeological 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 (ARPP), 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.

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. The ERO in consultation with the archeological consultant shall also determine if additional treatment is warranted, which may include additional testing and/or construction monitoring.

Paleoenvironmental Analysis of Paleosols. If a buried paleosol is identified, 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.

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 local Native American representative or appropriate representative of the descendant group at their discretion shall provide a cultural sensitivity training to all project 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) 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 archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. 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.

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.

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 section 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 section 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.

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 Ohlone 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.

Archeological Resources Report. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the testing 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 and describes the archeological, 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 Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the 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 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-1, the impact on prehistoric or historic archeological resources from project construction would be ***less than significant with mitigation***.

Impact CR-3: The proposed project could disturb any human remains, including those interred outside of formal cemeteries. -Less than Significant with Mitigation–

There are no known human remains, including those interred outside of formal cemeteries, located in the immediate vicinity of the project site. However, human remains may be present in archeological deposits

and may potentially be found in isolation. If 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-1, Archeological Testing, discussed above, has been identified and agreed to by the project sponsor. Mitigation Measure M-CR-1 includes the required procedures to address, protect, and treat human remains should any be discovered during construction. With implementation of Mitigation Measure M-CR-1, the proposed project's impact on human remains would be ***less than significant with mitigation***.

Impact C-CR-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to cultural resources. -Less than Significant–

As discussed above, the two buildings on the project site are not eligible for listing in the California Register and therefore are not historically significant. Therefore, the proposed project would not result in the loss or change to a historic structure. Moreover, the project site is not within a historic district. Similarly, cumulative projects located nearby are also not located within a historic district. Therefore, the proposed project would not combine with cumulative projects to result in significant impacts to historic architectural resources or adjacent historic districts. This impact would be ***less than significant***, and no mitigation would be required.

Proposed project-related impacts on archeological resources and human remains are site-specific and generally limited to a project's construction area. There are no known archeological resources on the project site or known adjacent resources that may extend onto the project site. The closest cumulative projects are located approximately two blocks northwest and northeast of the project site. These projects are not anticipated to impact similar archeological resources in the project vicinity. For these reasons, the proposed project, in combination with other cumulative projects and other reasonably foreseeable future projects, would not result in a cumulatively considerable impact on archeological resources or human remains. Therefore, cumulative impacts to archeological resources and human remains would be less than significant.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
4. 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.	☐	☒	☐	☐	☐

Impact TCR-1: The proposed project could result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. -Less than Significant with Mitigation–

Public Resources Code section 21074(a).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 also either included or determined to be eligible for inclusion in the California register or included in a local register of historical resources as defined in Public Resources Code section 5020.1(k).

Pursuant to Public Resources Code section 21080.3.1(d), on July 10, 2025, the Planning Department contacted Native American individuals and organizations for the San Francisco area, providing a description of the proposed project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity. During the 30-day comment period, two Native American tribal representatives contacted the Planning Department to request consultation.

Based on tribal consultation undertaken by the City and County of San Francisco in 2025 with Native American tribal representatives, in San Francisco, prehistoric archeological resources are presumed to be potential tribal cultural resources. Impact CR-2, above, states that the proposed project's ground disturbance could result in a significant impact to prehistoric 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. Mitigation Measure M-CR-1, Archeological Testing, has been identified to reduce impacts to tribal cultural resources encountered during construction activities to a less-than-significant level. The project sponsor has agreed to implement Mitigation Measure M-CR-1.

As part of Mitigation Measure M-CR-1 any discovered tribal cultural resources would require either preservation-in-place, if determined effective and feasible, or the project sponsor would be required to coordinate with the affiliated Native American tribal representatives to prepare and implement an interpretive program regarding the tribal cultural resource.

With implementation of Mitigation Measure M-CR-1, impacts to tribal cultural resources would be reduced to ***less than significant with mitigation***.

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

Proposed project-related impacts on tribal cultural resources are site specific and generally limited to a project's construction area. As discussed above in Impact C-CR-1, impacts of the proposed project would be unlikely to combine with impacts of cumulative projects to result in cumulative impacts to prehistoric archeological resources, which are also tribal cultural resources. For these reasons, the proposed project, in combination with other reasonably foreseeable future projects, would not have a significant cumulative impact on tribal cultural resources. Therefore, this impact would be 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
5. 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?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☐	☐	☒

The proposed project would satisfy the eligibility criteria for a "transit-oriented infill project" under CEQA Guidelines Section 21099(d)(1) because it would consist of employment center uses (as it is located on a site that is zoned for commercial uses and would have an FAR exceeding 0.75); would be located on an infill site; and would be located within a transit-priority area. Therefore, the proposed project would be exempt from an analysis of impacts on (automobile) parking under CEQA. Furthermore, the proposed project would meet the map-based screening criterion for Vehicle Miles Traveled (VMT) impacts as discussed below, thereby exempting it from requiring analysis of secondary impacts related to parking, including potentially hazardous conditions for people walking, bicycling, or driving; interference with accessibility for people walking or bicycling; inadequate access for emergency vehicles; and substantial delay for public transit.

The Governor's Office of Planning and Research (OPR) Technical Advisory provides screening criteria to identify types, characteristics, or locations of land use projects that would not exceed these VMT thresholds of significance and recommends that if a project or land use proposed as part of the project meets any of the below screening criteria, then VMT impacts are presumed to be less than significant for that land use and a detailed VMT analysis is not required. These screening criteria and how they are applied in San Francisco are described below:

- **Map-Based Screening for Residential and Retail Projects.** The Technical Advisory recommends mapping areas that illustrate areas where VMT is less than the applicable threshold for that land use. Accordingly, the transportation authority has developed maps depicting existing VMT levels in San Francisco for residential and retail land uses based on the San Francisco Chained Activity Model Process (SF-CHAMP). The Planning Department uses these maps and associated data to determine whether a proposed project is located in an area of the City that is below the VMT threshold.

- **Proximity to Transit Stations.** The Technical Advisory recommends that residential and retail projects, as well as projects that are a mix of these uses, proposed within 0.5 mile of an existing

major transit stop (as defined by CEQA Guidelines § 21064.3) or an existing stop along a high-quality transit corridor (as defined by CEQA Guidelines § 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the proposed project would: (1) have a FAR of less than 0.75; (2) include more parking for use by residents, customers, or employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable sustainable communities strategy.

As documented in the Public Resources Code section 21099 Checklist,[19] the proposed project would meet these criteria. For these reasons, a quantitative transportation analysis is not required for the proposed project.

Impact TR-1: The proposed project would not involve construction that would require a substantially extended duration or intensive activity, and the secondary effects would not 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. -Less than Significant–

The Planning Department's Transportation Impact Analysis Guidelines, adopted in February 2019, set forth screening criteria for types of construction activities that would typically not result in significant construction-related transportation effects based on project site context and construction duration and magnitude. These include criteria such as expected construction timeframe (required to be 30 months or less) and the level of excavation (required to be 2 levels below ground surface or less). The proposed project would take approximately 21 months to be constructed. During the construction period, portions of the sidewalk along the project site and portions of Post Street may be subject to temporary closure. Given the project site context and construction duration and magnitude, the project meets the screening criteria.

Further, the proposed project would be subject to the San Francisco Regulations for Working in San Francisco Streets (the Blue Book). The Blue Book is prepared and regularly updated by the SFMTA, 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. As part of the proposed project's construction process, a portion of the sidewalk may be closed along the project frontage. The proposed project would be required to adhere to Blue Book regulations and, therefore, would have a ***less-than-significant*** construction-related transportation impact.

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 would add approximately 15 private auto trips and four Transportation Network

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[19] San Francisco Planning Department, Eligibility Checklist for Public Resources Code Section 21099: Modernization of Transportation Analysis, 2245-2255 Post Street, November 3, 2025.

Company (TNC)/taxi trips to local roadways during operation during the p.m. peak-hour compared to existing conditions, and a total of approximately 207 daily vehicle trips.[20] The proposed project does not include off-street parking and would not create a new vehicular curb cut along the project frontages; therefore, the project would not create a new hazard to pedestrians on the sidewalks along the project's frontages. Because of the low number of new p.m. peak-hour vehicle trips associated with the proposed project, relatively few turning movements would be expected to occur that would conflict with people walking, bicycling, or driving along Post Street.

The proposed project would not alter the existing street grid, reconfigure the intersections near the project site, or introduce other physical features that would create potentially hazardous conditions for people driving, walking, or bicycling, or for public transit operations. Therefore, the proposed project would not exacerbate existing hazardous conditions in the project vicinity or create a new potentially hazardous condition for people walking, bicycling, or driving, or public transit operations. Therefore, the proposed project would result in a ***less-than-significant*** impact with respect to potentially hazardous conditions for people walking, bicycling, or driving, or for public transit operations, and no mitigation measures would be 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 construct any physical obstructions that would obstruct sightlines between people walking or bicycling and people driving adjacent to the proposed project. The proposed project would generate a total of 200 person trips by private auto, 59 trips by TNC/taxi, 99 transit trips, 91 walk trips, and 15 person trips by bicycle on a daily basis.[21]

Pedestrian Facilities. All streets in the project vicinity have sidewalks on both sides of the street. The proposed project would include streetscape improvements, which would create a bulbout in front of the proposed entrance, and would add bollards. Subject to review and approval by SFMTA, the proposed project would lengthen the existing 40-foot-long loading zone in front of the project site to a 60-foot-long loading zone, including installation of an accessible passenger loading curb ramp. The existing sidewalks in the project vicinity would be able to accommodate the additional pedestrian trips generated by the proposed project without becoming substantially overcrowded or substantially affecting pedestrian flows.

Bicycle Facilities. Post Street adjacent to the project site includes Class II bicycle bikeways in both directions. The proposed project would generate 15 daily bicycle trips, as discussed above. This relatively low number of bicycle trips would not substantially conflict with or result in unsafe conditions to nearby bicycle paths or facilities. Proposed streetscape improvements would include two class II bicycle parking spaces via bicycle racks on the project site frontage. In addition, 14 class I bicycle parking spaces would be

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[20] Transportation Calculations, 2245-2255 Post Street. *City of San Francisco Travel Demand Tool*. Available: https://sftraveldemand.sfcta.org/. Accessed: July 1, 2025. The transportation calculations did not account for the trips that are associated with the current uses at the project site. Considering those uses would reduce the overall trip values. Therefore, the analysis was conservative.

[21] Ibid.

provided on the lower level. The proposed project would provide adequate bicycle parking and access and would not result in hazardous conditions for bicyclists.

Emergency Access. There are no emergency service facilities immediately adjacent to the project site. Across Post Street on the north side is the UCSF Medical Center at Mount Zion, which has its main entrance on Divisadero Street and does not have any entrances along Post Street. The proposed project would not include features that would inhibit emergency vehicle access. Therefore, the proposed project would not interfere with accessibility for emergency services.

Based on the discussion above, the proposed project would result in a ***less-than-significant*** impact with respect to accessibility for people walking or bicycling to and from the project site and adjoining areas or adequacy of emergency access, and no mitigation measures would be required.

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

The proposed project would not alter existing transit stops or other facilities for public transit that would affect transit service and would not add a new driveway onto a street with an active public transit route. The proposed project would generate 15 private auto trips and four TNC/taxi trips to local roadways during operation during the p.m. peak-hour compared to existing conditions. This level of p.m. peak-hour vehicle trips is substantially below the Planning Department's transit delay screening criterion of 300 p.m. peak-hour vehicle trips, which is the amount of traffic that could potentially substantially delay public transit vehicles operating on routes adjacent to a project site.

Therefore, operation of the proposed project would not result in substantial delays in public transit service and would have a ***less-than-significant*** impact on transit. No mitigation measures would be necessary.

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 project site is in an area where the VMT for the proposed project land uses is more than 15 percent below existing regional average daily VMT. Additionally, the proposed project is not a transportation project and does not include transportation features that would induce automobile travel. Based on the discussion above, the proposed project would result in a ***less than significant impact*** with respect to VMT and no mitigation measures would be required.

Impact TR-6: The proposed project would not result in a loading deficit such that impacts would occur. -Less than Significant–

The proposed project would lengthen the existing 40-foot-long passenger loading zone in front of the project site to a 60-foot-long passenger loading zone. A range of events could be held in the proposed building, with varying attendance levels, frequencies, and schedules. While a substantial share of attendees would be

expected to take transit, bike, or walk to and from the site, some portion of attendees would likely travel to and from the site by automobile. The effect of the planned events on the conditions during any one hour (such as the weekday p.m. peak hour) would be marginal and vehicle trips by Taxi/TNC would be accommodated within the proposed on-site loading facilities or within nearby on-street loading zones. The proposed 60-foot-long (accounting for the 20-foot extension) loading zone would also provide sufficient commercial/freight loading demand (one space). Therefore, the proposed project would result in a ***less-than-significant*** impact on passenger loading conditions.

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–

Localized construction-related transportation impacts could occur when cumulative projects generate increased traffic at the same time and on the same streets as the proposed project. The nearest cumulative project is over two blocks away from the proposed project site, and it is unlikely that construction of the cumulative project would require construction staging or equipment nearby the proposed project site.

As discussed in Impact TR-1, the construction for the proposed project would be required to comply with the Blue Book requirements and/or obtain a special traffic permit from the SFMTA. Similarly, each of the cumulative projects would also be required to comply with the Blue Book requirements. SFMTA would ensure that the project construction, in combination with construction activities associated with the cumulative projects, would not create potentially hazardous conditions for people walking, bicycling, or driving, would not substantially interfere with emergency access and accessibility for people walking or bicycling, and would not substantially delay public transit. Therefore, the proposed project, in combination with the cumulative projects, would result in ***less-than-significant*** transportation-related construction impacts under cumulative conditions.

The proposed project would not create potentially hazardous conditions for people walking or bicycling or otherwise interfere with bicycle or pedestrian accessibility to or from the site or adjoining areas. Similarly, none of the cumulative projects would create potentially hazardous conditions for people walking or bicycling or otherwise interfere with bicycle or pedestrian accessibility to or from the site or adjoining areas. The proposed project would not conflict with any planned or proposed improvements to bikeway facilities or affect pedestrian conditions. Therefore, the proposed project, in combination with cumulative projects, would not result in a cumulative transportation impact on bicycle and pedestrian conditions. The proposed project and cumulative projects would not create design features that would result in inadequate emergency access. The proposed project also would not result in a significant cumulative transit delay impact. Cumulative projects in the immediate vicinity would be served by existing loading zones and would not combine with the proposed project to result in unmet loading demand.

Accordingly, cumulative impacts related to this topic would be ***less than significant***, and no mitigation measures are required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
6. 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?	☐	☐	☐	☐	☒

This initial study checklist topic addresses whether a proposed project would result in a significant temporary or permanent increase in ambient noise levels, create excessive groundborne vibration, expose sensitive receptors to excessive noise levels or groundborne vibration, and/or exceed noise standards established by local government or other agencies. Noise impact analysis considers noise and vibration impacts from project construction and operations. Noise is regulated by the City of San Francisco Police Code Article 29 (Noise Ordinance). The analysis of this topic relies on environmental screening criteria developed through the analysis in the programmatic EIR for the San Francisco Housing Element 2022 Update EIR (Housing Element EIR).[22]

The project site is not within the vicinity of a private airstrip or an airport land use plan area or within two miles of a public airport or public use airport. Therefore, topic D.6c is not applicable to the proposed project.

[22] Planning Department Case No. 2019-016230ENV and State Clearinghouse No. 2021060358. Available at https://sfplanning.org/environmental-review-documents?title=Housing+Element&field_environmental_review_categ_target_id=212&items_per_page=10.

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–

Construction Noise

Construction of the proposed project could create substantial noise through the use of off-road construction equipment. However, the proposed project would be required to comply with sections 2907[23] and 2908[24] of the City's noise ordinance. In addition, the Housing Element EIR identified screening criteria to identify project characteristics for future development that would generally not result in significant construction noise impacts. These criteria are relied upon for the analysis of this project. The screening criteria are:

- 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; and
- Night work would occur for no more than three consecutive nights or up to nine nights within a 90-day period.

The proposed project would use standard construction equipment, would not use impact equipment, would construct a building of 60 feet in height (or 68 feet and 6 inches total height, including rooftop mechanical equipment), would not include demolition or other foundation-related work for more than 12 months, and would not include night work. Therefore, it would meet the construction noise screening criteria.

Operational Noise

The proposed project would introduce new operational noise sources through the use of HVAC and increases in vehicle trips. The Housing Element EIR identified screening criteria to identify project characteristics for future development that would generally not result in significant operational noise impacts. The screening criteria are a development project would not:

- result in a doubling of the baseline number of vehicular trips per day;
- have an occupied floor greater than 75 feet;
- include more than two backup generators.

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[23] Section 2907 of the noise 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 are not subject to the equipment noise limit provided that impact tools and equipment shall have intake and exhaust mufflers recommended by the manufacturers and are approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation. Pavement breakers and jackhammers shall also be equipped with acoustically attenuating shields or shrouds recommended by the manufacturers and approved by the Director of Public Works or the Director of Building Inspection as best accomplishing maximum noise attenuation.

[24] Section 2908 of the noise ordinance prohibits construction work between 8 p.m. and 7 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the director of public works or the director of building inspection.

The proposed project would include 207 daily vehicle trips, which would not represent a doubling of the baseline vehicle trips in the area. Moreover, the height of the proposed building (at 60 feet tall or 68 feet and 6 inches total to the top of rooftop mechanical equipment), would be below 75 feet tall; thus, the proposed project would not include (nor would require to include) any backup generators. Therefore, it would meet the operational noise screening criteria.

Based on the above, overall, construction and operational noise impacts due to the proposed project would be ***less than significant***.

Impact NO-2: The proposed project would not generate excessive groundborne vibration or groundborne noise levels. -Less than Significant–

Construction of the prosed project would not require pile driving, but would require heavy equipment that may generate vibration. The Housing Element EIR identified screening criteria to identify project characteristics for future development that would generally not result in significant construction vibration impacts. These criteria are relied upon for the analysis of this project.[25] The screening criteria are:

- Construction work involving impact equipment or vibration-generating construction equipment (e.g., pile driver, hoe ram, or jack hammer) that would affect one or more sensitive receptors for a period of 14 days or more within a 90-day period, construction equipment that would not comply with section 2907 of the noise ordinance, or when such construction work would occur adjacent to vibration sensitive structures or facilities with vibration sensitive equipment (i.e., hospitals, medical research facilities, and medical office facilities);

The proposed project would not use impact equipment or vibration-generating equipment. Therefore, it would meet the construction vibration screening criteria. The project site is located next to a medical office facility, which may contain vibration-sensitive equipment. However, as the proposed project would not require impact equipment for construction or use vibration-generating equipment, it would result in less-than-significant impacts to the adjacent facilities.

Operational vibration is generally caused by new rail or transit projects, including projects involving above ground rail or transit lines and underground tunnels. The proposed project would not involve these uses; therefore, operational vibration is not discussed further.

Overall, the proposed project's construction and operational vibration-related impacts would be ***less than significant***.

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[25] The Housing Element analysis considered the construction impacts associated with creating building envelopes associate with the different building typologies. They are applicable in this case because the construction impacts are related to the size of the building and construction characteristics, rather than the intended use of the building (e.g. institutional versus housing uses).

Impact C-NO-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on noise. -Less than Significant–

Construction activities within 900 feet of the project site, such as excavation, grading, or construction of other buildings in the area, would occur on a temporary and intermittent basis. Construction noise associated with the proposed project would not substantially increase ambient noise levels at locations greater than a few hundred feet from the project site, and would not combine with the noise created during construction of the proposed project to result in a cumulative construction noise impact. Therefore, cumulative construction-related noise impacts from the proposed project would be less than significant.

The cumulative context for construction vibration impacts is the proposed project and the immediate area surrounding the project site. None of the development projects identified as cumulative projects would be located within 100 feet of the project site. Therefore, the proposed project would not combine with cumulative projects to create a significant vibration impact.

Proposed project-related stationary-source noise, such as from HVAC equipment or exhaust fans, would not substantially increase ambient noise levels at locations that are more than a few hundred feet from the project site. The proposed project and nearby cumulative project would comply with Section 2909 of the Noise Ordinance. Therefore, cumulative operational-related noise impacts from the proposed project would be less than significant.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
7. 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?	☐	☐	☒	☐	☐

SETTING

OVERVIEW

The Bay Area Air District (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 (federal Clean Air Act) and the California Clean Air Act (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 Clean Air Act and the Clean Air Act 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[26] (2017 Clean Air Plan), was adopted by the Air District on April 19, 2017. The 2017 Clean Air Plan updates the most recent Bay Area ozone plan, the 2010 Clean Air Plan, in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse (GHG) emissions 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.

Consistency with the 2017 Clean Air Plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans (Impact E.7.a).

Criteria Air Pollutants

In accordance with the state and federal Clean Air Acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO2), sulfur dioxide (SO2), and lead. 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. The air basin is designated as either in attainment or unclassified for most criteria pollutants with the exception of ozone, $PM_{2.5}$, and PM_{10},[27] for which these pollutants are designated as non-attainment for either the state or federal standards.[28] Ozone is a secondary air pollutant produced in the atmosphere through a

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[26] Bay Area Air District. 2017. *Final 2017 Clean Air Plan*. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf. Accessed: October 1, 2025.

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

[28] "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.

complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NOx).

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.

Land use projects typically result in ozone precursor 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 4, Criteria Air Pollutant Significance Thresholds**, below.

Table 4 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)
Reactive Organic Gases	54	54	10
Nitrogen Oxides	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

Source: Bay Area Air District. 2022, California Environmental Quality Act Guidelines. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: October 6, 2025.

Ozone Precursors

The significance thresholds for reactive organic gases and nitrogen oxides 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 reactive organic gases and nitrogen oxides emissions limit in **Table 4** 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[29] and supporting materials[30] 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

[29] Bay Area Air District. 2022, California Environmental Quality Act Guidelines. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: October 6, 2025.

[30] Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/revised-draft-ceqa-thresholds-justification-report-oct-2009.pdf?la=en. Accessed: October 6, 2025.

basin.[31] 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.[32] The Air District has identified a number of best management practices to control fugitive dust emissions from construction activities.[33] 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 Construction Dust Control Ordinance are an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants, which 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 toxic air contaminants include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of toxic air contaminants with varying degrees of toxicity; at a given level of exposure, one toxic air contaminant may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, toxic air contaminants 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.[34] 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.[35] In addition to $PM_{2.5}$, diesel particulate matter 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.[36] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other toxic air contaminant routinely measured in the region.

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[31] Bay Area Air District. 2022, California Environmental Quality Act Guidelines. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: October 6, 2025.

[32] Western Regional Air Partnership. *2006. WRAP Fugitive Dust Handbook.* September 7, 2006. Available: https://www.env.nm.gov/wp-content/uploads/sites/2/2017/02/WRAP_FDHandbook_Rev_06.pdf. Accessed: October 6, 2025.

[33] Bay Area Air District. 2022, California Environmental Quality Act Guidelines. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: October 6, 2025.

[34] 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 toxic air contaminants.

[35] 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.

[36] California Air Resources Board, Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

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.[37] 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 toxic air contaminants, 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 $PM_{2.5}$, proximity to freeways, and locations with particularly vulnerable populations, as further described below.

Excess Cancer Risk. The air pollutant exposure zone includes areas where modeled cancer risk exceeds 100 incidents per million persons exposed. This criterion is based on U.S. Environmental Protection Agency (U.S. EPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.[38] The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on air district regional modeling.[39]

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*. In this document, the U.S. EPA concludes that the then current federal annual $PM_{2.5}$ standard of 15 $\mu g/m^3$ should be revised to a level within the range of 13 to 11 $\mu g/m^3$, with evidence strongly supporting a standard within the range of 12 to 11 $\mu g/m^3$. In December 2012, the U.S. EPA strengthened the annual $PM_{2.5}$ standard from 15 to 12 $\mu g/m^3$ and issued final area designations based on that standard.[40] In February 2024, the USEPA announced its decision to lower the standard further to 9 $\mu g/m^3$ to provide increased public health protection, consistent with the available health science.[41, 42] The air pollutant exposure zone for San Francisco is based on a health protective standard of 9.0 $\mu g/m^3$

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[37] California Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spot Program Risk Assessment Guidelines*, February 2015. Pg. 4-44, 8-6.

[38] Bay Area Air Quality Management District, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 67.

[39] Bay Area Air District. 2022, California Environmental Quality Act Guidelines. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: October 6, 2025.

[40] United States Environmental Protection Agency, "Reconsideration of the National Ambient Air Quality Standard for Particulate Matter." Vol. 89, Fed. Reg. 16202 (March 6, 2024) (to be codified at 40 CFR 50, 53, and 58). Available at: https://www.govinfo.gov/content/pkg/FR-2024-03-06/pdf/2024-02637.pdf, accessed January 31, 2025.

[41] Ibid.

[42] United States Environmental Protection Agency, Particulate Matter (PM) Standards - Integrated Science Assessments from Current Review. Available at: https://www.epa.gov/naaqs/particulate-matter-pm-standards-integrated-science-assessments-current-review, accessed April 30, 2024.

citywide, consistent with and supported by the evidence and conclusions upon which the U.S. EPA based their reconsideration of the annual average $PM_{2.5}$ standard.[43]

Proximity to Freeways. According to the California 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. Because evidence shows that sensitive uses in an area within a 500 foot buffer of a freeway or within 1,000-foot buffer of any freeway or roadway with an excess of 100,000 vehicles per day are at an increased health risk from air pollution, parcels that are within 500 feet of a freeway or within 1,000 feet of freeways or roadways with an excess of 100,000 vehicles per day are included in the *air pollutant exposure zone*.[44]

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 $\mu g/m^3$.[45]

The above citywide health risk modeling is referenced in the Enhanced Ventilation Required for Urban Infill Sensitive Use Developments (health code), article 38 (ordinance no. 224-14, effective December 8, 2014). 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 air pollutant exposure zone is also referenced in the San Francisco Environment Code section 25, known as the Clean Construction Ordinance (ordinance no. 28-15, effective April 19, 2015). The purpose of the Clean Construction Ordinance is to protect the public health, safety, and welfare by requiring contractors on city public works projects to reduce diesel and other fine particulate matter emissions generated by construction activities. The project site is located within the air pollutant exposure zone and health code article 38 does not apply to the proposed project. 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.

IMPACT ANALYSIS

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

In determining consistency with the 2017 Clean Air Plan, 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.

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[43] Ibid.

[44] San Francisco Planning Department. *Air Quality and Greenhouse Gas Analysis Guidelines*, February 2025. Available: https://sfplanning.org/air-quality. Accessed: October 6, 2025.

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

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 TACs; and (3) protect the climate by reducing greenhouse gas emissions. To meet the primary goals of the Clean Air Plan, the plan recommends 85 specific control measures and actions. To the extent that the Air District has regulatory authority over an emissions source generated by the proposed 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.

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 control measures most applicable to the proposed project are transportation control measures and energy and climate control measures. The proposed project's impacts 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 Greenhouse Gas Reduction Strategy.

The proposed project would not implement any changes to the roadway network that have the potential to interfere with accessibility of people walking or bicycling to and from the project site and adjoining areas. As a result, the proposed project would not discourage people from walking and bicycling near the project site. The proposed project's 207 daily vehicle trips would result in a negligible increase in air pollutant emissions. 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, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the proposed project includes relevant transportation control measures specified in the Clean Air Plan. Therefore, the proposed project would include applicable control measures identified in the Clean Air Plan to meet the General Plan primary goals.

Examples of projects that could cause the disruption or delay of the Clean Air Plan control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The proposed project does not include off-street parking and would not preclude the extension of a transit line or a bike path or any other transit improvement. Therefore, the project would not disrupt or hinder implementation of the Clean Air Plan's control measures.

For the reasons described above, the proposed project would not conflict with or obstruct implementation of the Clean Air Plan and this impact would be less than significant.

Impact AQ-2: The proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the proposed project region is non-attainment under an applicable federal, state, or regional ambient air quality standard. -Less than Significant–

Construction activities (short-term) typically result in emissions of ozone precursors and particulate matter in the form of dust (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 and other construction equipment. However, ROGs are also emitted from activities that involve

painting, other types of architectural coatings, or asphalt paving. The proposed project's construction activities involve demolition of the two existing buildings, site preparation, grading, construction of the four-story building, and architectural coatings. During the proposed project's approximately 21-month construction period, construction activities would have the potential to result in emissions of ozone precursors and particulate matter, as discussed below.

Fugitive Dust

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

In response, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the San Francisco department of building inspection (building department).

The construction dust control ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from the building department.[46]

In compliance with the dust control ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to control construction dust on the site through a combination of watering disturbed areas, covering stockpiled materials, street and sidewalk sweeping, and other measures. Compliance with the regulations and procedures set forth by the dust control ordinance would ensure that potential dust-related air quality impacts would be reduced to a ***less-than-significant*** level.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment and other construction activities. 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, the Air District developed screening criteria.[47] If a proposed project meets the screening criteria, then construction 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

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

[47] Bay Area Air District. 2022, California Environmental Quality Act Guidelines. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: October 6, 2025.

would exceed significance thresholds. The CEQA Air Quality Guidelines note that the screening levels are generally representative of new development on greenfield[48] 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 demolish the two existing buildings construct a four-story, 34,073-gross-square-foot, cultural/institutional/educational building. The Air District screening criteria for a library, which is the most similar land use category, is 450,000 square feet for construction. The proposed project is therefore well below the construction screening levels for criteria air pollutants. The proposed project would also generate operational criteria pollutant emissions associated with vehicle traffic (mobile sources) and on-site area sources (e.g., consumer product use). The building would be all-electric, and there would be no emissions from space and water heating. The Air District operational screening criteria for a library is 123,000 square feet. Therefore, because the proposed project is below the construction and operational screening levels for criteria air pollutants, the proposed project would not result in a significant impact with regards to a cumulatively considerable net increase in non-attainment criteria air pollutants. Criteria air pollutant impacts would be ***less than significant***.

Impact AQ-3: The proposed project could expose sensitive receptors to substantial pollutant concentrations. -Less than Significant with Mitigation–

The project site is located within an *air pollutant exposure zone* (as described above); therefore, the existing health risks from air pollution for sensitive receptors in the vicinity of the project site are substantial. The proposed project would generate toxic air contaminants during construction from the use of diesel-powered construction equipment and during operations resulting from increased vehicle trips. The construction and operational health risks from the proposed project emissions are further analyzed below.

Construction Emissions

According to the Air Board, off-road equipment, which includes construction equipment, was the third largest source of mobile particulate matter emissions in California in 2012, the latest year for which inventory data is available.[49] However, a number of federal and state regulations require cleaner off-road equipment. Specifically, both the USEPA and the air board have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines were phased in between 2008 and 2015. USEPA estimated that by implementing the federal Tier 4 standards, NO_x and particulate matter emissions could be reduced by more than 90 percent as the fleets become equipped with those meeting the emission standards over time.[50]

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. Project-level analyses of construction activities tend to overestimate

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[48] Ibid.

[49] California Air Resources Board, 2017, 2012 Base Year Emissions, Off-Road Sources, Available: https://ww3.arb.ca.gov/ei/emissiondata.htm. Accessed: March 3, 2022.

[50] United States Environmental Protection Agency, Clean Air Nonroad Diesel Rule: Fact Sheet, May 2004.

assessments of long-term health risks. However, within the *air pollutant exposure zone*, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution.

Sensitive land uses near the project site include the assisted living facility located northeast of the site at the corner of Post and Scott streets, residences northwest of the site at the corner of Sutter and Divisadero streets, medical buildings both east and west of the project site on Post Street, and the UCSF Medical Center at Mount Zion, across Post Street from the project site.

The proposed project would require construction activities over an approximate 21-month construction period. Project construction activities would result in short-term emissions of diesel particulate matter and other toxic air contaminants. The project site is located in an area that already experiences poor air quality (given its location in the APEZ) and project construction activities would generate additional air pollution, affecting nearby sensitive receptors and resulting in a significant impact. Implementation of **Mitigation Measure M-AQ-1, Clean Off-Road Construction Equipment**, would reduce require that construction equipment exceeding 25 horsepower that would operate for more than 20 total hours to meet the Tier 4 emission standards. It would also limit engines idling and require the preparation of a construction emissions minimization plan that would be made available for public review onsite during working hours. The full text of Mitigation Measure M-AQ-1, implementation responsibility, mitigation schedule, monitoring/reporting responsibility, and monitoring actions/completion criteria is available in the project's Mitigation Monitoring and Reporting Program, **Attachment B**.

Mitigation Measure M-AQ-1: Clean Off-Road Construction Equipment

The project sponsor shall comply with the following:

A. Engine Requirements:

1. All off-road equipment greater than 25 horsepower and operating for more than 20 total hours over the entire duration of construction activities shall have engines that meet or exceed either U.S. EPA or air resources board Tier 4 Final off-road emission standards.
2. Where access to alternative sources of power are available, portable diesel engines shall be prohibited.
3. 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, safe operating conditions). The project sponsor shall post legible and visible signs in English, Spanish, and Chinese in designated queuing areas and at the construction site to remind operators of the two-minute idling limit. If the majority of the project sponsor's construction staff speak a language other than these, then the signs shall be posted in that language as well.
4. The project sponsor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturers' specifications.
5. Any other best available technology in the future may be included, provided that the project sponsor submits documentation to the department demonstrating that (1) the technology would result in emissions reductions and (2) it would not increase other pollutant emissions

or result in other additional impacts, such as noise. This may include new alternative fuels or engine technology for off-road or other construction equipment (such as electric or hydrogen fuel cell equipment) that is not available as of 2025.

B. Waivers:

The environmental review officer (ERO) may waive the requirement of subsection (A)(2) regarding an alternative source of power if an alternative source is limited or infeasible at the project site. If the ERO grants the waiver, the project sponsor must submit documentation that the equipment used for onsite power generation meets the engine requirements of subsection (A)(1).

The ERO may waive the equipment requirements of subsection (A)(1) if a particular piece of Tier 4 Final off-road equipment is technically not feasible, the equipment would not produce the desired emissions reduction because of expected operating modes, or a compelling emergency requires the use off-road equipment that is not Tier 4 compliant. In seeking an exception, the project sponsor shall demonstrate that the project shall use the cleanest piece of construction equipment available and feasible and submit documentation that average daily construction emissions of ROG, NOx, PM2.5 would not exceed 54 pounds per day, and PM10 emissions would not exceed 82 pounds per day.

C. Construction Emissions Minimization Plan:

Before starting onsite construction activities, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the ERO for review and approval. The Plan shall state, in reasonable detail, how the project sponsor will meet the engine requirements of Section A.

- 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.
- The project sponsor shall ensure that all applicable requirements of the Plan have been incorporated into the project sponsor's contract specifications. The Plan shall include a certification statement that the project sponsor agrees to comply fully with the Plan.
- The project sponsor shall make the Plan available to the public for review onsite 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.

D. Monitoring:

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

While emission reductions from limiting idling is difficult to quantify, the requirement for equipment with Tier 4 compliant emissions can reduce construction emissions by 93 to 96 percent compared to equipment with engines meeting Tier 1 or Tier 2 emission standards.[51] Therefore, compliance with Mitigation Measure M-AQ-3a would reduce construction period TAC emissions on nearby sensitive receptors to a less-than-significant level with mitigation.

Operational Emissions

The proposed project would generate new vehicle trips. The Air District considers roads with fewer than 10,000 vehicles per day "minor, low-impact sources," stating that these sources "do not pose a significant health impact even in combination with other nearby sources." These determinations were made through extensive modeling, source tests, and evaluation of their toxic air contaminant emissions.[52] Similarly, a project that generates fewer than 10,000 vehicles per day would be considered a minor, low-impact source of toxic air contaminants. The proposed project's approximately 207 daily vehicle trips would be well below this level; therefore, an assessment of project-generated toxic air contaminants resulting from vehicle trips is not required and the proposed project would not generate a substantial amount of toxic air contaminant emissions that could affect nearby sensitive receptors.

In summary, the proposed project's toxic air contaminant emissions would be ***less than significant*** with implementation of mitigation measure M-AQ-1: Clean Off-Road Construction Equipment.

Impact AQ-4: 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 after project completion. The proposed project would not include typical odor sources of concern and would not create a significant source of new odors. Therefore, the proposed project would not result in other emissions, such as odors, that could adversely affect a substantial number of people and this impact would be ***less than significant***.

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[51] PM emissions benefits are estimated by comparing off-road PM emission standards for Tier 1 and Tier 2 with Tier 4 final emissions standards. Tier 1 PM emissions standards were established for equipment with 25- <50 horsepower and equipment with horsepower <175. Tier 1 emissions standards for these engines were compared against Tier 4 final emissions standards, resulting in a 96 percent reduction in PM. The EPA established PM standards for engines with horsepower between 50-<175 as part of the Tier 2 emission standards. For these engines Tier 2 emissions standards were compared against Tier 4 final emissions standards, resulting in between 93-95 percent reduction in PM.

[52] Bay Area Air Quality Management District, Recommended Methods for Screening and Modeling Local Risks and Hazards, p. 12. May 2011. Available: https://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/BAAQMD%20Modeling%20Approach.ashx. Accessed: March 3, 2022.

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

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from cumulative projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.[53] 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, cumulative criteria air pollutant analysis is presented in Impact AQ-2. Impact AQ-2 concluded that cumulative criteria air pollutant impacts would be less than significant. The remainder of this cumulative air quality analysis address cumulative health risks and odors to sensitive receptors.

As discussed above, the project site is in the air pollutant exposure zone and nearby sensitive receptors already experience poor air quality. This means significant air quality health risk impacts exist even without the proposed project. The proposed project and cumulative projects in the vicinity would result in additional emissions of toxic air contaminants, including diesel particulate matter emissions from new vehicle trips and other stationary emissions sources similar to the proposed project diesel generator emissions, as well as diesel emissions from construction activities.

As described in Impact AQ-3, above, the proposed project's 207 average daily vehicle trips would be considered minor low-impact sources that do not pose a significant health impact even in combination with other nearby sources. However, the project would involve construction activities that require off-road equipment. Therefore, the proposed project would result in a considerable contribution to significant cumulative health risks. This would be a significant cumulative impact. Implementation of Mitigation Measure M-AQ-1, Clean Off-Road Construction Equipment, would reduce the project's diesel particulate emissions by as much as 96 percent and would reduce the project's contribution to cumulative health risk impacts to a ***less-than-significant with mitigation*** level.

The proposed project and cumulative projects would generate some odors during construction, but odors would be temporary. Upon completion of construction activities cumulative projects combined with the proposed project would not generate substantial odors. Therefore, cumulative odor impacts would be considered ***less than significant***.

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[53] Bay Area Air District. 2022, California Environmental Quality Act Guidelines. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: October 6, 2025.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
8. 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.[54] 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. The updated thresholds also include an alternative performance-based threshold; if a project meets all of the following criteria, the project would result in a less than significant GHG impact:[55]

- Project does not include natural gas and would not result in wasteful, inefficient, or unnecessary energy use;
- Project would result in VMT per capita that is 15 percent below the regional average and meet the CalGreen Tier 2 off-street electric vehicle requirement.

[54] Bay Area Air District, CEQA Thresholds and Guidelines Update. Available: https://www.baaqmd.gov/plans-andclimate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: September 18, 2025.

[55] A project need only demonstrate compliance with one of the thresholds (consistency with a GHG reduction strategy or performance criteria) to find that the project's GHG emissions are less than significant.

San Francisco's 2023 GHG Reduction Strategy Update[56] 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 2022 compared to 1990 levels,[57] which far exceeds the goal of 2020 GHG emissions equaling those in 1990 set in Executive Order S-3-05[58] and the California Global Warming Solutions Act.[59] 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[60] and the air district's 2017 Clean Air Plan[61] more than 10 years before the target date.

San Francisco's GHG reduction goals, updated in July 2021 by ordinance 117-02,[62] are consistent with, or more aggressive than, the long-term goals established under executive orders S-3-05,[63] B-30-15,[64] B-55-18,[65] the California Global Warming Solutions Act of 2016.[66] 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

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[56] San Francisco Planning Department, *2023 Greenhouse Gas Reduction Strategy Update,* October 2023. Available: https://sfplanning.org/project/greenhouse-gas-reduction-strategies. Accessed: September 25, 2025.

[57] San Francisco Department of the Environment, *San Francisco's 2022 Carbon Footprint*. Available: https://sfenvironment.org/carbonfootprint. Accessed: September 25, 2025

[58] Office of the Governor, Executive Order S-3-05, June 1, 2005. Available: https://www.library.ca.gov/wpcontent/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf. Accessed: September 25, 2025.

[59] California Legislative Information, Assembly Bill 32, September 27, 2006. Available: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_00010050/ab_32_bill_20060927_chaptered.pdf. Accessed: September 25, 2025.

[60] California Legislative Information, Senate Bill 32, September 8, 2016. Available: https://leginfo.legislature.ca.gov/faces/billPdf.xhtml?bill_id=201520160SB32&version=20150SB3288CHP. Accessed: September 25, 2025.

[61] Bay Area Air District. 2017. Clean Air Plan. September 2017. Available: http://www.baaqmd.gov/plans-and-climate/airquality-plans/current-plans. Accessed: September 25, 2025.

[62] San Francisco Board of Supervisors. *Ordinance No. 117-21, File No. 210563.* July 20, 2021. Available: https://sfbos.org/sites/default/files/o011721.pdf. Accessed: September 25, 2025. San Francisco's GHG reduction goals are codified in section 902(a) of the Environment Code and include the following goals: (1) by 2030, a reduction in sector-based GHG emissions of at least 61 percent below 1990 levels; (2) by 2030, a reduction in consumption-based GHG emissions equivalent to a 40 percent reduction compared to 1990 levels; (3) by 2040, achievement of net zero sector-based GHG emissions by reducing such emissions by at least 90 percent compared to 1990 levels and sequestering any residual emissions; and (4) by 2050, a reduction in consumption-based GHG emissions equivalent to an 80 percent reduction compared to 1990 levels.

[63] 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.

[64] Office of the Governor, *Executive Order B-30-15*, April 29, 2015. Available: https://www.ca.gov/archive/gov39/2015/04/29/news18938/. Accessed: September 25, 2025. Executive Order B-30-15 sets a state GHG emissions reduction goal of 40 percent below 1990 levels by 2030. San Francisco's 2030 sector based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

[65] Office of the Governor, *Executive Order B-55-18*, September 18, 2018. Available: https://www.ca.gov/archive/gov39/wpcontent/uploads/2018/09/9.10.18-Executive-Order.pdf. Accessed: September 25, 2025. Executive Order B-55-18 establishes a statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net negative emissions thereafter. San Francisco's goal of net zero sector-based emissions by 2040 is a similar goal but requires achievement of the target five years earlier.

[66] 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.

GHG emissions by 2040 and sequester any residual emissions using nature-based solutions.[67] Thus, the city's GHG reduction goal is consistent with the state's long-term goal of reaching carbon neutrality by 2045. The updated GHG ordinance required that the San Francisco Department of the Environment to prepare and submit to the mayor a climate action plan (CAP) by December 31, 2021. The CAP, which was released on December 8, 2021, and will be updated every five years, carries forward the efforts of the city's previous CAPs and charts a path toward meeting the GHG commitments of the Paris Agreement (e.g., limit global warming to 1.5 degrees Celsius) as well as the reduction targets adopted in the GHG ordinance. In April 2025, the San Francisco Department of the Environment released a draft list of actions for updating the plan for 2025 to 2030.[68]

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

The proposed project would demolish the two existing adjacent buildings on the project site and construct a four-story, approximately 60-foot-tall building (68 feet and 6 inches in height to the top of mechanical equipment) that would be approximately 34,073 gross square feet in size. As such, the proposed project would increase the intensity of use of the site and contribute to the cumulative effects of climate change by directly emitting GHGs during construction and operation. Direct operational effects from the proposed project include the GHG emissions from new vehicle trips. Indirect effects include the GHG emissions from electricity providers, including the generation of the energy required to pump, treat, and convey water; other GHG emissions are associated with waste removal, waste disposal, and landfill operations.

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 meet the requirements of the Commuter Benefit Ordinance, Transportation Demand Management Programs, California Energy Code, Commercial Water Conservation Ordinance, and the Mandatory Recycling and Composting Ordinance. The proposed project would also be required to meet the requirements of the San Francisco green building code. The proposed project would be an all-electric building with no natural gas uses and would include solar ready zone[70] on the roof. In addition, the proposed project would comply with other applicable regulations that would reduce the project's GHG emissions related to energy use, waste disposal, and use of refrigerants. 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 2022 also met statewide and regional 2030 targets more than 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

[67] 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.

[68] San Francisco Department of the Environment, *San Francisco's Climate Action Plan: 2025 Update.* Available: https://www.sfenvironment.org/CAP-2025. Accessed: November 3, 2025.

[69] San Francisco Planning Department, *Greenhouse Gas Analysis: Compliance Checklist for 2245-2255 Post Street Project,* September 9, 2025.

[70] As of document publication, the solar ready zone is anticipated to be approximately 1,100 square feet.

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

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
9. 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–

A project's wind impacts are related directly to its height, orientation, design, location, and surrounding development context. Based on wind analyses for other infill development projects in San Francisco, a building that does not exceed a height of 85 feet generally has little potential to cause substantial changes in ground-level wind conditions. The proposed project would demolish two existing two-story buildings and construct a new approximately 60-foot-tall building (68 feet and 6 inches total, including rooftop mechanical equipment) that would be similar in height to existing buildings in the vicinity. The adjacent building west of the site at 2299 Post Street includes a one-story portion along Post Street, with the building mass abutting Divisadero Street approximately 40 feet in height. The building east of the site at 2233 Post Street is approximately 35 feet in height, while the building west of the site across Divisadero Street at 1545 Divisadero Street is approximately 50 feet in height. Due to the City's prevailing westerly winds, it is likely that the 1545 Divisadero would have a sheltering effect much of the time, intercepting winds toward the project site and thereby reducing them. Due to this sheltering effect, the proposed project would have little potential to intercept overhead winds and redirect them downward to the Post Street sidewalk. Given its height and surrounding development context, the proposed project would not cause substantial changes to ground-level wind conditions adjacent to the project site. Therefore, the proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use. The impact would be ***less than significant***, and no mitigation would be required.

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

The cumulative context for wind impacts would be local and limited to the immediate project vicinity. Cumulative projects within a quarter-mile of the project site would mostly be within the existing building envelopes and would have no potential to affect wind conditions. The cumulative projects at 2045 Sutter Street and 2083 Ellis Street would involve either expansions of the existing building envelopes, or demolition and new construction. Cumulative wind impacts could occur if the proposed project, in combination with

cumulative projects, would result in above-ground facilities that would create wind hazards in publicly accessible areas of substantial pedestrian use.

The projects at 2045 Sutter Street and 2083 Ellis Street would both not be tall enough or close enough to the project site to combine with the proposed project in a way that could create wind hazards in publicly accessible areas of substantial pedestrian use. The 2045 Sutter Street project would add an additional story to a four-story building. The 2083 Ellis Street project would construction a seven-story building, which is over 1,000 feet from the project site, and also located westward of the project site, further into the prevailing wind direction. For these reasons, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative wind impact. The impact would be cumulatively ***less than significant***. No mitigation would be required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
10. SHADOW. Would the project:					
a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	☐	☐	☒	☐	☐

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–

In 1984, San Francisco voters approved an initiative known as "Proposition K, The Sunlight Ordinance," which was codified as Planning Code section 295 in 1985. Planning Code section 295 generally prohibits new structures above 40 feet in height that would cast additional shadows between one hour after sunrise and one hour before sunset, at any time of the year, on open space that is under the jurisdiction of the San Francisco Recreation and Park Commission unless those shadows would not result in a significant adverse effect on the use of the open space. Public open spaces that are not under the jurisdiction of the recreation and park commission as well as private open spaces are not subject to Planning Code section 295.

The nearest public open space to the project site is the Hamilton Recreation Center, which includes an outdoor field, play areas, and a recreation center, including a pool. To assess the impacts of the proposed project, a qualified shadow consultant prepared a *shadow analysis* for the proposed project.[71] The purpose of the analysis is to provide shadow diagrams showing the net new shadows cast by the proposed project. In the context of this report "net new shadows" refers to the areas of shadowing caused by the proposed building or cumulative buildings that are not already shadowed under the existing condition. A 3D model of the proposed development and the surroundings was created. The model was used to produce a set of computer-generated shadow diagrams for the proposed development, highlighting net new shadows cast by

[71] Fastcast, *Memorandum of Potential Shadow Effect: 2245-2255 Post Street San Francisco*, July 8, 2025.

the proposed project on an hourly basis throughout the year. The analysis found that there would be no net new shadows from the proposed project cast on the Hamilton Recreation Center. Therefore, the proposed project would add no additional shadow on the center.

The proposed project would cast new shadows on sidewalks in the vicinity of the project site, but new shadow coverage would be generally transitory in nature and would not substantially affect the function of sidewalks (which, in the vicinity of the site, are used primarily as pedestrian walkways and not as places for extended periods of stationary activity). These new shadows would not be above levels that are common for San Francisco's urban environment.

Therefore, this impact would be ***less than significant***, and no mitigation would be required.

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

The only cumulative development that may affect shadow conditions is the 2045 Sutter Street project, which may cast shadows on the Hamilton Recreation Center. However, new shadow on this space from the cumulative project and the proposed project would not occur at the same time, as the proposed project would not result in any net-new shadow on the center. For this reason, the proposed project would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative shadow impact. Therefore, this impact would be ***less than significant***.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
11. 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?	☐	☐	☒	☐	☐

Impact RE-1: The proposed project would increase the use of existing neighborhood and regional parks and other recreational facilities, but not to such an extent that substantial physical deterioration of the facilities would occur or be accelerated. -Less than Significant–

The neighborhood parks or other recreational facilities closest to the project site are the Western Addition Branch Library (0.05 miles to the east), Hamilton Recreation Center (0.1 miles to the east), Raymond Kimbell

Playground Park (0.15 southeast), and the California Tennis Club, a private tennis club containing 10 tennis courts (0.1 miles to the northeast).

The proposed project does not propose any residential units; therefore, project implementation would not result in a permanent increase in demand for parks and recreational facilities in the vicinity. The proposed project is a cultural and educational center, which would include public exhibitions, a lecture hall, library, classrooms, offices and conference spaces as well as the Holocaust Center's archives, which may help satisfy the demand for existing and future recreational uses for nearby residents and employees. On a citywide/regional basis, the increased use of recreational facilities from the new employees attributable to the proposed project would be negligible given the number of existing and planned recreational facilities in the area and throughout the City as well as the temporary nature of employees' presence in the area. For these reasons, implementation of the proposed project would not be expected to increase the use of existing recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. This impact would be ***less than significant***, and no mitigation measures are necessary.

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. -Less than Significant–

The proposed project is a cultural and educational center, which would include public exhibitions, a lecture hall, library, classrooms, offices and conference spaces as well as the Holocaust Center's archives, which may partially offset the demand for recreational facilities. In addition, the project site is located within a quarter mile of various existing recreational facilities, including a library and parks. It is anticipated that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by the project. For these reasons, the construction of new or the expansion of existing recreational facilities would not be required. This impact would be ***less than significant***, and no mitigation measures are necessary.

Impact C-RE-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to recreation. -Less than Significant–

Cumulative development in the project vicinity would result in an intensification of land uses and an increase in the use of nearby recreational resources and facilities. The Recreation and Open Space Element of the General Plan provides a framework for providing a high-quality open space system for its residents, while accounting for expected population growth through year 2040. In addition, San Francisco voters passed three bond measures, in 2008, 2012 and 2020, to fund the acquisition, planning, and renovation of the City's network of recreational resources. As discussed above, there are several other open spaces and recreational facilities within walking distance of the project (typically, one quarter mile). In addition, the proposed project would itself be a source of recreational space for community use. Thus, it is expected that these existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by nearby cumulative projects without resulting in physical degradation of recreational resources. For these reasons, the proposed project would not combine with other projects in the vicinity to create a significant cumulative impact on recreational facilities.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
12. 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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

The project site is within an urban area that is served by existing utility service systems, including water, wastewater and stormwater collection and treatment, solid waste collection and disposal, electric power, natural gas, and telecommunications facilities. The proposed project would add a new daytime and evening population to the site in the form of employees and visitors; this increased non-residential population would subsequently increase the demand for utilities and service systems on the site.

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

The San Francisco Public Utilities Commission (SFPUC) provides and operates water supply and wastewater/stormwater collection and treatment facilities for the city. Pacific Gas and Electric Company provides electricity and natural gas to the project site, and various private companies provide telecommunication facilities. The project site is served by San Francisco's combined sewer system, which collects and treats most of the wastewater and stormwater at one of the three SFPUC treatment facilities.

The Southeast Treatment Plant provides wastewater and stormwater treatment and management for the east side of the city, including the project site.

Implementation of the proposed project would incrementally increase wastewater flows from the project site due to the introduction of employees and visitors, with an anticipated maximum of 125 visitors five to eight times per year (see Table 3 above). The proposed project would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations (CCR) 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 infrastructure capacity plans 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 proposed project would not require the construction of new or expansion of existing wastewater treatment facilities.

The project site is fully developed with impervious surfaces; therefore, the proposed project would not create additional impervious surfaces. The proposed project would be required to comply with the San Francisco Stormwater Management Ordinance (Ordinance No. 83-10),[72] adopted in 2010 and amended in 2016, and the 2016 Stormwater Management Requirements and Design Guidelines,[73] which would require the project to reduce or eliminate the existing volume and rate of stormwater runoff discharged from the project site. In addition, for projects replacing 5,000 square feet or more of impervious surface, such as the proposed project, stormwater flows are required to be reduced by 25 percent over existing conditions. To achieve these objectives, the proposed project would be required to implement and install appropriate stormwater management systems that retain runoff on site, promote stormwater reuse, and limit (or eliminate altogether) site discharges from entering the city's combined stormwater/sewer system. Therefore, the proposed project would not substantially increase the amount of stormwater runoff to the extent that existing facilities would need to be expanded or new facilities would need to be constructed.

The proposed project would result in an incremental increase in the demand for electricity and telecommunications (the project would not utilize natural gas); however, this modest increase would not exceed the demand expected and provided for in the project area by utility service providers. As discussed in Impact UT-2 below, the proposed project would result in an incremental increase in the demand for water supply, but would not by itself result in the need for the construction of new or expanded water treatment facilities or delivery infrastructure.

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

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[72] City and County of San Francisco, Ordinance No. 83-10, Requiring the Development and Maintenance of Stormwater Management Controls, 2010.

[73] City and County of San Francisco, Stormwater Management Requirements and Design Guidelines, 2016, Available: https://sfpuc.org/sites/default/files/documents/SMR_DesignGuide_May2016.pdf. Accessed: July 31, 2025.

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

The San Francisco Public Utilities Commission (SFPUC) adopted the 2020 Urban Water Management Plan (2020 plan) in June 2021.[74] The 2020 plan estimates that current and projected water supplies will be sufficient to meet future demand for retail water[75] customers through 2045 under wet- and normal-year conditions; however, in dry years, the SFPUC would implement water use and supply reductions through its Water Shortage Contingency Plan and a corresponding Retail Water Shortage Allocation Plan.[76]

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 to maintain the health of our rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment).[77] 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.

Implementation of the Bay-Delta Plan Amendment is uncertain for several reasons and whether, when, and the form in which the Bay-Delta Plan Amendment would be implemented, and how those amendments could affect SFPUC's water supply, is currently unknown. In acknowledgment of these uncertainties, the 2020 plan 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 would be applicable;
2. With implementation of a voluntary agreement between the SFPUC and the State Water Resources Control 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); and

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[74] SFPUC, 2020 Urban Water Management Plan for the City and County of San Francisco, adopted June 11, 2021. Available: https://www.sfpuc.org/about-us/policies-plans/urban-water-management-plan. Accessed: August 1, 2025.

[75] "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.

[76] 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. Available: https://www.sfpuc.org/about-us/policies-plans/urban-water-management-plan. Accessed: August 1, 2025.

[77] 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.

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 would be applicable.[78]

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 voluntary agreement would be between those with and without implementation of the Bay-Delta Plan Amendment.

Under these three scenarios, the SFPUC would have adequate water to meet demand in San Francisco through 2045 in wet and normal years.[79] Without implementation of the Bay-Delta Plan Amendment, water supplies would be available to meet demand in all years except for a 4.0 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 11.2 million gallons per day (15.9 percent) in a single dry year to 19.2 million gallons per day (27.2 percent) in years two through five of a multiple year drought based on 2025 demand levels and from 20.5 million gallons per day (25.4 percent) in a single dry year to 28.5 million gallons per day (35.4 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.[80] The proposed project would result in approximately 34,100 square feet of cultural and educational space; 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

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[78] On March 26, 2019, the SFPUC adopted Resolution No. 19-0057 to support its participation in the voluntary agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency. The SFPUC submitted a proposed project description that could be the basis for a voluntary agreement to the state water board on March 1, 2019. As the proposed voluntary agreement has yet to be accepted by the state water board as an alternative to the Bay-Delta Plan Amendment, the shortages that would occur with its implementation are not known with certainty; however, if accepted, the voluntary agreement would result in dry year shortfalls of a lesser magnitude than under the Bay-Delta Plan Amendment.

[79] 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.

[80] 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.

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 impacts on the environment that were not identified in the PEIR. 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).[81] The development proposed by the project would represent 7 percent of the 500,000 square feet of commercial space provided in section 15155(1)(B). In addition, the proposed project would incorporate water-efficient fixtures as required by Title 24 of the California Code of Regulations and the city's Green Building Ordinance. 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.

Assuming the project would demand no more than 50,000 gallons of water per day, its water demand would represent a small fraction of the total projected demand, ranging at most from 0.07 to 0.06 percent between 2025 and 2045. 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 35.4 percent in a multi-year drought. The SFPUC has indicated that 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 2022 and result in a dry-year shortfall, the expected

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[81] 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.

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***.

Impact UT-3: The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. -Less than Significant–

In September 2015, the city entered into a landfill disposal agreement with Recology, Inc. for disposal of all solid waste collected in San Francisco, at the Recology Hay Road Landfill in Solano County, through September 2024 or until 3.4 million tons have been disposed, 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, whichever occurs first.[82] 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.[83] (see discussion below). At the current rate of disposal, the landfill closure has an operating capacity until 2041. The city's contract with the Recology Hay Road Landfill will extend until 2031 or when the city has disposed five 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.

Further, the proposed project would be required to implement the city's Mandatory Recycling and Composting Ordinance (No. 100-09), the objective of which is to minimize the city's landfill trash generation. In compliance with this ordinance, the proposed project would be required to provide convenient facilities for the separation of recyclables, compostables, and landfill trash for its users. Occupants of the project site would be required to separate disposed material.

Project construction would generate demolition and construction waste. The city's Construction and Demolition Debris Recovery Ordinance prohibits construction and demolition material from being taken to landfill or placed in the garbage. All mixed debris must be transported by a registered hauler to a registered

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[82] 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. Available: http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf. Accessed: August 1, 2025.

[83] Ibid.

facility to be processed for recycling, and source separated material must be taken to a facility that recycles or reuses those materials.

As discussed above, the city has access to adequate landfill capacity at least through 2031 and potentially through 2041 and anticipates that an adequate alternative site will be identified at that point. On this basis, the city has adequate solid waste capacity to serve the proposed project, and the project's impact with respect to landfill capacity would be ***less than significant***. No mitigation measures are required.

Impact UT-4: The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. -No Impact–

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment show that the city generated approximately 870,000 tons of waste material in 2000. By 2010, that figure decreased to approximately 455,000 tons. Waste diverted from landfills is defined as recycled or composted. San Francisco had a goal of 75 percent landfill diversion by 2010 and 100 percent by 2020.[84] After exceeding the 75 percent diversion goal two years earlier, the City updated the zero-waste goal in September 2018 with the two targets of (1) reducing municipal solid waste generation by 15 percent by 2030 and (2) reducing disposal to landfill and incineration by 50 percent by 2030.[85]

San Francisco's Construction and Demolition Ordinance (Ordinance No. 27-06) requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. Furthermore, San Francisco Ordinance No. 100-09 (the Mandatory Recycling and Composting Ordinance) requires everyone in San Francisco to separate their solid waste into recyclable, compostable, and trash. The proposed project would be subject to and would comply with San Francisco Ordinance No. 27-06, San Francisco Ordinance No. 100-09, and all other applicable statutes and regulations related to solid waste. In addition, as discussed in Section E.17: Hazards and Hazardous Materials, soils from excavation activities could be classified as a California hazardous waste. Accordingly, the proposed project would be required to follow state and federal regulations related to the disposal of hazardous wastes, and hazardous wastes would be transported to a permitted disposal or recycling facility. The proposed project would comply with all applicable local, state, and federal laws and regulations pertaining to solid waste, and there would be ***no impact***.

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–

Implementation of the proposed project, in combination with cumulative development in the project vicinity would result in an incremental increase in population, water consumption, and wastewater and solid waste

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[84] City and County of San Francisco. Resolution No. 679-02. Resolution for 75% Waste Diversion Goal. October 11, 2002.

[85] San Francisco Department of the Environment. *Zero Waste – Frequently Asked Questions (FAQs)*. https://sfenvironment.org/zero-waste-faqs. Accessed: July 31, 2025.

generation. The SFPUC has accounted for such growth in its water demand and wastewater service projections, and the city has implemented various programs to divert solid waste from landfills. For these reasons, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact on utilities and service systems; these impacts would be ***less than significant***.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
13. 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?	☐	☐	☒	☐	☐

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 and Emergency Medical Services

The San Francisco Fire Department (fire department) provides fire suppression services and unified emergency medical services and transport, including basic life support and advanced life support services in the city. In addition, several privately operated ambulance companies are authorized to provide advanced life support services. The fire department responds to non-life-threatening fire and medical emergencies (Code 2) as well as life-threatening fire and medical emergencies (Code 3). Response times are measured from the time a unit is dispatched to the time the unit arrives at the scene. According to San Francisco's Emergency Medical Services Agency policy, the target response time for a life-threatening emergency medical incident should be within 10 minutes 90 percent of the time.[86] The San Francisco Fire Department has met the 90 percent target in five out of the last seven fiscal years, and narrowly missed the target in the last two years of reporting despite the financial year of 2023 having substantially more life-threatening emergency incidents than any year in the prior 10 years.[87]

The fire department consists of three divisions, which are subdivided into 10 battalions and 45 active stations throughout the city. The project site would be served by Fire Station No. 5, located at 1301 Turk Street,

[86] Data SF, Ambulance Response to Life-Threatening Emergencies, Available: https://www.sf.gov/data--ambulance-response-life-threatening-emergencies. Accessed: July 30, 2025.

[87] Ibid

approximately 0.6 mile southeast of the project site.[88] Implementation of the proposed project would result in a more intensive use of the project site than currently exists. The proposed project's increase in use at the project site would therefore increase demand for fire protection and emergency medical services. However, this increase in demand would not be substantial given the overall demand for such services on a citywide basis. Furthermore, the fire department conducts ongoing assessments of its service capacity and response times to maintain acceptable service levels, given the demand resulting from changes in population.

The proposed project would be required to comply with all applicable building and fire codes, which establish requirements pertaining to fire protection systems, including but not limited to the provision of state-mandated smoke alarms, fire alarms, and sprinkler systems, fire extinguishers, required number and location of egress with appropriate distance separation, and emergency response notification systems. In addition, the proposed project would be required to comply with the California Fire Code requirements as well as approved water supply capable of supplying the required flow for fire protection. Because the proposed project would be required to comply with all applicable building and fire codes, and the proposed project would result in an incremental increase in demand for service and oversight, it would not result in the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, the proposed project would have a ***less-than-significant*** impact on fire protection and emergency services and no mitigation measures would be required.

Police Protection Services

The San Francisco Police Department, headquartered at 850 Bryant Street in the Hall of Justice, provides police protection services for the city. The police department's Northern Station, at 1125 Fillmore Street, is the nearest police station, located approximately 0.5 mile southeast of the project site.[89] With the addition of the institutional and educational uses, the proposed project would result in a more intensive use at the project site compared with current conditions. Therefore, it may incrementally increase the number of police service calls in the project area. The police department conducts ongoing assessments of its staffing and facility needs as part of the city's annual operating and capital budget process. This increase in demand would not be substantial given the overall demand for such services on a citywide basis and the low number of additional residents added to the area. As such, the proposed project would not require the construction of new or alteration of police existing facilities. This impact would be ***less than significant***, and no mitigation measures would be required.

School Facilities

The proposed project would not include any residential units and, thus, would not directly contribute to school-aged children or the demand of school services. Therefore, implementation of the proposed project would not result in a demand for school facilities and would not require the construction of new or alteration of existing school facilities. The proposed project would have ***no impact*** with respect to schools.

Other Public Services

Because the proposed project would not include new residential units, increased demand for government services and facilities is not anticipated with proposed project implementation. Although some employees

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[88] San Francisco Fire Department, *Fire Station Locations*, Available: https://sf-fire.org/fire-station-locations. Accessed: July 30, 2025.

[89] San Francisco Police Department, *Station Finder*, Available: https://sanfranciscopolice.org/your-sfpd/sfpd-stations/station-finder. Accessed: July 30, 2025.

may use government services and facilities, such use would not be expected to rise to a level that could not be accommodated by existing facilities. Therefore, this impact would be ***less than significant***, 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–

Cumulative development in the project vicinity would result in an intensification of land uses and a cumulative increase in the demand for fire protection, police protection, school services, and other public services. The fire department, the police department, the school district, and other city agencies respond to growth and other changing service needs through ongoing analysis of applicable metrics, such as staffing, capacity, response times, and call volumes. As a result, projected future development would not result in any service gap in citywide fire, police, emergency medical services, and libraries. Therefore, the proposed project would not combine with reasonably foreseeable future projects in the project vicinity to create a significant cumulative impact on public services, and this impact would be ***less than significant***.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
14. 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?	☐	☐	☐	☐	☒

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
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 paved with two existing buildings and is located within a built urban environment. The project site does not contain any riparian habitat, other sensitive natural community, or federally protected wetlands. There are no adopted Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, state, or regional habitat conservation plans that apply to the project site. Therefore, D.14(b), D.14(c), and D.14(f) are not applicable to the proposed project.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species and would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. -Less than Significant–

The project site is covered entirely by impervious surfaces. Therefore, it does not provide habitat for any special-status plant or wildlife species. Thus, implementation of the proposed project would not affect the habitat of any species. However, San Francisco is situated along the Pacific Flyway— a migratory route used by numerous avian species.[90] Nesting birds, their nests, and eggs are fully protected by the California Fish and Game Code, which prevents the unlawful take of birds, or the Migratory Bird Treaty Act, which prohibits the take of migratory birds.[91] Although the proposed project would be subject to the Migratory Bird Treaty Act, the site does not contain habitat that supports migratory birds. The proposed project would construct a new building that would be taller than the buildings currently at the project site. The location, building height, and building materials, particularly transparent or reflective glass, may present risks for birds as they travel along their migratory path.

[90] Water Education Foundation. Pacific Flyway. Available: https://www.watereducation.org/aquapedia/pacific-flyway. Accessed: August 13, 2025.

[91] U.S. Fish and Wildlife Service. Digest of Federal Resource Laws of Interest to the U.S. Fish and Wildlife Service. Migratory Bird Treaty Act of 1918. Available: https://www.fws.gov/laws/lawsdigest/migtrea.html. Accessed: August 13, 2025.

The city has adopted guidelines to address the potential for bird strikes and provided regulations for bird-safe design within the city.[92] Planning Code section 139, Standards for Bird-Safe Buildings, establishes building design standards to reduce avian mortality rates associated with bird strikes. The building standards are based on two types of hazards: (1) location-related hazards which pertain to new buildings within 300 feet of an urban bird refuge, and (2) feature-related hazards such as free-standing glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet or larger in size. Any project that contains building-feature hazards must apply bird-safe glazing treatments on 100 percent of the feature in compliance with section 139.

The project site is not located within 300 feet of an Urban Bird Refuge; therefore, the standards for location-related hazards are not applicable to the proposed project.[93] The proposed project would comply with the feature-related hazard standards on 100 percent of any building feature-related hazards, as it would not be largely glass-clad, and includes only portions of glass areas on the building façade. Compliance with the city's bird-safe building standards would ensure the proposed project does not interfere with the movement of a native resident or wildlife species, or with an established native resident or migratory wildlife corridor.

For the reasons stated above, the proposed project would result in ***less-than-significant*** impacts to special-status species and native resident, wildlife species, or migratory birds. No mitigation measures would be required.

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 project site does not contain any protected trees as defined by the San Francisco Urban Forestry Ordinance, which is codified as article 16 of the public works code.[94] The removal of street trees or significant trees, as well as the planting of new street trees, is subject to the provisions of the ordinance.

Demolition of the existing buildings and construction of the proposed project would require removal of the four street trees along Post Street, subject to review and approval by San Francisco Public Works. The proposed project would plant two new street trees along Post Street and satisfy the in-lieu fee for the remaining planting requirement under Public Works Code Section 806(d)(4)(A). The final location and number of plantings will be approved by Public Works. The proposed project would not conflict with any local policies or ordinances that protect biological resources. The impact would be ***less than significant***. No mitigation measures would be required.

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[92] San Francisco Planning Department. Standards for Bird-Safe Buildings. Available: https://sfplanning.org/sites/default/files/documents/reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf. Accessed: August 13, 2025.

[93] City and County of San Francisco. Urban Bird Refuge. Available: https://sfplanning.org/sites/default/files/resources/2018-08/Urban%20Bird%20Refuge.pdf. Accessed: August 13, 2025.

[94] Street trees and significant trees are defined in Article 16, Section 802 and 810A, respectively, of the San Francisco Public Works Code.

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 cumulative development projects identified in Section B (Project Setting) would result in an overall intensification of land uses with the surrounding dense urban environment, as is typical of infill development. As noted above, the project site is fully developed covered with impervious surfaces and does not provide habitat of any special-status plant or wildlife species. However, the proposed project and other nearby projects would add moderately taller buildings in the vicinity, which could, in the event of a bird strike, injure or kill birds. However, as with the proposed project, nearby cumulative projects would be subject to the Migratory Bird Treaty Act, which protects special-status bird species; The California Fish and Game Code; and the bird-safe building and urban forestry ordinances. As with the proposed project, compliance with these ordinances would reduce the effects of other development projects to less-than-significant levels. Therefore, the proposed project would not combine with cumulative development projects to result in significant cumulative impact related to biological resources. Cumulative impacts on biological resources would be ***less than significant***, and no mitigation measures are necessary.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
15. 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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
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?	☐	☐	☒	☐	☐

The proposed project would connect to the existing sewer system; there would be no use of septic tanks or alternative wastewater disposal systems for the proposed project. Therefore, topic D.15(e) is not applicable.

This section describes the geology, soils, and seismicity characteristics of the project area as they relate to the proposed project. The analysis in this section is based on the geotechnical report prepared for the proposed project by an independent consultant.[95] This geotechnical report is the primary source of information included in this section.

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

Fault Rupture. The project site is not located within an earthquake fault zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known fault or potentially active fault exists within the project site.[96] In a seismically active area, such as the San Francisco Bay Area, the remote possibility exists for future faulting in areas where no faults were previously known to exist, but the likelihood of such fault rupture is extremely low. Therefore, this impact would be ***less than significant***.

Ground Shaking. The San Andreas, Hayward, San Gregorio faults are the closest major faults to the project site. The project site is approximately 11 miles west the San Andreas Fault Zone, 19 miles west of Hayward Fault Zone, and 16 miles west of the San Gregorio Fault Zone.[97] In addition, according to the U.S. Geological Survey, the overall probability of moment magnitude 6.7 or greater earthquake to occur within the San Francisco Bay Area during the next 30 years is 72 percent.[98] The proposed project would most likely experience periodic minor earthquakes and perhaps a major earthquake (moment magnitude greater than 6) on one of the nearby faults during its service life.

[95] Rockridge Geotechnical. Geotechnical Investigation Proposed Holocaust Center Building, 2245 and 2255 Post Street, San Francisco, California. January 30, 2025. Project No. 23-2375.

[96] Ibid.

[97] Ibid.

[98] U.S. Geological Survey, Uniform California Earthquake Rupture Forecast (UCERF3), Fact Sheet 2015-2009, UCERF3: A New Earthquake Forecast for California's Complex Fault System, March 2015.

The proposed project would demolish two existing buildings on the project site and would be supported by either conventional spread footings bearing on dense native sand, or a mat foundation would be sued in lieu of footings in all or a portion of the building. The project is anticipated to include excavation for a lower level and foundations to extend to a depth of about 15 to 22 feet below ground surface. As the lower level will occupy the entire site, it was determined that sloping of the excavation sides would not be feasible, and temporary shoring would be required. A soldier pile and lagging shoring system with one row of tiebacks was determined to be the most appropriate shoring method for the northern and southern sides of the excavation.[99]

To ensure that the potential for adverse conditions related to geology and soils are adequately addressed, San Francisco relies on the state and local regulatory process for review and approval of building permits, pursuant to the California Building Code and the San Francisco Building Code, which is the state building code plus local amendments that supplement the state code, including the building department's administrative bulletins. The proposed project would be required to follow the building department's local implementing procedures, including administrative bulletins, which are part of the local building code, and information sheets, which clarify building department requirements and procedures. On November 21, 2018, the building department issued Administrative Bulletin AB-082, Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review,[100] superseding AB-082, originally issued March 25, 2008, and revised December 19, 2016. The guidelines describe the review process for structural, geotechnical, and seismic hazard engineering design, including the characteristics considered in determining whether review is required and identifying the type of required review.

Because of the building department's permit review process, ensuring that structural and foundation plans comply with applicable building code provisions, and conform to the measures recommended in the project-specific geotechnical report and the recommendations made by the engineering design review team, as required by AB-082, the impacts of the proposed project related to strong seismic ground shaking would be ***less than significant***.

Landslides, Liquefaction, Lateral Spreading, and Seismic Settlement. With respect to landslides, the project site is generally flat and not within a mapped landslide zone or within a designated earthquake-induced landslide zone. Similarly, the project is not within a mapped liquefaction zone.[101]Therefore, the proposed project would have no impact with respect to the potential for landslides or liquefaction, and these topics are not discussed further. The project site was also found to have a low potential for liquefaction-induced ground failures, such as lateral spreading, occurring at the site during a major earthquake.

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[99] Rockridge Geotechnical. Geotechnical Investigation Proposed Holocaust Center Building, 2245 and 2255 Post Street, San Francisco, California. January 30, 2025. Project No. 23-2375.

[100] San Francisco Department of Building Inspection, Administrative Bulletin 082, Guidelines and Procedures for Structural Design Review, November 21, 2018, Updated 01/01/2020 for code references. Available: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_building/0-0-0-95162. Accessed: August 29, 2025.

[101] Rockridge Geotechnical. Geotechnical Investigation Proposed Holocaust Center Building, 2245 and 2255 Post Street, San Francisco, California. January 30, 2025. Project No. 23-2375.

While the risk of liquefaction and lateral spreading is considered to be low,[102] the building department permit review process would ensure that the project's structural and foundation plans comply with applicable building code provisions and conform to the measures recommended in the project-specific geotechnical investigation. Conformance with the review process and recommendations made by the engineering design review team, as required by AB-082, would ensure that the proposed project would not exacerbate the potential for seismic-related ground failure, including liquefaction and lateral spreading. Therefore, this impact would be ***less than significant***.

Although the proposed project would be located in a seismically active area, it would not exacerbate the potential for fault rupture, ground shaking, or liquefaction-related geologic hazards. The proposed project design and compliance with applicable building standards, Administrative Bulletin AB-083, and the Seismic Hazards Act would minimize potential hazards. Therefore, this impact would be ***less than significant***, and no mitigation measures are required.

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

Site preparation and excavation activities would disturb approximately 8,700 square feet of soil to a depth of approximately 18 feet below ground surface, which would require excavation of approximately 5,600 cubic yards of material, creating the potential for windborne and waterborne soil erosion. The project site is generally flat, covered with impervious surfaces and underlain by densely packed sand; therefore, it does not contain native topsoil. Grading and excavation would expose topsoil on site and could potentially result in erosion. However, the project sponsor and their 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 (BMPs) to minimize surface runoff erosion and sedimentation.[103]

Pursuant to section 146.7, construction of the proposed project would disturb more than 5,000 square feet of ground surface and, therefore, the project sponsor must develop an erosion and sediment control plan. The erosion and sediment control plan must be submitted to public utilities commission for review and approval prior to commencing construction-related activities. The erosion and sediment control plan would identify BMPs to control discharge of sediment and other pollutants from entering the city's combined sewer system during construction.

Additionally, 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. The city's stormwater management ordinance includes requirements that would reduce stormwater runoff discharged from the project site.

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[102] Ibid.

[103] SFPUC, San Francisco Construction Site Runoff Control Program. Available: https://www.sfpuc.gov/programs/pretreatment-program/construction-site-runoff. Accessed: August 29, 2025.

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 would be less than significant and no mitigation would be required.

For these reasons, impacts related to soil erosion or loss of topsoil would be ***less than significant.*** No mitigation measures would be required.

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

As discussed under Impact GE-1, the project site is not within an area susceptible to landslides and the potential for lateral spreading to impact the proposed building foundation is low. The project site and vicinity do not include any hills or cut slopes that could cause or be subject to a landslide or soil movement. The proposed project would not include the injection or extraction of water or any liquids and therefore, would not be subject to or cause subsidence. The proposed project is required to comply with the provisions of the California Building Code and the San Francisco Building Code that address issues related to seismic safety and unstable soil.

The proposed project would be supported by either conventional spread footings bearing on dense native sand, or a mat foundation would be sued in lieu of footings in all or a portion of the building. The project is anticipated to include excavation for a lower level and foundations to extend to a depth of about 15 to 22 feet below ground surface. As the lower level will occupy the entire site, it was determined that sloping of the excavation sides would not be feasible, and temporary shoring would be required. A soldier pile and lagging shoring system with one row of tiebacks was determined to be the most appropriate shoring method for the northern and southern sides of the excavation. Settlement from the new building loads would occur beyond the perimeter of the site, and could affect adjacent structures. Underpinning[104] can be used to address the effects of settlement on the adjacent buildings that are supported on shallow footings; underpinning may be required if the neighboring buildings do not have basements and are supported by shallow foundations.[105] The geotechnical report also includes recommendations for the following aspects of construction: demolition and site preparation; grading; excavation; foundation; and underpinning.

The proposed project would be required to comply with the mandatory provisions of the California Building Code and San Francisco Building Code. Adherence to these requirements would 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.

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[104] Underpinning is strengthening and reinforcing an existing foundation of a structure, typically by extending the depth and breadth of the foundation.

[105] Rockridge Geotechnical. Geotechnical Investigation Proposed Holocaust Center Building, 2245 and 2255 Post Street, San Francisco, California. January 30, 2025. Project No. 23-2375.

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 near-surface soil fluctuate from saturated to low-moisture-content conditions and back again. Determinations regarding the presence of expansive soils are typically based on site-specific data. As outlined in the geotechnical investigation, the site is underlain by Quaternary-age beach and dune sand, which is medium-dense to very dense to the maximum depth explored of about 51 feet below ground surface. Due to the low clay content within the dune sands, there would be a low likelihood for expansion, although clayey sand could result in some expansion-related effects. Areas not excavated, including sidewalks and other adjacent improvements, may also be affected by expansive soils, if present. Loose sand above the groundwater level may be subject to differential compaction and settlement during strong ground shaking. Because the excavation for the planned lower level would extend to about 18 feet below ground surface, a portion of sand above the groundwater level would be removed. Therefore, differential compaction should not be an issue at the project site. Additionally, the San Francisco Building Code requires that the project applicant include analysis of the potential for soil expansion impacts for building department review and approval as part of the design-level geotechnical investigation and address these effects in the design documents prepared for the proposed project. As such, potential impacts related to expansive soils would be ***less than significant***.

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

A unique geologic feature embodies distinctive characteristics of any regional or local geologic principles, provides a key piece of information important to geologic history, contains minerals not known to occur elsewhere in the county, and/or is used as a teaching tool. Unique geologic features may be exposed or created from natural weathering and erosion processes, or from human excavations. The project site is located within a heavily modified urban environment and does not contain any unique geologic features. Therefore, no impact to unique geologic features would occur. No mitigation is required.

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates from a previous geological period. Paleontological resources are deposited and preserved within particular lithologic (rock) units. Lithologic units that may contain fossils include sedimentary and volcanic formations. Collecting localities and the geologic formations containing those localities also are considered paleontological resources because they represent a limited, nonrenewable resource that, once destroyed, cannot be replaced. Paleontological potential consists of both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, plant, or trace fossils and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data.[106] These data are important because they are used to examine evolutionary relationships, provide insight on the development of and

[106] Society of Vertebrate Paleontology (SVP), 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology, Impact Mitigation Guidelines Revision Committee.

interaction between biological communities, establish time scales for geologic studies, and for many other scientific purposes.

Paleontological "sensitivity" is defined as the potential for a geologic unit to produce scientifically significant fossils. The potential of geologic units in a particular area to yield unique paleontological resources depends on the geologic age and origin of the units as well as on the processes they have undergone, both geologic and anthropogenic.[107]

For assessment of paleontological resource impacts, each surficial geologic unit in the City is assigned a paleontological potential level, based on the potential fossil yield classification system for paleontological resources developed by the U.S. Bureau of Land Management in consultation with qualified experts, regarding the geologic units in San Francisco.[108] Under this system, the classification of geologic units is based on the relative abundance of scientifically significant paleontological resources and their potential to yield paleontological resources. This system provides guidance for predicting, assessing, and mitigating impacts on paleontological resources. The levels of potential (i.e., very low, low, moderate, high, very high, and unknown) are defined as outlined below.[109] Surficial geologic unit mapping does not account for the paleontological potential of underlying geologic units. It is possible for a geologic unit with moderate paleontological potential, for example, to underlie a surficial geologic unit with low or very low potential.

> **Very Low Potential:** Geologic units (Precambrian Age) are not likely to contain recognizable paleontological resources. Units are igneous or metamorphic, excluding air-fall and reworked volcanic ash. Potential for significant paleontological resource impact is usually negligible, and impact reduction requirement is unnecessary except in rare or isolated circumstances. This unit is designated with the identifier "1" under the city's paleontological resource impact evaluation guidelines.
>
> **Low Potential:** Geologic units (i.e., younger than 10,000 years before present (recent aeolian deposits) are not likely to contain paleontological resources. Fossil preservation is unlikely. The potential for a significant paleontological resource impact is generally low; an impact reduction requirement is usually unnecessary, except in rare or isolated circumstances. This unit is designated with the identifier "2" under the city's paleontological resource impact evaluation guidelines.
>
> **Moderate Potential:** Sedimentary geologic units (marine in origin) where fossil content varies in significance, abundance, and the predictability of occurrence. The potential for a significant paleontological resource impact is moderate. Impact reduction options could include record searches, pre-disturbance surveys, monitoring, mitigation, or avoidance. A preconstruction study may be required. This unit is designated with the identifier "3" under the city's paleontological resource impact evaluation guidelines.
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> **High Potential:** No occurrence in San Francisco.

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[107] Anthropogenic means caused by human activity.

[108] U.S. Department of the Interior, Bureau of Land Management, *Potential Fossil Yield Classification System*, 2016. https://www.blm.gov/sites/blm.gov/files/uploads/IM2016-124_att1.pdf. Accessed: August 29, 2025.

[109] Ibid.

Very High Potential: No occurrence in San Francisco.

Unknown Potential: Geologic units that cannot receive an informed class assignment or have not been studied in detail; reports of finds are anecdotal and unverified. Geological units may exhibit features or preservation conditions that suggest unique paleontological resources could be present, but little information about the actual paleontological resources of the unit or area is known. There is no information on the age of the unit. In San Francisco, this applies to units that are listed as being Holocene to Pleistocene. Holocene-age sediments are generally considered too young to contain in situ fossils. Pleistocene-age sediments have produced Ice Age fossils in San Francisco. Based on the mapping of surface geology, most areas in San Francisco are classified as having unknown paleontological resource sensitivity. Because of the unknown sensitivity potential, mitigation during ground-disturbing activities may be necessary. This unit is designated with the identifier "U" under the city's paleontological resource impact evaluation guidelines.

Subsurface project construction would include excavations ranging from 15 to 22 feet deep. As described under Impact GE-4, the project site is directly underlain by quaternary dune sand to a depth of approximately 51 feet, far below the depth that would be affected by the proposed project. The sand would have a low potential to encounter paleontological resources. Due to the low likelihood of encountering fossil containing beds during construction, any impacts on paleontological resources would be ***less than significant***.

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

Geology, soil, and paleontological impacts are generally site specific and localized. Cumulative projects could require various levels of excavation or cut-and-fill activity, which would affect local geologic conditions and could affect paleontological resources. However, cumulative projects would also be subject to building department requirements regarding geotechnical review and the state and local building codes. In addition, site-specific geotechnical review and monitoring for paleontological resources would reduce each project's impacts associated with geology, seismic safety, and paleontological resources. Furthermore, site-specific mitigation would be developed, when necessary, based on site conditions. Similar to the proposed project, the cumulative project listed in Section B (Project Setting), would be subject to these mandatory seismic safety standards and design review procedures. Compliance with these standards and procedures would ensure that the effects from nearby cumulative projects would be reduced to less-than-significant levels. For these reasons, the proposed project would not combine with cumulative projects in the project vicinity to create a significant cumulative impact related to geology and soils. Therefore, cumulative impacts would be ***less than significant***.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
16. 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?	☐	☐	☒	☐	☐
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?	☐	☐	☒	☐	☐

The project site is not located within a 100-year flood hazard area,[110] or an area identified as being subject to potential inundation in the event of a tsunami along the San Francisco coast.[111] 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 D.16(d) is not applicable to the proposed project and is not discussed below.

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

The proposed project would disturb soil to a maximum depth of approximately 18 feet over an area of 8,700 square feet for a total excavation of approximately 5,600 cubic yards of material, potentially affecting water quality in the area. Contaminants from construction vehicles and equipment, as well as sediment from soil erosion, could increase the pollutant load in runoff being transported to receiving waters during construction.

The project-specific geotechnical report identified groundwater to be present approximately 26 feet below ground surface.[112] Groundwater encountered during construction of the proposed project would be subject to the requirements of Article 4.1 of the San Francisco Public Works Code, Industrial Waste, which requires groundwater to meet specified water quality standards before it is discharged to the combined sewer system. These measures ensure the protection of water quality during construction, which represents a temporary condition. The Bureau of Systems Planning, Environment, and Compliance of the SFPUC must be notified regarding projects that necessitate dewatering. In this case, the SFPUC may require water quality analysis prior to discharge. The project sponsor would be required to obtain a Batch Wastewater Discharge Permit from the SFPUC Wastewater Enterprise Collection System Division prior to any dewatering activities.

Wastewater and stormwater from the proposed project would continue to flow into the City's combined stormwater and sewer system. Wastewater and stormwater would be treated to the effluent discharge standards contained within the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Additionally, the proposed project would be required to meet the standards for stormwater management identified in the San Francisco Stormwater Management Ordinance and meet the SFPUC stormwater management requirements, per the Stormwater Management Requirements and Design Guidelines.

To satisfy the SFPUC's 2016 Stormwater Management Requirements and Design Guidelines, the proposed project would also include the submission of a compliant Stormwater Control Plan for SFPUC approval. The proposed project would disturb more than 5,000 square feet of ground surface and would therefore also be required to comply with public works code Article 4.2, Sections 146 *et seq.* (Construction Site Runoff Control). A construction site runoff control permit would be obtained prior to any land-disturbing activities and would include an erosion and sediment control plan.

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[110] San Francisco Public Utilities Commission, Flood Maps: 100-Year Storm Flood Risk Map. Available: https://www.sfpuc.gov/learning/emergency-preparedness/flood-maps. Accessed: September 9, 2025.

[111] City and County of San Francisco, Community Safety Element of the San Francisco General Plan, 2012, Map 5 (Tsunami Hazard Zones San Francisco). Available: https://generalplan.sfplanning.org/Community_Safety_Element_2012.pdf. Accessed: September 9, 2025.

[112] Rockridge Geotechnical. Geotechnical Investigation Proposed Holocaust Center Building, 2245 and 2255 Post Street, San Francisco, California. January 30, 2025. Project No. 23-2375.

The proposed project's construction and operational activities would not substantially degrade surface water or groundwater quality or violate water quality standards and waste discharge requirements. Thus, the impact of the proposed project on water quality 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 currently almost entirely covered with impervious surfaces, with the exception of a small stand of trees along rear edge of the property at 2245 Post Street. Removal of this area would not interfere substantially with groundwater recharge. Compliance with the city's Stormwater Management Ordinance and the Stormwater Management Requirements and Design Guidelines would ensure that the design of the proposed project includes installation of 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 stated in Impact HY-1, groundwater was located approximately 26 feet below ground surface. Since excavations during construction of the proposed project would occur down to 18 feet below ground surface it is unlikely that groundwater would be encountered.

The project site is located within the downtown San Francisco groundwater basin. All groundwater resources are managed by the SFPUC's groundwater management program, ensuring that local groundwater resources designated for current or future beneficial uses are properly protected to prevent overdraft, pollution, or contamination. Project operation would not extract underlying groundwater supplies. 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's impact on groundwater would be less than significant, 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–

The project site does not contain any streams or creeks and contains only impervious surfaces, with the exception of a small stand of trees at the rear of 2245 Post Street. The proposed project is subject to the Stormwater Management Ordinance, which requires stormwater runoff to be reduced by 25 percent from existing conditions. Thus, the proposed project would be designed to incrementally reduce the amount of impervious surface material on the project site through implementation of low-impact development and other measures identified in the Stormwater Management Ordinance, which also requires a decrease in the

amount of stormwater runoff associated with a proposed project, per the City's Stormwater Management Requirements and Design Guidelines. The Stormwater Management Ordinance would help reduce the peak flow of the project site into the City's drainage system. Therefore, the project site's drainage patterns would not be adversely affected by the proposed project. As such, the proposed project would not be expected to result in substantial erosion or flooding associated with changes in drainage patterns; the potential to result in erosion or flooding would be similar to existing conditions. The impact would be ***less than significant***.

During construction and operation of the proposed project, all wastewater and stormwater runoff from the project site would be treated at the Southeast Water Pollution Control Plant. Treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for the plant. The proposed project would also be required to comply with all local water discharge, stormwater runoff, and water quality requirements, including the Stormwater Management Requirements and Design Guidelines, and the Stormwater Management Ordinance. Compliance with the Stormwater Management Requirements and Design Guidelines would ensure that stormwater generated by the proposed project would be managed on-site to reduce the runoff flow rate and volume for a 2-year 24-hour design storm by 25 percent, such that the proposed project would not contribute additional volumes of polluted runoff to the City's stormwater infrastructure. Compliance with the Stormwater Management Ordinance would ensure that the design of the proposed project would include the installation of appropriate stormwater management systems that would retain runoff on-site, promote stormwater reuse, and limit discharges from the site to the City's combined stormwater/sewer system. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. The proposed project would also not impede or redirect flood flows. Therefore, the proposed project would have a ***less than significant*** impact, and no mitigation measures are necessary.

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 noted under Impact HY-1 and Impact HY-3, the proposed project would be required to meet the standards for stormwater management and the City's NPDES permit and SFPUC stormwater management requirements. In addition, the proposed project would also have to comply with the appropriate water quality objectives for the region. Commonly practiced BMPs would be implemented to control construction site runoff and reduce the discharge of pollutants to storm drain systems from stormwater and other nonpoint-source runoff. As part of compliance with permit requirements during ground-disturbing or other construction activities, implementation of water quality control measures and BMPs would ensure that water quality standards would be achieved, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the basin plan.

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–

Cumulative development in the project area would result in an intensification of land uses in the project vicinity, similar to the proposed project and could result in an increase in polluted runoff and stormwater discharges. However, other development projects would be subject to the same water conservation and stormwater management regulations that are applicable to the proposed project. Because other

development projects would be required to comply with drainage, dewatering, and water quality regulations, similar to the proposed project, peak stormwater drainage rates and volumes for the design storm would gradually decrease over time with new development, meaning that no substantial cumulative project to less-than-significant levels. Therefore, the proposed project, in combination with past, present, and reasonably future projects, would not result in a significant cumulative impact related to hydrology and water quality. Cumulative impacts would be ***less than significant***. No mitigation measures are necessary.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
17. 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?	☐	☐	☒	☐	☐
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 is not located within an airport land use plan area, or within or adjacent to a wildland fire area. Therefore, topics E.17(e) and E.17(g) are not applicable.

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

Project construction would require the routine use of hazardous materials, such as fuels, lubricants, paints, and solvents for motorized heavy equipment (e.g., excavators, bulldozers, backhoes). During construction, minor maintenance activities and refueling of equipment and vehicles (from mobile or stationary fuel supply sources) could occur at the project site. If not managed responsibly, the routine transport, use, and disposal of hazardous materials could pose a risk to human health or the environment. For example, hazardous materials would have the potential to be spilled accidentally during maintenance, refueling, or servicing of

equipment and vehicles. Improperly disposed, spilled, or leaking hazardous materials could create a significant hazard to workers, the public, or the environment.

Hazardous materials handling, disposal, and transportation must occur in accordance with applicable federal, state, and local regulations. Handling of hazardous materials would need to be conducted in accordance with title 29, section 1910 of the Code of Federal Regulations. Transportation of hazardous materials would need to comply with the Resource Conservation and Recovery Act and U.S. Department of Transportation regulations. The Resource Conservation and Recovery Act also governs hazardous material disposal, ensuring that only facilities permitted to accept a specific waste are used.

In addition to federal regulations, workers handling hazardous materials would be required to adhere to California Occupational Safety and Health Administration health and safety requirements, which would include availability of safety equipment and preparation and implementation of emergency evacuation plans, health and safety plans, safety training, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention plans. Title 8 of the California Code of Regulations would require employee training, availability of safety equipment, accident prevention programs, and hazardous substance exposure warnings.

Title 8 also includes hazard communication program regulations that contain worker safety training and hazard information requirements, procedures for identifying and labeling hazardous substances, communicating hazard information related to hazardous substances and their handling, and preparing health and safety plans to protect workers. The construction contractor would be required to comply with mandatory regulatory requirements, which would minimize potential impacts related to routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Project operations would require the routine, handling, use and disposal of small quantities of commercially available materials, such as household cleaning and landscaping supplies, similar to the current uses in operation of the existing buildings. These materials would not be used in quantities that could create a significant hazard to public health or the environment. The impact would be ***less than significant***. 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–

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

The proposed project would excavate up to 5,600 cubic yards of soil to a depth of up to 18 feet below the ground surface. The project site is not in an area that is subject to the Maher Ordinance.[113] Therefore, the project site is not known or suspected to contain contaminated soil and/or groundwater.

The proposed project would include demolition of two existing onsite buildings that were constructed in 1947 (2245 Post Street) and 1965 (2255 Post Street) . Based on the building's date of construction, some of the building materials may pre-date the 1970s ban on the use of asbestos-containing materials and lead-based paint. Any hazardous materials currently on the site, such as asbestos or lead-based paint, would be removed during or prior to building demolition and project construction. The materials would be handled in compliance with applicable laws and regulations.

The California Department of Toxic Substance Control (DTSC) considers asbestos hazardous and requires removal of asbestos-containing materials 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 as well as air district, CAL/OSHA, 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 a project sponsor has demonstrated compliance with the notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos.

The California legislature vests the local air district, in this case the Bay Area Air Quality Management District, with the authority to regulate airborne pollutants, including asbestos-containing materials, through both inspection and law enforcement. The Air District is to be notified 10 days in advance of any proposed demolition or abatement work. Any disturbance of asbestos-containing materials at the project site would be subject to the requirements of the Air District Regulation 11, Rule 2, Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of Cal/OSHA must also be notified of asbestos abatement. Asbestos abatement contractors must follow state regulations contained in the CCR Title 8, section 1529 and sections 341.6 through 341.14, when their work involves 100 gross square feet or more of

[113] San Francisco Planning Department. San Francisco Property Information Map. Maher Ordinance. Available: https://sfplanninggis.org/pim/map/?search=1078021&layers=Maher%20Ordinance. Accessed: August 27, 2025.

asbestos-containing materials. Pursuant to California law, the building department would not issue the required permit until the project sponsor has complied with the requirements described above.

Additionally, as the existing buildings were constructed prior to 1979, it is highly likely that lead-based paint was used during its construction. Demolition activities could result in lead-based paint disturbance and must therefore comply with section 3423 of the San Francisco Building Code, Work Practices for Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Section 3423 identifies prohibited practices that may not be used when removing lead-based paint, as well as notification requirements. Section 3407 requires specific notification and work standards and identifies prohibited work methods and penalties for work that would disturb or remove lead-based paint on the exterior of a building.
The demolition would also be subject to the Cal/OSHA lead in construction standard (CCR Title 8, Section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead are disturbed during construction. The plan must describe activities that could emit lead, methods that would be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction. Cal/OSHA would require 24-hour notification if more than 100 square feet of lead-containing material would be disturbed.

Based on mandatory compliance with existing regulatory requirements, the proposed project would not result in a significant hazard to the public or environment from asbestos or lead-based paint, and the proposed project would result in a ***less-than-significant*** impact with respect to these hazards. No mitigation measures are necessary.

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 project site is within a quarter-mile of the following schools: Dr. William Cobb Elementary/Preschool, located north of the site at 2725 California Street; Gateway High School/Kipp SF Bay Academy, located south of the site at 1430 Scott Street; the Hearing & Speech Center of Northern California, located south of the site at 1234 Divisadero Street; and the Jewish Community High School of the Bay, located south of the site at 1835 Ellis Street. As discussed under Impact HZ-1, the proposed project would include the use of common household supplies for facilities maintenance that would not create a significant hazard to the public or the environment. The proposed project would therefore not create a significant hazard to the schools within a quarter-mile of the project site. The impact would be ***less than significant***. No mitigation would be required.

Impact HZ-4: The proposed project would not 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 not create a significant hazard to the public or the environment. -Less than Significant–

The project site is not listed on the Hazardous Waste and Substances Site List (commonly referred to as "Cortese List") compiled by DTSC pursuant to Government Code section 65962.5.[114] In addition, the project site is not in an area that is subject to San Francisco Health Code Article 22A, also known as the Maher Ordinance, meaning that the project is not known or suspected to contain contaminated soil and/or groundwater.[115]

The proposed project would not create a significant hazard to the public or the environment. This impact would be ***less than significant***, and no mitigation measures are necessary.

Impact HZ-5: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. -Less than Significant–

The city's Emergency Management Program is part of a jurisdiction-wide system that provides emergency management guidance related to the prevention, preparedness, response, and recovery. The city's Emergency Response Plan uses an all-hazards approach to emergency planning and, therefore, encompasses all hazards that are applicable to the city and county both natural and man-made, ranging from planned events to large-scale disasters.[116]

San Francisco ensures fire safety primarily through provisions of the building and fire codes. Final building plans including locations of hydrant water pressures and emergency access would be reviewed and approved by the fire department and building department, to ensure conformance with these provisions. 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. Implementation of the proposed project could add incrementally to transportation conditions in the immediate area in the event of an emergency evacuation. As discussed in above in Section E.5, Transportation, the proposed project contribution to traffic conditions would not be substantial and there would be no significant adverse impacts on transportation conditions. Therefore, the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. This impact would be ***less than significant***, and no mitigation measures are necessary.

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[114] California Department of Toxic Substances Control. EnviroStor Hazardous Waste and Substances Site List. Available: https://www.envirostor.dtsc.ca.gov/public/search.asp?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST. Accessed: August 27, 2025.

[115] San Francisco Planning Department. San Francisco Property Information Map. Maher Ordinance. Available: https://sfplanninggis.org/pim/map/?search=1078021&layers=Maher%20Ordinance. Accessed: August 27, 2025.

[116] City and County of San Francisco, Emergency Response Plan, December 2010. Available: https://onesanfrancisco.org/the-plan-2018/building-our-future-emergency-response. Accessed: August 27, 2025.

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

Impacts from hazards and hazardous materials are generally site specific and typically do not combine with impacts from cumulative projects to result in significant cumulative impacts. New developments in the vicinity of the project site would be subject to the same regulatory requirements as the proposed project. Therefore, large, unexpected releases of hazardous materials of the type that would contribute to significant cumulative impacts are not expected. Compliance with existing regulations pertaining to the treatment and management of hazardous materials would ensure that the proposed project would not combine with cumulative projects in the vicinity to result in a significant cumulative impact. Therefore, cumulative hazards impacts would be ***less than significant***, and no mitigation measures are necessary.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
18. 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–

Project construction would require the use of fuel- and electric-powered equipment and vehicles. The amount of fuel used for construction workers' commute trips would be limited to the duration of construction. Project construction would not encourage activities that would result in the use of large amounts of fuel, water, or energy, or use them in a wasteful manner.

The proposed project would be required to comply with title 24 of the California Code of Regulations and the 2022 San Francisco Green Building Code. New non-residential buildings that are 10 stories or less, such as the proposed project, are required to install solar electric, thermal, or green roofs, and to meet San Francisco's green building requirements tied to LEED and GreenPoint building rating systems. Documentation demonstrating compliance with title 24 would be submitted with a building permit application. The title 24 standards and requirements would be enforced by the San Francisco Department of Building Inspection. The proposed project would incorporate solar photovoltaic panels on the new building's roof. The energy generated from the solar photovoltaic panels would provide a sustainable form of power for the building. The proposed project also would meet the requirements of the All-Electric New Construction Ordinance, and would not include natural gas during project operations. Overall, it would minimize the

wasteful, inefficient, or unnecessary consumption of energy resources during operation. Therefore, 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–

State plans for renewable energy and energy efficiency include California's Renewables Portfolio Standard Program (as revised by Senate Bill No. 100)[117] and the California Energy Efficiency Strategic Plan. The renewables standard program requires utilities to increase their renewable energy generation to 60 percent by 2030, and for all of the state's electricity to come from carbon-free resources by 2045.[118] The plan, which was developed in 2008, outlines goals to improve the energy efficiency of new construction within all major sectors throughout the state. Local plans include the City of San Francisco's energy efficiency requirements. The proposed project would increase energy efficiency because the new building would adhere to current energy conservation measures, including those detailed in the San Francisco Green Building Code and title 24 of the California Energy Efficiency Standards. The proposed project would also comply with the All-Electric New Construction Ordinance. Solar photovoltaic panels would also be installed on the roof of the new building, generating sustainable energy during operation. Therefore, the proposed project would not conflict with or obstruct 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–

All development projects within San Francisco are required to comply with applicable regulations in the city's Green Building Ordinance and Title 24 of the California Code of Regulations that reduce both energy use and potable water use. The majority of San Francisco is located within a transportation analysis zone that experiences low levels of VMT per capita compared to regional VMT levels, as are the identified cumulative projects. Therefore, the proposed project, in combination with other reasonably foreseeable cumulative projects would not encourage activities that result in the use of large amounts of fuel, water, or energy or use these in a wasteful manner.

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[117] California Legislative Information, 2018, SB-100 California Renewables Portfolio Standard Program: emissions of greenhouse gases.

[118] California Public Utilities Commission, 2020, Renewables Portfolio Standard (RPS) Program.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
19. 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.

a) The proposed project would not substantially degrade or 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 Topic D.3, Cultural Resources and Topic D.4, Tribal Cultural Resources, construction activities associated with the proposed project would result in potentially significant impacts on archeological resources, human remains, and tribal cultural resources. However, these impacts would be mitigated to less than significant levels with implementation of Mitigation Measure M-CR-1, Archeological Testing.

As discussed in Topic D.7, Air Quality, the proposed project would result in potentially significant impacts related to health risk. However, implementation of Mitigation Measure M-AQ-1, Clean Off-Road Construction Equipment, would ensure that health risk impacts related to air pollutant emissions would be less than significant both individually and cumulatively and would not result in adverse health effects to people living and working in the area.

b) The proposed project, in combination with cumulative projects, as described in Section B, Project Setting, of this initial study, would not result in significant cumulative impacts on land use and planning, population and housing, cultural resources, tribal cultural resources, transportation, noise, air quality, GHG emissions,

wind, shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, hazards and hazardous materials, and energy resources with implementation of identified mitigation, if required. Therefore, the proposed project would not have impacts that are individually limited, but cumulatively considerable.

c) Potential adverse effects on human beings have been considered as a part of the analysis of individual environmental topics in this initial study. As discussed above, the proposed project is anticipated to have less-than-significant impacts on most of the environmental topics discussed. However, the proposed project's potential significant impacts associated with noise and air quality could adversely affect human beings.

As described in Section D.7, Air Quality, p.48, the proposed project would result in a potentially significant impact related to health risk. This impact would be less than significant with implementation of Mitigation Measure M-AQ-1, Clean Off-Road Construction Equipment. Therefore, the proposed project would not cause substantial adverse effects on human beings, either directly or indirectly, with the implementation of Mitigation Measure M-AQ-1.

E. 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.

DATE December 10, 2025



Lisa Gibson
Environmental Review Officer

F. Initial Study Preparers

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