



SAN FRANCISCO PLANNING DEPARTMENT

Final Negative Declaration

PMND Date: July 24, 2013
Case No.: 2013.0360E
Project Title: Health Care Services Master Plan
Block/Lot: Citywide
Project Sponsors: San Francisco Planning Department
Claudia Flores, (415) 558-6473
San Francisco Department of Public Health
Colleen Chawla, (415) 554-2769
Lead Agency: San Francisco Planning Department
Staff Contact: Don Lewis, (415) 575-9095, don.lewis@sfgov.org

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PROJECT DESCRIPTION:

The project sponsors, the San Francisco Planning Department (Planning) and the San Francisco Department of Public Health (DPH), propose the Health Care Services Master Plan (HCSMP) which is mandated by San Francisco Ordinance No. 300-10. The HCSMP is intended to (i.) identify the current and projected needs for, and general city areas or locations of, health care services within San Francisco, and (ii.) set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The HCSMP is the product of a 41-member HCSMP task force, which engaged the broader community and set forth a series of recommendations for the consideration of DPH and Planning. Implementation of the HCSMP would inform decision-makers about where certain new and expanded health services would be located, would help the local public health system better plan and tailor health programs to community needs, would engage policymakers and community members in discussions of health, and would improve population health. As a policy document no specific development projects are proposed.

FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached. Mitigation measures were not required for this project to avoid potentially significant effects.

In the independent judgment of the Planning Department, there is no substantial evidence that the project could have a significant effect on the environment.



Sarah B. Jones

Environmental Review Officer

September 12, 2013
Date of Adoption of Final
Negative Declaration

cc: Board of Supervisors; Virna Byrd, M.D.F.

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SAN FRANCISCO PLANNING DEPARTMENT

Notice of Availability of and Intent to Adopt a Negative Declaration

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To Whom It May Concern:

This notice is to inform you of the availability of the environmental review document concerning the proposed project as described below. The document is a Preliminary Negative Declaration, containing information about the possible environmental effects of the proposed project. The Preliminary Negative Declaration documents the determination of the Planning Department that the proposed project could not have a significant adverse effect on the environment. Preparation of a Negative Declaration does not indicate a decision by the City to carry out or not to carry out the proposed project.

Project Description: The project sponsors, the San Francisco Planning Department (Planning) and the San Francisco Department of Public Health (DPH), propose the Health Care Services Master Plan (HCSMP) which is mandated by San Francisco Ordinance No. 300-10. The HCSMP is intended to (i.) identify the current and projected needs for, and general city areas or locations of, health care services within San Francisco, and (ii.) set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The HCSMP is the product of a 41-member HCSMP task force, which engaged the broader community and set forth a series of recommendations for the consideration of DPH and Planning. Implementation of the HCSMP would inform decision-makers about where certain new and expanded health services would be located, would help the local public health system better plan and tailor health programs to community needs, would engage policymakers and community members in discussions of health, and would improve population health. As a policy document no specific development projects are proposed.

If you would like a copy of the Preliminary Negative Declaration or have questions concerning environmental review of the proposed project, contact the Planning Department staff contact listed above. The PND is available to view or download from the Planning Department's Negative Declarations web page (<http://tinyurl.com/sfceqadocs>). Paper copies are also available at the Planning Information Center (PIC) counter on the ground floor of 1660 Mission Street, San Francisco.

Within 30 calendar days following publication of the Preliminary Negative Declaration (i.e., by close of business on **August 23, 2013**), any person may:

- 1) Review the Preliminary Negative Declaration as an informational item and take no action.
- 2) Make recommendations for amending the text of the document. The text of the Preliminary Negative Declaration may be amended to clarify or correct statements and/or expanded to include additional relevant issues or cover issues in greater depth. One may recommend amending the text without the appeal described below. -OR-
- 3) 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 check for \$521 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. Send the appeal letter to the Planning Department, Attention: Sarah B. Jones, 1650 Mission Street, Suite 400, San Francisco, CA 94103. **The letter must be accompanied by a check in the amount of \$521.00 payable to the San Francisco Planning Department, and must be received by 5:00 p.m. on August 23, 2013.** The appeal letter and check may also be presented in person at the Planning Information Counter on the first floor at 1660 Mission Street, San Francisco.

In the absence of an appeal, the Negative Declaration shall be made final, subject to necessary modifications, after 30 days from the date of publication of the Preliminary Negative Declaration.

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.



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Negative Declaration

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cc: Board of Supervisors; Virna Byrd, M.D.F.

Preliminary Negative Declaration
July 24, 2013

CASE NO. 2013.0360E
Health Care Services Master Plan

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**INITIAL STUDY
HEALTH CARE SERVICES MASTER PLAN
PLANNING DEPARTMENT CASE NO. 2013.0360E**

PROJECT DESCRIPTION

Background

Mandated by San Francisco Ordinance No. 300-10, the Health Care Services Master Plan (HCSMP) is intended to:

- Identify the current and projected needs for, and general city areas or locations of, health care services within San Francisco; and
- Set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations.

Ordinance No. 300-10 was sponsored by Supervisor David Campos and took effect January 2, 2011. The Ordinance requires that the San Francisco Department of Public Health (DPH) and the Planning Department (Planning) prepare a Plan that includes the following specific components and be updated every three years:

- **Health System Trends Assessment:** to analyze trends in health care services with respect to the City, including disease and population health status, governmental policy, disaster planning, clinical and communications technology, reimbursement and funding, organization and delivery of services, workforce, and community obligations of providers;
- **Capacity Assessment:** to quantify the current and projected capacities of existing medical institutions in San Francisco, including emergency services, hospital services, primary and specialty care, behavioral health, and long-term care;
- **Land Use Assessment:** to assess the supply, need and demand for Medical Uses in the different neighborhoods of the City;
- **Gap Assessment:** to identify medical service gaps across the City and medically underserved areas for particular services;
- **Historical Role Assessment:** to take into consideration the historical role played, if any, by medical uses in the City to provide medical services to historically underserved groups; and
- **Recommendations:** to promote through policy recommendations an equitable and efficient distribution of healthcare services in the City.

This Initial Study is a review and evaluation of the proposed HCSMP which is a policy document that includes program-level concepts for improvement of San Francisco's health system. The HCSMP does not identify or include any site-specific projects for the City, and, as such, no

specific development projects are analyzed here. The HCSMP will be citywide in scope and will not focus on any particular parcel or site in the City. DPH and Planning are joint project sponsors of the HCSMP, on behalf of the City and County of San Francisco.¹ If fully realized, the HCSMP would confer many benefits to San Francisco. For example, the Plan would: inform decisions about where certain new and expanded health services would be located; help the local public health system better plan and tailor health programs to community needs; engage policymakers and community members in discussions of health; and improve population health.

To guide the Plan's development, DPH and Planning convened a 41-member HCSMP Task Force (Task Force), an advisory body charged with engaging the broader community and setting forth a series of recommendations for DPH and Planning consideration. The Task Force met a total of ten times from July 2011 through May 2012, including four meetings in the following selected neighborhood areas because they house resident populations with higher burdens of disease and health disparities:

- Bernal Heights/Mission/Excelsior
- Chinatown/Tenderloin/SoMa/Civic Center
- Western Addition/Richmond/Sunset
- Bayview-Hunters Point/Visitation Valley

All Task Force meetings were open to the public and allowed time for public comment and community dialogue. More than 100 residents attended Task Force meetings, which informed the Task Force's recommendations to DPH and Planning; the Task Force released its final report, including proposed recommendations, in June 2012.² In tandem with Task Force proceedings, DPH retained Harder+Company Community Research to collect data needed to inform the HCSMP. Data collection took two forms:

- Qualitative data from focus groups representing some of San Francisco's more vulnerable residents (transgender adults, monolingual Spanish speakers, seniors and adults with disabilities, Sunset/Richmond residents, Excelsior residents, and teens).
- Quantitative data collection along more than 150 indicators falling into 10 categories: demographic characteristics; socioeconomic characteristics; health resource availability; quality of life; behavioral risk factors; environmental health indicators; social and mental health; maternal and child health; death, illness, and injury; and communicable disease. In addition to informing the final HCSMP, these data also contributed to Task Force meetings and community dialogue.

¹ The Plan also involved collaboration with other City agencies and non-public community stakeholders. These agencies, however, are not considered project sponsors.

² The Task Force's final report is available at <http://www.sfdph.org/dph/comupg/knowledge/HCSMP/default.aspx#report>. Accessed on June 17, 2013.

A complement to the formal meeting and data collection processes, input from other City and County stakeholders – including the San Francisco Mayor’s Office and San Francisco Health and Planning Commissions, among others – further informed the HCSMP’s development.

Objectives

The overall objective of the Plan is “To achieve and maintain an equitable distribution of health care facilities in San Francisco with a focus on access – and with particular emphasis on the city/county’s vulnerable populations – so that all residents have access to the services they need to optimize their health and wellbeing.” DPH and Planning have developed a set of recommendations to realize the above vision.

HCSMP RECOMMENDATIONS AND GUIDELINES

Pursuant to Ordinance No. 300-10, the “Health Care Services Master Plan will provide the Health Commission, Planning Commission and Board of Supervisors with information and public policy recommendations to guide their decisions to promote the City’s land use and policy goals developed in such Plan, such as distribution and access to health care services. As such, the following HCSMP recommendations serve to guide land use decisions, inform the siting and scope of health care facilities and services, and reach beyond bricks and mortar to acknowledge that health and wellness result from the integration of services, community partnerships, and neighborhood characteristics.

HCSMP recommendations, intended to provide a dynamic and inspiring roadmap for bettering health and health services, focus on improving access to care, particularly for San Francisco’s vulnerable populations, including low-income areas and geographic areas with high rates of health disparities (e.g., Bayview-Hunters Point, Tenderloin, Western Addition, Excelsior). Please note that the recommendations frame access broadly to include not only geographic access, but also aspects of connectivity, such as transit access and cultural and linguistic competence. A summary of HCSMP recommendations as they align with San Francisco’s Community Health Priorities (explained on the following page) appears below. Detailed explanation of accompanying HCSMP guidelines appears in the pages that follow.

Table 1. Summary of San Francisco’s Community Health Priorities and HCSMP Recommendations (HCSMP Exhibit 83)

HCSMP RECOMMENDATIONS	
Health Priority 1: Ensure Safe and Healthy Living Environments	
1.1	Address identified social and environmental factors that impede and prevent access to optimal care, including but not limited to violence and safety issues, transportation barriers, environmental hazards, and other built environment issues.
Health Priority 2: Increase Healthy Eating and Physical Activity	
2.1	Support “healthy” urban growth.
Health Priority 3: Increase Access to High Quality Health Care and Services	
3.1	Increase access to appropriate care for San Francisco’s vulnerable populations.
3.2	Promote new, innovative, or integrative models of care for health care delivery – such as the integration of behavioral health and medical services – that improves access for vulnerable

	populations.
3.3	Ensure that San Francisco has a sufficient capacity of long-term care options for its growing senior population and for persons with disabilities to support their ability to live independently in the community.
3.4	Ensure that health care and support service providers have the cultural, linguistic, and physical capacity to meet the needs of San Francisco's diverse population.
3.5	Ensure that San Francisco residents – particularly those without regular car access – have available a range of appropriate transportation options (e.g., public transportation, shuttle services, bike lanes, etc.) that enable them to reach their health care destinations safely, affordably, and in a timely manner.
3.6	Ensure collaboration between San Francisco's existing health and social services networks and the community to maximize service effectiveness and cost-effectiveness.
3.7	Facilitate sustainable health information technology systems that are interoperable, consumer-friendly, and that increase access to high-quality health care and wellness services.
3.8	Improve local health data collection and dissemination efforts.
3.9	Promote the development of cost-effective health care delivery models that address patient needs.

HCSMP Recommendations Framework

Alignment with Community Health Improvement Plan (CHIP)

The HCSMP recommendations framework mirrors the priorities of San Francisco's citywide Community Health Improvement Plan (CHIP) finalized in December 2012 and adds HCSMP-specific recommendations and guidelines in response to Ordinance No. 300-10. The CHIP is an action-oriented, three- to five-year plan outlining three health priorities for San Francisco and provides guidance on how these priorities will be addressed; the work of the HCSMP Task Force heavily informed the CHIP's development as illustrated below.³

CHIP Vision and Values

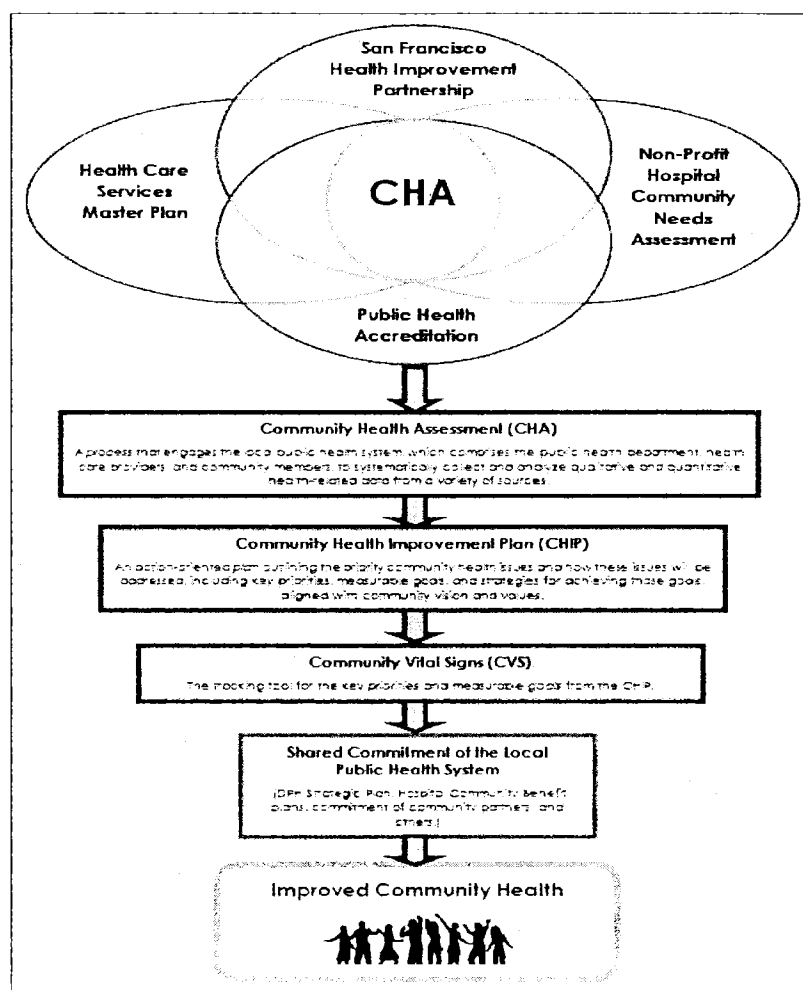
To support the CHIP's development, San Francisco developed a health vision and values with input from community residents and other members of the broader local public health system, including members of the HCSMP Task Force. The resulting values appear below and serve as a guide for the HCSMP recommendations framework. All values – particularly that of health equity – mirror the HCSMP development process, echo the comments made in HCSMP Task Force meetings and focus groups, and reflect findings from HCSMP quantitative data.

- To facilitate the alignment of San Francisco's priorities, resources, and actions to improve health and wellbeing.
 - Engaging communities and health system partners to identify shared priorities and develop effective partnerships.
 - Harnessing the collective impact of individuals and organizations working together in coordination.

³ For more information on the CHIP, including access to the full plan as well as a description of key partners and process, can be located at <http://www.cdph.ca.gov/data/informatics/Documents/SF%20CHIP.pdf>. Accessed July 10, 2013.

- To promote community connections that support health and wellbeing.
 - Getting to know each other and looking out for one another.
 - Increasing communication and collaboration among individuals and organizations within communities.
- To ensure that health equity is addressed throughout program planning and service delivery.
 - Reducing disparities in health access and health outcomes for San Francisco's diverse communities.
 - Partnering with those most affected by health disparities to create innovative and impactful health actions.

Figure 1. San Francisco's Community Health Improvement Process (HCSMP Exhibit 84)



San Francisco's Health Priorities

San Francisco's CHIP highlights three health priorities for action:

- Ensure Safe and Healthy Living Environments
- Increase Healthy Eating and Physical Activity
- Increase Access to High Quality Health Care and Services

HCSMP recommendations and guidelines alongside the CHIP priority with which they best align are presented below. As stated previously, the CHIP's foundational values, priorities, and goals inform the HCSMP recommendation framework; however, the guidelines presented alongside each HCSMP recommendation are specific solely to the HCSMP.

HCSMP Recommendations and Guidelines by San Francisco Health Priority

HCSMP Consistency Determination and Guidelines

Upon the Board of Supervisors' adoption of the HCSMP, the Planning Department must determine, through a referral and consultation process with SFDPH, whether certain medical use projects are in compliance with the HCSMP by making a "Consistency Determination." Such medical use projects, defined in Appendices A and B of this HCSMP, must meet one of the following size threshold guidelines to trigger the need for an HCSMP Consistency Determination:

- Any of change of use from a non-medical use (e.g., industrial) to a medical use that would occupy 10,000 gross square feet or more.
- Any expansion of an existing medical use by 5,000 gross square feet or more.

To assist with the Consistency Determination process, the HCSMP Task Force (Recommendation 10 in the Final Report of the HCSMP Task Force) encouraged SFDPH and the Planning Department to explore an incentive-based system that would encourage the development of needed health care infrastructure and would facilitate projects that address HCSMP recommendations and guidelines without creating unintended negative land use consequences (e.g., housing displacement). This HCSMP employs the Task Force's recommended incentive framework. Please see the following table for the possible outcomes of the Consistency Determination process:

Table 2. Possible HCSMP Consistency Determination Outcomes (HCSMP Exhibit 85)

Consistent and Highly Recommended for Addressing a Critical Need	Qualified medical use projects that meet one or more of the guidelines identified as “Consistent and Highly Recommended for Addressing a Critical Need” by providing services or serving a target population in a manner that specifically addresses one or more critical needs. Projects that meet this designation may be favorably considered for expedited review, facilitating and incentivizing them, depending on the projects’ benefits and per the city’s recommendation.
Consistent	Those qualified medical use projects that positively impact health or health care access and address one or more of the HCSMP Recommendations and/or Guidelines not identified as “Consistent and Highly Recommended for Addressing a Critical Need.”
Inconsistent	Any otherwise qualified medical use project that would adversely impact the health care delivery system or health care access or that address none of the HCSMP Recommendations or Guidelines.

HCSMP recommendations and corresponding guidelines appear below; these recommendations and guidelines align with the recommendations of the HCSMP Task Force. Guidelines associated with projects deemed “Consistent and Highly Recommended for Addressing a Critical Need” are designated with an “X” in the tables that follow. SFDPH and Planning assigned this designation to guidelines that address the needs of San Francisco subpopulations (e.g., by race/ethnicity, income, geography) facing high rates of health disparities as indicated by HCSMP quantitative and qualitative data.

Health Priority 1: Ensure Safe and Healthy Living Environments

Despite being one of the wealthiest and most socially progressive cities in the country, not everyone in San Francisco has a safe and healthy place to live. Some neighborhoods in San Francisco, for example, have great access to parks, public transit, grocery stores, and other resources that benefit health and wellness. Other neighborhoods – often poor communities of color – are closer to fast food and alcohol outlets, freeways, industrial pollutants, and other factors that contribute to high rates of disease, death, injury, and violence. As such, San Francisco’s CHIP identifies three goals designed to ensure that all San Franciscans have a safe and healthy place to live:

- Improve safety and crime prevention.
- Reduce exposure to environmental hazards.
- Foster safe, green, “active” public spaces.

The HCSMP recommendations and guidelines that follow align with CHIP Priority 1, “Ensure Safe and Healthy Living Environments.”

HCSMP Recommendation 1.1: Address identified social and environmental factors that impede and prevent access to optimal care, including but not limited to violence and safety issues, transportation barriers, environmental hazards, and other built environment issues.

Critical Need	HCSMP Guideline
	Guideline 1.1.1: Advance an actionable “Health in All Policies” (HiAP) policy for the City.
	Guideline 1.1.2: Advance health promotion, disease prevention, and overall community wellness (e.g., publicly accessible open space, gyms that provide and facilitate access to underserved populations, exercise areas with equipment and classes/wellness programs that are included as part of development proposals).
	Guideline 1.1.3: Establish “health safety zones” (i.e., areas surrounding facilities that deter violence and improve feelings of safety, health and, wellbeing through streetscaping or other means).
	Guideline 1.1.4: Continue to support the expansion of permanent supportive housing and other affordable, safe housing options that have robust connections to health care facilities and services and to wellness opportunities.
	Guideline 1.1.5: Advance the efforts of the Mayor’s Office of Violence Prevention Services, including recommendations of San Francisco’s current and future Violence Prevention Plan.

Health Priority 2: Increase Healthy Eating and Physical Activity

Science links health conditions such as heart disease, diabetes, and cancer to daily practices like eating a healthy, balanced diet and getting regular exercise. However, the healthy choice is not always the “easy” choice – particularly for San Francisco’s more vulnerable residents. Socioeconomic factors – such as whether people can afford to buy nutritious foods and safely engage in exercise in their neighborhoods – and environmental factors – such as whether healthy food options are locally available – impact what individuals eat as well as their activity practices. As such, San Francisco’s CHIP identifies three goals designed to ensure that all San Franciscans have access to healthy foods and opportunities for physical activity:

- Increase physical activity.
- Increase healthy eating.
- Increase the number of residents who maintain a healthy weight.

The HCSMP recommendation and guidelines that follow align with CHIP Priority 2, “Increase Healthy Eating and Physical Activity.”

HCSMP Recommendation 2.1: Support “healthy” urban growth.	
Critical Need	HCSMP Guideline
	Guideline 2.1.1: Support the expansion of networks of open spaces, small urban agriculture, and physical recreation facilities, including the network of safe walking and biking facilities.
	Guideline 2.1.2: Review the impact of large-scale residential and mixed-use development projects – and/or expected areas of new growth – on the potential impact on neighborhood residents’ future health care needs and, when feasible, such projects should address service connectivity. Projects serving seniors, persons with disabilities, or other populations with limited mobility options, for example, should employ a range of transportation demand management strategies (e.g., shuttle service, gurney service) to address the project’s impact and utility for the community.
	Guideline 2.1.3: Encourage residential and mixed-use projects to incorporate healthy design – e.g. design encouraging walking and safe pedestrian environments.

Health Priority 3: Increase Access to High Quality Health Care and Services

As the HCSMP highlights, access to comprehensive, high quality health care and other services is essential in preventing illness, promoting wellness, and fostering vibrant communities. While San Francisco often outperforms the State and other California counties in terms of health care resources like primary care doctors, availability does not always equal accessibility; many of San Francisco’s more vulnerable residents – ranging from low-income persons to non-native English speakers seeking culturally competent care in their primary language – struggle to get the services they need. As such, San Francisco’s CHIP identifies four goals designed to ensure that all San Franciscans have access to the health care and other services that they need to be healthy and well:

- Improve integration and coordination of services across the continuum of care.
- Increase the connection of individuals to the health services they need.
- Ensure that services that are culturally and linguistically appropriate.
- Ensure that San Franciscans have access to a health care home.

The HCSMP recommendations and guidelines that follow align with CHIP Priority 3, “Increase Access to High Quality Health Care and Services.”

HCSMP Recommendation 3.1: Increase access to appropriate care for San Francisco's vulnerable populations.	
Critical Need	HCSMP Guideline
X	Guideline 3.1.1: Increase the availability and accessibility of primary care in low-income areas (i.e., areas in which residents are above the San Francisco average in terms of individuals living below 200% of the Census Poverty Threshold) and areas with documented high rates of health disparities (e.g., areas in which residents face the highest rates of morbidity or premature mortality).
X	Guideline 3.1.2: Increase the availability and accessibility of primary care among vulnerable subpopulations including but not limited to Medi-Cal beneficiaries, uninsured residents, limited English speakers, and populations with documented high rates of health disparities.
X	Guideline 3.1.3: Increase the availability and accessibility of prenatal care within neighborhoods with documented high rates of related health disparities.
X	Guideline 3.1.4: Increase the availability and accessibility of prenatal care within subpopulations with documented high rates of related health disparities including but not limited to Black/African American residents.
X	Guideline 3.1.5: Increase the availability and accessibility of dental care in low-income areas (i.e., areas in which residents are above the San Francisco average in terms of individuals living below 200% of the Census Poverty Threshold) and areas with documented high rates of health disparities (e.g., areas in which residents face the highest rates of morbidity or premature mortality).
X	Guideline 3.1.6: Increase the availability and accessibility of dental care among vulnerable subpopulations including but not limited to Medi-Cal beneficiaries, uninsured residents, limited English speakers, and populations with documented high rates of health disparities.
	Guideline 3.1.7: Complete the rezoning of the Bayview Health Node, as envisioned by community residents in the adopted Bayview Redevelopment Plan. ⁴

⁴ This document can be located at <http://www.sfredevelopment.org/index.aspx?page=53>. Accessed July 10, 2013.

HCSMP Recommendation 3.1: Increase access to appropriate care for San Francisco's vulnerable populations.	
Critical Need	HCSMP Guideline
X	Guideline 3.1.8: Increase the supply of providers serving low-income and uninsured populations, which may include but is not limited to supporting projects that can demonstrate through metrics that they have served and/or plan to serve a significant proportion of existing/new Medi-Cal and/or uninsured patients, particularly in underserved neighborhoods.
	Guideline 3.1.9: Advocate for the extension of the Medicaid primary care physician reimbursement rate established under Health Reform beyond 2014.
X	Guideline 3.1.10: Promote projects that demonstrate the ability and commitment to deliver and facilitate access to specialty care for underserved populations (e.g., through transportation assistance, mobile services, and/or other innovative mechanisms).
	Guideline 3.1.11: Support innovative education and outreach efforts that: (i.) Target youth and other hard-to-reach populations, such as homeless people and those with behavioral health problems that inhibit them from seeking medical care and other health services, as well as "invisible" populations that are often overlooked due to their legal status; and (ii.) Help low-income, publicly insured, and/or uninsured persons identify health care facilities where they may access care.
	Guideline 3.1.12: Promote support services (e.g., escorting patients to medical appointments, using case managers to help patients navigate the health care system) for patients likely to have difficulty accessing or understanding health care services (e.g., multiply diagnosed or homeless persons).
	Guideline 3.1.13: Support clinics and support services that offer non-traditional facility hours to accommodate patients who work during traditional business hours.
	Guideline 3.1.14: Preserve the Healthy San Francisco program.
	Guideline 3.1.15: Support mobile enrollment efforts to expand opportunities for people to enroll in health insurance or other health care programs.

HCSMP Recommendation 3.2: Promote new, innovative, or integrative models of care for health care delivery – such as the integration of behavioral health and medical services – that improves access for vulnerable populations.

Critical Need	HCSMP Guideline
	Guideline 3.2.1: For the severely mentally ill, research the feasibility of implementing a patient-centered medical home model in which a mental health care provider leads an integrated team of service providers, including primary care practitioners.
	Guideline 3.2.2: Research the connection between specialty mental health services and Medi-Cal managed care for Medi-Cal beneficiaries.
X	Guideline 3.2.3: Increase the availability of behavioral health and trauma-related services – including school-based services – in neighborhoods with documented high rates of violence.

HCSMP Recommendation 3.3: Ensure that San Francisco has a sufficient capacity of long-term care options for its growing senior population and for persons with disabilities to support their ability to live independently in the community.

Critical Need	HCSMP Guideline
X	Guideline 3.3.1: Support affordable and supportive housing options for seniors and persons with disabilities, enabling them to live independently in the community.
X	Guideline 3.3.2: Work in collaboration with the Department of Aging and Adult Services – and in alignment with the Long-Term Care Integration Plan – to promote a continuum of community-based long-term supports and services, such as home care to assist with activities of daily living, home-delivered meals, and day centers. Such services should address issues of isolation as well as seniors' basic daily needs.
	Guideline 3.3.3: Advocate for California to expand community-based Medi-Cal long-term care services, including through the Home- and Community-Based Services 1915(i) state plan option.

HCSMP Recommendation 3.4: Ensure that health care and support service providers have the cultural, linguistic, and physical capacity to meet the needs of San Francisco's diverse population.

Critical Need	HCSMP Guideline
	Guideline 3.4.1: Ensure that electronic health records capture key patient demographic data, consistent with patient privacy preferences, that facilitate the provision of culturally and linguistically competent care.

HCSMP Recommendation 3.4: Ensure that health care and support service providers have the cultural, linguistic, and physical capacity to meet the needs of San Francisco's diverse population.

Critical Need	HCSMP Guideline
X	<u>Guideline 3.4.2:</u> Support workforce development and diversity efforts to develop a health care and home-based services workforce that reflects community characteristics (e.g., race/ethnicity, cultural and linguistic background, etc.), which is expected to increase provider supply and patient satisfaction in underserved areas.
	<u>Guideline 3.4.3:</u> Encourage the assessment of patients' health literacy and cultural/linguistic needs, so providers can better tailor care to each patient's needs.

HCSMP Recommendation 3.5: Ensure that San Francisco residents – particularly those without regular car access – have available a range of appropriate transportation options (e.g., public transportation, shuttle services, bike lanes, etc.) that enable them to reach their health care destinations safely, affordably, and in a timely manner.

Critical Need	HCSMP Guideline
	<u>Guideline 3.5.1:</u> Support the recommendations of the Municipal Transportation Agency's (MTA) Transit Effectiveness Project, which is expected to positively impact passenger travel times on high ridership routes, including those that service San Francisco's major health care facilities.
	<u>Guideline 3.5.2:</u> Ensure that the MTA continues to consider the needs of seniors and persons with disabilities in its transportation planning efforts.
	<u>Guideline 3.5.3:</u> As part of transit demand management efforts for patients, develop safe health care transit options beyond the public transportation system (e.g., bike storage, health care facility shuttle service, etc.) to increase health care access for those without regular car access.
X	<u>Guideline 3.5.4:</u> Provide transportation options (e.g., taxi vouchers, shuttles, other innovative transportation options, etc.) from low-income areas and areas with documented high rates of health disparities – particularly those with transportation access barriers – to health care facilities.
	<u>Guideline 3.5.5:</u> Support mobility training programs for older adults to help them retain independence, access to health care, and other opportunities, especially important as San Francisco's aging population grows.
	<u>Guideline 3.5.6:</u> Ensure that special consideration is given to how the consolidation or retention of transit stops could impact access to health care services from sensitive uses such as housing for seniors and persons with

HCSMP Recommendation 3.5: Ensure that San Francisco residents – particularly those without regular car access – have available a range of appropriate transportation options (e.g., public transportation, shuttle services, bike lanes, etc.) that enable them to reach their health care destinations safely, affordably, and in a timely manner.	
Critical Need	HCSMP Guideline
	disabilities who may regularly need health care services.
	<u>Guideline 3.5.7:</u> Promote ongoing collaboration with MTA and San Francisco County Transportation Authority staff to consider pedestrian safety near health care facilities as well as how safety may be impacted by ongoing transportation planning and projects.
	<u>Guideline 3.5.8:</u> Increase awareness of transportation options to health care facilities during facility hours. This may include but not be limited to providing relevant bus information in providers' offices.

HCSMP Recommendation 3.6: Ensure collaboration between San Francisco's existing health and social services networks and the community to maximize service effectiveness and cost-effectiveness.	
Critical Need	HCSMP Guideline
	<u>Guideline 3.6.1:</u> Support collaborations between medical service providers and existing community-based organizations with expertise in serving San Francisco's diverse populations.
	<u>Guideline 3.6.2:</u> Support inter-health system collaboration (e.g., via provider consultation hotlines, systems support for electronic health records adoption and implementation) that offers potential for improving care access, the patient experience, and health outcomes, and leverage the expertise of San Francisco's diverse providers.
	<u>Guideline 3.6.3:</u> Support partnerships between medical service providers and entities not specifically focused on health or social services (e.g., schools, private business, faith community, etc.) to leverage expertise and resources and expand access to health services and promote wellness.
	<u>Guideline 3.6.4:</u> Support collaboration between San Francisco providers and the United Way to ensure that the 2-1-1 system reflects information on all clinics and services.
	<u>Guideline 3.6.5:</u> Showcase collaboration outcomes to illustrate the potential impact of community partnerships.

HCSMP Recommendation 3.7: Facilitate sustainable health information technology systems that are interoperable, consumer-friendly, and that increase access to high-quality health care and wellness services.

Critical Need	HCSMP Guideline
	<u>Guideline 3.7.1:</u> Promote health care provider participation in HealthShare Bay Area, a health information exchange that will provide a secure, controlled, and interoperable method for exchanging and aggregating patient health information.
	<u>Guideline 3.7.2:</u> Support technology-based solutions that expand access to health services, such as telehealth (e.g., video medical interpretation, remote health monitoring, etc.) and coverage of such by health insurance. Such technology must be provided in a culturally and linguistically competent way, tailored to the needs of the target population, and accessible to San Francisco's vulnerable populations.
	<u>Guideline 3.7.3:</u> Integrate support service information (e.g., receipt and source of case management services) in electronic health records to paint a more complete picture of each patient's health.

HCSMP Recommendation 3.8: Improve local health data collection and dissemination efforts.

Critical Need	HCSMP Guideline
	<u>Guideline 3.8.1:</u> Improve collection, coordination of collection, availability, and understandability of data on San Francisco's existing health care resources (e.g., the physical location of health care providers by type and population served).
	<u>Guideline 3.8.2:</u> Gather and disseminate more data about the connection between safety and public health.
	<u>Guideline 3.8.3:</u> Disseminate relevant health status data to health care providers so they can better affect key indicators of population health through their institutional and clinical decisions.

HCSMP Recommendation 3.9: Promote the development of cost-effective health care delivery models that address patient needs.	
Critical Need	HCSMP Guideline
	Guideline 3.9.1: Use nurse practitioners and physician assistants to the full extent of their training.
	Guideline 3.9.2: Increase flexibility between primary care and specialty care (e.g., specialty mental health) provider roles. Such flexibility might include but not be limited to: (i.) Allowing specialists with a history of treating patients with certain conditions to serve as those patients' primary care provider; (ii.) Better equipping primary care providers to manage chronic conditions to maximize the appropriate use of specialists; and/or (iii.) Creating a health care delivery framework that allows for a shared scope of responsibilities between primary care providers and specialists that best supports the patient care experience.
	Guideline 3.9.3: Advance the patient-centered medical home model for all San Franciscans.

HCSMP Consistency Determination Incentives

Preferred projects must meet a demonstrated, critical health care need as captured in HCSMP Recommendations and Guidelines. In addition, preferred projects must engage the community via a transparent and inclusive process prior to filing for approvals from the Planning Department. The Planning Department, in conjunction with DPH, will have the ability to determine appropriate incentives at the time a project is deemed "Consistent and Highly Recommended for Addressing a Critical Need." Incentives may vary by project but will be based on the following factors:

- The degree to which a project meets one or more of the HCSMP Guidelines identified as addressing a critical need; and
- The types of incentives that would most benefit the particular project.

The Planning Department will consult with DPH on each project's consistency determination.

B. ENVIRONMENTAL SETTING

San Francisco is a consolidated city and county. As illustrated in **Figure 2**, the City and County of San Francisco (hereafter “the City”) is located on the tip of the San Francisco Peninsula with the Golden Gate Strait to the north, San Francisco Bay to the east, San Mateo County to the south, and the Pacific Ocean to the west. The City is one of nine counties adjacent to the San Francisco and San Pablo Bays. Daly City and the City of Brisbane abut San Francisco to the south. The City comprises a land area of approximately 49 square miles.

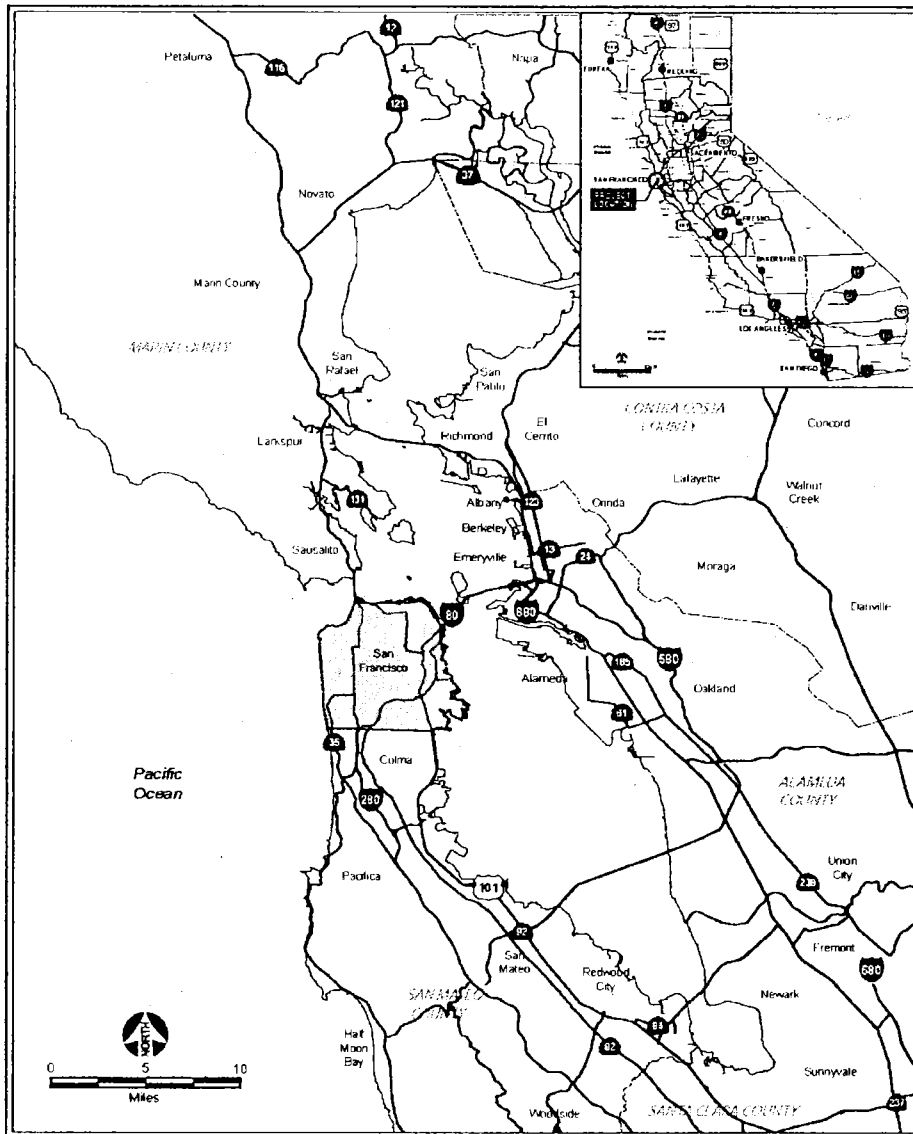


Figure 2: Project Location

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Planning Code and Zoning

The San Francisco Planning Code ("Code"), which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Implementation of the HCSMP would likely require amendments to the San Francisco General Plan and Planning Code in the future when physical development based on the HCSMP recommendations and guidelines is planned or proposed; no specific amendments have been drafted at this time. The HCSMP would not require any variances, special authorizations, or changes to the City zoning maps. As stated previously, the proposed project will be citywide in scope and will not focus on any particular parcel or site in the City. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

General Plan

The San Francisco General Plan – serving as the guideline for the city's long term physical growth and development in areas such as housing, commerce and industry, transportation, and community facilities – is relatively silent when it comes to the amount of development and location of medical institutions in the city. It is for this reason that the need for a more systematic framework was identified and the HCSMP ordinance adopted.

Plans and Policies

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services within San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The City also maintains several policy documents, some of which are discussed below, that address San Francisco health and health care services. As previously mentioned, the HCSMP aligns itself with these policies, and therefore the HCSMP would not conflict with any of these plans or policies.

Community Health Assessment

In coordination with nonprofit hospital and academic partners, DPH engaged in a 14-month community health assessment (CHA) process between July 2011 and August 2012. Serving California's only consolidated city and county (the City and County of San Francisco) – as well as a diverse population of 805,235 residents – DPH and its partners strove to foster a community-driven and transparent CHA aligned with community values. Building on the work of Community Vital Signs, San Francisco's past community health assessment effort conducted in

2010 (discussed below), DPH relied on the Mobilizing for Action Through Planning and Partnerships (MAPP) framework to guide the current CHA. The result was a community-driven process that engaged more than 500 community residents and local public health system partners and was based on the following values:

- To facilitate alignment of San Francisco's priorities, resources, and actions to improve health and well-being.
- To ensure that health equity is addressed throughout program planning and service delivery.
- To promote community connections that support health and well-being.

San Francisco's Community Health Improvement Plan (CHIP)⁵

In coordination with nonprofit hospital and academic partners as well as the broader San Francisco community, DPH built on the work of the CHA effort to create a community health improvement plan (CHIP) for San Francisco. Serving California's only consolidated city and county (CCSF) and a diverse population of 805,235 residents, DPH and its partners endeavored to create a community-driven and transparent CHIP aligned with community values. Building on the past work of Community Vital Signs, DPH relied on the Mobilizing for Action Through Planning and Partnerships (MAPP) framework to guide the current CHIP. The result was a community-driven CHIP development process that engaged more than 160 community residents and local public health system partners to identify the following key health priorities for action:

- Ensure Safe + Healthy Living Environments
- Increase Healthy Eating + Physical Activity
- Increase Access to Quality Health Care + Services

In collaboration with community residents and stakeholders, DPH and its partners developed goals and objectives for each priority as well as related measures and strategies that comprise the current CHIP. The diversity of project leads assigned to identified strategies – including a range of government agencies, public/nonprofit/community collaborations, nonprofit organizations, and other entities – is intended to demonstrate that the current CHIP is a substantial effort to harness the collective effort of San Francisco's communities and local public health system partners to improve population health. DPH and its partners plan to conduct a CHA/CHIP process every three years in alignment with other health improvement initiatives.

Community Vital Signs

Community Vital Signs (CVS) was designed to provide a clear and dynamic path forward in promoting the health priorities of San Francisco. The Community Benefit Partnership has taken steps to: (i.) establish ten priority health goals; (ii.) identify over 30 data indicators to help assess health status; and (iii.) build an agenda for community health improvement. The Partnership identified ten priority health goals for San Francisco by enhancing the four priority areas developed during the 2007 Community Needs Assessment. At a Community Stakeholder meeting on November 13, 2009, the Partnership hosted over 75 participants representing a cross-section of expertise in health and human services. These community stakeholders confirmed the

⁵ <http://www.cdph.ca.gov/data/informatics/Documents/SF%20CHIP.pdf>

relevance of the ten health goals and helped establish ten affinity groups comprised of subject matter experts for each of the ten health goals. The health goals were adopted by the San Francisco Health Commission on February 2, 2010.

These goals, listed below, will be tracked through the CVS on the Health Matters in San Francisco website.⁶

- Increase Access to Quality Medical Care
- Increase Physical Activity and Healthy Eating to Reduce Chronic Disease
- Stop the Spread of Infectious Diseases
- Improve Behavioral Health
- Prevent and Detect Cancer
- Raise Healthy Kids
- Have a Safe and Healthy Place to Live
- Improve Health and Health Care Access for Persons with Disabilities
- Promote Healthy Aging
- Eliminate Health Disparities

CVS is intended to be the newest, most effective platform to provide a clear and dynamic path forward in promoting the health priorities of San Francisco. CVS is a health resource for San Francisco that (i.) evaluates impacts of health interventions; (ii.) assesses health and health care needs; and (iii.) helps to guide health policy through collaboration.

Approvals Required

DPH and Planning presented the HCSMP before separate sessions of the San Francisco Health and Planning Commissions on July 16, 2013 and July 18, 2013 respectively. The HCSMP would be subject to a 30-day public comment period which started on July 11, 2013. Following the public comment period and upon completion of the environmental review, the HCSMP will come before a joint session of the San Francisco Health and Planning Commissions, expected September 2013, with those bodies holding additional hearings, together or separately, as needed. DPH and Planning anticipate that the final HCSMP will come before the San Francisco Board of Supervisors for approval in December 2013/January 2014.

Once the HCSMP gains approval from the Board of Supervisors, Planning will implement the consistency determination review process for all affected projects. Plan recommendations and guidelines would be used by Planning to make land use decisions for medical use projects as defined by San Francisco Ordinance No. 300-10. As previously stated, to trigger a consistency determination against the HCSMP, specified medical use projects must meet one of the following size thresholds: (i.) any change of use to a medical use that occupies 10,000 gross square feet or more, or (ii.) any expansion of an existing medical use by 5,000 gross square feet or more.

The HCSMP would require amendments to the Administrative Code and Regulations of various City Departments. For instance, the HCSMP would likely require amendments to the San Francisco General Plan and Planning Code; specific amendments have not yet been drafted. The

⁶ <http://www.healthmattersinsf.org/index.php?module=htmlpages&func=display&pid=94>. Accessed on June 20, 2013.

HCSMP would, however, not require any variances, special authorizations, or changes to the City zoning maps. An Interdepartmental Memoranda of Understanding (MOU) among various City Departments, regarding Plan implementation and jurisdiction, would also be required.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

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

This Initial Study examines the project to identify potential effects on the environment. All items on the Initial Study Checklist that have been checked "Less than Significant Impact", "No Impact" or "Not Applicable" indicates that, upon evaluation, staff has determined that the HCSMP could not have a significant adverse environmental effect relating to that topic. A discussion is included for those issues checked "Less than Significant Impact" and for most items checked with "No Impact" or "Not Applicable". For all items checked "Not Applicable" or "No Impact" 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 Department's Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Database and maps, published by the California Department of Fish and Game.

On the basis of this study, the HCSMP would not result in adverse physical effects on the environment; all issues are discussed in Section E below. By its nature as a city-wide policy document, the analysis of the effects related to implementation of the HCSMP is cumulative; therefore, checklist responses consider individual and cumulative effects together. Cumulative impacts are also discussed in Topic E-19 Mandatory Findings of Significance in this Initial Study.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
1. LAND USE AND LAND USE PLANNING— Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: Implementation of the HCSMP would not physically divide established communities. (Less than Significant)

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. With implementation of the HCSMP, the City is expected to continue in their established locales and interrelate with their surrounding land uses in the future as they currently do.

The first recommendation of the HCSMP would be to "Address identified social and environmental factors that impede and prevent access to optimal care, including but not limited to violence and safety issues, transportation barriers, environmental hazards, and other built environment issues" (HCSMP Recommendation 1.1). Another recommendation of the HCSMP would be to "Increase access to appropriate care for San Francisco's vulnerable populations" (HCSMP Recommendation 3.1).

Since the purpose of the HCSMP is to promote equitable access to and distribution of health care services, it is not anticipated that the HCSMP recommendations would lead to zoning change proposals that make development on property in the city more restrictive than is currently allowed; rather, zoning change proposals, if any, would ensure that medical uses are allowed, as appropriate, throughout the city. The HCSMP considers the supply and demand for medical uses in San Francisco and the potential effects or land use burdens, including displacement pressures on other neighborhood-serving uses that may occur as a result of locating medical uses in different areas of the city. Implementation of the HCSMP would not physically divide existing communities or neighborhoods, both individually and cumulatively. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact LU-2: The HCSMP would not conflict with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. (No Impact)

The San Francisco General Plan – serving as the guideline for the city’s long term physical growth and development in areas such as housing, commerce and industry, transportation, and community facilities – is relatively silent when it comes to the amount of development and location of medical institutions in the city. It is for this reason that the need for a more systematic framework was identified and the HCSMP ordinance adopted. One of the expressed purposes of the HCSMP is to promote an equitable and efficient distribution of and access to health care services for current and future residents of San Francisco. This could be enabled by facilitating the siting of vital service providers in order to deliver needed services in underserved areas, and by ensuring that underserved areas in the city allow medical uses to locate in those areas through proper zoning designation.

The HCSMP recommendations framework mirrors the priorities of San Francisco’s citywide Community Health Improvement Plan (CHIP), which was finalized in December 2012, and adds HCSMP-specific recommendations and guidelines in response to Ordinance No. 300-10. The CHIP is an action-oriented three- to five-year plan outlining three health priorities for San Francisco and provides guidance on how these priorities will be addressed. One of the core values that arose as part of the CHIP process was the value of alignment – that is, having shared priorities, partnerships, and harnessing collective effort to meet common health-related goals and have the greatest impact on health. To that end, CHIP values, priorities, and goals are incorporated into the HCSMP as part of its recommendations framework.

The HCSMP would not conflict with the General Plan, its Elements, or pertinent sections of the Planning Code or other regulations or programs so as to cause substantial, adverse environmental effects. Moreover, the HCSMP would not conflict with other plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, implementation of the HCSMP would not result in conflicts that would cause substantial adverse physical effects, either individually or cumulatively. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-LU-1: Implementation of the HCSMP, in combination with past, present and reasonably foreseeable future projects in the vicinity of the site, would not have a substantial adverse cumulative impact to land use. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. As discussed above, implementation of the HCSMP would result in less-than-significant land use impacts. Implementation of the HCSMP would not contribute in a cumulatively considerable way to divide an established community or conflict with plans, policies, and regulations. Therefore, the project would not result in any significant cumulative land use impacts.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Aesthetic Character

The visual setting of the City is varied, reflecting the unique visual characteristics of its topography, street grids, public open spaces, built environment and distinct neighborhoods. San Francisco's skyline is characterized by a general pattern of densely clustered high-rise commercial development in the downtown core that tapers off to low-rise development at its periphery. This compact urban form signifies the downtown as the center of commerce and activity and produces a downtown "mound," distinctive in views from the City's numerous hills. Outside of the highly commercial and built-up downtown core, much of the City is characterized by unique residential neighborhoods, which each exhibit their own distinctive visual character. Neighborhoods within the City vary greatly in terms of density, scale, architectural style, and general design pattern.

Views

A "viewshed" refers to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, which are often both characterized by and contrast with urban development in San Francisco. Known for its abundance of natural beauty and panoramic views, San Francisco is surrounded on three sides by water and featured by parks, lakes, and vistas. The Pacific Ocean, San Francisco Bay and their respective shorelines are considered by many to be the City's most lauded natural resources, offering significant opportunities for scenic views. The City's natural hills and ridges also define neighborhoods and provide contrast to the spacious setting provided by the bay and ocean waters.

The City contains many prominent viewsheds. The several roadways approaching and within the City provide views of the cityscape, the Golden Gate and Bay bridges, urban forests such as the Presidio and Golden Gate Park, and important historic or architectural landmarks such as the Palace of Fine Arts, Grace Cathedral, and the Ferry Building. Aside from the waters of the Bay,

easterly views in the City are generally urban in character, with high-rise buildings visible at the Civic Center, and in downtown along Market Street.

The areas of the City within the elevated topography include Twin Peaks, Mt. Sutro, Mt. Davidson, Mt. Olympus, Glen Canyon, Buena Vista, and Forest Hill are typically provided with panoramic views of the City. Persons at the top of these inclines enjoy 360-degree views, which include the Bay, the downtown skyline, the Pacific Ocean, the Golden Gate and Bay bridges, and several other San Francisco landmarks and visual resources. Due to the proximity to the ocean and parks and open spaces, westerly views of the City generally feature more natural areas than those of the east. Low lying areas and valleys, such as Noe Valley, the Castro, Hayes Valley, and Cole Valley benefit from views of surrounding topography, and the hills and ridges themselves are aesthetically pleasing features. Sutro Tower, located southeast of Mt. Sutro, is a dominant part of the skyline in the central part of the City.

Impact AE-1: Implementation of the HCSMP would not have a substantial adverse affect on scenic vistas or damage scenic resources. (Less than Significant)

A review of the HCSMP recommendations and guidelines (see pages 7-15) indicate that none would have the potential to directly alter scenic vistas or damage scenic resources. The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. Therefore, the degree of potential physical change associated with these policies is considered minimal, because implementation of these policies does not directly involve construction and therefore would preserve the continuation of existing visual conditions. Based on the above, the HCSMP would not have a substantial adverse effect on scenic vistas or damage scenic resources, thus this impact is considered less than significant, both individually and cumulatively. Any future projects related to the implementation of the HCSMP policies that include the alteration, demolition, or construction of buildings, would be subject to project-specific environmental review to evaluate potential impacts to aesthetic character.

Impact AE-2: Implementation of the HCSMP would not degrade the City's aesthetic character. (Less than Significant)

A review of the HCSMP recommendations and guidelines indicate that none would have the potential to degrade the City's aesthetic character. The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. These policies would not have predictably negative effects on the visual quality of existing or future development, as there is no clear or substantial correlation between improving health care and adverse changes to building appearances. Any future projects related to the implementation of the HCSMP that include the alteration, demolition, or construction of buildings, would be subject to project-specific environmental review to evaluate potential impacts to aesthetic character. Because the HCSMP's policies would

not be considered to degrade the existing aesthetic character of the City, this impact is considered to be less than significant, both individually and cumulatively.

Impact AE-3: Implementation of the HCSMP would not create new sources of substantial light or glare which would substantially impact other people or properties. (Less than Significant)

City Resolution 9212 prohibits the use of highly reflective or mirrored glass in new construction. New development would be required to comply with this resolution. Therefore, the HCSMP recommendations and guidelines are not expected to result in substantial light and glare impacts on people or properties, and this a less than significant impact.

Impact C-AE-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future development in the vicinity, would not have a substantial adverse cumulative impact on aesthetic resources. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. As stated above, implementation of the HCSMP would result in less-than-significant effects related to aesthetics. Implementation of the HCSMP and would not contribute in a cumulatively considerable way to substantially degrade views, damage scenic resources, degrade the existing visual character of the area, or create new sources of substantial light or glare. For the reasons discussed above, the proposed project's impacts related to aesthetics, both individually and cumulatively, would be less than significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
3. POPULATION AND HOUSING— Would the project:					
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In general, a project would be considered growth-inducing if its implementation would result in a substantial population increase and/or new development that might not occur if the project were not implemented. As of 2012, the U.S. Census indicates that the City and County's total

population is approximately 825,863 persons. The total number of housing units in San Francisco is 378,247.⁷

The Planning Department routinely prepares projections for the purpose of analyzing plans and projects undergoing environmental review. While the assumptions of these data sets may vary depending on the circumstances surrounding a specific project, the Planning Department completed a citywide projection capturing expected citywide growth by 2030 designed to closely match the recently adopted Association of Bay Area Governments (ABAG) Projections 2009 target, which take into account local knowledge of projects currently in various stages of the entitlement and development process, commonly referred to as the development pipeline. Table 3 shows population and housing projections through the horizon year of 2030.

Table 3: Household Population and Jobs Forecast: 2000-2030

	2000	2005	2030	Growth 2000-2030	Growth 2005-2030
Households	329,700	341,478	403,292	73,592	61,814
Household Population	756,976	783,441	916,800	159,824	133,359
Jobs	642,500	533,090	748,100	105,600	195,010

Sources: ABAG, San Francisco Planning Department, 2011.

Impact PH-1: Implementation of the HCSMP would not induce substantial population growth in San Francisco, either directly or indirectly. (Less than Significant)

The HCSMP is a policy document with the goal of improving health care in San Francisco. Implementation of the proposed recommendations and guidelines could ultimately affect population growth, depending on the scope of programs that may be proposed to increase health care. Such impacts would be assessed in separate, detailed environmental review at the time a specific project may be proposed. However, it should be noted that HCSMP Guideline 1.1.4 states the following: "Continue to support the expansion of permanent supportive housing and other affordable, safe housing options that have robust connections to health care facilities and services and to wellness opportunities." In addition, HCSMP Guideline 3.3.1 states "Support affordable and supportive housing options for seniors and persons with disabilities, enabling them to live independently in the community." As shown in Table 3, above, the City and County of San Francisco projects growth in overall households, household population and jobs in the near future. As a policy document, the HCSMP would not directly induce substantial population growth. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment. Therefore, the HCSMP would not impact the City's population growth, either individually or cumulatively.

7 The Census Bureau's Population Estimates Program (PEP) produces July 1 estimates for years after the last published decennial census (2000). Existing data series such as births, deaths, and domestic and international immigration, are used to update the decennial census base counts. PEP estimates are used in federal funding allocations, in setting the levels of national surveys, and in monitoring recent demographic changes. Information from the United States Census Bureau, accessed on June 20, 2013 at: <http://quickfacts.census.gov/qld/states/06/06075.html>

Impact PH-2: Implementation of HCSMP would not displace substantial numbers of people or existing housing units or create demand for additional housing, necessitating the construction of replacement housing. (Less than Significant)

The HCSMP is a policy document with the goal of improving health care in San Francisco. Implementation of the proposed recommendations and guidelines could ultimately affect the existing housing supply and/or displace residents, depending on the scope of programs that may be proposed to increase health care, which could involve converting existing non-medical structures into medical uses. Such impacts would be assessed in separate, detailed environmental review at the time a specific project may be proposed. However, it should be noted that HCSMP Guideline 1.1.4 states the following: "Continue to support the expansion of permanent supportive housing and other affordable, safe housing options that have robust connections to health care facilities and services and to wellness opportunities." In addition, HCSMP Guideline 3.3.1 states "Support affordable and supportive housing options for seniors and persons with disabilities, enabling them to live independently in the community." The HCSMP is a policy document that would neither displace existing housing units nor create demand for additional housing, the construction of which could have potential adverse environmental effects. The HCSMP would also not displace substantial numbers of people. As such, the HCSMP would have less than significant, both individual and cumulative, impacts on population and housing. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-PH-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not have a substantial adverse cumulative impact on population and housing. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. As discussed above, implementation of the HCSMP would result in less-than-significant impacts related to population and housing. In addition, implementation of the HCSMP would not contribute in a cumulatively considerable way that would induce substantial population growth and would not displace substantial numbers of people or existing housing units. For the reasons discussed above, the proposed project's impacts related to population and housing, both individually and cumulatively, would be less than significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
4. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Historic architectural resource impacts are considered to be significant if adoption of the HCSMP would cause a substantial adverse change in the significance of an historical resource (CEQA Section 21084.1). The assessment of potential impacts on “historical resources,” as defined by CEQA Guidelines Section 15064.5, is a two-step analysis. First, a determination is made as to whether a property contains an “historical resource” as defined under CEQA. The second step of the historical resource analysis is to determine whether the project could cause substantial adverse changes to historical resources. A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Thus, this Initial Study evaluates potential impacts of the HCSMP policies to historical resources located within the City.

There are approximately 19,740 identified historic resources located throughout the City and County of San Francisco.⁸ (Source: San Francisco Planning Department, 2011.) A historic resource can be a building, structure, district, object, site, or cultural landscape. These identified resources are listed in or have been found eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historic Resources (CRHR), designated as San Francisco Planning Code Articles 10 and 11 properties, or listed in local adopted registers and surveys (e.g. the *Here Today* survey, adopted as a local register by the Board of Supervisors in 1970). Below is a brief summary of the City’s identified historic resources.

Identified Historic Resources

National and California Register Historic Resources

The National Register of Historic Places (NRHP) is the official list of the Nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Park Service's NRHP is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.

⁸ This number was generated by calculating the number of Category A buildings listed in Parcel Information Database.

Similarly, the California Register of Historical Resources (CRHR) is a comprehensive listing of California's historical resources, including those of local, state, and national significance. The California Register includes resources formally determined eligible for, or listed in, the National Register of Historic Places. There are approximately 240 individual resources listed on the CRHR in San Francisco, approximately 160 of which are also listed on the NRHP. Furthermore, there are approximately 45 historic districts listed on the CRHR, 26 of which are also listed on the NRHP. The districts are listed below and marked (*) if listed on both registers.

- 2nd and Howard Streets*
- Alcatraz*
- Aquatic Park*
- Aronson Building
- Bush Street Cottage Row*
- Central Embarcadero Piers
- Coast Guard San Francisco Depot
- Conservatory Valley
- Fort Funston
- Fort Mason*
- Francis "Lefty" O'Doul Bridge
- Fort Miley Military Reservation*
- Fort Point*
- Golden Gate Park*
- Hayes Valley
- Industrial District, Rincon Point/South Beach
- Jackson Brewing Company*
- Jackson Square/Barbary Coast*
- Laguna Honda Hospital And Rehabilitation Center
- Liberty Street*
- Light Station
- Lower Nob Hill Apartment Hotel*
- Lyon Street
- Market Street Theatre and Loft*
- North Point Park/Marina
- Old Ohio Street Houses
- Panhandle/Avenue Heading To Golden Gate Park
- Piers 26-28: Located at Harrison and Bryant Streets
- Point Lobos Archeological Sites*
- Presidio Of San Francisco*
- Punta Medanos/Batteria Yerba Buena, Fort Mason/Black Point
- Russian Hill, Russian Hill/Vallejo Street*
- Russian Hill/Macondray Lane*
- Russian Hill/Paris Block*
- San Francisco Civic Center*
- San Francisco Port of Embarkation, US Army*
- San Francisco Cable Cars

- San Francisco State Teacher's College*
- San Francisco-Oakland Bay Bridge
- So. Pacific Company Hospital, Mercy Family Plaza*
- Uptown Tenderloin*
- Veterans Affairs Medical Center*
- Southeast Farallon Island
- Yerba Buena Island Lighthouse, Goat Island Lighthouse*
- Yerba Buena Island Senior Officers Quarters*

Article 10 Historic Resources

Adopted by the City in 1967, Article 10 of the Planning Code provides San Francisco the ability to identify, designate and protect landmarks. As of April 2012, there are 262 individual properties designated under Article 10 and twelve (12) historic districts designated under Article 10 (listed below).

Alamo Square: Area generally bound by Golden Gate Avenue to the north, Divisadero Street to the west, Webster Street to the east and Fell Street to the south.

Blackstone Court: Area generally bound by Lombard Street to the north, Franklin Street to the east, Gough Street to the west and Greenwich Street to the south.

Bush Street Cottage Row: Area generally bound by Bush Street to the north, Webster Street to the east, Fillmore Street to the west and Sutter Street to the south.

Civic Center: Area generally bound by Van Ness Avenue to the west, Market Street to the south, Golden Gate Avenue to the north, and Seventh Street to the east.

Dogpatch: Area generally bound by Mariposa Street to the north, Tubbs Street to the south, 3rd Street to the east, and Indiana Street to the west.

Jackson Square: Area generally bound by Broadway to the north, Sansome Street to the east, Washington Street to the south and Columbus Avenue to the west.

Liberty Hill: Area generally bound by Twentieth Street to the north, Mission Street to the east, Dolores Street to the west and Twenty-Second Street to the south.

Market Street Masonry: A discontinuous district composed of eight builds on four blocks that are spatially discrete.

Northeast Waterfront: Area generally bound by Greenwich Street to the north, the Embarcadero to the east, Montgomery Street to the west and Broadway to the south.

South End: Area generally bound by Stillman Street to the north, First Street to the east, Ritch Street to the west and King Street to the south.

Telegraph Hill: Area generally bound by Greenwich Street to the north, Sansome Street to the east, Montgomery Street to the west and Green Street to the south.

Webster Street: Area generally bound by Jackson Street to the north, Buchanan Street to the east, Fillmore Street to the west and Clay Street to the south.

Article 11 Historic Resources

Adopted by the City in 1985, Article 11 of the Planning Code identifies and protects historic buildings in the downtown area based on architectural quality and contribution to the environment. Article 11 identifies both individually significant buildings and buildings that contribute to a district. As of April 2012, there are 251 individually significant buildings designated under Article 11 and six (6) districts designated under Article 11 (listed below).

Commercial-Leidesdorff: Area generally bound by Market Street to the north, Tehama Street to the south, Anthony Street to the east and Annie Street to the west.

Front-California: Area generally bound by Clay Street to the north, Sacramento Street to the south, Sansome Street to the east and Montgomery Street to the west.

Kearny-Belden: Area generally bound by Pine Street to the north, Bush Street to the south, Montgomery Street to the east and Kearny Street to the west.

Kearny-Market-Sutter-Mason: Area generally bound by Sacramento Street to the north, California Street to the south, Battery Street to the east and Front Street to the west.

New Montgomery-Mission-Second Street: Area generally bound by Market Street to the north, Howard Street to the south, Second Street to the east and Annie Street to the west.

Pine-Sansome: Area generally bound by California Street to the north, Bush Street to the south, Sansome Street to the east and Montgomery Street to the west.

Unidentified Historic Resources

In addition to the previously identified historic resources within the City's boundaries, there are an unknown number of properties over 50 years in age that have not yet been evaluated for historical significance. These properties would require further consultation and project-specific environmental review if future projects proposed their alteration or demolition. The majority of buildings fall within this unevaluated category of properties and are identified under the Planning Department's CEQA Review Procedures for Historic Resources and in its Parcel Information Database as "Category B" – properties (Properties Requiring Further Consultation and Review).

Impact CP-1: Implementation of the HCSMP would not have a significant impact on historic architectural resources. (Less than Significant)

The HCSMP is a policy document that consists of identifying the current and projected needs for, and locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The HCSMP does not include policies that may indirectly result in material changes to buildings, structures, objects, and sites. Any future project proposed in the context of the HCSMP would be subject to the Planning Department's CEQA Review Procedures for Historic Resources which would require further consultation and project-specific environmental review. In accordance with the Planning Department's CEQA review policy, any project that involves the major alteration or demolition of a property over 50 years of age is required to undergo environmental review that includes an evaluation of the property's historical significance and, if a resource is present, an analysis of project impacts. Any future projects related to the implementation of the HCSMP policies that

include the alteration, demolition, or construction of buildings would be subject to project-specific environmental review that evaluates potential impacts to historic resources.

In sum, for the reasons stated above, implementation of the HCSMP would not result in adverse impacts to historical resources since they do not recommend the demolition or alteration of historic buildings and do not directly propose material changes to buildings, structures, objects, sites, historic districts and cultural landscapes. As previously stated, any future projects indirectly related to the HCSMP would be subject to project-specific environmental review. As such, the HCSMP recommendations and guidelines are considered to have a less-than-significant effect on historical resources, both individually and cumulatively.

Impact CP-2: Implementation of the HCSMP would not adversely affect legally-significant archeological resources. (Less than Significant)

ARCHEOLOGICAL CONTEXT

San Francisco: The Archeological Record

The City and County of San Francisco has a rich, complex, and an unusually well-preserved archeological record that extends back to nearly 6,000 years before the present (B.P.). Our knowledge of all of the significant historical periods of pre-Modern San Francisco – the Hispanic Period (1776-1846), Yerba Buena Period (1835-1848), the Early and Late Gold Rush Periods (1848-1860), the Victorian Period (1860-1906) – continues to be expanded by the discovery and research of archeological sites associated with these periods.

Archeological resources in San Francisco can be vertically found from as deep as 75 feet below existing grade (CA-SFR-28) to as shallow as at the existing ground surface (Lake Merced Midden). An archeological resource can be as massive in scale as a buried Gold Rush period storehouse (the General Harrison), as complex as representing occupations of several different peoples over a period of 3,000 years (CA-SFR-4), as fragile and disperse as a prehistoric lithic scatter site (CA-SFR-113), or as small as a single artifact (CA-SFR-25). Since human occupation and use has occurred throughout the entire northern San Francisco peninsula extending back to geologic/climatic eras when the bay and ocean shorelines were considerably beyond and lower than their current alignments, the archeological record lies, potentially, throughout the City and beyond existing shorelines.

San Francisco: The Documentation of the Archeological Record

A sizable archeological literature exists for San Francisco supported by a considerable amount of archeological field investigation. Most of this documentation has been more descriptive than analytic in its approach and most field projects have been archeological salvage responses to development proposals rather than research-initiated projects. Until the last two decades, archeologists had tended to focus on a small set of resource types: prehistoric sites, Gold Rush period sites, including buried ships and storehouses, Overseas Chinese sites, and burials from former cemeteries. Since the 1990's as a result of ever increasing archeological discoveries and the adoption of new research approaches by archeologists, a growing awareness of the wide range and complexity of the City's archeological record has improved local cultural resource

management practices by raising professional standards in research and documentation, increased use of regional and comparative site studies approaches, and greater emphasis on the archeological study of population groups that are poorly documented in the written historical record.

San Francisco: The Significance of the Archeological Record

The archeological literature for San Francisco clearly demonstrates that San Francisco's archeological record has significant research value with respect to an unusually broad range of research domains. A small sample of research themes associated with archeological sites in San Francisco includes: paleoenvironmental change; prehistoric settlement patterns; prehistoric social interaction and change; prehistoric cultural chronology; prehistoric resource intensification and adaptive change; shell mounds as constructed landscapes; Mission Dolores water conveyance system; social stratification within the neophyte village; the development of the Gold Rush period waterfront; Gold Rush period storeships; Overseas Chinese fishing camp settlements; Chinese farms; Gold Rush period mining equipment industries; the emergence of the middle class; Victorian values and the concept of nuisance; Victorian values and the rise of charitable institutions; the social role of cemeteries; health and violence in the 19th century; the economics of refuse in the 19th century; small craft boatyards; ethnic and religious/cultural identity; and working class identity.

Significance of the Archeological Record: Special Cases

Archeological research in San Francisco has tended to give special significance to archeological resources associated with the Prehistoric period, the Hispanic Period (1776-1850) and the Yerba Buena Period (1835-1848). Archeological deposits associated with these periods may have legal-significance whether or not they possess, in their own right, research-value because the deposits may have special characteristics that make them, otherwise, legally significant, such as their scarcity (San Francisco prehistoric and Native American archeological sites) or their eligibility for listing in the State or National Register on the basis of their association with a significant historical event (the Franciscan missionization of Indigenous people in California or the original non-Indigenous settlement of San Francisco).

REGULATORY CONTEXT

CEQA considers archaeological resources as an intrinsic part of the physical environment and, thus, requires for any project subject to CEQA-review that its potential to adversely affect an archaeological resource be analyzed (CEQA Sect. 21083.2). For a project that may have an adverse effect on a significant archeological resource, CEQA requires preparation of an environmental impact report (CEQA and Guidelines. Sect. 21083.2, Sect. 15065). CEQA recognizes two different categories of significant archeological resources: a "unique" archeological resource (CEQA Sect. 21083.2) and an archeological resource that qualifies as a "historical resource" under CEQA (CEQA and Guidelines. 21084.1, 15064.5).

Significance of Archeological Resources

An archeological resource can be significant as both or either a “unique” archeological resource and an “historical resource” but the process by which the resource is identified, under CEQA, as either one or the other is distinct (*CEQA and Guidelines* 21083.2(g) and 15064.5(a)(2)).

An archeological resource is an “historical resource” under CEQA if the resource is:

- 1) listed on or determined eligible for listing on the CRHR (*CEQA Guidelines* Sect. 15064.5). This includes National Register-listed or –eligible archeological properties.
- 2) listed in a “local register of historical resources”⁹
- 3) listed in a “historical resource survey”. (*CEQA Guidelines* Sect. 15064.5(a)(2))

Generally, an archeological resource is determined to be an “historical resource” due to its eligibility for listing to the CRHR/NRHP because of the potential scientific value of the resource, that is, “has yielded, or may be likely to yield, information important in prehistory or history” (*CEQA and Guidelines* Sect. 15064.5 (a)(3)). An archeological resource may be CRHR-eligible under other Evaluation Criteria, such as Criterion 1, association with events that have made a significant contribution to the broad patterns of history; Criterion 2, association with the lives of historically important persons; or Criterion 3, association with the distinctive characteristics of a type, period, region, or method of construction. Appropriate treatment for archeological properties that are CRHR-eligible under Criteria other than Criterion 4 may be different than that for a resource that is significant exclusively for its scientific value.

Failure of an archeological resource to be listed in any of these historical inventories, is not sufficient to conclude that the archeological resource is not an “historical resource”. When the lead agency believes there may be grounds for a determination that an archeological resource is a “historical resource”, then the lead agency should evaluate the resource for eligibility for listing to the CRHR (*CEQA Guidelines* Sect. 15064.5(a)(4)).

A “unique archeological resource” is a category of archeological resources created by the CEQA statutes (*CEQA Guidelines* Sect. 21083.2(g)). An archeological resource is a unique archeological resource if it meets any of one of three criteria:

- 1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type;
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Under CEQA, evaluation of an archeological resource as an “historical resource” is privileged over the evaluation of the resource as a “unique archaeological resource”, in that, CEQA requires that “when a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource” (*CEQA* Sect. 15064.5 (c)(1)).

⁹ A “local register of historical resources” is a list of historical or archeological properties officially adopted by ordinance or resolution by a local government.(Public Resources Code 5020.1 (k)).

Evaluation of an Archaeological Resource as Scientifically Significant

In requiring that a potentially affected archeological resource be evaluated as an historical resource, that is as an archeological site of sufficient scientific value to be CRHR-eligible, CEQA presupposes that the published guidance of the California Office of Historic Preservation (OHP) for CEQA providers is to serve as the methodological standard by which the scientific, and thus, the CRHR-eligibility, of an archeological resource is to be evaluated. As guidance for the evaluation of the scientific value of an archeological resource, the OHP has issued two guidelines: *Archaeological Resource Management Reports* (1989) and the *Guidelines for Archaeological Research Designs* (1991).

Integrity of Archeological Resource

Integrity is an essential criterion in determining that a resource, including an archeological resource, is an historical resource. In terms of CEQA "integrity" can, in part, be expressed in the requirement that an historical resource must retain "the physical characteristics that convey its historical significance" (CEQA § 15064.5 (b)).

For an archeological resource that is evaluated for CRHR-eligibility under Evaluation Criterion 4, "has yielded or may be likely to yield information important to prehistory or history", integrity is conceptually different than how it is usually applied to the built environment. For an historic building, possessing integrity means that the building retains the defining physical characteristics from the period of significance of the building. In archeology, an archeological deposit or feature may have undergone substantial physical change from the time of its deposition but it may yet have sufficient integrity to qualify as a historical resource. The integrity test for an archeological resource is whether the resource can yield sufficient data (in type, quantity, quality, diagnosticity) to address significant research questions. Thus, in archeology "integrity" is often closely associated with the development of a research design that identifies the types of physical characteristics ("data needs") that must be present in the archeological resource and its physical context to adequately address research questions appropriate to the archeological resource.

Significant Adverse Effect on an Archeological Resource

The determination of whether an effect on an archeological resource is significant depends on the effect of the project on those characteristics of the archeological resource that make the archeological resource significant. For an archeological resource that is an historical resource because of its prehistoric or historical information value, that is, its scientific data, a significant effect is impairment of the potential information value of the resource.

The depositional context of an archeological resource, especially soils stratigraphy can be informationally important to the resource in terms of datation and reconstructing the characteristics of the resource present at the time of deposition and interpreting the impacts of later deposition events on the resource. Thus, for an archeological resource eligible to the CRHR under Criterion 4, a significant adverse effect to its significance may not be limited to impacts on the artifactual material but may include effects on the soils matrix in which the artifactual matrix is situated.

Mitigation of Adverse Effect to an Archeological Resource

Preservation in place is the preferred treatment of an archeological resource (CEQA and Guidelines Sect. 21083.2(b); 15126.4 (b)(3)(a)). When preservation in place of an archeological

resource is not feasible, data recovery, in accord with a data recovery plan prepared and adopted by the lead agency prior to any soils disturbance, is the appropriate mitigation (CEQA 15126.4(b)(3)(C)). In addition to data recovery, under CEQA, the mitigation of effects to an archeological resource that is significant for its scientific value, requires curation of the recovered scientifically significant data in an appropriate curation facility (CEQA 15126.4(b)(3)(C)), that is a curation facility compliant with the *Guidelines for the Curation of Archaeological Collections* (California Office of Historic Preservation. 1993). Final studies reporting the interpretation, results, and analysis of data recovered from the archeological site are to be deposited in the California Historical Resources Regional Information Center (CEQA Guidelines 15126.4(b)(3)(C)).

Effects to Human Remains

Under State law, human remains and associated burial items may be significant resources in two ways: they may be significant to descendent communities for patrimonial, cultural, lineage, and religious reasons and human remains may also be important to the scientific community, such as prehistorians, epidemiologists, and physical anthropologists. The specific stake of some descendant groups in ancestral burials is a matter of law for some groups, such as Native Americans (CEQA Guidelines 15064.5 (d), Public Resources Code Sect. 5097.98). In other cases, the concerns of the associated descendent group regarding appropriate treatment and disposition of discovered human burials may become known only through outreach. Beliefs concerning appropriate treatment, study, and disposition of human remains and associated burial items may be inconsistent and even conflictual between descendent and scientific communities. CEQA and other State regulations concerning Native American human remains provide the following procedural requirements to assist in avoiding potential adverse effects to human remains within the contexts of their value to both descendants communities and the scientific community:

- When an initial study identifies the existence or probable likelihood that a project would impact Native American human remains, the lead agency is to contact and work with the appropriate Native American representatives identified through the Native American Heritage Commission (NAHC) to develop an agreement for the treatment and disposal of the human remains and any associated burial items (CEQA Guidelines 15064.5 (d), Public Resources Code Sect. 5097.98)
- If human remains are accidentally discovered, the county coroner must be contacted. If the county coroner determines that the human remains are Native American, the coroner must contact the NAHC within 24 hours. The NAHC must identify the most likely descendant (MLD) to provide for the opportunity to make recommendations for the treatment and disposal of the human remains and associated burial items. If the MLD fails to make recommendations within 24 hours of notification or the project applicant rejects the recommendations of the MLD, the Native American human remains and associated burial items must be reburied in a location not subject to future disturbance within the project site (Public Resources Code Sect. 5097.98).
- If potentially affected human remains/burial may have scientific significance, whether or not having significance to Native Americans or other descendent communities, then under CEQA, the appropriate mitigation of effect may require the recovery of the scientific information of the remains/burial through identification, evaluation, data recovery, analysis, and interpretation (CEQA Guidelines 15064.5(c)(2)).

Consultation with Descendant Communities:

Although not a requirement derived from CEQA, the cosmopolitan nature and history of San Francisco necessitates cultural management sensitivity to archeological remains associated with local indigenous, ethnic, overseas, and religious communities. On discovery of an archeological site¹⁰ associated with descendant Native Americans, the Overseas Chinese or, as appropriate any other community, the ERO should seek consultation with an appropriate representative¹¹ of the descendant group with respect to appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. Documentary products resulting from archeological research of the descendant community associated with the site should be made available to the community.

IMPACTS

Analysis of the Potential to Affect Archeological Resources

Since the adoption of the HCSMP would only result in programmatic level changes, it is not possible to identify potential specific physical effects to legally-significant¹² archeological resources that may result from physical projects or activities enabled by the recommendations and guidelines of the HCSMP. The HCSMP is a policy document that consists of identifying the current and projected needs for, and locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. Implementation of the HCSMP would not result in any adverse effects to archeological resources since they would not directly involve any material change to the physical environment, including subsurface soils that may contain archeological resources. Thus, the potential of the HCSMP to result in any direct or indirect effect to archeological resources is less than significant.

Impact CP-3: Implementation of the HCSMP would not destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant)

Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. Paleontological resources include vertebrate, invertebrate, and plant fossils or the trace or imprint of such fossils. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered nonrenewable resources because the organisms from which they derive no longer exist. Thus, once destroyed, a fossil can never be replaced. Ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities that could be implemented in the future could potentially damage or destroy paleontological resources that may be present below ground surface. As with archeological resources, paleontological resources are generally

¹⁰ By the term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

¹¹ An "appropriate representative" of the descendant group is here defined to mean, in the case of Native Americans, any individual listed in the current Native American Contact List for the City and County of San Francisco maintained by the California Native American Heritage Commission and in the case of the Overseas Chinese, the Chinese Historical Society of America.

¹² See "Significance of archeological resources" in the "Regulatory Context" above.

considered to be historical resources, as defined in Section 15064.5(a)(3)(D). Any implementation projects resulting from the HCSMP will be subject to project-specific environmental review, including preliminary archeology and geological review by the Environmental Planning division staff, to evaluate the potential of the project to affect legally-significant archeological resources. Thus, implementation of the HCSMP would result in a less than significant effect on paleontological resources.

Impact CP-4: Implementation of the HCSMP would not impact human remains. (Less than Significant)

Impacts on Native American burials are considered under Public Resources Code (PRC) Section 15064.5(d)(1). When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within a project site, the CEQA lead agency is required to work with the appropriate tribal entity, as identified by the California Native American Heritage Commission (NAHC). The lead agency may develop an agreement with the appropriate tribal entity for testing or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than the dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains.

Subsequent projects that may be implemented in the context of the HCSMP would be required to comply with applicable state laws, including immediate notification of the City and County of San Francisco (CCSF) Coroner should human remains and associated or unassociated funerary objects be discovered during any soils-disturbing activities. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC Section 5097.98). Because implementation of the HCSMP does not include any specific projects, it would not directly disturb Native American burials or any human remains, and would therefore have no significant impact on human remains.

Impact C-CP-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in cumulative impacts to cultural resources. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would result in less-than-significant impacts related to cultural or paleontological resources and would not result in a cumulatively considerable contribution to cultural or paleontological impacts. For the reasons discussed above, the proposed project's impacts related to cultural or paleontological resources, both individually and cumulatively, would be less than significant.

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) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Below is a list of significance criteria used by the San Francisco Planning Department to assess whether a proposed project would result in significant impacts to the transportation network. These criteria are organized by transportation mode to facilitate the transportation impact analysis; however, the transportation significance thresholds are essentially the same as the ones presented above in the checklist.

- The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection level of service (LOS) to deteriorate from LOS D or better to LOS E or F, or from LOS E to LOS F. The project may result in significant adverse impacts at intersections that operate at LOS E or F under existing conditions depending upon the magnitude of the project's contribution to the worsening of the average delay per vehicle. In addition, the project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in levels of service to unacceptable levels.
- The project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, the

project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the peak hour.

- The project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.
- The project would have a significant effect on the environment if it would create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the site and adjoining areas.
- A project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and created potentially hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians.
- The project would have a significant effect on the environment if it would result in inadequate emergency access.
- Construction-related impacts generally would not be considered significant due to their temporary and limited duration.
- The project would have a significant effect on the environment if it would result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians and where particular characteristics of the project or its site demonstrably render use of other modes infeasible.

Approach to Analysis

This section addresses the potential transportation effects related to implementation of the HCSMP. The HCSMP is a policy document that consists of identifying the current and projected needs for, and locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The HCSMP does not include specific projects, and as such would not generate new person trips. Therefore, the analysis of this policy document focuses on how the HCSMP recommendations and guidelines correspond with other City and General Plan transportation policies related to traffic, transit, pedestrian, bicycle and emergency vehicle access. The policy analysis therefore, does not include level of service (LOS), transit demand, etc. analyses that would be typical for a development project that would generate person trips. Similarly, since no specific projects are included, an analysis of construction-related transportation effects is not required. The HCSMP would not alter or affect air traffic patterns.

Transportation Setting

Existing Roadway Network

The Transportation Element of the General Plan classifies roadways by type within the City ranging from Freeways, Major and Secondary Arterials to Collector and Local Streets. The

General Plan further identifies Primary Transit, Transit Preferential Streets and Citywide or Neighborhood Pedestrian Network Streets.

Transit Network

Local transit service throughout the City is provided by Muni, the transit division of the San Francisco Municipal Transportation Authority (SFMTA). Muni operates a fleet of buses, cable cars and light rail routes throughout the City providing both local service and connections to regional transit providers serving the North Bay, East Bay, South Bay and the Peninsula. Golden Gate Transit buses and ferries provide service to the North Bay; Bay Area Rapid Transit (BART), the Water Emergency Transportation Authority (WETA) and Alameda-Contra Costa Transit (AC Transit) District to the East Bay; and Caltrain and San Mateo County Transit District (SamTrans) to the South Bay and Peninsula. Muni routes operate seven days a week, primarily between 6 a.m. to midnight; schedules vary route-by-route, with some late night (Owl) service. Service frequencies range from three to 30 minutes depending on time of day and route, with the most frequent service provided during the weekday AM peak period (7 – 9 a.m.) and PM peak period (6 – 9 p.m.). Typical peak capacities for transit operations occur during the weekdays, in the inbound (to Downtown) direction in the mornings and in the outbound (away from downtown) in the evenings.

Bicycle Facilities

As indicated in the Transportation Element of the General Plan and the San Francisco Bicycle Plan, the City has a series of designated bike routes and facilities including Class I (separated bike paths), Class II (bike lanes), and Class III (signed but shared streets) facilities, which interconnect neighborhoods, attractions, and commute destinations throughout the City.

Pedestrian Facilities

Sidewalks are provided on most city streets on both sides, and are wider (up to 30 feet) on major pedestrian corridors (such as The Embarcadero). Most of the intersections with major pedestrian activity are signalized with pedestrian signals and crosswalks, and the heaviest pedestrian activities tend to occur in or near tourist attractions and in downtown commercial areas. The City has several ongoing programs to enhance pedestrian safety and facilities including investing in 'safe routes' to schools, adding pedestrian amenities such curb bulb-outs and benches and calming traffic where desirable to improve pedestrian conditions.

Loading Facilities

Commercial loading facilities throughout the City are provided for corresponding land uses consistent with Section 152 of the Planning Code. On-street passenger loading throughout the City is designated by white curbs and tends to be located near tourist (e.g., hotel, event) locations and transit facilities (BART stations). Additionally, on- or off-street passenger loading areas may be provided in relation to specific land uses, such as schools.

Parking Conditions

On-street parking conditions throughout the City vary depending on location, from on-street metered parking to unlimited (except for street-sweeping maintenance hours) on-street parking. Similarly the availability of off-street parking, both private and public, vary by location with more facilities being provided in the Downtown or adjacent areas than other areas of the City, where on-street parking is more readily available.

Key Transportation Policies and Regulations

The following is a summary of City policies and regulations related to transportation that were considered in the analysis of the HCSMP recommendations and guidelines.

San Francisco Countywide Transportation Plan

The San Francisco County Transportation Authority is the designated Congestion Management Agency for San Francisco. The SFCTA is responsible for preparing a long-range Countywide Transportation Plan, prioritizing transportation investment and developing and maintaining a computerized travel demand forecasting model and related databases.

San Francisco General Plan

The Transportation Element of the General Plan is composed of several sections including 1) General, 2) Regional Transportation, 3) Congestion Management, 4) Vehicle Circulation, 5) Transit, 6) Pedestrians, 7) Bicycles, 8) Citywide Parking and 9) Goods Movement. Each section consists of objectives and policies regarding a particular segment of the master transportation system.

San Francisco Municipal Code

The San Francisco Transportation, Planning, Police and Building Code of the Municipal Code all contain provisions and regulations for traffic devices, building and facility requirements, operation of vehicles, and vehicle trip reduction.

San Francisco Transit First Policy

The San Francisco City Charter (Section 16.102) includes the Transit First Policy, a set of principles which underscore the City's commitment that travel by transit, bicycle and foot be given priority over the private automobile. These principles are further emphasized in the goals and policies of the General Plan's Transportation Element.

San Francisco Transit Effectiveness Project

The Transit Effectiveness Project (TEP) presents a thorough review of San Francisco's public transit system, initiated by SFMTA in collaboration with the City Controller's Office. The TEP is aimed at improving reliability, reducing travel times, providing more frequent service and updating Muni bus routes and rail lines to better match current travel patterns. The TEP recommendations were unanimously endorsed for purposes of initiating environmental review by the SFMTA Board of Directors in October 2008. They include new routes and route extensions, more service on busy routes, and elimination or consolidation of certain routes or route segments. SFMTA published a TEP Implementation Strategy on April 5, 2011. The TEP Implementation Strategy anticipates that many of the service improvements would be implemented sometime between the end of Fiscal Year (FY) 2013 and FY 2015 and that the remainder of the service improvements would occur in FY 2016.¹³

San Francisco Bicycle Plan

The San Francisco Bicycle Plan includes short-term and long-term planned improvements for bicycle facilities throughout the City and is currently being implemented by SFMTA. Bicycle

¹³ SFMTA. Draft Transit Effectiveness Project Implementation Strategy. April 5, 2011. page 3-5.

improvements range from new bike lanes to better bicycle route signage, and are located throughout the City, generally along existing designated bicycle routes.

Better Streets Plan

The Better Streets Plan consists of a set of guidelines to make San Francisco streets more useable, attractive and accessible, to make them safer and more welcoming to pedestrians, to improve their ecological functioning, and to make them a more central point of civic life.

WalkFirst Project

The WalkFirst project is an interdepartmental collaborative project with the goal to identify key walking streets throughout San Francisco and establish criteria to prioritize pedestrian improvements fostering pedestrian safety and walking conditions, encourage walking, and enhance pedestrian connections to key destinations. This project builds on the Better Streets Plan and coordinates with other efforts to improve the City's streets and transportation system.

SFPark

The SFPark Program, implemented by SFMTA, improves parking management of metered spaces through providing dynamic information to drivers and in some locations varies the cost of parking based on demand. The SFPark Program aims to reduce traffic congestion related to drivers searching for available on-street parking spaces.

SFGo

Also implemented by SFMTA, the SFGo program is a citywide traffic management system which enables SFMTA traffic engineers, through monitoring cameras to remotely alter traffic signal controllers in key locations to dynamically adjust intersection signal timing in response to observed congestion or traffic incidents. Engineers also have access to control electronic message boards to alert drivers to upcoming observed conditions. Sometime in the future, the SFGo control center will be combined with Muni Central Control, so that transit operations can better respond to real-time congestion and incidents.

Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT)

ISCOTT is a city staff committee that reviews applications for temporary street closures for special events, including street fairs, athletic events, and neighborhood block parties, at a meeting open to the public. ISCOTT is composed of representatives of several agencies including SFMTA, including Muni Operations Division, Public Works, Police, Fire, Public Health, and the Port of San Francisco.

Impact TR-1: Implementation of the HCSMP would not result in significant impacts related to traffic conditions or conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, or with an applicable congestion management program. (Less than Significant)

The HCSMP is a policy document and its recommendations and guidelines would not generate new person trips, including vehicle trips, and as such would not result in impacts to traffic conditions, operations or hazards. No direct person trip generation is associated with adopting these policies. As discussed in Population and Housing of this Initial Study, increases in residents

and employment are projected to occur in San Francisco over a planning horizon of the next 20 years with or without implementation of the HCSMP.

The HCSMP identifies the current and projected needs for, and locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. HCSMP Guideline 2.1.2 calls for the City to "Review the impact of large-scale residential and mixed-use development projects – and/or expected areas of new growth – on the potential impact on neighborhood residents' future health care needs and, when feasible, such projects should address service connectivity. Projects serving seniors, persons with disabilities, or other populations with limited mobility options, for example, should employ a range of transportation demand management strategies (e.g., shuttle service, gurney service) to address the project's impact and utility for the community." The HCSMP would not substantially or adversely affect traffic conditions in the City. In addition, the HCSMP would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, or with an applicable congestion management system.

Future projects that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to separate, independent study and environmental review. Therefore, HCSMP recommendations and guidelines would not conflict with the General Plan's Transportation Element and would not significantly impact traffic conditions in the City. Thus, implementation of the HCSMP would have a less-than-significant impact on traffic, individually and cumulatively.

Impact TR-2: Implementation of the HCSMP would not result in significant impacts related to transit demand or transit operation or substantially conflict with adopted policies, plans or programs regarding public transit, or otherwise decrease transit performance or safety. (Less than Significant)

As discussed above, the HCSMP recommendations and guidelines would not directly generate new person trips, including transit trips, and as such would not result in impacts to transit demand or substantially alter transit operations. Generally the City is well-served by transit with one or more transit routes within walking distance. The following HCSMP policies address transit demand and transit operation.

Guideline 2.1.2 calls for the City to "Review the impact of large-scale residential and mixed-use development projects – and/or expected areas of new growth – on the potential impact on neighborhood residents' future health care needs and, when feasible, such projects should address service connectivity. Projects serving seniors, persons with disabilities, or other populations with limited mobility options, for example, should employ a range of transportation demand management strategies (e.g., shuttle service, gurney service) to address the project's impact and utility for the community."

Recommendation 3.5 calls for the City to "Ensure that San Francisco residents – particularly those without regular car access – have available a range of appropriate transportation options (e.g., public transportation, shuttle services, bike lanes, etc.) that enable them to reach their health care destinations safely, affordably, and in a timely manner."

Guideline 3.5.1 calls for the City to “Support the recommendations of the Municipal Transportation Agency’s (MTA) Transit Effectiveness Project, which is expected to positively impact passenger travel times on high ridership routes, including those that service San Francisco’s major health care facilities.”

Guideline 3.5.3 states that “As part of transit demand management efforts for patients, develop safe health care transit options beyond the public transportation system (e.g., bike storage, health care facility shuttle service, etc.) to increase health care access for those without regular car access.”

Guideline 3.5.4 calls for the City to “Provide transportation options (e.g., taxi vouchers, shuttles, other innovative transportation options, etc.) from low-income areas and areas with documented high rates of health disparities – particularly those with transportation access barriers – to health care facilities.”

Guideline 3.5.8 calls for the City to “Increase awareness of transportation options to health care facilities during facility hours. This may include but not be limited to providing relevant bus information in providers’ offices.”

In light of the above, implementation of the HCSMP would not conflict with the City’s Transit First Policy, and as policies, would not substantially or adversely affect transit conditions in the City. As such, the recommendations and guidelines of the HCSMP would be consistent with the City’s Transportation Element, planned TEP service improvements, and ‘Transit First’ transportation policies to encourage alternate modes of travel including transit. The HCSMP would not substantially or adversely affect transit conditions in the City. Future projects that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to separate, independent study and environmental review.

Impact TR-3: Implementation of the HCSMP would not result in significant impacts related to bicycles or bicycle facilities or substantially conflict with adopted policies, plans or programs regarding bicycle facilities or otherwise decrease the performance or safety of such features. (Less than Significant)

As discussed above, the HCSMP recommendations and guidelines would not directly generate new person trips and as such would not result in impacts to bicycle facilities. The following HCSMP policies address bicycle facilities and conditions.

Guideline 2.1.1 calls for the City to “Support the expansion of networks of open spaces, small urban agriculture, and physical recreation facilities, including the network of safe walking and biking facilities.”

Recommendation 3.5 calls for the City to “Ensure that San Francisco residents – particularly those without regular car access – have available a range of appropriate transportation options (e.g., public transportation, shuttle services, bike lanes, etc.) that enable them to reach their health care destinations safely, affordably, and in a timely manner.”

Guideline 3.5.3 states that “As part of transit demand management efforts for patients, develop safe health care transit options beyond the public transportation system (e.g., bike storage, health care facility shuttle service, etc.) to increase health care access for those without regular car access.”

Implementation of the HCSMP would neither create potentially hazardous conditions for bicyclists nor otherwise substantially interfere with bicycle accessibility to parks or adjoining areas. The HCSMP would therefore not conflict with City’s Transportation Element and transportation policies to encourage alternate modes of travel including bicycles, and would not significantly impact bicycle conditions in the City. Future projects that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to separate, independent study and environmental review.

Impact TR-4: Implementation of the HCSMP would not result in significant adverse effects related to pedestrians or pedestrian facilities or substantially conflict with adopted policies, plans or programs regarding pedestrian facilities or otherwise decrease the performance or safety of such features. (Less than Significant)

As discussed above, the HCSMP recommendations and guidelines would not generate new person trips, including pedestrian trips, and as such would not result in impacts to pedestrian facilities. The following HCSMP policies address pedestrian conditions and facilities.

Recommendation 2.1 calls for the City to “Support “healthy” urban growth, the following guidelines would support the improvement of pedestrian conditions.”

Guideline 2.1.1 calls for the City to “Support the expansion of networks of open spaces, small urban agriculture, and physical recreation facilities, including the network of safe walking and biking facilities.”

Guideline 2.1.3 calls for the City to “Encourage residential and mixed-use projects to incorporate healthy design – design encouraging walking and safe pedestrian environments.”

Guideline 3.5.7 calls for the City to “Promote ongoing collaboration with MTA and San Francisco County Transportation Authority staff to consider pedestrian safety near health care facilities as well as how safety may be impacted by ongoing transportation planning and projects.”

Implementation of the HCSMP would not be expected to result in substantial overcrowding on public sidewalks and would not create potentially hazardous conditions for pedestrians. The HCSMP would not conflict with City’s Transportation Element and policies to encourage alternate modes of travel including pedestrian travel, and as policies would not significantly impact pedestrian conditions, individually or cumulatively. Future projects that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to separate, independent study and environmental review.

Impact TR-5: Implementation of the HCSMP would not result in loading conflicts. (Less than Significant)

The HCSMP does not include any recommendations or guidelines that pertain to loading, and any specific project implementation that would occur as an indirect result of the HCSMP or in the context of the HCSMP would be subject to separate project-level environmental review that would evaluate the potential for conflicts associated with on- or off-street loading. Implementation of the HCSMP would not be expected to create potentially hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians. Future projects that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to separate, independent study and environmental review.

Impact TR-6: Implementation of the HCSMP would not substantially increase hazards due to a design feature or incompatible uses. (Less than Significant)

As a policy document, no specific projects are proposed under the HCSMP at this time. Future projects that would occur as an indirect result of the HCSMP or in the context of the HCSMP would be subject to separate, independent study and environmental review that would evaluate the potential for conflicts associated with design features or incompatible uses. The HCSMP does not include any policies that would result in design features that would substantially increase hazards (e.g., creating a new sharp curve or dangerous intersections), and would not include any incompatible uses. Therefore, this impact would be less than significant.

Impact TR-7: Implementation of the HCSMP would not result inadequate emergency access. (Less than Significant)

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. Any specific project implementation or program as an indirect result of the HCSMP or in the context of the HCSMP would be subject to project-level review, including the examination of any alteration of vehicle access as part of ISCOTT review, environmental review or both. As such, implementation of the HCSMP would not result in inadequate emergency access.

Impact TR-8: Implementation of the HCSMP would not result in a substantial parking deficit that could create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians. (Less than Significant)

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The recommendations and guidelines of the HCSMP would not generate new person trips, including vehicle trips, and no direct person trip generation is associated with adopting these policies.

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. While parking conditions change over time, a substantial deficit in parking caused by a project that creates hazardous conditions or significant delays to traffic, transit, bicycles or pedestrians could adversely affect the physical environment. Whether a deficit in parking creates such conditions will depend on the magnitude of the shortfall and the ability of drivers to change travel patterns or switch to other travel modes. If a substantial deficit in parking caused by a project creates hazardous conditions or significant delays in travel, such a condition could also result in secondary physical environmental impacts (e.g., air quality or noise impacts caused by congestion), depending on the project and its setting.

The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking), would be in keeping with the City's "Transit First" policy and numerous San Francisco General Plan Policies, including those in the Transportation Element. The City's Transit First Policy, established in the City's Charter Article 8A, Section 8A.115 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area, and thus choose to reach their destination by other modes (i.e. walking, biking, transit, taxi). If this occurs, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, would reasonably address potential secondary effects.

The HCSMP does not include policies that pertain to parking. Based on the above, implementation of the HCSMP would not substantially affect existing parking conditions throughout the City and would be consistent with the City's Transit First Policy. Therefore, implementation of the HCSMP would not result in a substantial parking deficit and would not create hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians. Future projects that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to separate, independent study and environmental review.

Impact C-TR-1: Implementation of the HCSMP, in combination of past, present, and reasonably foreseeable future projects would not result in substantial cumulative transportation impacts. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would not result in transportation-related impacts and would not result in a cumulatively considerable contribution to transportation-related impacts. For the reasons discussed above, the proposed project's impacts related to transportation and circulation, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
6. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The HCSMP covers an area that is not within an airport land use plan area in the vicinity of private airstrips. Therefore, topics 6e and 6f are not applicable.

Impact NO-1: Implementation of the HCSMP would not expose persons to noise levels in excess of standards established in the General Plan or noise ordinance; nor would the implementation of the HCSMP be substantially affected by existing noise. (Less than Significant)

Noise in San Francisco is regulated by the following state and local statutes:

- **Construction Noise:** Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code), amended in November 2008. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA¹⁴ at a distance of 100 feet from the source. Impact tools (jackhammers, hoerammers, impact wrenches) must have both intake and exhaust mufflers as well as be equipped with acoustically attenuating shields or shrouds to the satisfaction of the Director of Public Works or the Director of Building Inspection. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection.
- **Fixed Sources:** The Noise Ordinance limits noise from sources defined as “any machine or device, music or entertainment or any combination of same” located on residential or commercial/industrial property to 5 dBA or 8 dBA, respectively, above the local “ambient”¹⁵ at any point outside of the property plane of a residential, commercial/industrial or public land use, respectively, containing the noise source. An additional low-frequency criterion applies to noise generated from a licensed Place of Entertainment, specifically that no associated noise or music shall exceed the low-frequency ambient noise level by more than 8 dBA. The Noise Ordinance limits noise from a “fixed source”¹⁶ from causing the noise level measured inside any sleeping or living room in any dwelling unit located on residential property to 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open except where building ventilation is achieved through mechanical systems that allow windows to remain closed.
- **Noise Insulation:** California’s Building Standards Code (Title 24 of the California Code of Regulations, which at the local level is enforced by the Department of Building Inspection) establishes energy efficiency standards for residential and non-residential buildings. Title 24

¹⁴ Sound pressure is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing, and 120 dB to 140 dB corresponding to the threshold of pain. Because sound pressure can vary by over one trillion times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers at a convenient and manageable level. Owing to the variation in sensitivity of the human ear to various frequencies, sound is “weighted” to emphasize frequencies to which the ear is more sensitive, via a method known as A-weighting and expressed in units of A-weighted decibels (dBA).

¹⁵ By definition, Noise Ordinance Section 2901(a) states “ambient” means the lowest sound level repeating itself during a minimum ten-minute period as measured with a type 1, precision sound level meter, set on slow response and A-weighting ... in no case shall the ambient be considered or determined to be (1) less than 35 dBA for interior residential noise, and (2) 45 dBA in all other locations.”

¹⁶ Noise Ordinance Section 2901(e) states “fixed source” means a machine or device capable of creating a noise level at the property upon which it is regularly located, including but not limited to: industrial and commercial process machinery and equipment, pumps, fans, air conditioning apparatus or refrigeration machines.

also contains noise insulation standards that require new multi-unit and hotel/motel structures to meet an interior noise level not exceeding 45 dBA (Ldn) in any habitable room and, where such units are proposed in areas subject to outdoor noise levels in excess of than 60 dBA (Ldn), acoustical studies must be conducted that demonstrate that the design of the building will reduce interior noise to 45 dBA (Ldn) or less. If compliance with the required interior noise levels would only occur with windows closed, an alternative means of ventilation must be provided.

- **Land Use Compatibility:** The San Francisco General Plan, which contains Land Use Compatibility Guidelines for Community Noise in its Environmental Protection Element.¹⁷ These guidelines, which are similar to state guidelines promulgated by the Governor's Office of Planning and Research, indicate maximum acceptable noise levels for various newly developed land uses.¹⁸

Ambient noise levels in the City are dominated by vehicular traffic, including trucks, cars, Muni buses, emergency vehicles, and land use activities, such as commercial businesses and periodic temporary construction-related noise from nearby development, or street maintenance. Noises generated by residential and commercial uses are common and generally accepted in urban areas.

The HCSMP is a policy document that does not include specific projects. Implementation of the HCSMP would not directly increase ambient noise levels, or directly result in construction noise effects. Future construction work that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to the above regulations and local statutes, and would be reviewed based on the specifics of the land use program or proposal for their potential to cause adverse noise effects. In addition, implementation of the HCSMP would not be substantially affected by existing noise. As such, the HCSMP would have a less than significant impact on noise at both the individual and cumulative level.

Impact NO-2: Implementation of the HCSMP would not result in exposure of persons to generation of excessive groundborne vibration or groundborne noise levels. (Less than Significant)

The implementation of the HCSMP does not include the construction of buildings or facilities. Construction activities of future projects that could be developed in the context of the HCSMP could require the use of heavy equipment for grading and excavation that may result in groundborne vibration effects. However, because no construction improvements are proposed at this time, specific construction details associated with possible projects, including phasing, duration and types of construction equipment are not known. Future projects that would occur indirectly as a result of the HCSMP or in the context of the HCSMP would be subject to separate,

¹⁷ *San Francisco General Plan, Environmental Protection Element, Policy 11.1*, San Francisco Planning Department, June 30, 2007, Figure 19 – Land Use Compatibility Chart for Community Noise. Accessible on-line at http://www.sf-planning.org/sftp/general_plan/16_Environmental_Protection.htm. Available for public review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco.

¹⁸ The residential guidelines are based on maintaining an interior noise level of 45 dBA, Ldn, as required by the California Noise Insulation Standards in Title 24, Part 2 of the California Code of Regulations.

independent study and environmental review. Compliance with the Noise Ordinance is required by law and would serve to avoid significant negative impacts on sensitive receptors such as residential uses and hospitals. Therefore, vibration impacts associated with the proposed HCSMP would be less than significant, both individually and cumulatively.

Impact NO-3: Implementation of the HCSMP is not expected to cause a substantial permanent increase in ambient noise levels. (Less than Significant)

The General Plan's Environmental Protection Element includes the following objectives and policies related to noise: "Promote site planning, building orientation and design and interior layout that will lessen noise intrusion." (Policy 10.1); "Promote land uses that are compatible with various transportation noise levels." (Objective 11); and "Locate new noise-generating development so that the noise impact is reduced." (Policy 11.3).

In most of San Francisco, traffic makes the greatest contribution to ambient noise levels. The HCSMP would not directly generate person trips and would not be expected to increase vehicle trips as no development is proposed. It should be noted that no potential noise impacts associated with implementing the HCSMP are identified here, and as such, no mitigation measures are required.

The recommendations and guidelines of the HCSMP would not conflict with the policies in the General Plan's Environmental Protection Element that pertain to noise. Scientific studies indicate that an approximate doubling of traffic volumes would be necessary to produce an increase in ambient noise levels noticeable to most people.¹⁹ Implementation of the HCSMP policies would not cause traffic volumes to double since the HCSMP would not result in new person trips. Therefore, the HCSMP would have a less than significant effect on ambient noise levels, individually and cumulatively. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact NO-4: Implementation of the HCSMP would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels that would occur without the proposed HCSMP. (Less than Significant)

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code), amended in November 2008. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m. if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

Construction activities other than pile driving typically generate noise levels no greater than 90 dBA at 50 feet from the activity, while other activities, such as concrete work, are much less

¹⁹ *San Francisco Better Streets Plan Mitigated Negative Declaration*, p. 111. Available for review at the Planning Department, 1650 Mission Street, Suite 400 in Case File No. 2007.1238E.

noisy. Closed windows typically can reduce daytime interior noise levels to an acceptable level. Although construction noise could be annoying at times, it would typically not be expected to exceed noise levels commonly experienced in an urban environment, and would not be considered significant especially with the above-noted applicable construction noise regulation.

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The HCSMP does not include any specific projects at this time. Any future projects in the context of the HCSMP would require separate project-level environmental review and would require compliance with the Noise Ordinance. Therefore, the HCSMP would have a less than significant impact with respect to a substantial temporary or periodic increase in ambient noise levels.

Impact C-NO-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative noise impacts. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would not result in construction or operation noise impacts and would not be expected to contribute to any significant cumulative increases in ambient noise as a result of the project. For the reasons discussed above, the proposed project's impacts related to noise, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
7. AIR QUALITY—Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Setting

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the 2010 Clean Air Plan, was adopted by the BAAQMD on September 15, 2010. The 2010 Clean Air Plan updates the Bay Area 2005 Ozone Strategy 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 gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The 2010 Clean Air Plan contains the following primary goals: (i.) Attain air quality standards; (ii.) Reduce population exposure and protect public health in the San Francisco Bay Area; and (iii.) Reduce greenhouse gas emissions and protect the climate.

The 2010 Clean Air Plan represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of an applicable air quality plan.

Criteria Air Pollutants

In accordance with the state and federal CAAs, 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. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment²⁰ or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.²¹

²⁰ "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.

²¹ Bay Area Air Quality Management District (BAAQMD). *California Environmental Quality Act Air Quality Guidelines*. May 2011. page 2-1.

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 4 identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

Table 4
Criteria Air Pollutant Significance Thresholds

Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	

Ozone Precursors. As discussed previously, the SFBAAB is currently designated as non-attainment for ozone and particulate matter (PM₁₀ and PM_{2.5})²². Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health based ambient air quality standards. Similarly, to ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NO_x, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).²³ These levels represent emissions by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Although this regulation applies to new or modified stationary sources, land use development projects result in ROG and NO_x emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds, would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ROG and NO_x emissions.

²² PM₁₀ is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. PM_{2.5}, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.

²³ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, page 17.

Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Particulate Matter (PM10 and PM2.5). The BAAQMD has not established an offset limit for PM2.5. However, the emissions limit in the federal NSR for stationary sources in nonattainment areas is an appropriate significance threshold. For PM10 and PM2.5, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels at which a source is not expected to have an impact on air quality.²⁴ Similar to ozone precursor thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Again, because construction activities are temporary in nature, only the average daily thresholds are applicable to construction-phase emissions.

Fugitive Dust. Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust.²⁵ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.²⁶ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.²⁷ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of measures to control fugitive dust to ensure that construction projects do not result in visible dust. The BMPs employed in compliance with the City's Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but of short-term) adverse effects to human health, including carcinogenic effects. A TAC is defined in California Health and Safety Code §39655 as an air pollutant which may cause or contribute to an increase in mortality or serious illness, or which may pose a present or potential hazard to human health. Human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach. This approach uses a health risk assessment to determine which sources and pollutants to control as well as the degree of control. A health risk

²⁴ BAAQMD. *Revised Draft Options and Justification Report. California Environmental Quality Act Thresholds of Significance*. October 2009, page 16.

²⁵ Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/deff/fdh/content/FDHandbook_Rev_06.pdf, accessed June 24, 2013.

²⁶ BAAQMD. *Revised Draft Options and Justification Report. California Environmental Quality Act Thresholds of Significance*. October 2009, page 27.

²⁷ BAAQMD. *CEQA Air Quality Guidelines*. May 2011.

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.²⁸

Vehicle tailpipe emissions contain numerous TACs, including benzene, 1,3-butadiene, formaldehyde, acetaldehyde, acrolein, naphthalene, and diesel exhaust.²⁹ Engine exhaust, from diesel, gasoline, and other combustion engines, is a complex mixture of particles and gases, with collective and individual toxicological characteristics. While each constituent pollutant in engine exhaust may have a unique toxicological profile, health effects have been associated with proximity, or exposure, to vehicle-related pollutants collectively as a mixture.³⁰ Exposures to fine particulate matter (PM_{2.5}) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.³¹ In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.³² Mobile sources such as trucks and buses are among the primary sources of diesel emissions, and concentrations of DPM are higher near heavily traveled roadways. The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than for other land uses. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed "air pollution hot spots," were identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative PM_{2.5} concentrations greater than 10 micrograms per cubic meter (µg/m³).

²⁸ In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

²⁹ San Francisco Department of Public Health (SFPDH), *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

³⁰ Delfino RJ, 2002, "Epidemiologic evidence for asthma and exposure to air toxics: linkages between occupational, indoor, and community air pollution research," *Environmental Health Perspectives*, 110(S4):573-589.

³¹ SFPDH, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008.

³² California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

Excess Cancer Risk. The above 100 per one million persons (100 excess cancer risk) criteria is based on United State Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.³³ As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the “acceptable” range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,³⁴ the USEPA states that it “...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years.” The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.³⁵

Fine Particulate Matter. In April 2011, the USEPA published Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards, “Particulate Matter Policy Assessment.” In this document, USEPA staff concludes that the current federal annual PM_{2.5} standard of 15 µg/m³ should be revised to a level within the range of 13 to 11 µg/m³, with evidence strongly supporting a standard within the range of 12 to 11 µg/m³. Air pollution hot spots for San Francisco are based on the health protective PM_{2.5} standard of 11 µg/m³, as supported by the USEPA’s Particulate Matter Policy Assessment, although lowered to 10 µg/m³ to account for error bounds in emissions modeling programs.

Land use projects within these air pollution hot spots require special consideration to determine whether the project’s activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

Construction Air Quality Impacts

Project-related air quality impacts fall into two categories: short-term impacts due to construction and long term impacts due to project operation. The following addresses construction-related air quality impacts resulting from the proposed project.

Impact AQ-1: Implementation of the HCSMP would not result in construction activities and would not generate fugitive dust and criteria air pollutants, and would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Construction activities (short-term) typically result in emissions of fugitive dust, criteria air pollutants, and DPM. Emissions of criteria pollutants and DPM are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROG_s are also emitted from activities that involve painting or other types of architectural coatings or asphalt paving activities. As a policy document, implementation of the HCSMP would not involve construction activities,

³³ BAAQMD. *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*. October 2009. page 67.

³⁴ 54 Federal Register 38044. September 14, 1989.

³⁵ BAAQMD. *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*. October 2009. page 67.

and therefore would not result in the generation of fugitive dust emissions, criteria air pollutants and DPM. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the California Air Resources Board, reducing ambient particulate matter from 1998-2000 levels to natural background concentrations in San Francisco would prevent over 200 premature deaths.

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust to add to particulate matter in the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

In response, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as 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 Department of Building Inspection (DBI).

The 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 DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated

materials, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 millimeter (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

For projects over one half-acre, such as the proposed project, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan, unless the Director waives the requirement. Interior-only tenant improvement projects that are over one-half acre in size that will not produce exterior visible dust are exempt from the site-specific Dust Control Plan requirement.

The site-specific Dust Control Plan would require the project sponsor to: submit of a map to the Director of Public Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15 mph speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements.

Compliance with these regulations and procedures set forth by the San Francisco Building Code would ensure that potential dust-related air quality impacts would be reduced to a level of insignificance.

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. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 4, above, the BAAQMD, in its CEQA Air Quality Guidelines (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the proposed project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The *CEQA Air Quality Guidelines* note that the screening levels are generally representative of new development on greenfield³⁶ 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

³⁶ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

that could also result in lower emissions. For projects that are mixed-use, infill, and/or proximate to transit service and local services, emissions would be expected to be less than the greenfield-type project that the screening criteria are based upon.

As a policy document, implementation of the HCSMP would not involve construction activities and therefore the HCSMP would be below the criteria air pollutant screening sizes identified in the BAAQMD's *CEQA Air Quality Guidelines*. Thus, quantification of construction-related criteria air pollutant emissions is not required, and implementation of the HCSMP would result in a less-than-significant construction criteria air pollutant impact. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact AQ-2: Implementation of the HCSMP would not generate toxic air contaminants, including diesel particulate matter, and would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

Off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected.³⁷ Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California.³⁸ This reduction in emissions is due, in part, to effects of the economic recession and refined emissions estimation methodologies. For example, revised particulate matter (PM) emission estimates for the year 2010, which DPM is a major component of total PM, have decreased by 83 percent from previous estimates for the SFBAAB.³⁹ Approximately half of the reduction can be attributed to the economic recession and approximately half can be attributed to updated assumptions independent of the economic recession (e.g., updated methodologies used to better assess construction emissions).⁴⁰

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California 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 would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NOx and PM emissions

³⁷ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, p.1 and p. 13 (Figure 4), October 2010.

³⁸ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

³⁹ ARB, "In-Use Off-Road Equipment, 2011 Inventory Model," Query accessed online, April 2, 2012, http://www.arb.ca.gov/msei/categories.htm#inuse_or_category.

⁴⁰ ARB, *Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements*, October 2010.

will be reduced by more than 90 percent.⁴¹ Furthermore, California regulations limit maximum idling times to five minutes, which further reduces public exposure to DPM emissions.⁴²

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the BAAQMD's CEQA Air Quality Guidelines:

"Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk."⁴³

As a policy document, implementation of the HCSMP would not involve construction activities. Therefore, construction period TAC emissions would result in a less-than-significant impact to sensitive receptors. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Operational Air Quality Impacts

Land use projects typically result in emissions of criteria air pollutants and toxic air contaminants primarily from an increase in motor vehicle trips. However, land use projects may also result in criteria air pollutants and toxic air contaminants from combustion of natural gas, landscape maintenance, use of consumer products, and architectural coating. The following addresses air quality impacts resulting from operation of the HCSMP.

Impact AQ-3: Implementation of the HCSMP would not result in emissions of criteria air pollutants, and therefore would not violate an air quality standard, contribute to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

As discussed above in Impact AQ-1, the BAAQMD, in its *CEQA Air Quality Guidelines* (May 2011), has developed screening criteria to determine whether a project requires an analysis of project-generated criteria air pollutants. If all the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment.

As a policy document, implementation of the HCSMP would not result in operational activities, and therefore, the proposed project would be below the criteria air pollutant screening sizes identified in the BAAQMD's *CEQA Air Quality Guidelines*. Thus, quantification of project-generated criteria air pollutant emissions is not applicable, and the proposed project would not

⁴¹ United State Environmental Protection Agency (USEPA). "Clean Air Nonroad Diesel Rule: Fact Sheet." May 2004.

⁴² California Code of Regulations, Title 13, Division 3, § 2485.

⁴³ BAAQMD. *CEQA Air Quality Guidelines*. May 2011, page 8-6.

exceed any of the significance thresholds for criteria air pollutants, and would result in less than significant impact with respect to criteria air pollutants. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact AQ-4: Implementation of the HCSMP would not generate toxic air contaminants, including diesel particulate matter, and therefore would not expose sensitive receptors to substantial air pollutant concentrations. (Less than Significant)

Sources of Toxic Air Contaminants

Vehicle Trips. Individual projects result in emissions of toxic air contaminants primarily as a result of an increase in vehicle trips. The BAAQMD considers roads with less than 10,000 vehicles per day “minor, low-impact” sources that do not pose a significant health impact even in combination with other nearby sources and recommends that these sources be excluded from the environmental analysis. Implementation of the HCSMP would not result in new vehicle trips, therefore an assessment of project-generated TACs resulting from vehicle trips is not required, and the proposed project would not generate a substantial amount of TAC emissions that could affect nearby sensitive receptors. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Siting Sensitive Land Uses

As discussed above, San Francisco, in partnership with the BAAQMD, has modeled and assessed air pollutant impacts from mobile, stationary and area sources within the City. This assessment has resulted in the identification of air pollutant hot spots. The proposed project, as a policy document, would not site sensitive land uses. Therefore, the proposed project would result in a less-than-significant impact with respect to exposing sensitive receptors to substantial levels of air pollution. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact AQ-5: Implementation of the HCSMP would not conflict with or obstruct implementation of an applicable air quality plan. (Less than Significant)

On September 15, 2010, the BAAQMD adopted the 2010 Bay Area Clean Air Plan.⁴⁴ The 2010 Clean Air Plan updates the Bay Area 2005 Ozone Strategy 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 GHGs in a single, integrated plan; and establish emission control measures to be adopted or implemented in the 2010 through 2012 timeframe. The primary goals of the 2010 Clean Air Plan are to

- attain air quality standards;

⁴⁴ BAAQMD, Bay Area 2010 Clean Air Plan, Adopted September 15, 2010. Available online at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>. Accessed June 23, 2013.

- reduce population exposure and protecting public health in the San Francisco Bay Area; and,
- reduce GHG emissions and protect the climate.

BAAQMD's approach for determining plan-level consistency with these goals is determined by considering 1) the primary goals of the 2010 Clean Air Plan, 2) the consistency with the 55 control measures listed in the 2010 Clean Air Plan and 3) whether the project in question would hinder implementation of the 2010 Clean Air Plan.

The San Francisco General Plan includes an Air Quality Element that includes policies to reduce the level of air pollutants and to improve the public health and quality of life of the people of San Francisco. These policies are as follows:

- Adhere to state and federal ambient air quality standards and programs and reduce mobile sources of air pollution through implementation of the transportation element of the General Plan;
- Decrease the air quality impacts of development by coordinating land use and transportation decisions;
- Improve air quality by increasing public awareness of the negative health effects of pollutants generated by stationary and mobile sources;
- Minimize particulate matter emissions from road and construction sites; and
- Link the positive effects of energy conservation and waste management to maintain reductions.

The HCSMP recommendations and guidelines would not conflict with the primary goals of the 2010 Clean Air Plan, existing Air Quality Element's goals or other policies in the General Plan's other elements.

The BAAQMD CEQA Guidelines state: "Plans are the appropriate place to establish community-wide air quality policies that reinforce regional air quality plans. Plans present opportunities to establish requirements for new construction, future development, and redevelopment projects within a community that will ensure new or revised plans do not inhibit attainment of state and national air quality standards and actually assist in improving local and regional air quality." This analysis focuses on the BAAQMD's measures that are applicable to the HCSMP – some measures, like those related to activity centers, parking, solid waste, community forestry, etc. do not relate to health care planning and are not included in the consistency analysis. Table 5 lists BAAQMD measures that correlate to HCSMP recommendations and policies.

Table 5: Feasible Measures to Reduce Air Quality Effects and HCSMP Recommendations and Guidelines

Subject Area	BAAQMD Recommended Measures	Corresponding CSE Update Policy
Urban Form	Create and enhance landscaped greenway, trail, and sidewalk connections between neighborhoods, commercial areas, activity centers, and parks.	Guideline 2.1.1: Support the expansion of networks of open spaces, small urban agriculture, and physical recreation facilities, including the network of safe walking and biking facilities.
Urban Form	Ensure that proposed land uses are supported by a multi-modal transportation system and that the land uses themselves support the development of the transportation system.	Recommendation 3.5: Ensure that San Francisco residents – particularly those without regular car access – have available a range of appropriate transportation options (e.g., public transportation, shuttle services, bike lanes, etc.) that enable them to reach their health care destinations safely, affordably, and in a timely manner.
Green Economy and Businesses	Work with businesses to encourage employee transit subsidies and shuttles from transit stations	Guideline 3.5.4: Provide transportation options (e.g., taxi vouchers, shuttles, other innovative transportation options, etc.) from low-income areas and areas with documented high rates of health disparities – particularly those with transportation access barriers – to health care facilities.
Local Circulation	Actively promote walking as a safe mode of local travel, particularly for children attending local schools.	Guideline 3.5.7: Promote ongoing collaboration with MTA and San Francisco County Transportation Authority staff to consider pedestrian safety near health care facilities as well as how safety may be impacted by ongoing transportation planning and projects.
Regional Transportation	Adopt a (or implement the existing) Transportation Demand Management Ordinance.	Guideline 3.5.3: As part of transit demand management efforts for patients, develop safe health care transit options beyond the public transportation system (e.g., bike storage, health care facility shuttle service, etc.) to increase health care access for those without regular car access.
Regional Transportation	Consult with appropriate transportation agencies and major employers to establish express buses and vanpools to increase the patronage of park and ride lots.	Guideline 3.5.1: Support the recommendations of the Municipal Transportation Agency's (MTA) Transit Effectiveness Project, which is expected to positively impact passenger travel times on high ridership routes, including those that service San Francisco's major health care facilities.
Bicycles and Pedestrians	Provide safe and convenient pedestrian and bicycle connections to and from activity centers, commercial districts, offices, neighborhoods, schools, other major activity centers.	Guideline 2.1.1: Support the expansion of networks of open spaces, small urban agriculture, and physical recreation facilities, including the network of safe walking and biking facilities.
Bicycles and Pedestrians	Provide pedestrian pathways that are well-shaded and pleasantly landscaped to encourage use.	Recommendation 2.1: Support "healthy" urban growth.
Bicycles and Pedestrians	Prohibit projects that impede bicycle and walking access.	Guideline 2.1.3: Encourage residential and mixed-use projects to incorporate healthy design – design encouraging walking and safe pedestrian environments.

Local and Regional Bus Transit	Establish a local shuttle service to connect neighborhoods, commercial centers, and public facilities to rail transit.	Guideline 3.5.3: As part of transit demand management efforts for patients, develop safe health care transit options beyond the public transportation system (e.g., bike storage, health care facility shuttle service, etc.) to increase health care access for those without regular car access.
Local and Regional Bus Transit	Empower seniors and those with physical disabilities who desire maximum personal freedom and independence of lifestyle with unimpeded access to public transportation.	Guideline 2.1.2: Review the impact of large-scale residential and mixed-use development projects – and/or expected areas of new growth – on the potential impact on neighborhood residents' future health care needs and, when feasible, such projects should address service connectivity. Projects serving seniors, persons with disabilities, or other populations with limited mobility options, for example, should employ a range of transportation demand management strategies (e.g., shuttle service, gurney service) to address the project's impact and utility for the community.
Parks and Recreation	Expand and improve community recreation amenities including parks, pedestrian trails and connections to regional trail facilities.	Guideline 1.1.2: Advance health promotion, disease prevention, and overall community wellness (e.g., publicly accessible open space, gyms that provide and facilitate access to underserved populations, exercise areas with equipment and classes/wellness programs that are included as part of development proposals).
Affordable Housing	Ensure a portion of future residential development is affordable to low and very low income households.	Guideline 1.1.4: Continue to support the expansion of permanent supportive housing and other affordable, safe housing options that have robust connections to health care facilities and services and to wellness opportunities. Guideline 3.3.1: Support affordable and supportive housing options for seniors and persons with disabilities, enabling them to live independently in the community

The HCSMP and its implementing measures would not cause the disruption, delay or otherwise hinder the implementation of the 2010 Clean Air Plan. The HCSMP would be, on balance, consistent with applicable BAAQMD control measures. In terms of GHG emissions, the City and County has adopted an ordinance which implements citywide "Strategies to Reduce Greenhouse Gas Emissions." As discussed further under topic E.8, Greenhouse Gas Emissions, the HCSMP would not conflict with the CAP's overarching goal to "reduce GHG emissions and protect the climate." As such, the HCSMP would not conflict with or obstruct implementation of the 2010 Clean Air Plan. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact AQ-6: Implementation of the HCSMP would not create objectionable odors that would affect a substantial number of people. (Less than Significant)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. As a policy document, implementation of the HCSMP would not create significant sources of new odors, and therefore, odor impacts would be less than significant. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Cumulative Air Quality Impacts

Impact C-AQ-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future development in the project area would result in less-than-significant cumulative air quality impacts. (Less than Significant)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.⁴⁵ The project-level thresholds for criteria air pollutants are based on levels by 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, because the proposed project's construction (Impact AQ-1) and operational (Impact AQ-3) emissions would not exceed the project-level thresholds for criteria air pollutants, the proposed project would not be considered to result in a cumulatively considerable contribution to regional air quality impacts. In addition, the proposed project would not directly result in new vehicle trips and therefore the project would not contribute substantially to cumulative TAC emissions that could affect nearby sensitive land uses. Therefore, cumulative air quality impacts would be considered less than significant.

⁴⁵ BAAQMD, *CEQA Air Quality Guidelines*, May 2011, page 2-1.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG's has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

While the presence of the primary GHGs in the atmosphere are naturally occurring, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO₂E).⁴⁶

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.⁴⁷

The Air Resources Board (ARB) estimated that in 2006 California produced about 484 million gross metric tons of CO₂E (MMTCO₂E), or about 535 million U.S. tons.⁴⁸ The ARB found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 22 percent and industrial sources at 20 percent.

⁴⁶ Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

⁴⁷ California Climate Change Portal. Frequently Asked Questions About Global Climate Change. Available online at: <http://www.climatechange.ca.gov/publications/faqs.html>. Accessed November 8, 2010.

⁴⁸ California Air Resources Board (ARB), "California Greenhouse Gas Inventory for 2000-2006— by Category as Defined in the Scoping Plan." http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_2009-03-13.pdf. Accessed March 2, 2010.

Commercial and residential fuel use (primarily for heating) accounted for 9 percent of GHG emissions.⁴⁹ In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) and the industrial and commercial sectors are the two largest sources of GHG emissions, each accounting for approximately 36% of the Bay Area's 95.8 MMTCO₂E emitted in 2007.⁵⁰ Electricity generation accounts for approximately 16% of the Bay Area's GHG emissions followed by residential fuel usage at 7%, off-road equipment at 3% and agriculture at 1%.⁵¹

Regulatory Setting

In 2006, the California legislature passed Assembly Bill No. 32 (California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business as usual emissions levels, or about 15 percent from today's levels.⁵² The Scoping Plan estimates a reduction of 174 million metric tons of CO₂E (MMTCO₂E) (about 191 million U.S. tons) from the transportation, energy, agriculture, forestry, and high global warming potential sectors, see Table 6, below. ARB has identified an implementation timeline for the GHG reduction strategies in the Scoping Plan.⁵³ Some measures may require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Additionally, some emissions reductions strategies may require their own environmental review under CEQA or the National Environmental Policy Act (NEPA).

⁴⁹ Ibid.

⁵⁰ Bay Area Air Quality Management District, Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010. Available online at: http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ashx. Accessed June 24, 2013.

⁵¹ Ibid.

⁵² California Air Resources Board, California's Climate Plan: Fact Sheet. Available online at: http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed June 24, 2013.

⁵³ California Air Resources Board. AB 32 Scoping Plan. Available Online at: http://www.arb.ca.gov/cc/scopingplan/sp_measures_implementation_timeline.pdf. Accessed June 24, 2013.

Table 6. GHG Reductions from the AB 32 Scoping Plan Sectors⁵⁴

GHG Reduction Measures By Sector	GHG Reductions (MMT CO ₂ E)
Transportation Sector	62.3
Electricity and Natural Gas	49.7
Industry	1.4
Landfill Methane Control Measure (Discrete Early Action)	1
Forestry	5
High Global Warming Potential GHGs	20.2
Additional Reductions Needed to Achieve the GHG Cap	34.4
Total	174
Other Recommended Measures	
Government Operations	1.2
Agriculture- Methane Capture at Large Dairies	1
Methane Capture at Large Dairies	1
Additional GHG Reduction Measures	
Water	4.8
Green Buildings	26
High Recycling/ Zero Waste	
• Commercial Recycling	
• Composting	
• Anaerobic Digestion	9
• Extended Producer Responsibility	
• Environmentally Preferable Purchasing	
Total	42.8-43.8

AB 32 also anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from current levels for local governments themselves and notes that successful implementation of the plan relies on local governments' land use planning and urban growth decisions because local governments have primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.

The Scoping Plan relies on the requirements of Senate Bill 375 (SB 375) to implement the carbon emission reductions anticipated from land use decisions. SB 375 was enacted to align local land use and transportation planning to further achieve the State's GHG reduction goals. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs), to incorporate a "sustainable communities strategy" in their regional transportation plans (RTPs) that would achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 would be implemented over the next several years and the Metropolitan Transportation Commission's 2013 RTP would be its first plan subject to SB 375.

Senate Bill 97 (SB 97) required the Office of Planning and Research (OPR) to amend the state CEQA guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs. In response, OPR amended the CEQA guidelines to provide guidance for analyzing GHG emissions. Among other changes to the CEQA Guidelines, the amendments add a new section to

⁵⁴ Ibid.

the CEQA Checklist (CEQA Guidelines Appendix G) to address questions regarding the project's potential to emit GHGs.

The Bay Area Air Quality Management District (BAAQMD) is the primary agency responsible for air quality regulation in the nine county San Francisco Bay Area Air Basin (SFBAAB). As part of their role in air quality regulation, BAAQMD has prepared the CEQA air quality guidelines to assist lead agencies in evaluating air quality impacts of projects and plans proposed in the SFBAAB. The guidelines provide procedures for evaluating potential air quality impacts during the environmental review process consistent with CEQA requirements. On June 2, 2010, the BAAQMD adopted new and revised CEQA air quality thresholds of significance and issued revised guidelines that supersede the 1999 air quality guidelines. The *2010 CEQA Air Quality Guidelines* provide for the first time CEQA thresholds of significance for greenhouse gas emissions. OPR's amendments to the CEQA Guidelines as well as BAAQMD's *2010 CEQA Air Quality Guidelines* and thresholds of significance have been incorporated into this analysis accordingly.

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

The most common GHGs resulting from human activity are CO₂, CH₄, and N₂O.⁵⁵ State law defines GHGs to also include hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These latter GHG compounds are usually emitted in industrial processes, and therefore not applicable to the proposed project. Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers, energy required to pump, treat, and convey water, and emissions associated with landfill operations.

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. The HCSMP could lead to construction activities associated with Guideline 1.1.4 to "Continue to support the expansion of permanent supportive housing and other affordable, safe housing options that have robust connections to health care facilities and services and to wellness opportunities;" Guideline 2.1.1 to "Support the expansion of networks of open spaces, small urban agriculture, and physical recreation facilities, including the network of safe walking and biking facilities;" Guideline 2.1.3 to "Encourage residential and mixed-use projects to incorporate healthy design – design encouraging walking and safe pedestrian environments;"

⁵⁵ Governor's Office of Planning and Research. *Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. June 19, 2008. Available at the Office of Planning and Research's website at: <http://www.opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf>. Accessed June 23, 2013.

Recommendation 3.1 to “Increase access to appropriate care for San Francisco’s vulnerable populations;” and Guideline 3.3.1 to “Support affordable and supportive housing options for seniors and persons with disabilities, enabling them to live independently in the community.” The HCSMP could therefore contribute to annual long-term increases in GHGs as a result of operations associated with energy use, water use and wastewater treatment, and solid waste disposal. Construction activities of future projects that could be developed in the context of the HCSMP would also result in an increase in GHG emissions.

As discussed above, the BAAQMD has adopted CEQA thresholds of significance for projects that emit GHGs, one of which is a determination of whether the proposed project is consistent with a Qualified Greenhouse Gas Reduction Strategy, as defined in the *2010 CEQA Air Quality Guidelines*. On August 12, 2010, the San Francisco Planning Department submitted a draft of the City and County of San Francisco’s *Strategies to Address Greenhouse Gas Emissions* to the BAAQMD.⁵⁶ This document presents a comprehensive assessment of policies, programs and ordinances that collectively represent San Francisco’s Qualified Greenhouse Gas Reduction Strategy in compliance with the BAAQMD’s *2010 CEQA Air Quality Guidelines* and thresholds of significance.

San Francisco’s GHG reduction strategy identifies a number of mandatory requirements and incentives that have measurably reduced greenhouse gas emissions including, but not limited to, increasing the energy efficiency of new and existing buildings, installation of solar panels on building roofs, implementation of a green building strategy, adoption of a zero waste strategy, a construction and demolition debris recovery ordinance, a solar energy generation subsidy, incorporation of alternative fuel vehicles in the City’s transportation fleet (including buses and taxis), and a mandatory composting ordinance. The strategy also identifies 42 specific regulations for new development that would reduce a project’s GHG emissions.

San Francisco’s climate change goals as are identified in the 2008 Greenhouse Gas Reduction Ordinance as follows:

- By 2008, determine the City’s 1990 GHG emissions, the baseline level with reference to which target reductions are set;
- Reduce GHG emissions by 25 percent below 1990 levels by 2017;
- Reduce GHG emissions by 40 percent below 1990 levels by 2025; and
- Reduce GHG emissions by 80 percent below 1990 levels by 2050.

The City’s 2017 and 2025 GHG reduction goals are more aggressive than the State’s GHG reduction goals as outlined in AB 32, and consistent with the State’s long-term (2050) GHG reduction goals. San Francisco’s *Strategies to Address Greenhouse Gas Emissions* identifies the City’s actions to pursue cleaner energy, energy conservation, alternative transportation and solid waste policies, and concludes that San Francisco’s policies have resulted in a reduction in greenhouse gas emissions below 1990 levels, meeting statewide AB 32 GHG reduction goals. As reported, San

⁵⁶ San Francisco Planning Department. *Strategies to Address Greenhouse Gas Emissions in San Francisco*. 2010. The final document is available online at: <http://www.sfplanning.org/index.aspx?page=1570>.

San Francisco's 1990 GHG emissions were approximately 8.26 million metric tons (MMT) CO₂E and 2005 GHG emissions are estimated at 7.82 MMTCO₂E, representing an approximately 5.3 percent reduction in GHG emissions below 1990 levels.

The BAAQMD reviewed San Francisco's *Strategies to Address Greenhouse Gas Emissions* and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy as outlined in BAAQMD's CEQA Guidelines (2010) and stated that San Francisco's "aggressive GHG reduction targets and comprehensive strategies help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn."⁵⁷

Based on the BAAQMD's 2010 *CEQA Air Quality Guidelines*, projects that are consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions* would result in a less than significant impact with respect to GHG emissions. Furthermore, because San Francisco's strategy is consistent with AB 32 goals, projects that are consistent with San Francisco's strategy would also not conflict with the State's plan for reducing GHG emissions. As discussed in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, new development and renovations/alterations for private projects and municipal projects are required to comply with San Francisco's ordinances that reduce greenhouse gas emissions.

Depending on a proposed project's size, use, and location, a variety of controls are in place to ensure that a proposed project would not impair the State's ability to meet statewide GHG reduction targets outlined in AB 32, nor impact the City's ability to meet San Francisco's local GHG reduction targets. Given that: (1) San Francisco has implemented regulations to reduce greenhouse gas emissions specific to new construction and renovations of private developments and municipal projects; (2) San Francisco's sustainable policies have resulted in the measured success of reduced greenhouse gas emissions levels; (3) San Francisco has met and exceeded AB 32 greenhouse gas reduction goals for the year 2020; (4) current and probable future state and local greenhouse gas reduction measures will continue to reduce a project's contribution to climate change; and (5) San Francisco's *Strategies to Address Greenhouse Gas Emissions* meet BAAQMD's requirements for a Qualified GHG Reduction Strategy, projects that are consistent with San Francisco's regulations would not contribute significantly to global climate change. The HCSMP and any subsequent future projects proposed in the context of the HCSMP would be required to comply with these requirements. The HCSMP was determined to be consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*. As such, the HCSMP would result in a less than significant impact with respect to GHG emissions.

⁵⁷ Letter from Jean Roggenkamp, BAAQMD, to Bill Wycko, San Francisco Planning Department. October 28, 2010. This letter is available online at: <http://www.sfplanning.org/index.aspx?page=1570>. Accessed November 12, 2010.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
9. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact WS-1: Implementation of the HCSMP would not alter wind in a matter that substantially affects public areas. (Less than Significant)

Wind impacts are generally caused by large building masses extending substantially above neighboring buildings, and by buildings oriented such that a new large wall catches a prevailing wind, particularly if such a wall contains little or no articulation. Average wind speeds in San Francisco are greatest in summer and least in the fall. Winds also exhibit a diurnal variation with the strongest winds occurring in the afternoon and the lightest winds occurring in the early morning. Winds in the City occur most frequently from the west to northwest directions, reflecting the persistence of sea breezes. Wind direction is most variable in the winter.⁵⁸ The approach of winter storms often results in southerly winds. Although not as frequent as westerly winds, these southerly winds are often strong. The strongest winds in the City are typically from the south during the approach of a winter storm.

Winds vary at pedestrian levels within a city. In San Francisco wind strength is generally greater, on average, along streets that run east-west as buildings tend to channel westerly winds along these streets.⁵⁹ Streets running north-south tend to have lighter winds, on average, due to the shelter offered by buildings on the west side of the street. Within the City, the streets systems north of Market Street and portions of the systems south of Market Street (including those in the Mission District, Potrero Hill, Mission Bay, and Central Waterfront) are mainly on a north/south and east/west grid. However, portions of the street systems south of Market Street (including those in South of Market, South Beach, Bayview Hunters Point, and Visitacion Valley) are mainly northwest/southeast and southwest/northeast, which results in a less predictable pattern of wind variation at the pedestrian level.

New construction could result in wind impacts if future buildings were constructed in a manner that would increase ground-level wind speeds. Typically, new development greater than 85 feet in height could potentially affect ground level wind speeds. Buildings that would result in wind speeds that exceed the hazard criterion of 26 miles per hour (mph) for one hour of the year would result in a significant wind impact.

The Planning Department evaluates potential wind impacts on a project-level basis, and generally evaluates wind effects by using the wind hazard criterion to determine CEQA significance. Any new building or addition that would cause wind speeds to exceed the hazard level of 26-mph-equivalent wind speed (as defined in the Planning Code) more than one hour of

⁵⁸ *Market and Octavia Neighborhood Plan Final EIR*, page 4-14, adopted September 2007. This document is available for review at the Planning Department as part of Case File No. 2003.0347E

⁵⁹ *Ibid.*

any year must be modified and is subject to the relevant wind hazard criterion.⁶⁰ Buildings below 85 feet generally do not have the potential to affect wind speeds. Buildings that extend in height above surrounding development have more impact than those of similar height to surroundings. HCSMP recommendations and guidelines do not include any policy that could in and of itself result in adverse wind effects, and as a policy document, no specific projects are proposed at this time. Therefore, implementation of the HCSMP would result in less-than-significant effects related to wind. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact WS-2: Implementation of the HCSMP would not create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas. (Less than Significant)

Section 295 of the Planning Code was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Parks Department by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant.

In general, all applications for new construction or additions to existing buildings above 40 feet in height must be reviewed to determine whether a project would cast additional shadows on properties under the jurisdiction of, or designated to be acquired by the Recreation and Park Department. In this case, the Planning Department develops a “shadow fan” diagram that shows the maximum extent of the shadows cast by a proposed building throughout the year, between one hour after sunrise and one hour before sunset. If the shadow fan indicates a project shadow does not reach any property protected by Planning Code Section 295 (the sunlight ordinance), no further review is required. If the shadow fan shows that a project has potential to shade such properties, further analysis is required.

Moreover, the Planning Code regulates sunlight access on particular downtown street segments during certain daytime hours. Specifically, Planning Code Section 146(a) includes sunlight access criteria to allow direct sunlight to reach sidewalk areas of designated streets during critical hours of the day. In the case of sidewalks, the critical hours are considered to be midday hours. The Code designates 18 streets within the project area (all near the Downtown) as subject to Section 146(a). Individual projects within downtown must comply with Section 146(a) requirements, or obtain an allowable exception under Section 309 of the Planning Code.

Planning Code Section 146(c) includes sunlight access criteria to reduce substantial shadow impacts on public sidewalks in the C-3 Districts other than those protected by Section 146(a). New buildings and additions to existing structures must minimize any substantial shadow impacts in the C-3 (Downtown) Districts not protected under Subsection (a), as long as this can be accomplished without the creation of unattractive building design and the undue restriction of development potential. Planning Code Section 147 states that new buildings and additions to existing buildings in C-3, South of Market Mixed Use, and Eastern Neighborhoods Mixed Use

⁶⁰ “Equivalent wind speed” is defined as an hourly mean wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians. San Francisco Planning Code Section 148(b).

Districts where the building height exceeds 50 feet shall be shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site in question, to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section 295.

The HCSMP does not include any recommendation or guideline that could in and of itself result in adverse shadow effects, and as a policy document, no specific projects are proposed at this time. Therefore, the proposed HCSMP would not create shadow in a manner "that substantially affects outdoor recreation facilities or other public areas." Implementation of the HCSMP would result in less-than-significant effects related to shadow. The potential for adverse shadow effects would be assessed in conjunction with the particular proposal. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-WS-1: Implementation of the HCSMP, in combination with other past, present or reasonably foreseeable projects would not result in less-than-significant wind and shadow impacts. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would result in less-than-significant shadow and wind impacts and would not contribute considerably to adverse shadow and wind effects under cumulative conditions. For the reasons discussed above, the proposed project's impacts related to shadow and wind, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
10. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact RE-1: Implementation of the HCSMP would not cause substantial physical deterioration of citywide parks or otherwise physically degrade existing recreational resources. (Less than Significant)

Over time, projected citywide growth in residential population and jobs may increase the use of existing parks and recreational facilities. In response to anticipated demands for park and

recreational amenities, the San Francisco Planning Department is currently updating the Recreation and Safety Element (ROSE) of the General Plan. The draft ROSE Update includes Policy 2.1, which states that the City should “Prioritize acquisition of open space in high needs areas.” This policy is similar to existing ROSE Policies 2.1 (“Provide an adequate total quantity and equitable distribution of public open spaces throughout the City.”); 2.7 (“Acquire additional open space for public use.”) and 4.4 (“Acquire and develop new public open space in existing residential neighborhoods, giving priority to areas which are most deficient in open space.”).

Out of concern for the maintenance conditions of parks, in 2003 San Francisco voters adopted Proposition C, which required the Recreation and Park Department to adopt maintenance standards for all the parks under their jurisdiction in the City. In early 2007, the Recreation and Park Department completed its first system-wide assessment of the physical condition of its park properties and facilities. This assessment, called COMET, was conducted by an independent, third-party engineering firm. Through the assessment, each park property and facility was reviewed and structural deficiencies and deferred maintenance needs were noted. The findings of the assessment indicated a need for ongoing capital investments. Per the standards, the citywide average score for a park, rated on over 80 elements, has increased from 81 percent in FY2005-06 to 90 percent in FY2009-10. These standards only apply to Recreation and Park Department owned properties.⁶¹

The 2008 Clean & Safe Bond Report states: “Although the park scores reflect significant improvement regarding general upkeep, the maintenance standards do not address a number of aspects of a park that impact the user’s experience. For example, the current standards do not cover the availability and modernity of amenities such as restrooms, recreation centers, and children’s play areas. These, more capital-oriented issues, should be evaluated in a systematic way, either through revised standards or another approach, to determine how best to manage them.”

The HCSMP is a policy document that consists of recommendations and guidelines that would improve health and health care services. As stated in Guideline 1.1.2, the HCSMP would “Advance health promotion, disease prevention, and overall community wellness (e.g., publicly accessible open space, gyms that provide and facilities access to underserved populations, exercise areas with equipment and classes/wellness programs that are included as part of development proposals).” In addition, Guideline 2.1.1 calls for the City to “Support the expansion of networks of open spaces, small urban agriculture, and physical recreation facilities, including the network of safe walking and biking facilities.” The HCSMP would not directly physically degrade any recreational resources citywide, and as such, implementation of the HCSMP would result in less-than-significant physical impacts to recreational resources, both individually and cumulatively. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

⁶¹ 2008 Clean & Safe Bond Report, pp. 25-55, San Francisco Recreation and Parks Department, 2008. This document is available for review at the Planning Department in Case File 2010.0641E.

Impact RE-2: The HCSMP does not entail construction or expansion of recreational facilities that might have an adverse physical effect on the environment. (No Impact)

The HCSMP is a policy document that includes program-level concepts for improvement of San Francisco's health care system. As described in the project description of this Initial Study, no specific projects that would result in a physical effect on the environment are proposed. Future projects resulting from the HCSMP will be subject to project-specific environmental review, in order to evaluate the potential of the specific undertaking to have an adverse physical effect on the environment. However, the policies included in the HCSMP are not expected to result in adverse physical environmental impacts. Therefore, implementation of the HCSMP would have a less-than-significant impact on recreational facilities, both individually and cumulatively. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-RE-1: Implementation of the HCSMP, in combination with past, present, and reasonable foreseeable future projects, would not considerably contribute to recreational impacts in the project site vicinity. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. As stated above, implementation of the HCSMP would not noticeably increase the use of existing neighborhood parks or other recreation facilities; would not require the construction of recreational facilities; and would not physically degrade existing recreation facilities. Furthermore, the contribution of the proposed project to cumulative recreation-related impacts would not be considerable. For the reasons discussed above, the proposed project's impacts related to recreation, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
11. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact UT-1: Implementation of the HCSMP would not exceed wastewater treatment facilities, exceed the capacity of the wastewater treatment provider serving the project, or result in the construction of new stormwater drainage facilities or expansion of existing facilities. (No Impact)

The City and County require National Pollutant Discharge Elimination System (NPDES) permits, as administered by the San Francisco Bay Regional Water Quality Control Board (RWQCB), according to federal regulations for both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the United States. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

As a policy document, no specific projects are proposed at this time. However, future projects that would result in the context of the HCSMP would be required to comply with all provisions of the NPDES program, as enforced by the RWQCB. Therefore, the proposed HCSMP would not directly result in an exceedance of wastewater treatment requirements. Additionally, the NPDES Phase I and Phase II requirements would regulate discharge from construction sites. Future development would be required to comply with all applicable wastewater discharge requirements issued by the State Water Resources Control Board (SWRCB) and RWQCB. The HCSMP recommendations and guidelines would also not conflict with the City's Green Building Ordinance. This ordinance addresses stormwater management by seeking to reduce impervious cover, promote infiltration, and capture and treat 90 percent of the runoff from an average annual rainfall event using acceptable Best Management Practices.

Moreover, subsequent projects would also be subject to the Stormwater Management Ordinance (SMO), which became effective on May 22, 2010. This ordinance requires that any project resulting in a ground disturbance of 5,000 square feet or greater prepare a Stormwater Control Plan (SCP), consistent with the November 2009 Stormwater Design Guidelines (SDG). Responsibility for approval of the SCP is with the SFPUC Wastewater Enterprise, Urban Watershed Management Program (UWMP); or if a project is located on Port of San Francisco property, with the Port. The ordinance requires compliance with the Stormwater Design Guidelines (SDG).

As per the requirements of the SDG, projects must achieve the performance requirements of LEED Sustainable Sites (SS) c6.1, "Stormwater Design: Quantity Control," which require implementation of stormwater management approaches to prevent stormwater runoff flow rate and volume from exceeding existing conditions for the one- and two-year 24-hour design storm. For projects with impervious areas greater than 50 percent, a stormwater management approach must be implemented that reduces existing stormwater runoff flow rate and volume by 25 percent for a two-year 24-hour design storm. Projects are required to minimize disruption of natural hydrology by implementing Low Impact Design approaches such as reduced impervious cover, reuse of stormwater, or increased infiltration. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities.

The San Francisco Public Utilities Commission (SFPUC) is currently developing a Sewer System Master Plan to address anticipated infrastructure issues, to meet anticipated regulatory requirements, as well as to accommodate planned growth. Projections for sewer service demand were assessed to 2030 to determine future population, flows, and loads based on 1) population information provided by the Association of Bay Area Governments and accepted by the Planning Department; 2) flows projected by the SFPUC based on water usage within the city; and 3) flows projected by the outside agencies that are discharging into San Francisco's sewer system based on agreements made with the U.S. Environmental Protection Agency during the grants programs of the 1970s and 1980s. Implementation of the HCSMP would not conflict with the Sewer System Master Plan nor would be expected to exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City. Therefore, the implementation of the HCSMP would have no impact with respect to the exceedance of wastewater treatment requirements.

Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact UT-2: The City and County projects that there are sufficient water supplies and entitlements to serve anticipated citywide population growth, and implementation of the HCSMP would not require expansion or construction of new water treatment facilities. (Less than Significant)

The SFPUC provides an average of approximately 265 million gallons per day (mgd) of water to approximately 2.5 million people in San Francisco, Santa Clara, Alameda, San Mateo, and Tuolumne Counties.⁶² Approximately 96 percent of the water provided to San Francisco is supplied by the SFPUC Regional Water System, which is made up of water from the Hetch Hetchy Reservoir and Bay Area reservoirs in the Alameda Creek and Peninsula watersheds.⁶³ The project site is currently served by this adequate water delivery infrastructure.

⁶² San Francisco Public Utilities Commission (SFPUC). 2010 Urban Water Management Plan, which includes county-wide demand projections through the year 2035, and compares water supply and demand. Available online at: <http://www.sfwater.org/Modules/ShowDocument.aspx?documentID=1055>, accessed May 7, 2013; and SFPUC, 2013 Water Availability Study for the City and County of San Francisco. Available online at: <http://www.sfsewers.org/modules/showdocument.aspx?documentid=3589>, accessed June 14, 2013.

⁶³ SFPUC. 2010 *Urban Water Management Plan for the City and County of San Francisco*. pp. 22-25. Groundwater and recycled water make up the remainder of the SFPUC supplies to the City.

Future projects in the context of the HCSMP could incrementally increase the demand for water in San Francisco; however, the increase in water demand would not be in excess of the projected demand for the project area and City as a whole.⁶⁴ All future projects proposed in the context of the HCSMP would be designed to incorporate water-conserving measures as required by Title 24 of the California Code of Regulations (CCR), the Building Code.

The 2010 Urban Water Management Plan for the City and County of San Francisco (UWMP) projects that, during normal precipitation years, the SFPUC will have adequate supplies to meet projected demand. During multiple dry years, however, additional water sources will be required. To address this issue, the SFPUC initiated the multi-year program Water System Improvement Program (WSIP) to rebuild and upgrade the water system and is currently implementing the WSIP to provide improvements to its water infrastructure.

The San Francisco Green Landscaping Ordinance (No. 84-10) was adopted on April 22, 2010 and applies to new development projects and projects involving significant alternation. The ordinance requires landscaping of publicly visible areas and rights-of-way including front yards, parking lot perimeters, and pedestrian walkways, as well as screening of parking and vehicular use areas. The ordinance also requires compliance with San Francisco Administrative Code Chapter 63, which applies to property owners requesting a new irrigation water service meter with a landscape area of 1,000 square feet or larger. The goals of the Green Landscaping Ordinance include the following: healthier and more plentiful plantings through screening, parking lot, and street tree controls; increased permeability through front yard and parking lot controls; encourage responsible water use through increasing "climate appropriate" plantings; and improved screening by creating an ornamental fencing requirement and requiring screening for newly defined "vehicle use areas."⁶⁵

San Francisco's Water Efficient Irrigation Ordinance (Chapter 63 of the Administrative Code) requires that landscape projects be installed, constructed, operated, and maintained in accordance with rules adopted by the SFPUC that establish a water budget for outdoor water consumption. A Maximum Applied Water Allowance, or water budget, is calculated for each landscape project and provides the project applicant with the appropriate amount of water that may be used to irrigate their landscape area. The requirements apply to public agencies and owners of residential, commercial, and mixed use properties with new construction landscape projects or rehabilitated landscape projects. If there are no plans to modify or improve the property's existing landscape or if the improvement areas are less than 1,000 square feet over a one year period, landscape documentation does not need to be submitted to the SFPUC; however, water efficient landscaping practices are encouraged. All landscapes are still subject to water waste prevention provisions. Different compliance mechanisms are applied based on the square footage of the new or rehabilitated landscape area.

The City also has adopted recycled water ordinances (Nos. 390-91, 391-91, 393-94) which require property owners, including municipal property owners, to install recycled water systems for recycled water use within designated recycled water use areas under the following

⁶⁴ The 2010 Urban Water Management Plan for the City and County of San Francisco, pp. 66-69, projects that, during normal precipitation years and multiple dry years, the SFPUC will have adequate supplies to meet projected demand through 2035.

⁶⁵ *Complying with San Francisco's Water Efficient Irrigation Requirements*, SF PUC, January 2011. This document is available for review on line at: <http://sfwater.org/Modules/ShowDocument.aspx?documentID=731>.

circumstances: new or remodeled buildings and all subdivisions with a total cumulative area of 40,000 square feet or more or new and existing irrigated areas of 10,000 square feet or more. Non-potable recycled water is also required for soil and compaction and dust control activities during project construction (Ordinance 175-91). The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

In sum, according to the Urban Water Management Plan, projected growth in residential and commercial sectors, would be accommodated by current and future water supplies through 2030. The HCSMP would not require expansion or construction of new water treatment facilities to meet anticipated needs. Further, the HCSMP recommendations and guidelines would not conflict with existing ordinances that have been adopted to address water conservation. Therefore, effects on water supply and wastewater treatment facilities would be less than significant. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact UT-3: Implementation of the HCSMP would not to substantially affect landfill capacity or conflict with the City's current disposal agreement. (Less than Significant)

Recology (formerly Norcal Waste Systems, Inc.) provides solid waste collection, recycling, and disposal services for residential and commercial garbage and recycling in San Francisco through its subsidiaries San Francisco Recycling and Disposal, Golden Gate Disposal and Recycling, and Sunset Scavenger.

San Francisco uses a three-cart collection program: residents and businesses sort solid waste into recyclables, compostable items such as food scraps and yard trimmings, and garbage. All materials are taken to the San Francisco Solid Waste Transfer and Recycling Center, located at 501 Tunnel Avenue in southeast San Francisco. There, the three waste streams are sorted and bundled for transport to the composting and recycling facilities and the landfill. San Francisco has created a large-scale urban program for collection of compostable materials. Food scraps and other compostable material collected from residences, restaurants, and other businesses are sent to Recology's Jepson-Prairie composting facility, located in Solano County. Food scraps, plant trimmings, soiled paper, and other compostables are turned into a nutrient-rich soil amendment, or compost. Recyclable materials are sent to Recycle Central, located at Pier 96 on San Francisco's southern waterfront, where they are separated into commodities and sold to manufacturers that turn the materials into new products. Waste that is not composted or recycled is taken to the Altamont Landfill, which is located east of Livermore in Alameda County.

The Altamont Landfill is a regional landfill that handles residential, commercial, and construction waste. It has a permitted maximum disposal of about 11,500 tons per day and received about 1.29 million tons of waste in 2007 (the most recent year reported by the State).⁶⁶ In 2007, the waste contributed by San Francisco (approximately 628,914 tons) represented approximately 49 percent

⁶⁶ California Department of Resources Recycling and Recovery (CalRecycle), "Facility/Site Summary Details: Altamont Landfill & Resource Recovery (01-AA-0009)" (hereinafter referred to as "Facility/Site Summary Details"). Available online at <http://www.calrecycle.ca.gov/SWFacilities>. Accessed June 24, 2013.

of the total volume of waste received at this facility. The remaining permitted capacity of the landfill is about 45.7 million cubic yards.⁶⁷ With this capacity, the landfill can operate until 2025.⁶⁸

In 1988, San Francisco contracted for the disposal of 15 million tons of solid waste at the Altamont Landfill. Through August 1, 2009, the City has used approximately 12.5 million tons of this contract capacity. The City projects that the remaining contract capacity will be reached no sooner than August 2014. On September 10, 2009, the City and County of San Francisco announced that it could award its landfill disposal contract to SF Recycling & Disposal Inc., a subsidiary of Recology. Under this contract, SF Recycling & Disposal would ship solid waste from San Francisco by truck and rail to its Recology Ostrom Road Landfill in Yuba County. The landfill is open to commercial waste haulers and can accept up to 3,000 tons of municipal solid waste per day. The site has an expected closure date of 2066 with a total design capacity of over 41 million cubic yards.⁶⁹ The Board of Supervisors could ratify a new agreement, prior to entitlement of the proposed project, that could provide approximately 5 million tons of capacity, which would represent 20 or more years of use beginning in 2014. The City's contract with the Altamont Landfill expires in 2015.⁷⁰

Hazardous waste, including hospital, commercial, and household hazardous waste, is handled separately from other solid waste. Recology operates a facility at the San Francisco Dump (Transfer Station) for people to safely dispose of the hazardous waste generated from their homes or businesses.⁷¹

The HCSMP recommendations and guidelines are not expected to substantially affect the projected life of the Altamont Landfill or the City's current disposal agreement, and this impact would be less than significant. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact UT-4: Implementation of the HCSMP would not conflict with applicable statutes and regulations related to solid waste. (No Impact)

The HCSMP recommendations and guidelines would not conflict with pertinent federal, state and local statutes and regulations regarding the disposal of solid waste generated by construction activities; therefore, no adverse impacts would occur. Future project proposals related to the

⁶⁷ Facility/Site Summary Details.

⁶⁸ California Department of Resources Recycling and Recovery (CalRecycle), "Facility/Site Summary Details: Altamont Landfill & Resource Recv'ry (01-AA-0009)." Available online at <http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/>, accessed June 24, 2013.

⁶⁹ Recology web site at <http://www.recologyostromroad.com/>, accessed June 24, 2013.

⁷⁰ San Francisco is currently participating as a responsible agency in the environmental review process that Yuba County has begun for the *Recology Ostrom Road Green Rail and Permit Amendment Project (Project)* and to conduct CEQA review of San Francisco's proposal to enter into one or more new agreements with Recology for disposal and transportation of San Francisco's solid waste. On March 28, 2013, Yuba County and San Francisco entered into a Cooperative Agreement to designate Yuba County as the lead agency for the proposed project and to outline their cooperative efforts concerning environmental review of the proposed Project.

⁷¹ Recology, web page, "The San Francisco Dump (Transfer Station)," available at <http://sunsetscavenger.com/sfDump.htm>, accessed June 24, 2013.

HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-UT-1: In combination with past, present, and reasonably foreseeable future development in the project site vicinity, implementation of the HCSMP would not have a substantial cumulative impact on utilities and service systems. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would result in less-than significant impacts on utilities and service systems and would not be expected to have a considerable effect on utility service provision or facilities under cumulative conditions. For the reasons discussed above, the proposed project's impacts related to utilities and service systems, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
12. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the 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 public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact PS-1: Implementation of the HCSMP is not expected to increase demand for police protection and fire protection or require new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. (No Impact)

The San Francisco Police Department provides police services to residents, visitors and workers in the City and County from the following ten stations: Central, Southern, Bayview, Mission, North, Park, Richmond, Ingleside, Taraval, and the Tenderloin. Because the proposed project is a health care policy document, no individual projects are proposed, and the HCSMP would not require new or physically altered governmental facilities such as police stations.

With respect to fire protection, the San Francisco Fire Department (SFFD) provides emergency services to the City and County of San Francisco. The SFFD consists of 42 engine companies, 19 truck companies, 20 ambulances, 2 rescue squads, 2 fire boats and 19 special purpose units. The engine companies are organized into 9 battalions. There are 41 permanently-staffed fire stations,

and although the SFFD system has evolved over the years to respond to changing needs, the current station configuration has not changed substantially since the 1970s.⁷²

Implementation of the HCSMP would not conflict with the General Plan's Community Facilities Element pertaining to police facilities, nor would it conflict with the General Plan's "Principles for Fire Facilities," related to the siting of future fire stations. As such, the HCSMP would have no impact on police or fire services. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact PS-2: Implementation of the HCSMP would not require the construction of new or physically altered school facilities. (No Impact)

The San Francisco Unified School District (SFUSD) operates San Francisco's public schools. SFUSD managed 112 schools during the 2009 – 2010 academic year, including 73 elementary schools, 13 middle schools, 19 high schools, and nine charter schools, with a total enrollment of 55,140.⁷³ SFUSD student enrollment declined from 1995 to 2007 and has stabilized since then.⁷⁴

In the years to come, SFUSD anticipates that elementary school and middle school enrollment will grow, but high school enrollment is expected to decline due to the declining birth rates of the 1990s. Additional schools are under consideration in fast-growing areas of San Francisco, e.g., Mission Bay, Treasure Island, and Bayview Hunters Point, but no final decisions have been made. Implementation of the HCSMP is not anticipated to change the demand for schools, and no new school facilities would be needed to accommodate the recommendations and guidelines of the HCSMP. Because the HCSMP would not require the construction of new or physically altered schools, its implementation would have no adverse impact on public services. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact PS-3: The HCSMP would not increase demand for government services that would result in significant physical impacts. (No Impact)

As a policy document, the HCSMP would not increase demand for government services that would trigger the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

⁷² *A Review of San Francisco's Fire and EMS Services*, City and County of San Francisco, Office of the Controller, April 28, 2004. This document is available for review at the Planning Department in Case File No. 2010.0641E.

⁷³ San Francisco Unified School District (SFUSD), SFUSD Overview. Available online at: <http://www.sfusd.edu/en/about-sfusd/sfusd-profile.html>. Accessed July 30, 2012.

⁷⁴ TCDP EIR, p. 544.

Impact C-PS-1: Implementation of the HCSMP, combined with past, present, and reasonably foreseeable future projects in the vicinity, would not have a substantial cumulative impact to public services. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP is not expected to increase demand for public services beyond levels anticipated and planned for by public service providers, and would not be cumulatively considerable. For the reasons discussed above, the proposed project's impacts related to public services, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
13. 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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact BI-1: Implementation of the HCSMP would not have a substantial adverse effect, either directly or through habitat modifications, on any special status species, sensitive natural community, protected wetlands, or conflict with an adopted conservation plan. (Less than Significant)

The term “special-status species” refers to those plant and animal species that are listed and receive specific protection defined in federal or state endangered species legislation, as well as species not formally listed as “Threatened” or “Endangered” but designated as “Rare” or “Sensitive” on the basis of adopted policies and expertise of state resource agencies or organizations, or local agencies such as counties, cities, and special districts. A query of the California Department of Fish and Game’s (CDFG) California Natural Diversity Database reports 74 special-status plant and animal species in the San Francisco North and San Francisco South USGS 7.5-minute quadrangles.⁷⁵ “Special-status species” also include raptors (birds of prey), which, along with other taxa, are specifically protected by CDFG (under Fish and Game Code Section 3511 Birds, Section 4700 Mammals, Section 5050 Reptiles and Amphibians, and Section 5515 Fish) and by Fish and Game Code Section 3503.5, which prohibits the take, possession, or killing of raptors and owls, their nests, and their eggs. The inclusion of birds protected by Fish and Game Code Section 3503.5 is in recognition of the fact that these birds are substantially less common in California than most other birds, having lost much of their habitat to development, and that the populations of these species are therefore substantially more vulnerable to further loss of habitat and to interference with nesting and breeding than are most other birds.

San Francisco’s natural areas are the undeveloped remnants of the historical landscape, which contain rich and diverse plant and animal communities. Following the adoption of the current Recreation and Open Space Element in 1986, the RPD developed a Natural Areas Program to manage the 1,107 acres within 32 parks and portions of parks that constitute a natural area.⁷⁶ Most of the undeveloped portions of Twin Peaks, Lake Merced, and Glen Canyon Park are designated natural areas. Natural areas do not contain manicured lawns, ballfields, or ornamental flowerbeds. Most of Golden Gate Park—approximately 96 percent—is not a natural area.⁷⁷ Natural areas are defined as those areas that include natural habitat that may support candidate, sensitive, or special-status species. Example species include: red-tail hawk; snowy plover; western pond turtle; tree swallow; San Francisco garter snake; California red-legged frog; Mission Blue butterfly; Common Fiddleneck; San Francisco gumplant; hummingbird sage; California huckleberry, among others.⁷⁸

In the late 1990s, the RPD developed a Natural Areas Program to protect and manage natural areas for the natural and human values that these areas provide. The Natural Areas Program

⁷⁵ California Department of Fish and Game (CDFG), California Natural Diversity Database (CNDDDB) version 3.1.0, data request for the San Francisco North and San Francisco South U.S. Geological Survey 7.5-minute topographic quadrangles, commercial version, retrieved 7/27/2011.

⁷⁶ Thirty-one of the 32 designated natural areas are within the City and County of San Francisco and comprise a land area of about 870 acres. Sharp Park in Pacifica is the 32nd designated area and includes about 237 acres. Personal communication, Lisa Beyer, Recreation and Parks Department, August 31, 2011.

⁷⁷ Recreation and Parks Department Natural Areas Program FAQ, <http://sfrecpark.org/parks-open-spaces/natural-areas-program/natural-areas-faqs/>, accessed on June 24, 2013.

⁷⁸ CDFG, Special Animals List; Significant Natural Areas Plan (Public Draft), Table 3-5, San Francisco Recreation and Parks Department, June 2005. This document is available for review at the San Francisco Planning Department in Case File 2005.1912E.

mission is to preserve, restore and enhance the remnant Natural Areas and to promote environmental stewardship of these areas. In 1995, the San Francisco Recreation and Park Commission approved the first Significant Natural Resource Areas Management Plan (SNRAMP). The SNRAMP is currently undergoing an update and contains detailed information on the biology, geology and trails within the designated areas. The SNRAMP also recommends actions and best management practices intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years. Maintenance and conservation activities are categorized based on management priorities and represent differing levels of sensitivity, species presence, and habitat complexity. The SNRAMP is currently under environmental review and is scheduled for adoption in 2013.

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations. Implementation of the HCSMP would not conflict with existing or foreseeable conservation plans or programs that pertain to the protection of special status species or other natural resources. Therefore, implementation of the HCSMP would have a less than significant effect either directly or through habitat modifications, on any special status species, sensitive natural community, protected wetlands, or conflict with an adopted conservation plan. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact BI-2: Implementation of the HCSMP would not have a substantial adverse effect on any riparian habitat or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. (No Impact)

Wetlands and riparian areas provide habitat, biological benefits, and resource efficient methods for treating storm water runoff that often serve recreational users. Many of the City's wetlands have been buried by development and little of the original wetlands have survived. A number of restoration projects have recently been completed or are underway, including Crissy Field, Heron's Head, Pier 94 and the fresh and seasonal wetland at Lake Merced.

The state's authority in regulating activities in wetlands and waters resides primarily with the State Water Resources Control Board (SWRCB). The SWRCB, acting through the San Francisco Regional Water Quality Control Board (RWQCB), must certify that an Army Corps of Engineers permit action meets state water quality objectives (CWA Section 401). Any condition of water quality certification is then incorporated into the Corps Section 404 permit authorized for a specific project. The SWRCB and RWQCB also have jurisdiction over waters of the state under the Porter-Cologne Water Quality Control Act (Porter-Cologne). The SWRCB and RWQCB evaluate proposed actions for consistency with the RWQCB's Basin Plan, and authorize impacts on waters of the state by issuing Waste Discharge Requirements (WDR) or in some cases, a waiver of WDR.

The San Francisco Bay Conservation and Development Commission (BCDC) has jurisdiction over coastal activities occurring within the San Francisco Bay Area. BCDC was created by the

McAteer-Petris Act (California Government Code Sections 66600–66682). BCDC regulates fill, extraction of materials, and substantial change in use of land, water, and structures in San Francisco Bay and development within 100 feet of the Bay. BCDC has jurisdiction over all areas of the Bay that are subject to tidal action, including subtidal areas, intertidal areas, and tidal marsh areas that are between mean high tide and 5 feet above mean sea level. BCDC's permit jurisdiction does not extend to federally owned areas, such as GGNRA lands, because they are excluded from state coastal zones pursuant to the Coastal Zone Management Act of 1972 (CZMA). However, the CZMA requires that all applicants for federal permits and federal agency sponsors obtain certification from the state's approved coastal program that a proposed project is consistent with the state's program. In San Francisco Bay, BCDC is charged with making this consistency determination.

The purpose of the HCSMP is to improve San Francisco's health care system. Implementation of the HCSMP would have no impact on any riparian habitat or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. Future projects would be subject to separate, independent study and environmental review, and those projects that may affect wetland or riparian areas would be subject to regulations by, but not limited to, the Army Corps of Engineers, SWRCB, RWQCB and BCDC as appropriate. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact BI-3: Implementation of the HCSMP would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant)

There are approximately 400 resident and migratory species of birds in San Francisco, due to the diverse habitats of the Bay Area and its position on a coastal migration path known as the Pacific Flyway. The San Francisco Planning Department adopted the Standards for Bird-Safe Buildings ("Standards") in 2011.⁷⁹ These standards include guidelines for use and types of glass and façade treatments, wind generators and grates, and lighting treatments. The standards would impose requirements for bird-safe glazing and lighting minimization in structures or at sites that represent a 'bird hazard' and would recommend educational guidelines and voluntary programs. The Standards define two types of bird hazards. Location-related hazards are buildings located inside of, or within a clear flight path of less than 300 feet from, an Urban Bird Refuge.⁴⁷ Such buildings require treatment when new buildings are constructed; additions are made to existing buildings; or existing buildings replace 50% or more of the glazing within the "bird collision zone."²⁸ The standards require implementation of the following treatments for facades facing, or located within, an Urban Bird Refuge:

- No more than 10 percent untreated glazing on the building facades within the bird collision zone.

⁷⁹ City and County of San Francisco, Planning Department, Standards of Bird-Safe Buildings, available online at: http://www.sf-planning.org/sfp/files/publications_reports/bird_safe_bldgs/Design_Guide_Standards_for_Bird_Safe_Bldgs_Final.pdf, accessed on June 23, 2013.

- Minimal use of lighting. Lighting is to be shielded and no uplighting permitted. No event searchlights would be permitted for the property.
- Sites will not be permitted to use horizontal access windmills or vertical access wind generators that do not appear solid.

Feature-related hazards include building or structure related features that are considered potential “bird traps” no matter where they occur (e.g., glass courtyards, transparent building corners, clear glass walls on rooftops or balconies).

In addition, the Migratory Bird Treaty Act of 1918 states that no person may “pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention... for the protection of migratory birds... or any part, nest, or egg of any such bird (16 U.S.C. 703).”

Compliance with the Migratory Bird Treaty Act, and adherence to the City’s Bird-Safe Building Standards would have a less than significant effect on the movement of wildlife species. In addition, the HCSMP is a policy document that does not include construction activities. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact BI-4: Implementation of the HCSMP would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Less than Significant)

The San Francisco Planning Department, Department of Building Inspection (DBI), and Department of Public Works (DPW) have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees is implemented. The DPW Code Section 8.02-8.11 requires disclosure and protection of Landmark, Significant, and Street trees, collectively “protected trees” located on private and public property. A Landmark Tree has the highest level of protection and must meet certain criteria for age, size, shape, species, location, historical association, visual quality, or other contribution to the City’s character and have been found worthy of Landmark status after public hearings at both the Urban Forestry Council and the Board of Supervisors. A Significant tree is either on property under the jurisdiction of the DPW, or on privately owned land within 10 feet of the public-right-of-way which satisfies certain criteria. Street trees are trees within the public right-of-way or within the DPW jurisdiction. A Planning Department “Tree Disclosure Statement” must accompany all permit applications that could potentially impact a protected tree.

The HCSMP establishes policies to guide the City in improving its health care system. Implementation of the HCSMP would not conflict with existing tree preservation policies or ordinances, and this impact is considered less than significant, both individually and cumulatively. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-BI-1: Implementation of the HCSMP, combined with past, present, and reasonably foreseeable future projects in the vicinity, would not result in substantial cumulative adverse impacts to biological resources. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would result in less-than-significant biological impacts, and would not contribute to cumulative biological impacts. For the reasons discussed above, the proposed project's impacts related to biological resources, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
14. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

While the HCSMP would not directly result in the construction of new facilities, potential future projects proposed in the context of the HCSMP would be connected to the City's existing

wastewater treatment and disposal system, and would not require use of septic tanks or alternate wastewater disposal systems. Therefore, topic 14e is not applicable.

Impact GE-1: Implementation of the HCSMP would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. (No Impact)

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations.

While no known active faults exist in San Francisco, major earthquakes occurring on the faults surrounding the City have resulted in substantial damage within the City, and similar damaging earthquakes in the future are inevitable. The Community Safety Element of the General Plan contains maps that show areas of the City subject to seismic geologic hazards, and the policies and objectives of the Community Safety Element would apply to projects that are within areas subject to ground shaking from earthquakes along the San Andreas, Northern Hayward and other Bay Area faults. Implementation of the HCSMP would not result in impacts related to the rupture of a known earthquake fault. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact GE-2: Implementation of the HCSMP would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving expansive soils, seismic ground-shaking, liquefaction, lateral spreading, or landslides. (Less than Significant)

The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco's vulnerable populations.

The City and County of San Francisco is located in a seismically active region, and therefore the potential exists for seismic-related ground failure. Some areas in the City may also be subject to seismic-related liquefaction or landslides. The soils most vulnerable during an earthquake are in low-lying and artificial filled land along the Bay, in low-lying valleys and old creek beds, and to some extent, along the ocean. These liquefaction areas are generally located in the Western Shoreline, Presidio, Northeastern Waterfront, Downtown, Mission Bay, SoMa, the Mission, Central Waterfront, and Bayview-Hunters Point. The hills along the central spine of the San Francisco peninsula are composed of rock and soils that are less likely to magnify ground shaking, although they are sometimes vulnerable to landslides during an earthquake.

The Seismic Hazard Zones Map for San Francisco (see Map 4 on the General Plan Community Safety Element), illustrates the areas with liquefaction potential and those subject to earthquake induced landslides. This map is used by the City when adopting land use plans and in its permitting processes. Development proposals within the Seismic Hazard Zones must include a

geotechnical investigation and must contain design and construction features that will mitigate the liquefaction hazard. The City's Department of Building Inspection uses these guidelines during independent building review of proposed projects.

Although the potential for seismic ground shaking and ground failure to occur within San Francisco is unavoidable, no structures or specific projects are proposed under the HCSMP that would be constructed which could expose people to new seismic-related hazards. Compliance with the San Francisco Building Code, Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990 would off-set any potential impacts for future projects. The State of California provides minimum standards for building design through the California Building Code (CBC). The CBC regulates excavation, foundation and retaining walls. The CBC applies to building design and construction in the state and is based on the federal Uniform Building Code (UBC), used widely throughout the country. The CBC has been modified for California conditions with numerous, more detailed and/or more stringent regulations. The Code identifies seismic factors that must be considered in structural design.

Additionally, the San Francisco Building Code includes regulations that would further reduce potential impacts, such as requiring compliance with the City's Code that contains specific provisions related to seismic hazards and upgrades. Compliance with the Building Code is mandatory for development in San Francisco. Throughout the permitting, design, and construction phases of a building project, Planning Department staff, DBI engineers, and DBI building inspectors confirm that the Building Code is being implemented by project architects, engineers, and contractors. During the design phase for future residential development, foundation support and structural specifications based on the preliminary foundation investigations would be prepared by the engineer and architect and would be reviewed for compliance with the Building Code by the Planning Department and DBI. DBI in its permit review process would ensure that buildings meet specifications for the protection of life and safety and all new development would be required to comply with the previously discussed federal, state, and local regulations.

Based on the above, the HCSMP would have a less than significant impact with respect to the exposure of people to strong seismic ground shaking and seismic-related ground failure, including liquefaction, or landslides. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact GE-3: Implementation of the HCSMP would not result in substantial loss of topsoil, erosion or adverse impacts to topographical features. (Less than Significant)

Construction activities could result in impacts related to soil erosion and the loss of topsoil, if future projects in the context of the HCSMP would require substantial amounts of grading. This could result in erosion as well as potentially change the topography or any unique geologic or physical features.

Potential impacts would be offset by compliance with the California Building Standards Code and the San Francisco Building Code that include regulations that have been adopted to reduce

impacts from grading and erosion. Compliance with the Building Code is mandatory for development in San Francisco. During the design phase for buildings, grading plans must be prepared by the engineer and architect that would be reviewed by the Planning Department and Department of Building Inspection for compliance with the Building Code. Regulations that would further reduce erosion effects include compliance with National Pollution Discharge Elimination System (NPDES) permits related to construction activities as administered by the San Francisco Bay Regional Water Quality Control Board. Under these regulations, a project sponsor must obtain a general permit through the NPDES Stormwater Program for all construction activities with ground disturbance of one acre or more. The general permit requires the implementation of best management practices to control erosion, including the development of an erosion and sediment control plan for wind and rain. Therefore, implementation of the HCSMP would have a less than significant impact with respect to soil erosion or the loss of topsoil. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact GE-4: Implementation of the HCSMP would not construct new projects on geologic units or soils that are expansive, unstable, or that would become unstable as a result of future uses, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. (Less than Significant)

Construction activities could occur in the context of the HCSMP in the future and may result in impacts related to expansive soil if new uses would be constructed on or near unstable areas. However, as previously stated, no specific development projects are proposed at this time, and any future projects would require separate environmental review. Potential geotechnical and soils impacts would be offset by compliance with the previously discussed regulations, including those in the San Francisco Building Code. The Department of Building Inspection, in its permit review process, would ensure that buildings meet specifications for the protection of life and safety. Therefore, the implementation of the HCSMP would have a less than significant impact with respect to expansive soils, creating substantial risks to life or property. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-GE-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a substantial cumulative impact on geology and soils. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would result in less-than-significant impact to topographical features, loss of topsoil or erosion, or risk or injury or death involving landslides, and would not have a considerable contribution to related cumulative impacts. For the reasons discussed above, the proposed project's impacts related to geology, soils, and seismicity, both individually and cumulatively, would be less than significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
15. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact HY-1: Implementation of the HCSMP would not violate water quality standards or otherwise substantially degrade water quality. (Less than Significant)

Although the HCSMP does not propose new projects, construction of future projects that may be proposed in the context of the HCSMP would be required to comply with federal, state, and local regulations that pertain to water quality. Groundwater that is encountered during construction is subject to the requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77), requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. Treatment would be provided pursuant to the effluent discharge

standards contained in the City's National Pollutant Discharge Elimination System (NPDES) permit for its wastewater treatment plants.

Additional regulations that would reduce potential impacts from polluted runoff include compliance with NPDES permits related to construction activities as administered by the SFBRWQCB and Article 4 of the Porter-Cologne Water Quality Act, compliance with the Combined Sewer Overflow Control Policy and Total Maximum Daily Load standards as set forth by the Basin Plan.⁸⁰

The recommendations and guidelines of the HCSMP would not conflict with existing policies, regulations or programs that pertain to water quality. As such, implementation of the HCSMP would have a less than significant impact with regard to degradation of water quality or contamination of public water supply, individually or cumulatively. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HY-2: Implementation of the HCSMP would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. (Less than Significant)

The City overlies all or part of seven groundwater basins. These groundwater basins include the Westside, Lobos, Marina, Downtown, Islais Valley, South San Francisco, and Visitation Valley basins. The Lobos, Marina, Downtown and South basins are located wholly within the City limits, while the remaining three extend south into San Mateo County. With the exception of the Westside and Lobos basins, all of the basins are generally inadequate to supply a significant amount of groundwater for municipal supply due to low yield.⁸¹ Local groundwater use has occurred in small quantities in the City. For several decades groundwater has been pumped from wells located in Golden Gate Park and the San Francisco Zoo. Based on well operator estimates, about 1.5 million gallons a day is produced by these wells. The groundwater is mostly used in the Westside Groundwater Basin by the Recreation and Park Department for irrigation in Golden Gate Park and at the Zoo. These wells are located in the North Westside Groundwater Basin. The California Department of Water Resources (CA DWR) has not identified this basin as over-drafted, nor as projected to be over-drafted in the future. Based on semi-annual monitoring, the groundwater currently used for irrigation and other non-potable uses in San Francisco meets, or exceeds, the water quality needs for these end uses.

Implementation of the HCSMP would not directly result in the removal of water, either from the ground or other sources. However, construction of future projects that may be proposed in the context of the HCSMP could result in impacts related to groundwater supplies if the development would require dewatering or result in groundwater drawdown or substantially reduce infiltration. Future proposals would be evaluated on a project-level basis considering location of development, depth of potential groundwater, and type of construction being

⁸⁰ The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Quality Control Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan has been adopted and approved by the State Water Resources Control Board, U.S. EPA, and the Office of Administrative Law where required.

⁸¹ 2010 Urban Water Management Plan for the City and County of San Francisco, pg. 25, SFPUC, June, 2011.

proposed. Proposals would be required to comply with existing regulations, including the San Francisco Public Utilities Commission's Stormwater Design Guidelines. Therefore, the HCSMP would result in less-than-significant effects related to groundwater. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HY-3: Implementation of the HCSMP would not substantially alter the City's existing drainage patterns, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation. (Less than Significant)

The City contains many small creeks which historically ran from the east side of the City to the Bay, including Hayes Creek, Arroyo Delores, Mission Creek, Precita Creek, Islais Creek, and Yosemite Creek. The Presidio is home to Lobos Creek and Dragonfly Creek; Islais Creek runs through Glen Canyon and O'Shaughnessy Hollow. However, most of these creeks have been filled or run underground in culverts and are not free-flowing on the surface. There are no existing rivers in the City. Implementation of the HCSMP would not result in any direct erosion effects or alter the course of a stream or river.

The HCSMP does not propose new projects; however, construction of future projects may be proposed in the context of the HCSMP. The potential for on-site erosion of exposed soil surfaces during construction activity is addressed in Impact UT-1. As described therein, future projects would be assumed to comply with regulations related to runoff and grading, including the Stormwater Management Ordinance. As such, implementation of the HCSMP would have less-than-significant effects related to erosion and siltation. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HY-4: Implementation of the HCSMP would not expose people, housing, or structures to substantial risk of loss due to flooding. (Less than Significant)

Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers (Corps). The flood management agencies and cities implement the National Flood Insurance Program (NFIP) under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City of San Francisco does not participate in the NFIP, and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City of San Francisco for the first time. FIRMs identify areas that are subject to inundation during a flood having a 1.0 percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the floodplain that is at risk from a flood of this magnitude as a special flood hazard area (SFHA). In September 2007, FEMA published a preliminary FIRM for the City of San Francisco, identifying areas as subject to tidal surge and areas of coastal flooding subject to wave hazards.

On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new construction and substantial improvements in

flood-prone areas of San Francisco,⁸² and to authorize the City's participation in NFIP upon passage of the ordinance. The Mayor and Board of Supervisors approved a Floodplain Management Ordinance and prepared accompanying flood zone maps in July 2008 that regulate new construction and substantial improvements to structures in flood-prone areas; that ordinance was amended in March 2010.⁸³

Implementation of the HCSMP would have a less-than-significant impact with regard to exposing people or structures to significant flooding risk. Future projects that could be proposed in the context of the HCSMP would be subject to appropriate controls related to flooding. Therefore, the recommendations and guidelines of the HCSMP would result in less-than-significant effects related to flooding hazards. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HY-5: Implementation of the HCSMP would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow, or as a result of the failure of a reservoir. (Less than Significant)

The greatest risks to life and property in San Francisco result directly from the ground shaking and ground failure associated with large earthquakes. However, other less common, natural hazards include flooding due to a tsunami, seiche or reservoir failure, may occur as a result of an earthquake. Dams and reservoirs which hold large volumes of water represent a potential hazard due to failure caused by ground shaking.

Tsunamis (seismic sea waves) are large, long period waves that are typically generated by underwater seismic disturbances, volcanic eruptions, or submarine landslides. Tsunamis, which travel at speeds up to 700 miles per hour, are typically only 1 to 3 feet high in open ocean water but may increase in height to up to 90 feet as they reach coastal areas, causing potentially large amounts of damage when they reach land.⁸⁴ Damaging tsunamis are not common on the California coast. Most California tsunami are associated with distant earthquakes (most likely those in Alaska or South America), not with local earthquakes. Devastating tsunamis have not occurred in historic times in the Bay area. Because of the lack of reliable information about the kind of tsunami run-ups that have occurred in the prehistoric past, there is considerable uncertainty over the extent of tsunami run-up that could occur. There is ongoing research into the potential tsunami run-up in California. Map 5 (Tsunami Hazard Zones) of the General Plan Community Safety Element shows areas where tsunamis are thought to be possible.

Low-lying coastal areas such as tidal flats, marshlands, and former Bay margins that have been artificially filled but are still at or near sea level are generally the most susceptible to tsunami

82 New construction means structures for which the start of construction commenced on or after the effective date of the floodplain management regulations were adopted, and includes any substantial improvements to such structures. The proposed renovation project would not involve new construction as defined by the Floodplain Management Ordinance, as amended.

83 Ordinance 56-10 (2010), available at <http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/ordinances10/o0056-10.pdf>, accessed August 2, 2012.

84 City and County of San Francisco Hazard Mitigation Plan, URS Corporation, <http://www.sfdem.org/jsp/uploadedfiles/DEMPlansReports/HazardMitigationPlan.pdf>, accessed June 23, 2013.

inundation. Some coastline residential areas and existing parks and recreational facilities, including Ocean Beach, the Presidio, Crissy Field, Marina Green, Aquatic Park, Justin Herman Plaza, Treasure Island and Candle Stick Point Recreation Area are located within mapped tsunami inundation areas.⁸⁵

A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur on the San Francisco Bay due to seismic or atmospheric activity. Seiches can result in long-period waves that cause run-up or overtopping of adjacent landmasses, similar to tsunami run up. According to the historical record, seiches are rare.

The San Francisco Public Utilities Commission owns above ground reservoirs and tanks within San Francisco. Their inundation areas are shown in Map 6 (Dam Failure Inundation Areas) of the General Plan Community Safety Element. The SFPUC owns aboveground reservoirs and tanks within the City and their Water Department monitors its facilities and submits periodic reports to the California Department of Water Resources, Division of Safety of Dams (DOSD), which regulates large dams. The City's largest reservoir is the Sunset Reservoir located in the Outer Sunset area. The reservoir includes a publicly accessible park around its perimeter and users in this area could potentially be subject to risk from flooding in the event of reservoir failure. The SFPUC has recently completed a seismic retrofit of the Sunset Reservoir. The north basin roof, columns and beams have been seismically reinforced and the earth embankment around the reservoir was stabilized to minimize risk from liquefaction.

In the event that an earthquake occurred that would be capable of producing a tsunami that could affect San Francisco, the National Warning System would provide warning to the City. San Francisco has developed an emergency text-message alerting system, AlertSF, which delivers disaster notifications to registered users, and allows users to access neighborhood specific information. In addition, the City has reestablished the old World War II sirens to provide alerts to residents, and is further upgrading the system to broadcast voice instructions for responding to an emergency. Also under development is the 311 City phone service, where callers will get assistance from an agent 24 hours a day, seven days a week, and will provide real-time instructions during an actual emergency. The San Francisco warning system (sirens and loudspeakers, tested each Tuesday at noon) would then be initiated, which would sound an alarm alerting the public to tune into local TV, cable TV, or radio stations, which would carry instructions for appropriate actions to be taken as part of the Emergency Alert System. Police would also canvas the neighborhoods sounding sirens and bullhorns, as well as knocking on doors if needed, to provide emergency instructions. Evacuation centers would be set up if required. The advance warning system would allow for evacuation of people, including those who may be in parks or using recreational facilities, prior to a seiche and would provide a high level of protection to public safety.

The intent of the HCSMP is to provide a dynamic and inspiring roadmap for bettering health and health services, focus on improving access to care, particularly for San Francisco's vulnerable populations. Implementation of the HCSMP would have a less-than-significant impact with

⁸⁵ California Emergency Management Agency, California Geological Survey, Tsunami Inundation Maps for Emergency Planning, San Francisco West, North and East Quadrangles, California Department of Conservation, http://www.conservacion.ca.gov/CGS/GEOLOGIC_HAZARDS/Tsunami/Pages/Index.aspx, accessed June 23, 2013.

regard to exposing people or structures to significant risk of loss, injury or death involving inundation by seiche, tsunami, mudflow, or by reservoir failure. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-HY-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a substantial cumulative impact on hydrology and water quality. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would have less-than-significant impact on hydrology and water quality, and the project's contribution to any cumulative impacts on hydrology or water quality would be less-than-significant.

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

Because San Francisco International Airport is about 8 miles south of the City, topics 6e and 6f are not applicable.

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

Several of the City's agencies provide businesses and residents with information about disposal of hazardous materials. The San Francisco Fire Department is responsible for administering local safety regulations for business operating with hazardous materials, and is the first responder to chemical and hazardous spill accidents, and risk/hazard assessments, capability assessments, and detailed response planning. The San Francisco Department of Public Health enforces State and San Francisco environmental health laws, including hazardous materials storage, issues hazardous materials use permits; investigates illicit discharge and disposal of hazardous materials. The San Francisco Public Utilities Commission provides residents and businesses with information (through ads and website resources) on how to properly dispose of hazardous materials including waste oils such as motor oil.

The HCSMP is a policy document that includes program-level recommendations and guidelines for improvement of San Francisco's health care system. The HCSMP does not identify site-specific projects for the City, and as such, no specific development projects are analyzed in this Initial Study. Implementation of the HCSMP would not create a significant hazard through routine transport, use, disposal, handling, or emission of hazardous materials, and impacts would be less than significant. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HZ-2: Implementation of the HCSMP would not create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)

Older buildings and other facilities in San Francisco may contain hazardous materials such as asbestos, PCBs and lead. The Planning Department, Department of Public Health, and other responsible agencies may require that a Phase I Environmental Site Assessment ("Phase I ESA") be prepared in conjunction with a specific project to determine the potential for hazardous materials to be present at, within, or beneath the surface of a building or a property. If the Phase I ESA determines a potential for hazardous materials or contamination to exist, further analysis ("Phase II Site Assessment") may be required. As part of a Phase II, soils or materials sampling may be required to test for the presence of hazardous materials. If such materials exist in a building when it is demolished or altered, or if soils are disturbed that may be contaminated, they could pose hazards to workers, neighbors, or the environment. The removal of hazardous building materials, including lead-based paint and asbestos, is regulated by Chapter 34 of the San Francisco Building Code and Section 19827.5 of the California Health and Safety Code, respectively. PCBs are regulated under federal and state law. Byproducts of PCB combustion are known carcinogens and are respiratory hazards, so specific handling and disposal of PCB-

containing products is required. PCBs are most commonly found in lighting ballasts, wet transformers, and electrical equipment that uses dielectric fluids. PCBs are also occasionally found in hydraulic fluids.

The San Francisco Department of Public Health (DPH) often acts as the lead agency to ensure proper remediation of leaking underground storage tanks (LUST) sites and other contaminated sites in San Francisco. Local regulations have been enacted to address the potential to encounter hazardous materials in the soil at development sites and the safe handling of hazardous materials (including hazardous wastes). The following sections of the San Francisco Health Code, briefly summarized, could apply to sites to be developed or reused within the City. These include Article 22A (Analyzing the Soil for Hazardous Waste, formerly the Maher Ordinance), Article 21 (Hazardous Materials), Article 21A (Risk Management Program), and Article 22 (Hazardous Waste Management).

An Article 22A investigation is required if: (1) more than 50 cubic yards of soil are to be disturbed, (2) the project site is bayward of the 1851 high-tide line (i.e., in an area of Bay fill), as designated on an official City map, or (3) the site is at any other location in the City designated for investigation by the Director of the SFDPH. The reports are submitted to the Department of Public Works and DPH. Article 22A regulations take effect at the time of the building permit application for projects located on filled land requiring excavation.

Article 21 of the Health Code provides for safe handling of hazardous materials in the City. It requires any person or business that handles, sells, stores, or otherwise uses specified quantities of hazardous materials to keep a current certificate of registration and to implement a hazardous materials business plan. A special permit is required for underground storage tanks. Article 21A of the Health Code provides for safe handling of federally regulated hazardous, toxic, and flammable substances in the City, requiring businesses that use these substances to register with the SFDPH and prepare a Risk Management Plan that includes an assessment of the effects of an accidental release and programs for preventing and responding to an accidental release.

The HCSMP is a policy document that includes program-level recommendations and guidelines for improvement of San Francisco's health care system. The HCSMP does not identify site-specific projects for the City, and as such, no specific development projects are analyzed in this Initial Study. Implementation of the HCSMP would not create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, and therefore this impact would be less than significant. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HZ-3: Implementation of the HCSMP would not substantially emit hazardous emissions or acutely hazardous materials to schools. (Less than Significant)

As discussed in HZ-1 above, the HCSMP would not directly create significant hazards as no specific projects are proposed. The exact location and quantity of potential hazardous materials associated with future projects under the context of the HCSMP is unknown. In addition, any future project that could result in physical effects on the environment would require separate environmental review.

Although hazardous materials and waste generated from future construction may pose a health risk to nearby schools, all businesses associated with housing construction that handle or involve on-site transportation of hazardous materials would be required to comply with the provisions of the City's Fire Code and any additional regulations as required in the California Health and Safety Code Article 1 Chapter 6.95 for a Business Emergency Plan, which would apply to those businesses associated with construction activities. Both the federal and state governments require all businesses that handle more than a specified amount of hazardous materials to submit a business plan to a regulating agency. In addition, implementation of federal and state regulations would minimize potential impacts by protecting schools from hazardous materials and emissions. For example, federal regulations such as Resource Recovery and Conservation Act would ensure that hazardous waste is regulated from the time that the waste is generated until its final disposal, and National Emission Standards for Hazardous Air Pollutants would protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. San Francisco's Hazardous Materials Unified Program Agency is responsible for California Uniform Program Authority in the City and would require all businesses (including city contractors) handling hazardous materials to create a Hazardous Materials Business Plan which would reduce the risk of an accidental hazardous materials release.

As described above in HZ-1, implementation of the HCSMP would not directly require the storage, handling, or disposal of significant quantities of hazardous materials and would not otherwise include emissions of hazardous substances. Therefore, the proposed project would have a less than significant impact related to hazardous emissions or materials within a quarter mile of a school. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HZ-4: Implementation of the HCSMP would not expose people or structures to a significant risk of loss, injury, or death involving fires, and would not interfere with the implementation of an emergency response plan. (Less than Significant)

The General Plan's Community Safety Element establishes policies to guide the City's actions in preparation for, response to, and recovery from a major disaster. San Francisco ensures fire safety and emergency access within new and existing developments by its building and fire codes. These codes require projects to conform to their standards, which may include development of an emergency procedure manual and an exit drill plan for specific developments, as applicable. Potential fire hazards would be addressed during the permit review process for a specific undertaking. Conformance with these standards would ensure appropriate life safety protections.

Implementation of the HCSMP would not expose people or structures to a significant risk of loss, injury, or death involving fires, and would not interfere with the implementation of an emergency response plan. Therefore this impact would be less than significant. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact HZ-5: Implementation of the HCSMP would not direct development that could 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, the HCSMP would not create a significant hazard to the public or the environment. (Less than Significant)

The Hazardous Waste and Substances Sites (Cortese) list is a tool used by the State and local agencies and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency (EPA) to develop an updated Cortese List at least annually.

The City contains sites that have been identified as being contaminated from the release of hazardous substances in the soil, including industrial sites, sites containing leaking underground storage tanks, and large and small-quantity generators of hazardous wastes. The HCSMP, as a policy document, does not include any specific projects, and thus does not include any new development or construction on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Future projects that could be developed in the context of the HCSMP would be subject to a project-level environmental review. Therefore, implementation of the HCSMP would have a less than significant impact with respect to hazardous materials sites. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

Impact C-HZ-1: Implementation of the HCSMP, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a substantial cumulative impact with hazards and hazardous materials. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would have less-than-significant impacts on hazards and hazardous materials. Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. Therefore, implementation of the HCSMP would not contribute to cumulatively considerable significant effects related to hazards and hazardous materials. For the reasons discussed above, the proposed project's impacts related to hazards and hazardous materials, both individually and cumulatively, would be less than significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
17. MINERAL AND ENERGY RESOURCES— Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

All land in the City is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975.⁸⁶ This designation indicates that there is inadequate information available for assignment to any other MRZ and therefore the City is not a designated area of significant mineral deposits. No area within the City is designated as a locally-important mineral resource recovery site. Accordingly, topic 17a and 17b are not applicable.

Impact ME-1: Implementation of the HCSMP would not result in the use of large amounts of fuel, water or energy, or use these resources in a wasteful manner. (Less than Significant)

Future projects that could be developed in the context of the HCSMP could use energy produced in regional power plants using hydropower and natural gas, coal and nuclear fuels. New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for a building permit. Title 24 is enforced by the Department of Building Inspection.

Pursuant to the San Francisco Green Building Ordinance (No. 180-08), all new municipal buildings in the City are required to obtain US Green Building Council Leadership in Energy and Environmental Design (LEED) Silver Certification. This certification system could require future projects to incorporate best management practices in sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality where feasible. Given that future projects would be required to adhere to Title 24 provisions as well as the Green Building Ordinance, implementation of the HCSMP would have a less-than-significant impact on energy use. Future project proposals related to the HCSMP could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

⁸⁶ California Division of Mines and Geology, Open File Report 96-03 and Special Report 146 Parts I & II.

Impact C-ME-1: Implementation of the HCSMP, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to energy and minerals. (Less than Significant)

By its nature as a city-wide policy document, the analysis of the effects related to the implementation of the HCSMP is cumulative; therefore, the responses to the above impact statements considered individual and cumulative effects together. Implementation of the HCSMP would have less-than-significant impacts on mineral and energy resources and would not contribute to any cumulative impact on mineral and energy resources. For the reasons discussed above, the proposed project's impacts related to mineral and energy resources, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
18. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project, and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.					
—Would the project					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact AG-1: Implementation of the HCSMP would not conflict with zoning for agricultural use, result in the loss of forest land, or otherwise convert farmland or forest land to non-agricultural or non-forest use. (Not Applicable).

The City and County of San Francisco is located within an urban area, which the California Department of Conservation's Farmland Mapping and Monitoring Program identifies as Urban and Built-Up Land, defined as "... land [that] is used for residential, industrial, commercial,

institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.”

The project site does not contain agricultural uses and is not zoned for such uses. Implementation of the HCSMP would not convert any prime farmland, unique farmland or Farmland of Statewide Importance to non-agricultural use. It would not conflict with existing zoning for agricultural land use or a Williamson contract, nor would it involve any changes to the environment that could result in the conversion of farmland. Accordingly, Initial Study Checklist Topics 18a, 18b, 18c, 18d, and 18e are not applicable to the HCSMP.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
19. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:					
a) Have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The preparers of the Initial Study have discussed all of the environmental issue areas required by Section 15063 of the CEQA Guidelines and have found either no impact or less than significant impacts in all issue areas related to the adoption of the HCSMP. The HCSMP is a policy document that consists of identifying the current and projected needs for, and general city areas or locations of, health care services with San Francisco, and set forth recommendations on how to achieve and maintain an appropriate distribution of health care services with a focus on access, particularly for San Francisco’s vulnerable populations. Implementation of the HCSMP would not result in cumulative impacts to land use, aesthetics, population and housing, cultural resources, transportation, noise, air quality, greenhouse gas emissions, wind and shadow, recreation, utilities, public services, biological resources, geology, hydrology, hazardous materials, mineral resources, and agricultural resources. Implementation of the HCSMP would not have unavoidable environmental effects that are cumulatively considerable, and would not result in environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

G. PUBLIC NOTICE AND COMMENT

A "Notification of Project Receiving Environmental Review" was mailed on May 22, 2013, to interested parties. One member of the public expressed concerns regarding the data used in the HCSMP and that the HCSMP did not provide any language regarding locating medical facilities in environmentally superior sites. Comments regarding the merits of the project are not relevant to CEQA analysis but may be taken into account by decision-makers as part of the project approval process, and pursuant to CEQA, a discussion of alternatives is only required for Environmental Impact Reports. No other comments were received.

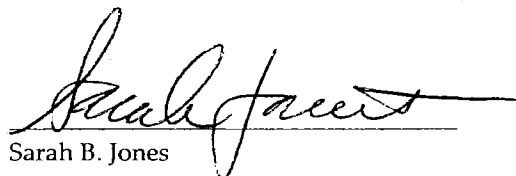
H. DETERMINATION

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

July 22, 2013



Sarah B. Jones
Acting Environmental Review Officer
for
John Rahaim
Director of Planning