



SAN FRANCISCO PLANNING DEPARTMENT

Certificate of Determination EXEMPTION FROM ENVIRONMENTAL REVIEW

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Case No.: 2010.0420E
Project Title: 3155 Scott Street (aka 3151 Scott Street)
Zoning: NC-3 (Moderate-Scale Neighborhood Commercial) District
40-X Height and Bulk District
Block/Lot: 0937/001
Lot Size: 3,436 square feet
Project Sponsor: Hershey Hirschkop and David Schnur, Community Housing Partnership
(415) 929-2470
Staff Contact: Andrea Contreras – (415) 575-9044
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PROJECT DESCRIPTION:

The project site is located at the southwest corner of Lombard and Scott Streets in the Cow Hollow neighborhood of the Marina District in San Francisco, on the block bounded by Lombard Street to the north, Scott Street to the east, Greenwich Street to the south, and Divisadero Street to the west. The approximately 3,436 square-foot project site is currently occupied by a three-story, 40-foot-tall, 8,125-square-foot tourist hotel with 275 square feet of ground-floor retail. There is currently no off-street

[Continued on the next page.]

EXEMPT STATUS:

General Rule Exclusion (State CEQA Guidelines, Section 15061(b)(3))

REMARKS:

Please see next page.

DETERMINATION:

I do hereby certify that the above determination has been made pursuant to State and Local requirements.

Bill Wycko
Environmental Review Officer

July 29, 2010
Date

cc: H. Hirschkop and D. Schur, Project Sponsor
S. Perdue & A. Contreras, Planning Dept.
David Lindsay, NW Quadrant, Planning Dept.
Michela Alioto-Pier, District 2, Board of Supervisors

V. Byrd, Bulletin Board and Master Decision File
Exclusion/Exemption File
Historic Preservation Distribution List
Distribution List

PROJECT DESCRIPTION (continued):

parking or usable open space on site. The proposed project is the rehabilitation of the building, including minor exterior and interior alterations to convert its use from a 29-room tourist hotel to up to 24 units of group housing and one manager's unit, for a total of 25 residential units. The proposed residential use would provide permanent affordable housing to Transition-Age Youth ages 18-24 that are at-risk of homelessness, including youth aging out of foster care, and one manager.

The project would rehabilitate the existing building through interior and exterior alterations. The ground floor would be remodeled to include a lobby, property management office, tenant services office, program room, community kitchen with adjacent dining area/tenant lounge, laundry room, public restroom, and bicycle storage space. On the two upper residential floors, rooms that currently lack bathrooms would be renovated into units with bathrooms. Building systems would be upgraded to the City's latest seismic, fire, life-safety, building and accessibility codes, including sprinkler installation. The building is currently inaccessible to wheelchairs and does not have an elevator. Accessibility improvement would be made as determined by the City to ensure compliance with Americans with Disabilities Act (ADA). Seismic structural modifications are planned as deemed necessary by a qualified structural engineer. Cosmetic improvements would also be made.

The proposed project is inconsistent with the following requirements of the existing NC-3 zoning: a density of a minimum of one bedroom per 210 square feet of lot area for group housing; a rear yard that is at least 25 percent of the depth of the property but no less than 15 feet; usable open space of approximately 35 square feet per bedroom; and off-street parking of one space per three bedrooms plus manager's unit. The project sponsor proposes that the project have a density of one bedroom per 143 square feet; no rear yard; no usable open space; and no parking. The absence of a rear yard, usable open space, and parking are existing conditions on the project site, and could be addressed with a variance; the density of group housing can not be increased through use of a variance. The current density requirements under NC-3 only permit 16 group housing units (bedrooms). Therefore, it is necessary for the project sponsor propose establishment of the Lombard and Scott Street Affordable Group Housing Special Use District to allow a higher density of group housing units (24) than currently permitted under NC-3 zoning (16 units, or one unit per 210 square feet of lot area) with no open space requirement, no rear yard requirement, and no parking requirement. The proposed project would not expand the existing building envelope. Project approvals include Zoning Map and a Planning Code Text Amendments.

REMARKS

Land Use:

The 3,436-square-foot project site is located in the Cow Hollow neighborhood of the Marina District in San Francisco. The existing building on the site is currently occupied by a three-story, 29-room tourist hotel (the "Edward II Inn and Suites"), which was built in 1914. Land uses in the project vicinity include mostly commercial uses surrounded and interspersed with residential and mixed use residential uses.

The project site is within a Neighborhood Commercial District, Moderate Scale (NC-3), which spans Lombard Street between Lyon Street and Van Ness Boulevard.

The project, creation of an SUD that would allow an affordable group housing development of approximately 24 dwelling units and one manager's unit, would result in an increase in allowable density on the project site, given that the current zoning permits up to 16 group housing dwelling units. The existing building on the project site has 29 tourist hotel rooms, or five more rooms than the proposed number of group housing units (the proposed units would comprise a single room plus a bathroom). The proposed project would not alter the general land use pattern or physical character of the immediate area, which includes one- to four-story residences, apartment buildings, mixed-use residential buildings, and commercial businesses. The project would not disrupt or divide the neighborhood, since the building envelope would remain unchanged within the existing block configuration.

Although the project would require the creation of a Special Use District to allow increased residential density, it would generally be consistent with the NC-3 zoning district, which allows for group housing residential use, and with the existing density of uses on the site. The project would also be generally consistent with other applicable policies in the General Plan.

While the SUD does not require open space or parking for the group housing use, this would not result in an adverse effect on the environment for the reasons discussed in applicable sections of this certificate.

The project would not result in any significant cumulative land use or planning impacts, since it would cause no change in the mix of land uses in the vicinity, and thus could not contribute to any overall change in neighborhood character or any overall conflict with applicable environmental plans. For the reasons stated above, the project does not have the potential to result in a significant land use impact.

Aesthetics and Visual Quality:

The Edward II Inn and Suites currently occupies the project site. The proposed project would entail minor façade alterations, including the removal of the existing hotel blade signage, new paint on the protruding vertical forms, new paint on the façade, a new awning at the corner, and at the ground floor new wood panel window framing and a new wood panel base. The effects of these alterations on the historic character of the building are discussed in the Historical Resource section on page 4. Design and aesthetics are by definition subjective, and open to interpretation by decision-makers and members of the public. The proposed project would not expand the building envelope. The proposed changes would not substantially degrade the existing visual quality or character of the surrounding site.

Exterior lighting at building entryways would be positioned to minimize glare, and lighting would not be in excess of that commonly found in urban areas. The project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Therefore, environmental effects of light and glare due to the project would not be significant.

A project would be considered to have a significant adverse effect on visual quality if it would cause a substantial and demonstrable negative change. The project would not cause such a change. Based on the analysis above, the project would not result in significant adverse effects on visual quality or aesthetics.

Population and Housing:

The existing hotel use contains 29 rooms on site, each room temporarily housing one to four guests for an occupancy range of 29 to 58 or more guests, depending on occupancy. The proposed new project would result in a new permanent source of affordable housing for approximately 24 low-income at-risk youth and one manager, for a total of 25 residents. The building is located in an urbanized area and would not be expected to substantially alter existing development patterns or plans as outlined in the San Francisco General Plan. Policy 8.6 of the 2009 Draft Housing Element of the General Plan notes that transitional housing facilities are in short supply and the City should support innovative forms of housing. The project would provide housing and social support programs for young people at-risk, thereby increasing the housing stock for this population group with supporting housing needs and addressing the need for transitional housing facilities.

A project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not approved and implemented. Although the project would convert hotel rooms to residential units, the anticipated visitor and employee increase as a result of the supportive services would not create substantial new employment-based housing demand because the proposed uses are anticipated to be primarily oriented towards existing residents. It is estimated that the population of the project would be approximately 30, which include 25 residents and five employees. There would be about two to three employees on site during the day and evening, and one employee on site a night.¹ This residential and employment population increase, if any, would be small and would not generate a substantial demand for additional housing the context of Citywide population or employment growth. Compared to existing conditions, project-specific impacts would not be significant relative to the number of area-wide residents and employees in the project vicinity, and would not change substantially relative to the number of people currently populating the project site. The project would not directly or indirectly result in a significant increase in population. Thus, project-related impacts with respect to population growth would not be significant.

Historical Resources:

In evaluating whether the proposed project would be exempt from environmental review under CEQA, the Planning Department must first determine whether the building at 3155 Scott Street (aka 3151 Scott Street) is an historical resource as defined by CEQA. In a Historic Resource Evaluation Response memorandum (HRER) dated June 17, 2010, the Planning Department determined that the subject property is not an historical resource. The June 2010 HRER serves as the source for the following historical resources discussion.

The subject property does not appear to be eligible for listing on the California Register of Historic Places either as an individual resource or as a contributor to a historic district. The existing building at 3151 Scott Street is not listed on any historic resource surveys or any local, state or national registries. The Marina District is characterized by multiple unit apartment buildings intermixed with single-family dwellings and some commercial buildings along Chestnut and Lombard Streets. The boundaries of the neighborhood are generally Marina Boulevard to the north, Lombard to the south, Van Ness to the east,

¹ Personal communication with the project sponsor, July 19, 2010.

and the Presidio to the west. The predominant architectural styles are Mediterranean or Spanish Revival with a few Exotic Revival buildings.

The area upon which the Marina District is located was primarily marchland and lagoon prior to its fill for the 1915 Panama-Pacific International Exposition (PPIE). The land was filled with dredged material and earthquake debris to create a site of about 635 acres for the PPIE. Rail lines were extended to the area as a result of the PPIE. This increased accessibility encouraged development of the area after the closure of the PPIE. The first large scale residential development in the Marina District occurred in the early 1920s. By 1930's, approximately three-quarters of the District's parcels were built out, housing about 25,000 people. The construction of the Golden Gate Bridge in 1937 spurred the widening of Lombard Street and attracted motels and auto-related businesses to the corridor.

Planning Staff determined that the project site does not appear eligible for listing on the California Register because it does not appear to be associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States (Criterion 1); it does not appear to be associated with the lives of persons important in our local, regional, or national past (Criterion 2); it does not embody the distinctive characteristics of a type, period, region, or method of construction, nor does it represent the work of a master or possess high artist values (Criterion 3); and finally, the project site does not likely yield information important in prehistory or history (Criterion 4). The building at 3155 Scott Street is indirectly associated with both the PPEI and the opening of the Golden Gate Bridge by its location and construction date. However, the building does not strongly represent the development of or events of the fair or the bridge opening. Both events are better represented by other buildings and structures still existing within the City. Thus, the building does not appear eligible for listing under Criterion 1. Research into the building's history does not indicate that any of the owners or others associated with the building were historically important individuals. Therefore, the building does not appear eligible for listing under Criterion 2. The building at 3155 Scott Street was designed by Charles J. Rousseau. The building is not a strong representative of his work due to extensive alterations to the building. Due to the alterations, the building is not a strong representative of the Spanish Revival style or hotel building type from the early 20th century. Planning staff has determined that the building retains integrity of location, association, workmanship, and feeling, but does not retain sufficient integrity of design, setting, or materials to convey historical significance due to the demolition of approximately one-fifth of the building's original volume, the alteration of the building's storefronts, and the widening of Lombard Street. Therefore, the building does not appear eligible for listing under Criterion 3 as an individual resource.

The building also does not appear to be eligible for listing as a contributor to a potential historic district. While portions of the Marina District contain significant individual buildings, there does not appear to be a significant concentration of such buildings in this area to qualify for listing on the California Register as a historic district. Therefore the proposed project would not have an adverse effect on any off-site historical resources.. Significant ground disturbance caused by the infilling of the marsh land and lagoon at the turn of the century would likely have disturbed any pre-existing archeological sites, eliminating the potential for the site to be a significant contributor of pre-historical or historical information. As a result, the proposed project would not result in a significant impact on historical resources.

Transportation:

Based on the Planning Department's 2002 Transportation Impact Analysis Guidelines for Environmental Review (*SF Guidelines*) the current hotel use creates approximately seven trips per room per day, with 10% occurring during PM peak hour (4 PM to 6 PM). The 29-room hotel at the project site currently generates about 203 person trips per day, about 117 daily vehicle trips, and approximately 12 vehicle trips in the PM peak hour, assuming the transportation mode split of the census tract in which the project site is located. According to *SF Guidelines*, residential use of one bedroom or studio generate about seven and a half trips per room per day, with 17.3% occurring during PM peak hour. This proposed 25-unit residential use would generate approximately 188 person trips per day, about 108 daily vehicle trips, and approximately 19 vehicle trips in the PM peak hour. Due to a decrease in number of units/rooms on-site, the proposed project would result in an overall net decrease in daily person and vehicle trips. However, because of a slight increase in frequency of trips, the proposed project would result in a net increase of approximately seven vehicle trips concentrated during the PM peak hour. The net increase in seven vehicle trips would not be sufficient to result in a significant traffic impact.

There are currently four Muni bus lines within a two block radius of the project site (28-19th Avenue, 30-Stockton, 43-Masonic, and 76-Marin Headlands), and three additional lines within a three block radius (22-Fillmore, 41-Union, and 45-Union-Stockton). The current tourist hotel use generates approximately six PM peak hour transit trips. The proposed use would generate about nine PM peak hour transit trips according to the *SF Guidelines*. The net increase in three transit trips at peak hour would be easily accommodated on the six (76-Marin Headlands runs on Sundays only) surrounding transit lines.

The proposed project would cause a minimal increase in the number of walking and cycling trips, which can be accommodated by existing street and sidewalk conditions. There are three bicycle routes within three blocks of the project site (Routes #4, #6, and #45).

The loading demand for both uses is less than one space for peak hour trips. Per Section 152 of the Planning Code, an off-street loading space is not required for hotels or apartments under 100,000 square feet.

San Francisco does not consider parking supply as part of the permanent physical environment. 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.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (CEQA Guidelines § 15131(a).) The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, 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 in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter 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." As mentioned above, there are seven Muni lines and three bicycle routes within three blocks of the project site.

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. Moreover, 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. Hence, any secondary environmental impacts which 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, reasonably addresses potential secondary effects.

Construction needed for the proposed alterations would be temporary, and would change on a daily basis over the construction period. These effects would not have the potential to substantially deteriorate the level of service in the area, and would not have the potential to be significant.

Noise:

An approximate doubling of traffic volumes in the area would be necessary to produce an increase in ambient noise levels noticeable to most people. The project would not cause a doubling in traffic volumes. The project's marginal increase to the existing volumes during the PM peak hour (see Transportation, p. 5), would not cause a noticeable increase in the ambient noise level in the project vicinity.

The Environmental Protection Element of the *San Francisco General Plan* contains Land Use Compatibility Guidelines for Community Noise. These guidelines indicate that residential development should be discouraged at noise levels above 70 dBA (L_{dn}).^{2,3} Where noise levels exceed 65 dBA, a detailed analysis of noise reduction requirements would normally be necessary prior to final review and approval, and new construction or development of residential uses would require that noise insulation features included in the design. In addition, Title 24 of the *California Code of Regulations* establishes uniform noise insulation standards for residential projects. Based on modeling of traffic noise volumes conducted by the San Francisco Department of Public Health (DPH), the traffic noise level in the project area vicinity is generally around 65 dBA and 70 dBA.⁴ Therefore, the proposed project would locate new residential

² 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, in a method known as A-weighting and expressed in units of A-weighted decibels (dBA).

³ The guidelines are based on maintaining an interior noise level of interior noise standard of 45 dBA, L_{dn}, as required by the California Noise Insulation Standards in Title 24, Part 2 of the California Code of Regulations.

⁴ Traffic Noise Map presented by the Department of Public Health website:
<http://www.sfdph.org/dph/files/EHSdocs/ehsPublstdocs/Noise/noisemap2.pdf>.

units—considered to be “sensitive receptors”—in an environment with noise levels above those considered normally acceptable for residential uses, and the project sponsor would be required by the *San Francisco General Plan* and by Title 24 to incorporate noise insulation features in the project to maintain an interior noise level of 45 dBA. The Department of Building Inspection would review project plans for compliance with Title 24 noise standards. Compliance with Title 24 standards and with the *General Plan* would ensure that effects from exposure to ambient noise would not result in significant impacts.

The noise generated by the occupants of the proposed new use would be considered common and generally acceptable in an urban area, would be expected to be similar to the noise generated by current users of the site, and would not be considered a significant impact. The proposed construction could temporarily generate noise that may be considered an annoyance by occupants of nearby properties. Construction noise is regulated under Article 29 of the City’s Police Code, and would be temporary and intermittent in nature. Thus, the proposed project would not result in a significant impact with respect to noise.

Air Quality:

The California Air Resources Board (ARB) established its statewide comprehensive air toxics program in the early 1980s. The ARB created California’s program in response to the Toxic Air Contaminant Identification and Control Act (AB 1807, Tanner 1983) to reduce exposure to air toxics. The ARB identifies 244 substances as toxic air contaminants (TACs) that are known or suspected to be emitted in California and have potential adverse health effects. Public health research consistently demonstrates that pollutant levels are significantly higher near freeways and busy roadways. Human health studies demonstrate that children living within 100 to 200 meters of freeways or busy roadways have poor lung function and more respiratory disease; both chronic and acute health effects may result from exposure to TACs. In 2005, The ARB issued guidance on preventing roadway related air quality conflicts, suggesting localities “avoid siting new sensitive land uses within 500 feet of a freeway [or other] urban roads with volumes of more than 100,000 vehicles/day.”⁵ However, there are no existing federal or state regulations to protect sensitive land uses from roadway air pollutants.

The San Francisco Department of Public Health (DPH) has issued guidance for the identification and assessment of potential air quality hazards and methods for assessing the associated health risks.⁶ Consistent with ARB guidance, DPH has identified that a potential public health hazard for sensitive land uses exists when such uses are located within a 150-meter (approximately 500-foot) radius of any boundary of a project site that experiences 100,000 vehicles per day. To this end, San Francisco added Article 38 of the San Francisco Health Code, approved November 25, 2008, which requires that, for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by DPH, an Air Quality Assessment be prepared to determine whether residents would be exposed to potentially unhealthy levels of PM_{2.5}. Through air quality modeling, an assessment is conducted to determine if the annual average concentration of PM_{2.5} from the roadway sources would exceed a concentration of 0.2

⁵ California Air Resources Board, *2005 Air Quality and Land Use Handbook: A Community Health Perspective*, <http://www.arb.ca.gov/ch/landuse.htm>, accessed September 8, 2008.

⁶ San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 6, 2008, http://dphwww.sfdph.org/phes/publications/Mitigating_Roadway_AQLU_Conflicts.pdf, accessed September 8, 2009.

micrograms per cubic meter (annual average).⁷ If this standard is exceeded, the project sponsor must install a filtered air supply system, with high-efficiency filters, designed to remove at least 80 percent of ambient PM_{2.5} from habitable areas of residential units.

The project site, at 3151 Scott Street is located within the Potential Roadway Exposure Zone, as mapped by DPH. Pursuant to Article 38 of the San Francisco Health Code, the project sponsor shall prepare an Air Quality Assessment consistent with DPH guidance. The Air Quality Assessment must be submitted to the Director of DPH. Should the Air Quality Assessment conclude that the PM_{2.5} concentration at the site is greater than 0.2 micrograms per cubic meter, the project shall be designed and constructed such that ventilation systems remove at least 80 percent of the PM_{2.5} pollutants from habitable areas. The project would be required to comply with Article 38 of the San Francisco Health Code and therefore, the project would not result in a significant impact from exposure of sensitive receptors to high concentrations of roadway-related pollutants.

The proposed project would not have the potential to result in a significant net increase the amount of greenhouse gas emissions from its construction or operation.

Recreation:

The current project site does not include open space. The proposed project would not provide any open space. Residents of the proposed project could use the following nearby open space for recreation: Marina Green (five blocks north of project site), George R. Moscone Recreation Center (five blocks northeast of project site), the grounds of the Palace of Fine Arts (7 blocks northwest of the project site) and the Presidio (4 blocks west of the project site). An increase in potentially 25 new users of these recreational facilities would not have the potential to result in their degradation or the need to construct new facilities to serve the increase in population.

Utilities and Service Systems:

The project site is within an urban area that is served by utilities and service systems, including water, wastewater and storm water collection and treatment, solid waste collection and disposal, gas and electricity. The proposed project would add permanent residential units to the site than currently exist, which might result in a slight net increase in the demand for utilities and service systems on the site, but not in excess of amounts expected and provided for in the project area. No new water delivery or wastewater collection and treatment facilities would be required to serve the project. Project solid waste would be collected, recycled, and disposed of within facilities that have adequate capacity. The proposed project would not be expected to have any substantial impact on public services or utilities.

Public Services:

⁷ According to DPH, this threshold, or action level, of 0.2 micrograms per cubic meter represents about 8 – 10 percent of the range of ambient PM_{2.5} concentrations in San Francisco based on monitoring data, and is based on epidemiological research that indicates that such a concentration can result in an approximately 0.28 percent increase in non-injury mortality, or an increased mortality at a rate of approximately 20 “excess deaths” per year per one million population in San Francisco. “Excess deaths” (also referred to as premature mortality) refer to deaths that occur sooner than otherwise expected, absent the specific condition under evaluation; in this case, exposure to PM_{2.5}. (San Francisco Department of Public Health, Occupational and Environmental Health Section, Program on Health, Equity, and Sustainability, “Assessment and Mitigation of Air Pollutant Health Effects from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review, May 6, 2008. Twenty excess deaths per million based on San Francisco’s non-injury, non-homicide, non-suicide mortality rate of approximately 714 per 100,000. Although San Francisco’s population is less than one million, the presentation of excess deaths is commonly given as a rate per million population.)

The proposed project could bring additional residential use to the project area, with potential for a small net increase in the population of the project site. The increased intensity of uses could potentially increase the service calls to the San Francisco Police Department (SFPD). However, there is no evidence that the proposed project would lead to an increase in police calls. The project site is in the Northern Metro jurisdiction of the SFPD. The closest police station is the Northern Police Station at 1125 Fillmore Street, approximately 1.5 miles from the project site.⁸ Given the scale of the proposed project, it would not necessitate the construction of a new police station which could result in a potential environmental impact.

Geology and Soils:

The project site is in an area subject to ground shaking from earthquakes along the San Andreas and Northern Hayward Faults and other faults in the San Francisco Bay Area. The project is not in a liquefaction zone. Implementation of Department of Building Inspection requirements would ensure that the project would not have a significant impact related to geologic hazards.

Flood Hazard:

The site is not within a flood hazard area as mapped on the federal Flood Hazard Boundary or Flood Insurance Rate Maps. The site is not subject to flooding by failure of a levee or dam. Thus the project would have no impacts regarding flood hazards.

Hazardous Materials:

Section 19827.5 of the *California Health and Safety Code* requires that local agencies not issue alteration permits until an applicant has demonstrated compliance with notification, removal and abatement requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. These regulations and procedures that are an established part of the building permit review process would ensure that any potential impacts due to asbestos removal would not be significant.

Work that could result in disturbance of lead paint must comply with Section 3423 of the San Francisco Building Code. These regulations and procedures set forth in the San Francisco Building Code would ensure that potential impacts due to lead-based paint removal would not be significant.

In addition to lead-based paint, hazardous polychlorinated biphenyls (PCBs) were frequently used in fluorescent light fixtures manufactures prior to 1978. Due to the small size of the structure and the limited potential for PCB-containing light fixtures, it is unlikely that the potential impact from PCBs would be significant.

Emergency Access:

San Francisco ensures fire safety and emergency accessibility within new and existing development through provisions of its Building and Fire Codes. The project would conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for the proposed development. Potential fire hazards would be addressed during the permit review process. Conformance with these standards would ensure appropriate life-safety protections for the residential structure.

⁸ San Francisco Police Department website: <http://sf-police.org/index.aspx?page=825>

Neighborhood Concerns

A "Notification of Project Receiving Environmental Review" was mailed on June 29, 2010 to potentially interested parties. CEQA-related comments included the following topics: land use, particularly change in character of the vicinity; change of use; consistency with applicable land use plans, polices, and zoning ordinances; residential density; and open space. Other CEQA-related comments include aesthetics and visual quality; population and housing; historic resources issues; transportation (traffic, transit, pedestrian density, and parking); noise; air quality; greenhouse gas emissions; geology and soils; flood hazard; and hazardous materials. These concerns are addressed in the above text by topic heading.

There were numerous non-CEQA related comments, some of which are addressed in other stages of project review such as consideration of project approvals or building permit review. They include the following: economic issues, such as the loss of tax revenue and decrease in property values; social issues including the nature of programs being offered to youth, a change in neighborhood demographics, and the potential for increased crime; Building Code issues, particularly overcrowding; ADA and Fire Code issues; and the need for an Institutional Master Plan.

Exempt Status

CEQA Guidelines Section 15061(b)(3) provides an exemption from environmental review where it can be seen with certainty that the proposed project would not have a significant impact on the environment. As noted above, the proposed zoning and text amendment would have no significant environmental effects on land use, aesthetics and visual quality, population and housing, historic resources, transportation, noise, air quality, greenhouse gas emissions, geology and soils, flood hazard, and hazardous materials. Since the proposed project would have no significant environmental effects, it is appropriately exempt from environmental review under the General Rule Exclusion (CEQA Guidelines Section 15061(b)(3)).