

# CHAPTER 5

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## Other CEQA Considerations

### A. Growth-Inducing Impacts

The *Western SoMa Community Plan* would be considered inherently growth-inducing. Although one of the primary features of the Draft Plan is the continuation of existing uses and stabilization of the Draft Plan Area, growth would occur during the 20-year buildout timeframe if the Draft Plan was adopted.

Proposed zoning changes would allow for increased population density and intensity of uses on some parcels in comparison to existing conditions. Changes in some areas would allow more growth than what is currently permitted. Similarly, increased height and bulk limits would allow for increased development intensity on some sites in the Draft Plan Area, such as on the 350 Eighth Street project site. Changes on specific parcels could potentially increase the value of a particular site, which could attract new development. Some sites within the Draft Plan Area may have less growth potential due to reductions in building height limits. Changes in zoning and height/bulk districts would be considered characteristics of the Draft Plan itself rather than growth-inducing impacts. The ultimate outcome of proposed changes described in the Draft Plan on a site-specific level is subject to the intentions of the property owners and developers with control over the parcels in the Draft Plan Area, which are largely impossible to predict over the 20-year timeframe.

The Rezoning of Adjacent Parcels is considered “cleanup” rezoning, with the intention of reconciling the use districts of these parcels with those of the neighboring properties and making them consistent with the zoning of the opposing block facades. The Rezoning of Adjacent Parcels does not specifically intend to induce growth on the Adjacent Parcels. However, the Rezoning of Adjacent Parcels could lead to larger buildings, since many of the Adjacent Parcels are not built to existing height limits and future development may take advantage of such limits. However, such growth would not be considered growth-inducing, as it would be appropriate and expected in this part of the city.

According to San Francisco Planning Department calculations, buildout of the Project Area without implementation of the Draft Plan and Rezoning of Adjacent Parcels would result in an increase in population of approximately 5,880 in 2030, as well as 5,300 new jobs. This estimated population growth in the Project Area represents approximately five percent of the growth anticipated in San Francisco in 2030 by the Association of Bay Area Governments (ABAG); employment growth would be about three percent of city-wide growth in 2030.<sup>1</sup> With implementation of the Proposed Project, the population in the Project Area is expected to increase by an additional 450 people and employment by about 1,070 jobs in 2030

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<sup>1</sup> Association of Bay Area Governments, *Projections and Priorities 2009: Building Momentum*, August 2009.

over the increases in population and employment that would occur without the implementation of the Proposed Project. Population and employment growth resulting from implementation of the Proposed Project would not correlate with significant adverse impacts in itself, but rather that growth could lead to secondary physical impacts. Those potential impacts are discussed in the applicable environmental analysis sections of this EIR.

## B. Significant Unavoidable Impacts

In accordance with Section 21067 of the California Environmental Quality Act (CEQA), and with Sections 15040, 15081, and 15082 of the CEQA *Guidelines*, the purpose of this section is to identify impacts that could not be eliminated or reduced to less-than-significant levels by mitigation measures included as part of the project, or by other mitigation measures that could be implemented, as included in Chapter 4, Environmental Setting, Impacts, and Mitigation Measures. This section is subject to final determination by the San Francisco Planning Commission as part of the CEQA finding for the EIR. If necessary, this chapter will be revised in the Final EIR to reflect the findings of the Planning Commission.

The following is a list of significant and unavoidable impacts identified in this EIR.

### Cultural and Paleontological Resources

**Impact CP-1:** The implementation of the Draft Plan and Rezoning of Adjacent Parcels (individually and in combination) could indirectly result in the demolition of individual historic architectural resources or contributing resources to a historic district located in the Project Area, causing a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.

**Impact C-CP-1:** The implementation of the Draft Plan and Rezoning of Adjacent Parcels, in combination with past, present, and reasonably foreseeable future projects in the vicinity, could encourage a development trend of demolition and alteration of historical resources, contributing considerably to significant cumulative historical resources impacts.

### Transportation and Circulation

**Impact TR-1a:** The Draft Plan would cause levels of service at the intersection of Fifth/Bryant/I-80 Eastbound on-ramp to deteriorate during the p.m. peak hour, thereby conflicting with an applicable congestion management program that establishes measures of effectiveness for the performance of the circulation system.

**Impact TR-1b:** The Draft Plan would cause levels of service at the intersection of Sixth/Brannan/I-280 ramps to deteriorate during the a.m. and p.m. peak hours, thereby conflicting with an applicable congestion management program that establishes measures of effectiveness for the performance of the circulation system.

**Impact TR-1c:** The Draft Plan would cause levels of service at the intersection of Eighth/Harrison/I-80 Westbound off-ramp to deteriorate during the p.m. peak hour, thereby conflicting

with an applicable congestion management program that establishes measures of effectiveness for the performance of the circulation system.

**Impact TR-5:** The Draft Plan's proposed transportation system improvements would remove on-street loading spaces along 12th Street that could not be located nearby and would thereby result in potential conflicts between trucks and other traffic.

**Impact C-TR-1a:** The Draft Plan, in combination with past, present, and reasonably foreseeable future projects would cause levels of service at local intersections to deteriorate and would conflict with an applicable congestion management programs as well as plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system.

**Impact C-TR-2:** The Draft Plan, in combination with past, present, and reasonably foreseeable future projects, would contribute considerably to exceedance of the capacity utilization standards for Muni under cumulative conditions.

### Noise and Vibration

**Impact C-NO:** The implementation of the Proposed Project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would contribute considerably to a significant cumulative noise impact.

### Air Quality

**Impact AQ-2:** Subsequent individual development projects in the Draft Plan Area and/or on the Adjacent Parcels (individually and in combination) could violate an air quality standard, contribute to an existing or projected air quality violation, and/or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard.

**Impact AQ-3:** The implementation of the Draft Plan and Rezoning of Adjacent Parcels (individually and in combination) would expose new sensitive receptors to substantial concentrations of fine particulate matter (PM<sub>2.5</sub>) and toxic air contaminants (TACs).

**Impact AQ-4:** The implementation of the Draft Plan and Rezoning of Adjacent Parcels (individually and in combination) would expose existing and future sensitive receptors to substantial levels of fine particulate matter (PM<sub>2.5</sub>) and toxic air contaminants (TACs) from new vehicles and equipment.

**Impact AQ-6:** The implementation of the Draft Plan and Rezoning of Adjacent Parcels (individually and in combination) would result in construction-period emissions of criteria air pollutants, including ozone precursors, from subsequent individual development projects that would contribute to an existing or projected air quality violation or result in a cumulatively considerable increase in criteria pollutants.

**Impact AQ-7:** The implementation of the Draft Plan and Rezoning of Adjacent Parcels (individually and in combination) would expose sensitive receptors to substantial levels of toxic air contaminants (TACs) generated by construction equipment.

- Impact AQ-11:** Construction of the 350 Eighth Street project would expose sensitive receptors to substantial levels of toxic air contaminants (TACs) generated by construction equipment.
- Impact C-AQ-1:** The implementation of the Proposed Project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would contribute considerably to cumulative air quality impacts from emissions of criteria air pollutants.
- Impact C-AQ-2:** The implementation of the Proposed Project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in cumulative exposure of sensitive receptors to substantial levels of toxic air contaminants (TACs).

### **Wind and Shadow**

- Impact WS-3:** The implementation of the Draft Plan and Rezoning of Adjacent Parcels (individually and in combination) would create new shadow in a manner that would substantially affect outdoor recreation facilities or other public areas.
- Impact C-WS-2:** The implementation of the Draft Plan and/or Rezoning of Adjacent Parcels, in combination with past, present and reasonably foreseeable future projects in the vicinity, could contribute considerably to a significant cumulative impact on shadow conditions.

## **C. Significant Irreversible Impacts**

In accordance with CEQA *Guidelines* Section 15126.2(c), this section discusses the significant irreversible environmental changes associated with the Proposed Project relevant to land use changes, non-renewable resources, and environmental accidents. Implementation of the Proposed Project would intensify the development of a range of land uses in the Project Area that would be consistent with development in an urban area.

### **Changes that Commit Future Generations to Similar Uses**

Development within the Project Area, including the 350 Eighth Street project, and on the Adjacent Parcels, would result in more intensive development on some parcels within the Western SoMa neighborhood. Although this more intensive development would not be irreversible, commitment to these uses would be difficult to overturn within the short term.

### **Use of Non-Renewable Resources**

Implementation of the Proposed Project would result in an irreversible commitment of energy resources, primarily in the form of fossil fuels, including fuel oil, natural gas, and gasoline or diesel fuel for automobiles and construction equipment, during construction and from ongoing activity in the Project Area. The consumption or destruction of other non-renewable or slowly renewable resources would also result during construction, occupancy, and use of the Project Area. These resources include, but are not limited to, lumber, concrete, sand and gravel, asphalt, masonry, metals, water, and those related

wastewater and solid waste disposal. Development within the Project Area would consume non-renewable resources in amounts typical of projects within urban areas.

## **Irreversible Damage from Environmental Accidents**

Irreversible damage could occur in the Project Area as a result of increased development in an area that is subject to seismic hazards. More intensive development of residences and businesses in the Project Area would expose larger numbers of people to death and injury in the event of a major earthquake in the Bay Area. New construction would be required to comply with current building codes in order to reduce seismic risks to less-than-significant levels.

## **D. Areas of Known Controversy and Issues to be Resolved**

The following list of concerns was noted in the public comments on the Notice of Preparation of the EIR:

- Emphasis on stabilization, prohibition, and preservation may serve to reinforce lack of residential density and neighborhood-serving amenities.
- Maximum housing production should be promoted.
- Retention of Residential Enclave District (RED) zoning will limit the potential for new housing.
- Prohibition of housing south of Harrison Street will result in land use impacts.
- The proposed six jobs created to one unit of housing and 70 percent market rate/ 30 percent affordable housing split will result in constraints on housing production.
- Historic districts will limit new development to the existing low density. An alternative that would create smaller districts and/or individual landmark designations should be considered.
- An alternative that includes higher heights and no restrictions on residential development above ground floor along major streets should be considered.
- The Western SoMa portion of the Fourth Street corridor should be severed from the proposed Draft Plan Area and implementing rezoning and studied separately along with the area west of Third Street.
- There are concerns regarding downzoning lots along Mission Street (between Seventh and 11<sup>th</sup> Streets).
- There are concerns regarding existing sources of noise.
- There are concerns regarding mobile and fixed sources of air quality hot spots and their relation to sensitive uses.
- Traffic collisions should be identified and their spatial distribution should be mapped to determine "hot spots," including roads and intersections, within the Draft Plan Area;

- Results of the 2003 San Francisco Municipal Transportation Agency PedSafe Analysis regarding Western SoMa should be reviewed.
- Existing pedestrian conditions analysis should include an evaluation based on the Pedestrian Environmental Quality Index.