



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

Memorandum

Date: October 1, 2018
Case No: 2015-012094GEN
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RE: **Transportation Impact Analysis Guidelines Update, Emergency Access**

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INTRODUCTION

The Environmental Planning Division within the San Francisco Planning Department reviews projects for potential impacts on the environment, a process known as environmental review. The department conducts reviews pursuant to the California Environmental Quality Act (CEQA) and Chapter 31 of the San Francisco Administrative Code. As part of environmental review, the department reviews background technical studies, such as transportation impact studies, to assess a project's effects on the physical environment. These background technical studies support the conclusions of the environmental impact evaluation and guide decision-makers during the project approval process. To assist in the preparation of transportation impact studies, the department provides to consultants and city staff a guidance document, the Transportation Impact Analysis Guidelines. The department periodically updates the guidelines, with the last update in 2002.

This memorandum updates the guidance provided in the guidelines prepared in 2002 for the emergency access¹ topic. The department prepared this memorandum in consultation with stakeholders (e.g., city and county agencies, consultants). The department will issue memoranda that provide updates to other topics (e.g., public transit, loading) within the guidelines. When the department issues a memorandum about a topic, it will supersede existing guidance regarding that topic.

The guidance provided herein assumes a land use development project located outside of an area plan that requires a transportation impact study. Guidance on other types of projects is discussed below under the "Other" subsection. The department may use this guidance for multiple projects, but the department has discretion on applying the guidance on a project by project basis.

The organization of the memorandum is as follows:

- 1) Project Description
- 2) Significance Criteria
- 3) Methodology – Existing and Existing plus Project
- 4) Existing Baseline
- 5) Impact Analysis – Existing plus Project
- 6) Methodology – Cumulative
- 7) Cumulative
- 8) Impact Analysis – Cumulative
- 9) Other (covers different types of projects)

¹ This memorandum addresses impacts to emergency access. Emergency access refers to the following emergency service operators: Fire Department, Police Department, and ambulance services.

Appendices are under a separate cover. The department may update the appendices to the memoranda more frequently than the body of the memoranda.

PROJECT DESCRIPTION

This section describes project description features, figures, and tables as it relates to emergency access. This section also describes approvals from agencies other than the department that a project sponsor may need to obtain for those features.

Basics

This sub-section describes the typical physical, additional physical and programmatic features for existing and project conditions, as applicable. The geographic extent of these features must, at a minimum, include the project's frontage and may include the entirety of the project's block. This sub-section also indicates in bracketed text [] whether the presentation of typical physical features could occur in text, a figure, and/or a table. Appendix A provides examples of tables.

Typical Physical Features

The project description must include the following typical physical features to the extent applicable:

- Whether the existing site is vacant, partially occupied, or fully occupied, by use [text, figure, table]
- Type, location, and square footage (gross and total) by land use, building, and total amount [text, figure, table]
- For residential, number of units by bedroom type (number of bedrooms) and percentage of on-site affordable units by income level and/or age [text, table]
- For hotel, number of rooms [text, table]
- For student housing, number of rooms [text, table]
- For entertainment uses, number of seats and/or standing capacity (maximum occupancy) [text, table]
- For schools and child care facilities, capacity by age [text, table]
- Location and number of off-street vehicular parking spaces [text, figure, table]
- Location, number, and dimensions of off-street freight or delivery service loading spaces [text, figure, table]
- Location and dimensions of driveways, including the throat (i.e., area between property line and internal vehicular circulation system) and associated control devices (e.g., gates, stop sign, right turn in/out) [text, figure]
- Location (e.g., distance and direction from intersection), number, and dimension of curb cuts [text, figure]
- Typical dimensions of paved areas between the curb line and property line (i.e., sidewalks), including identifying any curb dimension changes (e.g., bulb-ins, bulb-outs) [text, figure]
- Location and dimensions of on-street passenger loading spaces (e.g., paratransit, for-hire vehicles) or transit boarding zones [text, figure]
- Entrance and exit locations to building(s) for people walking to and from publicly accessible areas [text, figure]

Additional Physical Features

The project description may include, among others, the following additional physical features to the extent applicable.

- Location and dimensions of new publicly-accessible rights-of-ways (e.g., new street, mid-block alley) [text, figure]
- The location and dimensions of existing fire apparatus access road [text, figure]
- Location and dimensions of sidewalks or bulb-outs [text, figure]
- Location and approximate dimensions of “Keep Clear Zones” along the project frontage [text, figure]
- Location and dimensions of interior open spaces, walkways, and midblock passages [text, figure]
- Locations of existing fire hydrants along the project frontage [text, figure]
- Location and dimensions of any existing overhead Muni lines or rail tracks [text, figure]
- Locations and dimensions of on-street red curb zones on the project frontage [text, figure]
- The distance from the curb line to entrances/exits to building(s) [text, figure]
- Location of permanent physical obstructions between the curb line and entrances/exits to building(s) [text, figure]

The department will determine applicability of the additional physical features based upon whether the project would change some of these features and the extent this information may be necessary to inform the impact determination. For example, a 100 dwelling unit project not located near an emergency service operator facility and not modifying the street network would not require a description of these physical features.

Programmatic Features, if applicable

The project description may include the following additional programmatic features to the extent applicable. The department will determine project description applicability based upon whether these features are inherent features of the project, which may typically be considered, or whether they are actions related to project operations that are used to avoid a significant impact (e.g., funding mechanisms), which may typically not be considered:

- Days and hours of operation of land use [text]
- Days and hours of operation of loading zone, if near an emergency service operator facility [text]
- Presence of bollards [text, figure]

Approvals

The following is a non-exhaustive list of approvals from agencies other than the planning department that a project sponsor may need to obtain for the project description features described above.

San Francisco Board of Supervisors

- Changes that involve establishing a new sidewalk, shared streets, bulb-ins, reductions in the official sidewalk width, or sidewalk widening in excess of one linear block
- Major encroachment permits or any non-standard improvements beyond the limits of the subject property frontage and or/beyond the centerline within the public right-of-way

San Francisco Public Works

- Sidewalk bulb-outs, corner bulb-outs, or sidewalk widenings not in excess of one linear block

- Installation of physical structures in the public right-of-way (e.g. street furniture, sidewalk seating) along the project frontage
- Compliance with Americans with Disabilities Act (ADA) is required for every project

San Francisco Municipal Transportation Agency

- Changes to transit stop locations including changes to transit shelters
- Changes to traffic signals, traffic calming (e.g., islands, bulb-outs, and daylighting), speed limits, and lane striping
- Changes to off-street parking
- Changes in color curb designation on streets bordering the project and/or in the immediate vicinity

San Francisco Department of Building Inspection

- Changes to fire apparatus roads, including obstructions, minimum widths, and clearances
- Access to the public right-of-way on new or altered streets
- Emergency access to a building entrances and exits (path of travel)

SIGNIFICANCE CRITERION

San Francisco Administrative Code Chapter 31 directs the department to identify environmental effects of a project using as its base the environmental checklist form set forth in Appendix G of the CEQA Guidelines. As it relates to emergency access, Appendix G states: “would the project result in inadequate emergency access?”² The department uses the following significance criterion to evaluate that question: A project would have a significant impact if it: would result in inadequate emergency access.³

METHODOLOGY – EXISTING AND EXISTING PLUS PROJECT

This section describes the typical geography, period, and methodology required to address the significance criteria. The methodology section identifies the collection, generation, and approach to analyze data. The department will determine the appropriate methodology as necessary to inform the analysis. For example, a 100 dwelling unit project that does not include off-street parking and does not modify the street network would not require a detailed analysis of emergency access.

Basics

Geography

The methodology will typically focus on the sidewalks and streets adjacent to the project site, the intersections within one block of the project site, and emergency service operator facilities within the project study area. The study area is typically a one block radius, but the department may extend it for large projects.

² The Appendix G language shown reflects the California Natural Resources Agency, *Amendments and Additions to the CEQA Guidelines*, January 2018.

³ Emergency service operator facilities include police departments, fire departments, hospitals, or other public safety buildings for emergency vehicle fleets.

Period

In San Francisco, the weekday extended p.m. peak period (Tuesday, Wednesday, or Thursday, 3 p.m. to 7 p.m.) is typically the period when the most overall travel happens.⁴ Although a substantial amount⁵ of travel occurs throughout the day and impacts from projects would typically be less during other periods, the methodology should typically focus on this period as changes in travel demand or public right-of-way would be acute compared to other times of the day and days of the week. In some instances, the most overall travel may occur at different periods (a.m., midday, post p.m. peak, and/or weekend) for smaller geographic areas (e.g., a segment of a street) in existing conditions or as a result of the project, or the project may result in substantial disparity in travel demand at different periods (e.g., special events). In circumstances where a project is located near an emergency service operator facility, the methodology could overlap with peak period of regularly scheduled activity at operator facilities (e.g., operator drills in the street). In these instances, the methodology may substantiate the use of periods in addition to or other than the weekday p.m. peak.

Data Collection

This sub-section describes the typical methodology for data collection for existing and existing plus project conditions. This sub-section also indicates in bracketed text [] whether the presentation of typical methodological elements in other sections of the transportation analysis (e.g., baseline, impact analysis) could occur in text, a figure, and/or a table. Appendix A provides examples of tables.

Existing Conditions

The following identifies the typical methodology for projects. The department will determine the appropriate methodology as necessary to inform the impact determination:

Counts

The methodology should include counts of people driving collect for the project. The methodology may include prior counts collected from other studies or sources combined with (e.g., an average of three different dates with counts at the same intersection, global positioning system user data) or in isolation of counts collected for the project. The use of prior counts must be justified, in consultation with the department. Typically, the use of prior counts may occur if amounts have not changed substantially (e.g., due to lack of new development, circulation changes, or travel patterns). The methodology shall include counts of emergency vehicles entering and exiting the emergency service operator facility, if the project site is an emergency service operator facility or is near one. [text, table]

⁴ Examples that illustrate this statement: within the San Francisco County Congestion Management Program network transit and vehicular travel speeds are lower during the p.m. peak period (4:30 p.m.-6:30 p.m.) than during the a.m. peak period (7 a.m.-9 a.m.) as documented in San Francisco County Transportation Authority, *Congestion Management Program*, December 2015; demand at transit stations is consistent and generally higher throughout the p.m. peak period relative to demand at transit stations during the a.m. peak period, as documented in the Metropolitan Transportation Commission, *Core Capacity Transit Study Briefing Book*, July 2016; the weekday peak period for transportation network companies occurs from 6:30 p.m. to 7 p.m., as documented in San Francisco County Transportation Authority, *TNCs Today: a Profile of San Francisco Transportation Network Company Activity*, June 2017.

⁵ Throughout this Memo, the term “substantial amount” is used but not defined. This is because what constitutes a substantial amount of people, vehicles, etc., depend on the context in which the project is being evaluated (e.g., existing conditions, proposed land uses, and other variables).

Visual Analysis with Recorded Observations

The methodology should include a site visit for a visual analysis, with recorded observations of features listed in the project description. In addition, the site visit must record any existing potential, or observed instances of vehicles queuing or blocking emergency vehicles or existing, conditions that may conflict with emergency vehicles movements such as the presence of transit overhead wires, narrow roads or alleys, or tight turning movements.

Street Characteristics

The methodology should obtain the following general characteristics of streets within the study area:

- Location and type of traffic control devices (e.g., stop signs and signals) [text, figure]
- Number of travel lanes by type (e.g., mixed flow, parking, bicycle, transit-only, etc.) [text, figure]

The methodology should obtain the following additional characteristics of streets within the study area to the extent applicable:

- Width of travel lanes, parking lanes, and bike lanes [text, figure]
- Number of travel lanes by type at intersections (if different from midblock) [text, figure]
- Cross sections showing location and dimensions of travel lanes, parking lanes, bicycle facilities, and sidewalks on the street(s) adjacent to the project frontage [figure]

Emergency Service Operator Facilities and Turning Movements

The methodology should obtain the following additional information with the study area:

- Emergency service operator facilities [text, figure]
- Turning movements for emergency vehicles [figure]

Existing plus Project Conditions

The following identifies the typical methodology:

Travel Demand Analysis

The methodology will estimate the amount of people driving from the project. [text, table] In addition, the methodology will distribute and assign the project's vehicle trips to roadways, intersections, loading zones, and driveways to the extent applicable. The methodology should describe the project's entrance and exit locations and emergency service operator facilities within the project study area. [text, figure]

Inadequate Emergency Access

The methodology will use the travel demand analysis and project elements to determine if the project would potentially cause inadequate emergency access. The methodology should assess to the extent applicable:

- the ability of facilities on or near the project site to accommodate emergency service operators [text]
- any changes to the public right-of-way that would result in changes to turning movements or alter the ability of emergency service operators to access streets and buildings in the project study area [text, figure]
- the ability of emergency service operator facilities near the project site to conduct operations that could interact with project trips [text]

EXISTING BASELINE

The existing baseline⁶ must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced (e.g., department notification of project receiving environmental review), from both a local and regional perspective. While the baseline subsection may repeat existing conditions features described in the project description, the baseline will also present (text, figure, or table) the applicable elements included in the methodology as it relates to those features. For example, the project description describes the physical location of an emergency service operator. In addition, the baseline conditions must indicate the date and time that counts, visual observations, etc. occurred.

IMPACT ANALYSIS – EXISTING PLUS PROJECT

This section ties the project description, methodology, and baseline for existing conditions together to address the significance criteria for existing plus project conditions. This section addresses the typical approach for the impact analysis and provides more details related to emergency access impacts for emergency service operators. The impact analysis section should present a format (text, figure, or table) consistent with earlier sections for easy comparison.

Basics

The purpose of the impact analysis is not to exhaustively repeat information from elsewhere. Instead, the impact analysis presents the findings of the analysis based upon the methodology(ies) applied to gather information. The impact analysis must only provide information that is relevant to the significance criterion. For the significance criterion (see below for more details), the analysis must (in the order presented):

- 1) Address the project's direct and indirect physical changes to the existing conditions. Describe the intensity (e.g., amount of vehicle trips), location (e.g., driveway, particular street), and other project features that may be relevant to address the significance criterion. Be specific (e.g., the project would generate 120 vehicle trips along the street(s) adjacent to the project frontage during the p.m. peak hour), do not generalize (e.g., the project would generate a modest amount of vehicle trips). The impact analysis shall assume the project will comply with laws and regulations⁷ and the analysis shall describe how compliance would occur, what it would entail, and how it may lessen impacts.
- 2) Identify an impact finding without mitigation: no impact, less-than-significant impact, or a significant impact. Ensure that step 1 substantiates the rationale for that impact finding.
 - 2.A) If the project would result in a less-than-significant impact, the impact analysis is complete.
 - 2.B) If the project would result in a significant impact, if applicable, introduce the title of a mitigation measure in paragraph form to reduce the impact. Briefly describe the nexus and rough proportionality to the extent applicable between the mitigation measure and the impact. Briefly describe how the measure would reduce the impact and briefly analyze whether it would have any environmental impacts of its own.

⁶ Other baselines (e.g., future baseline) will be described in another memo, which will be part of the Transportation Impact Analysis Guidelines update.

⁷ Per the California Vehicle Code, Section 21806, all vehicles must yield right-of-way to emergency vehicles and remain stopped until the emergency vehicle has passed.

- 3) Introduce the title of the mitigation measure. Measure text should clearly explain who is responsible for what and where and when. Mitigation measure text should attempt to reduce the impact below the threshold of significance. If the mitigation measure does not reduce the impact below the threshold of significance, but it still reduces the impact, explain qualitatively how is the impact reduced, and why it is not reduced below the threshold of significance.
- 4) If the project would result in a significant impact, identify the conclusion impact finding: less than significant with mitigation, significant and unavoidable, or significant and unavoidable with mitigation.
- 5) Introduce analysis provided for informational purposes (e.g., code compliance, see later section regarding details).

Inadequate Emergency Access

The impact analysis must address whether the project would result in inadequate emergency access for emergency service operators. The department does not provide a quantitative threshold for determining significance. Too many factors mentioned in the methodology affect inadequate emergency access conditions. Instead, the department will determine significance on a project-by-project basis. However, the following examples are some of the circumstances, which may result in inadequate emergency access. This is not an exhaustive list of circumstances, under which, inadequate emergency access impacts would occur:

- a project would conflict with adopted city code regarding street widths and turning movements by modifying curb lines (e.g., sidewalk widening, bulb-outs, open spaces, mid-block crossings) that would substantially affect emergency service operator access (e.g., un-mountable curbs)
- a project would create new publicly-accessibility rights-of-way that restrict all emergency service operator access
- a project would install or relocate live overhead lines making off-site buildings that could require use of aerial ladder operations during emergencies inaccessible to emergency service operators
- a project would permanently add a physical barrier⁸ to a street restricting all vehicles, including emergency service operators, which would impede access to the surrounding area
- a project would close a street to all vehicles, including emergency service operators, which would impede access to the surrounding area
- a project would locate a garage entrance/exit on the same street as an emergency service operator facility and would add a substantial amount of vehicle trips that could not be accommodated⁹ by the garage entrance/exit resulting in queuing on the street near the emergency service operator's facility thereby blocking access to the facility

METHODOLOGY – CUMULATIVE

This section describes the typical geography, period, and methodology required to address the significance criterion. The section for cumulative only needs to expand upon the methodology section for

⁸ Permeant physical barriers refer to unmovable features that would not allow for emergency service operator vehicle access during an emergency (e.g., walls, inoperable bollards). Permanent physical barriers do not refer to physical features that an emergency service operator vehicle could mount or navigate around during an emergency (e.g., curbs such as raised bicycle facility or bulb out, a parking lane, cones, safe hit posts, operable bollards).

⁹ Accommodate refers to design of the facility (e.g., can vehicles be accommodated without queuing based upon throat length, gate location, etc.) and not the capacity (e.g., does the number of spaces accommodate the demand) of the facility as many variables affect the demand to and from a facility.

existing and existing plus project to the extent the methodology differs. The planning department will determine the appropriate methodology as necessary to inform the impact determination.

Basics

Geography

The geography for the cumulative impact analysis will typically be the same as that used for existing and existing plus project conditions given a project would only contribute to cumulative impacts to emergency access in that geography.

Period

The period for cumulative is typically the same as that used for existing and existing plus project conditions except projected out to a future year based upon reasonably foreseeable projects (see below for more details). Future year estimates should typically be between 10 and 25 years. In some instances, the most overall travel may occur at different periods (a.m., midday, post p.m. peak, and/or weekend) as a result of a cumulative project (e.g., a special event center), or the project may result in substantial disparity in travel demand at different periods. In these instances, and in consultation with the department, the methodology may substantiate the use of periods in addition to or other than the weekday p.m. peak.

Cumulative Projects

This sub-section describes the typical methodology for cumulative conditions. This sub-section also indicates in bracketed text [] whether the presentation of typical methodological elements in other sections of the transportation analysis (e.g., baseline, impact analysis) could occur in text, a figure, and/or a table.

List Approach or Projections

The methodology should include future estimates of people driving. To arrive at the future estimates, the methodology may qualitatively describe them, rely on estimates from other studies or sources in combination with the project's study, use a list of cumulative projects in the study area or vicinity or use travel demand models, such as the San Francisco County Transportation Authority's San Francisco Chained Activity Modeling Process (SF-CHAMP). The methodology must identify which approach the analysis uses and may include a modified approach. [text, figure, table]

The department will decide whether the methodology should use a list-based, or projections-based or modified approach. For these approaches, the department typically defines reasonably foreseeable projects as:

List-Based:

- An infrastructure project listed in the latest adopted region's Sustainable Communities Strategy
- An infrastructure project listed in the Countywide Transportation Plan, San Francisco's Capital Plan, or a San Francisco agency's (e.g., San Francisco Municipal Transportation Agency) Capital Improvement Program
- An infrastructure, private development project, or area plan project is actively undergoing environmental review, recently completed environmental review, or is anticipated to undertake environmental review in the near future because sufficient project definition is established

Projections-Based:

- Land use growth based upon estimates of projections developed in preparation of region's Sustainable Communities Strategy (which is typically a compilation of the list-based projects above)

Modified:

- Any combination of the types of projects described under the list-based and projections-based project types.

Street Characteristics

The methodology must adjust projections or street conditions based on reasonably foreseeable projects. [text, figure] The methodology must document rationale for adjustments and describe changed conditions, in consultation with the department. Examples include:

- a project proposes modifying curb lines such as sidewalk widening and bulb-outs
- a project proposes changing the street network
- a project closes off or renders existing facilities for emergency service operators challenging to use
- a substantially large development project proposes entrance and exit locations on the same street as an emergency service operator facility

CUMULATIVE

The cumulative subsection will present (text, figure, or table) the applicable elements included in the methodology.

IMPACT ANALYSIS – CUMULATIVE

This section ties the methodology and description of cumulative conditions together to address the significance criterion for cumulative conditions.

Basics

For the significance criterion for which the project has an impact¹⁰, the analysis must (in the order presented):

- 1) Address whether the project in combination with the reasonably foreseeable projects (i.e., cumulative projects) results in a significant impact. The discussion shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the existing plus project impact analysis. The discussion of cumulative impacts shall focus on the cumulative impact to which the identified other projects contribute (e.g., the examples provided in the methodology – cumulative section) rather than the attributes of other projects which do not contribute to the cumulative impact. The impact analysis shall assume the projects will comply with laws and regulations and the analysis shall describe how compliance would occur, what it would entail, and how it may lessen impacts.
- 2) Identify an impact finding without mitigation for the cumulative projects: less-than-significant impact or a significant impact. Ensure that step 1 substantiates the rationale for that impact

¹⁰ No cumulative analysis is required for each significance criterion if the existing plus project impact analysis found no impact. However, if the analysis found less than significant impacts, then an analysis of cumulative impacts are required for each significance criterion.

finding. Cumulative walking impacts should use the same methodology as existing plus project conditions, which includes a combination of a quantitative and qualitative approach.

- 2.A) If the cumulative projects would result in a less-than-significant cumulative impact, the impact analysis is complete.
 - 2.B) If the cumulative projects would result in a significant cumulative impact, identify whether the project's contribution is cumulatively considerable.
 - 2.C) If the project would not contribute considerably to the significant cumulative impact, the impact analysis is complete.
 - 2.D) If the project would contribute considerably to the significant cumulative impact, if applicable, introduce the title of a mitigation measure in paragraph form to reduce the impact. Briefly describe the nexus and rough proportionality to the extent applicable between the mitigation measure and the impact. Then, determine an appropriate mitigation measure considering the project's fair share contribution to impact, after consulting with the department on the appropriate fair share amount methodology. Briefly describe how the measure would reduce the impact, and briefly analyze any potential environmental impacts from the mitigation measure itself.
- 3) If the impact requires mitigation, begin the text of the mitigation measure with its title. Measure text should clearly explain who is responsible for what and where and when. Mitigation measure text should attempt to reduce the impact below the threshold of significance. The mitigation measure should also describe the project's fair share contribution.
 - 4) If the project would contribute considerably to the significant cumulative impact, if applicable, identify the conclusion impact finding: less than significant with mitigation, significant and unavoidable, or significant and unavoidable with mitigation.

Inadequate Emergency Access

The impact analysis must address whether the cumulative projects plus the proposed project would result in inadequate emergency access for emergency service operators. The same examples as provided for existing plus project conditions apply here, except for cumulative conditions.

OTHER

The guidance provided in this memorandum assumes a land use development project located outside of an area plan that requires a transportation impact study. This section describes the type of additional or different information that may be necessary to address emergency access impacts for the following circumstances: land use development project located within an area plan, an area plan, or infrastructure project. In addition, this section describes the extent to which a code compliance analysis and/or a discussion of policy inconsistencies may be necessary.

Land Use Development Project Located within an Area Plan

For projects that are consistent with an area plan, pursuant to CEQA Guidelines section 15183, the assessment must limit its analysis to such conditions specified in that section. The assessment must include a project description, discussion of existing baseline conditions (including infrastructure changes), and analysis of existing plus project and cumulative conditions. Typically, the assessment will use the significance criterion and approach identified herein and identify if there are any mitigation or improvement measures applicable from the area plan environmental impact report that should apply to the project. Cumulative impact analysis shall be limited to assess if new cumulative projects that were not known at the time of the environmental impact report (EIR) certification and, if applicable, whether any new impacts would occur from those cumulative projects.

As of September 2018, the Planning Commission certified the following area plan EIRs (in order of certification): Rincon Hill, Market & Octavia, Visitation Valley, Balboa Park Station Area Plan, Eastern Neighborhoods (Mission, Showplace Square/Potrero, Central Waterfront, East SoMa), Treasure Island, Glen Park, Transit Center District Plan, Western SoMa, and Central SoMa. None of the area plan EIRs identified significant impacts on emergency access.

Area Plans

For area plans, the assessment will typically use the significance criterion identified herein. The following sub-sections describe the type of additional or different information that may be necessary to address emergency access impacts for project description, methodology, and impact analysis. For area plans that also include infrastructure changes (e.g., street redesigns), please see the Infrastructure Project sub-section for additional or different information that may be necessary.

Project Description

Typically, the department conducts an analysis to estimate the amount of future development that could occur in the plan area as a result of its implementation. The department typically does not have all the project description details described herein. However, the project description may include policies that may relate to the methodology and impact analysis (e.g., location and dimensions of proposed bike lanes, removal of on-street parking, sidewalk widenings or other proposed street network changes).

Methodology

The assessment will typically use the same methodology identified herein, except the methodology will use a larger geographical study area and require less site-specific information (e.g., driveway locations at each site) except to document circumstances where vehicles may not be allowed (e.g., curb cut restrictions). While an individual project may not require some elements listed in the Methodology – Existing and Existing plus project section, area plans typically will include all of these elements. The department should select sidewalks, streets, and intersections most impacted by the area plan to represent the impacts that may occur at other locations. In addition, the analysis should identify the location of any emergency service operator facilities within the study area.

Impact Analysis

For analysis of area plans, assess the projected amount of growth and infrastructure changes associated with the rezoning within the area plan boundaries. The analysis of potentially inadequate emergency access impacts should be similar to that described under the Impact Analysis - Existing plus Project and Impact Analysis - Cumulative sections. The analysis should assume individual land use development projects within the area plan would be subject to property specific infrastructure changes (e.g., Better Streets Plan).

While individual projects may result in more localized emergency access impacts, an area plan could generate a substantial volume of vehicle traffic which could lead to emergency access impacts at the area plan level. The analysis of emergency access impacts in area plans should analyze the vehicle trips that could be generated across the plan area in combination with infrastructure changes (e.g., street redesigns) proposed as part of the area plan. This would typically be a qualitative analysis. Given the potential time gap between land use development and completion of infrastructure changes, the analysis should also discuss the potential short-term effects of that potential time gap.

Examples of circumstances that would result in significant impacts are described under Impact Analysis – Existing Plus Project.

Infrastructure Project

For infrastructure projects (e.g., new roads, bridge repair, sewer and water lines, rail service, roadway modifications, bicycle lanes etc.), the assessment of the project description, significance criteria, and impact analysis should be similar to private development projects. The analysis typically does not require trip generation analysis as infrastructure projects usually do not generate trips.¹¹ However, some infrastructure projects may induce trips, such as the addition of through lanes on existing or new highways or streets.¹² In addition, infrastructure projects may generate short-term trips due to construction workers and vehicles accessing the project site.

Project Description

The project description must describe the typical physical, additional physical, and programmatic features for existing and project conditions, as applicable. The project description must provide the geographic boundaries of the project and street cross sections.

Methodology

The assessment will typically use the same methodology identified herein, except the methodology will pay particular attention to proposed closures and rerouting.

Impact Analysis

The analysis of potentially hazardous conditions and accessibility impacts should be similar to that described under the Impact Analysis - Existing plus Project and Impact Analysis - Cumulative sections.

Inadequate Emergency Access

Examples of circumstances that would result in significant impacts are described under Impact Analysis – Existing Plus Project.

Compliance with the Planning Code, Policies, and Other Projects

The Planning Code does not include any requirements for emergency access. Emergency access requirements are addressed during building permit review. The San Francisco Department of Building Inspection, the San Francisco Fire Department, the San Francisco Public Utilities Commission, and Public Works reviews projects for compliance with city and state regulations such as building standards, fire protection, water connections for fire hydrants, and hydrology requirements for adequate water pressure. As part of building permit review the San Francisco Fire Department assesses the ability of fleet vehicles to access the public right of way on new or altered streets and from their facilities, or whether emergency service operators have adequate access to a building's entrances and exits from the curb line.

In addition, the San Francisco Fire Department, and other city agencies as part of the Transportation Advisory Staff Committee, reviews project changes in the public right-of-way.

¹¹ Governor's Office of Planning and Research, *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, January 20, 2016.

¹² Generally, minor transportation projects would not result in additional trips. Examples include, but are not limited to, rehabilitation, maintenance, and repair of transportation infrastructure; installation, removal or reconfiguration of non-through traffic lanes and traffic control devices; removal of through lanes; installation of traffic calming measures and wayfinding; removal of on- or off-street parking. Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, November 2017.