Attachment A

California Environmental Quality Act Findings

PREAMBLE

In determining to approve the project described in Section I below (the "Project"), the San Francisco Planning Commission (the "Commission") makes and adopts the following findings of fact and decisions regarding the Project description and objectives, significant impacts, significant and unavoidable impacts, mitigation measures and alternatives, and a statement of overriding considerations, based on substantial evidence in the whole record of this proceeding and pursuant to the California Environmental Quality Act, California Public Resources Code Section 21000 et seq. ("CEQA"), particularly Section 21081 and 21081.5, the Guidelines for Implementation of CEQA, 14 California Code of Regulations Section 15000 et seq. ("CEQA Guidelines"), Section 15091 through 15093, and Chapter 31 of the San Francisco Administrative Code ("Chapter 31"). The Commission adopts these findings in conjunction with the Approval Actions described in Section I(c), below, as required by CEQA.

These findings are organized as follows:

Section I provides a description of the proposed Sunnydale-Velasco HOPE SF Master Plan project, the environmental review process for the Project, the City approval actions to be taken, and the location and custodian of the record.

Section II lists the Project's less-than-significant impacts that do not require mitigation.

Section III identifies potentially significant impacts that can be avoided or reduced to less-than-significant levels through mitigation and describes the disposition of the mitigation measures.

Section IV identifies significant project-specific or cumulative impacts that would not be eliminated or reduced to a less-than-significant level and describes any applicable mitigation measures as well as the disposition of the mitigation measures. The Final EIR/EIS identified mitigation measures to address certain of these impacts, but implementation of the mitigation measures will not reduce the impacts to a less than significant level.

Sections III and IV set forth findings as to the mitigation measures proposed in the Final EIR/EIS. (The Draft EIR/EIS and the Comments and Responses document together comprise the Final EIR/EIS, or "FEIR/FEIS"). Attachment B to the Planning Commission Motion contains the Mitigation Monitoring and Reporting Program ("MMRP"), which provides a table setting forth each mitigation measure listed in the FEIR/FEIS that is required to reduce a significant adverse impact.

Section V identifies the Project Alternatives that were analyzed in the EIR/EIS and discusses the reasons for their rejection.

Section VI sets forth the Planning Commission's Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

The MMRP for the mitigation measures that have been proposed for adoption is attached with these findings as **Attachment B** to this Motion. The MMRP is required by CEQA Section 21081.6 and CEQA Guidelines Section 15091. Attachment B provides a table setting forth each mitigation measure listed in the FEIR/FEIS that is required to reduce a significant adverse impact. Attachment B also specifies the agency responsible for implementation of each measure and establishes monitoring actions and a monitoring schedule. The full text of the mitigation measures is set forth in Attachment B.

These findings are based upon substantial evidence in the entire record before the Commission. The references set forth in these findings to certain pages or sections of the Draft Environmental Impact Report ("Draft EIR/EIS" or "DEIR/DEIS") or the Comments and Responses document ("C&R") in the Final EIR/EIS are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

I. PROJECT DESCRIPTION AND PROCEDURAL BACKGROUND

A. Project Description

The Project Sponsor proposes to demolish 775 existing public housing units, as well as other existing buildings at the Sunnydale and Velasco public housing complexes, and develop housing for a range of income levels for a total up to 925 net new units and 1,700 total units on the Project site.

The 48.8-acre project site is located in the Visitacion Valley neighborhood of San Francisco, and is bounded by Hahn Street on the east, Velasco Avenue on the south, and McLaren Park to the north and west. It includes Assessor's Block 6310-Lot 1, Block 6311-Lot 1, Block 6312-Lot 1, Block 6313-Lot 1, Block 6314-Lot 1, and Block 6315-Lot 1. The project site is adjacent to Gleneagles International Golf Course on the north. The golf course is a part of John McLaren Park, which occupies 317 acres and includes Herz Playground, Coffman Pool, and an assortment of playgrounds, athletic fields, tennis and basketball courts, as well as an outdoor amphitheatre, trails, open meadows, a lake, and a reservoir. Crocker Amazon Playground is to the west of the project site and includes play areas, athletic fields, tennis and basketball courts, a skateboard park, community garden, and recreation center. McLaren Park and Crocker Amazon Playground are zoned P (Public Use). The project site is adjacent to residential neighborhoods to the south and east. The surrounding neighborhood to the south and east is primarily zoned RH-1 (Residential House, one dwelling unit per lot), with one block (6320) zoned RH-2 (Residential House, two dwellings per lot) and several parcels zoned NC-1 (Neighborhood Commercial) to the east on Hahn Street.

The Project site currently comprises two public housing developments in San Francisco: Sunnydale and Velasco. There are currently 91 residential buildings in Sunnydale, comprised of 757 affordable family units, and two residential buildings in Velasco, comprised of 18 affordable senior units. In addition to the residential buildings, there is a 29,500 square foot building that provides daycare, youth programs, and maintenance services, and two outdoor playgrounds with a full-size basketball court.

The Sunnydale residential buildings were constructed in 1941 and consist of one-, two-, three-, four- and five-bedroom units. The buildings are aligned perpendicularly to the streets in large blocks of attached

units. The Velasco residential buildings were constructed in 1963 and consist of studio, one- and two-bedroom units. The two buildings are connected to one-another via a roof system and exterior walkways. All residential buildings in Sunnydale and Velasco are two-stories in height.

The proposed Project would replace all existing housing units and other buildings, including the community center building; incorporate additional family and senior housing homes into the community; and add amenities such as open space, retail opportunities, and neighborhood services. The completed project would occupy approximately 2,843,500 square feet of floor area for a net increase of 2,049,000 square feet. It would contain approximately 34 new two- to five-story development blocks. The height of the new buildings would range from 40 to 60 feet above ground level, with 18 buildings at 40 feet or less in height and 15 buildings at 50 feet in height, and one building at 60 feet in height.

Thirty-three of the buildings would contain family dwelling units; the single building at 60 feet in height would contain senior housing and would have some retail and community services on the ground floor. The buildings would be a mix of the following:

- Townhouse/Rowhouse—Attached, multistory, single-family homes (15 to 30 units per acre);
- Stacked Flats—One-story apartments arranged one over the other (25 to 40 units per acre);
- Podium Building—A building with a parking garage below and residences or other uses above (40 to 50 units per acre);
- Corridor Building—An apartment building with units accessed from a central corridor (40 to 60 units per acre);
- Mixed Use—Retail or public use on ground floor with senior housing above (50 to 80 units per acre); and
- Up to 72,500 square feet of community-serving space in several locations, including a separate two-story community center, which would house recreational facilities for use by project residents and residents of the neighborhood, with youth and early childhood education programs.

The Project would be built in three major phases over a period of 9 to 15 years. During each phase, the existing buildings, streets, and utilities would be demolished first, and rough grading of the streets, building pads and open space would occur. The Project would require about 221,000 cubic yards of soil to be hauled off the site. Maximum excavation would be 45 feet (13.5 meters) below the current ground surface.

The proposed Project would also require realigning Sunnydale, Brookdale and Blythedale Avenues and Santos Street and adding new cross streets to create a street grid that would improve connectivity and access within the development and to Hahn Street. Brookdale Avenue would be realigned to connect with Sunnydale Avenue; new cross streets would connect Blythedale Avenue to Sunnydale Avenue at three different locations; Blythedale Avenue would be realigned at Hahn Street to connect with Sunrise Way; and a pair of new streets would link Blythedale Avenue and Hahn Street one block north of Sunrise Way.

The project site currently contains 430 off-street surface parking spaces (0.55 spaces per dwelling unit) and 452 on-street parking spaces. The proposed Project would provide approximately 1,437 off-street parking spaces (0.85 spaces per dwelling unit) in underground and at-grade parking garages in mixed-use and residential buildings, and 525 on-street parking spaces.

The site is within the RM-1 Residential, Mixed District, Low Density (one unit per 800 square feet of lot area is principally permitted), and 40-X height and bulk district (40-foot-high maximum height, no bulk limits). The site slopes down from west (Brookdale Avenue) to east (Hahn Street), at slopes ranging from 15.5 percent at its highest and steepest point to a 2-percent slope at the lower elevations. The average grade change is 9 percent. Elevations range from 250 feet at the western edge of the site to 75 feet at the southeastern corner. The topography allows for sweeping views to the south and to the east toward the San Francisco Bay.

The proposed Project site has been identified as an area that will be redeveloped under the San Francisco Housing for People Everywhere (HOPE) SF Program. The HOPE SF Program, a partnership between the Mayor's Office of Housing and Community Development ("MOHCD") and the San Francisco Housing Authority ("SFHA"), proposes to redevelop the Sunnydale and Velasco housing complexes as a part of its program to revitalize distressed public housing developments in San Francisco.

B. Project Objectives

The Project Sponsor has developed the following objectives for the proposed Project:

- Create a racially, socially, and economically integrated neighborhood with new high-quality public housing units, affordable rental apartments, and market-rate for-sale homes;
- Ensure no loss of public housing units;
- Develop a financially feasible project;
- Establish physical and social connections between the Sunnydale-Velasco housing developments, the larger Visitacion Valley neighborhood, and the larger city;
- Provide economic opportunities for residents;
- Provide community facilities, including space for on-site services and programs;
- Create a comprehensive services plan to address gaps in services and facilitate access to existing programs and resources;
- Build new safe streets and open spaces;
- Create an environmentally sustainable and accessible community with access to healthy food and gardens;
- Develop different building types at a density to make the project economically viable;
- Build community-serving retail stores; and

- Incorporate green and healthy development principles that include green construction and healthy buildings, a walkable neighborhood, stormwater management, and solar technology.

C. Project Approvals

The Project requires the following Planning Commission approvals and/or actions:

- Certification of the Final EIR/EIS, and adoption of CEQA Findings and Mitigation Monitoring and Reporting Program
- Recommendation to Board of Supervisors for rezoning that would create a Special Use District (SUD) to allow certain non-residential uses, such as community services, retail, and recreational and educational facilities that would otherwise not be permitted or require conditional use authorization; enable modifications from the strict quantitative requirements of the Planning Code to allow for more flexibility in the placement of rear yards, setbacks, location and number of parking and loading spaces, among other standards; and approve the ability to distribute density unevenly across the project site
- Recommendation to the Board of Supervisors for approval of height and bulk map amendments
- Approval of the Sunnydale HOPE SF Design Standards and Guidelines
- Approval of "Major Modifications" to the Potrero HOPE SF Design Standards and Guidelines on a project-by-project basis if requested for subsequent phases of development, an application and approval process established in the SUD
- Recommendation to the Board of Supervisors for approval of a Development Agreement
- Determination that any additional shadow cast on McLaren Park by new buildings exceeding 40 feet in height would not adversely impact the use of the park pursuant to Section 295 of the Planning Code
- General Plan Referral per Section 2A.53 of the Administrative Code

The Project requires the following Board of Supervisors approvals and/or actions:

- Approval of a SUD with recommendation from the Planning Commission
- Approval of height and bulk map amendments with recommendation from the Planning Commission
- Approval of a Development Agreement under Chapter 56 of the Administrative Code
- Affirm certification of EIR, if appealed

Actions by Other City Departments and State Agencies

- Approval of proposed new street grid (San Francisco Fire Department, San Francisco Department of Public Works, and the Sustainable Streets and San Francisco Municipal Railway Planning Divisions of the San Francisco Municipal Transportation Agency)
- Approval of any necessary construction permits for work within roadways (San Francisco Municipal Transportation Agency; San Francisco Department of Public Works)
- Demolition , grading and building permits (Department of Building Inspection)
- Approval of stormwater management system; approval of monitoring plan for construction activities near susceptible utilities; approval of Erosion and Sediment Control Plan; approval of Batch Wastewater Discharge Permit; approval for new water, sewer and street light utility connections (San Francisco Public Utilities Commission)
- Approval of permit for backup emergency generator (Bay Area Air Quality Management District)

D. Environmental Review

On November 16, 2012, HUD issued a notice of intent (NOI) to prepare a Draft Environmental Impact Statement to inform agencies and the general public that a joint EIR/EIS was being prepared and invited comments on the scope and content of the document. The NOI provided contact information for City staff responsible for the NOI, and stated that a public scoping meeting would be held no less than 15 days following publication of the NOI.

On December 13, 2012, MOHCD mailed a Change in Date of Close of Comment Period Notice to applicable agencies. This notice extended the comment period to January 18, 2013.

On December 19, 2012, the Planning Department, in compliance with CEQA and its CEQA procedures, issued a Notice of Preparation ("NOP") to prepare a Draft Environmental Impact Report. Individuals and agencies that received these notices included: all occupants of the Sunnydale and Velasco housing complexes; owners of properties within 300 feet of the Project site; owners and tenants of properties adjacent to the Project site; other potentially interested parties, including various regional and state agencies; and neighborhood organizations.

On January 5, 2013, a scoping meeting was held. The scoping meeting provided the public and affected governmental agencies with an opportunity to present their environmental concerns regarding the proposed Project.

On January 12, 2013, a further scoping meeting was held, presenting the public and affected agencies with a further opportunity to provide written and oral comments.

On December 19, 2014, the Department published the Draft Environmental Impact Report / Environmental Impact Statement (hereinafter "DEIR/DEIS"). The DEIR/DEIS was made available for a 60-day public review period, beginning on December 19, 2014, to solicit public comment from agencies and individuals on the adequacy and accuracy of the DEIR/DEIS.

A Notice of Availability ("NOA") of the DEIR/DEIS was posted on the websites of the Department and the MOHCD, as well as in the Federal Register, on December 19, 2014.

The NOA was distributed to applicable local and State agencies, interested parties, owners and occupants of properties within 300 feet of the Project site, individuals likely to be interested in the potential impacts of the Proposed Project, commenters on the NOP and NOI, and those individuals who requested a copy of the DEIR/DEIS.

Copies of the Draft EIR/EIS were also available for public review during normal business hours at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA; the Planning Information Center at 1660 Mission, First Floor, San Francisco, CA 94105; and the MOHCD offices at 1 South Van Ness Avenue 5th Floor, San Francisco, CA 94103.

Notice of Completion was filed with the State Secretary of Resources via the State Clearinghouse on December 19, 2014.

The Commission held duly advertised public hearings on the DEIR/DEIS on January 20, 2015 and January 22, 2015, at which opportunity for public comment was given, and public comment was received on the DEIR/DEIS. The period for commenting on the EIR/EIS ended on February 17, 2015.

The Department prepared responses to comments on environmental issues received during the 60-day public review period for the DEIR/DEIS, prepared revisions to the text of the DEIR/DEIS in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR/DEIS. This material was presented in a Responses to Comments document, published on June 24, 2015, distributed to the Commission and all parties who commented on the DEIR/DEIS, and made available to others upon request at the Department.

A Final Environmental Impact Report / Environmental Impact Statement (hereinafter "FEIR/FEIS") has been prepared by the Department, consisting of the DEIR/DEIS, any consultations and comments received during the review process, any additional information that became available, and the Responses to Comments document, all as required by law.

Project EIR/EIS files have been made available for review by the Commission and the public. These files are available for public review at the Department at 1650 Mission Street, Suite 400, and are part of the record before the Commission.

On ____, the Commission reviewed and considered the FEIR/FEIS and found that the contents of said report and the procedures through which the FEIR/FEIS was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code. The FEIR/FEIS was certified by the Commission on ____ by adoption of its Motion No. _____.

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E. Content and Location of Record

The record upon which all findings and determinations related to the adoption of the proposed project are based include the following:

- The FEIR/FEIS, and all documents referenced in or relied upon by the FEIR/FEIS;

- All information (including written evidence and testimony) provided by City staff to the Planning Commission relating to the FEIR/FEIS, the proposed approvals and entitlements, the Project, and the alternatives set forth in the FEIR/FEIS;
- All information (including written evidence and testimony) presented to the Planning Commission by the environmental consultant and subconsultants who prepared the FEIR/FEIS, or incorporated into reports presented to the Planning Commission;
- All information (including written evidence and testimony) presented to the City from other public agencies relating to the project or the FEIR/FEIS;
- All applications, letters, testimony, and presentations presented to the City by the Project Sponsor and its consultants in connection with the project;
- All information (including written evidence and testimony) presented at any public hearing or workshop related to the project and the EIR/EIS;
- The MMRP; and,
- All other documents comprising the record pursuant to Public Resources Code Section 21167.6(e).

The public hearing transcripts and audio files, a copy of all letters regarding the FEIR/FEIS received during the public review period, the administrative record, and background documentation for the FEIR/FEIS are located at the Planning Department, 1650 Mission Street, 4th Floor, San Francisco. The Planning Department, Jonas P. Ionin, is the custodian of these documents and materials.

F. Findings about Environmental Impacts and Mitigation Measures

The following Sections II, III and IV set forth the Commission's findings about the FEIR/FEIS's determinations regarding significant environmental impacts and the mitigation measures proposed to address them. These findings provide the written analysis and conclusions of the Commission regarding the environmental impacts of the Project and the mitigation measures included as part of the FEIR/FEIS and adopted by the Commission as part of the Project. To avoid duplication and redundancy, and because the Commission agrees with, and hereby adopts, the conclusions in the FEIR/FEIS, these findings will not repeat the analysis and conclusions in the FEIR/FEIS but instead incorporate them by reference and rely upon them as substantial evidence supporting these findings.

In making these findings, the Commission has considered the opinions of staff and experts, other agencies, and members of the public. The Commission finds that (i) the determination of significance thresholds is a judgment decision within the discretion of the City and County of San Francisco; (ii) the significance thresholds used in the FEIR/FEIS are supported by substantial evidence in the record, including the expert opinion of the FEIR/FEIS preparers and City staff; and (iii) the significance thresholds used in the FEIR/FEIS provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project. Thus, although, as a legal matter, the Commission is not bound by the significance determinations in the FEIR/FEIS (see Public Resources Code, Section 21082.2, subdivision (e)), the Commission finds them persuasive and hereby adopts them as its own.

These findings do not attempt to describe the full analysis of each environmental impact contained in the FEIR/FEIS. Instead, a full explanation of these environmental findings and conclusions can be found in the FEIR/FEIS, and these findings hereby incorporate by reference the discussion and analysis in the FEIR/FEIS supporting the determination regarding the project impact and mitigation measures designed to address those impacts. In making these findings, the Commission ratifies, adopts and incorporates in these findings the determinations and conclusions of the FEIR/FEIS relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

As set forth below, the Commission adopts and incorporates all of the mitigation measures set forth in the Project FEIR/FEIS, which are set forth in the attached MMRP, to reduce the significant and unavoidable impacts of the Project. The Commission intends to adopt the mitigation measures proposed in the FEIR/FEIS. Accordingly, in the event a mitigation measure recommended in the FEIR/FEIS has inadvertently been omitted in these findings or the MMRP, such mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in these findings or the MMRP fails to accurately reflect the mitigation measures in the FEIR/FEIS due to a clerical error, the language of the policies and implementation measures as set forth in the FEIR/FEIS shall control. The impact numbers and mitigation measure numbers used in these findings reflect the information contained in the FEIR/FEIS.

In Sections II, III and IV below, the same findings are made for a category of environmental impacts and mitigation measures. Rather than repeat the identical finding to address each and every significant effect and mitigation measure, the initial finding obviates the need for such repetition because in no instance is the Commission rejecting the conclusions of the FEIR/FEIS or the mitigation measures recommended in the FEIR/FEIS for the Project.

These findings are based upon substantial evidence in the entire record before the Planning Commission. The references set forth in these findings to certain pages or sections of the EIR/EIS or responses to comments in the Final EIR/EIS are for ease of reference and are not intended to provide an exhaustive list of the evidence relied upon for these findings.

II. LESS-THAN-SIGNIFICANT IMPACTS

The Final EIR/EIS found that implementation of the Project would result in less-than-significant impacts in the following environmental topic areas: Land Use and Land Use Planning; Visual Quality / Aesthetics; Socioeconomics / Population and Housing; Greenhouse Gas Emissions; Wind and Shadow; Recreation; Utilities and Service Systems; Public Services; Geology and Soils; Hydrology and Water Quality; Mineral and Energy Resources; Agricultural and Forest Resources.

Note: On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. Among other provisions, SB 743 added Section 21099 to the Public Resources Code ("PRC") and eliminated the analysis of aesthetics and parking impacts for certain urban infill projects under CEQA. The proposed Project meets the definition of a mixed-use residential project on an infill site within a transit priority area as specified by Section 21099. Accordingly, this document does not provide CEQA conclusions regarding aesthetics and parking, which can no longer be considered in determining the significance of the proposed Project's physical environmental effects under CEQA. Implementation of SB 743 was subsequent to the publication of the NOP, which had indicated that the EIR would include a

discussion of aesthetics- and parking-related impacts of the Proposed Project. However, since the proposed Project is subject to NEPA, comments submitted on the NOI relating to aesthetics and parking impacts are addressed in Section 4.4, *Visual Quality/Aesthetics*, of the FEIR/FEIS and NEPA conclusions are provided.

III. FINDINGS OF SIGNIFICANT IMPACTS THAT CAN BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL THROUGH MITIGATION AND THE DISPOSITION OF THE MITIGATION MEASURES

CEQA requires agencies to adopt mitigation measures that would avoid or substantially lessen a project's identified significant impacts or potential significant impacts if such measures are feasible. The findings in this section concern 13 potential impacts and their related mitigation measures proposed in the FEIR/FEIS. These mitigation measures are included in the MMRP. A copy of the MMRP is included as Attachment B to the Planning Commission Motion adopting these findings. The FEIR/FEIS found that six mitigation measures would be required for this Project to reduce to a less than significant level cultural and paleontological resources impacts; four mitigation measures would be required for this Project to reduce to a less than significant level transportation and circulation impacts; three mitigation measures would be required for this Project to reduce to a less than significant level noise impacts; one mitigation measure would be required for this Project to reduce to a less than significant level air quality impacts; two mitigation measures would be required for this Project to reduce to a less than significant level biological resources impacts; and two mitigation measures would be required for this Project to reduce to a less than significant level hazards and hazardous materials impacts.

The Project Sponsor has agreed to implement the following mitigation measures to address the potential cultural and paleontological resources, transportation and circulation, noise, air quality, biological resources, and hazards and hazardous materials impacts identified in the FEIR/FEIS. As authorized by CEQA Section 21081 and CEQA Guidelines Section 15091, 15092, and 15093, based on substantial evidence in the whole record of this proceeding, the Planning Commission finds that, unless otherwise stated, the Project will be required to incorporate mitigation measures identified in the FEIR/FEIS into the Project to mitigate or to avoid significant or potentially significant environmental impacts. Except as otherwise noted, these mitigation measures will reduce or avoid the potentially significant impacts described in the Final EIR/EIS, and the Commission finds that these mitigation measures are feasible to implement and are within the responsibility and jurisdiction of the City and County of San Francisco to implement or enforce.

Additionally, the required mitigation measures are fully enforceable and will be enforced through conditions of approval in any building permits issued for the Project by the San Francisco Department of Building Inspection. With the required mitigation measures, these Project impacts would be avoided or reduced to a less-than-significant level. The Planning Commission finds that the mitigation measures presented in the MMRP are feasible and shall be adopted as conditions of Project approval.

The following mitigation measures would be required to reduce cultural and paleontological resources impacts, transportation and circulation impacts, noise impacts, air quality impacts, biological resources impacts, geology and soils impacts, and hazards and hazardous materials impacts identified in the FEIR/FEIS to a less-than-significant level:

Project Mitigation Measure M-CP-2: Archeological Testing Program

Impact CP-2: Effects on Archaeological Resources. The proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064; therefore, implementation of an Archeological Testing Program, which requires the development of presence or absence investigation for archeological resources and evaluation of whether any archeological resource encountered in the C-APE constitutes an historical resource under CEQA, is required to avoid any potential adverse effect from the proposed Project on accidentally buried or submerged archaeological resources and to reduce this impact to a less than significant level.

Impact RE-2: Effects Due to Construction. The proposed Project includes construction of indoor and outdoor recreational facilities, the construction of which could have adverse physical effects on the environment; therefore, implementation of an Archeological Testing Program, which requires the development of presence or absence investigation for archeological resources and evaluation of whether any archeological resource encountered in the C-APE constitutes an historical resource under CEQA, is required to avoid any potential adverse effect from the proposed Project on accidentally buried or submerged archaeological resources and to reduce this impact to a less than significant level.

Impact UT-2: Effects Related to Construction of New Facilities. The proposed Project would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; therefore, implementation of an Archeological Testing Program, which requires the development of presence or absence investigation for archeological resources and evaluation of whether any archeological resource encountered in the C-APE constitutes an historical resource under CEQA, is required to avoid any potential adverse effect from the proposed Project on accidentally buried or submerged archaeological resources and to reduce this impact to a less than significant level.

Impact UT-3: Effects on Stormwater Conveyance and Treatment. The proposed Project would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; therefore, implementation of an Archeological Testing Program, which requires the development of presence or absence investigation for archeological resources and evaluation of whether any archeological resource encountered in the C-APE constitutes an historical resource under CEQA, is required to avoid any potential adverse effect from the proposed Project on accidentally buried or submerged archaeological resources and to reduce this impact to a less than significant level.

Project Mitigation Measure M-CP-3a: Paleontological Resources Mitigation Program

Impact CP-3: Effects on Paleontological Resources. The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; therefore, retention of a qualified paleontological consultant having expertise in California paleontology to carry out all mitigation measures related to paleontological resources is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-CP-3b: Paleontological Resources Training

Impact CP-3: Effects on Paleontological Resources. The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; therefore, training of all

construction forepersons and field supervisors conducting or overseeing subsurface excavations by a qualified paleontologist in the recognition of potential fossil materials prior to ground disturbing activities is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-CP-3c: Assessment and Salvage of Potential Fossil Finds

Impact CP-3: Effects on Paleontological Resources. The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; therefore, halting all earthwork or other types of ground disturbance in the immediate vicinity of any potential fossil discoveries during construction, among other evaluation and recovery activities, is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-CP-3d: Monitoring By A Qualified Paleontologist During Ground Disturbing Activities

Impact CP-3: Effects on Paleontological Resources. The proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; therefore, a qualified paleontologist's determination as to whether monitoring shall be required for ground disturbing activities when fossils are discovered during construction is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-CP-4: Inadvertent Discovery of Human Remains

Impact CP-4: Effects on Human Remains. The proposed Project could disturb human remains, including those interred outside of formal cemeteries; therefore, in the event of the discovery or anticipated discovery of human remains and associated burial-related cultural materials, immediate notification of the San Francisco Coroner, Native American Heritage Commission, and Most Likely Descendent, among other agreements for the appropriate treatment of the remains or funerary objects, is required to reduce this impact to a less than significant level.

Impact RE-2: Effects Due to Construction. The proposed Project includes construction of indoor and outdoor recreational facilities, the construction of which could have adverse physical effects on the environment; therefore, in the event of the discovery or anticipated discovery of human remains and associated burial-related cultural materials, immediate notification of the San Francisco Coroner, Native American Heritage Commission, and Most Likely Descendent, among other agreements for the appropriate treatment of the remains or funerary objects, is required to reduce this impact to a less than significant level.

Impact UT-2: Effects Related to Construction of New Facilities. The proposed Project would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; therefore, in the event of the discovery or anticipated discovery of human remains and associated burial-related cultural materials, immediate notification of the San Francisco Coroner, Native American Heritage Commission, and Most Likely Descendent, among other agreements for the appropriate treatment of the remains or funerary objects, is required to reduce this impact to a less than significant level.

Impact UT-3: Effects on Stormwater Conveyance and Treatment. The proposed Project would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the

construction of which could cause significant environmental effects; therefore, in the event of the discovery or anticipated discovery of human remains and associated burial-related cultural materials, immediate notification of the San Francisco Coroner, Native American Heritage Commission, and Most Likely Descendent, among other agreements for the appropriate treatment of the remains or funerary objects, is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-TR-6: Prepare Construction Traffic Control Plan

Impact TR-6: Construction Effects. The proposed Project would involve extensive construction over several years that could result in the following temporary conditions: street closures and detours, rerouting of Muni lines and bus stops, and sidewalk closures; therefore, implementation of a Construction Transportation Control Plan ("TCP") for each construction phase is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-NO-1a: Construction Specifications to Reduce Noise Levels During Construction

Impact NO-1: Exposure of Persons to or Generation of Noise Levels in Excess of Standards. The proposed Project could result in excess construction noise; therefore, the project sponsor is required to incorporate various practices into the construction specification documents, such as barriers/enclosures/mufflers under certain circumstances, low noise emission construction equipment, and implementation of noise attenuation measures to the extent feasible (among other things), to reduce this impact to a less than significant level.

Impact RE-2: Effects Due to Construction. The proposed Project includes construction of indoor and outdoor recreational facilities, the construction of which could have adverse physical effects on the environment; therefore, the project sponsor is required to incorporate various practices into the construction specification documents, such as barriers/enclosures/mufflers under certain circumstances, low noise emission construction equipment, and implementation of noise attenuation measures to the extent feasible (among other things), to reduce this impact to a less than significant level.

Impact UT-2: Effects Related to Construction of New Facilities. The proposed Project would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; therefore, the project sponsor is required to incorporate various practices into the construction specification documents, such as barriers/enclosures/mufflers under certain circumstances, low noise emission construction equipment, and implementation of noise attenuation measures to the extent feasible (among other things), to reduce this impact to a less than significant level.

Impact UT-3: Effects on Stormwater Conveyance and Treatment. The proposed Project would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; therefore, the project sponsor is required to incorporate various practices into the construction specification documents, such as barriers/enclosures/mufflers under certain circumstances, low noise emission construction equipment, and implementation of noise attenuation measures to the extent feasible (among other things), to reduce this impact to a less than significant level.

Project Mitigation Measure M-NO-1b: Noise Reduction Building Strategies

Impact NO-1: Exposure of Persons to or Generation of Noise Levels in Excess of Standards. The proposed Project could result in excess construction noise; therefore, the use of specified building materials to reduce interior noise for new residential development located along Sunnydale Avenue and Santos Street is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-NO-1c: Noise Minimization for Residential Open Space

Impact NO-1: Exposure of Persons to or Generation of Noise Levels in Excess of Standards. The proposed Project could result in excess construction noise; therefore, protection (to the maximum extent feasible) of open space required under the Planning Code for residential uses from existing ambient noise levels sufficient to maintain an exterior noise level of 70 dBA DNL for outdoor open spaces is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-AQ-1: Construction Emissions Minimization

Impact AQ-1: Criteria Pollutant Impacts During Construction. The proposed Project could generate fugitive dust and criteria air pollutants during construction, in violation of an air quality standard or contributing to an existing air quality violation or issue; therefore, submission of a Construction Emissions Minimization Plan for review and approval prior to the issuance of a construction permit; quarterly reporting; and certification of compliance are required to reduce this impact to a less than significant level.

Impact AQ-3: Toxic Air Contaminants. The proposed Project could generate toxic air contaminants, including diesel particulate matter, during construction, which would expose sensitive receptors to substantial pollutant concentrations; therefore, submission of a Construction Emissions Minimization Plan for review and approval prior to the issuance of a construction permit; quarterly reporting; and certification of compliance are required to reduce this impact to a less than significant level.

Project Mitigation Measure M-BI-1a: Protection of Special Status Bat Species

Impact BI-1 Effects on Special-Status Species. The proposed Project could have a substantial adverse effect on special-status species (identified at the federal, state or local level) or other legally protected species; therefore, implementation of protective measures, including pre-construction surveys, creation of no-disturbance buffers, and removal of trees or buildings with evidence of special-status bat activity during specific times, among other protections and subject to specified limitations, is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-BI-1b: Protection of Nesting Birds

Impact BI-1 Effects on Special-Status Species. The proposed Project could have a substantial adverse effect on special-status species (identified at the federal, state or local level) or other legally protected species; therefore, implementation of protective measures, including pre-construction surveys and creation of no-disturbance buffers, among other protections and subject to specified limitations, is required to reduce this impact to a less than significant level.

Project Mitigation Measure M-HZ-1: Hazardous Building Materials

Impact HZ-1: Effects Related to Hazardous Materials Emissions or Disposal. The proposed Project result in a human health or environmental hazard through the use or disposal of hazardous substances; therefore, the project sponsor is required to ensure that PCB-containing equipment, such as fluorescent light ballasts and other potentially hazardous building materials, are removed and properly disposed of prior to the start of demolition, in addition to proper abatement of any other hazardous materials identified either before or during demolition, to reduce this impact to a less than significant level.

Project Mitigation Measure M-HZ-2: Site Mitigation Plan and Radon Survey

Impact HZ-1: Effects Related to Hazardous Materials Emissions or Disposal. The proposed Project result in a human health or environmental hazard through the use or disposal of hazardous substances; therefore, creation and implementation of a Site Mitigation Plan and radon soil vapor survey is required to reduce this impact to a less than significant level.

Impact HZ-2: Effects Related to Release of Hazardous Material. The proposed Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; therefore, creation and implementation of a Site Mitigation Plan and radon soil vapor survey is required to reduce this impact to a less than significant level.

Impact RE-2: Effects Due to Construction. The proposed Project includes construction of indoor and outdoor recreational facilities, the construction of which could have adverse physical effects on the environment; therefore, creation and implementation of a Site Mitigation Plan and radon soil vapor survey is required to reduce this impact to a less than significant level.

Impact UT-2: Effects Related to Construction of New Facilities. The proposed Project would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; therefore, creation and implementation of a Site Mitigation Plan and radon soil vapor survey is required to reduce this impact to a less than significant level.

Impact UT-3: Effects on Stormwater Conveyance and Treatment. The proposed Project would require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; therefore, creation and implementation of a Site Mitigation Plan and radon soil vapor survey is required to reduce this impact to a less than significant level.

IV. SIGNIFICANT IMPACTS THAT CANNOT BE AVOIDED OR REDUCED TO A LESS-THAN-SIGNIFICANT LEVEL

Based on substantial evidence in the whole record of these proceedings, the Planning Commission finds that there is one significant project-specific and cumulative impact that would not be eliminated or reduced to an insignificant level by the mitigation measures listed in the MMRP. The FEIR/FEIS identifies this one significant and unavoidable impact on transportation and circulation.

The Planning Commission further finds based on the analysis contained within the FEIR/FEIS, other considerations in the record, and the significance criteria identified in the FEIR/FEIS, that feasible mitigation measures are not available to reduce the significant Project impact to less-than-significant levels, and thus this impact remains significant and unavoidable. The Commission also finds that, although measures were considered in the FEIR/FEIS that could reduce this significant impact, certain measures, as described in this Section IV below, are infeasible for reasons set forth below, and therefore this impact remains significant and unavoidable or potentially significant and unavoidable.

Thus, the following significant impact on the environment, as reflected in the FEIR/FEIS, is unavoidable. But, as more fully explained in Section VI, below, under Public Resources Code Section 21081(a)(3) and (b), and CEQA Guidelines 15091(a)(3), 15092(b)(2)(B), and 15093, the Planning Commission finds that this impact is acceptable for the legal, environmental, economic, social, technological and other benefits of the Project. This finding is supported by substantial evidence in the record of this proceeding.

The FEIR/FEIS identifies the following impact on transportation and circulation, for which no feasible mitigation measures were identified to reduce these impacts to less-than-significant levels:

Impact CC-TR-1 (Cumulative Effects on Level of Service): The proposed Project, in combination with past, present, and reasonably foreseeable future projects, could cause levels of service at local intersections to deteriorate and could conflict with applicable congestion management programs as well as plans, ordinances or policies establishing measures of effectiveness for the performance of the circulation system. Under the 2030 methodology, the proposed Project would have a significant impact at one intersection (#3 – Sunnydale Avenue / Schwerin Street) and its contribution would be cumulatively considered significant and unavoidable (for certain intersections) at five additional intersections (#4 – Sunnydale Avenue / Bayshore Boulevard; #6 – Geneva Avenue / Brookdale Avenue; #7 – Geneva Avenue / Santos Street; #9 – Geneva Avenue / Schwerin Street; #10 – Geneva Avenue / Bayshore Boulevard; and #11 – Visitacion Avenue / Bayshore Boulevard). However, improvement measures render the impacts at Intersection #6 less-than-significant. Under the 2040 methodology, the proposed Project would have a significant impact at one intersection (#1 – Sunnydale Avenue / Persia Street).

With respect to Intersection #3, under the 2030 methodology the proposed Project would cause the LOS on the worst approach to deteriorate from LOS C to LOS E, and the intersection would meet the Caltrans signal warrant under Cumulative Plus Project conditions. Implementation of Mitigation Measure M-CC-TR-1(a), which would include addition of a left-turn pocket on the westbound approach, would improve the LOS on the worst approach to LOS C and reduce cumulative traffic impacts to a less-than-significant level and therefore was considered. However, the feasibility of this measure was determined not to be known because the project sponsor does not have control over implementation of the measure. The San Francisco Municipal Transportation Agency (SFMTA) would have to further evaluate traffic circulation and volumes in the project area, and therefore the impact at this intersection would remain significant and unavoidable, due to the uncertainty of implementing this measure.

With respect to Intersection #4, under the 2030 methodology the proposed Project would cause the intersection operating condition to deteriorate from LOS E to F and would be therefore considered a significant traffic impact. Improvements such as providing additional traffic lanes were considered but are not feasible at this intersection because it would require substantial reduction in proposed sidewalk widths or bike lanes. There is not a parking lane available in the immediate area of the intersection that would provide space for an additional travel lane. In addition, signal timing adjustments were

considered but would be infeasible due to integrated signal timing for traffic and transit on Bayshore Boulevard, where changes in signal timing at one intersection could result in new impacts at another intersection. Therefore, no feasible mitigation measures were identified, and impacts would remain significant and unavoidable.

With respect to Intersection #7, under the 2030 methodology the proposed Project would add 87 vehicles to the critical southbound left-turn (SBL) movement during the p.m. peak hour, which would more than double the SBL volume, and therefore would be considered a considerable contribution to this critical movement. Implementation of Mitigation Measure M-CC-TR-1(b), which would require the SFMTA to add a left-turn pocket at the intersection of Geneva Avenue and Santos Street on the southbound approach, would improve intersection operations and therefore was considered. However, signal timing adjustments would be infeasible due to coordinated signal timing on Geneva Avenue, which could lead to new impacts at other intersections. Moreover, the project sponsor does not have control over implementation of the measure, and the SFMTA would have to further evaluate traffic circulation and volumes in the project area. Therefore, no feasible mitigation measures were identified , and the impact at this intersection would remain significant and unavoidable.

With respect to Intersection #9, under the 2030 methodology the proposed Project would add 232 vehicles to the critical westbound through (WBT) movement during the p.m. peak hour, approximately 7 percent of the WBT volume, and therefore would be considered a considerable contribution to this critical movement. Mitigation Measure M-CC-TR-1(c), which would require the SFMTA to add a right-turn pocket at intersection of Geneva Avenue and Schwerin Street on the westbound and southbound approaches, would improve intersection operations and reduce cumulative traffic impacts and was therefore considered. However, the overall intersection operations with this mitigation would remain at unacceptable levels mainly due to heavy increase in background traffic along Geneva Avenue. In addition, signal timing adjustments would be infeasible due to coordinated signal timing on Geneva Avenue, where changes in signal timing at one intersection could result in new impacts at another intersection. Moreover, the project sponsor does not have control over implementation of the measure, and the SFMTA would have to further evaluate traffic circulation and volumes in the project area. Therefore, no feasible mitigation measures were identified, and the impact would remain significant and unavoidable.

With respect to Intersection #10, under the 2030 methodology the proposed Project would add 150 vehicles to the critical westbound through movement, 83 vehicles to the critical southbound right-turn movement, and 47 vehicles to the critical eastbound left-turn movement during the p.m. peak hour. That would constitute 9 percent, 8 percent, and 5 percent of the volume in each movement, respectively, and therefore would be considered a considerable contribution to these critical movements. Improvements such as providing additional traffic lanes are neither feasible nor recommended because it would require expansion of the roadway and substantial reduction in sidewalk widths. Signal timing adjustments are infeasible due to coordinated signal timing on Bayshore Boulevard, where changes in signal timing at one intersection could result in new impacts at another intersection. No feasible mitigation measures were identified; therefore, the impacts would remain significant and unavoidable.

With respect to Intersection #11, under the 2030 methodology the proposed Project would cause the intersection operating conditions to deteriorate from LOS E to F and would therefore be considered a significant traffic impact. Improvements such as providing additional traffic lanes are not feasible because it would require substantial reduction in sidewalk widths. There is limited space for additional

traffic lanes due to the bus zone on Visitacion Avenue, and a parking lane already has been removed along Bayshore Boulevard to maximize vehicle turning movements at the intersection. Signal timing adjustments are infeasible due to coordinated signal timing on Bayshore Boulevard, where changes in signal timing at one intersection could result in new impacts at another intersection. No feasible mitigation measures were identified; therefore, the impacts would remain significant and unavoidable.

Finally, with respect to Intersection #1, under the 2040 methodology, the proposed Project would cause the LOS on the worst approach to deteriorate from LOS C to LOS E, and the intersection would meet the Caltrans signal warrant under Cumulative Plus Project conditions. This would be considered a significant traffic impact. Improvements would entail adding a left-turn lane at the northbound approach on Sunnydale Avenue, which would improve operating conditions to LOS C. However, since the intersection of Sunnydale Avenue and Persia Street is located within the John McLaren Park, adding a left-turn lane at the northbound approach would require approval by the San Francisco Recreation and Park Commission and the SFMTA Board of Directors. The McLaren Park - Mansell Corridor Improvements project, planned by the SFRPD, would remove the existing pork chop at this intersection and add a pedestrian bulb-out at the southwest corner. This improvement is intended to increase the amount of usable park space in McLaren Park and shorten the intersection crossing distance for pedestrians. With implementation of the McLaren Park – Mansell Corridor Improvements project, the width of Sunnydale Avenue at the subject intersection would be too narrow to accommodate a standard left turn pocket in the northbound direction. As such, adding a left-turn lane at the northbound approach would not be feasible, and the impact would be significant and unavoidable.

V. EVALUATION OF PROJECT ALTERNATIVES

A. Alternatives Analyzed in the FEIR/FEIS

This section describes the alternatives analyzed in the Project FEIR/FEIS and the reasons for rejecting the alternatives as infeasible. CEQA mandates that an EIR evaluate a reasonable range of alternatives to the Project or the Project location that generally reduce or avoid potentially significant impacts of the Project. CEQA requires that every EIR also evaluate a "No Project" alternative. Alternatives provide a basis of comparison to the Project in terms of their significant impacts and their ability to meet project objectives. This comparative analysis is used to consider reasonable, potentially feasible options for minimizing environmental consequences of the Project.

The Planning Department considered a range of alternatives in Chapter 2 of the FEIR/FEIS. The FEIR/FEIS analyzed Alternative A: Reduced Development/Density Alternative; Alternative B: One-for-One Replacement Alternative; and Alternative C: No Project Alternative. Each alternative is discussed and analyzed in these findings, in addition to being analyzed in Chapter 2 of the FEIR/FEIS. The Planning Commission certifies that it has independently reviewed and considered the information on the alternatives provided in the FEIR/FEIS and in the record. The FEIR/FEIS reflects the Planning Commission's and the City's independent judgment as to the alternatives. The Planning Commission finds that the Project provides the best balance between satisfaction of Project objectives and mitigation of environmental impacts to the extent feasible, as described and analyzed in the FEIR/FEIS.

B. Reasons for Approving the Project

- To increase by approximately 925 units the number of overall dwelling units from what is currently located at the Project site in an area with a critical need for additional housing.
- To provide modern, upgraded public housing units to current residents and households of the Sunnydale and Velasco housing complexes.
- To increase the City's supply of affordable dwelling units by inclusion of up to 231 affordable housing units, for a total of up to 60 percent affordable housing over the entire Project.
- To rebuild and reconstruct the street ways, transit and utility infrastructure into a workable, transit-friendly design.
- To provide ground floor, neighborhood-serving retail space and inject much needed commercial opportunities.
- To provide up to 72,500 square feet of community service, recreational and educational facilities.
- To increase the number of community-centered open spaces by developing new parks and private open spaces, including a community garden, a farmer's market pavilion and secure outdoor courtyards within residential buildings.
- To construct streetscape improvements that encourage and enliven pedestrian activity.
- To construct a high-quality project with superior design and a sufficient number of dwelling units to produce a reasonable return on investment for the Project Sponsor and investors and attract investment capital and construction financing.
- To improve the architectural and urban design character of the Project site by replacing run-down structures with a high-quality residential project incorporating a superior design.
- To provide adequate parking and vehicular access to serve the needs of Project residents and their visitors.
- To ensure no loss of public housing units.

C. Evaluation of Project Alternatives

CEQA provides that alternatives analyzed in an EIR may be rejected if "specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible . . . the project alternatives identified in the EIR." (CEQA Guidelines § 15091(a)(3).) The Commission has reviewed each of the alternatives to the Project as described in the FEIR/FEIS that would reduce or avoid the impacts of the Project and finds that there is substantial evidence of specific economic, legal, social, technological and other considerations that make these Alternatives infeasible, for the reasons set forth below.

In making these determinations, the Planning Commission is aware that CEQA defines "feasibility" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." The Commission is also aware that under CEQA case law the concept of "feasibility" encompasses (i) the question of whether a particular alternative promotes the underlying goals and objectives of a project, and (ii) the question of whether an alternative is "desirable" from a policy standpoint to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors.

Alternative A: Reduced Development/Density Alternative

The Reduced Development/Density Alternative would retain a site plan similar to that of the proposed Project, but smaller in scale. This alternative would include up to 1,372 dwelling units in 34 new development blocks covering approximately 1,383,000 square feet of residential space. 852 of the dwelling units would be affordable, including the public housing replacement units. Additionally, there would be 77 affordable rental units and 520 market-rate for-sale units. Additionally, this alternative would include up to 16,000 square feet of neighborhood-serving retail, and up to 72,500 square feet of recreation, pavilion and community services, including a community center. This alternative would provide for 1,123 off-street parking spaces in underground and at-grade parking garages, and 481 on-street parking spaces and 654 bike parking spaces. The phasing and construction of the Reduced Development/Density Alternative would proceed on a similar schedule as the proposed Project.

The Planning Commission rejects the Reduced Development/Density Alternative as infeasible because it would fail to meet the Project Objectives and the City's policy objectives for the following reasons:

1) The Reduced Development/Density Alternative would limit the project to 1,372 dwelling units; whereas the proposed Project would provide 1,700 total units to the City's housing stock and maximize the creation of new residential units. The City's important policy objective is to increase the housing stock whenever possible to address a shortage of housing in the City.

2) The Reduced Development/Density Alternative would create a project that would not fully utilize this site for housing production, thereby not fully satisfying General Plan policies such as Housing Element Policies 1.1 and 1.4, among others. The alternative would not create a project that is consistent with and enhances the existing scale and urban design character of the area or furthers the City's housing policies to create more housing, particularly affordable housing opportunities.

3) The Reduced Development/Density Alternative would eliminate none of the significant and unavoidable impacts that the proposed Project faces, thereby not enhancing mitigation of environmental impacts for purposes of CEQA analysis.

4) The Reduced Development/Density Alternative is also economically infeasible. Large development projects are capital-intensive and depend on obtaining financing from equity investors to cover a significant portion of the project's costs, obtain a construction loan for the bulk of construction costs, and provide significant costs out-of-pocket. Equity investors require a certain profit margin to finance development projects and must achieve established targets for their internal rate of return and return multiple on the investment. Because the Reduced Development/Density Alternative would result in a project that is significantly smaller than the

Project, and contains 328 fewer residential units, the total potential for generating revenue is lower while the construction cost per square foot is higher due to lower economies of scale and the impact of fixed project costs associated with development. The reduced unit count would not generate a sufficient economic return to obtain financing and allow development of the proposed project and therefore would not be built.

5) The Reduced Development/Density Alternative would create a project with fewer housing units in an area well-served by transit, services and shopping and adjacent to employment opportunities which would then push demand for residential development to other sites in the City or the Bay Area. This would result in the Reduced Development/Density Alternative not meeting, to the same degree as the Project, the City's *Strategies to Address Greenhouse Gas Emissions* or CEQA and the Bay Area Air Quality Management District's ("BAAQMD") requirements for a GHG reductions, by not maximizing housing development in an area with abundant local and region-serving transit options.

For the foregoing reasons, the Planning Commission rejects the Reduced Development/Density Alternative as infeasible.

Alternative B: One-for-One Replacement Alternative

The FEIR/FEIS identified the One-for-One Replacement Alternative as the environmentally superior alternative.

The One-for-One Replacement Alternative would demolish all existing housing units at the Project site. The housing units would then be rebuilt using generally the same building pattern and street grid that currently exists, with updates as needed to comply with current Planning Code and Building Code requirements. As such, this alternative would reconstruct 775 affordable senior and family units, with replacements for the currently existing community facility and police substation. The project site's existing 430 off-street surface parking spaces and 452 on-street parking spaces would be replaced in approximately their current configurations. This alternative would provide bicycle parking spaces, the number of which would be determined through the Special Use District legislation. The existing public open space at the project site—including existing recreational facilities—would be replaced. The community center and child care uses would be located in the same locations as under existing conditions. Other amenities provided under the proposed Project, such as additional parks, retail facilities, and the Community Center, would not be provided as part of this alternative.

The Planning Commission rejects the One-for-One Replacement Alternative as infeasible because it would fail to meet the Project Objectives and City policy objections for the following reasons:

1) The One-for-One Replacement Alternative would limit the project to replacement of the 775 existing public housing units; whereas the proposed project would replace those public housing units while providing an additional 925 residential units to the City's housing stock and maximize the creation of new residential units, including new affordable units. The City's important policy objective is to increase the housing stock, particularly affordable housing, whenever possible to address a shortage of housing in the City.

2) The One-for-One Replacement Alternative would not meet many of the Project Sponsor's objectives, including increased employment opportunities, establishing physical and social connections with the larger Visitacion Valley neighborhood, building new safe streets and open spaces, and providing space for community-serving retail stores.

3) The One-for-One Replacement Alternative would not maximize the opportunity to reconfigure roadways and overall Project footprint to maximize the space available, or the opportunity to upgrade and resize water, wastewater, drainage, gas and electric, and other utility infrastructure within the existing Project site.

4) The One-for-One Replacement Alternative would create a project that would not fully utilize this site for housing production, thereby not fully satisfying General Plan policies such as Housing Element Policies 1.1 and 1.4, among others. While the One-for-One Replacement Alternative would ameliorate most (but not all) of the significant unavoidable impacts of the proposed project, the alternative would not create a project that is consistent with and enhances the existing scale and urban design character of the area or furthers the City's housing policies to create more housing, particularly affordable housing opportunities.

5) The One-for-One Replacement Alternative would create a project with fewer housing units in an area well-served by transit, services and shopping and adjacent to employment opportunities which would then push demand for residential development to other sites in the City or the Bay Area. This would result in the One-for-One Replacement Alternative not meeting, to the same degree as the Project, the City's *Strategies to Address Greenhouse Gas Emissions* or CEQA and the Bay Area Air Quality Management District's ("BAAQMD") requirements for a GHG reductions, by not maximizing housing development in an area with abundant local and region-serving transit options.

For the foregoing reasons, the Planning Commission rejects the One-for-One Replacement Alternative as infeasible.

Alternative C: No Action / No Project Alternative

Under the No Action / No Project Alternative, the Project Site would remain in its existing condition. Existing buildings and tenants would remain at the Project site and no new buildings or uses would be constructed. Baseline conditions described in detail for each environmental topic in Chapter 3, Affected Environment, would remain and none of the impacts associated with the Project would occur.

The existing 94 residential buildings in the Sunnydale and Velasco housing complexes, along with the existing community center and other ancillary buildings, would remain and continue operating as-is. Building heights on the site would not be changed. No open space would be developed within the site and no changes to streets or infrastructure would occur.

The Planning Commission rejects the No Action / No Project Alternative as infeasible because it would fail to meet the Project Objectives and the City's policy objectives for the following reasons:

1) The No Action / No Project Alternative would not meet any of the Project Sponsor's objectives;

2) The No Action / No Project Alternative would be inconsistent with key goals of the City's General Plan with respect to housing production. With no new housing created here and no construction, the No Action / No Project Alternative would not increase the City's housing stock of both market rate and affordable housing, would not create new job opportunities for construction workers, and would not expand the City's property tax base.

3) The No Action / No Project Alternative would leave the Project Site physically unchanged, and thus would not achieve any of the objectives regarding the redevelopment of a large underutilized site (primarily consisting of older buildings in need of significant repair and/or replacement), creation of a mixed-use project, contribution to regional housing needs, provision of affordable dwelling units, provision of publicly-accessible open space, and provision of new neighborhood services.

For the foregoing reasons, the Planning Commission rejects the No Action / No Project Alternative as infeasible.

VI. STATEMENT OF OVERRIDING CONSIDERATIONS

The Planning Commission finds that, notwithstanding the imposition of all feasible mitigation measures and alternatives, significant impacts related to Transportation and Circulation will remain significant and unavoidable. Pursuant to CEQA section 21081 and CEQA Guideline Section 15093, the Planning Commission hereby finds, after consideration of the Final EIR/EIS and the evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the Project as set forth below independently and collectively outweighs these significant and unavoidable impacts and is an overriding consideration warranting approval of the Project. Any one of the reasons for approval cited below is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the Commission will stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this Section, and in the documents found in the record, as defined in Section I.

On the basis of the above findings and the substantial evidence in the whole record of this proceeding, the Planning Commission specifically finds that there are significant benefits of the Project to support approval of the Project in spite of the unavoidable significant impacts, and therefore makes this Statement of Overriding Considerations. The Commission further finds that, as part of the process of obtaining Project approval, significant effects on the environment from implementation of the Project have been eliminated or substantially lessened where feasible. All mitigation measures proposed in the FEIR/FEIS and MMRP are adopted as part of the Approval Actions described in Section I, above.

Furthermore, the Commission has determined that any remaining significant effects on the environment found to be unavoidable are acceptable due to the following specific overriding economic, technological, legal, social and other considerations.

The Project will have the following benefits:

1. The Project would increase the number of units at the site from 775 to approximately 1,700, adding up to 925 new dwelling units to the City's housing stock.

2. In addition to the 925 new dwelling units, the Project would replace 775 public housing units, currently in various stages of decay, with new, modern, upgraded units for existing residents.

3. The Project would increase the stock of permanently affordable housing by creating up to approximately 231 units affordable to low-income households on-site (not including the 775 public housing units).

4. The Project site is currently underused and in various stages of decay, and the construction of up to 1,080 new housing units and a total of 1,700 units at this underutilized site will directly help to alleviate the City's housing shortage and lead to more affordable housing

5. The Project will increase the availability of open space, parks and community-serving retail uses in the area, fostering a sense of community.

6. In realigning current streets and constructing new streets, the Project will eliminate the physical isolation experienced by the current community and ensure that the new development is connected to the surrounding residential fabric and utility infrastructure.

7. The Project implements and fulfills the goals of the City's HOPE SF Initiative Program. The HOPE SF program has identified the need for redevelopment of the Sunnydale-Velasco housing development and has included it as a part of its program to revitalize distressed public housing developments in San Francisco. The Project site is comprised of two of the older public housing developments in San Francisco, Sunnydale housing complex and Velasco housing complex, and contains 775 units that are in various stages of physical decay. Together, these public housing developments house a population of hundreds of people, as well as a community center building. In addition to distressed and deteriorated housing, the development contains a poor street grid that isolates residents from the surrounding Visitacion Valley neighborhood. The Project would replace the deteriorated existing housing units and provide new infrastructure and other site improvements.

8. The Project promotes a number of General Plan Objectives and Policies, including Housing Element Policy 1.1, which provides that "Future housing policy and planning efforts must take into account the diverse needs for housing;" and Policies 11.1, 11.3 and 11.6, which "Support and respect the diverse and distinct character of San Francisco's Neighborhoods." San Francisco's housing policies and programs should provide strategies that promote housing at each income level, and furthermore identify sub-groups, such as middle income and extremely low income households that require specific housing policy. In addition to planning for affordability, the City should plan for housing that serves a variety of household types and sizes." The Project will provide a mix of housing types at this location, including approximately 150 affordable senior units, up to 858 affordable family units, and approximately 694 market-rate units, ranging from one to four bedrooms, increasing the diversity of housing types in this area of the City.

9. The Project meets the City's *Strategies to Address Greenhouse Gas Emissions* and the BAAQMD requirements for a GHG reductions by maximizing development on an infill site that is well-served by transit, services and shopping and is suited for dense residential development, where residents can commute and satisfy convenience needs without frequent use of a private

automobile and is adjacent to employment opportunities, in an area with abundant local and region-serving transit options. The Project would leverage the site's location and proximity to transit by building a dense mixed use project that allows people to live and work close to transit sources.

10. The Project's design furthers Housing Element Policy 11.1, which provides that "The City should continue to improve design review to ensure that the review process results in good design that complements existing character."

11. The Project would construct a development that is in keeping with the scale, massing and density of other structures in the immediate vicinity.

12. The Conditions of Approval for the Project will include all the mitigation and improvement measures that would mitigate the Project's potentially significant impact to insignificant levels, except for certain impacts on Transportation and Circulation.

13. The Project will create temporary construction jobs and permanent jobs in the retail and community services sectors. These jobs will provide employment opportunities for San Francisco residents, promote the City's role as a commercial center, and provide additional payroll tax revenue to the City, providing direct and indirect economic benefits to the City .

14. The Project will substantially increase the assessed value of the Project Site, resulting in corresponding increases in tax revenue to the City.

15. The Project will contribute to ending the cycle of inter-generational poverty by implementing a robust social services program.

Having considered the above, the Planning Commission finds that the benefits of the Project outweigh the unavoidable adverse environmental effects identified in the FEIR/FEIS, and that those adverse environmental effects are therefore acceptable.

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor				
Cultural and Paleontological Resources				
Mitigation Measure M-CP-2: Archeological Testing Program				
An Archeological Testing Program shall be developed to ascertain whether archeological material may be preserved underneath recent fill within the project CEQA Area of Potential Effect (C-APE). This effort shall entail geoarcheological coring of the eastern-most portion of the project C-APE—in project blocks 1 through 8 east of Santos Street—and shall take place after detailed project design plans have been developed that show the full extent and depth of project construction activity. Additional pre-field investigations into the cut and fill history of the project C-APE should also be undertaken. With these additional data sets, the precise placement and depth of cores can be determined in order to ensure testing coverage is sufficient to identify any unknown archeological material that would be impacted by construction activities. Based on a reasonable presumption that archeological resources may be present within the project area, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried archeological resources. The project sponsor shall retain the services of an archaeological consultant qualified in geoarcheology from the rotational Department Qualified Archaeological Consultants List (QACL) maintained by the Planning Department archaeologist. The project sponsor shall contact the Department archeologist to obtain the names and contact information for the next three archeological consultants on the QACL. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Section 15064.5 (a)(c).	Project sponsor/ archeological consultant at the direction of the ERO.	Prior to any soil-disturbing activities on the project site. Monitoring as required until soil-disturbing activities end.	Project sponsor to retain a qualified archeological consultant who shall report to the ERO.	Archeological consultant shall be retained prior to any soil-disturbing activities. Date archeological consultant retained: _____ Date of initial soil disturbing activities: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Cultural and Paleontological Resources (cont.)				
Mitigation Measure M-CP-2: Archeological Testing Program (cont.)				
Consultation with Descendant Communities. On discovery of an archeological site[1] an appropriate representative[2] of the descendant group and the ERO shall be contacted. The representative of the descendant group shall be given the opportunity to monitor archeological field investigations of the site and to consult with the ERO regarding appropriate archeological treatment of the site, of recovered data from the site, and, if applicable, any interpretative treatment of the associated archeological site. A copy of the Final Archeological Resources Report shall be provided to the representative of the descendant group.	Project sponsor/ archeological consultant, and representative of descendent group, at the direction of the ERO.	Initiated upon discovered of an archeological site associated with descendant groups. Complete upon completion of archeological field investigations and ERO consultation.	Project sponsor to retain a qualified archeological consultant who shall report to the ERO.	Date archeological site discovered: _____ Date field investigations monitored: _____ Date ERO consulted: _____ Date final report sent to descendant group representative: _____
Archeological Testing Plan. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program shall be to determine to the extent possible the presence or absence of archeological resources and to identify and evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.	Project sponsor/ archeological consultant at the direction of the ERO.	Prior to any soil-disturbing activities on the project site.	Archeologist shall prepare and submit draft ATP to the ERO. ATP to be submitted and reviewed by ERO prior to any soil-disturbing activities on the project site.	Date ATP submitted to the ERO: _____ Date ATP approved by the ERO: _____ Date of initial soil disturbing activities: _____

1 The term "archeological site" is intended here to minimally include any archeological deposit, feature, burial, or evidence of burial.

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

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Cultural and Paleontological Resources (cont.)				
Mitigation Measure M-CP-2: Archeological Testing Program (cont.)				
At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either: A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.	Project sponsor/ archeological consultant at the direction of the ERO.	After completion of the archeological testing program, and before soil disturbing activities begin.	Archeological consultant shall submit a report of findings of the ATP to the ERO.	Date archeological findings report submitted to the ERO: _____ ERO determination of significant archeological resource present? Y N Would resource be adversely affected? Y N Additional measures to be undertaken by project sponsor? Y N
Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions: • The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the archeological monitoring program (AMP) reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils- disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archeological resources and to their depositional context;	Project sponsor/ archeological consultant/ monitor/ contractor(s), at the direction of the ERO.	ERO and archeological consultant shall meet prior to commencement of soil-disturbing activities. If the ERO determines that an AMP is necessary, monitor throughout all soil-disturbing activities at the project site.	Project sponsor/ archeological consultant/monitor/ contractor(s) shall implement the AMP, if required by the ERO.	AMP required? Y N Date: _____ Date AMP submitted to the ERO: _____ Date AMP approved by the ERO: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Cultural and Paleontological Resources (cont.)				
Mitigation Measure M-CP-2: Archeological Testing Program (cont.)				
• The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource; • The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits; • The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis; • If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/ construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO. Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.				Date AMP implementation complete: _____ Date written report regarding findings of the AMP received: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Cultural and Paleontological Resources (cont.)				
Mitigation Measure M-CP-2: Archeological Testing Program (cont.)				
Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP shall identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical. The scope of the ADRP shall include the following elements: • *Field Methods and Procedures*. Descriptions of proposed field strategies, procedures, and operations. • *Cataloguing and Laboratory Analysis*. Description of selected cataloguing system and artifact analysis procedures. • *Discard and Deaccession Policy*. Description of and rationale for field and post-field discard and deaccession policies. • *Interpretive Program*. Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program. • *Security Measures*. Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities. • *Final Report*. Description of proposed report format and distribution of results. • *Curation*. Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.	Archeological consultant at the direction of the ERO.	If there is a determination that an ADRP program is required, prior to additional soil-disturbing construction activities.	Project sponsor/ archeological consultant/monitor/ contractor(s) shall prepare an ADRP if required by the ERO.	ADRP required? Y N Date: _____ Date of scoping meeting for ADRP: _____ Date Draft ARDP submitted to the ERO: _____ Date ARDP approved by the ERO: _____ Date ARDP implementation complete: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Cultural and Paleontological Resources (cont.)				
Mitigation Measure M-CP-2: Archeological Testing Program (cont.)				
Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Environmental Planning division of the Planning Department shall receive one bound, one unbound and one unlocked, searchable PDF copy on CD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.	Archeological consultant at the direction of the ERO.	After completion of archeological data recovery, inventory, and analysis.	Project sponsor/ archeological consultant/monitor/ contractor(s) shall prepare an FARR to the ERO.	Date Draft FARR submitted to ERO: _____ Date FARR approved by ERO: _____ Date of distribution of Final FARR: _____ Date of submittal of Final FARR to information center: _____
Mitigation Measure M-CP-3a: Paleontological Resources Mitigation Program				
Prior to ground disturbance, the project sponsor shall retain a qualified paleontologist (is a practicing scientist who is recognized in the paleontologic community and is proficient in vertebrate paleontology) or a California Professional Geologist with appropriate paleontological expertise to carry out all mitigation measures related to paleontological resources. The qualified paleontologist or geologist shall be available "on-call" to project sponsor throughout the duration of ground-disturbing activities.	Paleontologist (or geologist) at the direction of the project sponsor and ERO.	Prior to ground-disturbing activities / during ground-disturbing activities.	Project sponsor/ paleontologist under direction of the ERO.	Date paleontologist retained: _____ Date of start of ground-disturbing activities: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Cultural and Paleontological Resources (cont.)				
Mitigation Measure M-CP-3b: Paleontological resources training				
All construction forepersons and field supervisors conducting or overseeing subsurface excavations shall be trained by a qualified paleontologist in the recognition of potential fossil materials prior to ground disturbing activities. A one hour pre-construction training on paleontological resources shall also be provided to all other construction workers, but may include videotape of the initial training and/or the use of written materials rather than in person training by the qualified paleontologist. In addition to fossil recognition, the training shall convey procedures to follow in the event of a potential fossil discovery.	Paleontologist (or geologist) at the direction of the project sponsor and ERO.	Prior to ground-disturbing activities / during ground-disturbing activities.	Project sponsor/ paleontologist under direction of the ERO.	Date of training: _____ Date of start of ground-disturbing activities: _____
Mitigation Measure M-CP-3c: Assessment and salvage of potential fossil finds				
If potential fossils are discovered during construction, all earthwork or other types of ground disturbance in the immediate vicinity of the find shall stop until the qualified paleontologist can assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the fossil. If salvage is required, recommendations shall be consistent with current professional standards outlined in the Society of Vertebrate Paleontology, Assessment and Mitigation of Adverse Impacts to Nonrenewable Paleontologic Resources: Standard Guidelines. If required, treatment for fossil remains may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection.	Paleontologist (or geologist) at the direction of the project sponsor and ERO.	If potential fossils are discovered during construction.	Project sponsor/ paleontologist under direction of the ERO.	Fossils discovered? Y N Date find assessed: _____ Date of salvage/recovery (if recommended): _____
Mitigation Measure M-CP-3d: Monitoring by a qualified paleontologist during ground disturbing activities				
If fossils are discovered during construction, a qualified paleontologist shall determine whether monitoring shall be required during remaining ground disturbing activities. If required, a qualified paleontologist, a California Professional Geologist with appropriate paleontological expertise, or paleontological monitor working under the supervision of a qualified paleontologist shall monitor ground-disturbing activities. This monitoring shall consist of periodically inspecting disturbed, graded, and excavated surfaces, as well as soil stockpiles and disposal sites. The frequency of monitoring would be determined by the qualified paleontologist. If the monitor encounters a paleontological resource, he or she shall assess the fossil, and record or salvage it as described in M-CP-3c.	Paleontologist (or geologist) at the direction of the project sponsor and ERO.	If potential fossils are discovered during construction / during ground-disturbing activities. Continues as required until ground-disturbing activities end.	Project sponsor/ paleontologist under direction of the ERO.	Fossils discovered? Y N Dates monitoring recommended: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Cultural and Paleontological Resources (cont.)				
Mitigation Measure M-CP-4: Inadvertent Discovery of Human Remains				
The following measures shall be implemented in the event of the discovery, or anticipated discovery, of human remains and associated burial-related cultural materials: The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activities shall comply with applicable state laws. This shall include immediate notification of the coroner of the county within which the project is located and, in the event of the coroner's determination that the human remains are Native American, notification of the California Native American Heritage Commission, which shall appoint a Most Likely Descendant (MLD) (PRC Section 5097.98). The archeological consultant, the project sponsor, ERO and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5[d]). The agreement shall take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The PRC allows 48 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the project sponsor shall follow Section 5097.98(b) of the PRC, which states that "the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."	Project sponsor/ archeological consultant in consultation with the San Francisco Coroner, NAHC, and MLD.	In the event human remains and/or funerary objects are found.	Project sponsor/ archeological consultant to monitor (through-out all soil disturbing activities) for human remains and associated/ unassociated funerary objects and, if found, contact the San Francisco Coroner, NAHC/MLD.	Human remains and associated/unassociated funerary objects found? Y N Date: _____ Persons contacted: Name: _____ Date: _____ Name: _____ Date: _____
Transportation and Circulation				
Mitigation Measure M-TR-6: Prepare Construction Traffic Control Plan				
The project sponsor shall implement the following measure: To reduce potential delays and conflicts between construction activities and various modes of transportation, the project sponsor and its construction contractor(s) shall prepare a traffic control plan(s) for project construction. The project sponsor and construction contractor(s) shall meet with residents, neighbors, DPW, SFMTA, the Fire Department, SFUSD, Muni Operations, and other City agencies to coordinate feasible measures to reduce transportation conflicts and delays, including temporary transit	Project sponsor / contractor(s)	Prior to each phase of project construction, and implementation during construction.	ERO of the Planning Department, in consultation with SFMTA as necessary	Date Draft plan submitted to ERO: _____ Date plan approved by ERO: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Transportation and Circulation (cont.)				
Mitigation Measure M-TR-6: Prepare Construction Traffic Control Plan (cont.)				
stop relocations, transit service re-routing, adequate emergency access route(s), and other measures to reduce traffic and transit disruption, pedestrian and bicycle circulation effects, and interference with emergency access during construction of the proposed project. The contractor would be required to comply with the City and County of San Francisco's Regulations for Working in San Francisco Streets, which establish rules and permit requirements so that construction activities can be done safely while minimizing interference with pedestrians, bicyclists, transit, and vehicular traffic. The coordinated plan shall include measures that address street closures, and ensure safe access to the McLaren Early Education School and all occupied residences. It shall also include, but may not be limited to, the following elements: • Advisory signs shall be erected several weeks in advance to inform the public of planned street closures in the area. During each construction phase, street closure signs and detour routes shall be posted to direct vehicles to use alternative routes to access the project site. • Emergency vehicle access shall be maintained to the school and all other occupied units and buildings at all times using the temporary streets, detour routes, and/or flagpersons. • Construction staging and worker parking shall occur within the 48-acre Sunnydale-Velasco project site. • The construction contractor shall coordinate with school administrators to ensure safe access to and from the school for students, teachers, and parents at all times. The contractors ~~should~~ shall inquire as to the school start and dismissal times and schedule construction vehicle trips outside of the peak school drop-off and pick up hours to the extent feasible. If avoiding these hours is infeasible, the construction contractor shall provide additional flaggers and crossing guards during school drop-off and pick-up hours near school. • Establish truck traffic routes away from schools, daycares, and residences, or at a location with the least impact if those areas are unavoidable.				Meeting date(s) with agencies: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Transportation and Circulation (cont.)				
Mitigation Measure M-TR-6: Prepare Construction Traffic Control Plan (cont.)				
• To the extent applicable, the traffic control plan shall conform to Caltrans's Manual of Traffic Controls for Construction and Maintenance Work Zones.				
Mitigation Measure M-CC-TR-1(a)				
Upon completion of the proposed project, the SFMTA shall regularly monitor vehicular congestion. If LOS at Sunnydale Avenue and Schwerin Street degrades substantially to LOS E, and if consistent with the City's goals for a multi-modal transportation network, then the project sponsor shall work with the SFMTA to add a left-turn pocket at the intersection of Sunnydale Avenue and Schwerin Street on the westbound approach. The project sponsor, or is successor(s), shall make a fair share contribution of funding for the improvement.	Project sponsor	If SFMTA finds that LOS at Sunnydale Avenue and Schwerin Street degrades to LOS E, and if consistent with the City's goals for a multi-modal transportation network	SFMTA, in consultation with ERO as necessary	LOS determined substantially degraded: Date: _____ Fair share contribution made: Date: _____
Mitigation Measure M-CC-TR-1(b)				
Upon completion of the proposed project, the SFMTA shall regularly monitor vehicular congestion. If the project adds more than 5 percent of the southbound left-turn volume at Geneva Avenue and Santos Street, and if consistent with the City's goals for a multi-modal transportation network, then the project sponsor shall work with the SFMTA to add a left-turn pocket at the intersection of Geneva Avenue and Santos Street on the southbound approach. The project sponsor, or is successor(s), shall make a fair share contribution of funding for the improvement.	Project sponsor	If SFMTA finds that project adds more than 5 percent of southbound left-turn volume at Geneva Avenue and Santos Street, and if consistent with the City's goals for a multi-modal transportation network	SFMTA, in consultation with ERO as necessary	5 percent addition to southbound volume determined: Date: _____ Fair share contribution made: Date: _____
Mitigation Measure M-CC-TR-1(c)				
Upon completion of the proposed project, the SFMTA shall regularly monitor vehicular congestion. If the project adds more than 5 percent of the westbound through movement volume at Geneva Avenue and Schwerin Street, and if consistent with the City's goals for a multi-modal transportation network, then the project sponsor shall work with the SFMTA to add a right-turn pocket at the intersection of Geneva Avenue and Schwerin Street on the westbound and southbound approaches. The project sponsor, or is successor(s), shall make a fair share contribution of funding for the improvement.	Project sponsor	If SFMTA finds that project adds more than 5 percent of the westbound through movement volume at Geneva Avenue and Schwerin Street, and if consistent with the City's goals for a multi-modal transportation network	SFMTA, in consultation with ERO as necessary	5 percent addition to westbound volume determined: Date: _____ Fair share contribution made: Date: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Noise				
Mitigation Measure M-NO-1a: Construction Specifications to Reduce Noise Levels During Construction				
The project sponsor shall incorporate the following practices into the construction specifications documents to be implemented by the project contractor: • Provide enclosures and mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy operations, such as grading or use of concrete saws within 50 feet of an occupied sensitive land use. • Use construction equipment with lower (less than 70 dB) noise emission ratings whenever possible, particularly air compressors and generators. • Do not use equipment on which sound-control devices provided by the manufacturer have been altered to reduce noise control. • Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from these sensitive receptors. • Prohibit unnecessary idling of internal combustion engines. • Require applicable construction-related vehicles and equipment to use designated truck routes to access the project site. Construction traffic should be routed along Geneva Avenue, Brookdale Avenue and Santos Street and should be managed to avoid peak periods. • Implement noise attenuation measures to the extent feasible (i.e., such that they do not impede efficient operation of equipment or dramatically slow production rates), which may include, but are not limited to, noise barriers or noise blankets. The placement of such attenuation measures shall be reviewed and approved by the Director of Public Works prior to issuance of development permit for construction. • Designate a Noise Disturbance Coordinator who shall be responsible for responding to complaints about noise during construction. The telephone number of the Noise Disturbance Coordinator shall be conspicuously posted at the construction site and shall be provided to the City. Copies of the construction schedule shall also be posted at nearby noise-sensitive areas.	Project sponsor / contractor(s)	Specifications included in construction specification documents; implemented during construction	ERO, in consultation with Director of Public Works	Date of final construction specification documents with incorporated specifications: _____ Date of approval of attenuation measures by Director of Public Works: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Noise				
Mitigation Measure M-NO-1b: Noise Reduction Building Strategies				
For new residential development located along Sunnydale Avenue and Santos Street, the Planning Department and Department of Building Inspection shall require the sponsor to use building materials sufficient to maintain an interior noise level of 45 dBA DNL. The determination of the final specifications shall be completed by a person(s) qualified in acoustical analysis and shall demonstrate with reasonable certainty that the applicable interior noise level can be met. There are a number of measures that could be implemented to achieve this standard. Some examples include: • Installation of forced-air ventilation and sound rated construction materials. • Installation of noise insulation features such as stucco-sided walls with resilient furring elements and sound-rate windows and doors.	Project sponsor / contractor(s)	Included in final specifications prior to construction	ERO, in consultation with the Department of Building Inspection	Final specifications completed: Date: _____
Mitigation Measure M-NO-1c: Noise Minimization for Residential Open Space				
To minimize effects on residential development at the project site, the Planning Department, through its building permit review process and in conjunction with the noise analysis set forth in Mitigation Measure M-NO-1b, shall require that open space required under the *Planning Code* for residential uses be protected, to the maximum feasible extent, from existing ambient noise levels sufficient to maintain an exterior noise level of 70 dBA DNL for outdoor open spaces. The determination of the final specifications shall be completed by a person(s) qualified in acoustical analysis and shall demonstrate with reasonable certainty that the applicable interior noise level can be met. Implementation of this measure could involve, among other things, site design that uses the building itself to shield on-site open space from the greatest noise sources, construction of noise barriers between noise sources and open space, and appropriate use of both common and private open space in multi-family dwellings, and implementation would also be undertaken consistent with other principles of urban design.	Project sponsor / contractor(s)	Included in final specifications prior to construction	ERO, through Planning Department's permit review process	Final specifications completed: Date: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Air Quality				
Mitigation Measure M-AQ-1: Construction Emissions Minimization				
A. Construction Emissions Minimization Plan (EMP). Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the ~~following~~ requirements below. The project sponsor or construction contractor shall assign a construction manager to ensure compliance with the requirements: 1. All off-road equipment greater than 25 hp and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements: a) Where access to alternative sources of power are available, portable diesel engines shall be prohibited; b) All off-road equipment shall have: i. Engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 3 off-road emission standards, *and* ii. Engines that are retrofitted with an ARB Level 3 Verified Diesel Emissions Control Strategy (VDECS).[3] c) Exceptions: i. Exceptions to A(1)(a) *may* be granted if the project sponsor has submitted information providing evidence to the satisfaction of the ERO that an alternative source of power is limited or infeasible at the project site and that the requirements of this exception provision apply. Under this circumstance, the sponsor shall submit documentation of compliance with A(1)(b) for onsite power generation. ii. Exceptions to A(1)(b)(ii) *may* be granted if the project sponsor has submitted information providing evidence to	Project sponsor/ contractor(s)	Prior to issuance of a permit specified in Section 106A.3.2.6 of the Francisco Building Code. Implementation throughout construction activities.	Project sponsor/ contractor(s) to submit EMP; ERO to approve EMP and ensure implementation.	Considered complete on finding by ERO that Plan is complete. Date EMP approved by the ERO: _____

[3] Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

<table>
<tr><th>Adopted Mitigation Measures</th><th>Responsibility for Implementation</th><th>Mitigation Schedule</th><th>Monitoring/ Reporting Responsibility</th><th>Monitoring Schedule</th></tr>
<tr><td colspan="5">Mitigation Measures Agreed to by Project Sponsor (cont.)</td></tr>
<tr><td colspan="5">Air Quality (cont.)</td></tr>
<tr><td colspan="5">Mitigation Measure M-AQ-1: Construction Emissions Minimization (cont.)</td></tr>
<tr><td>the satisfaction of the ERO that a particular piece of off-road equipment with an ARB Level 3 VDECS is: (1) technically not feasible, (2) would not produce desired emissions reductions due to expected operating modes, (3) installing the control device would create a safety hazard or impaired visibility for the operator, or (4) there is a compelling emergency need to use off-road equipment that are not retrofitted with an ARB Level 3 VDECS and the sponsor has submitted documentation to the ERO that the requirements of this exception provision apply. If granted an exception to A(1)(b)(ii), the project sponsor must comply with the requirements of A(1)(c)(iii).
iii. If an exception is granted pursuant to A(1)(c)(ii), the project sponsor shall provide the next cleanest piece of off-road equipment as provided by the step down schedules in Table 1.
TABLE 1: OFF-ROAD EQUIPMENT COMPLIANCE STEP-DOWN SCHEDULE
<table>
<tr><th>Compliance Alternative</th><th>Engine Emission Standard</th><th>Emissions Control</th></tr>
<tr><td>1</td><td>Tier 3</td><td>ARB Level 2 VDECS</td></tr>
<tr><td>2</td><td>Tier 3</td><td>ARB Level 1 VDECS</td></tr>
<tr><td>3</td><td>Tier 3</td><td>Alternative Fuel*</td></tr>
</table>
How to use the table: If the requirements of (A)(1)(b) cannot be met, then the project sponsor would need to meet Compliance Alternative 1. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 1, then Compliance Alternative 2 would need to be met. Should the project sponsor not be able to supply off-road equipment meeting Compliance Alternative 2, then Compliance Alternative 3 would need to be met.
* Alternative fuels are not a VDECS.</td><td></td><td></td><td></td><td></td></tr>
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Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Air Quality (cont.)				
Mitigation Measure M-AQ-1: Construction Emissions Minimization (cont.)				
2. The project sponsor shall require the idling time for off-road and on-road equipment be limited to no more than two minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit. 3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications. <u>The project sponsor shall require that construction operators locate staging areas and stationary construction equipment, such as generators, as far as possible from sensitive receptors and building HVAC intakes.</u> 4. The Plan shall include estimates of the construction timeline by phase with a description of each piece of off-road equipment required for every construction phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date. For off-road equipment using alternative fuels, reporting shall indicate the type of alternative fuel being used. 5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.				

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Air Quality (cont.)				
Mitigation Measure M-AQ-1: Construction Emissions Minimization (cont.)				
B. ***Reporting.*** Quarterly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.	Project sponsor/ contractor(s)	Quarterly during construction.	ERO to receive reports.	Considered complete on findings by ERO that Plan is being/ has been implemented. Date plan deemed implemented by ERO: _____
Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.	Project sponsor/ contractor(s)	Within six months of completion of construction activities.	ERO to receive reports.	Date report submitted to ERO: _____
C. ***Certification Statement and On-site Requirements.*** Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.	Project sponsor/ contractor(s)	Prior to construction activities requiring the use of off-road equipment	ERO to receive certification statement.	Considered complete on submittal of certification statement. Date certification statement submitted to ERO: _____
Biological Resources				
Mitigation Measure M-BI-1a: Protection of Special Status Bat Species				
The project sponsor shall implement the following measures: • Prior to construction or demolition activities within 250 feet of trees/structures with at least a moderate potential to support special-status bats, a qualified biologist (i.e., a biologist holding a CDFW collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle and collect bats) shall survey for bats. If no evidence of bats (i.e., visual or acoustic detection, guano, staining, strong odors) is present, no further mitigation is required.	Project sponsor/ contractor(s)	Prior to or demolition activities within 250 feet of trees/structures with at least a moderate potential to support special-status bats	ERO to receive copy of completed survey.	Survey completed: Date: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Biological Resources (cont.)				
Mitigation Measure M-BI-1a: Protection of Special Status Bat Species (cont.)				
• If special-status bats raising pups (also called a maternity colony) are identified within 250 feet of the project area during preconstruction surveys or project construction (typically, maternity colonies are active April 15th through August 15th), the project sponsor shall create a no-disturbance buffer acceptable in size to CDFW around the bat roosts. Bat roosts initiated within 250 feet of the project area after construction has already begun are presumed to be unaffected by project-related disturbance, and no buffer would be necessary. However, the "take" of individuals (e.g., direct mortality of individuals, or destruction of roosts while bats are present) is prohibited. Trees or buildings with evidence of special-status bat activity shall be removed during the time that is least likely to affect bats as determined by a qualified bat biologist (in general, roosts should not be removed if maternity bat roosts are present, typically April 15th through August 15th, and roosts should not be removed if present bats are in torpor, typically when temperatures are less than 40 degrees Fahrenheit). Non-maternity bat roosts shall be removed by a qualified biologist, by either making the roost unsuitable for bats by opening the roost area to allow airflow through the cavity, or excluding the bats using one-way doors, funnels, or flaps.	Project sponsor/ contractor(s)	If identified during preconstruction surveys or construction, then • no-disturbance buffer in place April 15th through August 15th • tree / building removal during April 15th through August 15th	Project sponsor/ contractor(s), under supervision of ERO	Considered complete upon removal / protection of all trees / structures with at least a moderate potential to support special-status bats
• All special-status bat roosts that are destroyed shall be replaced at a 1:1 ratio with a roost suitable for the displaced species. The type of created roosting habitat would be reflective of the habitat preference of the displaced species and would be determined by the bat biologist. An example would be bat boxes for colonial roosters. The roost shall be modified as necessary to provide a suitable roosting environment for the target bat species.	Project sponsor/ contractor(s)	Prior to project occupancy	Project sponsor/ contractor(s), under supervision of ERO	Considered complete upon installation of replacement roosts: Date: _____
Mitigation Measure M-BI-1b: Protection of Nesting Birds				
The project sponsor shall implement the following: • Preconstruction bird surveys shall be conducted by a qualified biologist during the breeding season (breeding season is defined as February 1st through August 15th) if tree removal or building demolition is scheduled to take place during the breeding season.	Project sponsor/ contractor(s)	During the breeding season if tree removal or building demolition is scheduled to take place	ERO to receive copy of completed survey	Survey completed: Date: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Biological Resources (cont.)				
Mitigation Measure M-BI-1b: Protection of Nesting Birds (cont.)				
• For raptors, a preconstruction survey for nests and nesting birds shall be conducted within 2 weeks prior to initiation of construction activities if work shall occur during the breeding season. A qualified biologist shall survey all potential nesting sites in the construction limits and within 300 feet and in line of sight of the construction limits. If active nests are located, work shall not occur within 300 feet of the nest until an appropriate buffer zone has been established in coordination with the appropriate agencies (i.e., USFWS and/or CDFW). • For other nesting birds protected by the Migratory Bird Treaty Act, a pre-construction survey for active nests shall be conducted by a qualified biologist no more than 2 weeks before construction if work shall occur during the breeding season. The survey shall be conducted within 100 feet of the work areas. If construction would affect the nest, then work shall not occur within 100 feet of the nest until a qualified biologist, in coordination with the appropriate agencies, has established an appropriate buffer zone. • Special-status birds that establish nests during the construction period are considered habituated to such activity and no buffer shall be required, except as needed to avoid direct destruction of the nest, which would still be prohibited. Outside of the breeding season (August 16th through January 31st), or after young birds have fledged, as determined by the biologist, work activities may proceed.	Project sponsor/ contractor(s)	Survey within 2 weeks prior to initiation of construction activities. Buffer zones established prior to construction activities.	ERO to receive copy of completed survey	Survey completed: Date: _____ Buffer zones established: Date: _____
Hazards/Hazardous Materials				
Mitigation Measure M-HZ-1: Hazardous Building Materials				
The project sponsor shall ensure that PCB-containing equipment, such as fluorescent light ballasts and other potentially hazardous building materials, are removed and properly disposed of prior to the start of demolition. Old light ballasts that would be removed during demolition would be evaluated for the presence of PCBs. In the case where the presence of PCBs in the light ballast could not be verified, then they would be assumed to contain PCBs and handled and disposed of as such, according to applicable laws and regulations. Any other hazardous materials identified either before or during demolition would be abated according to federal, state, and local laws and regulation.	Project sponsor/ contractor(s)	Prior to start of demolition. Implementation during demolition activities.	Project sponsor/ contractor(s) and DPH as necessary	Date demolition completed: _____

Adopted Mitigation Measures	Responsibility for Implementation	Mitigation Schedule	Monitoring/ Reporting Responsibility	Monitoring Schedule
Mitigation Measures Agreed to by Project Sponsor (cont.)				
Hazards/Hazardous Materials (cont.)				
Mitigation Measure M-HZ-2: Site Mitigation Plan and Radon Survey				
The project sponsor shall retain a qualified environmental consulting firm to prepare a Site Mitigation Plan (SMP) to address the possible discovery of unexpected contaminants during construction. The SMP shall specify procedures to follow upon discovery of suspect soils and include appropriate notification, handling, and disposal protocols. The SMP shall also include contingency response actions, worker health and safety protocols, stormwater protection measures, dust mitigation in accordance with San Francisco Health Code Article 22B, and noise control in accordance with San Francisco Noise Ordinance. The project sponsor shall also prepare work plan describing procedures for the completion of a radon soil vapor survey to be conducted prior to construction. The SMP and radon soil survey work plan shall be submitted to the San Francisco Department of Public Health for review and approval prior to commencement of construction activities.	Project sponsor/ contractor(s)	Prior to demolition or construction. Implementation during demolition activities.	SMP and radon soil vapor survey plan shall be submitted to SFDPH for review and approval	Both plans submitted: Date: _____
Improvement Measures Agreed to by Project Sponsor				
Improvement Measure I-TR-D				
The project sponsor could work with Recology, the City's designated trash, recycling, and compost hauler, and with the San Francisco Department of the Environment and the SFMTA's Sustainable Streets Division as master planning proceeds to the schematic design stage for the proposed buildings, to ensure that trash, recycling, and composting facilities are designed to ensure maximum diversion of trash from the City's landfill and that the collection bins are stored in such locations to maximize efficiency in container pickup and minimize traffic disruption during collection.	Project sponsor/ contractor(s)	As master planning proceeds to the schematic design stage for the proposed buildings	ERO, in consultation with Recology, San Francisco Department of the Environment and the SFMTA's Sustainable Streets Division	
Improvement Measure I-CC-TR				
The project sponsor could work with SFMTA to prohibit left turns at the intersection of Geneva Avenue and Brookdale Avenue by installing raised pavement markers.	Project sponsor/ contractor(s)	If SFMTA determines left turns shall be prohibited	SFMTA, in consultation with ERO as necessary	Considered complete upon installation of raised pavement markers