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ADDENDUM NO. 1 TO ENVIRONMENTAL IMPACT REPORT

Date of Publication of Addendum:	April 10, 2025
Date of EIR Certification:	February 27, 2020
EIR Title:	3700 California Street Project
EIR Case No.:	2017-003559ENV
Modified Project Title:	3700 California Street Project
Modified Project Case No.:	2017-003559ENV-02
Block/Lot:	1015/001, 052, 053; 1016/001-009; 1017/027, 028
Modified Project Sponsor:	Lisa Congdon, 3700 California Street, LLC lcongdon@pradogroup.com
Lead Agency:	San Francisco Planning Department
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Remarks

Background

On February 27, 2020, the San Francisco Planning Commission certified the 3700 California Street Environmental Impact Report (EIR), Case No. 2017-003559ENV.[1] Revisions and clarifications to the project were provided as part of the responses-to-comments (RTC) document prepared for the certification hearing. The 3700 California Street EIR analyzed demolition of five of the six existing hospital buildings on the 4.9-acre project site, including an accessory off-street parking garage; demolition of a two-story, below-grade parking structure; renovation and adaptive reuse of a portion of the Marshal Hale hospital building at 3698 California Street for residential use; retention and renovation of the existing nine-unit residential building at 401 Cherry Street; and construction of 31 new residential buildings, including accessory amenity spaces with landscaped common areas and a fitness facility.

The project would be constructed on three blocks along California Street between Spruce Street and Arguello Boulevard. The residential buildings on the project site would contain a total of 273 dwelling units, including 14 single-family homes and 19 multi-family residential buildings with studios and one-, two-, three-, and four-bedroom units, for a total of approximately 627,200 square feet of residential uses. The project would include shared onsite amenity space and approximately 88,100 square feet of private and

[1] San Francisco Planning Department, *3700 California Street Final Environmental Impact Report*, Planning Department Case No. 2017-003559ENV, State Clearinghouse No. 2018092043, certified February 27, 2020.

common open space areas for residents. The new multi-family residential buildings, ranging from three to seven stories (36 to 80 feet), would be situated above below-grade parking podiums on each block. With the exception of 12 of the 14 proposed single-family homes that would be on separate lots, all residential buildings would be situated above below-grade parking podiums on each block. The new single-family homes would be constructed on separate lots and include private parking garages. A total of 416 parking spaces would be provided across the project site, consisting of 392 subterranean spaces in podiums, 24 private spaces within the 12 single-family residences, and five freight loading spaces. In addition, the project would provide 411 Class 1 bike storage spaces, 22 Class 2[2] bike storage spaces, 13 spaces for cargo bikes, a bike repair station, two required car-share spaces, and five optional car-share spaces.

The project would reuse seven of the 14 existing curb cuts and remove seven others; 11 new curb cuts would be added, for a total of 18 curb cuts. Twelve of the 18 curb cuts would be for the single-family homes. The proposed project's driveways would include one 10-foot-wide curb cut for each of the single-family homes, two 10-foot-wide curb cuts for the multi-family garage on Block A (for passenger vehicles only), one 18-foot-wide curb cut for each end of the multi-family parking garage on Block B (for passenger and freight vehicles), and one 18-foot curb cut along Maple Street and one 18-foot curb cut along California Street for the multi-family parking garage on Block C , thereby meeting the Better Streets Plan's recommended widths. This is consistent with the recommended practices for curb cuts and driveways presented in the City's Better Streets Plan.

The proposed project is hereafter referred to as the "EIR project." Refer to Figure 1, p. 4, for the EIR project site plan.

Proposed Modifications to EIR Project

Subsequent to certification of the EIR, the EIR project was revised. The revision is referred to herein as the "modified project." The modified project would include demolition of five of the six existing hospital buildings on the project site, adaptive reuse and expansion of the Marshal Hale hospital building at 3698 California Street for residential and institutional uses, retention of the existing nine-unit residential building at 401 Cherry Street, and construction of 19 new residential buildings. The modified project would be constructed on three blocks. From west to east, the three blocks are referred to as Blocks A, B, and C, respectively. Residential buildings would range from three to seven stories (40 to 80 feet) on Blocks A and B, and a seven-story (80-foot), mixed-use residential and institutional (assisted living/memory care) building would be constructed on Block C.

Upon project completion, the modified project would provide a total of 493 residential units, including 15 single-family homes and four multi-family residential buildings, but not including the nine existing units to be retained at 401 Cherry Street. In addition, the modified project would include 74 institutional units for assisted living and memory care. Overall, the modified project would include a total of approximately

[2] Class 2 bike storage spaces are defined by Planning Code section 155.1(a) as "spaces located in a publicly accessible, highly visible location intended for transient or short-term use by visitors, guests, and patrons to the building or use."

664,000 square feet of residential uses. A total of 488 parking spaces would be provided, consisting of 458 spaces in the parking structures for the multi-family and assisted-living buildings and 30 private spaces for the 15 single-family residences on separate lots. The project details are described in more detail below.

Project Location and Site Characteristics

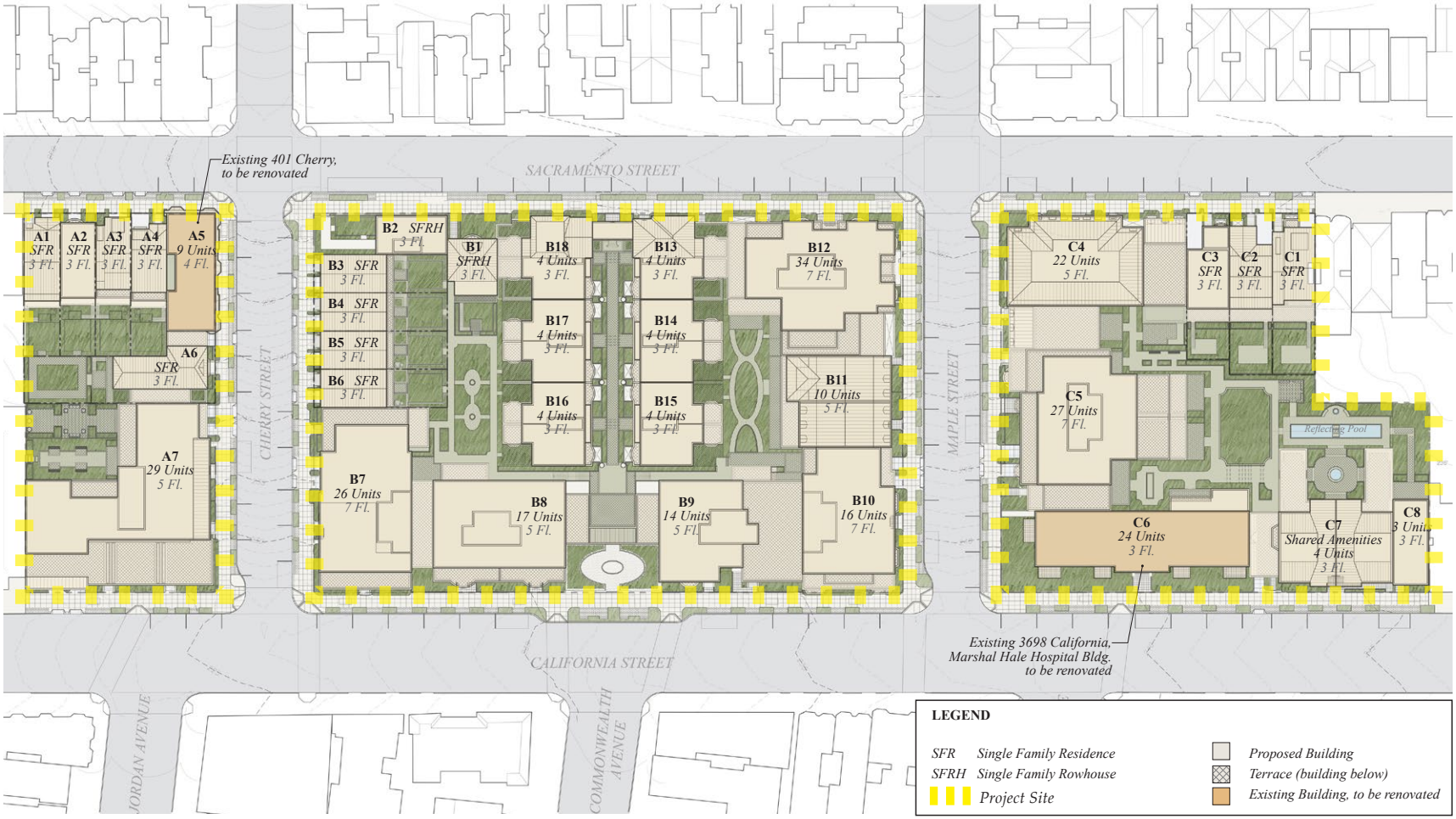
The modified project proposes redevelopment on a portion of the former site for the California Pacific Medical Center (CPMC) campus at 3700 California Street in the Presidio Heights neighborhood of San Francisco. The approximately 214,000-square-foot, 4.9-acre irregularly shaped project site encompasses 14 parcels on one full city block (Block 1016, Lots 001–009) and portions of two other blocks (Block 1015, Lots 001, 052, and 053, and Block 1017, Lots 027 and 028). As shown in Figure 2, p. 5, the project site is bounded by Sacramento Street to the north, residential uses to the east, California Street to the south, and medical office and residential uses to the west. The project site is primarily within an RM-2 (Residential, Mixed – Moderate Density) zoning district, with portions also in an RH-2 (Residential, House – Two Family) zoning district. In addition, the majority of the project site is in an 80-E height and bulk district, with the exception of two lots that cover approximately 8 percent of the project site and are in a 40-X height and bulk district.

As shown in Figure 3, p. 6, and Table 1, p. 7, the project site is currently developed and occupied by approximately 734,000 square feet of improvements within seven buildings, consisting of approximately 622,000 square feet of hospital/medical office facilities associated with CPMC; a nine-unit, approximately 7,000-square-foot residential building; and approximately 105,000 square feet of enclosed parking within two parking garages. These existing buildings range from three to eight stories (25 to 112 feet), with the most prominent building being the six-story hospital at 3700 California Street. The project site has a total of 333 enclosed parking spaces and 106 surface parking spaces. Refer to Table 1, p. 7, for a summary of the existing land uses on the project site.

Modified Project

Consistent with the EIR project, the modified project would include demolition of five of the six existing hospital buildings on the project site, including a five-story accessory parking garage; demolition of a two-level, below-grade parking structure; renovation, adaptive reuse, and expansion of the Marshal Hale hospital building at 3698 California Street for residential and institutional uses; and retention of the existing nine-unit residential building at 401 Cherry Street. However, the modified project would include the construction of 19 new residential buildings, including accessory amenity spaces with landscaped private common areas and other common amenity areas, instead of the 31 new residential buildings proposed under the EIR project (refer to Figures 4 through 11 [pp. 9—16]).

The modified project proposes residential buildings on the project site containing 493 units, including 15 single-family homes and four multi-family residential buildings, whereas the EIR project proposed 264 new residential units, including 14 single-family homes and 19-multi-family residential buildings; both projects would retain the nine units in the existing building at 401 Cherry Street, but renovation of these



SOURCE: 3700 California Street EIR (RAMSA. 2018. *3700 California Street, San Francisco, CA: EE Application—Revision*. June.)

Graphics... 00140.18 (10/31/18) AB

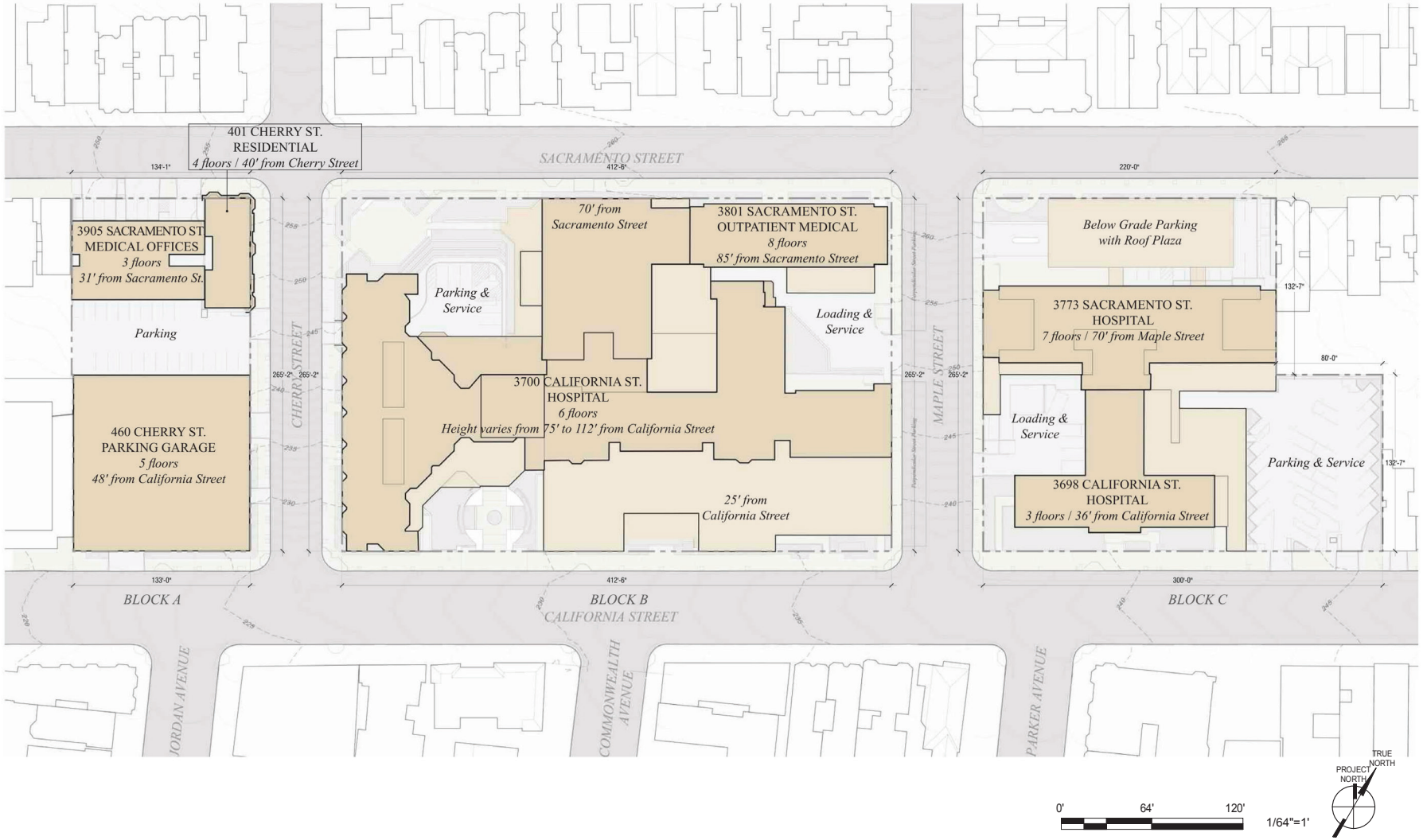
3700 California Street
Case No. 2017-003559ENV.02

Figure 1
EIR Project Site Plan

Graphics... 104980 (11-22-2024) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 2
Project Site Location



Source: 3700 California LLC, 2024.

Graphics... 104980 (11-22-2024) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 3
Existing Site Plan

Table 1: Existing Land Uses on the Project Site

Address	Assessor's Block/Lot(s)	Building Square Footage	Zoning District	Height/ Bulk District	Uses[e]
3905 Sacramento Street	1015/052	26,000	RH-2[a]	40-X[b]	Medical office building
401 Cherry Street	1015/001	7,000	RH-2	40-X	Residential
460 Cherry Street	1015/053	88,000	RM-2	80-E[c]	Parking garage
3700 California Street	1016/002–009	360,000	RM-2 and RH-2[d]	80-E	Hospital
3801 Sacramento Street	1016/001 and 002	69,000	RM-2	80-E	Outpatient/research
3773 Sacramento Street	1017/028	17,000 149,000	RM-2	80-E	Parking garage Hospital
3698 California Street (Marshal Hale building)	1017/027 and 028	18,000	RM-2	80-E	Breast Health Center, Newborn Connections, Skilled Nursing Facility, Alzheimer's Residential Care, and other support services
Total hospital square footage		622,000			
Total parking square footage		105,000			
Total residential square footage		7,000			
Total square footage		**734,000**			

Source: San Francisco Planning Department, *Final Environmental Impact Report—3700 California Street*, Case No. 2017-003559ENV, 2019.

Notes:

a. RH-2: Residential, House – Two Family.
b. 40-X: Buildings within the 40-X district cannot exceed 40 feet in height and do not have a bulk limit.
c. 80-E: Buildings within the 80-E district cannot exceed 80 feet in height (building areas exceeding 65 feet in height have bulk limit dimensions of 110 feet [length] and 140 feet [diagonal]).
d. RM-2: Residential, Mixed – Moderate Density (Lots 004–009 are in the RH-2 zoning district).
e. Other than the residential building at 401 Cherry Street, all uses on the site are vacant at the time of preparation of this addendum.

units was proposed in the EIR project and not in the modified project. The modified project also proposes 74 institutional units for assisted living and memory care, which were not included as part of the EIR project.

Under the EIR project, 69[3] studios and one-bedroom units, 88 two-bedroom units, 96 three-bedroom units, and 20 four-bedroom units would be provided across Blocks A, B, and C. Under the modified project, the new residential units on Block A and B would consist of 39 studios, 115 one-bedroom units, 150 two-bedroom units, 16 three-bedroom units, and 15 single-family homes with four bedrooms in each.

[3] Including the nine units at 401 Cherry Street, which were proposed to be retained and renovated.

The 158 residential units in the mixed-use building on Block C would be designed as senior-resident units, consisting of 10 studios, 97 one-bedroom, and 51 two-bedroom units. The institutional uses on Block C would include 74 assisted-living and memory-care units, consisting of 39 studios, 23 one-bedroom units, and 12 two-bedroom units.

Consistent with the EIR project, the modified project would be constructed on three blocks with residential buildings ranging from three to seven stories (40 to 80 feet). Block C would differ from the EIR project with construction of a mixed-use, seven-story (80-foot) residential and institutional building. The 15 single-family homes would be on separate lots. A total of 488 parking spaces would be provided under the modified project, consisting of 458 spaces in the parking structures for the multi-family and assisted-living buildings and 30 private spaces for the 15 single-family residences on separate lots. This is 72 more than the 416 parking spaces provided under the EIR project, which had 392 spaces in the parking structures and 24 private parking spaces for the single-family residences. The modified project would include six car-share spaces (three required and three optional), compared with 10 car-share spaces under the EIR project (five required and five optional); five off-street loading spaces, compared with four previously; and nine on-street passenger loading spaces, as well as an additional passenger porte-cochere, compared with 11 on-street passenger loading spaces previously (refer to Table 3, p. 19). The EIR project would provide 411 Class 1 bicycle parking spaces and 22 Class 2 bicycle parking spaces, whereas the modified project would provide 244 weather-protected Class 1 bicycle parking spaces and 30 publicly accessible Class 2 bicycle parking spaces.[4] Under the modified project, the residential multi-family buildings on Blocks A and B would include 20,500 square feet of onsite amenity space and approximately 37,700 square feet of common open space. Unlike the EIR project, the modified project would include a residential and institutional mixed-use building on Block C, which would provide approximately 8,500 square feet of institutional amenity space and 25,000 square feet of residential amenity space, including an approximately 12,000-square-foot restaurant space along Sacramento Street. To offer flexibility and a benefit to the neighborhood, approximately 4,800 square feet of the restaurant space would be publicly accessible; the remaining approximately 7,200 square feet would be an accessory amenity space for project residents only.

Under the modified project, the 14 existing parcels that make up the project site would be merged and subdivided into 20 parcels; under the EIR project, the 14 existing parcels would be merged and subdivided into 16 parcels. Refer to Table 2, p. 17, for a breakdown of project characteristics by block and building and Table 3, p. 19, for a summary comparison between the EIR project and modified project.

BLOCK A

Block A is bounded by Sacramento Street to the north, Cherry Street to the east, California Street to the south, and medical office and residential uses to the west. Consistent with the EIR project, the modified project would demolish the medical office building at 3905 Sacramento Street and the parking garage at 460 Cherry Street. The modified project would retain the nine-unit residential building at 401 Cherry Street

[4] Modified bicycle parking meets project transportation demand management requirements.

Source: 3700 California LLC.

Graphics ... 104980 (02-06-2025) JC

3700 California Street
Case No. 2017-003559ENV.02

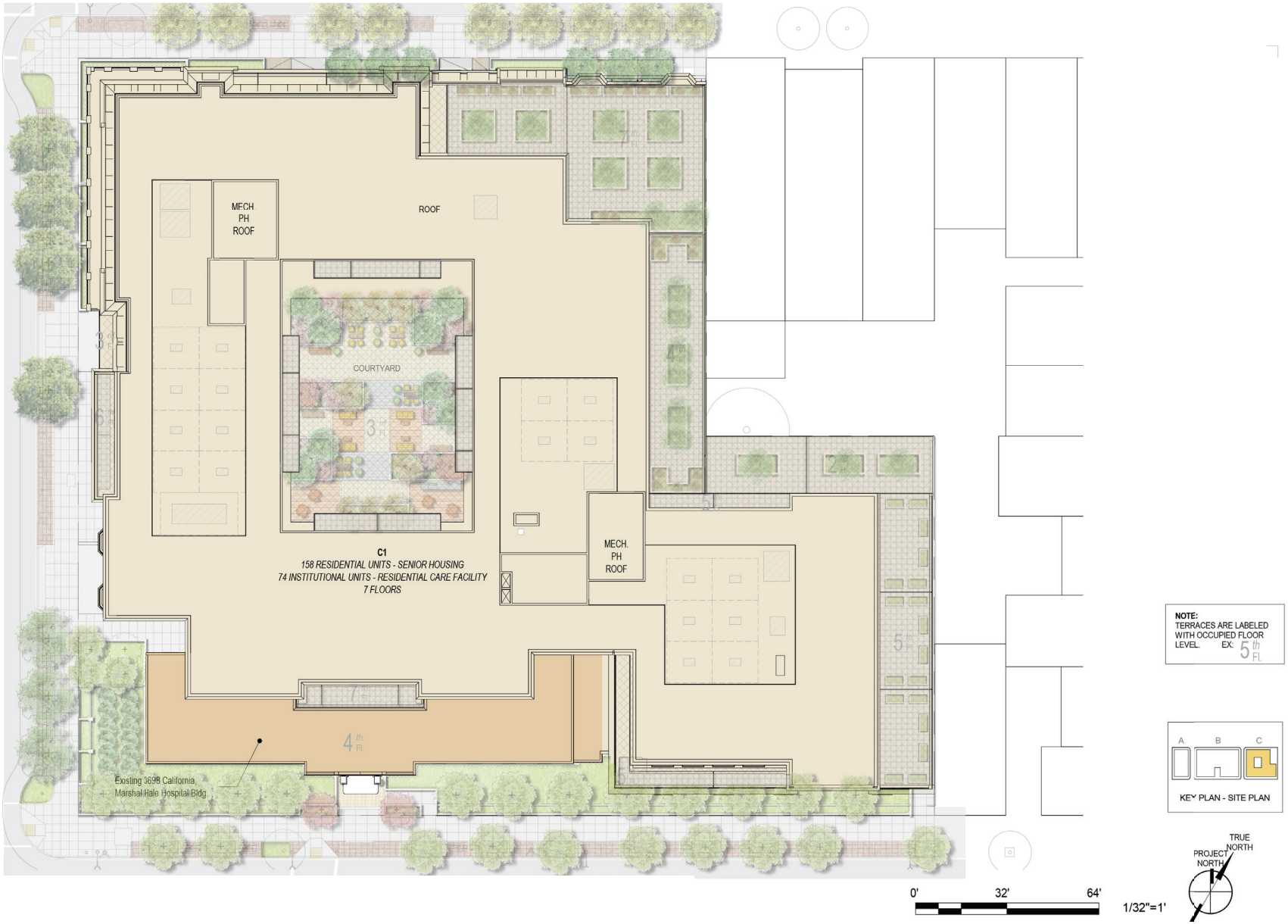
Figure 4
Block A Site Plan

Source: 3700 California LLC.

Graphics ... 104980 (02-06-2025) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 5
Block B Site Plan



Source: 3700 California LLC.

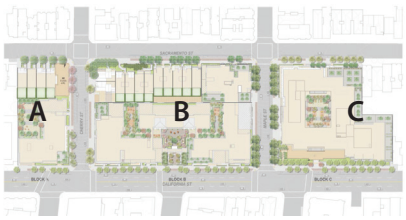
Graphics ... 104980 (02-06-2025) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 6
Block C Site Plan

Modified Project View

EIR Project View



Source: 3700 California LLC.

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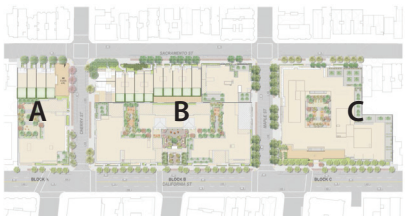
3700 California Street
Case No. 2017-003559ENV.02

Figure 7
Project Rendering-California Street

Modified Project View

EIR Project View



Source: 3700 California LLC.

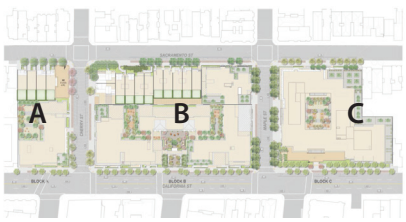
Graphics ... 104980 (02-06-2025) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 8
Project Rendering-Cherry Street

Modified Project View

EIR Project View

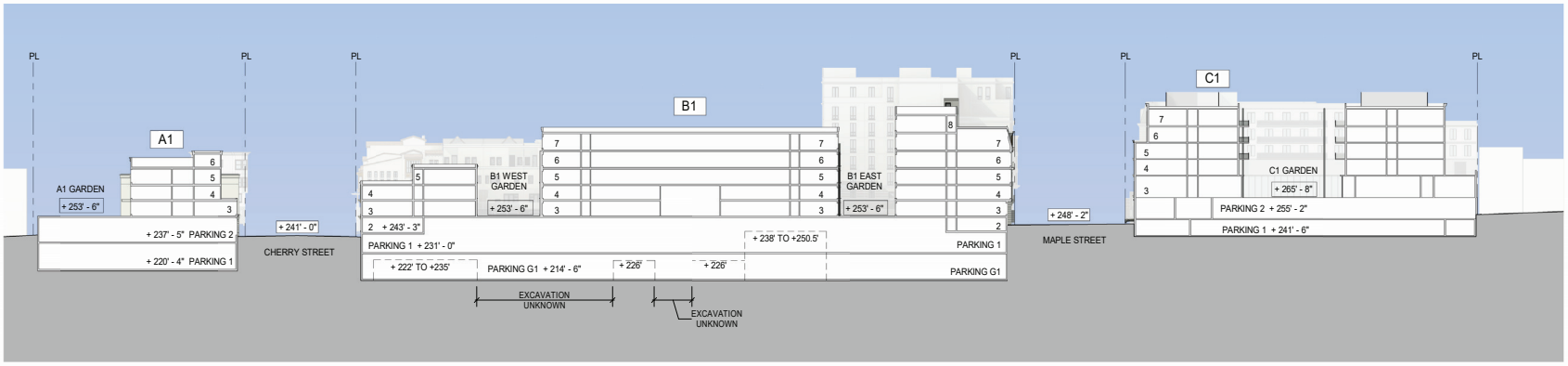


Source: 3700 California LLC.

Graphics ... 104980 (02-06-2025) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 9
Project Rendering-Sacramento Street

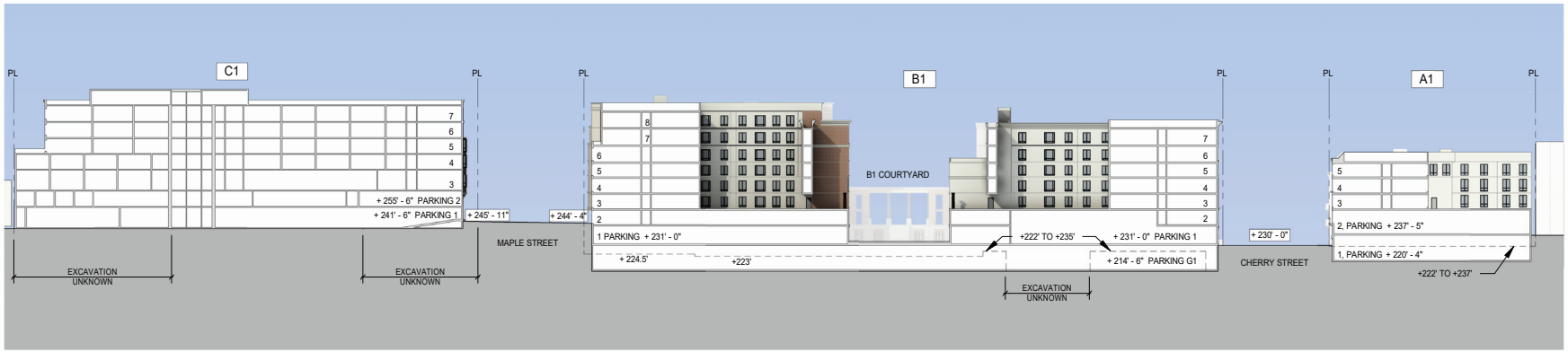


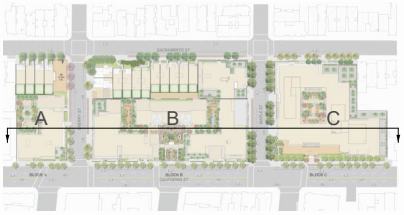
Source: 3700 California LLC.

Graphics ... 104980 (02-06-2025) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 10
West-East Cross-Section





Source: 3700 California LLC.

Graphics ... 104980 (02-06-2025) JC

3700 California Street
Case No. 2017-003559ENV.02

Figure 11
East-West Cross-Section

Table 2: Modified Project Characteristics

Building	Lot Area (Square Feet)	Floors	Roof Height	Building Area (Square Feet)	Amenities (Square Feet)	Total Number of Units	Parking Spaces	Private Open Space (Square Feet)	Common Open Space (Square Feet)
Block A									
A1 (MF)	23,600	5	65	76,200	2,200	45	57	—	7,500
A2 (MF-existing)[a]	2,800	3	40	7,000	—	—	—	—	—
A3 (SFR)	2,300	3	40	5,300	—	1	2	700	—
A4 (SFR)	2,300	3	40	5,400	—	1	2	700	—
A5 (SFR)	2,300	3	40	5,300	—	1	2	700	—
A6 (SFR)	2,300	3	40	5,300	—	1	2	700	—
Block B									
B1 (MF)	68,100	7	80	378,700	15,600	224	239	4,300	24,200
B2 (MF)	13,200	7	80	113,000	2,800	51	53	400	6,000
B3 (SFR)	2,500	3	40	4,600	—	1	2	500	—
B4 (SFR)	2,500	3	40	4,300	—	1	2	500	—
B5 (SFR)	2,500	3	40	4,300	—	1	2	500	—
B6 (SFR)	2,500	3	40	4,200	—	1	2	500	—
B7 (SFR)	2,500	3	40	4,200	—	1	2	500	—
B8 (SFR)	2,500	3	40	4,100	—	1	2	500	—
B9 (SFR)	2,500	3	40	4,100	—	1	2	500	—
B10 (SFR)	2,500	3	40	4,200	—	1	2	500	—
B11 (SFR)	2,500	3	40	4,200	—	1	2	500	—
B12 (SFR)	2,400	3	40	3,500	—	1	2	300	—
B13 (SFR)	3,000	3	40	3,400	—	1	2	1,300	—

Building	Lot Area (Square Feet)	Floors	Roof Height	Building Area (Square Feet)	Amenities (Square Feet)	Total Number of Units	Parking Spaces	Private Open Space (Square Feet)	Common Open Space (Square Feet)
Block C									
C1 (MF-Senior Housing, Institutional-Assisted Living, and Memory Care)	68,900	7	80	311,500	33,400	232 (158 residential and 74 institutional)	109	6,800	12,100
TOTAL				**945,600[a]**	**53,900**	**567**	**488**	**20,900**	**49,800**

Notes: Numbers may not sum because of rounding.
SFR = single-family residence. MF = multi-family residence.

[a] A2 units are not accounted for in the modified project summary. The total areas for the multi-family buildings include parking area. Without parking, the total areas for the multi-family buildings would be approximately 60,400 square feet for A1, 277,400 square feet for B1, 78,200 square feet for B2, and a total of 270,400 square feet for C1, broken down to approximately 202,100 square feet of residential, 63,500 square feet of institutional, and 4,800 square feet of restaurant.

Table 3. EIR Project and Modified Project Summary

Characteristics	EIR Project	Modified Project	Difference
Number of Buildings	33 (31 new and retention of 2)	21 (19 new and retention of 2)	-12
Maximum Building Height (feet)	80	80	0
Maximum Depth of Excavation (feet)	75	36	-39
Residential Units	273[a]	493[b]	+220
Single-family/4-bedroom Townhome	*14*	*15*	*+1*
Multi-family Units	*259*	*320*	*+61*
Multi-family Studio	*13*	*39*	*+26*
Multi-family 1 Bedroom	*56*	*115*	*+59*
Multi-family 2 Bedroom	*88*	*150*	*+62*
Multi-family 3 Bedroom	*96*	*16*	*-80*
Multi-family 4 Bedroom	*6*	*0*	*-6*
Senior Housing Units	—	*158*	*+158*
Senior Studio	—	*10*	*+10*
Senior 1 Bedroom	—	*97*	*+97*
Senior 2 Bedroom	—	*51*	*+51*
Institutional Housing Units	—	74	+74
Institutional Studio	—	*39*	*+39*
Institutional 1 Bedroom	—	*23*	*+23*
Institutional 2 Bedroom	—	*12*	*+12*
Restaurant (square feet)	—	4,810	+4,810

Characteristics	EIR Project	Modified Project	Difference
Car Parking (spaces)	421 (416 spaces for residential use plus 5 car-share spaces)	491 (488 spaces for residential use plus 3 car-share spaces)	+72
Bike Parking (spaces)	411 Class 1 22 Class 2 13 cargo bikes	244 Class 1 30 Class 2	-167 Class 1 +8 Class 2 -13 cargo bikes
Loading (spaces)	4 off-street loading 11 on-street passenger loading	5 off-street loading[c] 9 on-street passenger loading 1 passenger porte-cochere	+1 off-street loading -2 on-street loading +1 passenger porte-cochere
Lot Coverage (square feet)[d]	137,000	145,600	+8,600
Open Space (square feet)	88,100	70,700	-17,400
Net Interior Area (square feet)	434,200	518,100	+84,000
GSF (no parking)[e]	625,500	732,300	+106,800
+ Parking GSF	430,900	213,300	-217,700
TOTAL GSF[e]	**1,056,400**	**945,600**	**-110,900**

Notes: Numbers may not sum because of rounding.

a. The EIR project proposed 264 new units along with the retention and renovation of the existing nine-unit building at 401 Cherry Street.
b. The modified project proposes 493 new units, along with retention of the existing nine-unit building at 401 Cherry Street. The modified project does not propose any changes to the 401 Cherry Street building, and the nine units are not included as part of the total units.
c. Three of the five off-street loading spaces do not meet the dimensional requirements defined under the San Francisco Planning Code and require a planned unit development (PUD) exception.
d. The total lot/parcel area is 213,800 square feet
e. GSF = gross square feet

(referred to as Building A2) but would not renovate these units as under the EIR project. However, as shown in Figure 4, p. 9, under the modified project, five new residential buildings would be constructed, including both single-family and multi-family buildings ranging in height from three stories (40 feet) to five stories (65 feet); six new residential buildings were proposed under the EIR project.

Under the modified project, along Sacramento Street and Cherry Street (south of 401 Cherry Street), four single-family, three-story residences (Buildings A3, A4, A5, and A6) with a height of 40 feet would be constructed on separate lots, with each lot providing two parking spaces, instead of the five single-family, three-story residences proposed under the EIR project. In addition, a five-story, 45-unit multi-family residential building (Building A1) would be constructed at the corner of California and Cherry streets; this building would have a height of 65 feet under the modified project. The EIR project proposed a five-story, 29-unit multi-family residential building.

Under the EIR project, Block A would be excavated 13 feet below grade to construct a two-level subterranean parking podium with 57 parking spaces and 65 Class 1 bicycle parking spaces, which would be accessible from California Street. In comparison, under the modified project, Block A would be excavated 27 feet below grade to construct a two-level subterranean parking podium with 57 parking spaces and 46 Class 1 bicycles spaces in a bike room with a bicycle repair station. One parking podium would be accessible from California Street, and an additional parking podium would be accessible from Cherry Street. Approximately 2,200 square feet of shared amenities would be provided in Block A under the modified project. In addition, approximately 2,800 square feet of private open space and 7,500 square feet of common open space for residents would be provided under the modified project compared to approximately 11,200 square feet of private open space and 3,900 square feet of common open space under the EIR project. Under the modified project, two of the existing three lots on Block A would be merged and subdivided into five parcels with a total lot area of approximately 32,600 square feet, with the lot containing the 401 Cherry Street building remaining as is, instead of being merged and subdivided into seven parcels as under the EIR project.

BLOCK B

Block B is bounded by Sacramento Street to the north, Maple Street to the east, California Street to the south, and Cherry Street to the west. Consistent with the EIR project, the modified project would demolish all existing buildings on Block B. However, unlike the EIR project, the modified project would construct 13 new residential buildings, ranging in height from three stories (40 feet) to seven stories (80 feet), compared to 18 new residential buildings under the EIR project. As shown in Figure 5, p. 10, the 11 three-story, single-family residences (Buildings B3, B4, B5, B6, B7, B8, B9, B10, B11, B12, and B13) proposed by the modified project would be primarily along Sacramento Street but also at the corner of Sacramento and Cherry streets. The remainder of Block B would comprise two multi-family buildings (B1 and B2). Building B1 would front onto Cherry, California, and Maple streets and be oriented around a central internal courtyard. Building B2 would front onto Maple and Sacramento streets.

The taller multi-family buildings on Block B would have a height of 80 feet and a total of 275 multi-family dwelling units compared to the 141 multi-family dwelling units under the EIR project. Approximately 18,300 square feet of shared amenities (yet to be defined) would be provided on Block B.

Under the modified project, Block B would be excavated up to 36 feet below grade to create a two-level, below-grade parking structure, whereas the EIR project would excavate up to 75 feet below grade for a two-level, below-grade parking structure. The modified project's parking structure would include 292 parking spaces and 182 Class 1 bicycles spaces, along with a bicycle repair station; access would be from Cherry and Maple streets. The 11 single-family buildings, which would be on separate lots (B3 through B13), would each contain two parking spaces.

The modified project would have approximately 11,300 square feet of private open space and 30,200 square feet of common open space for residents on Block B compared to approximately 23,800 square feet of private open space and 15,900 square feet of common open space under the EIR project. Under the modified project, the nine existing lots on Block B would be merged and subdivided into 13 parcels with a total lot area of approximately 109,500 square feet instead of merged and subdivided into five parcels under the EIR project.

BLOCK C

Block C is bounded by Sacramento Street to the north, residential and some retail uses to the east, California Street to the south, and Maple Street to the west. As with the EIR project, the proposed project would demolish all buildings within the project site on Block C, with the exception of the older portion of the Marshal Hale hospital building at 3698 California Street, which would be renovated for adaptive reuse (i.e., the portion fronting California Street). Consistent with the EIR project, the modified project would also demolish the two-story, below-grade parking structure at 3773 Sacramento Street. However, unlike the EIR project, which would construct seven new buildings, consisting of three single-family, three-story residences and three multi-family residential buildings, as well as one shared amenity building; the modified project would construct one new mixed-use building (C1) with a height of seven stories (80 feet). As shown in Figure 6, p. 11, the mixed-use building would include multi-family senior housing as well as assisted-living and memory-care uses. Within the building, 158 multi-family senior dwelling units, 48 assisted-living dwelling units, and 26 memory-care dwelling units would be provided, along with a restaurant predominantly designed to serve the senior residential units, with an additional 4,800 square feet of area to serve as a publicly-accessible restaurant. Approximately 33,400 square feet of shared amenities would also be provided on Block C; the amenities would include e.g. a library, game room, pool, fitness center, salon, juice bar, and wellness lounge. Block C would be excavated up to 22 feet below grade to create a two-level, below-grade parking structure, whereas the EIR project would excavate up to 17 feet below grade for the two-level, below-grade parking structure. This structure would include 109 parking spaces and 20 Class 1 bicycle spaces; access would be from Maple Street.

Approximately 6,800 square feet of private open space and 12,100 square feet of common open space would be provided for residents on Block C under the modified project compared to approximately 12,700 square feet of private open space and 20,600 square feet of common open space under the EIR project. Under the modified project, the two existing lots on Block C would be merged into one parcel with a total lot area of approximately 69,000 square feet instead of merged and subdivided into four parcels under the EIR project.

Similar to the EIR project, although more extensive, the modified project would renovate and reuse the Marshal Hale hospital building on Block C. The rear wing of the building, constructed in 1940; the rear additions, constructed in 1970/1971; as well as the later additions to the east wing would be demolished. In addition, the

north façade and a portion of the east façade of the building would be demolished for a connection to the proposed new buildings. The proposed new construction would be set back from the original façade of the building; most of the building elevations on California and Maple streets would be retained. The existing windows along each façade would be replaced with new windows that would match the originals in material, design, and operation. In addition, the existing door on the Maple Street façade would be removed and replaced with a new window. The entry on California Street would be retained as an access point but with the existing door removed and replaced with a new door that would match the material, design, and operation of the original. The existing design elements of the building would be retained, and the façades would be re-painted.

PARKING AND LOADING

Under the EIR project, a total of 416 parking spaces would be provided onsite, consisting of 392 subterranean spaces and 24 at-grade private spaces for single-family residences within two-car garages. Block A would have 57 parking spaces in two below-grade parking levels, which would include three Americans with Disabilities Act–(ADA-) compliant spaces. Block B would have 215 parking spaces across two levels and include nine ground-level ADA-compliant spaces, two required and five optional car-share spaces, and four off-street loading spaces. Block C would have 120 parking spaces across two levels and include five ground-level ADA-compliant spaces and one off-street loading space.

As shown in Table 3, p. 19, the modified project would increase the number of parking spaces on the project site from 416 to 488. The 488 parking spaces would consist of 458 spaces in the parking structures for the multi-family and assisted-living buildings and 30 private spaces for the 15 single-family residences on separate lots. Block A would provide 57 parking spaces in a two-level subterranean parking podium structure, which would include four ADA-compliant spaces (on the ground level), and one loading space. Ingress and egress would be provided on California and Cherry streets. Block A is also encumbered by an access easement that provides access to the parking garage at 3838 California from Cherry Street, per an easement agreement between the two property owners. Similarly to the EIR project, the easement is retained by the modified project. Block B would provide a total of 292 parking spaces in a two-level, below-grade parking structure, which would include nine ADA-compliant spaces, two loading spaces, and six car-share spaces. Ingress and egress would be provided on Cherry and Maple streets. Block C would provide 109 parking spaces in a two-level, below-grade parking structure, which would include five ADA-compliant spaces, two loading spaces, and potentially two car-share spaces. Ingress and egress would be provided on Maple street, with a porte cochere along Sacramento Street. In addition, with implementation of the modified project, there would be a total of 66 parallel parking spaces along California, Maple, Sacramento, and Cherry streets compared to the 58 parking spaces that would be provided under the EIR project. Table 4 summarizes the off-street parking changes (i.e., subterranean parking and single-family residential parking) between the EIR project and the modified project.

BICYCLE PARKING

Under the EIR project, a total of 411 Class 1 bicycle parking spaces and 22 Class 2 bicycle parking spaces would be provided. In comparison, the modified project would provide a total of 244 Class 1 bicycle parking spaces. Under the modified project, the ground floor of Block A would contain 46 Class 1 spaces in a bike room with a

Table 4: Proposed Off-Street Parking – EIR Project and Modified Project Summary

Block	EIR Project	Modified Project
Subterranean Parking		
Block A	57 (including 3 ADA-compliant spaces)	57 (including 4 ADA-compliant spaces)
Block B	215 (including 9 ADA-compliant and 5 car-share spaces)	292 (including 9 ADA-compliant, and 3 car-share spaces)
Block C	120 (5 ADA-compliant spaces)	109 (including 5 ADA-compliant spaces)
Sub-total	***392***	***458***
Single-Family Residences Parking		
Two-Car Garage Parking Spaces	24	30
Total	**416**	**488**

bicycle repair station. Block B would provide 182 spaces, with a bicycle repair station on the first level of the parking garage. In addition, Block C would provide 16 spaces on the first level of the parking garage in a bike storage room. The modified project would also provide 30 Class 2 bicycle parking spaces, consisting of four spaces on Block A, 16 spaces on Block B, and 10 spaces on Block C.

STREETSCAPE AND CIRCULATION

As mentioned above, under the modified project there would be 66 on-street parking spaces along California, Maple, Sacramento, and Cherry streets compared with the 58 on-street parking spaces under the EIR project. The modified project would incorporate curb cuts for vehicular access along California, Cherry, Maple, and Sacramento streets (see Figures 4 through 6 [pp. 9–11] for curb cuts on each block). Some of the existing curb cuts on California, Cherry, Maple and Sacramento streets would be removed and new ones would be added.[5] In addition to adding new curb cuts along Sacramento, Maple, and Cherry streets, the modified project would reuse three existing curb cuts (two on California Street and one on Cherry Street), whereas the EIR project would reuse seven of the existing curb cuts. Overall, the modified project would result in a net increase in the number of curb cuts compared with existing conditions, with three added to the existing 16 curb cuts, four fewer than under the EIR project. The 11 single-family residences in Block B under the modified project would not be provided with individual curb cuts; instead, the parking garages would be accessible from a single shared curb cut and driveway along Cherry Street. In addition, the project sponsor is coordinating with the San Francisco Public Utilities Commission (SFPUC), Streetlight Services Division, to develop a lighting and signage plan for the proposed streetlights that would comply with Planning Code section 138.1 and the City and County of San Francisco's (City's) Better Streets Plan streetscape requirements.

[5] No new curb cuts would be added to California Street.

OPEN SPACE AND VEGETATION

Consistent with the EIR project, the modified project would include private open space areas that would be directly accessible from individual units as well as common open space areas that all project residents could access. Under the EIR project, a total of approximately 88,100 square feet of open space would be provided, consisting of 47,700 square feet of private open space and 40,400 square feet of common open space. Under the modified project, a total of approximately 70,700 square feet of open space would be provided, consisting of 20,900 square feet of private open space and 49,800 square feet of common open space. In addition, the modified project would include common roof deck areas for some of the buildings. The modified project would not include publicly accessible open space, consistent with the EIR project. Each single-family residence in Block A and Block B would have a private yard. Additional private open space areas would be distributed around the multi-family buildings. Common open space areas would be distributed throughout all three blocks and consist of landscaping and hardscaping within interior courtyards, plazas, lounges, rooftop decks, and terraces. Block A would include a common open space courtyard west of Building A1. Block B would be organized around a central courtyard that would create visual openness through the site and create a focal point for Commonwealth Avenue where it terminates at California Street. Block C would include a common open space courtyard on the third floor.

Like the EIR project, the modified project would lead to a net increase in the number of trees at and around the project site. The project site and surrounding public right-of-way currently contain 185 trees: 91 regulated[6] trees (77 street trees and 14 significant trees)[7] and 94 non-regulated trees. The EIR project would remove 65 of the existing regulated trees and plant 76 new street trees, resulting in a total of 102 regulated trees for the site vicinity. Of the non-regulated trees onsite, 84 would be removed and replaced with 144 new trees under the EIR project. Overall, the EIR project would increase the total number of trees onsite to 256 with the planting of 220 new trees. The modified project would remove 57 of the existing regulated trees and plant 65 new street trees, resulting in a total of 99 regulated trees for the site. Of the other 94 non-regulated trees onsite, 82 would be removed and replaced with 184 new trees. Overall, the modified project would increase the total number of street and onsite trees from 185 to 295 with the planting of 249 new trees.

PROPOSED INFRASTRUCTURE SYSTEMS

The modified project would include the same utility and infrastructure improvements as the EIR project. This would include realigning a portion of an existing 8-inch-diamater domestic water line in California Street in front of Block B, a portion of an existing 12-inch-diameter domestic water line in Maple Street in front of Block B, and a portion of an existing 6-inch-diameter domestic water line in Maple Street in front of Block C. New water connections would be provided to the proposed residential buildings, with each building separately metered at the sidewalk. Low-pressure water for firefighting purposes would be provided from four existing fire hydrants along California, Sacramento, and Cherry streets. Four new low-pressure fire

[6] Regulated trees are subject to requirements in the Urban Forestry Ordinance, *San Francisco Public Works Code, Section 800 et al*.

[7] *Significant trees* are trees of any species within 10 feet of the public right-of-way that are 12 inches in diameter, have a canopy spread of 15 feet, or are 20 feet tall.

hydrants would be installed along California and Sacramento streets. In addition, the project would include the installation of 4- to 12-inch-diameter sewer laterals to connect each of the proposed residential buildings to the gravity sewer lines under California, Sacramento, Cherry, and Maple streets.

Connections to the Pacific Gas and Electric (PG&E) grid would be provided for the new and renovated buildings. This would include the installation of new 0.75- to 2-inch-diameter natural gas lines that would connect to existing 4- and 6-inch-diameter high-pressure natural gas lines under California and Sacramento streets. New electrical lines and transformers would connect to the existing PG&E grid and serve buildings along California, Sacramento, and Cherry streets. The multi-family buildings could include central boilers.

The EIR project proposed to remove the existing three generators. A total of three new Tier 4 generators would be provided on the project site by the modified project along with the removal of the existing generators. The generators would be located on the roofs of Buildings B1, B2, and C1.

PROPOSED SUSTAINABILITY FEATURES

Consistent with the EIR project, the modified project would incorporate infrastructure and building features in compliance with green building requirements as well as the energy and water efficiency requirements in the San Francisco Green Building Code.[8] Each new dwelling would be equipped with efficient water features such as low-flow showerheads, kitchen and bathroom sink aerators, and low-flow toilets. Unlike the EIR project, under the modified project, the existing residential building at 401 Cherry Street would be retained in its existing condition and would not be renovated; efficient water fixtures, attic insulation, weather stripping, and heating insulation upgrades would not be installed. In addition, buildings within Blocks A, B, and C would achieve Leadership in Energy and Environmental Design (LEED) Gold certification. Furthermore, like the EIR project, landscaping under the modified project would be maintained in accordance with rules adopted by the SFPUC, which establish a water budget for outdoor water consumption. The roofs on all project buildings would be 15 percent solar, 30 percent living-roof material, or a combination of the two; common open spaces may include roof deck areas for some of the buildings. The modified project would provide for the storage, collection, and loading of recyclables, compost, and solid waste; receptacles would be located where convenient for all users of the buildings. All project construction and demolition material would be transported by a registered hauler to a registered facility to be processed for recycling. Stormwater would be managed onsite using low-impact design measures in accordance with the San Francisco Stormwater Management Ordinance.

TRANSPORTATION DEMAND MANAGEMENT PLAN

Similar to the EIR project, the modified project would be required to comply with Planning Code section 169, Transportation Demand Management Program. The project sponsor proposes amending the Transportation Demand Management (TDM) Plan that was adopted for the EIR project; a TDM Plan application was submitted to the planning department on April 1, 2024.

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[8] Consistent with the EIR project, the modified project would not be required to comply with the City's all-electric building code requirements under Building Code Section 106A.17, which applies to new buildings for which permits were filed after June 1, 2021. Because the modified project would use the previous building permit applications filed for the EIR project on December 22, 2019, the all-electric building requirements would not apply to the modified project.

Construction

SITE GRADING AND PREPARATION

Construction of the modified project would require up to approximately 33,600 cubic yards of excavation and up to approximately 60,000 cubic yards of ground disturbance, which would be less than the approximately 61,800 cubic yards of soil required to be excavated under the EIR project. Approximately 709,000 square feet of existing building area would be demolished and removed. Following demolition, the project site would be excavated and graded. Under the modified project, a total of approximately 60,000 cubic yards of soil across Blocks A, B, and C would be excavated, with approximately 26,400 cubic yards used as fill. The remaining approximately 33,600 cubic yards of soil would be hauled offsite under the modified project, whereas the EIR project would require approximately 61,800 cubic yards of soil to be hauled offsite.

FOUNDATIONS

Consistent with the EIR project, under the modified project, development on Blocks A and C would be constructed on a mat-supported pile foundation, while Block B would be constructed on a mat foundation.[9] However, to accommodate the foundations, the modified project would entail excavation to maximum depths of approximately 27 feet on Block A, approximately 36 feet on Block B, and approximately 22 feet on Block C instead of approximately 13 feet on Block A, approximately 75 feet on Block B, and approximately 17 feet on Block C under the EIR project.

CONSTRUCTION SCHEDULE

Construction of the modified project would occur over approximately three years and three months and consist of three distinct phases (by block), beginning with Block C and moving west, with overlapping construction phases similar to those of the EIR project. Construction is anticipated to begin in June 2026 and end in September 2029. Construction would generally occur on weekdays from 7 a.m. to 8 p.m., but up to seven days a week consistent with City regulations. The project does not propose nighttime construction work. However, the City and/or the project sponsor may determine that it is necessary to conduct nighttime construction work for activities within the public right-of-way or within the project site. In the event that nighttime construction work is necessary, it would be for only short-term activities, such as utility installation, roadway repaving, or other work. The staging of construction equipment would occur on the project site. If sidewalks are required for construction staging, pedestrian walkways would be constructed in the curb lanes.

Construction activities would include demolition of existing uses; site preparation, grading, excavation, building construction; and site finishing work. Under the EIR project, construction on Block C would begin first and occur over 29 months. Construction on Block B would occur over 35 months and would begin two months after the start of construction on Block C. Construction on Block A would occur over 23 months and would begin 15 months after the start of construction on Block B. In comparison, under the modified project, construction

[9] The multi-family buildings B1 and B2 are expected to utilize a mat foundation. Mat foundation is anticipated to be feasible also for the single-family homes in Block B, subject to confirmation with engineering analyses during the project's building permitting stage. Changes in the foundation type for the single-family homes would not affect the excavation depth.

would begin on Block C, which would occur over approximately 28 months. Construction on Block C the renovation of the Marshal Hale hospital building and demolition of the medical complex parking garage. Block B phase would commence two months after Block C construction start and would occur over approximately 34 months and overlap with the Block C phase for approximately 26 months. The Block B phase would include demolition of the hospital as well as the removal of all existing emergency generators. The Block A phase would start approximately 17 months and 15 months after start of construction on Blocks C and B, respectively, occur over approximately 22 months and include demolition of the medical office building and parking garage. It is anticipated that the Block A phase would overlap with the Block C phase for approximately 12 months and the Block B phase for approximately 20 months. It is anticipated that Block C would be operational in 2028, while Blocks B and A would be operational in 2029. Table 5 summarizes the construction schedule and excavation changes between the EIR project and the modified project.

Table 5: Proposed Construction Phasing and Excavation – EIR Project and Modified Project Summary

Block	EIR Project Phasing	EIR Project Excavation Depth	Modified Project Phasing	Modified Project Excavation Depth
Block C	29 months (2021–2023)	17 feet	29 months (June 2026–October 2028)	22 feet
Block B	35 months (2 months after Block C starts [2021–2024])	75 feet	34 months (2 months after C starts, August 2026–June 2029)	36 feet
Block A	23 months (15 months after Block C starts [2022–2024])	13 feet	22 months (17 months after C starts, November 2027–September 2029)	27 feet

Modified Project Approvals

SAN FRANCISCO PLANNING COMMISSION

- Adoption of findings of consistency with the San Francisco General Plan and priority policies of Planning Code section 101.1
- Conditional use authorization to permit development of buildings with respect to dwelling unit mix requirement (Planning Code section 207.7) and restaurant component (sections 231, 204.1 and 304[d][5]) as well as planned unit development approval, with exceptions to requirements for rear yard modifications (section 134), dwelling unit exposure (section 140), building front moderations (section 144.1), off-street freight loading (section 151.1), bulk limits (section 270), and publicly accessible restaurant feature (sections 231, 204.1 and 304[d][5])

- Approval of a TDM Plan (Planning Code section 169) to provide a strategy for managing the transportation demands created by the project
- Approval of a Streetscape Plan (Planning Code section 138.1)

SAN FRANCISCO BOARD OF SUPERVISORS

- Approval of general plan referral for subdivision and changes to public streets and sidewalks
- Approval of final subdivision map(s), including any dedications and easements for public improvements, and acceptance of public improvements, as necessary.
- Approval of the creation of the 3333/3700 California Streets Enhanced Infrastructure Financing District to provide for allocation of new property tax revenue for certain infrastructure and development activities, based on tax increment financing.

SAN FRANCISCO PUBLIC WORKS

- Approval of the merger of 13 existing parcels and the subsequent subdivision into 19 new parcels (not including the existing 401 Cherry Street parcel that will remain as is)
- If sidewalks are used for construction staging and pedestrian walkways are constructed in the curb lane(s), approval of a street space permit from the Bureau of Street Use and Mapping
- Approval of a permit to remove significant trees on privately owned property
- Approval of a permit to remove and plant street trees and partial waiver from Public Works Code section 806(d) to provide 41 fewer street trees than required
- Approval of construction within the public right-of-way (e.g., curb cuts, bulb-outs, sidewalk extensions, new crosswalk)
- Approval of an encroachment permit or a street improvement permit for streetscape improvements

SAN FRANCISCO DEPARTMENT OF BUILDING INSPECTION

- Review and approval of demolition, grading, and building permits

SAN FRANCISCO MUNICIPAL TRANSPORTATION AGENCY

- Approval of modifications to on-street loading and other colored curb zones
- Approval of a special traffic permit from the Sustainable Streets Division if sidewalks are used for construction staging and pedestrian walkways are constructed in the curb lane(s)
- Approval of the placement of bicycle racks in the public right-of-way

SAN FRANCISCO PUBLIC UTILITIES COMMISSION

- Approval of changes to connections to sewer system, as necessary
- Approval of erosion and sediment control plan for construction per Public Works Code article 4.1
- Approval of post-construction stormwater design guidelines, including a stormwater control plan that complies with the City's 2016 Stormwater Management Requirements and Design Guidelines
- Approval of changes to existing publicly owned fire hydrants, water service laterals, water meters, and/or water mains, as necessary
- Approval of the size and location of any new fire, standard, and/or irrigation water service laterals, as necessary
- Approval of construction permit for non-potable water system
- Approval of plumbing plans and documentation for non-potable water reuse system per the Non-potable Water Ordinance
- Approval of project landscape and irrigation plans per the Water Efficient Irrigation Ordinance and the SFPUC rules and regulations regarding water service to customers
- Approval of groundwater dewatering wells per San Francisco Health Code article 12B (Soil Boring and Well Regulation Ordinance) (joint approval with the San Francisco Department of Public Health)

SAN FRANCISCO DEPARTMENT OF PUBLIC HEALTH

- Approval of a site mitigation plan, in accordance with San Francisco Health Code article 22A (Maher Ordinance)
- Approval of a construction dust control plan, in accordance with San Francisco Health Code article 22B (Construction Dust Control Ordinance)
- Approval of design and engineering plans for a non-potable water reuse system and testing prior to issuance of a permit to operate
- Approval of groundwater dewatering wells (joint approval with the SFPUC)

ACTIONS BY OTHER AGENCIES

- Bay Area Air Quality Management District approval of any necessary air quality permits (e.g., authority to construct/permit to operate) for installation, operation, and testing of individual air pollution sources, such as boilers and generators

Project Setting

Blocks A–C

The project site is in the Presidio Heights neighborhood. The irregularly shaped 4.9-acre site comprises 14 parcels on one full city block as well as portions of two other blocks. The project site is bounded by Sacramento Street to the north, residential and some retail uses to the east, California Street to the south, and medical office and residential uses to the west. Cherry Street and Maple Street run north/south through the project site.

California Street is a major arterial street that connects to Van Ness Avenue/U.S. 101. The project site is accessible from transit (1-California, 2-Clement, and 33-Stanyan) and bike routes provided on the nearby Arguello, Cherry, Euclid and Clay streets. Existing bus stops are located on California and Sacramento streets adjacent to the project site.

Cumulative Development

California Environmental Quality Act (CEQA) Guidelines section 15130(b)(1)(A) defines cumulative projects as past, present, and probable future projects producing related or cumulative impacts. CEQA Guidelines section 15130(b)(1) provides two methods for cumulative impact analysis: the "list-based approach" and the "projections-based approach." The list-based approach uses a list of projects producing closely related impacts that could combine with those of a proposed project to evaluate whether a project would contribute to significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This project-specific CEQA analysis employs both the list-based and projections-based approaches to the cumulative impact analysis, depending on which approach best suits the resource topic being analyzed. The specific approach to the cumulative analysis is discussed in each topical subsection of this addendum. Table 6 includes the projects that have an application on file with the planning department or have an identified funding source (for public projects) that were considered as part of the cumulative analysis for the modified project.

Since completion of the 3700 California Street EIR, the cumulative context has largely remained unchanged, with 3641 California Street (Case No. 2018 007764ENV) being the only project constructed from the nearby development projects list. In addition, the added transportation projects listed below, although not included in the EIR project evaluation, are all nearby roadway improvements and do not substantially alter the cumulative setting.

Table 6: Cumulative Project List

Project	Description
Development Projects	
3333 California Street (Case No: 2015-014028ENV)	The 10.25-acre project site is currently developed with a four-story, 455,000-square-foot office building; a below-grade parking garage; a one-story annex building; three surface parking lots; two circular garage ramp structures; and landscaping. The existing office building would be partially demolished and expanded to include new levels. The mixed-use project would include the following uses, depending on the variant: 558 to 744 residential dwelling units in 15 buildings, 0 to 50,000 square feet of office space, 48,600 to 54,100 square feet of retail space, a 14,700-square-foot child care center, 895 to 971 parking spaces, and 236,000 square feet of open areas. Project first approved by planning department September 2019, with modification in October 2024; no active building permits issued.
3637–3657 Sacramento Street (Case No: 2007.1347E)	This project consists of demolition of three one- to three-story buildings and construction of a new 40-foot-tall, four-story mixed-use building containing 18 dwelling units, 6,500 square feet of retail use, 10,000 square feet of medical office use, and 64 vehicle parking spaces. Project first approved by planning department November 2018, with modification in April 2024; building permits issued.
Transportation and Infrastructure Projects	
Muni Forward[a]	Future Muni Forward efforts will continue making enhancements across the entire 1-California route. Outreach for the 1-California Muni Forward project is set to begin in 2025.
SFPUC Geary Boulevard Improvement	Replacement of utilities infrastructure on Geary Street from 14th Street to Stanyan Street.
Geary Boulevard Improvement Project[b]	The Geary-Boulevard Improvement Project will include the following: • Extension of transit-only lanes from Stanyan Street west to 34th Avenue. • Traffic signal priority for buses. • Reconfigured stop locations and upgraded transit stops from Stanyan Street to 34th Avenue, with transit bulb-outs, new amenities, and crossing improvements for people walking.
Arguello Safety Project	The project will review and potentially propose bikeways separated from motor vehicle traffic or protected bikeways. Protected bikeways are bicycle facilities that are separated from traffic by parked cars, safe-hit posts, transit islands, or other physical barriers. The addition of protective elements will increase safety for people bicycling on streets.

Source: San Francisco Planning Department, Property Information Map, https://sfplanninggis.org/PIM/, accessed April 4, 2025; and Fehr and Peers, *3700 California Transportation Assessment*, Case No. 2017-003559ENV-02, February 26, 2025.
Notes:
Based on information presented for these routes at https://www.sfmta.com/projects/muni-forward; accessed by Fehr & Peers, December 11, 2024.

a. The San Francisco Municipal Transportation Agency board approved the proposed street changes on August 15, 2023. More information about the project is available at https://www.sfmta.com/projects/geary-boulevard-improvement-project; accessed by Fehr & Peers, December 11, 2024.

Approach to and Analysis of Potential Environmental Effects

Approach

The proposed modifications to the EIR project are reevaluated in accordance with CEQA Guidelines section 21166 and CEQA Guidelines sections 15162–15163. When an EIR has been certified for a project, the guidelines state that no new, subsequent, or supplemental EIR shall be required unless one or more of the following events occurs: (1) substantial changes to a project are proposed that will require major revisions to the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) substantial changes will occur due to the circumstances under which the project is being undertaken, requiring major revisions to the previous EIR due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) new information of substantial importance, which was not known and could not have been known at the time the EIR was certified, has become available. In addition, San Francisco Administrative Code section 31.19(c)(1) states that a modified project must be reevaluated and that "if, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefor shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter."

CEQA Guidelines section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a subsequent final EIR for a project that is already adequately covered in a previously certified final EIR. An addendum to a certified final EIR may be prepared if some changes or additions are necessary, but none of the conditions described in section 15162 calling for preparation of a supplemental or subsequent final EIR have occurred. This addendum evaluates whether the environmental impacts of the modified project are addressed in the final EIR that was certified on February 27, 2020. As shown in the analysis below, the modified project, which is the subject of this addendum, would not result in new environmental impacts, substantially increase the severity of previously identified environmental impacts, or require new mitigation measures. In addition, no new information has emerged that would materially change the analyses or conclusions set forth in the final EIR. Therefore, as discussed in more detail below, the modified project would not change the analysis or conclusions reached in the final EIR.

Analysis

The final EIR evaluated the potential physical environmental impacts of the EIR project and found that implementation would result in project-specific significant environmental effects that could be mitigated to a less-than-significant level with implementation of mitigation measures. The project sponsor committed to a mitigation monitoring and reporting program, which was adopted as part of the conditions of approval for the EIR project. All applicable mitigation measures from the EIR project would be required for the modified project. In some cases, minor changes have been made to mitigation measures to reflect updates to best practices and available technology, resulting in a mitigation and monitoring program that is equally or more effective than the previous program. The revisions clarify, expand, or update the measures presented in the final EIR. The revised measures do not provide new information that would result in any new significant impact not already identified in the final EIR, or a substantial increase in the severity of an impact identified in the final EIR. The revised measures would not result in

a new significant impact, and the project sponsor has agreed to adopt a revised mitigation and monitoring program. Lastly, no new measures would be required to mitigate the significant impacts identified for the modified project in the final EIR.

This addendum evaluates the modified project with respect to the resource topics discussed in the EIR and its appended initial study. This addendum also documents the assessment and determination that the modified project is within the scope of the 3700 California Street EIR and confirms that no additional environmental review is required.

The following project-specific studies were prepared for the modified project to determine whether the project would result in any significant environmental impacts that were not identified in the 3700 California Street EIR: a transportation technical memorandum (Appendix A), an air quality technical analysis (Appendix B), an updated historic resources review (Appendix C).

Evaluation of Environmental Effects

Topics Addressed in the EIR

AESTHETICS AND PARKING IMPACTS

Section 4.1, *Introduction*, of the 3700 California Street EIR states the project is subject to California Public Resources Code section 21099(d), which eliminates consideration of impacts related to aesthetics and parking in determining the significance of physical environmental impacts under CEQA for residential, mixed-use residential, or employment-center projects on infill sites within transit priority areas.

Based on an updated eligibility checklist, the modified project meets the criteria listed in the Public Resources Code.[10] Therefore, as with the EIR project, the modified project's aesthetics and parking impacts would be exempt from determination of project impacts under CEQA.

TRANSPORTATION AND CIRCULATION

3700 California Street EIR Findings

Impacts on transportation and circulation were addressed in Section 4.2, *Transportation and Circulation*, of the 3700 California Street EIR, which determined that all transportation-related impacts would be less than significant. The EIR project would not result in a substantial increase in transit demand. Furthermore, it would provide a sufficient freight and passenger loading supply to meet project-generated demands. Average vehicle miles traveled (VMT) per capita for residential uses under the EIR project (i.e., VMT of 7.7 to 7.9) would be substantially lower than the significance threshold of 15 percent below the regional average of 14.6, resulting in a less-than-significant impact with respect to VMT. Furthermore, although impacts related to construction traffic and traffic hazards (i.e., queuing from automobiles) were determined to be less than significant, the EIR project would implement Improvement

[10] San Francisco Planning Department, *Eligibility Checklist: CEQA Section 1099 Modernization of Transportation Analysis for 3700 California Street*, February 25, 2025.

Measures I-TR-A, *Project Construction Updates*, and I-TR-B, *Monitoring and Abatement of Queues*, to further minimize the less than significant construction-related transportation impacts and automobile traffic impacts, respectively.

Modified Project Travel Demand Methodology and Results

The modified project's travel demand, trip distribution, and freight and passenger loading analysis is based on the City's 2019 Transportation Impact Analysis (TIA) Guidelines, which replaced the 2002 guidelines used in the 3700 California Street EIR. Travel demand for the proposed residential and restaurant uses under the modified project was estimated using the City's 2019 TIA Guidelines; proposed senior housing and institutional uses (i.e., assisted living) were estimated using the Institute of Transportation Engineers' *Trip Generation Handbook,* 11th edition.[11]

Table 7 provides the net change in vehicle trip generation between the EIR project and modified project, taking into account existing travel demand at the project site from hospital uses. As shown, net new vehicles generated by the modified project would increase daily vehicle trips by 524 and reduce PM peak-hour vehicle trips by 81. However, compared to trip generation from existing hospital uses, the modified project would reduce daily vehicle trips by approximately 4,349 and PM peak-hour vehicle trips by 448.

Table 7: Vehicle Trip Generation

Land Use	Quantity	Unit	Vehicle Trip Rates		Vehicle Trip Rates	
			Daily	PM Peak Hour	Daily	PM Peak Hour
EIR Project						
Project Vehicle Trips					1,389	240
CPMC Vehicle Trip Credit[a]					-6,262	-607
Net New Vehicle Trips					-4,873	-367
Modified Project						
General Residential	561[b]	Bedrooms	1.25	0.11	699	61
Senior Housing	158	Units	3.24	0.03	512	5
Institutional Housing	74[b]	Bedrooms	2.60	0.33	192	24
Restaurant (Composite)	4.81	1,000 square feet	106.03	14.35	510	69
Total Vehicle Trips					**1,913**	**159**
Net New Vehicle Trips (Modified Project — Existing CPMC Uses)					**-4,349**	**-448**
Difference (Modified Project — EIR Project)					**524**	**-81**

Notes:
Source: Fehr and Peers, *3700 California Transportation Assessment, Case No. 2017-003559ENV-02*, February 26, 2025.

a. Existing uses on the project site at the time of the 3700 California Street notice of preparation were applied as a credit for project trip generation, consistent with the EIR analysis. Existing trip credits were subtracted from project total trips to get net new total trips.

b. Calculated by multiplying the number of units by the number of bedrooms in the category (i.e., studio/1-bedroom unit = multiplier of 1; 2-bedroom unit = multiplier of 2; 3-bedroom or more = multiplier of 3).

[11] For additional details regarding the modified project's transportation analysis methodology, please refer to Appendix A, *3700 California Transportation Assessment, Case No. 2017-003559ENV-02*.

Modified Project Impacts

Construction Impacts

Construction activities under the modified project would be similar to those under the EIR project. Specifically, construction activities under the modified project would take place over a period of approximately 35 to 40 months. As detailed under the *Proposed Modifications to EIR Project* subsection, construction activities associated with the modified project would comply with San Francisco Noise Ordinance and Department of Building Inspection permit provisions. Construction would generally occur on weekdays from 7 a.m. to 8 p.m., but could occur up to seven days a week consistent with City regulations. The number of daily trucks and construction workers for the modified project would be similar to the numbers under the EIR project. Hauling and construction truck routes and staging areas would be the same as under the EIR project. Similar to the EIR project, the modified project would have temporary construction-related transportation impacts related to street closures, route changes, and temporary bus stop relocations. The modified project would follow applicable public works codes and orders to maintain safe access in and around the construction site as well as the San Francisco Municipal Transportation Agency's (SFMTA's) *San Francisco Regulations for Working in San Francisco Streets* (also known as the Blue Book). The project sponsor would also be required to reimburse SFMTA for the installation and removal of temporary striping and changes to signage required during project construction. Therefore, with compliance with existing City regulations, construction activities under the modified project would result in a less-than-significant impact, and no mitigation measures are required. Consistent with the EIR project, the modified project would implement Improvement Measure I-TR-A to further minimize construction-related transportation impacts.

Operational Impacts

Vehicle Miles Traveled (VMT): The modified project would generate an average VMT per capita of 7.8 for residential uses and a VMT per capita of 9.39 for the restaurant uses, which would be substantially lower than 15 percent below the regional average. The project parking rate is higher than the neighborhood parking rate but would not increase site level VMT to greater than 15% below the existing regional average daily VMT per capita and/or employee. Further, the project parking ratio would be in compliance with planning code requirements.[12] No vehicle parking would be provided for the proposed restaurant uses. Therefore, consistent with the EIR project, the modified project would also have less-than-significant impacts related to VMT, and no mitigation measures are required.

Potentially Hazardous Conditions and Accessibility: The modified project would result in approximately 81 fewer PM peak-hour trips than the EIR project and 448 fewer PM peak-hour trips than existing hospital uses. Although the modified project would result in an increase in daily trips compared to the EIR project (i.e., 524 additional daily trips), the modified project would generate 4,349 fewer daily trips than existing hospital uses. In addition, the modified project would provide adequate driveway lengths with off-street storage space, which would avoid

[12] Per City requirements, the residential parking rate is 0.66 and the non-residential parking rate is 0.59 for TAZ 322 and 323. The modified project would provide a parking ratio of 0.96. Refer to the San Francisco Transportation Information Map for more information: *San Francisco Transportation Information Map*.

queueing on adjacent streets. The driveway locations would be nearly identical to those under the EIR project, with the exception of the driveway on Maple Street, which would move north approximately 100 feet but remains 80 feet from the nearest intersection. This driveway would be free of visual obstructions, and maintains an adequate sight distance from the corner.[13] Furthermore, the modified project would require fewer curb cuts and remove a curb cut along the busiest street (California Street), thereby reducing the number of conflict points between people driving and walking, bicycling, or riding transit in the project vicinity. Therefore, the modified project would result in less-than-significant impacts related to potentially hazardous conditions and accessibility, and no mitigation measures are required. Consistent with the EIR project, the modified project would implement Improvement Measure I-TR-B, *Monitoring and Abatement of Queues*, to further minimize impacts with respect to automobile traffic in the project vicinity.

Public Transit: The modified project would result in approximately 81 fewer PM peak-hour vehicle trips compared to the EIR project, or approximately 199 PM peak-hour person trips. As outlined in the 2019 TIA Guidelines, projects that generate fewer than 300 PM peak-hour vehicle trips have a less-than-significant impact on transit delay. Because the modified project would meet this criterion, consistent with the EIR project, the modified project would result in a less-than-significant impact on transit delay, and no mitigation is required.

Loading: Consistent with the EIR project, the modified project would provide an adequate freight and passenger loading supply to meet project-generated demand. The modified project would generate a peak-hour freight loading demand requiring three freight loading spaces. Because the modified project would provide a total of five freight loading spaces, one in each multi-family building (A1, B1, and B2) and two in the senior housing/institutional uses building (C1), the modified project would meet the loading demand. In addition, the modified project would generate a demand for at least six passenger loading spaces during the peak PM period. However, the modified project would provide nine passenger loading zones along project site frontages as well as a porte-cochere in Block C for onsite passenger loading. Therefore, consistent with the EIR project, the modified project would also have less-than-significant impacts related to freight and passenger loading, and no mitigation measures are required.

Cumulative Impacts

The 3700 California Street EIR determined that the project in combination with cumulative projects would not result in significant cumulative transportation impacts. The 3700 California Street EIR determined that cumulative transportation impacts related to construction, traffic hazards, and transit would be less than significant. It also concluded that there would be no cumulative impacts related to parking, emergency access, loading, bicycling, walking/accessibility, or VMT. The cumulative context and conditions for the modified project (Table 6) would remain similar to that identified for the EIR project. As addressed in the analysis above, the modified project's construction activities would be similar to those of the EIR project and the cumulative setting has not resulted in an increase of nearby cumulative projects relative to the EIR project and nearby construction activities. Construction activities under the modified project and cumulative projects, would require compliance with existing City regulations, would result in less-than-significant cumulative transportation construction

[13] Assembly Bill 413 (the "Daylighting Law") prohibits on-street parking within 20 feet of any intersection or crosswalk.

impacts, consistent with the EIR project. Cumulative projects in the immediate vicinity of the modified project are not anticipated to result in substantial changes to traffic circulation or include design features that could lead to potentially hazardous conditions for people walking, bicycling, driving, or riding transit. Although the modified project would result in a greater number of daily vehicle trips compared with the EIR project, the daily vehicle trips would still be lower than existing trips. It would also result in fewer PM peak-hour vehicle trips compared with the EIR project and provide adequate driveway and garage ramp storage space. Therefore, it would not result in onsite vehicle queues that would extend into the public right-of-way. As such, the modified project would also result in less-than-significant cumulative impacts related to hazardous conditions and accessibility, consistent with the EIR project. There would be no cumulative impact related to loading under the modified project because there would be no additional cumulative projects in the immediate vicinity of the project site that could generate overlapping passenger or freight loading demand on adjacent streets. The 3700 California Street EIR concluded the EIR project would not combine with other projects to result in cumulative impacts on regional transit capacity. Because the modified project would generate fewer PM peak-hour vehicle trips than the EIR project and be below the screening criteria from the City's 2019 TIA Guidelines for projects that typically do not result in significant public transit delay compared to existing conditions (i.e., fewer than 300 PM peak-hour vehicle trips), the modified project would result in a less-than-significant impact related to transit delay and would not combine with other cumulative projects to result in significant cumulative transit delay impacts. Furthermore, under cumulative conditions, the modified project's residential VMT per capita of 7.31 would be less than the threshold criteria of 15 percent below the regional average for VMT per capita of 14.5. The modified project's proposed restaurant uses under cumulative conditions would have a VMT per capita of 8.43 and, which is also below the threshold of 15 percent below the regional average for VMT per capita of 13.3. Therefore, the modified project would have no cumulative impact on VMT.

Conclusion

In summary, the modified project would not result in new significant transportation and circulation impacts at either the project or cumulative level that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures or changes to the existing improvement measure are required.

NOISE

3700 California Street EIR Findings

Section 4.3, *Noise*, of the EIR addressed the noise and vibration effects of the EIR project. The nearest sensitive land uses are residences located on the south side of Sacramento Street, both east and west of the project site, within approximately 25 feet of the project site. Given the proximity of sensitive receptors, the analysis determined that construction of the EIR project would result in significant but mitigable project and cumulative impacts related to an increase in ambient noise and ground-borne vibration/noise, with all operational noise impacts being less than significant. Specifically, analysis of construction noise impacts of the EIR project resulted in more than a 10-decibel (dB) increase in ambient noise at nearby sensitive receptors, and construction noise levels that would, at times, be in excess of 90 dBA at nearby sensitive uses. Temporary construction noise

impacts during daytime hours were determined to be significant. Implementation of Mitigation Measure M-NO-1, *Construction Noise Control*, requires measures pertaining to equipment maintenance and requirements for improved mufflers, engine enclosures, and acoustically attenuating shields, which would reduce the impact of the EIR project related to daytime construction noise to a less-than-significant level.[14] Because construction of the EIR project would use heavy equipment, such as a large bulldozer, project construction activities could generate ground-borne vibration that would be perceptible at nearby sensitive uses or structures. The EIR determined that the predicted vibration levels would result in less-than-significant vibration-related sleep disturbance impacts because of the relatively low vibration levels from the types of equipment proposed for use during nighttime hours. The EIR determined that construction of the EIR project would not result in vibration levels that would exceed the applicable damage thresholds for adjacent and nearby structures; vibration-related damage impacts were therefore determined to be less than significant. However, the EIR determined that construction of the EIR project adjacent to a medical building (3838 California Street) could interfere with the operation of nearby vibration-sensitive equipment and result in a significant vibration impact. Mitigation Measure M-NO-2, *Vibration Sensitive Equipment at 3838 California Street*, includes measures to ensure that vibration-sensitive equipment is not negatively affected during construction, reducing the EIR impact to less than significant with mitigation.

Operation of the EIR project would generate noise related to resident and employee vehicle trips and the operation of fixed mechanical equipment. Although the EIR project would result in an overall reduction in the number of daily trips, the EIR project is estimated to result in an increase in traffic volumes of up to 18 percent on five road segments compared with existing conditions. However, this increase falls below the doubling of the traffic volume needed (i.e., a 100 percent increase) to result in a barely noticeable (3 dB) change in traffic noise; thus, traffic noise impacts associated with the EIR project would be less than significant.

Operation of the EIR project would require new heating, ventilation, and air-conditioning (HVAC) equipment, which would be subject to section 2909 of the noise ordinance and require the EIR project to meet noise standards at the property line. Therefore, The EIR project would not result in a significant permanent increase in ambient noise.

To further reduce the less-than-significant operational noise impact, the EIR project would implement Improvement Measure I-NO-A, *Stationary Equipment Noise Controls.*

Modified Project Impacts

Construction Noise: The modified project would be located in the same location as the EIR project, with the same maximum building heights as under the EIR project, and a building perimeter similarly extending to parcel boundaries. The modified project would include demolition of five of the six hospital buildings on the project site, adaptive reuse and expansion of the Marshal Hale hospital building at 3698 California Street for residential and institutional uses, retention of the nine-unit residential building at 401 Cherry Street, and construction of 19 new residential buildings. The construction equipment list provided for the modified project includes the same general mix of equipment planned for use under the EIR project. Because construction activities for the modified

[14] Note that impacts associated with nighttime construction were determined to be less than significant, without mitigation required.

project would occur in the same areas as for the EIR project, and because the types of construction activities and the construction equipment proposed for use would also be the same, the construction noise analysis for the EIR project would apply to the modified project.

The daytime construction noise analysis in the 3700 California Street EIR evaluated noise from the two loudest pieces of equipment at sensitive receptor locations to determine if construction noise would exceed 90 A-weighted decibels (dBA) or be 10 dBA above the ambient noise level. Worst-case combined construction noise levels were estimated to be 91 dBA at 25 feet during the worst-case nosiest construction phases, as shown in Table 4.3-14 of the EIR for the EIR project), which is 1 dBA above the 90 dBA criterion. An exceedance of the 90 dBA FTA criteria would be potentially significant. Mitigation Measure M-NO-1 would reduce this impact to less than significant and was required for the EIR Project. Regarding the potential for a 10 dB increase over the ambient noise level to result from project construction, combined project construction noise levels for the EIR project were compared to the 13-hour equivalent continuous sound level (L_{eq})[15] in the project area, which ranged from approximately 66 to 71 dBA. The EIR concluded that worst-case combined construction noise levels, ranging from 87 to 91 dBA at a distance of 25 feet and 81 to 85 dBA at a distance of 50 feet, could increase background noise levels at a sensitive use by more than 10 dBA. The worst-case analysis determined that noise levels could increase by up to approximately 25 dB during construction (at a receptor located 25 feet from construction) and that even sensitive receptors located at distances of up to 100 feet from construction activity could be exposed to a noise increase of 10 dBA or more. Because nearly all activities would result in noise levels of 10 dBA or more than existing noise levels near the closest ambient measurement (LT-2, measured to be 65.9 dBA), this impact was considered to be significant for the EIR project. Mitigation Measure M-NO-1 would reduce this impact to less than significant and was required for the EIR Project. Therefore, this impact was determined to be less than significant with mitigation.

As mentioned previously, construction areas for the modified project would be the same as those for the EIR project, and the types of construction activities and the equipment proposed for use would also be the same. As a result, the construction analysis for the EIR project would apply to the modified project. Therefore, as for the EIR Project, sensitive receptors within 100 feet of construction activity associated with the modified project could be exposed to a noise increase greater than 10 dBA for a duration that could be considered excessive. The modified project construction is estimated to take a total of three years and three months. This impact is therefore considered to be significant for the modified project, as was the case with the EIR project. Implementation of EIR project Mitigation Measure M-NO-1 would also apply to the modified project and would reduce daytime construction noise resulting from the modified project. As was the case with the EIR project, implementation of Mitigation Measure M-NO-1 would reduce daytime construction noise impacts from the modified project to a less-than-significant level.

Nighttime construction activities associated with the modified project would be the same as proposed under the EIR project. As was the case with the EIR project, the majority of construction activities associated with the modified project would occur during daytime hours, with only limited construction potentially occurring outside

[15] A 13-hour L_{eq} was calculated using the long-term measurement data in the 3700 California Street EIR to compare construction noise levels. Article 29 of the Police Code permits construction to occur between 7 a.m. and 8 p.m. (i.e., 13 hours); therefore, an L_{eq} noise level has been calculated using the hourly noise level measurement data for the hours between 7 a.m. and 8 p.m. for a direct comparison to the permitted construction hours.

of the permitted hours of 7 a.m. to 8 p.m. to minimize traffic disruptions along the public right-of-way, should the City determine it to be necessary. In the event that nighttime construction work is necessary for the modified project, it would be for minor, short-term activities such as utility installation, roadway repaving or other work. These types of activities generate noise that would be less severe than noise from the activities that would occur during regular construction hours, such as demolition or grading. As stated in the EIR, the duration of nighttime work would be short, and the severity of any resulting noise would be anticipated to be substantially less than that from daytime construction work. Therefore, as was concluded in the EIR, nighttime construction noise impacts associated with the modified project would be less than significant.

Construction Vibration: As was the case with the EIR project, construction of the modified project would also not require the use of any impact equipment, such as pile drivers; however, construction would require the use of heavy equipment that could generate temporary ground-borne vibration. Because the construction areas and equipment proposed for use for the modified project would be the same as those for the EIR project (with the most vibration-intensive equipment proposed for use being a large bulldozer or excavator and an auger drill), the construction vibration analysis for the EIR project would apply to the modified project.

As noted above, the 3700 California Street EIR determined that sleep disturbance from construction vibration would not be expected because of the relatively low vibration levels from the types of equipment proposed for use and because nighttime construction (if it were to occur) would include minor activities with less potential for ground-borne vibration. For these reasons, construction activities were determined to result in less-than-significant vibration-related sleep disturbance impacts. Because the potential for nighttime construction under the modified project would be the same as under the EIR project, and because the equipment proposed for nighttime use would also be the same, the same conclusion would apply to the modified project. Vibration impacts related to nighttime sleep disturbance would be less than significant for the modified project.

With respect to building damage, the 3700 California Street EIR stated the applicable damage thresholds for adjacent and nearby structures would not be exceeded by construction activities. This impact was determined to be less than significant for the EIR project. Because the modified project would require the use of the same equipment as the EIR project, and because the overall footprint of construction for the modified project would also be the same as the footprint of construction for the EIR project, the conclusion for the EIR project would apply to the modified project. Vibration impacts related to building damage would be less than significant for the modified project.

Regarding the potential for interference with vibration-sensitive equipment, the 3700 California Street EIR stated that a building at the project site that would be demolished is directly adjacent to an existing medical office building at 3838 California Avenue that could contain vibration-sensitive equipment for medical uses (e.g., optical microscopes, cell probing devices, scanning electron microscopes). The 3700 California Street EIR stated that demolition of the onsite existing building could result in an exceedance of the Category 1 Federal Transit Administration (FTA) threshold of 65 VdB at distances of up to 135 feet; the adjacent medical office would be within 135 feet of project construction areas. Therefore, the EIR determined that interference with the operation of nearby vibration-sensitive equipment could occur as a result of EIR project construction. This impact was

determined to be significant. Mitigation Measure M-NO-2 would reduce this impact to a less-than-significant level. Because the construction areas for the modified project would be the same as those for the EIR project, and because the construction equipment proposed for use would be the same, the construction vibration analysis for the EIR project would apply to the modified project. Therefore, the modified project would also have a potentially significant impact related to interference with vibration-sensitive equipment at the adjacent medical office. Mitigation Measure M-NO-2 would be required for the modified project and would reduce vibration impacts from the modified project on sensitive equipment at the adjacent medical office building to a less-than-significant level.

Operational Equipment Noise: Stationary mechanical equipment associated with the EIR project included rooftop HVAC equipment. The modified project would include similar rooftop HVAC equipment. In addition, three stationary emergency generators are located on the project site at the existing hospital use; however, unlike the EIR project, the modified project proposes up to three generators on the roofs of Buildings B1, B2, and C1.

The EIR project proposed removing and replacing existing stationary HVAC equipment with new HVAC systems that would comply with the noise ordinance. Because HVAC equipment associated with the EIR project would replace similar equipment on existing buildings, and because the equipment would be required to comply with the noise ordinance, the EIR project's HVAC systems were not expected to result in significant permanent increases in ambient noise levels; this impact was determined to be less than significant. To further reduce the less-than-significant operational noise impact, the project sponsor for the EIR project agreed to implement Improvement Measure I-NO-A, which includes shielding or enclosing HVAC equipment, locating equipment further from sensitive uses, etc.) that would further reduce noise from project equipment operation. Operational mechanical equipment for the modified project would be similar to the equipment proposed under the EIR project—and similar to the existing equipment at the project site. Specifically, the equipment would consist primarily of only roof-mounted HVAC units, as was the case for the EIR project. Because HVAC equipment associated with the modified project would replace similar equipment on the existing buildings, and because the equipment would be required to comply with the noise ordinance, the modified project's HVAC systems would also not be expected to result in significant permanent increases in ambient noise levels. In addition, implementation of Improvement Measure I-NO-A, which would include the use of noise-reducing measures (e.g., shielding or enclosing equipment, locating equipment further from sensitive uses, etc.) would further reduce HVAC noise levels that comply with applicable local noise limits.

Although the EIR project did not propose the use of any emergency generators, the modified project includes the potential for up to three emergency generators; these would each be located on the roof of separate project buildings and would not be sited adjacent to one another. Three emergency generators are currently associated with the existing hospital use on the site. Thus, the emergency generators included in the modified project would not represent a change to existing noise conditions. Furthermore, emergency generator testing occurs infrequently (e.g., 30 minutes once or twice per month, typically during daytime hours). Because of the infrequent nature of emergency generator testing, and because the existing use on the site currently has the same number of generators as proposed under the modified project, new emergency generator testing would not be expected to result in significant noise impacts.

The modified project would result in operational noise impacts similar to those disclosed in the 3700 California Street EIR. Improvement Measure I-NO-A would be required for the modified project, as was the case for the EIR project, further ensuring that equipment noise levels would be in compliance with applicable noise limits. As was the case for the EIR project, operational equipment noise impacts associated with the modified project would be considered less than significant. Implementation of the improvement measure would further reduce the less than significant noise impact due to rooftop HVAC equipment.

Traffic Noise: With respect to project-generated vehicle trips, the EIR project would generate approximately 1,389 daily vehicle trips and 240 PM peak-hour vehicle trips, whereas the modified project would generate 1,913 daily vehicle trips and 159 PM peak-hour vehicle trips. The modified project's land uses, as well as the application of the newer trip generation rates, would result in an increase in daily vehicle trips (i.e., 524 additional daily vehicle trips) and a reduction in PM peak-hour vehicle trips (i.e., 81 fewer vehicle trips) compared to the EIR project. However, when compared to trip generation for existing hospital uses, the modified project would result in a net reduction in daily vehicle trips and PM peak-hour vehicle trips (i.e., 4,349 fewer daily vehicle trips and 448 fewer PM peak-hour vehicle trips).

According to the 3700 California Street EIR, the EIR project was estimated to result in an up to 18 percent increase in traffic volumes compared with existing conditions (as shown in Table 4.3-15 of the EIR), which is well below the doubling of the traffic volume needed (i.e., a 100 percent increase) to result in a barely noticeable change in traffic noise.[16] Consequently, the project-related traffic increase associated with the EIR project was determined to not result in a substantial increase in noise. Traffic noise impacts were found to be less than significant.

As shown in Table 4.3-15 of the 3700 California Street EIR, the up to 18 percent increase (i.e., the largest increase) in project-generated traffic was expected to occur along Maple Street north of California Street; this increase was associated with an increase in daily trips (i.e., 330 additional daily trips on this street segment). The modified project has the potential to increase daily traffic trips by up to 524 compared with the EIR project. It is conservatively assumed these modified project trips could occur on all roadway segments in the vicinity of the project. Therefore, to provide a worst-case traffic noise analysis, these 524 trips are added to the most affected roadway segment (Maple Street north of California Street) from the EIR project analysis. Adding 524 net new modified project trips to the 330 EIR project trips along this segment of Maple Street would result in an estimated 854 daily project vehicle trips along this segment under the modified project. According to the EIR, the existing daily traffic volume on this segment amounted to 1,800 vehicle trips. The 854 project trips potentially added along this most-affected segment under the modified project would constitute a 47 percent increase compared with existing conditions. Because the percent increase along this segment (which was the most impacted segment in the EIR analysis) is still below the doubling of the traffic volume needed (i.e., a 100 percent increase) to result in a barely noticeable 3 dB change in traffic noise, the modified project would also not be expected to result in a significant traffic noise impact. As was the case with the EIR project, traffic noise impacts would be less than significant under the modified project.

[16] Note that a change in noise of 3 dBA is generally considered to be barely noticeable to the average human ear.

Cumulative Impacts

The 3700 California Street EIR evaluated cumulative impacts related to construction noise. It determined that the construction of nearby cumulative projects could occur concurrently with project construction activities and that the EIR project could result in a significant contribution to the cumulative noise impact. With implementation of Mitigation Measure M-NO-1, the EIR project's contribution to cumulative noise impacts would be reduced to a less-than-significant level through the requirement to implement noise control measures and a noise control plan in response to noise complaints from nearby residents. As discussed above, the modified project's construction activities would be similar to those of the EIR project. Therefore, the cumulative noise impacts related to modified project construction activities would also be less than significant with mitigation.

The 3700 California Street EIR also evaluated cumulative impacts related to construction vibration and determined that vibration effects from project construction would be unlikely to combine with vibration effects from nearby construction projects and result in greater overall vibration levels at any receptor. Therefore, cumulative vibration impacts related to the EIR project were determined to be less than significant. Because the modified project's construction activities would be similar to those of the EIR project, cumulative construction-related vibration impacts would also be less than significant.

The potential for cumulative operational noise impacts was also evaluated in the 3700 Street EIR. Because stationary equipment at the EIR project site and other new developments (i.e., for cumulative projects) would be required to comply with the noise ordinance, it was determined that stationary-source operational noise impacts would be less than significant. The same less-than-significant conclusion for cumulative impacts related to stationary sources of operational noise would apply to the modified project.

Cumulative traffic noise impacts were determined to be less than significant for the EIR project because cumulative, including project, traffic volumes were estimated to result in a maximum vehicle trip increase of 38 percent on a worst-case segment (compared to existing conditions). A 38 percent increase would be below the level needed to produce a 3 dB increase, which is a barely noticeable change in traffic noise (i.e., a doubling of the traffic volume, or a 100 percent increase). Consequently, cumulative traffic noise impacts were determined to be less than significant for the EIR project. The modified project would be located at the same site analyzed in the EIR. No additional cumulative projects are proposed in the immediate vicinity. Therefore, cumulative traffic noise impacts under the modified project would be similar to those disclosed in the 3700 California Street EIR and less than significant.

Conclusion

In summary, the modified project would not result in new significant noise and vibration impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures or changes to existing noise and vibration mitigation are required.

AIR QUALITY

3700 California Street EIR Findings

Section 4.4, *Air Quality*, of the 3700 California Street EIR addressed the air quality effects of the EIR project. Emissions generated from the EIR project during simultaneous construction and operation were found to not exceed average daily or annual thresholds for reactive organic gases (ROGs), nitrogen oxides (NO_x), particulate matter 10 microns in diameter or less (PM_{10}), or particulate matter 2.5 microns in diameter or less ($PM_{2.5}$), and construction and operational air quality impacts were determined to be less than significant. Specifically, with respect to fugitive dust and criteria pollutants during construction, the EIR project would generate fugitive dust and exhaust, but it would not contribute substantially to an existing or projected air quality violation or result in a cumulatively considerable net increase in criteria air pollutants. The EIR project would be subject to dust control measures, in compliance with the regulations and procedures set forth by San Francisco's Construction Dust Control Ordinance, ensuring that the potential dust-related construction air quality impacts of the EIR project would be less than significant. Thus, the 3700 California Street EIR determined that project construction would result in a less-than-significant criteria air pollutant impact. During operations, at full buildout, emissions generated by the EIR project would be less than those generated by existing uses, because several sources of emissions that are associated with the existing uses would be removed. These include area sources, energy use, on-road vehicle travel, and emergency generator use at the existing hospital uses. These existing sources were determined to result in a greater magnitude of emissions than the emissions associated with the EIR project. The EIR project would thus result in net negative emissions relative to existing uses and would not result in emissions of criteria air pollutants at levels that would violate an air quality standard or result in a cumulatively considerable net increase in criteria air pollutants. The EIR concluded there would be no impact.

With respect to the generation of toxic air contaminants, the analysis determined that construction and operation of the EIR project would result in significant but mitigable project- and cumulative-level impacts related to the generation of diesel particulate matter (DPM). The 3700 California Street EIR found that construction and operation of the project would generate toxic air contaminants, including DPM, at levels that would expose sensitive receptors to substantial pollutant concentrations. The EIR project's cancer risk contribution would be 36.9 in 1 million at offsite receptors, which is above both the 7 in 1 million significance criterion for receptors in an Air Pollution Exposure Zone (APEZ) and the 10 in 1 million significance criterion for receptors outside an APEZ. To address the EIR project's significant cancer risk impact with the updated background cancer risk values provided in the draft updated Citywide Health Risk Assessment database, Mitigation Measure M-AQ-3, *Construction Emissions Minimization*, would require the use of lower-emitting construction equipment and therefore would not result in any new significant environmental impacts. Mitigation Measure M-AQ-3 would reduce the EIR project's contribution to the cancer risk to 6.1 in 1 million, which is below the 7 in 1 million significance criterion. Therefore, with implementation of Mitigation Measure M-AQ-3, the EIR project would result in a less-than-significant health risk impact.

The EIR project would support the goals of the 2017 Bay Area Clean Air Plan because it would result in a net decrease in emissions compared with existing conditions. Because the EIR project would be consistent with the applicable air quality plan, the impact would be less than significant.

Modified Project Methodology and Impacts

As detailed under *Proposed Modification to the EIR Project*, the modified project involves an increase in interior square footage and an increase in the number of residential units relative to the EIR project. In addition, the modified project provides a new memory-care use but, overall, maintains the same footprint as the EIR project. It also would have a later construction start and end date and less excavation-related activity due to the lower depths for Blocks C. Table 3, p. 19, includes a detailed breakdown of the modified project changes, and Table 5, p. 28, presents the construction timing and changes in excavation depths.

This analysis relies on the air quality technical analysis memorandum (Appendix B, air quality analysis)[17]. Overall, the methods used in the 3700 California Street EIR remain consistent with the methods used for the analysis of the modified project, except as noted below due to updated emission factors and/or updates to the CEQA air quality guidance and recommendations. Additional details and tables related to the analysis that follows are found in the aforementioned appendix.

Fugitive Dust Criteria Air Pollutants: With respect to construction-related fugitive dust impacts, the modified project would be subject to the same dust control measures as outlined in the 3700 California Street EIR. Consistent with the EIR project, compliance with the regulations and procedures set forth by the Construction Dust Control Ordinance would ensure that the potential dust-related construction air quality impacts of the modified project would also be less than significant.

With respect to construction criteria air pollutants impacts, the air quality analysis[18] relied on the modified project's updated construction schedule, equipment list, and construction trips to calculate criteria air pollutant emissions from project construction. Appendix B presents the methods used to calculate emissions. With the changes under modified project, average daily criteria air pollutant emissions from construction, as shown in Table 8 in pounds per day, would be 47 for ROGs, 14 for NO_X, 0.21 for PM_{10}, and 0.21 for $PM_{2.5}$. Given these findings, unmitigated construction emissions associated with the modified project would be below the respective Bay Area Air Quality Management District thresholds of significance for all criteria pollutants. When compared to the 3700 California Street EIR, daily ROG emissions increased slightly from 40 pounds per day to 47 pounds per day due to the increase in the use of architectural coatings. All other criteria air pollutants decreased by 44 to 83 percent. Thus, the modified project would result in a similar less-than-significant impact related to construction emissions of criteria pollutants.

With respect to operational criteria air pollutants, compared to the 3700 California Street EIR, operation of the modified project would result in an increase in the total daily VMT from 5,494 miles to 10,503 miles and introduce a new source of emissions from the three proposed generators. Based on the air quality analysis,[19] which considers these project changes, the modified project would result in slightly greater operational criteria air

[17] Ramboll. 2025. *Air Quality CEQA Analysis Results 3700 California Street Project, San Francisco, CA.* February 26.

[18] Ibid.

[19] Ramboll. 2025. *Air Quality CEQA Analysis Results 3700 California Street Project, San Francisco, CA.* February 26.

Table 8: Summary of Maximum Annual Average Daily Criteria Air Pollutants Emissions

Emissions Source	Average Daily Emissions from Operation and Construction (lb/day)			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Construction + Operations[a]				
Existing Hospital Use	-32	-48	-28	-9.0
EIR Project – Construction + Operations (worst-case)	45	25	4.3	1.4
EIR Project – Net Emissions[b] (worst-case)	**13**	**-24**	**-24**	**-7.6**
Modified Project – Construction + Operations (worst-case)	58	14	8	2
Modified Project – Net Emissions[b]	**26**	**-34**	**-20**	**-7**
Significance Threshold	*54*	*54*	*82*	*54*
Modified Project above Threshold?	No	No	No	No
Operations (Full Buildout)[c]				
Existing Hospital Use	-32	-48	-28	-9.0
EIR Project – Operations	18	3.8	4.2	1.3
EIR Project – Net Emissions[b]	**-14**	**-43**	**-22**	**-7.3**
Modified Project – Operations	21	5.5	7.6	2.1
Modified Project – Net Emissions[b]	**-10**	**-43**	**-21**	**-6.9**
Significance Threshold	*54*	*54*	*82*	*54*
Modified Project Above Threshold?	No	No	No	No

Source (modified project emissions): Ramboll. 2025 *Air Quality CEQA Analysis Results 3700 California Street Project, San Francisco, CA.* February 26, Tables A, B, VI, XI, XII, and XIII, and 3700 California Street EIR.

Notes:

a. Emissions for the existing hospital use and EIR project construction and operational emissions are from Table 4.4-6 in the 3700 California Street EIR. The EIR project emissions shown here are the maximum values for construction and operations overlap for each pollutant and represent multiple construction years.

b. There may be minor differences between the net emissions and the sum of the individual rows due to rounding differences.

c. Emissions for the existing hospital use and EIR project are from Table 4.4 7 in the 3700 California Street EIR.

pollutant emissions than those calculated for the EIR project. Like the EIR project, the modified project would result in fewer emissions compared with the baseline emissions that occurred at the time the notice of preparation was prepared, because several sources of emissions that are associated with the existing uses would be removed, including area sources, energy use, on-road vehicle travel, and emergency generator use at the existing hospital uses. These existing sources result in a greater magnitude of emissions than the emissions associated with the modified project, and thus the modified project would result in net negative emissions. It would have no impact with respect to violating an air quality standard, contributing to an existing or project air quality violation, or resulting in a cumulatively considerable increase in criteria air pollutants.

Health Risk: As addressed in the 3700 California EIR, the project site is within the APEZ. As defined in San Francisco Health Code article 38, the APEZ consists of areas that, based on modeling of all known air pollutant sources, exceed health protective standards for cumulative annual average $PM_{2.5}$ concentrations, cumulative lifetime excess cancer risk, and proximity to freeways. For this addendum, results from an updated health risk assessment (HRA) are used to determine whether the modified project would result in health risk impacts that would exceed the applicable thresholds in the San Francisco Department of Public Health's APEZ criteria. The updated construction emissions for the modified project and new emissions from the emergency generator were modeled to determine the corresponding health risks from these sources. The updated HRA considered three scenarios with different exposure durations for onsite and offsite receptors; these scenarios and the corresponding results are presented in more detail in the air quality analysis.[20] The maximum cancer risk and $PM_{2.5}$ concentration at the maximally exposed individual receptors onsite and offsite are shown in Table 9. Although three scenarios were modeled, only the maximum values are shown. The results also reflect removal of the corresponding risks from the existing generator, which would be removed under the modified project. Note that the existing generator risks were removed from the onsite receptors' risk total because the new receptors would not have been exposed to the existing generators. This methodology is consistent with the 3700 California Street EIR. In addition, the modeled results in Table 9 reflect implementation of Mitigation Measure M-AQ-3 because that mitigation measure was determined to be necessary to mitigate the potentially significant health risks identified for the EIR project. It is not a new mitigation measure and is not being proposed to mitigate a new type of impact that was not previously disclosed in the final EIR. As shown in Table 9, the modified project would result in lower cancer risks than the EIR project, a lower $PM_{2.5}$ concentration at offsite receptors than the EIR project, but a higher $PM_{2.5}$ concertation at onsite receptors than the EIR project. The cumulative discussion below provides further context for evaluating the modified project's contributions relative to the APEZ criteria and the APEZ significance thresholds.

Cumulative Health Risk Assessment: The EIR evaluated cumulative health risks using the EIR project's contributions to risks and background risks at the maximally exposed individual receptor locations from the 2020 San Francisco Citywide HRA. For this addendum, the modified project's contributions to risk (present prior in Table 9) are evaluated relative to the background risks. Additional detail on the scenarios modeled and methods used can be found in the air quality analysis.[21]

Table 10 summarizes the cumulative HRA results for cancer risk and $PM_{2.5}$ concentrations for the EIR project and modified project. As noted above, the modeled results for the project contribution shown in Table 10 reflect implementation of Mitigation Measure M-AQ-3. It is not a new mitigation measure and is not being proposed to mitigate a new type of impact that was not previously disclosed in the final EIR.

[20] Ramboll. 2025. *Air Quality CEQA Analysis Results 3700 California Street Project, San Francisco, CA.* February 13.

[21] Ibid.

Table 9: Summary of Health Risk Assessment Results[a]

Project Version	Health Impact	Cancer Risk (in a million)	$PM_{2.5}$ (µg/m³)
EIR Project	Offsite maximally exposed individual receptor[a]	6.1	0.032
	Onsite maximally exposed individual receptor[b]	1.6	0.011
Modified Project[c]	Offsite maximally exposed individual receptor	5.0	0.030
	Onsite maximally exposed individual receptor	1.0	0.019

Notes:

a. All results in this table reflect implementation of Mitigation Measure M-AQ-3, as presented in the final 3700 California Street EIR.

b. The EIR project results are from revised Table 4.4-8 of the final 3700 California Street EIR and reproduced in Table C of the air quality analysis.[22]

c. The modified project results are from Tables XXII and XXIII of the air quality analysis.

Table 10: Summary of Cumulative Health Risk Assessment Results

Receptor Location	Total Cumulative Background Contribution		Project Contribution[a]		Meets APEZ Criteria?	APEZ Significance Threshold Exceeded?
	Cancer Risk[b]	PM2.5[c]	Cancer Risk[b]	PM2.5[c]		
EIR Project[d]						
Offsite	91	9.0	6.1	0.032	No	N/A[e]
Onsite	119	9.2	1.6	0.011	Yes (cumulative cancer risks greater than 100); No for PM2.5[f]	No (project contribution cancer risk less than 7); N/A for PM2.5[f]
Modified Project[g]						
Offsite	131	9.3	5.0	0.030	Yes (cumulative cancer risks greater than 100; cumulative PM2.5 concentration greater than 9.0 µg/m³)	No (project contribution cancer risk less than 7; project contributionPM2.5 concentration less than 0.2 µg/m³)
Onsite	111	9.1	1.0	0.019		

a. All project contribution results in this table reflect implementation of Mitigation Measure M-AQ-3, as presented in the final 3700 California Street EIR.

b. Values are expressed in terms of excess cancer risk per one million.

c. Values are expressed in terms of µg/m³.

d. EIR project values are from Tables 4.4-8 and 4.4-9 in the final 3700 California Street EIR.

e. N/A (not applicable) is shown when the APEZ criteria are not exceeded, consistent with the final EIR.

f. When the EIR was published, the APEZ criteria for PM2.5 was 10.0 µg/m³, but it has since been lowered to 9.0 µg/m³. Thus, the onsite receptors did not meet the APEZ criteria for PM2.5 as defined by the criteria when the EIR was prepared.

g. Modified project values are from Tables XXI and XXII in the air quality analysis.[23]

[22] Ramboll. 2025. *Air Quality CEQA Analysis Results 3700 California Street Project, San Francisco, CA.* February 26.

[23] Ramboll. 2025. *Air Quality CEQA Analysis Results 3700 California Street Project, San Francisco, CA.* February 26.

The purpose of the cumulative HRA is to determine if offsite or onsite receptors would be exposed to cancer risks and $PM_{2.5}$ concentrations that meet the APEZ criteria, which are an excess cancer risk greater than 100 in a million and a $PM_{2.5}$ concentration greater than 9.0 micrograms per cubic meter ($\mu g/m^3$).[24] As shown in Table 10, the modified project would result in offsite and onsite receptors being exposed to cumulative cancer risks that would meet the APEZ criteria. This is different compared with the EIR project, which found that only onsite receptors would be exposed to cumulative cancer risks that would meet the APEZ criteria. Therefore, the modified project's cancer risk contribution at offsite and onsite receptors should be compared to the APEZ significance threshold of 7 per million for cancer risk. As shown in Table 10, the modified project's contribution is a maximum of 5 per million and thus less than the APEZ significance threshold of 7 per million. Thus, although there would be a difference compared with the EIR project (i.e., offsite receptors would meet the APEZ criteria for the modified project), the project's contribution would be below the APEZ threshold for the modified project. This is the same conclusion reached for the EIR project.

For $PM_{2.5}$ concentrations, the EIR project was found to not meet the APEZ criteria for offsite or onsite receptors, because the background contribution was below 10.0 $\mu g/m^3$, which was the APEZ criterion at the time the EIR was prepared. However, the APEZ limit for $PM_{2.5}$ was subsequently lowered to 9.0 $\mu g/m^3$, and the onsite and offsite receptors would be above that concentration for the modified project. Therefore, the modified project's $PM_{2.5}$ contribution at offsite and onsite receptors should be compared to the APEZ significance threshold of 0.2 $\mu g/m^3$. As shown in Table 10, the modified project's contribution is a maximum of 0.03 $\mu g/m^3$ and thus less than the APEZ significance threshold. Thus, although there would be a difference compared with the EIR project (i.e., onsite and offsite receptors would meet the APEZ criteria for the modified project), this is because the APEZ criterion for $PM_{2.5}$ was changed subsequent to the EIR, and the project's contribution would be below the APEZ threshold for the modified project. The modified project's $PM_{2.5}$ concentration contribution is thus not significant, like the EIR project.

Like the EIR project, the modified project would result in a considerable contribution to cumulatively significant health risk impacts at sensitive receptors. However, Mitigation Measure M-AQ-3 would ensure that the modified project's contribution to cumulative health risk impacts would be below significance thresholds, as shown in Table 10. Therefore, with implementation of Mitigation Measure M-AQ-3, the modified project would result in a less-than-significant contribution to cumulative health risks. Lifetime excess cancer risks and annual average $PM_{2.5}$ concentrations would be less than those disclosed for the EIR project. Impacts would not be more severe than those previously identified in the EIR and would not require new mitigation measures.

Mitigation Measure M-AQ-3 has been revised to reflect updated methodology and implementation procedures relating to the minimization of construction emissions since the final EIR was certified. Like the original Mitigation Measure M-AQ-3 from the final EIR, the modified measure sets forth engine requirements, waivers, a construction emissions minimization plan, and monitoring. In addition, the modified Mitigation Measure M-AQ-3 includes the substantive requirements of original Mitigation Measure M-AQ-3 from the final

[24] San Francisco Planning. *Air Quality and Greenhouse Gas Analysis Guidelines.* February 2025. Available: *https://citypln-m-extnl.sfgov.org/SharedLinks.aspx?accesskey=ac7ae6c9956af1a8126fecf6f1663eba4a88e8e536ba4899502503bf69c1ae51&VaultGUID=A4A7DACD-B0DC-4322-BD29-F6F07103C6E0*. Accessed: February 26, 2025.

EIR. The revisions do not provide new information that would result in any new significant impact not already identified in the final EIR, or a substantial increase in the severity of the impacts identified in the final EIR, and the project sponsor has agreed to adopt the modified measure.

Consistency with the 2017 Clean Air Plan: The 3700 California Street EIR found that the EIR project would be consistent with the 2017 Clean Air Plan. The modified project would not change the measures from the Clean Air Plan that would be applicable and would not change the project's consistency with those measures. Thus, the project features on page 4.4-52 of the draft EIR (e.g., installing a solar or living roof, planting new trees, composting and recycling construction materials, providing a non-potable water system) would still be implemented and would continue to align with the building, energy, natural- and working-lands, waste, and water sectors from the Clean Air Plan. Furthermore, the modified project would be located in the same area of the city as the EIR project, which is within one of the city's transit priority areas where there are several bus stops in proximity. Many of the day-to-day needs in this area can be met by walking, bicycling, or taking transit to or from the project site. Thus, the EIR and modified project location would encourage the use of alternative transportations modes, which aligns with the Clean Air Plan. In addition, as with the EIR project, many of the control measures from the Clean Air Plan would also be required under the general plan, planning code, and green building code. For these reasons, the modified project would include applicable control measures identified in the Clean Air Plan and would support the primary goals of the plan. The modified project would also not disrupt or delay implementation of the Clean Air Plan because, like the EIR project, it would not preclude the extension of a transit line or a bike path or any other transit improvement.

Lastly, the modified project would support the goals of the Clean Air Plan because it would result in a net decrease in emissions compared with existing conditions.

Cumulative Impacts

As noted in the EIR, the contribution of a project's individual air emissions to regional air quality impacts is, by nature, a cumulative effect. Thus, the discussion above of construction and operational emissions is representative of a cumulative criteria air pollutant analysis.

With respect to health risks, the cumulative health risk results (Table 10, p. 49) incorporate the background citywide cancer risks and $PM_{2.5}$ concentrations and thus are considered to be cumulative-level results.

Conclusion

In summary, the modified project would thus not result in new significant air quality impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

Topics Addressed in the Initial Study (EIR Appendix B)

The following analysis addresses topics addressed in the initial study, included as Appendix B to the 3700 California Street EIR. The initial study found that the implementation of the EIR project would have less-than-significant impacts for the following topics: land use and planning, population and housing, greenhouse gas

emissions, wind and shadow, recreation, utilities and service systems, public services, hazards and hazardous materials, mineral and energy resources, and agriculture and forestry resources; and less-than-significant impacts with mitigation for the following topics: cultural resources, tribal cultural resources, biological resources, and geology and soils.

LAND USE AND PLANNING

The project site consists of parcels with RM-2 and RH-2 zoning. The 3700 California Street EIR found that the existing hospital/institutional uses at the EIR project site were granted by a conditional use permit; therefore, the proposed residential uses under the EIR project would bring the project site into greater conformity with the residential RH-2 and RM-2 zoning districts. Similar to the EIR project, the modified project proposes residential uses consistent with existing RH-2 and RM-2 zoning; no rezoning is proposed or required. The modified project would not change the land use controls applicable to the project site. Therefore, the modified project would not result in new significant land use and planning impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

POPULATION AND HOUSING

The 3700 California Street EIR determined that the EIR project would lead to an increase in the residential population and a decrease in onsite employment, which would be noticeable compared with existing conditions at the project site. Specifically, the EIR project would increase the number of residents by 680 (for a total of 701, including the approximately 21 existing onsite residents at 401 Cherry Street); the EIR project would require 10 employees (a decrease of approximately 1,530 compared to existing conditions) once the EIR project is operational. However, these changes would be minor in the citywide and regional context and would not be substantial in relation to the expected and planned increases in the residential population in the city. In addition, the 3700 California Street EIR determined that because the existing residents at the 401 Cherry Street building would remain under the EIR project, it would not displace existing people or housing units, and no replacement housing would be needed. Therefore, overall impacts on population and housing were determined to be less than significant.

Direct and Indirect Project-Related Population Growth: Modified project construction would be similar in scale to that of the EIR project. It is anticipated to occur in three phases over approximately three years and three months, as would the EIR project. As with the EIR project, it is anticipated that construction employees associated with the proposed project who are not already living in the city would commute from their residences elsewhere in the Bay Area rather than permanently relocate to San Francisco; this is typical for employees in the various construction trades. Once the construction phases are complete, construction workers typically seek employment at other job sites in the region that require their particular skills. Thus, construction of the modified project would not generate a substantial population increase in the city or region, consistent with the EIR project, and impacts would be less than significant.

As described above, the modified project would involve new residential and institutional development, including 19 new residential buildings (multi-family and single-family residences), an existing nine-unit residential building that would be retained, and an existing medical building that would be converted to accommodate assisted living, memory care, and senior housing, providing a total of 493 dwelling units. The modified project would directly increase the residential population on the project site, as shown in Table 11.

Table 11: Onsite Residents under the Modified Project

Unit Type	Number of Units	Bedrooms/ Units	Total Bedrooms	Persons/ Household Rate	Residents/ Unit	Bedroom Bonus[a]	Added Bonus Population	Total Added Population
SFR	15	4	60	2.29[b]	35	*0.2*	*12*	47
MF-Studio	39	1	39		89	*0*	*0*	89
MF-1BR	115	1	115		263	*0*	*0*	263
MF-2BR	150	2	300		344	*0*	*0*	344
MF-3BR	16	3	48		37	*0.15*	*7*	44
MF-Studio (Senior)	10	1	10	1.63[c]	16	*0*	*0*	16
MF-1BR (Senior)	97	1	97		158	*0*	*0*	158
MF-2BR (Senior)	51	2	102		83	*0*	*0*	83
INST-Studio	39	1	39	1.32[c]	52	*0*	*0*	52
INST-1BR	23	1	23		30	*0*	*0*	30
INST-2BR	12	2	24		16	*0*	*0*	16
TOTAL	**567**		**857**		**1,123**		***19***	**1,142**

Notes: Totals are rounded to the nearest whole number. Numbers may not sum due to rounding.
SFR = single-family residence; MF = multi-family; INST = institutional unit (memory care); BR = bedroom
Source: The Prado Group, 2024.

a. Consistent with methodology used in the 3700 California Street EIR for the EIR project, this analysis considers the larger units proposed by the modified project, namely the three- and four-bedroom units; an additional 0.2 person per bedroom was included for four-bedroom units (i.e., single-family units), along with an additional 0.15 person per bedroom for multi-family three-bedroom units.

b. U.S. Census Bureau, *QuickFacts, Families and Living Arrangements, Persons Per Household, 2018–2022*, https://www.census.gov/quickfacts/fact/table/sanfranciscocitycalifornia,ca,US/HSD410217, accessed November 22, 2024.

c. The persons-per-household rate for senior living and institutional uses was based on the average number of people per unit type (e.g., assuming one person per studio unit, 1.5 persons per 1-bedroom unit, and 2 persons per 2-bedroom unit).

As shown in Table 11, based on the citywide average household size of 2.29 persons, as well as rates specific to senior housing and memory-care units, the modified project would accommodate approximately 1,123 residents; however, taking into consideration the larger units (e.g., single-family residences and three-bedroom units), the modified project would result in a total of approximately 1,142 residents at the project site. In addition, the modified project would include 10 multi-family and senior housing employees who would work as the lobby and maintenance staff. The modified project would include 82 employees for the proposed institutional uses (i.e., memory-care units). This shift work would require nurses, caregivers, janitorial and facility maintenance personnel, a kitchen staff, general manager, administrators, and activities coordinators. Furthermore, approximately 14 employees would work in the proposed restaurant. In total, the modified project would result in approximately 106 employees. This would represent an increase in employees compared to the EIR project. However, employment at the project site would still be reduced by approximately 1,434 under the modified project. [25]

According to the 2022 American Community Survey, San Francisco has a population of approximately 851,036.[26] According to the City's 2022 Housing Element EIR Update, San Francisco's population will increase by approximately 555,964 by 2050, growing to 1,407,000.[27] Therefore, the addition of 1,142 new residents resulting from the modified project would account for approximately 0.21 percent of the residential growth expected in the city. Based on the City projections for population, the modified project's residential population is well within the range of anticipated growth for San Francisco. Therefore, the modified project would not induce substantial unplanned population growth, consistent with the EIR project.

As with the EIR project, the modified project would be located on an infill site surrounded by existing residential development and would be served by existing transportation routes, utilities, and public services. Therefore, the proposed improvements required to serve the modified project would not enable additional development or indirectly induce substantial population growth in the area. Therefore, consistent with the EIR project, no indirect impact related to population growth would occur under the modified project.

Overall, the modified project would lead to an increase in the residential population and a decrease in onsite employment. However, these changes would be minor in the citywide context of population growth. They would not be substantial in relation to expected and planned increases in the residential population of the city. Therefore, the modified project would not directly or indirectly induce substantial population growth. Impacts on population growth would be less than significant, consistent with the EIR project, and no mitigation measures are required.

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[25] Consistent with the approach used for the EIR project, according to the CPMC's 2008 Institutional Master Plan, approximately 1,540 people were previously employed at the hospital located on the project site (see California Pacific Medical Center, 2008, *Institutional Master Plan*, Section Eight: California Campus, p.104). Therefore, assuming 1,540 employees on the project site, the modified project would reduce the number of employees onsite by approximately 1,434 (i.e., 1,540 existing employees minus 106 modified project employees = - 1,434 employees).

[26] California Department of Finance, 2018–2022 American Community Survey (5-year Estimates) General Demographics, 2023, https://dof.ca.gov/reports/demographic-reports/american-community-survey/#ACS2022x5, accessed December 6, 2024.

[27] San Francisco Planning Department, *San Francisco Housing Element 2022 Update Draft Environmental Impact Report*, 2022, https://sfplanning.org/environmental-review-documents?title=Housing+Element+2022&field_environmental_review_categ_target_id= All&items_per_page=10, accessed December 6, 2024.

Displacement: Consistent with the EIR project, the modified project would retain the existing building at 401 Cherry Street. Therefore, implementation of the modified project would not displace existing people or housing units, and no replacement housing would be needed. Similar to the EIR project, this impact would be less than significant under the modified project, and no mitigation measures are required.

In summary, the modified project would not result in new significant population and housing impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigaiton measures are required.

CULTURAL RESOURCES

Historical Resources: The original October 17, 2018, Historic Resource Evaluation Response, Part I (HRER Part I), in Appendix C of the 3700 California Street EIR, noted that one historic architectural resource had been previously identified within the project site: the Marshal Hale hospital building at 3698 California Street. The planning department determined that the building is eligible for listing in the California Register of Historical Resources under Criterion 3 (Architecture) as a distinctive example of an Art Deco institutional building with Art Moderne elements. It is not eligible under Criterion 1 (Event), 2 (Persons), or 4 (Information Potential). The period of significance under Criterion 3 is 1939. The HRER determined that the building retains integrity of location, association, design, workmanship, feeling, and materials. However, the building does not retain integrity of setting due to the construction of newer medical facilities within the surrounding CPMC campus. Character-defining features of the Marshal Hale hospital building include:

- Rectangular plan, three-story massing
- Central pavilion, three bays wide, and two slightly recessed wings, each four bays wide, that extend along California Street to the east and west
- Recessed entry, stepped up from sidewalks, that features
  - Terrazzo floor in three colors, with brass dividers strips that illustrate the stylized floor and include a dedication plaque that reads “Hahnemann Hospital—Erected by the Homeopathic Foundation of California”
  - Side panels at the entranceway, with decorative stylized flora
  - Transom, with an applied scroll pattern topped by a triangular pattern
- Art Deco features that include
  - Massing that emphasizes verticality
  - Symmetrical balancing of features
  - Recessed facades arranged in a series of setbacks, emphasizing geometric form
  - Low-relief decorative elements and stylized flora patterns at the central pavilion entrance of the building, including

  - Four fluted pilasters with flat trim that define three bays
  - Two center pilasters with applied buttresses that rise midway up the second story
  - Blank recessed panel that forms the implied trabeation for the pilasters below, bordered by a molded stylized daisy motif and flanked by square panels with bas-relief decoration
  - Stepped cornice with an applied decorative crest below

- Art Moderne features that include
  - Rounded corner canopy projecting over the recessed entrance
  - Smoothed stucco finish on exterior walls
- Steel-sash windows that are arranged symmetrically across each bay and slightly recessed from the front of the façade, creating typical pilasters of the Art Deco and Art Moderne styles

The 3700 California Street EIR determined that no other buildings or structures on the project site are considered historic architectural resources, and there is no historic district to which the extant buildings and structures on the project site contribute. The proposed rehabilitation of the Marshal Hale hospital building under the EIR project was found to be in conformance with the Secretary of the Interior's Standards for Rehabilitation (the Standards). It is presumed that a project that complies with the Standards would not cause a substantial adverse change in the significance of a historical resource. However, the demolition of the existing hospital facilities that surround the Marshal Hale hospital building and the construction of new residential buildings within the project site would further alter the building's integrity of setting. The EIR project would implement Improvement Measure I-CR-A, *Historic Resource Interpretation*, to further reduce the less than significant impact on the historic resource's setting.

Furthermore, construction activity under the EIR project that would occur around the Marshal Hale hospital building would have the potential to demolish or alter in an adverse manner the physical characteristics that convey the resource's historical significance. As such, the EIR project's construction impacts on the Marshal Hale hospital building would be potentially significant. However, with implementation of Mitigation Measure M-CR-1, *Historic Preservation Plan and Protective Measures for 3698 California Street*, the overall integrity of the Marshal Hale hospital building would be retained, and the physical characteristics that convey its historical significance would not be demolished or altered in an adverse manner. Therefore, the EIR project would result in less-than-significant impact on a historical resource.

The planning department evaluated potential historical resource impacts of the modified project in the *Historic Resource Review* completed by on January 10, 2025, and included as Appendix C.[28] The following section summarizes the findings of the *Historic Resource Review.* The modified project would include the demolition of five of the six existing hospital buildings on the project site, adaptive reuse and expansion of the Marshal Hale hospital building at 3698 California Street for residential and institutional uses, retention of the existing nine-unit residential building at 401 Cherry Street, and construction of 19 new residential buildings, ranging from three to seven stories.

[28] San Francisco Planning Department, Historic Resource Review, Record No. 2017-003559ENV-02, 2700 California Street, January 2025.

The EIR project included retention, rehabilitation, and reuse of the historical resource at 3698 California Street building, including demolition of later additions to bring the building back to its original 1939 rectangular floorplan. Although the modified project would still include demolition of some later additions, the Marshal Hale hospital building itself would be incorporated as part of a larger seven-story, mixed-use building. The proposed new construction would be set back from the original façade of the building, and the building elevations on California and Maple streets would be mostly retained. Specifically, the existing windows along each façade would be replaced with new windows that would match the originals in material, design, and operation. In addition, the existing door on the Maple Street façade would be removed and replaced with a new window. The entry on California Street would be retained as an access point but with the existing door removed and replaced with a new door that would match the material, design, and operation of the original. The existing design elements of the building would be retained, and the façades would be re-painted. As such, the modified project would be in conformance with most of the Standards but not fully in conformance with all 10 standards. Although there are some elements that are not in conformance with Standards 2 and 9, other elements of the modified project are in conformance with the Standards. However, the *Historic Resource Review* determined that the modified project, even if not entirely in conformance with all 10 standards, would not cause material impairment to the historic resource such that it would no longer retain its eligibility for listing in the California Register of Historical Resources. The *Historic Resource Review* includes a full analysis of the Standards and is attached hereto as Appendix C.

As defined in more detail in the HRER, Part I, dated October 17, 2018, and summarized in the *Historic Resource Review* (dated January 22, 2025), 3698 California Street retains all aspects of integrity, except for setting. Although changes have already occurred to the setting of the Marshal Hale hospital building due to changes at the CPMC campus over time, the modified project would further reduce the historical integrity of the resource's setting and association. However, the historic resource would retain integrity of location, workmanship, design, materials, and feeling and therefore would retain its historical integrity. Improvement Measure I-CR-A would help retain the historic association and compromised setting of the resource by interpreting for the public the resource's historic medical context and would further reduce the less than significant impact.

Similar to the EIR project, implementation of Mitigation Measure M-CR-1 for the modified project would reduce the potential adverse impacts caused by the modified project's surrounding construction activity on the historic resource to a less-than-significant level. Therefore, the modified project would have a less-than-significant impact on the historic resource with implementation of a mitigation measure.

Based on the *Historic Resource Review*, a determination was made that the modified project would not result in a significant adverse impact on the individual historic resource as proposed. The modified project would not cause material impairment to the historic resource and its impact on historic resources would be less than significant. Therefore, the modified project would not result in new significant impacts that were not previously identified in the 3700 California Street EIR, would not result in more severe impacts than those identified in the 3700 California Street EIR, and would not require new mitigation measures.

Archaeological Resources: Under the 3700 California Street EIR, the planning department conducted a preliminary archaeological review of the project site. The review found that the closest precolonial resource is approximately 2,000 feet north of the project site. The project site was also identified as an area that is highly sensitive for undiscovered near-surface and buried archaeological deposits due to the locations of historic water sources in the area. In addition, the project site is adjacent to the former northern entrance to Lone Mountain Cemetery. An additional review of maps confirmed that the project site was outside the boundary of the cemetery and that it is unlikely that any historic burials would be present within the project site. Nonetheless, the initial study determined that the potential exists for undocumented precolonial and/or historic archaeological sites, including human remains, to be uncovered during ground-disturbing activities such as excavation for the EIR project. With implementation of Project Mitigation Measure M-CR-2, *Archaeological Testing Program*, the EIR project would result in less-than-significant impacts on human remains and archaeological resources.

An Environmental Planning Cultural Resources Review (CRR) (2017-003559ENV-02)[29] completed on February 26, 2025, provided an archaeological sensitivity summary for the modified project elements. As shown in Table 5, the depth of excavation under the modified project would change from that under the EIR; increasing from 13 feet to 27 feet at Block A, reducing from 75 feet to 36 feet at Block B, and increasing from 17 feet to 22 feet at Block C). The CRR concluded that based on geographical features such as landform age, slope, and proximity to fresh water sources, the project area is highly sensitive for surficial and buried precolonial archaeological resources as well as historic era resources associated with 19th century development and Lone Mountain Cemetery. This determination is consistent with the 3700 California Street EIR analysis.

Mitigation Measure M-CR-2, which entails consultation with descendant communities, archaeological testing, monitoring, data recovery, and reporting, would reduce the impact to a less-than-significant level. The modified project would result in some changes involving site preparation, demolition, grading, and the location or depth of excavation, but would not result in any changes to the findings regarding cultural resources (i.e., archaeological resources, human remains, tribal cultural resources), and Mitigation Measure M-CR-2 still applies.

Mitigation Measure M-CR-2 has been revised to reflect updated methodology and implementation procedures relating to archeological testing since the final EIR was certified. Like the original Mitigation Measure M-CR-2 from the final EIR, the modified measure sets forth requirements of an archeological testing program for identifying and documenting archeological resources. In addition, the modified Mitigation Measure M-CR-2 includes the substantive requirements of original Mitigation Measure M-CR-2 from the final EIR. The revisions do not provide new information that would result in any new significant impact not already identified in the final EIR, or a substantial increase in the severity of the impacts identified in the final EIR, and the project sponsor has agreed to adopt the modified measure. Therefore, the modified project would continue to result in less-than-significant impacts with mitigation for cultural resources.

[29] Environmental Planning Cultural Resource Review (CRR) MEMO Part A. General Project Information Case number 2017-003559ENV-02 (2024-005897PRJ) Review Date 2/26/2025 Project address 3700 California Revision Date APN 1015/1, 52, and 53. 1016/1, 2, 3, 4, 5, 6, 7, 8, 9. 1017/27, 28 EP planner Sherie George

In summary, the modified project would not result in new significant cultural resources impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

TRIBAL CULTURAL RESOURCES

Under the 3700 California Street EIR, and in accordance with Assembly Bill 52, the planning department conducted Native American outreach. During the 30-day consultation period (beginning on July 5, 2018), the planning department received no response to the outreach. The initial study determined that the project area was highly sensitivity for precolonial tribal cultural resources and that the EIR project could potentially impact tribal cultural resources during excavation activities. Implementation of Mitigation Measures M-CR-2, *Archaeological Testing Program,* and M-CR-3, *Tribal Cultural Resources Interpretive Program*, impacts would be less than significant.

As noted under archaeological resources, construction of the modified project would also involve excavation activities. As shown in Table 5, the depth of excavation under the modified project would change from that under the EIR; increasing from 13 feet to 27 feet at Block A, reducing from 75 feet to 36 feet at Block B, and increasing from 17 feet to 22 feet at Block C). The CRR concluded that based on geoarchaeological analyses such as slope, landform age, and proximity to water, there is a high potential for surficial and buried Native American resources to be located throughout the modified project site. This determination is consistent with the 3700 California Street EIR analysis.

Excavation activities under the modified project could result in a potentially significant impact if tribal cultural resources are encountered. Mitigation Measure M-CR-2 and Mitigation Measure M-CR-3, applicable to the EIR project, would also be applicable to the modified project. As discussed previously, Mitigation Measure M-CR-2 has been revised to reflect updated methodology and implementation procedures relating to archeological testing since the final EIR was certified. Like the original Mitigation Measure M-CR-2 from the final EIR, the modified measure sets forth requirements of an archeological testing program for identifying and documenting archeological resources. In addition, the modified Mitigation Measure M-CR-2 includes the substantive requirements of original Mitigation Measure M-CR-2 from the final EIR.

Mitigation Measure M-CR-3 has been revised to reflect updated methodology and implementation procedures relating to interpretive programs since the final EIR was certified. Like the original Mitigation Measure M-CR-3 from the final EIR, the modified measure sets forth requirements for development of a Tribal Cultural Resources Public Interpretation Plan. In addition, the modified Mitigation Measure M-CR-3 includes the substantive requirements of original Mitigation Measure M-CR-3 from the final EIR.

The revisions do not provide new information that would result in any new significant impact not already identified in the final EIR, or a substantial increase in the severity of the impacts identified in the final EIR, and the project sponsor has agreed to adopt the modified measure. Therefore, the modified project would continue to result in less-than-significant impacts with mitigation regarding tribal cultural resources.

Overall, the modified project would not result in new significant tribal cultural resources impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

GREENHOUSE GAS EMISSIONS

The EIR project was determined to be consistent with San Francisco's GHG reduction strategy. Through the preparation of an updated GHG compliance checklist, the modified project was similarly determined to be consistent with San Francisco's GHG reduction strategy.[30] Therefore, the modified project's GHG emissions would not conflict with state, regional, or local GHG reduction plans and regulations. Impacts would be less than significant. The modified project would not result in new significant greenhouse gas emissions impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

WIND

Wind conditions under the EIR project were determined to not exceed the City's wind hazard criterion at any time throughout the year. Therefore, the EIR project would not substantially alter the existing wind conditions along public sidewalks in an adverse manner. Under the modified project, the proposed buildings would reach the same heights as those proposed under the EIR project (approximately 40- to 80-foot-tall buildings). Therefore, consistent with the EIR project, the modified project would result in a less-than-significant impact. The modified project would not result in new significant wind impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

SHADOW

The EIR project was determined to not create new shadow that substantially affects existing outdoor recreation facilities or other public areas. By constructing a project with similar massing and with the same heights as the EIR project, the modified project would not cast shadow on any open space that is under the jurisdiction of the San Francisco Recreation and Parks Commission. The udpated shadow fan for the modified project shows that it would similarly not shodow existing outdoor recreation facilities or other public areas.[31] Therefore, consistent with the EIR project, the modified project would result in a less-than-significant shadow impact. Thus the modified project would not result in new significant shadow impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

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[30] San Francisco Planning Department, *Compliance Checklist Table for Greenhouse Gas Analysis,* Table 1, Private Development Projects, 3700 California Street, July 30, 2024 (revised February 4, 2025).

[31] San Francisco Planning Department. 2025. *3700 California St – 96 Ft Shadow Fan.* January 22.

RECREATION

The 3700 California Street EIR determined that the project would lead to an increase in the number of residents (i.e., 680 additional residents). However, because the project site is well served by a variety of well-maintained, accessible recreational spaces within 0.5 miles and the EIR project would offset its demand for recreational space through the provision of almost 2 acres of additional open space that would be available to residents, the demand generated by the EIR project would be balanced among existing and new facilities. It would not cause physical deterioration of existing facilities or generate the need for the construction of new recreational spaces. Therefore, overall impacts, including cumulative impacts, on recreational facilities were determined to be less than significant.

Although the modified project would reduce the amount of open space by 17,400 square feet (i.e., from 88,100 square feet to 70,700 square feet) per Table 3, p. 19, (and detailed in Table 12, below) the modfied project would also be able to serve existing and future project residents in the area. The modfied project would provide an additional 33,400 square feet of shared amenities, including an additional 2,200 square feet of shared amenities in Block A compared to the EIR project. Therefore, consistent with the EIR project, the modified project would result in less-than-significant impacts on recreational resources, and no mitigation measures are required.

Table 12: Open Space Square Footage Comparison between EIR and Modified Project (square feet)

Blocks	EIR Project	Modified Project
Block A		
Private Open Space	11,200	2,800
Common Open Space	3,900	7,500
Block B		
Private Open Space	23,800	11,300
Common Open Space	15,900	30,200
Block C		
Private Open Space	12,700	6,800
Common Open Space	20,600	12,100
TOTAL	**88,100**	**70,700**

Notes: Numbers may not sum because of rounding.

In summary, the modified project would not result in new significant recreation impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

UTILITIES AND SERVICE SYSTEMS

The 3700 California Street EIR determined that the EIR project would lead to an increase in the residential population with its 701 additional residents and a decrease in onsite employment, which would result in changes in demand on utilities compared with existing conditions at the project site. Overall, the EIR project was found to result in a reduction in the wastewater and stormwater generated at the project site. It would not require the construction or relocation of stormwater, wastewater, electric, natural gas, or telecommunication facilities, other than localized connections on the project site to the existing systems. The 3700 California Street EIR also determined that adequate water supplies from the SFPUC would be available to serve project demand, unless the Bay-Delta Plan Amendment is implemented. In the event that the Bay-Delta Plan Amendment is implemented, the SFPUC would address water supply shortfalls through increased rationing and alternative water supplies. With respect to solid waste, the EIR project would comply with the San Francisco construction and demolition debris recovery and recycling and composting ordinances and would not generate solid waste in excess of local infrastructure capacity. Therefore, overall impacts, including cumulative impacts, on utilities and service systems were determined to be less than significant for the EIR project.

Wastewater and Stormwater: The project site is served by the combined sewer collection and wastewater treatment system. As with the EIR project, because the modified project would be in the Oceanside Water Pollution Control Plant drainage basin, it would be required to comply with San Francisco regulations regarding wastewater and stormwater generation. Although the modified project would most likely result in increased wastewater flow compared to exisitng consitions, regulations require, for applicable projects, stormwater flows to be reduced by 25 percent compared with existing conditions. The 25 percent reduction in stormwater flows would result in an overall reduction in combined flows during peak wet-weather flow events. Furthermore, the modified project would install 4- to 12-inch-diameter sewer laterals to connect each of the proposed residential buildings to the gravity sewer lines under California, Sacramento, Cherry, and Maple streets in order meet project demands. Therefore, the modified project, would have a less-than-significant impact on the combined sewer collection and treatment system, and no mitigation measures are required.

Water: The SFPUC reviewed the modified project and determined that a water supply assessment would not be required because, like the EIR project, it would result in a net decrease in water demand compared to baseline conditions.[32] Therefore, consistent with the EIR project, adequate water supplies from the SFPUC would be available to serve the modified project demand, unless the Bay-Delta Plan Amendment is implemented. In the event that the Bay-Delta Plan Amendment is implemented, the SFPUC would address water supply shortfalls through increased rationing and alternative water supplies. Furthermore, the modified project would include the same water utility and infrastructure improvements as the EIR project. This would include realigning a portion of an existing 8-inch-diamater domestic water line in California Street in front of Block B, a portion of an existing 12-inch-diameter domestic water line in Maple Street in front of Block B, and a portion of an existing 6-inch-diameter domestic water line in Maple Street in front of Block C.

[32] Personal communication, Fan Lau, San Francisco Public Utilities Commission, to Sherie George, San Francisco Planning Department, August 30, 2024.

New water connections would be provided to the proposed residential buildings, with each building separately metered at the sidewalk. In addition, low-pressure water for firefighting purposes would be provided from four existing fire hydrants along California, Sacramento, and Cherry streets. Four new low-pressure fire hydrants would also be installed along California and Sacramento streets. Therefore, the modified project would have a less-than-significant impact on water supplies, consistent with the EIR project, and no mitigation measures are required.

Solid Waste: All projects are required to comply with San Francisco's construction and demolition debris recovery and recycling and composting ordinances. As with the EIR project, compliance with these ordinances would reduce the solid waste generation from construction and operation of the modified project. In addition, the modified project would result in approximately 1,142 new residents and 106 new employees. Solid waste production is estimated at 6.6 pounds per person per day for residential uses and 10.6 pounds per day for employment uses.[33,34] Using this solid waste generation rate, the modified project would generate approximately 8,662 pounds (4.3 tons) of solid waste daily.[35] This equates to 0.2 percent of the Recology Hay Road Landfill's permitted maximum daily disposal capacity of 2,400 tons per day.[36,37] Therefore, given the City's progress to date on diversion and waste reduction, and given the future long-term capacity available at the Recology Hay Road Landfill and other area landfills the serve San Francisco, as with the EIR project, the modified project would be served by a landfill with adequate permitted capacity to accommodate solid waste disposal needs and would comply with applicable statutes and regulations related to solid waste. Impacts would be less than significant, consistent with the EIR project, and no mitigation measures are required.

In summary, the modified project would not result in new significant utilities and service systems impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

PUBLIC SERVICES

The 3700 California Street EIR determined that the EIR project would lead to an increase in the residential population with its 701 additional residents, which would result in increased demand on public services compared with existing conditions at the project site. It could also generate up to 93 students in the San Francisco Unified School District. However, although the EIR project would result in increased demand, it

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[33] California Department of Resources Recycling and Recovery, *Disposal Rate Calculator, San Francisco, 2023 Reporting Year, https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DisposalRateCalculator*, accessed: December 23, 2024.

[34] The City of San Francisco's actual waste production rate is 3.4 pounds per person for residential uses and 3.9 pounds per person for employment uses, based on the disposal rate calculator annual rate (see source in above footnotes). The higher rates were used to ensure a conservative (i.e., higher) estimate of solid waste that would be generated by the modified project, consistent with the approach used for the EIR project.

[35] A total of 6.6 pounds per day x 1,142 residents = 7,538 pounds per day. A total of 10.6 pounds per day x 106 employees = 1,124 pounds per day. A total of 7,538 pounds residential waste + 1,124 pounds employment waste = 8,662 total pounds of waste per day.

[36] California Department of Resources Recycling and Recovery, *SWIS Facility/Site Activity Details – Recology Hay Road* (48-AA-0002), *https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1184?siteID=3582*, accessed: December 23, 2024.

[37] Consistent with the EIR project, waste from the modified project would be disposed of at the Recology Hay Road Landfill, which has a closure date of 2077.

would not require the construction of new or the expansion of existing fire protection, police protection, school, or library facilities. Overall EIR project impacts, including cumulative impacts, on public services were determined to be less than significant.

Similar to the EIR project, the modified project would increase the population in the area, leading to an increase in demand for public services, including fire and police protection, school services, and library services. When considering the methodology used in the 3700 California Street EIR, the modified project could generate up to approximately 80 students, as shown in Table 13 , compared to the 93 students that would be generated under the EIR project. Therefore, because the modified project would generate fewer students than the EIR project, the San Francisco Unified School District would have adequate capacity within its existing facilities to accommodate the additional 80 students genertated by the modified project.

Other essential city service providers (i.e., police protection, fire protection, library facilities) continually assess demand, based on anticipated growth and service needs. By analyzing the applicable metrics, these agencies and services are able to adjust staffing, capacity, response times, and other measures of performance. As a result, the modified project would not result in any service gap in fire, police, schools, or library services. Therefore, the modified project would have less-than-significant public services impacts, and no mitigation measures are required.

Table 13: Students Generated by the Modified Project[a]

Unit Type	Number	Student Generation Rate[b]	Estimated Growth Due to Modified Project
SFR	15	0.75	11
MF-Studio	39	0.2	8
MF-1BR	115	0.2	23
MF-2BR	150	0.2	30
MF-3BR	16	0.5	8
Total	**335**	**Total**	**80**

Notes: Numbers may not sum because of rounding.
SFR = single-family residence; MF = multi-family residence; 1BR = one bedroom; 2BR = two bedrooms; 3BR = three bedrooms

a. The student count is based on the 335 standard residential units on the project site. The 232 units included in Block C (e.g., 158 senior housing units and 74 memory-care units) were not used to calculate the number of students that could be generated by the modified project since those senior housing units and memory-care units are restricted in occupancy age.

b. Source: Lapkoff & Gobalet Demographic Research, Inc., *Demographic Analyses and Enrollment Forecasts for the San Francisco Unified School District,* published February 16, 2018, https://demographers.com/wp-content/uploads/2020/07/SFUSD-dynamic-report-2018.pdf, accessed December 23, 2024.

In summary, the modified project would not result in new significant public services impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

BIOLOGICAL RESOURCES

The 3700 California Street EIR determined that the EIR project could cause a substantial adverse change due to the removal of trees and landscaped open areas on the 4.9-acre site as well as the removal of street trees on adjacent public rights-of way (i.e., habitat modification). The modified project changes would similarly remove trees and landscaped open areas on the project site and would therefore not alter the findings regarding biological resources. Mitigation Measure M-BI-1, *Preconstruction Nesting Bird Surveys and Buffer Areas*, would still be required. In addition, per the response to comments on the draft EIR, Improvement Measure I-BI-A was added to the final EIR to address concerns about the proposed removal of bee-sustaining flora. The new improvement measure requires a preconstruction survey for bee populations. Improvement Measure I-BI-A, *Preconstruction Survey for Bee Populations*, would still be required; therefore, the modified project would also result in less-than-significant impacts with regard to biological resources.

In summary, the modified project would not result in new significant biological resources impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation or changes to existing mitigation measures are required.

GEOLOGY AND SOILS

The geotechnical investigation prepared by Langan in 2019 and considered in the 3700 California Street EIR was updated in 2024[38] for the modified project. The report provides geotechnical and structural considerations for the modified project based on the site conditions and the modified project, including foundation recommendations and requirements for excavation and constructions. The project site's inherent conditions have not changed since certification of the 3700 California Street EIR. From a geotechnical perspective, the updated geotechnical investigation concluded the site can be developed as planned under the modified project. Changes to the modified project would not result in any changes to the findings regarding geology and soils as the Department of Building Inspection (building department) would review the modified project's construction documents for conformance with the geotechnical recommendations. The 3700 California Street EIR determined that the proposed earthwork for the EIR project would result in less-than-significant impacts; however, the potential for the inadvertent discovery of paleontological reources required standard mitiation to reduce the impact to a less-than-significant level. Mitigation Measure M-GE-4, *Inadvertent Discovery of Paleontological Resources*, applicable to the EIR project, would also apply to the modified project; therefore, the modified project would continue to result in less-than-significant impacts with regard to geology and soils. In summary, the modified project would not result in new significant geology and soils impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation or changes to existing mitigation measures are required.

[38] Langan Engineering and Environmental Services, Inc., *Geotechnical Investigation, Blocks A–C, 3700 California Street*, September 2019, updated May 2024.

HYDROLOGY AND WATER QUALITY

The 3700 California Street EIR found that the EIR project would result in no impact with respect to a release of pollutants in flood, tsunami, and/or seiche hazard area, and in less-than-significant impacts related to water quality, groundwater levels, alteration of drainage patterns, and the capacity of drainage infrastructure. The modified project proposes an additional 8,600 square feet of lot coverage, resulting in 145,600 square feet of building footprint compared to 137,000 square feet under the EIR project. As requried under the 3700 California Street EIR, the modified project would also comply with the Stormwater Management Ordinance, which would reduce impacts to a less-than-significant level. Compliance with this ordinance requires submittal of an erosion and sediment control plan, stormwater control plan, and post-construction stormwater design guidelines for review and approval by the SFPUC. Therefore, based on the requirements of existing regulations, the modified project would not violate water quality standards, substantially degrade water quality, or provide substantial additional sources of polluted runoff. Consistent with the EIR project, the modified project would result in less-than-significant impacts on hydrology and water quality, and no mitigation measures are required. In summary, the modified project would not result in new significant hydrology and water quality impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

HAZARDS AND HAZARDOUS MATERIALS

Redevelopment of the 3700 California Street Project site is subject to compliance with San Francisco Health Code, Article 22A and the Building Code, Section 106A.3.2.4. 1, 106A.3.2.4.2 and 106A.3.2.4.4 - Hazardous Substances. The 3700 California Street EIR found that the EIR project would have less-than-significant impacts related to hazards and hazardous materials due to compliance with the city's Maher Ordinance overseen by the San Francisco Department of Public Health and the Department of Building Inspection. Changes proposed by the modified project would not result in new transport, use, handling, or distribution of hazardous materials. As with the EIR project, the modified project would not be located on any open hazardous materials sites, within a wildfire zone, near any schools, or near any adjacent airports or airstrips. The project sponsor has submitted a revised Maher application for the modified project and will continue to work with the public health and building departments to comply with the Maher Ordinance. The modified project would not result in new significant hazards and hazardous materials impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

MINERAL RESOURCES

As addressed in the 3700 California Street EIR, there are no mineral resources recovery sites in San Francisco. The project site is not a mineral resource recovery site. Therefore, consistent with the findings from the 3700 California Street EIR, the modified project would not result in new significant or more severe impacts on mineral resources that were not previously identified. No new mitigation measures are required.

ENERGY

The EIR project was found not to result in wasteful or inefficent energy use or conflict with state or local renewable energy plans. Similar to the EIR project, the modified project would comply with Title 24 requirements and the 2016 San Francisco Green Building Code. Consistent with the EIR project, the modified project would not be required to comply with the City's all-electric building code requirements under Building Code section 106A.17, which applies to new buildings for which permits were filed after June 1, 2021. Because the modified project would use the previously filed building permits issued for the EIR project on December 22, 2019, the all-electric building requirements would not apply to the modified project. Unlike the EIR project, under the modified project, the existing residential building at 401 Cherry Street would be retained in its existing condition and would not be renovated. However, the new buildings within Blocks A, B, and C would achieve LEED Gold certification. Therefore, consistent with the EIR project, the modified project would not result in wasteful or inefficent energy use or conflict with state or local renewable energy plans. The modified project would not result in new significant energy impacts that were not previously identified in the 3700 California Street EIR, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

AGRICULTURE AND FORESTRY RESOURCES

As addressed in the 3700 California Street EIR, the project site is within an urbanized area that does not contain traditional or urban agricultural uses or forestlands. Furthermore, it is not zoned for such uses. Therefore, consistent with the EIR project findings, the modified project would have no impact on agricultural and forestry resources, and no mitigation measures are required.

Please refer to the following page for a summary of the conclusions of this addendum analysis.

Conclusion

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the final environmental impact report certified on February 27, 2020 remain valid and no supplemental environmental review is required. The proposed revisions to the project would not cause new significant impacts not identified in the EIR, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the modified project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this addendum pursuant to CEQA Guidelines section 15162.

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

Debra Dwyer for

Lisa Gibson
Environmental Review Officer

April 10, 2025

Date of Determination:

cc: Don Bragg, 3700 California Street LLC.
Jeff Horn, San Francisco Planning Department
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APPENDIX A: TRANSPORTATION MEMO (FEBRUARY 26, 2025)

FEHR PEERS

Memorandum

Date: February 26, 2025

To: Sherie George, San Francisco Planning Department

From: Neil Smolen, Matt Goyne, & John Holmes, Fehr & Peers

Subject: Final 3700 California Transportation Assessment Case No. 2017-003559ENV-02

SF24-1373

This memorandum documents a transportation analysis supporting an EIR addendum for the 3700 California Street project (Case No. 2017-003559ENV-02) in San Francisco, CA.

Background

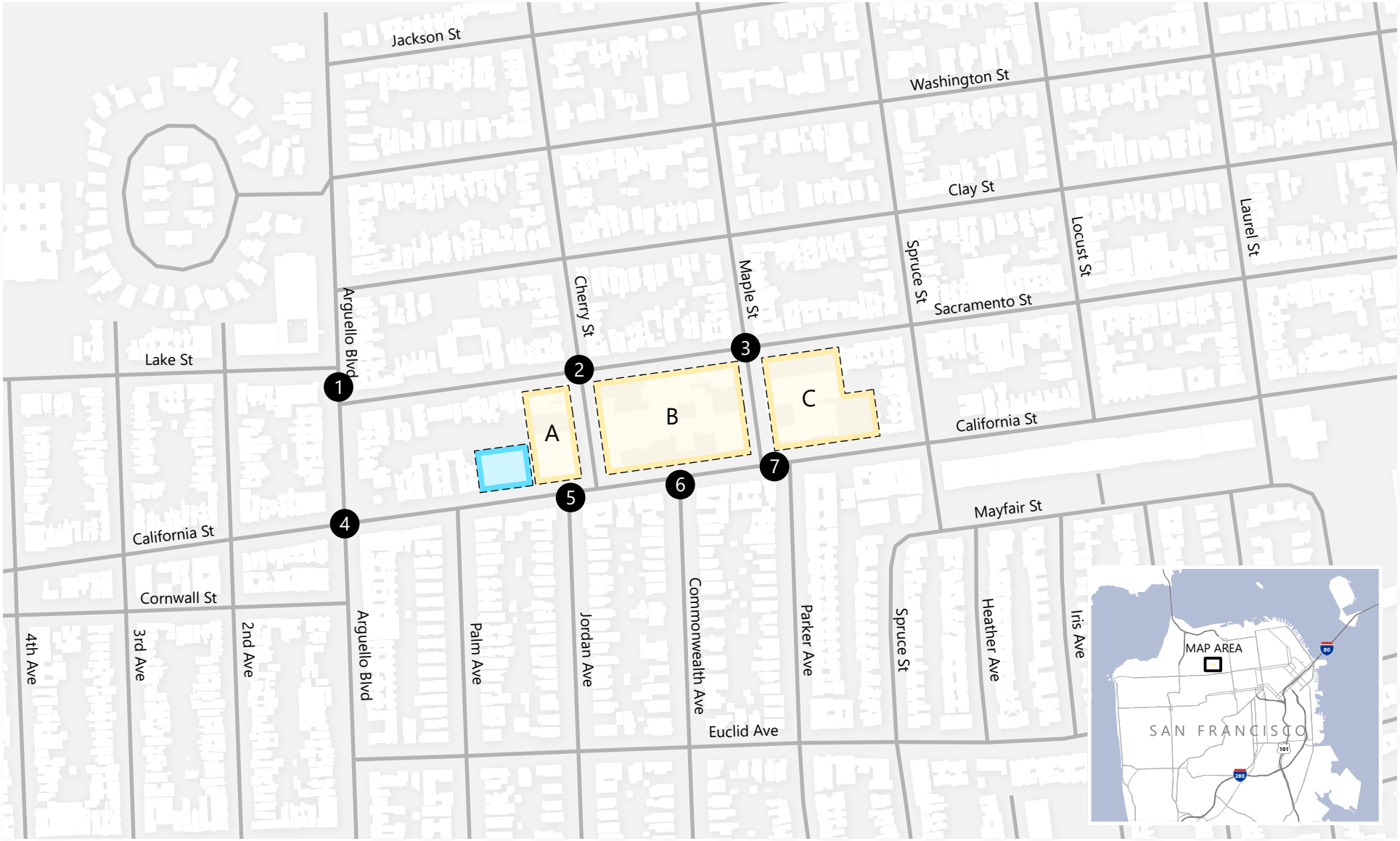
A transportation impact study was previously prepared by Fehr & Peers for the 3700 California Street Environmental Impact Report (Planning Department Case No. 2017-003559ENV, June 2019, herein referred to as the "2019 EIR") for a residential development and reuse project at the former California Pacific Medical Center (CPMC) California Campus at 3700 California Street (herein referred to as the "EIR project") in the Presidio Heights neighborhood of San Francisco. **Figure 1** shows the project site and surrounding area. In spring of 2024, the project sponsor submitted an application for a modified project (herein referred to as the "modified project").

Purpose and Summary

The memo compares:

1. The modified project's travel demand to the EIR project's travel demand as documented in the 2019 EIR, and
2. The modified project's transportation impacts to those of the EIR project as documented in the 2019 EIR.

In addition, this memorandum identifies changes to existing conditions and cumulative conditions since the 2019 EIR. As shown below, the modified project is estimated to result in more trips than the EIR project but would continue to result in a reduction in vehicle trips compared to the former hospital use, which was vacated in 2019. The modified project would not result in any new or substantially more severe significant transportation impacts compared to the EIR project.



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Study Intersection

Project Site

Existing Hospital (building to remain)

Figure 1

Project Location and Study Area

Changes to Existing Conditions Since 2019

The 2019 EIR describes conditions that existed at the time of the document's preparation and a description of baseline conditions. The following changes to the circulation network near the project site have occurred since the 2019 EIR:

- SFMTA installed the planned Rapid Rectangular Flashing Beacon (RRFB) at the existing crosswalk across the east leg of the California Street and Commonwealth Avenue intersection (this was considered under existing plus project conditions in the 2019 EIR).
- West of the study area, SFMTA completed the California Street Safety Project[1] from Arguello Boulevard to Park Presidio Boulevard that included a reduction from four to three vehicle travel lanes. The project also upgraded crosswalks, added daylighting, and implemented other safety improvements.
- East of the study area, SFMTA completed the 1 California Transit Lanes[2] to create permanent transit lanes on segments of the 1 California bus route between Presidio Avenue and Front Street along, with the exception of Clay Street between Stockton and Grant.
- East of the study area, SFMTA completed the Geary Rapid Project[3] (Phase 1 of Geary Corridor BRT) to extend transit only lanes from Gough Street west to Stanyan Street, add traffic signal priority for buses, and reconfigure stop locations with new transit bulb-outs and other amenities.
- SFMTA implemented Clay Slow Street on Clay Street between Arguello Boulevard and Steiner Streets [4] to create a safe, comfortable, low-vehicle-traffic route that prioritizes active transportation and community-building.

Project Characteristics

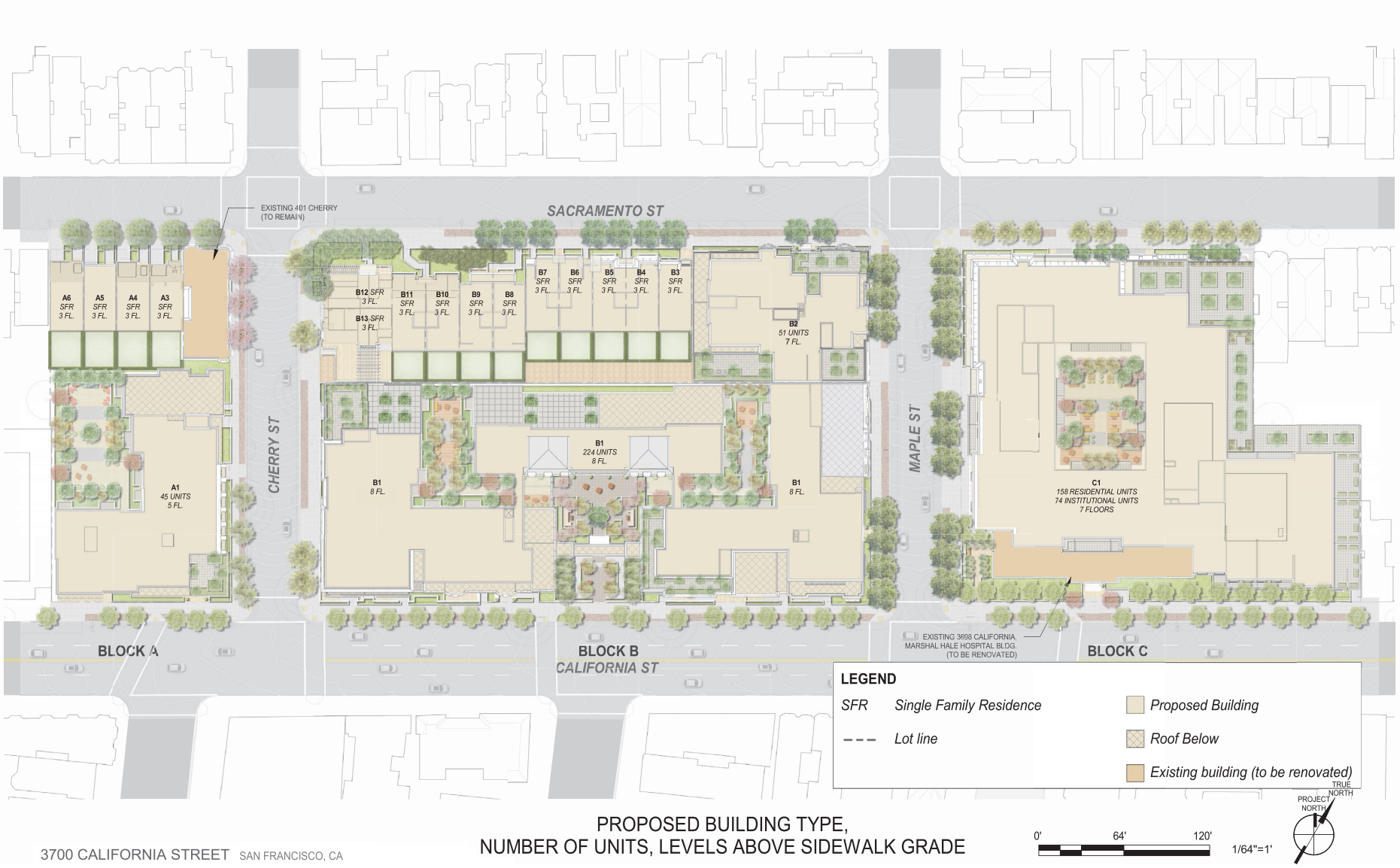
The project characteristics relevant to this transportation analysis are described below. **Figure 2** shows the modified project site plan.

Land Use Mix

Table 1 compares the modified project and EIR project's trip-generating land uses**.** The modified project includes 493 residential units, which is comprised of 15 single family units, 320 multifamily units, and 158 senior housing units. Additionally, the modified project includes 74 institutional units for assisted living and memory care and 4,810 square feet of restaurant uses. The modified project proposes 494 vehicle parking spaces (comprising 488 standard parking spaces and 6 car-

[1] https://www.sfmta.com/projects/california-street-safety-project
[2] https://www.sfmta.com/project-updates/1-california-transit-lanes-approved-become-permanent
[3] https://www.sfmta.com/projects/geary-rapid-project
[4] https://www.sfmta.com/projects/slow-streets-program

share spaces) and 244 Class 1 bike parking spaces to support the project land uses. Compared to the EIR project, the modified project would add about 61 residential units in addition to the (158 units of) senior housing, (74 units of) institutional housing, and restaurant components.



PROPOSED BUILDING TYPE,
NUMBER OF UNITS, LEVELS ABOVE SIDEWALK GRADE

3700 CALIFORNIA STREET SAN FRANCISCO, CA

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Figure 2

Project Site Plan

Table 1: Land Use Comparison between Approved and Modified Project

Land Use (Unit)	EIR Project	Modified Project	Difference (Modified – Approved)
Residential Units	273[1]	493[2]	+220
Single family / 4-Bedroom Townhome	*14*	*15*	*+1*
Multifamily	*259*	*320*	*+61*
Multifamily Studio	*13*	*39*	*+26*
Multifamily 1-Bedroom	*56*	*115*	*+59*
Multifamily 2-Bedroom	*88*	*150*	*+62*
Multifamily 3-Bedroom	*96*	*16*	*-80*
Multifamily 4-Bedroom	*6*	*0*	*-6*
Senior Housing Units	-	*158*	*+158*
Senior Studio	-	*10*	*+10*
Senior 1-Bedroom	-	*97*	*+97*
Senior 2-Bedroom	-	*51*	*+51*
Institutional Housing Units	-	74	+74
Institutional Studio	-	*39*	*+39*
Institutional 1-Bedroom	-	*23*	*+23*
Institutional 2-Bedroom	-	*12*	*+12*
Restaurant (square feet)	-	4,810	+4,810
Car Parking	416 spaces for residential use plus 5 car-share spaces	488 spaces for residential use plus 6 car-share spaces	
Bike Parking	411 Class 1 spaces 22 Class 2 spaces 13 cargo bikes spaces	244 Class 1 spaces 30 Class 2 spaces	
Loading	4 off-street loading spaces 11 on-street passenger (white) loading spaces	5 off-street loading spaces 9 on-street passenger (white) loading spaces 1 passenger porte-cochere	

Notes:
1. The EIR project proposed 264 new units along with the retention and renovation of the existing 9-unit building at 401 Cherry Street.
2. Not including the existing 9-unit 401 Cherry Street building (retained as is) and the 74 institutional housing units.

Sources: 3700 California Street EIR Final Report (Fehr & Peers, October 2019) and PUD/CU Submittal (Prado Group, March 8, 2024).

Curb Cuts

The EIR project included a total of 22 curb cuts[5]. The EIR project's driveways included one 10-foot-wide curb cut for each of the single-family homes and the following driveway and curb cut configurations for each block of multi-family garages:

- **Block A** – One driveway on California Street and one driveway on Cherry Street, each with two 10-foot-wide curb cuts to accommodate passenger vehicles only. [6]
- **Block B** – One driveway on Cherry Street and one driveway on Maple Street, each with a single 18-foot-wide driveway to accommodate passenger and freight vehicles.
- **Block C** – One driveway on Maple Street and one driveway on California Street, each with a single 18-foot-wide driveway to accommodate passenger and freight vehicles.

The modified project would provide 19 curb cuts, which is fewer curb cuts compared to the EIR project by consolidating single family curb cuts (for units facing primarily Sacramento Street) on Maple Street into shared garages where feasible. As shown on the November 2024 PUD/CU Submittal, the changes to curb cuts include the following:

- **Block A** – Provide the same driveway and curb cut configuration on California Street, remove one the two 10-foot multi-family curb cuts on Cherry Street, and remove one 10-foot single-family curb cut on Cherry Street. Sacramento Street curb cuts for single family homes would remain under the modified project.
- **Block B** – Provide similar 18-foot driveway and curb cuts on Cherry and Maple streets, while replacing the four single family curb cuts on Cherry Street with one consolidated driveway consisting of two 10-foot curb cuts. The driveway on Maple Street would move approximately 80 feet to the north compared to the EIR project.
- **Block C** – Provide two 18-foot driveways and curb cuts on Maple Street instead of one, remove one 18-foot driveways and curb cut on California Street, and add two 10-foot driveways for a port cochere on Sacramento Street.

The net result is fewer total curb cuts, with fewer curb cuts on California and Maple streets and additional curb cuts on Maple and Sacramento streets.

Loading

The EIR project included four off-street freight loading spaces within Blocks B and C for the proposed multi-family residential units. Access to the three freight loading spaces in the center of

[5] The 2019 EIR referred to each of the passenger multi-family driveways that had two 10-foot curb cuts as one curb cut, since they were generally replacing one larger uninterrupted curb cut. On the plans for the EIR project, the total number of curb cuts was shown as 22, including two 10-foot curb cuts for the five multi-family driveways.

[6] Curb-cut widths include both the driveway width and the 18-inch wings on either side of each driveway, per the recommended practices presented in the City of San Francisco's Better Streets Plan.

Block B would have been provided via the one-way route for trucks entering from Cherry Street and exiting to Maple Street. Freight loading at the space in Block C would have been provided via a one-way route from the loading-only driveway on California Street to the Maple Street exit. All four of the off-street freight loading spaces would have met the minimum size requirement of 35 feet by 12 feet wide and the minimum vertical clearance requirement, including entry and exit, of 14 feet.

The modified project proposes five off-street freight loading spaces.[7] Access to the two Block C loading spaces under the modified project would be provided via a dedicated bidirectional driveway on Maple Street as shown on page A-C.50 of the November 1, 2024 PUD/CU Submittal in **Attachment A**. Access to the three loading spaces in Blocks A and B would be provided through the multi-family residential driveways.

The modified project provides nine passenger loading zones (white curbs) distributed along the project frontages. The modified project also includes an on-site passenger loading space via a porte-cochere in Block C. The modified project does not propose curb changes to the existing 33 Ashbury/18th bus zone on Sacramento Street (red curb – no parking).

Parking

On-Street Parking

There are 84 existing on-street parking spaces adjacent to the project site. Of these 84 spaces, 57 are standard parallel spaces, 24 are perpendicular spaces, and 3 are reserved for ADA.

With the EIR project, there would be 58 on-street parking spaces. With the modified project, there would be 66 on-street parking spaces, which results in an increase of eight on-street parking spaces.

Off-Street Parking

The EIR project included 416 residential off-street parking spaces for automobiles in a multi-level garage, open 24 hours a day and seven days a week. The modified project proposes to increase the number of off-street parking spaces to 488 off-street parking spaces in four separate multi-level garages and independently accessible parking garages for the single-family homes. Of the 488 total off-street parking spaces, 458 off-street parking spaces would be available for the multi-family units. While the modified project increases the overall parking count, the parking ratio for the multi-family units in the EIR project was 1.5 spaces per unit, compared to 0.96 spaces per unit in the modified project.

[7] Of the five off-street freight loading spaces, two located in C1 building satisfy the dimensional requirements under Planning Code and three in A1, B1, and B2 are slightly smaller. A PUD exception is being requested for the three smaller loading spaces.

Construction

The EIR project assumed a total construction duration of approximately 49 months, which included three distinct and overlapping phases. Construction was assumed to occur between 7:00 AM to 8:00 PM, up to seven days a week. The modified project has an expected construction duration of between 35-40 months, with a 40-month duration assuming some phasing.

Travel Demand

Travel demand refers to vehicle, transit, pedestrian, and bicycle trips generated by the project. The EIR project's travel demand was evaluated in the 2019 EIR using the City's 2002 Transportation Impact Analysis Guidelines (2002 TIA). The 2002 TIA were replaced with the City's 2019 TIA Guidelines, upon which the modified project's travel demand is based.[8] The 2002 TIA Guidelines were based on Citywide Travel Behavior Surveys from the 1980s through the 2000s as well as Institute of Transportation Engineers (ITE) trip generation rates, which are generally more reflective of suburban conditions. As a result, the 2002 TIA Guidelines estimated more vehicle trips and are generally more conservative than the 2019 TIA Guidelines. The 2019 TIA Guidelines are based on data collected at various locations within the City in 2017, which more accurately reflects the number of trips made by modes other than driving, resulting in fewer estimated vehicle trips.

For the residential and restaurant components of the modified project, travel demand was calculated based on the 2019 TIA Guidelines. Travel demand for the senior housing and assisted living components of the modified project is calculated based on the Institute of Transportation Engineers' (ITE) *Trip Generation Handbook*, 11th edition. A comparison of the number of vehicle trips generated by the EIR project and modified project is at the end of the below trip generation section.

Trip Generation

Table 2 shows the person trip generation estimates for the modified project by land use. Since the restaurant operator is uncertain at this time, the project's restaurant use was analyzed as a composite restaurant use (per categorization in the San Francisco 2019 TIA Guidelines) to conservatively assume the highest potential level of trip generation for this land use.

[8] For more information on this topic, refer to 3333 California Street Mixed-Use Project (Case No 2015-014028ENV) Response to Comments Document dated 08.22.19, Master Response-Transportation & Circulation pgs. 4-1-4.16.

Table 2: Person Trip Generation Modified Project

Land Use	Quantity	Unit	Trip Rates		Person Trips	
			Daily	PM Peak Hour	Daily	PM Peak Hour
General Residential	561[1]	Bedrooms	4.48	0.40	2,514	224
Senior Housing[2]	158	Units	3.24	0.03	512	5
Institutional Housing[3]	74[1]	Bedrooms	2.60	0.33	192	24
Restaurant (Composite)	4.81	1,000 sq ft	597.09	80.67	2,872	388
Total Person Trips					6,090	641

Note:

1. Calculated by multiplying the number of units by the number of bedrooms in that category (studio/1-bedroom unit = multiplier of 1; 2-bedroom unit = multiplier of 2; 3-bedroom or more = multiplier of 3).
2. Calculated using ITE Land Use 252 – Senior Adult Housing – Multifamily. The Dense Urban setting was not available, so the analysis uses trip generation rates for the General Urban/Suburban setting.
3. Calculated using ITE Land Use 254 – Assisted Living. The Dense Urban setting was not available, so the analysis uses trip generation rates for the General Urban/Suburban setting.

Sources: San Francisco Planning 2019 TIA Guidelines; Institute of Transportation Engineers' *Trip Generation Handbook*, 11th edition

Mode Split

Table 3 and **Table 4** show the mode split and vehicle trips estimated from the modified project's person trip generation. The modified project is expected to generate 1,913 daily vehicle trips and 159 PM peak hour vehicle trips, also disaggregated from the daily and PM peak hour auto and TNC/Taxi person trips by the modified project.

Table 3: Person Trips by Mode

Person Trip Mode	Modified Project Daily Person Trips	Modified Project PM Peak Hour Person Trips
Auto	2,434	217
Taxi / TNC	129	13
Public Transit	820	89
Walk	2,528	301
Bike	179	20
Total Person Trips	**6,090**	**640**

Sources: 3700 California Street EIR Final Report (Fehr & Peers, October 2019), Prado Group (2024), San Francisco Planning 2019 TIA Guidelines, Appendix F: Travel Demand, Fehr & Peers 2024

Table 4: Vehicle Trips by Mode[1]

Vehicle Trip Mode	Modified Project Daily Vehicle Trips	Modified Project PM Peak Hour Vehicle Trips
Auto	1,829	151
Taxi / TNC	84	9
Total Vehicle Trips	**1,913**	**166**

Note:
1. Calculated by dividing person trips by average vehicle occupancy rates. For this project, the San Francisco Planning 2019 TIA Guidelines assumes average vehicle occupancy rates of 1.3 or 1.4 depending on the origin and destination of a trip.

Sources: 3700 California Street EIR Final Report (Fehr & Peers, October 2019), Prado Group (2024), San Francisco Planning 2019 TIA Guidelines, Appendix F: Travel Demand, Fehr & Peers 2024

Table 5 compares the modified project's vehicle trips to those of the EIR project, both accounting for the trip credit from the CPMC land uses. The EIR project generated approximately 1,389 daily vehicle trips and 240 PM peak hour vehicle trips. The modified project would generate 1,913 daily vehicle trips and 166 PM peak hour vehicle trips. The modified project's land uses and application of the newer trip generation rates would result in an increase of 524 daily vehicle trips and a reduction of 81 PM peak hour vehicle trips compared to the EIR project. When compared to the trip generation of the CPMC land uses, the modified project would result in net reductions of 4,349 daily vehicle trips and 448 PM peak hour vehicle trips.

Table 3: Vehicle Trip Generation

Land Use	Quantity	Unit	Vehicle Trip Rates		Vehicle Trips	
			Daily	PM Peak Hour	Daily	PM Peak Hour
EIR Project						
Project Vehicle Trips					1,389	240
CPMC Vehicle Trip Credit[1]					-6,262	-607
Net New Vehicle Trips					-4,873	-367
Modified Project						
General Residential	561[2]	Bedrooms	1.25	0.11	699	61
Senior Housing	158	Units	3.24	0.03	512	5
Institutional Housing	74[2]	Bedrooms	2.60	0.33	192	24
Restaurant (Composite)	4.81	1,000 sq ft	106.03	14.35	510	69
Total Vehicle Trips					1,913	159
Net New Vehicle Trips (Modified Project – Existing CPMC Uses)					-4,349	-448
Difference (Modified – Approved)					**524**	**-81**

Note:
1. Operating uses present on the project site at the time of the 2019 EIR analysis were applied as a credit to the EIR project trip generation. Existing Trips Credit trips were subtracted from the Project Total Trips to get the Net New Total Trips.
2. Calculated by multiplying the number of units by the number of bedrooms in that category (studio/1-bedroom unit = multiplier of 1; 2-bedroom unit = multiplier of 2; 3-bedroom or more = multiplier of 3).

Sources: 3700 California Street EIR Final Report (Fehr & Peers, October 2019), Prado Group (2024), San Francisco Planning 2019 TIA Guidelines, Appendix F: Travel Demand, Fehr & Peers 2024

Trip Distribution

Table 6 shows the vehicle trips disaggregated by inbound or outbound directionality. The auto trips are assumed to use the project driveways, and the Taxi/TNC trips are assumed to use the passenger loading zones throughout the project site. The PM peak hour vehicle trips were further distributed by common origins and destinations. **Table 7** summarizes the inbound and outbound modified project trips distribution among nine San Francisco districts, East Bay, North Bay, and South Bay for the PM peak hour. The trip distribution between the EIR project and modified

project cannot be compared directly given the differences in methodology and geographies between the 2002 and the 2019 TIA Guidelines and therefore these tables omit the EIR project information.

Table 4: Modified Project Vehicle Trips Directionality

Mode	Daily			PM Peak Hour		
	Inbound	Outbound	Total	Inbound	Outbound	Total
Auto	913	916	1,829	86	64	150
Taxi / TNC	42	42	84	5	4	9
Total	**955**	**958**	**1,913**	**91**	**68**	**159**

Source: San Francisco Planning 2019 TIA Guidelines, Appendix F: Travel Demand

Table 5: Modified Project PM Peak Hour Vehicle Trips Distribution

Geographic Place	Total	Inbound	Outbound
Downtown/North Beach	7	3	4
SoMa	8	8	0
Marina/Western Market	41	29	12
Mission/Potrero	2	0	2
Outer Mission/Hills	8	4	4
Bayshore	0	0	0
Richmond	48	27	21
Sunset	16	7	9
Islands	0	0	0
South Bay	14	12	2
East Bay	7	2	5
North Bay	8	3	5
Total	**159**	**95**	**64**

Source: San Francisco Planning 2019 TIA Guidelines, Appendix F: Travel Demand

Trip Assignment

Vehicles trips were assigned to the roadway network to develop turning movement volumes at the study intersections. The modified project results in lower turning movement volumes during the PM peak hour relative to the EIR project, which is a result of the modified project's lower PM

peak hour vehicle trip generation. **Attachment B** contains the study intersection volumes including the project vehicle trips.

Freight and Passenger Loading Demand

Freight and passenger loading demand for the EIR project was calculated based on the 2002 TIA Guidelines, which assessed passenger loading demand through allocation of "other" net new person trips (i.e., trips made by bicycle, motorcycle, or taxi/TNC) and allocation of proposed project's on-street passenger loading spaces. Using this methodology, the EIR project required one freight loading space and seven passenger loading spaces to meet the peak hour demand.

Freight and passenger loading demand for the modified project was calculated based on the 2019 TIA Guidelines. Per the 2019 TIA Guidelines, calculated loading demand is rounded up to the nearest whole integer, equivalent to the number of required loading spaces. For passenger loading demand, the 2019 TIA Guidelines state that for projects consisting of more than one building, passenger loading demand should be calculated for the lobby entrance at each individual building.

Since the 2019 TIA Guidelines passenger loading demand does not include a category for restaurant uses, passenger loading demand estimates for the restaurant space were calculated using retail rates. Freight loading demand estimates are summarized in **Table 8** and passenger loading demand estimates are summarized in **Table 9**.

Table 6: Peak Hour Freight Loading Demand

Land Use	KSF	Rate per KSF	Spaces per KSF[1]	Peak Hour Loading Spaces[2]
EIR Project				
Total Spaces (rounded)				**1**
Modified Project				
Total Residential	577.415	0.03	0.002	1.002
Restaurant	4.81	3.6	0.208	1.002
Total Spaces				2.004
Total Spaces (rounded)				**3**

Notes:

1. Freight and delivery peak hour loading spaces per KSF calculation: $\frac{\left[\frac{(1.25)(Rate\ per\ KSF)}{9}\right]}{2.4}$
2. Freight and delivery peak hour loading spaces demand calculation: $KSF * Spaces\ per\ KSF$

Sources: 3700 California Street EIR Final Report (Fehr & Peers, October 2019), Prado Group (2024), San Francisco Planning 2019 TIA Guidelines, Appendix F: Travel Demand, Fehr & Peers 2024

The 2019 TIA Guidelines updated the passenger loading methodology to account for loading demand at each building within a project, rather than one calculation for the entire project. **Table 9** summarizes the modified project's loading demand according to the updated methodology.

Table 7: Passenger Loading Demand

Land Use (Geography)	PM Peak Hour Person Trips[1]	Passenger Loading %	Peak Hour Loading Spaces[2]	Peak 15-Min Loading Spaces[3]
EIR Project[4]				
Total Spaces			**7**	**1-2**[4]
Modified Project				
Building A1	25	7.20%	0.032	0.065
Building A1 (rounded)			**1**	**1**
Building B1	138	7.20%	0.166	0.331
Building B1 (rounded)			**1**	**1**
Building B2	36	7.20%	0.042	0.084
Building B2 (rounded)			**1**	**1**
Building C1	34	7.20%	0.035	0.070
Building C1 (rounded)			**1**	**1**
Single Family Residences	24	7.20%	0.029	0.058
Single Family Residences (rounded)			**1**	**1**
Restaurant (Retail)	388	3.00%	0.194	0.388
Restaurant (rounded)			**1**	**1**
Total Spaces (rounded)			**6**	**6**

Notes:
N/A = Some calculation methods are different between the 2002 TIA Guidelines and 2019 TIA Guidelines so these metrics cannot be directly compared.

1. Person trips estimated for each use. The sum of residential and retail space person trips (898 person trips) is equal to the total person trips in Table 2.
2. Peak hour passenger loading spaces demand calculation: $\frac{Person\ Trips * Passenger\ Loading\ \% * 1\ minute\ average\ stop\ duration}{60}$
3. Peak 15-min passenger loading spaces demand calculation: $\frac{\left(\frac{Person\ Trips * Passenger\ Loading\ \%}{2}\right) * 1\ minute\ average\ stop\ duartion}{15}$
4. The EIR project assessed passenger loading demand based on the 2002 TIA Guidelines, which assessed passenger loading demand through allocation of "other" net new person trips (i.e., trips made by bicycle, motorcycle, or taxi/TNC) and total number of on-street passenger loading spaces. The 2019 EIR states that "under the conservative assumption that all new "other" trips are passenger loading trips, the proposed project would result in approximately one new passenger loading trip every 10 minutes during the peak hour." Therefore, 1-2 passenger loading activities presented in the peak 15-minute column for comparison purposes to the modified project. This methodology differs from the 2019 TIA Guidelines, which the modified project used to determine passenger loading demand.

Sources: 3700 California Street EIR Final Report (Fehr & Peers, October 2019), Prado Group (2024), San Francisco Planning 2019 TIA Guidelines, Appendix F: Travel Demand, Fehr & Peers 2024

The modified project's anticipated freight demand is three freight loading spaces during the peak hour; this is two more than the demand for the EIR project. The modified project demand is at

least 6 passenger loading spaces to meet the peak 15-minute period and six spaces to meet the peak hour period demand. Therefore, there is more demand for passenger loading spaces than was identified for the EIR project. Refer to text above for a description of the changes in methodology for calculating loading demand between the EIR project and the modified project.

Impact Evaluation

This section discusses the modified project's transportation impacts in comparison to the transportation impacts associated with the EIR project. **Table 10** summarizes the most substantial differences between the 2002 TIA Guidelines and the 2019 TIA Guidelines.

Table 8: 2002 and 2019 TIA Guidelines Comparison

Topic	2002 TIA Guidelines (EIR Project)	2019 TIA Guidelines (Modified Project)
Potentially Hazardous Conditions	Evaluated separately for pedestrian, bicycle, and driving hazards. It also considered substantial overcrowding on public sidewalks	The impacts to potentially hazardous conditions for people walking, bicycling, riding transit, and driving are consolidated into an assessment of the effect of the project on potentially hazardous conditions, including capacity-related impacts that could result in potentially hazardous conditions.
Transit Impact Evaluation	The following were prepared for the EIR project: - Transit Capacity Analysis - Transit Operations Analysis	The planning department removed the evaluation of transit capacity from CEQA to be consistent with state guidance about not treating addition of new uses as an adverse impact and to reflect funding sources for and policies that encourage additional ridership.
Driveway and Loading Operations Plan (DLOP)	Evaluated as part of freight and passenger loading, concluding no mitigation is necessary.	Not required for the modified project because of the project's location, per SF Planning Code, Section 155 (u).

Sources: 3700 California Street EIR Final Report (Fehr & Peers, 2019), San Francisco Planning 2019 TIA Guidelines Appendix I: Public Transit, and San Francisco Planning Code.

Significance Criteria

San Francisco Administrative Code chapter 31 directs the planning department to identify environmental effects of a project using the environmental checklist form set forth in CEQA Guidelines Appendix G as the base checklist. As relates to transportation and circulation, Appendix G asks whether the modified project would:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;
- Conflict or be inconsistent with CEQA Guidelines section 15064.3(b), which pertains to VMT;
- Substantially increase potentially hazardous conditions due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); and
- Result in inadequate emergency access.

The planning department uses the significance criteria below to facilitate the transportation analysis and address the Appendix G checklist. The planning department separates the significance criteria into construction and operation phases as both phases are required to be addressed in CEQA.

Construction

Construction of the modified project would have a significant effect on the environment if it would require a substantially extended duration or intense activity; and the effects would create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling or substantially delay public transit.

Operations

The operational impact analysis addresses the following six significance criteria. The modified project would have a significant effect if it would:

- Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations
- Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access
- Substantially delay public transit
- Cause substantial additional VMT or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network
- Result in a loading deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit
- Result in a substantial vehicular parking deficit and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit.

Existing Plus Project Conditions

This section presents the impact findings in the 2019 EIR project, discusses how the impact findings for modified project would compare to those findings, and determines whether the modified project would result in either any new significant impacts or substantially more severe significant impacts than previously identified in the 2019 EIR project analysis.

Construction

2019 EIR Project Analysis

The 2019 EIR identified that construction-related activities for the EIR project would have a less-than-significant impact on transportation, and no mitigation measures are necessary. However, the 2019 EIR identified that Improvement Measure, I-TR-1A, Project Construction Updates, would further reduce the less-than-significant construction impacts on nearby residents, institutions, and businesses.

> Improvement Measure I-TR-A: Project Construction Updates
>
> To minimize construction impacts on access for nearby residences, institutions, and businesses, the project sponsor should provide nearby residences and adjacent businesses with regularly updated information regarding construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel or parking lane closures, and sidewalk closures through a newsletter and/or website.

2024 Modified Project Analysis

The modified project's construction activities would be similar to those analyzed under the EIR project. Similar to the EIR project, construction activities of the modified project would comply with San Francisco Noise Ordinance and Department of Building Inspection permit provisions. The majority of construction activity is expected to occur from 7:00 AM to 8:00 PM Monday through Friday, up to seven days a week, as needed. The number of daily trucks and construction workers for the modified project would be similar to those of the EIR project. The hauling and construction truck routes and construction staging (primarily within the project site with potential sidewalk closures) would be the same as the EIR project.

Construction activities would take place over a period of approximately 35 to 40 months, with a 40-month duration assuming some phasing. Similar to the EIR project, the modified project would have temporary transportation impacts related to street closures, route changes, and temporary bus stop relocations. The project sponsor would follow the applicable SF Public Works orders to maintain safe access in and around the construction site as well as the Regulations for Working in San Francisco Streets ("The Blue Book"). The sponsor would also reimburse SFMTA for installation and removal of temporary striping and signage changes required during project construction.

The San Francisco Planning Department published a memorandum on October 27, 2021 clarifying the role of mitigation measures in construction CEQA impact analyses. The memorandum concluded that with the improved understanding of existing city regulations that typically would reduce transportation-related construction impacts to less-than-significant levels under CEQA, the transportation-related construction significant and unavoidable impacts with mitigation identified in various documents would be reduced to less-than-significant levels.[9] Therefore, the modified project construction activities, in compliance with existing city regulations, are expected to result in a **less-than-significant** impact.

Mitigation: None required. The modified project would comply with Improvement Measure I-TR-1A: Project Construction Updates identified in the 2019 EIR.

Potentially Hazardous Conditions and Accessibility

2019 EIR Project Analysis

The 2019 EIR identified that the EIR project would result in less-than-significant impacts related to potentially hazardous conditions and accessibility. Although traffic hazard impacts would be less than significant, Improvement Measure I-TR-3B, Monitoring and Abatement of Queues, would further reduce the less-than-significant impacts with respect to automobile traffic in the project vicinity, specifically, on Maple Street. The recommended improvement measure is described below.

> Improvement Measure I-TR-3B: Monitoring and Abatement of Queues
>
> A vehicle queue is defined as one or more vehicles blocking any portion of adjacent right-of-way, including sidewalks or public travel lanes for a consecutive period of 3 minutes or longer on a daily and/or weekly basis. It will be the responsibility of the project sponsor to ensure that recurring vehicle queues or vehicle conflicts do not occur adjacent to the project site. If recurring queueing occurs, the owner/operator of the facility will employ abatement methods as needed to abate the queue. Appropriate abatement methods would vary, depending on the characteristics and causes of the recurring queue as well as the characteristics of the parking and loading facility, the street(s) to which the facility connects, and the associated land uses (if applicable).
>
> Suggested abatement methods include, but are not limited to, the following: redesign of facility to improve vehicle circulation and/or onsite queue capacity; ingress/egress restrictions, such right-in/right-out access limitations; employment of parking attendants

[9] *Memorandum Certain Transportation-Related Construction Management Mitigation Measures* (October 27, 2021) San Francisco Planning Department.

to facilitate parking lot ingress and egress; providing loading attendant(s); coordinating with for-hire vehicles; coordinating loading activities; and additional TDM strategies.

If the planning director, or their designer, determines that a recurring queue or conflict may be present, the planning department will notify the project sponsor in writing. Upon request, the owner/operator will hire a qualified transportation consultant to evaluate the conditions at the site for no less than 7 days. The consultant will prepare a monitoring report to be submitted to the planning department for review. If the planning department determines that a recurring queue or conflict does exist, the project sponsor will have 90 days from the date of the written determination to abate the recurring queue or conflict.

2024 Modified Project Analysis

The modified project would result in approximately 81 fewer PM peak hour trips than the EIR project and 448 fewer PM peak hour trips than the CPMC land uses. Although the modified project would result in an increase of 524 daily trips compared to the EIR project, the modified project would generate 4,349 fewer daily trips than the CPMC land uses. Furthermore, the modified project's driveway throat length is sufficient to provide off-street storage to avoid project site queueing onto adjacent streets. The modified project provides fewer curb cuts and removes a curb cut from the busiest street (California Street), therefore reducing the number of conflict points between people driving and walking, bicycling, and riding transit. The driveway locations are in nearly identical locations as those analyzed in the 2019 EIR project except for the project driveway on the west side of Maple Street, which shifted north approximately 100 feet but remains approximately 80 feet from the nearest intersection, would be free of visual obstructions, and maintains adequate sight distance from the corner.[10] Therefore, the modified project would also have **less-than-significant** impacts related to potentially hazardous conditions and accessibility.

Mitigation: None required. The modified project would comply with Improvement Measure I-TR-3B: Monitoring and Abatement of Queues identified in the 2019 EIR.

Public Transit

2019 EIR Project Analysis

The 2019 EIR identified that the EIR project would not cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity or cause a substantial increase in delays or operating costs such that significant adverse impacts on transit could result. Therefore, the 2019 EIR identified a less-than-significant impact on transit.

[10] Assembly Bill 413 (the "Daylighting Law") prohibits on-street parking within 20 feet of any intersection or crosswalk.

2024 Modified Project Analysis

The modified project is estimated to result in 81 fewer PM peak hour vehicle trips than the EIR project, or 199 PM peak hour person trips. The 2019 TIA Guidelines set forth a screening criterion for projects that would typically not result in significant public transit delay in comparison to existing conditions. In general, projects that generate fewer than 300 PM peak hour vehicle trips would have a less than significant transit delay impact. Therefore, the modified project meets the screening criterion, and the modified project would result in a **less-than-significant** transit delay impact.

Mitigation: None required.

Vehicle Miles Traveled (VMT)

2019 EIR Project Analysis

The 2019 EIR concluded that, based on available data, the EIR project would not generate VMT per capita at a level that would cause a significant impact based on the project Transportation Analysis Zones (TAZs) generating an average VMT per capita of 7.7-7.9, which is substantially lower than the significance threshold of 15 percent below the regional average of 14.6. Therefore, impacts on VMT due to the EIR project would be less than significant, and no mitigation measures are necessary.

2024 Modified Project Analysis

The modified project would be located at the same site as analyzed in the 2019 EIR. The average daily VMT per capita or per employee for the TAZs meet the map-based screening for residential, institutional, and retail/restaurant uses proposed as follows.

Based on these characteristics, the modified project would generate an average VMT per capita of 7.8 for residential uses. The modified project's restaurant component is anticipated to serve local patrons and would generate an average VMT per capita of 9.39, which is also substantially lower than 15 percent below the regional average. The modified project proposes a parking ratio of 0.96 stalls per residential unit, which is an increase in vehicle parking compared to the EIR project but in compliance with planning code. The modified project does not propose any vehicle parking for the restaurant use.

Therefore, the modified project would also have **less-than-significant** impacts related to vehicle miles traveled.

Mitigation: None required.

Loading

2019 EIR Project Analysis

The 2019 EIR identified that the EIR project would generate three fewer freight vehicle loading instances during the peak hour compared to the CPMC hospital (demand for one freight loading space compared to four). The 2019 EIR also identified that the EIR project's loading supply would exceed freight and passenger loading demand during the peak hour of loading activities. Therefore, the proposed project would have a less-than-significant impact on freight and passenger loading, and no mitigation measures are necessary.

2024 Modified Project Analysis

The modified project is estimated to provide sufficient freight and passenger loading supply for the estimated peak demand.

Freight Loading: The modified project would generate peak hour freight loading demand of three freight loading spaces. The modified project would provide a total of five freight loading spaces: one in each of the multi-family buildings (A1, B1, and B2) and two in the senior housing building (C1). Therefore, the modified project's freight loading supply would meet the estimated commercial vehicle and smaller service vehicle loading demand.

Passenger Loading: The modified project requires at least six passenger loading spaces to meet the peak 15-minute loading demand in the PM period. The modified project includes nine passenger loading zones (white curbs) distributed along the project frontages. The modified project also includes an on-site passenger loading space via a porte-cochere in Block C. Therefore, the on-street loading zones and porte-cochere would be sufficient to meet the estimated peak passenger loading demand for the modified project.

The modified project meets the loading demand through on- and off-street loading spaces and would not result in significant freight or passenger loading impacts. Therefore, the modified project is expected to result in **less-than-significant** impact to loading.

Mitigation: None required.

Cumulative Conditions Plus Project Conditions

This section identifies the cumulative conditions (aka cumulative setting), presents the findings of the 2019 EIR's cumulative impact analysis, discusses how the impact findings for the modified project would compare to those findings, and determines whether the modified project would result in any new or substantially more severe significant cumulative impacts than previously identified in the 2019 EIR.

Cumulative Setting

CEQA Guidelines section 15130(b)(1) provides two methods for cumulative impact analysis: the "projections-based approach" and "list-based approach." This memo employs both approaches, depending on which approach best suits the resource topic being analyzed.

Projections-Based Approach

In general, a projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This project is consistent in projections approach used for 3700 EIR (CHAMP) but is updated for 2050 Conditions.

List-Based Approach

In general, the list-based approach uses a list of projects producing closely related impacts that could combine with those of a proposed project to evaluate whether the project would have a potential significant cumulative impact. This EIR addendum uses a list-based approach for certain topics (i.e., construction, potentially hazardous conditions and accessibility, loading) to evaluate the potential for cumulative impacts. **Table 11** identifies cumulative development and transportation projects within 0.25 miles of the project area.

Table 11: Cumulative Projects List

Project	Description
Development Projects	
3333 California Street (Case No: 2015-014028ENV)	The 10.25-acre project site is currently developed with a four-story, 455,000-square-foot office building; a below-grade parking garage; a one-story annex building; three surface parking lots; two circular garage ramp structures; and landscaping. The existing office building would be partially demolished and expanded to include new levels. The mixed-use project would include the following uses, depending on the variant: 558 to 744 residential dwelling units in 15 buildings, 0 to 49,999 square feet of office space, 48,593 to 54,117 square feet of retail space, a 14,690-square-foot childcare center, 895 to 971 parking spaces, and 236,000 square feet of open areas. Project first approved by Planning September 2019 with modification in October 2024; No active building permits issued.
3637–3657 Sacramento Street (Case No. 2007.1347E)	This project consists of the demolition of three existing one- to three-story buildings and the construction of a new 40-foot-tall four-story mixed-use building containing 18 dwelling units, 6,500 square feet of retail use, 10,000 square feet of medical office use, and 64 vehicle parking spaces. Project first approved by Planning Department November 2018 with modification in April 2024; Building permits issued.
Transportation Projects	
Muni Forward[1]	• Outreach for the 1-California line Muni Forward project is set to begin in 2025
Geary Boulevard Improvement Project[2]	• Extension of transit-only lanes from Stanyan Street west to 34th Avenue. • Traffic signal priority for buses. • Reconfigured stop locations and upgraded transit stops from Stanyan Street to 34th Avenue, with transit bulb-outs, new amenities, and crossing improvements for people walking.
Arguello Safety Project	• This project will review and potentially propose bikeways separated from motor vehicle traffic, or protected bikeways. Protected bikeways are bicycle facilities that are separated from traffic by parked cars, safe-hit posts, transit islands or other physical barriers. The addition of protective elements will increase safety for people bicycling on the street. Arguello Safety Project | SFMTA

Notes:

1. Based on information presented for these routes at https://www.sfmta.com/projects/muni-forward; accessed by Fehr & Peers, December 11, 2024.
2. SFMTA board approved the proposed street changes on August 15, 2023. More information is available at https://www.sfmta.com/projects/geary-boulevard-improvement-project; accessed by Fehr & Peers, December 11, 2024.

Construction

2019 EIR Project Analysis

The 2019 EIR concluded that construction activities associated with the EIR project and the projects listed in **Table 11** would be temporary and limited in duration and conducted in accordance with City requirements to maintain safe access in and around the site. The 2019 EIR determined that other reasonably foreseeable future developments outside of the 0.25-mile radius are located far enough from the EIR project such that the project would not contribute considerably to other cumulative construction impacts. Therefore, the EIR project, in combination with reasonably foreseeable developments in the general area, would result in less-than-significant cumulative construction-related transportation impacts, and no mitigation measures are necessary. The EIR project would implement Improvement Measure I-TR-1 A to further reduce its less-than-significant contribution to cumulative construction-related impacts.

2024 Modified Project Analysis

The modified project's construction activities would be similar to those analyzed in the 2019 EIR. Therefore, the modified project construction activities, in compliance with existing city regulations, are expected to result in a **less-than-significant** impact.

Mitigation: None required. The modified project would comply with Improvement Measure I-TR-1A: Project Construction Updates identified in the 2019 EIR.

Potentially Hazardous Conditions and Accessibility

2019 EIR Project Analysis

The 2019 EIR determined that the street changes proposed by cumulative projects would be consistent with City policies and design standards, and the additional vehicle trips due to anticipated growth would not result in significant cumulative impacts related to hazardous conditions and access. Furthermore, the 2019 EIR determined that other reasonably foreseeable future developments are located far enough from the EIR project such that the project would not contribute considerably to other cumulative impacts related to hazardous conditions or accessibility. Therefore, the EIR project, in combination with reasonably foreseeable development projects, would result in a less-than-significant cumulative traffic hazard impact.

2024 Modified Project Analysis

As described under existing plus project conditions, the modified project would result in fewer vehicle trips on the transportation network than analyzed in the EIR and the site plan has more driveway and garage ramp throat storage than the EIR project and thus would not result in on-site vehicle queues extending back into the public right-of-way. The modified project would also

result in **less-than-significant** cumulative impacts related to potentially hazardous conditions and accessibility.

Mitigation: None required.

Public Transit

2019 EIR Project Analysis

The 2019 EIR concluded that the EIR project would reduce the number of trips on regional transit slightly through replacement of the existing CPMC hospital with residential land uses at the site. The 2040 cumulative conditions also include the CPMC Cathedral Hill hospital, consistent with the 2010 CPMC EIR. Therefore, the EIR project would not combine with other projects to result in cumulative impacts on regional transit capacity and no mitigation is required.

2024 Modified Project Analysis

The modified project would result in 81 fewer PM peak hour vehicle trips than the EIR project, or 199 PM peak hour person trips. The 2019 TIA Guidelines set forth a screening criterion for projects that would typically not result in significant public transit delay in comparison to existing conditions. In general, projects that generate fewer than 300 PM peak hour vehicle trips would have a less than significant transit delay impact. Therefore, the modified project meets the screening criterion, and the modified project would result in a **less-than-significant** transit delay impact.

Mitigation: None required.

Vehicle Miles Traveled

2019 EIR Project Analysis

The 2019 EIR concluded that there are no roadway capacity-enhancing projects adjacent to the project site that would encourage higher levels of VMT under cumulative conditions. The project's 2040 VMT per capita is anticipated to be more than 15 percent below the regional average and, as such, would not have a cumulative VMT impact.

2024 Modified Project Analysis

The modified project is located at the same site with similarly low VMT pursuant to the map-based screening. Cumulative residential VMT per capita is forecast to be7.31, which is significantly less than 15 percent below the regional average, which is a VMT per capita of 14.5. The modified project's restaurant component is forecast to have a cumulative VMT per capita of 8.43, which is also significantly less than 15 percent below the regional average, which is a VMT per capita of 13.3. As a result, there would be **no cumulative impact** on VMT.

Mitigation: None required.

Loading

2019 EIR Project Analysis

The 2019 EIR concluded that there are no reasonably foreseeable cumulative projects that would generate additional overlapping passenger or freight loading demand on the streets immediately adjacent to the project site where loading activity for the proposed project would occur. Therefore, there would be no cumulative impact on loading.

2024 Modified Project Analysis

The modified project is located at the same site as analyzed in the EIR and there are no additional cumulative projects proposed in the immediate vicinity. Therefore, there would be **no cumulative impact** on loading.

Mitigation: None required.

APPENDIX B: AIR QUALITY MEMO (FEBRUARY 26, 2025)

RAMBOLL

ENVIRONMENT
& HEALTH

MEMO

Date: **February 26, 2025**

To: **Josh Pollak, San Francisco Planning**

From: **Michael Keinath, PE**
Sarah Manzano
Kylie Rasmussen, PE

Subject: **Air Quality CEQA Analysis Results**
3700 California Street Project, San Francisco, CA

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INTRODUCTION

The Project site, located at 3700 California Street, is a 4.9-acre parcel in San Francisco's Presidio Heights neighborhood. The Project Sponsor is California 3700 LLC. The site was formerly occupied by Sutter Bay Hospitals, as their California Pacific Medical Center Campus.

Ramboll submitted a Methodology document, attached as Appendix A, to San Francisco Planning Department summarizing the Project understanding and the analytical methods used to develop the results discussed herein. The approved methodology document contains detailed information regarding the changes to the Project compared to the previously approved proposed Project ("EIR Project"), which is summarized below.

In the Draft Environmental Impact Report (DEIR), published in 2019, and the Final Environmental Impact Report (FEIR) approved in 2020 (collectively the "2020 EIR"), the EIR Project was evaluated. The EIR Project would demolish the existing hospital buildings on the site, including the removal of three existing generators. The EIR Project would construct or renovate 273 residential units and reduce 439 existing parking spaces to 416 parking spaces.

The Project Sponsor has proposed modifications to the previously approved Project, which is studied herein and referred to as the Modified Project. Compared to the 2020 EIR Project, the Modified Project would increase residential density at the 3700 California Street site. The Modified Project would construct 493 total residential units, approximately 220 more units than analyzed in the 2020 EIR, add 74 institutional units for assisted living, add 4,812 square feet of public restaurant use, provide 7,218 square feet of on-site amenity restaurant use and provide 488 parking spaces. The detailed land use sizes are summarized in Table 1 of the Methodology Memo in Attachment A. The Modified Project would add 3 emergency generators: one 100kW diesel generator located at building B1, a 200kW diesel generator located at building B2, and a 250kW diesel generator located at building C1.[1] As a result, the changes to the proposed Modified Project

[1] The EIR Project did not include any emergency generators, however the existing site and the prior hospital use has 3 emergency generators.

would change the construction and operational activity compared to what was previously studied in the 2020 EIR.

This memorandum summarizes the air quality impacts as analyzed according to the methods identified in Attachment A and presents the results to be used to compare the impacts from the Modified Project to the impacts identified in the 2020 EIR.

AIR QUALITY

Criteria Air Pollutant Emissions from Construction

The 2024 Modified Project includes updated land uses and an updated construction schedule that is summarized in Table 2 and Figure 1 of the Methodology Memo in Attachment A, which are based off the construction schedule included as Appendix B. The timeline, the order in which the phases are completed, and the number of work days changed with this update. The location and size of each phase did not change.

As discussed in the Methodology document, the updated schedule was used to calculate construction criteria air pollutant (CAP) emissions for the Project. An updated construction equipment list with horsepower ratings, utilization rates, and daily hours of operation is shown in Table 3 of the Methodology Memo in Attachment A. Estimated construction trips are shown in Methodology Table 4 of the Methodology Memo in Attachment A. Entrained road dust emission factors and emissions are calculated in **Table I – Table III**. Emissions from off-gassing activities including paving and architectural coatings are shown in **Table IV** and **Table V,** respectively.

A summary of the maximum annual average daily CAP emissions from construction is shown in **Table A** below and detailed construction CAP emissions are presented in **Table VI**. Compared to the 2020 EIR, the maximum annual average daily reactive organic gases (ROG) emissions increased slightly from 40 lbs/day to 47 lbs/day due to the increase in use of architectural coatings and all other CAPs decreased significantly.

Table A: Summary of Maximum Annual Average Daily Construction CAP Emissions

	ROG	**NO_x**	**PM_{10}**	**$PM_{2.5}$**
	lbs/day			
EIR Project	40	25	1.3	1.0
Modified Project	47	14	0.21	0.21

Criteria Air Pollutant Emissions from Operations

As a result of the updated land uses, the operational emissions have changed compared to those presented in the 2020 EIR. The Methodology document discusses the updated emission factors and assumptions used to determine the operational emissions summarized in **Table B** below. Emissions from the three proposed onsite generators are presented in **Table VII**. The mobile emissions were determined using trip rates and vehicle miles traveled (VMT) assumptions provided by the Project developer and their transportation consultant. These assumptions are presented in **Table VIII** and **Table IX**. **Table X** and **Table XI** presents a summary of all annual and daily operational emissions from 2028, the year Block B becomes operational, and 2029, the year all blocks become operational. Compared to the 2020 EIR, the total daily VMT increased from 5,494 miles to 10,503 miles and the

three proposed generators introduced a new source of emissions. Therefore, the Modified Project results in operational CAP emissions slightly greater than those determined in the 2020 EIR.

Table B: Summary of Full Buildout Operational CAP Emissions

	ROG	NO_x	PM_{10}	$PM_{2.5}$
	lbs/day			
EIR Project	18	3.8	4.2	1.3
Modified Project	21	5.5	7.6	2.1

In the 2020 EIR, the baseline emissions, annual construction emissions, and annual operational emissions were summed together to determine net emissions during each year of construction and at full buildout. The net emission each year from 2026 through 2029 are summarized in **Table XII**. The only year with net positive emissions is 2028 for ROG emissions, which can be attributed to the architectural coating and paving activities that are assumed to occur in 2028. This is similar to the findings in the 2020 EIR.

Similarly, **Table XIII** presents net operational emissions for buildout conditions after the existing baseline emissions have been removed. For both **Table XII** and **Table XIII**, the baseline emissions presented were the emissions calculated in the 2020 EIR.

Health Risk Assessment

Ramboll used the results from the updated emissions analysis discussed above to update the health risk assessment (HRA) to determine whether the Modified Project would result in any health risk impact that would exceed the applicable thresholds in the San Francisco Department of Public Health's Air Pollutant Exposure Zone (APEZ) criteria. Construction toxic air contaminants (TAC) emission rates used to calculate health risks are summarized in **Table XIV.** As discussed in the Air Quality Methodology Memo, Ramboll used the AERMOD modeling from the 2020 EIR for construction sources and created a new AERMOD model for emergency generator operations. Model parameters for the three emergency generators are presented in **Table XV**. Exposure parameters were calculated for three the exposure scenarios outlined below and are shown in **Tables XVI a-c**:

- Scenario 1: Offsite receptors' exposure beginning at the start of construction in 2026.
- Scenario 2: Offsite and Block B onsite receptors' exposure beginning at the end of Block B construction in 2028.
- Scenario 3: Offsite and Block A, B, and C onsite receptors' exposure beginning at the start of full buildout operation in 2029.

The maximum cancer risk and $PM_{2.5}$ concentration at the maximally exposed individual receptors (MEIR) locations for each receptor type and for each scenario is shown in **Tables XVII – XIX** and summarized in **Table XX** and **Table XXI.** A summary of the maximum offsite and onsite health risks among the three scenarios from the Project construction and operation are shown in **Table C.** The MEIR for each receptor type was determined after removing the risks from the existing generator that would be removed as a part of the Project. The existing generator risks were removed from offsite receptors' Project risks; but they were not removed from the onsite receptors' Project risks since the new receptors would not have previously been exposed to the existing generators. This methodology is consistent with the 2020 EIR.

Table C: Summary of Health Risk Assessment Results

	Health Impact	Cancer Risk (in a million)	$PM_{2.5}$ (µg/m³)
EIR Project	**Off-site MEIR**	6.1	0.032
	On-site MEIR	1.6	0.011
Modified Project	**Off-site MEIR**	5.0	0.031
	On-site MEIR	1.0	0.019

Cumulative Health Risk Assessment

Ramboll evaluated cumulative health risks using background risks at the Project MEIR locations from the 2020 San Francisco Citywide HRA, Project construction and operations, and the removal of the existing generators. Cumulative HRA results for cancer risk and $PM_{2.5}$ concentration are shown in **Tables XXII** and **Table XXIII** and are summarized in **Table D** and **Table E** below. For the onsite MEIR, the existing generators are removed from the cumulative impact only; whereas the existing generator impact is removed from the Project contribution for the offsite residents.

The cumulative HRA was used to determine if the offsite or onsite receptors would meet APEZ criteria of exceeding 100 in a million excess cancer risk or a $PM_{2.5}$ concentration of 9 µg/m³. The Modified Project maximally exposed receptors meets APEZ criteria for both cancer risk and $PM_{2.5}$ concentration since their cumulative cancer risks are above 100. Therefore, the Project contribution should be compared to the APEZ criteria for cancer risk and $PM_{2.5}$.

Table D: Summary of Cumulative Cancer Risk

MEIR Location	Cumulative Excess Lifetime Cancer Risk (in a million)	Project Site Meets APEZ Criteria?	Modified Project Contribution of Excess Lifetime Cancer Risk (in a million)
Off-site	131	Yes - cumulative cancer risks >100	5.0
On-site	111		1.0

Table E: Summary of Cumulative $PM_{2.5}$ Concentration

MEIR Location	Cumulative $PM_{2.5}$ Concentration (µg/m³)	Project Site Meets APEZ Criteria?	Modified Project Contribution of $PM_{2.5}$ Concentration (µg/m³)
Off-site	9.3	Yes – cumulative $PM_{2.5}$ concentration >9	0.030
On-site	9.1		0.019

TABLES

Table I
Silt Loading Emission Factors
3700 California Street
San Francisco, California

Entrained Roadway Dust Constants for San Francisco County	
Roadway Category	**Silt Loading[1] (g/m^2)**
All Roadways	0.50

Notes:

1. CalEEMod default construction silt loading factor for all roadways.

Abbreviations:

CalEEMod® - California Emissions Estimator Model®

g - gram

m^2 - square meter

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table II
Emission Factors for Entrained Roadway Dust
3700 California Street
San Francisco, California

Road Dust Equation[1]

E [lb/VMT] = k*(sL)^0.91 * (W)^1.02 * (1-P/4N)

Parameters	Value
E = annual average emission factor in the same units as k	[calculated]
k = particle size multiplier for particle size range	
PM_{10} (lb/VMT)	0.0022
$PM_{2.5}$ (lb/VMT)	3.3E-04
sL = roadway silt loading [grams per square meter - g/m^2]	0.50
W = average weight of vehicles traveling the road [tons]	2.4
P = number of "wet" days in county with at least 0.1 in of precipitation during the annual averaging period	67
N = number of days in the averaging period	365

Entrained Road Dust Emission Factors	
PM_{10} Emission Factor [lb/VMT]	2.7E-03
$PM_{2.5}$ Emission Factor [lb/VMT]	4.1E-04

Notes:

1. Road dust equation and parameters are from the California Air Resources Board's (ARB) 2021 Miscellaneous Process Methodology 7.9 for Entrained Road Travel, Paved Road Dust. The silt loading emission factor is assumed 0.5 g/m^3 according to BAAQMD CEQA Guidelines. The number of "wet" days for San Francisco is from CalEEMod® Appendix G Table 2. Other parameters (average weight of vehicles, size multipliers) are from ARB 2021. $PM_{2.5}$ is assumed to be 15% of PM_{10} based on paved road dust sampling in California (ARB Speciation Profile #471), which is a more representative fraction than provided in the older AP-42 fugitive dust methodology as discussed in ARB 2021 (page 10).

Abbreviations:

ARB - [California] Air Resources Board
BAAQMD - Bay Area Air Quality Management District
CalEEMod® - California Emissions Estimator Model®
g - gram
lb - pound
m^2 - square meter
$PM_{2.5}$ - particulate matter less than 2.5 microns
PM_{10} - particulate matter less than 10 microns
VMT - vehicle miles traveled

References:

BAAQMD. 2023. California Environmental Quality Act Air Quality Guidelines. Available online at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

California Air Resources Board. 2021. Miscellaneous Process Methodology 7.9, Entrained Road Travel, Paved Road Dust. March. Available online at: https://ww3.arb.ca.gov/ei/areasrc/fullpdf/2021_paved_roads_7_9.pdf

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table III
Emissions Calculations for Entrained Road Dust
3700 California Street
San Francisco, California

Entrained Road Dust Emission Factors[1]

$PM_{2.5}$ Emission Factor [lb/VMT]	4.1E-04

Phase	Year	Total VMT[2] (miles)	Total Emissions (lb/yr)
			Fugitive $PM_{2.5}$
Block A	2026	1,878	0.77
	2027	195	0.080
	2026	36	0.015
	2027	218	0.089
	2026	32	0.013
	2027	1,100	0.45
	2027	3,210	1.3
	2028	199	0.082
	2027	6,520	2.7
	2028	9,856	4.0
	2029	2,540	1.0
	2027	450	0.18
	2028	1,116	0.46
Block B	2026	6,697	2.7
	2026	2,165	0.89
	2026	6,652	2.7
	2026	3,961	1.6
	2027	844	0.35
	2026	11,979	4.9
	2027	46,665	19
	2028	35,937	15
	2027	3,463	1.4
	2028	1,964	0.80
Block C	2026	3,180	1.3
	2026	1,967	0.80
	2026	2,047	0.84
	2027	1,360	0.56
	2026	452	0.18
	2027	1,322	0.54
	2027	25,028	10
	2028	35,754	15
	2029	6,463	2.6
	2028	2,864	1.2

Notes:

1. Entrained road dust emission factor is calculated in Table II.
2. Total VMT is the sum of VMT from worker and vendor trips, as calculated in Methodology Report Table 4 for each phase.

Abbreviations:

lb - pound
$PM_{2.5}$ - particulate matter less than 2.5 microns
VMT - vehicle miles travelled
yr - year

Table IV
Estimated Emissions from Construction Paving Off-Gassing
3700 California Street
San Francisco, California

Phase	Building	Parking Area[1]		Asphalt Paving Off-Gassing ROG Emission Factor[2]	Asphalt Paving Off-Gassing ROG Emissions
		ft^2	acres	(lb/acre)	(lb)
Block A	Parking Lot	3,200	0.073	2.6	0.19
Block B	Parking Lot	8,800	0.20		0.53
Block C	Parking Lot	--	--		--
Total		12,000	0.28	--	0.72

Notes:

1. Parking areas are estimated using the CalEEMod default area per parking space and the number of above ground parking spaces provided by the project sponsor. Enclosed parking structures are assumed to have no asphalt paving. Parking lots are assumed to have asphalt paving.
2. VOC emissions from paving were calculated consistent with CalEEMod methodology.

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAPCOA - California Air Pollution Control Officers Association
lb - pound
ROG - reactive organic gas
ft^2- square feet

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table V
Estimated Emissions from Construction Architectural Coating Off-Gassing
3700 California Street
San Francisco, California

Coating Category	Interior	Exterior
VOC Content (g/L)[1]	100	150
Emission Factor (lb/ft^2)[2]	0.0046	0.0070

Land Use	Fraction of Surface Area Painted (%)		Painted Area Multiplier
Residential	75%	25%	2.7
Non-Residential	75%	25%	2.0
Paved Parking	0%	6%	--

Phase	Building Square Footage[3]			Painted Areas		ROG Emissions	
	Residential Area	Non-Residential Area	Parking Area	Interior	Exterior		
	ft^2	ft^2	ft^2	ft^2	ft^2	lb	tons
Block A	73,195	--	15,101	148,220	49,407	1,031	0.52
Block B	400,797	--	134,177	811,614	270,538	5,644	2.8
Block C	246,257	12,030	63,995	516,715	172,238	3,593	1.8
Total	**720,249**	**12,030**	**213,273**	**1,476,549**	**492,183**	**10,269**	**5.1**

Notes:

[1] VOC content of paint is assumed to be consistent with BAAQMD Regulation 8, Rule 3. VOC is assumed to be equivalent to ROG for these purposes.

[2] CalEEMod default architectural coating emission parameters were used to calculate VOC emission factors.

[3] Project square footage was provided by the Project Sponsor

Abbreviations:

BAAQMD - Bay Area Air Quality Management District
CalEEMod® - California Emissions Estimator Model®
g - gram
ft^2 - square feet
L - liter
lb - pound
ROG - reactive organic compound
VOC - volatile organic compound

References:

BAAQMD. 2009. Regulation 8 Rule 3 Architectural Coatings. July.

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table VI
Criteria Air Pollutants Emissions from Proposed Project Construction
3700 California Street
San Francisco, California

Total CAP Emissions						
Phase	**Year**	**Source**	**Emissions[1]**			
			ROG	**NO_x**	**PM_{10}**	**$PM_{2.5}$**
			lbs			
Block A	2026	Offroad Equipment[2]	18	157	3.4	3.4
	2027		37	313	6.9	6.9
	2028		22	183	4.1	4.1
	2029		1.9	16	0.37	0.37
Block B	2026		51	481	9.4	9.4
	2027		23	188	4.3	4.3
	2028		13	106	2.4	2.4
Block C	2026		61	592	11	11
	2027		14	117	2.7	2.7
	2028		12	97	2.2	2.2
	2029		1.3	11	0.26	0.26
Block A	2026	On-road Trucks and Vehicles[3]	6.9	82	0.64	0.61
	2027		37	496	3.9	3.7
	2028		35	267	2.2	2.1
	2029		7.8	45	0.39	0.37
Block B	2026		117	538	5.0	4.7
	2027		177	687	6.6	6.2
	2028		129	448	4.4	4.1
Block C	2026		29	188	1.6	1.5
	2027		98	406	3.9	3.6
	2028		135	374	4.0	3.7
	2029		22	59	0.62	0.59
Block A	2028	Architectural Coatings Off-Gassing[4]	1,031	--	--	--
Block B	2028		5,644	--	--	--
Block C	2028		3,593	--	--	--
Block A	2028	Paving Off-Gasing[5]	0.19	--	--	--
Block B	2028		0.53	--	--	--
Block C	2028		--	--	--	--
Total Emissions (lbs)			11,318	5,850	81	79

Average Daily Emissions					
Phase	**Year**	**Emissions[1]**			
		ROG	**NO_x**	**PM_{10}**	**$PM_{2.5}$**
		lbs/day			
Block A	2026	0.35	3.3	0.056	0.056
	2027	0.28	3.1	0.041	0.041
	2028	4.2	1.7	0.025	0.024
	2029	0.15	0.95	0.012	0.011
Block B	2026	0.84	5.1	0.072	0.071
	2027	0.77	3.4	0.042	0.040
	2028	29	2.8	0.034	0.033
Block C	2026	0.60	5.2	0.086	0.086
	2027	0.43	2.0	0.025	0.024
	2028	14	1.8	0.024	0.023
	2029	0.51	1.5	0.019	0.019

Table VI
Criteria Air Pollutants Emissions from Proposed Project Construction
3700 California Street
San Francisco, California

Total Combined Project Emissions				
Year	Emissions[1]			
	ROG	NO_x	PM_{10}	$PM_{2.5}$
	lbs/day			
2026	1.8	14	0.21	0.21
2027	1.5	8.5	0.11	0.11
2028	47	6.3	0.082	0.080
2029	0.66	2.5	0.031	0.030

Notes:

1. Emissions were estimated using methodology consistent with CalEEMod®.
2. A construction equipment list and hours of operation for each piece of equipment for each phase were provided by the project sponsor. See Table 3 for more details. Emissions are calculated based on the default CalEEMod® off-road construction equipment emission factors for each piece of equipment for each year being modeled.
3. Total number of hauling, concrete, and delivery trips was provided by the project sponsor for each Phase. Trip lengths for hauling, concrete, and vendor trips were assumed to be CalEEMod® defaults.
4. Architectural Coating emissions are calculated in Table V. It was conservatively assumed architectural coating would occur in 2028 for all blocks to analyze the maximum overlap.
5. Paving emissions are calculated in Table IV. Because there is no subphase that explicitly indicates when paving will happen, it was conservatively assumed to occur in 2028 for all blocks.

Abbreviations:

BAAQMD - Bay Area Air Quality Management District
CAP - criteria air pollutant
CalEEMod® - California Emissions Estimate Model
lb - pound
NOx - oxides of nitrogen
PM_{10} - particulate matter less than 10 microns
$PM_{2.5}$ - particulate matter less than 2.5 microns
ROG - reactive organic gas

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table VII
Emergency Engine Emissions during Project Operations
3700 California Street
San Francisco, California

Emergency Engine Emission Factors for Diesel Engines

Fuel	Engine Size Range (hp)		TIER 4 Engine Emission Factors[1] (g/bhp-hr)			
	Minimum	Maximum	ROG	NO_x	PM_{10}	$PM_{2.5}$
Diesel	100	175	0.150	0.290	0.015	0.015
Diesel	175	300	0.150	0.300	0.015	0.015
Diesel	300	600	0.150	0.300	0.015	0.015

Emergency Engine Information[2]

Scenario	Engine Type	Number of Engines	Size kW	Size hp	Fuel Type	Annual Operation[3] hr/yr
Project Operation	Generator	1	100	134	Diesel	50
	Generator	1	200	268	Diesel	50
	Generator	1	250	335	Diesel	50

Emergency Engine Emissions

Engine Type	Size (hp)	Quantity	Annual Emissions (ton/yr)			
			ROG	NO_x	PM_{10}	$PM_{2.5}$
Generator	134	1	0.0011	0.0021	1.1E-04	1.1E-04
Generator	268	1	0.0022	0.0044	2.2E-04	2.2E-04
Generator	335	1	0.0028	0.0055	2.8E-04	2.8E-04
Total Emissions			**0.0061**	**0.012**	**6.1E-04**	**6.1E-04**

Notes:

[1] Engine emission factors for PM_{10} and $PM_{2.5}$ (assumed all engines are diesel fueled and that all PM_{10} is diesel particulate matter) based on ARB standards for diesel generator engines. Emission factors for TOG and ROG were converted from NMHC values provided in the Tier standards using EPA hydrocarbon conversion factors. When an emission factor was specified as a combined NMHC+NOx factor, the NMHC/NOx ratio of 5%/95% were taken from BAAQMD guidance.

[2] Engine numbers, size, and fuel type of emergency generators are Project-specific estimates.

[3] Operation for routine maintenance and testing was conservatively assumed to be 50 hours per year, the maximum allowable by the Airborne Toxics Control Measure (ATCM) for Stationary Compression Ignition Engines (17 CCR 93115).

Abbreviations:

ARB - [California] Air Resources Board
BAAQMD - Bay Area Air Quality Management District
CalEEMod® - California Emissions Estimator Model®
EPA - Environmental Protection Agency
g/bhp-hr - grams per brake horsepower hour
hp - horsepower
kW - kilowatt
MT - metric ton
NMHC - non methane hydrocarbon
NO_x - oxides of nitrogen
PM_{10} - particulate matter less than 10 microns
$PM_{2.5}$ - particulate matter less than 2.5 microns
ROG - reactive organic gases
TOG - total organic gases
yr - year
hr - hour

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod), Version 2022.1.0. Available online at http://www.caleemod.com/

California Air Resources Board. Non-road Diesel Engine Certification Tier Chart. Available online at: https://ww2.arb.ca.gov/resources/documents/non-road-diesel-engine-certification-tier-chart

San Francisco Planning. 2024. Air Quality and Greenhouse Gas Analysis Guidelines. Available online at: https://sfplanning.org/air-quality

Table VIII
Operational Trip Rates
3700 California Street
San Francisco, California

Project Trip Rates

Land Use Type	Amount	Size Metric	Daily Trip Rate (trips/day/size metric)[1, 2]	Total Daily Trips
Multi-family	320	DU	2.1	667
Multi-family - Senior Housing	158	DU	3.2	509
Townhomes	15	DU	2.1	31
Assisted Living and Memory Care	74	DU	3.1	231
Restaurant - public	4.812	1000 sq ft	106	510

Notes:

1. Project trips are provided by the Project Developer's transportation consultant.
2. Trip rate is assumed to be the same for weekends and weekdays.

Abbreviations:

sq ft - square feet

DU - dwelling unit

Table IX
Operational Trip Lengths
3700 California Street
San Francisco, California

Block	Land Use Type	Amount	Size Metric	Trips/Day/Size Metric[1]	Total Daily Trips	Population Rate[2]	Population[3]	VMT/ Capita[4]	Daily VMT[5]
A	Residential	50	DU	2.1	104	2.29	120	7.8	936
B	Residential	285	DU	2.1	594	2.29	666	7.8	5,196
C	Residential - Senior Housing Residents	158	DU	3.2	509	1.63	258	7.8	2,012
	Assisted Living and Memory Care - Residents	74	DU	3.1	231	1.32	98	7.8	764
	Assisted Living and Memory Care - Employees					1.10	82	18	1,463
	Restaurant - Employees	4.8	1000 sq ft	106	510	--	14	9.4	131

Notes:

1. Trip rate as calculated in Table VIII and is assumed to be the same for weekends and weekdays.
2. The population rates are provided by the Project Developer.
3. The population for each land use type per block is determined by multiplying the population rate by the number of dwelling units. This estimate includes the added bonus population, consistent with methodology used in the 3700 California Street entitled EIR.
4. VMT/capita are provided by the Project Developer's transportation consultant. While Memory Care residents may not personally travel, the VMT can represent visitors of the facility.
5. Daily VMT is the product of population and VMT per capita and is assumed to be the same for weekends and weekdays.

Abbreviations:

DU - dwelling unit
mi - miles
sq ft - square feet
VMT - vehicle miles traveled

Table X
Annual Operational CAP Emissions
3700 California Street
San Francisco, California

Modeled Year	Category	Average Yearly Operational Emissions[1] [tons/yr]			
		ROG	**NO_x**	**PM_{10}**	**$PM_{2.5}$**
2028 Block B Operation[2]	Area[4]	1.6	0.031	0.0026	0.0022
	Energy	0.0074	0.13	0.010	0.010
	Mobile[5]	0.36	0.27	0.67	0.17
	Generator[6]	0.0033	0.0066	3.3E-04	3.3E-04
Total		**1.9**	**0.44**	**0.69**	**0.19**
2029 Full Project Buildout[3]	Area[4]	2.9	0.059	0.0049	0.0042
	Energy	0.019	0.32	0.026	0.026
	Mobile[5]	1.0	0.61	1.4	0.35
	Generator[6]	0.0061	0.012	0.00061	0.00061
Total		**3.9**	**1.0**	**1.4**	**0.38**

Notes:

1. Operational emissions were calculated with CalEEMod® version 2022.1.
2. Emissions were estimated for the operation of full occupation of Block B for the entire year.
3. All blocks will be fully operational in 2029. Emissions were estimated assuming full occupation immediately after completion of construction.
4. For consumer products, ROG emissions were calculated based on the average emissions factor for the City of San Francisco. San Francisco's ROG emissions from consumer products was 5.67 tons. San Francisco's building square footage was 774,348,056 square feet. Therefore, the emission factor was updated as follows:
(5.67 tons/day * 2000 lbs/ton)/774,348,056 sq. ft. = 1.46 x 10-5 lbs/(sq. ft.-day).
5. The mobile emissions are determined in CalEEMod using the trip and VMT assumptions from Table VIII and Table IX.
6. Generator emissions as calculated in Table VII. The 134 hp and 268 hp generators are located in Block B and are assumed to become operational in 2028.

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - criteria air pollutant
NO_x - nitrogen oxides
PM_{10} - particulate matter less than 10 microns
$PM_{2.5}$ - particulate matter less than 2.5 microns
ROG - reactive organic gases
sq ft - square feet
yr - year
VMT - vehicle miles traveled

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

City of San Francisco. Land Use Data. Available online at https://data.sfgov.org/Housing-and-Buildings/Land-Use/us3s-fp9q.

California Air Resources Board. Almanac Emission Projection Data. Available online at https://www.arb.ca.gov/app/emsinv/emssumcat.php. Accessed November 2021.

Table XI
Average Daily Operational CAP Emissions
3700 California Street
San Francisco, California

Modeled Year	Category	Average Daily Operational Emissions[1] [lb/day]			
		ROG	NO_x	PM_{10}	$PM_{2.5}$
2028 Block B Operation[2]	Area[4]	8.5	0.17	0.014	0.012
	Energy	0.040	0.69	0.056	0.056
	Mobile[5]	2.0	1.5	3.7	1.0
	Generator[6]	0.018	0.036	0.0018	0.0018
Total		**11**	**2.4**	**3.8**	**1.0**
2029 Full Project Buildout[3]	Area[4]	16	0.33	0.027	0.023
	Energy	0.10	1.8	0.14	0.14
	Mobile[5]	5.5	3.4	7.5	1.9
	Generator[6]	0.033	0.066	0.0033	0.0033
Total		**21**	**5.5**	**7.6**	**2.1**

Notes:

1. Operational emissions were calculated with CalEEMod® version 2022.1 and converted from tons per year to pounds per day assuming 365 days of operation per year.
2. Emissions were estimated for the operation of full occupation of Block B for the entire year.
3. All blocks will be fully operational in 2029. Emissions were estimated assuming full occupation immediately after completion of construction.
4. For consumer products, ROG emissions were calculated based on the average emissions factor for the City of San Francisco. San Francisco's ROG emissions from consumer products was 5.67 tons. San Francisco's building square footage was 774,348,056 square feet. Therefore, the emission factor was updated as follows:
   (5.67 tons/day * 2000 lbs/ton)/774,348,056 sq. ft. = 1.46 x 10-5 lbs/(sq. ft.-day).
5. The mobile emissions are determined in CalEEMod using the trip and VMT assumptions from Table VIII and Table IX.
6. Generator emissions as calculated in Table VII. The 134 hp and 268 hp generators are located in Block B and are assumed to become operational in 2028.

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
CAP - criteria air pollutant
NO_x - nitrogen oxides
PM_{10} - particulate matter less than 10 microns
$PM_{2.5}$ - particulate matter less than 2.5 microns
ROG - reactive organic gases
sq ft - square feet
yr - year
VMT - vehicle miles traveled

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

City of San Francisco. Land Use Data. Available online at https://data.sfgov.org/Housing-and-Buildings/Land-Use/us3s-fp9q.

California Air Resources Board. Almanac Emission Projection Data. Available online at https://www.arb.ca.gov/app/emsinv/emssumcat.php. Accessed November 2021.

Table XII
Emissions from the Proposed Project During Construction and Operations
3700 California Street
San Francisco, California

Year	Average Daily Emissions from Operation and Construction (lb/day)			
	ROG	NOx	PM_{10}	$PM_{2.5}$
2026				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	1.8	14	0.21	0.21
Year 2026 Net Emissions	-30	-34	-28	-8.8
2027				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	1.5	8.5	0.11	0.11
Year 2027 Net Emissions	-30	-40	-28	-8.9
2028				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	47	6.3	0.082	0.080
Project Operations	11	2.4	3.8	1.0
Year 2028 Net Emissions	26	-39	-24	-7.9
2029				
Existing Hospital Use	-32	-48	-28	-9.0
Project Construction	0.66	2.5	0.031	0.030
Project Operations	21	5.5	7.6	2.1
Year 2029 Net Emissions	-10	-40	-21	-6.9

Notes:

1. Operational criteria air pollutant emissions were estimated for Block B operation in 2028 and full project buildout in 2029. Average daily operational emissions are calculated in Table XI. Emissions from the existing hospital and medical uses were subtracted from the project's emissions for each year, starting at the beginning of construction.
2. Average daily construction emissions are calculated in Table VI.
3. Average daily construction emissions were added together with average daily operational emissions.

Abbreviations:

lb - pound
NO_x - nitrogen oxides
PM_{10} - particulate matter less than 10 microns in diameter
$PM_{2.5}$ - particulate matter less than 2.5 microns in diameter
ROG - reactive organic gases

Table XIII
Emissions from the Proposed Project During Operations at Full Buildout
3700 California Street
San Francisco, California

Emissions Source	Average Daily Emissions[1,2]			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Project Emissions				
Area[3] (lb/day)	16	0.33	0.027	0.023
Energy (lb/day)	0.10	1.8	0.14	0.14
Mobile (lb/day)	5.5	3.4	7.5	1.9
Generator (lb/day)	0.033	0.066	0.0033	0.0033
Total Project Emissions (lb/day)	21	5.5	7.6	2.1
Existing Emissions at the Site to Be Removed				
Area[3] (lb/day)	-15	-0.0063	-0.0023	-0.0023
Energy (lb/day)	-1.6	-15	-1.1	-1.1
Mobile (lb/day)	-15	-32	-27	-7.8
Generator (lb/day)	-0.086	-1.1	-0.081	-0.081
Total Baseline Emissions (lb/day)	-32	-48	-28	-9.0
Net Project Emissions	-10	-43	-21	-6.9
Total Project Emissions (tons/year)	-1.9	-7.8	-3.7	-1.3

Notes:

1. Emissions were estimated using CalEEMod, version 2022.1.
2. Average daily emissions were calculated assuming 365 days of operation per year.
3. For consumer products, ROG emissions were calculated based on the average emissions factor for the City of San Francisco. San Francisco's ROG emissions from consumer products was 5.67 tons. San Francisco's building square footage was 774,348,056 square feet. Therefore, the emission factor was updated as follows:
(5.67 tons/day * 2000 lbs/ton)/774,348,056 sq. ft. = 1.46 x 10-5 lbs/(sq. ft.-day).

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
lb - pound
NO_x - nitrogen oxides
PM_{10} - particulate matter less than 10 microns in diameter
$PM_{2.5}$ - particulate matter less than 2.5 microns in diameter
ROG - reactive organic gases
sq ft - square feet

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table XIV
Modeled Emission Rates from Proposed Project Construction Sources
3700 California Street
San Francisco, California

Phase	Year	Annual TAC Emissions[1] [lb]					Modeled Emissions[2] [g/s]				
		Offroad Sources		Onroad Sources			Offroad Sources		Onroad Sources[3]		
		DPM	$PM_{2.5}$	DPM	$PM_{2.5}$		DPM	$PM_{2.5}$	DPM	$PM_{2.5}$	
		Exhaust	Exhaust	Exhaust	Exhaust	Fugitive	Exhaust	Exhaust	Exhaust	Exhaust	Fugitive
Block A	2026	3.4	3.4	0.64	0.61	2.0	5.0E-05	5.0E-05	3.2E-07	3.8E-07	1.2E-05
	2027	6.9	6.9	3.9	3.7	12	1.0E-04	1.0E-04	2.4E-06	2.7E-06	7.4E-05
	2028	4.1	4.1	2.2	2.1	9.2	6.0E-05	6.0E-05	1.6E-06	1.9E-06	7.0E-05
	2029	0.37	0.37	0.39	0.37	1.9	5.3E-06	5.4E-06	3.0E-07	3.8E-07	1.6E-05
Block B	2026	9.4	9.4	5.0	4.7	23	1.4E-04	1.4E-04	2.4E-06	3.8E-06	1.9E-04
	2027	4.3	4.3	6.6	6.2	36	6.3E-05	6.6E-05	4.4E-06	6.3E-06	3.2E-04
	2028	2.4	2.4	4.4	4.1	26	3.6E-05	3.8E-05	3.0E-06	4.4E-06	2.3E-04
Block C	2026	11	11	1.6	1.5	6.3	1.6E-04	1.6E-04	6.9E-07	1.0E-06	4.7E-05
	2027	2.7	2.7	3.9	3.6	20	3.9E-05	4.1E-05	2.2E-06	3.3E-06	1.7E-04
	2028	2.2	2.2	4.0	3.7	26	3.3E-05	3.5E-05	2.3E-06	3.8E-06	2.4E-04
	2029	0.26	0.26	0.62	0.59	4.3	3.7E-06	4.1E-06	3.7E-07	6.1E-07	4.0E-05

Notes:

1. Emissions were estimated using methodology consistent with CalEEMod®.
2. Annual emissions were converted to g/s by dividing by assuming 365 days per year and 24 hours per day. Construction was modeled for ten hours per day for the duration of construction, so the difference in emission rate was reconciled using an AERMOD EMISFAC of 2.4 for construction hours.
3. For modeling purposes, emissions from onroad sources are based on the model trip length.

Abbreviations:

CalEEMod® - California Emissions Estimator Model®
DPM - diesel particulate matter
g/s - grams per second
lb - pound
$PM_{2.5}$ - particulate matter less than 2.5 microns
TAC - toxic air contaminant

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table XV
Modeling Parameters for Emergency Generator Operations
3700 California Street
San Francisco, California

Operational Point Sources

Source[1]	Source Type	Number of Sources	Release Height[2]	Exit Temperature[2]	Exit Diameter[2]	Exit Velocity[2]	Annual Average Emission Rate[3]
			(m)	(K)	(m)	(m/s)	(g/s)
Building B1 Emergency Generator	Point	1.0	24	740	0.18	45	3.2E-06
Building B2 Emergency Generator	Point	1.0	32	740	0.18	45	6.4E-06
Building C Emergency Generator	Point	1.0	28	740	0.18	45	8.0E-06

Notes:

1. Three emergency generators, rated at 100kW, 200kW and 250kW, would be located at the proposed site.
2. Stack parameters are based on generator defaults from the 2022 BAAQMD CEQA Guidelines. Since the generators will be located on the rooftops of the buildings, release height is calculated as the BAAQMD default height of 3.66 meters plus the respective building height.
3. Annual emissions of DPM and PM2.5 were based on 150 hours of combined non-emergency and emergency operation, as shown in Table VII.

Abbreviations:

BAAQMD - Bay Area Air Quality Management District
DPM - diesel particulate matter
g - gram
K - Kelvin
m - meter
$PM_{2.5}$ - particulate matter less than 2.5 microns
s - second

References:

BAAQMD. 2023. Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?la=en

Table XVIa
Scenario 1 Exposure Parameters for Health Risk Assessment
3700 California Street
San Francisco, California

Construction + Operations Scenario

Receptor Type	Project Phase	Year	Receptor Age Group	Exposure Parameters								
				Daily Breathing Rate (DBR)[1]	Exposure Duration (ED)[2]	Fraction of Time at Home (FAH)[3]	Exposure Frequency (EF)[4]	Age Sensitivity Factor[5]	Averaging Time (AT)[6]	Modeling Adjustment Factor[7]	Adjusted Intake Factor, Inhalation (IFinh)	Adjusted Intake Factor, Inhalation (IFinh)
				[L/kg-day]	[years]	[unitless]	[days/year]		[days]	[unitless]	[m^3/kg-day]	[m^3/kg-day]
Residential	Construction	2026	3rd Trimester	361	0.33	1.0	350	10	25,500	1.0	0.016	0.12
			Age 0-<2	1,090	0.67	1.0		10		1.0	0.10	
		2027	Age 0-<2	1,090	1.0	1.0		10		1.0	0.15	0.15
		2028	Age 0-<2	1,090	0.63	1.0		10		1.0	0.094	0.10
			Age 2-<16	572	0.37	1.0		3.0		1.0	0.0088	
		2029	Age 2-<16	572	1.0	1.0		3.0		1.0	0.024	0.024
	Operations	2029+	Age 2-<16	572	13	1.0		3.0		1.0	0.31	0.34
			Age 16+	261	13	0.73		1.0		1.0	0.034	
Worker	Construction	2026	Age 16-70	230	1.0	1.0	250	1.0		4.2	0.0095	0.040
		2027	Age 16-70	230	1.0	1.0		1.0		4.2	0.0095	0.040
		2028	Age 16-70	230	1.0	1.0		1.0		4.2	0.0095	0.040
		2029	Age 16-70	230	1.0	1.0		1.0		4.2	0.0095	0.040
	Operations	2029+	Age 16-70	230	21	1.0		1.0		1.0	0.047	0.047

Notes:

1. Daily breathing rates by receptor type and age bin are consistent with Table 34 of Appendix E of the 2022 BAAQMD CEQA Guidelines.
2. Annual exposure duration represents one full year. The exposure duration for all years is 1, as the health risk assessment is based on annual emissions. For the construction scenario, residential receptors are assumed to begin the third trimester at the beginning of construction and continue exposure until the end of construction.
3. Fraction of time spent at home is conservatively assumed to be 1 (i.e., 24 hours/day) for age groups from the third trimester to less than 16 years old based on the recommendation from BAAQMD (BAAQMD 2022) and OEHHA (OEHHA 2015). The fraction of time at home for adults age 16-30 reflects default OEHHA guidance (OEHHA 2015) as recommended by BAAQMD (2022).
4. Exposure frequency is consistent with 2022 BAAQMD CEQA Guidelines and was determined as follows:
   Residents, nursing home residents, and recreational receptors: reflects default residential exposure frequency from Cal/EPA.
   Worker: reflects default worker exposure frequency, consistent with 2022 BAAQMD CEQA Guidelines.
5. Age Sensitive Factors account for an "anticipated special sensitivity to carcinogens" of infants and children as recommended in the OEHHA Technical Support Document and current OEHHA guidance. This is consistent with the 2022 BAAQMD CEQA Guidelines.
6. Averaging time reflects the recommended value in OEHHA section 8.2.4.
7. Modeling adjustment factors are calculated based on the methodology from OEHHA's Guidance Manual for Preparation of Health Risk Assessments (2015). For construction, the MAF for the school, daycare and pre-school receptors are calculated to adjust from 24 hours/day to 8 hours/day and from 7 days/week to 5 days/week ([24 hours/8 hours] * [7 days/5 days] = 4.20); Resident types are expected to be exposed 24 hours/day and 7 days/week; as a result, the MAF is 1. Operational sources are expected 24 hours/day and 7 days/week; as a result, the MAF is 1 for all receptors.

Table XVIa
Scenario 1 Exposure Parameters for Health Risk Assessment
3700 California Street
San Francisco, California

Calculation:

IF_{inh} = DBR * FAH * EF * ED * CF / AT

CF = 0.001 (m^3/L)

$MAF=H_{Resident}/H_{Source}*D_{Resident}/D_{Source}*DF$

Where:

MAF_{cancer} = Modeling Adjustment Factor for cancer risk
$H_{Resident}$ = Hours per day of residential exposure (24 hours)
H_{Source} = Number of hours per day that the source operates (hours)
$D_{Resident}$ = Number of days per week that the resident is exposed (7 days)
D_{Source} = Number of days per year that the source operates (days)
DF = Discount Factor

$DF=H_{Coin}/H_{Worker}*D_{Coin}/D_{Worker}$

Where:

DF = Discount Factor
H_{Coin} - Hour per day that the receptor's schedule coincides with when the source is emitting (hours)
H_{Worker} - Hours that the receptor is at the site per day (hours)
D_{Coin} - Number of days per week that receptor's schedule coincides with when the source is emitting (days)
D_{Worker} - Number of days that the receptor is at the site per week (days)

Abbreviations:

AT - averaging time
BAAQMD - Bay Area Air Quality Management District
Cal/EPA - California Environmental Protection Agency
CF - conversion factor
DBR - daily breathing rate
ED - exposure duration
EF - exposure frequency
FAH - fraction of time at home
IF_{inh} - intake factor
kg - kilogram
L - liter
m^3 - cubic meter
OEHHA - Office of Environmental Health Hazard Assessment
MAF_{cancer} - Modeling Adjustment Factor for cancer risk

References:

OEHHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. Available at https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf
BAAQMD. 2023. Air Quality Guidelines Appendix E: Recommended Methods For Screening and Modeling Local Risks and Hazards. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?la=en

Table XVIb
Scenario 2 Exposure Parameters for Health Risk Assessment
3700 California Street
San Francisco, California

Construction +Operations Scenario (Block B onsite added)

Receptor Type	Project Phase	Year	Receptor Age Group	Exposure Parameters								
				Daily Breathing Rate (DBR)[1]	Exposure Duration (ED)[2]	Fraction of Time at Home (FAH)[3]	Exposure Frequency (EF)[4]	Age Sensitivity Factor[5]	Averaging Time (AT)[6]	Modeling Adjustment Factor[7]	Adjusted Intake Factor, Inhalation (IFinh)	Adjusted Intake Factor, Inhalation (IFinh)
				[L/kg-day]	[years]	[unitless]	[days/year]		[days]	[unitless]	[m^3/kg-day]	[m^3/kg-day]
Residential	Construction	2028	3rd Trimester	361	1.0	1.0	350	10	25,500	1.0	0.050	0.050
		2029	3rd Trimester	361	0.076	1.0		10		1.0	0.0038	0.14
		2029	Age 0-<2	1,090	0.91	1.0		10		1.0	0.14	
	Operations	2029+	Age 0-<2	1,090	1.7	1.0		10		1.0	0.26	0.62
		2029+	Age 2-<16	572	14	1.0		3.0		1.0	0.33	
		2029+	Age 16+	261	12	0.73		1.0		1.0	0.032	
Worker	Construction	2028	Age 16-70	230	1.0	1.0	250	1.0		4.2	0.0095	0.0095
		2029	Age 16-70	230	1.0	1.0		1.0		4.2	0.0095	0.0095
	Operations	2029+	Age 16-70	230	23	1.0		1.0		1.0	0.052	0.052
Block B Onsite Residential	Construction	2028	3rd Trimester	361	1.0	1.0	350	10		1.0	0.050	0.050
		2029	3rd Trimester	361	0.076	1.0		10		1.0	0.0038	0.14
		2029	Age 0-<2	1,090	0.91	1.0		10		1.0	0.14	
	Operations	2029+	Age 0-<2	1,090	1.7	1.0		10		1.0	0.26	0.62
		2029+	Age 2-<16	572	14	1.0		3.0		1.0	0.33	
		2029+	Age 16+	261	12	0.73		1.0		1.0	0.032	

Notes:

1. Daily breathing rates by receptor type and age bin are consistent with Table 34 of Appendix E of the 2022 BAAQMD CEQA Guidelines.
2. Annual exposure duration represents one full year. The exposure duration for all years is 1, as the health risk assessment is based on annual emissions. For the construction scenario, residential receptors are assumed to begin the third trimester at the beginning of construction and continue exposure until the end of construction.
3. Fraction of time spent at home is conservatively assumed to be 1 (i.e., 24 hours/day) for age groups from the third trimester to less than 16 years old based on the recommendation from BAAQMD (BAAQMD 2022) and OEHHA (OEHHA 2015). The fraction of time at home for adults age 16-30 reflects default OEHHA guidance (OEHHA 2015) as recommended by BAAQMD (2022).
4. Exposure frequency is consistent with 2022 BAAQMD CEQA Guidelines and was determined as follows:
   Residents, nursing home residents, and recreational receptors: reflects default residential exposure frequency from Cal/EPA.
   Worker: reflects default worker exposure frequency, consistent with 2022 BAAQMD CEQA Guidelines.
5. Age Sensitive Factors account for an "anticipated special sensitivity to carcinogens" of infants and children as recommended in the OEHHA Technical Support Document and current OEHHA guidance. This is consistent with the 2022 BAAQMD CEQA Guidelines.
6. Averaging time reflects the recommended value in OEHHA section 8.2.4.
7. Modeling adjustment factors are calculated based on the methodology from OEHHA's Guidance Manual for Preparation of Health Risk Assessments (2015). For construction, the MAF for the school, daycare and pre-school receptors are calculated to adjust from 24 hours/day to 8 hours/day and from 7 days/week to 5 days/week ([24 hours/8 hours] * [7 days/5 days] = 4.20); Resident types are expected to be exposed 24 hours/day and 7 days/week; as a result, the MAF is 1. Operational sources are expected 24 hours/day and 7 days/week; as a result, the MAF is 1 for all receptors.

RAMBOLL

Table XVIb
Scenario 2 Exposure Parameters for Health Risk Assessment
3700 California Street
San Francisco, California

Calculation:

IF_{inh} = DBR * FAH * EF * ED * CF / AT

CF = 0.001 (m^3/L)

$MAF=H_{Resident}/H_{Source}*D_{Resident}/D_{Source}*DF$

Where:

MAF_{cancer} = Modeling Adjustment Factor for cancer risk
$H_{Resident}$ = Hours per day of residential exposure (24 hours)
H_{Source} = Number of hours per day that the source operates (hours)
$D_{Resident}$ = Number of days per week that the resident is exposed (7 days)
D_{Source} = Number of days per year that the source operates (days)
DF = Discount Factor

$DF=H_{Coin}/H_{Worker}*D_{Coin}/D_{Worker}$

Where:

DF = Discount Factor
H_{Coin} - Hour per day that the receptor's schedule coincides with when the source is emitting (hours)
H_{Worker} - Hours that the receptor is at the site per day (hours)
D_{Coin} - Number of days per week that receptor's schedule coincides with when the source is emitting (days)
D_{Worker} - Number of days that the receptor is at the site per week (days)

Abbreviations:

AT - averaging time
BAAQMD - Bay Area Air Quality Management District
Cal/EPA - California Environmental Protection Agency
CF - conversion factor
DBR - daily breathing rate
ED - exposure duration
EF - exposure frequency
FAH - fraction of time at home
IF_{inh} - intake factor
kg - kilogram
L - liter
m^3 - cubic meter
OEHHA - Office of Environmental Health Hazard Assessment
MAF_{cancer} - Modeling Adjustment Factor for cancer risk

References:

OEHHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. Available at https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf
BAAQMD. 2023. Air Quality Guidelines Appendix E: Recommended Methods For Screening and Modeling Local Risks and Hazards. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?la=en

Table XVIc
Scenario 3 Exposure Parameters for Health Risk Assessment
3700 California Street
San Francisco, California

Operations Scenario (Block A, B, and C onsite added)

Receptor Type	Project Phase	Year	Receptor Age Group	Exposure Parameters								
				Daily Breathing Rate (DBR)[1]	Exposure Duration (ED)[2]	Fraction of Time at Home (FAH)[3]	Exposure Frequency (EF)[4]	Age Sensitivity Factor[5]	Averaging Time (AT)[6]	Modeling Adjustment Factor[7]	Adjusted Intake Factor, Inhalation (IFinh)	Adjusted Intake Factor, Inhalation (IFinh)
				[L/kg-day]	[years]	[unitless]	[days/year]		[days]	[unitless]	[m^3/kg-day]	[m^3/kg-day]
Residential	Operations	All	3rd Trimester	361	0.25	1.0	350	10	25,500	1.0	0.012	0.68
			Age 0-<2	1,090	2.0	1.0		10		1.0	0.30	
			Age 2-<16	572	14	1.0		3.0		1.0	0.33	
			Age 16+	261	14	0.73		1.0		1.0	0.036	
Worker	Operations	All	Age 16-70	230	25	1.0	250	1.0		1.0	0.056	0.056
Block C Onsite Residential	Operations	All	3rd Trimester	361	0.25	1.0	350	10		1.0	0.012	0.68
			Age 0-<2	1,090	2.0	1.0		10		1.0	0.30	
			Age 2-<16	572	14	1.0		3.0		1.0	0.33	
			Age 16+	261	14	0.73		1.0		1.0	0.036	
Block B Onsite Residential	Operations	All	3rd Trimester	361	0.25	1.0		10		1.0	0.012	0.68
			Age 0-<2	1,090	2.0	1.0		10		1.0	0.30	
			Age 2-<16	572	14	1.0		3.0		1.0	0.33	
			Age 16+	261	14	0.73		1.0		1.0	0.036	
Block A Onsite Residential	Operations	All	3rd Trimester	361	0.25	1.0		10		1.0	0.012	0.68
			Age 0-<2	1,090	2.0	1.0		10		1.0	0.30	
			Age 2-<16	572	14	1.0		3.0		1.0	0.33	
			Age 16+	261	14	0.73		1.0		1.0	0.036	

Notes:

1. Daily breathing rates by receptor type and age bin are consistent with Table 34 of Appendix E of the 2022 BAAQMD CEQA Guidelines.
2. Annual exposure duration represents one full year. The exposure duration for all years is 1, as the health risk assessment is based on annual emissions. For the construction scenario, residential receptors are assumed to begin the third trimester at the beginning of construction and continue exposure until the end of construction.
3. Fraction of time spent at home is conservatively assumed to be 1 (i.e., 24 hours/day) for age groups from the third trimester to less than 16 years old based on the recommendation from BAAQMD (BAAQMD 2022) and OEHHA (OEHHA 2015). The fraction of time at home for adults age 16-30 reflects default OEHHA guidance (OEHHA 2015) as recommended by BAAQMD (2022).
4. Exposure frequency is consistent with 2022 BAAQMD CEQA Guidelines and was determined as follows:

   Residents, nursing home residents, and recreational receptors: reflects default residential exposure frequency from Cal/EPA.

   Worker: reflects default worker exposure frequency, consistent with 2022 BAAQMD CEQA Guidelines.
5. Age Sensitive Factors account for an "anticipated special sensitivity to carcinogens" of infants and children as recommended in the OEHHA Technical Support Document and current OEHHA guidance. This is consistent with the 2022 BAAQMD CEQA Guidelines.
6. Averaging time reflects the recommended value in OEHHA section 8.2.4.
7. Modeling adjustment factors are calculated based on the methodology from OEHHA's Guidance Manual for Preparation of Health Risk Assessments (2015). For construction, the MAF for the school, daycare and pre-school receptors are calculated to adjust from 24 hours/day to 8 hours/day and from 7 days/week to 5 days/week ([24 hours/8 hours] * [7 days/5 days] = 4.20); Resident types are expected to be exposed 24 hours/day and 7 days/week; as a result, the MAF is 1. Operational sources are expected 24 hours/day and 7 days/week; as a result, the MAF is 1 for all receptors.

Table XVIc
Scenario 3 Exposure Parameters for Health Risk Assessment
3700 California Street
San Francisco, California

Calculation:

IF_{inh} = DBR * FAH * EF * ED * CF / AT

CF = 0.001 (m^3/L)

$MAF=H_{Resident}/H_{Source}*D_{Resident}/D_{Source}*DF$

Where:

MAF_{cancer} = Modeling Adjustment Factor for cancer risk
$H_{Resident}$ = Hours per day of residential exposure (24 hours)
H_{Source} = Number of hours per day that the source operates (hours)
$D_{Resident}$ = Number of days per week that the resident is exposed (7 days)
D_{Source} = Number of days per year that the source operates (days)
DF = Discount Factor

$DF=H_{Coin}/H_{Worker}*D_{Coin}/D_{Worker}$

Where:

DF = Discount Factor
H_{Coin} - Hour per day that the receptor's schedule coincides with when the source is emitting (hours)
H_{Worker} - Hours that the receptor is at the site per day (hours)
D_{Coin} - Number of days per week that receptor's schedule coincides with when the source is emitting (days)
D_{Worker} - Number of days that the receptor is at the site per week (days)

Abbreviations:

AT - averaging time
BAAQMD - Bay Area Air Quality Management District
Cal/EPA - California Environmental Protection Agency
CF - conversion factor
DBR - daily breathing rate
ED - exposure duration
EF - exposure frequency
FAH - fraction of time at home
IF_{inh} - intake factor
kg - kilogram
L - liter
m^3 - cubic meter
OEHHA - Office of Environmental Health Hazard Assessment
MAF_{cancer} - Modeling Adjustment Factor for cancer risk

References:

OEHHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. Available at https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

BAAQMD. 2023. Air Quality Guidelines Appendix E: Recommended Methods For Screening and Modeling Local Risks and Hazards. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?la=en

Table XVII
Scenario 1 Maximum Project Construction and Operations Excess Lifetime Cancer Risk and PM2.5
3700 California Street
San Francisco, California

Receptor Category	Project Construction and Operations[1]	
	Excess Lifetime Cancer Risk[2,3]	$PM_{2.5}$ Concentration[3]
	in a million	µg/m^3
Offsite Resident	5.0	0.031
Offsite Worker	-0.018	0.012
Max	**5.0**	**0.031**
Max Receptor Type	Residential	Residential
Receptor Height (meters)[4]	1.8	1.8
Year	--	2027
UTMx	547780	547780
UTMy	4182220	4182220

Note:

1. This scenario begins when construction of Block B begins and includes construction of all blocks and operations of emergency generators. Impacts are assessed on all off-site receptors.
2. Excess lifetime cancer risks were estimated using the following equation:

   $Risk_{inh} = \Sigma C_i \times CF \times IF_{inh} \times CPF_i \times ASF$

   Where:

   $Risk_{inh}$ = Cancer Risk for the Inhalation Pathway (unitless)
   C_i = Annual Average Air Concentration for Chemical "i" ug/m^3
   CF = Conversion Factor (mg/ug)
   IF_{inh} = Intake Factor for Inhalation (m^3/kg-day)
   CPF_i = Cancer Potency Factor (mg/kg-day)$^{-1}$
   ASF = Age Sensitivity Factor (unitless)
3. This table show the maximally exposed individual (MEI) for each receptor type. The risks presented include the reduction from the removal of the existing generators. As a result, the max cancer risk for offsite workers is negative due to the removal of the existing generator.
4. Off-site receptors were modeled with a flag-pole height of 1.8m, consistent with the entitled EIR.

Abbreviations:

APEZ - Air Pollutant Exposure Zone
BAAQMD - Bay Area Air Quality Management District
m^3 - cubic meter
OEHHA - Office of Environmental Health Hazard Assessment
$PM_{2.5}$ - particulate matter less than 2.5 microns
µg - microgram
UTMx, UTMy - Universal Transverse Mercator coordinates

Reference:

BAAQMD. 2023. California Environmental Quality Act Air Quality Guidelines. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

OEHHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. February.

Table XVIII
Scenario 2 Maximum Project Construction and Operations Excess Lifetime Cancer Risk and PM2.5
3700 California Street
San Francisco, California

Source Category	Project Construction and Operations[1]	
	Excess Lifetime Cancer Risk[2,3]	$PM_{2.5}$ Concentration[3]
	in a million	µg/m^3
Block B Resident	1.0	0.019
Offsite Resident[3]	0.16	0.016
Offsite Worker	-0.48	0.0047
Max	**1.0**	**0.019**
Max Receptor Type	Block B Residential	Block B Residential
Receptor Height (meters)[4]	5.3	5.3
Year	--	2028
UTMx	547840	547840
UTMy	4182240	4182240

Note:

1. This scenario begins after Block B construction ends in December 2028 and it is assumed that occupation of residents begins immediately after. The new residents of Block B will be exposed to emissions from construction of Block A and Block C. Block C construction ends in March 2029 and it is assumed that occupation of residents begins immediately after. The new residents of Block C will be exposed to emissions from construction of Block A.
2. Excess lifetime cancer risks were estimated using the following equation:

$$Risk_{inh} = \Sigma C_i \times CF \times IF_{inh} \times CPF_i \times ASF$$

Where:

$Risk_{inh}$ = Cancer Risk for the Inhalation Pathway (unitless)
C_i = Annual Average Air Concentration for Chemical "i" ug/m^3
CF = Conversion Factor (mg/ug)
IF_{inh} = Intake Factor for Inhalation (m^3/kg-day)
CPF_i = Cancer Potency Factor $(mg/kg\text{-}day)^{-1}$
ASF = Age Sensitivity Factor (unitless)

3. This table show the maximally exposed individual (MEI) for each receptor type. The risks presented include the reduction from the removal of the existing generators. As a result, the max cancer risk for offsite workers is negative due to the removal of the existing generator.
4. Offsite receptors were modeled with a flag-pole height of 1.8m, consistent with the entitled EIR. Onsite receptors were modeled at a multiple elevations due to building height.

Abbreviations:

APEZ - Air Pollutant Exposure Zone
BAAQMD - Bay Area Air Quality Management District
m^3 - cubic meter
OEHHA - Office of Environmental Health Hazard Assessment
$PM_{2.5}$ - particulate matter less than 2.5 microns
µg - microgram
UTMx, UTMy - Universal Transverse Mercator coordinates

Reference:

BAAQMD. 2023. California Environmental Quality Act Air Quality Guidelines. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

OEHHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. February.

Table XIX
Scenario 3 Maximum Project Operations Only Excess Lifetime Cancer Risk and PM2.5
3700 California Street
San Francisco, California

Receptor Category	Project Operations Only[1]	
	Excess Lifetime Cancer Risk[2,3]	$PM_{2.5}$ Concentration[3]
	in a million	µg/m^3
Block A Resident	0.048	2.5E-05
Block B Resident	0.34	6.1E-05
Block C Resident	0.35	4.7E-04
Offsite Resident	-0.054	-7.3E-05
Offsite Worker	-0.12	-2.0E-03
Max	**0.35**	**0.00047**
Max Receptor Type	Block C Residential	Block C Residential
Receptor Height (meters)[4]	23	23
Year	--	ALL
UTMx	548000	548000
UTMy	4182300	4182300

Notes:

1. This scenario begins once all construction is over. The risks presented are from operation of the emergency generators. All offsite and onsite receptors are exposed.
2. Excess lifetime cancer risks were estimated using the following equation:

$$Risk_{inh} = \Sigma C_i \times CF \times IF_{inh} \times CPF_i \times ASF$$

Where:

$Risk_{inh}$ = Cancer Risk for the Inhalation Pathway (unitless)
C_i = Annual Average Air Concentration for Chemical "i" ug/m^3
CF = Conversion Factor (mg/ug)
IF_{inh} = Intake Factor for Inhalation (m^3/kg-day)
CPF_i = Cancer Potency Factor $(mg/kg\text{-}day)^{-1}$
ASF = Age Sensitivity Factor (unitless)

3. This table show the maximally exposed individual (MEI) for each receptor type. The risks presented include the reduction from the removal of the existing generators. As a result, the max cancer risks for offsite worker and resident are negative due to the removal of the existing generator.
4. Offsite receptors were modeled with a flag-pole height of 1.8m, consistent with the entitled EIR. Onsite receptors were modeled at a multiple elevations due to building height.

Abbreviations:

APEZ - Air Pollutant Exposure Zone
BAAQMD - Bay Area Air Quality Management District
m^3 - cubic meter
OEHHA - Office of Environmental Health Hazard Assessment
$PM_{2.5}$ - particulate matter less than 2.5 microns
µg - microgram
UTMx, UTMy - Universal Transverse Mercator coordinates

Reference:

BAAQMD. 2023. California Environmental Quality Act Air Quality Guidelines. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines

OEHHA. 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines. Guidance Manual for Preparation of Health Risk Assessments. February.

Table XX
Excess Lifetime Cancer Risk at Project Off-site and On-site MEIR
3700 California Street
San Francisco, California

Exposure Scenario[1]	Receptor Type	Excess Lifetime Cancer Risk [in a million]
Scenario 1	Offsite Resident	5.0
Scenario 2	Block B Resident	1.0
Scenario 3	Block C Resident	0.35

MEIR Location:

Scenario[2,3]	UTMx	UTMy	Receptor Height
	[m]		[m]
Scenario 1	547780	4182220	1.8
Scenario 2	547840	4182240	5.3
Scenario 3	548000	4182300	23

Notes:

1. Block B construction ends in December 2028 and it is assumed that occupation of residents begins immediately after. The new residents of Block B will be exposed to emissions from construction of Block A and Block C. Block C construction ends in March 2029 and it is assumed that occupation of residents begins immediately after. The new residents of Block C will be exposed to emissions from construction of Block A.
2. Offsite project MEIR was identified as the off-site sensitive receptor location with the maximum total cancer risk attributed to the emissions associated with the project construction and operations and the reduction from the existing generator.
3. Onsite project MEIR was identified as the on-site sensitive receptor location with the maximum total cancer risk attributed to the emissions associated with the project construction and operations.

Abbreviations:

m - meter

MEIR - Maximally Exposed Individual Receptor

UTMx, UTMy - Universal Transverse Mercator coordinates

Table XXI
PM2.5 Concentration at Project Off-site and On-site MEIR
3700 California Street
San Francisco, California

Scenario[2,3]	Receptor Type	PM2.5 Concentration[1] [ug/m^3]
Scenario 1	Offsite Resident	0.031
Scenario 2	Block B Resident	0.019
Scenario 3	Block C Resident	0.00047

MEIR Location:

Scenario[2,4]	UTMx	UTMy	Receptor Height
	[m]		[m]
Scenario 1	547780	4182220	1.8
Scenario 2	547840	4182240	5.3
Scenario 3	548000	4182300	23

Notes:

1. The Maximum Annual Project $PM_{2.5}$ Concentration is the maximum annual $PM_{2.5}$ concentration attributable to construction emissions.
2. Offsite Project MEIR was identified as the off-site sensitive receptor location with the maximum $PM_{2.5}$ concentration attributed to the emissions associated with the Project construction and reduction from the existing generator. The maximum concentrations from construction occur during 2026, the period of construction overlap for Blocks A, B, and C.
3. Block B construction ends in December 2028 and it is assumed that occupation of residents begins immediately after. The new residents of Block B will be exposed to emissions from construction of Block A and Block C. Block C construction ends in March 2029 and it is assumed that occupation of residents begins immediately after. The new residents of Block C will be exposed to emissions from construction of Block A.
4. On-site Project MEIR was identified as the on-site sensitive receptor location with the maximum $PM_{2.5}$ concentration attributed to the emissions associated with the project construction and operations.

Abbreviations:

m - meter
m^3 - cubic meter
µg - microgram
MEIR - Maximally Exposed Individual Receptor
$PM_{2.5}$ - particulate matter 2.5 microns or less
UTMx, UTMy - Universal Transverse Mercator coordinates

Table XXII
Existing and Cumulative Excess Lifetime Cancer Risk at Off-site and On-Site Project MEIR
3700 California Street
San Francisco, California

Source	Lifetime Excess Cancer Risk [in a million]	
	OffSite Resident[1]	Onsite Resident[2]
2020 Citywide Background Risk[3]	126	110
Project Construction + Operations[4]	5.7	1.0
Removal of Existing Generator[5]	-0.64	-0.72
3333 California St.[6]	0.027	0.030
Cumulative Total[7]	**131**	**111**
Proiect Contribution[5,8]	**5.0**	**1.0**

MEIR Location:

MEIR Type	UTMx	UTMy	Receptor Height
	[m]		
Offsite Resident	547780	4182220	1.8
Onsite Resident	547840	4182240	5.3

Notes:

1. Offsite Project MEIR was identified as the off-site sensitive receptor location with the maximum total cancer risk attributed to the emissions associated with the Project construction and operations and reduction from the existing generator as noted in Table XX.
2. Osite Project MEIR was identified as the on-site sensitive receptor location with the maximum total cancer risk attributed to the emissions associated with the Project construction and operation as noted in Table XX.
3. Background cancer risks concentrations for maximally exposed individuals (MEIs) were obtained from the 2020 San Francisco Citywide HRA database.
4. Construction includes impacts from off-road construction equipment and on-road construction trips. Operation includes impacts from emergency generators.
5. The existing onsite generators would be removed as part of the Project. Risks from these generators were determined from the entitled EIR analysis. The reduction is included in the total project contribution for offsite receptors only because they will no longer be exposed to the risks from the existing generators.
6. Construction health impacts for the 3333 California St. Project were taken from an analysis performed by Ramboll for a 2024 phasing update. Operational health impacts were taken from the 2021 update performed by Ramboll. Risks were added together.
7. Cumulative total health impacts are the sum of the Proposed Project impacts, background impacts included in the San Francisco Citywide HRA, and background impacts for future projects not included in the San Francisco Citywide HRA.
8. The receptor meets APEZ criteria since the cumulative total risk is above 100 in a million. Therefore, the Project contribution is presented to be compared to APEZ critera thresholds.

Abbreviations:

APEZ - Air Pollutant Exposure Zone
HRA - Health Risk Assessment
m - meter
MEIR - Maximally Exposed Individual Receptor
SFDPH - San Francisco Department of Public Health
UTMx, UTMy - Universal Transverse Mercator coordinates

References:

San Francisco Department of Public Health (SF DPH), San Francisco Planning Department (SF Planning), and Ramboll. 2020. San Francisco Citywide Health Risk Assessment: Technical Support Documentation. September.

Ramboll. 2024 Updated Phasing Project Air Quality and Noise Analysis Results 3333 California Street Project, San Francisco, CA. 2024.

Table XXIII
Existing and Cumulative PM2.5 Concentration at Off-site and On-Site Project MEIR
3700 California Street
San Francisco, California

Source	$PM_{2.5}$ Concentration [ug/m^3]	
	Offsite Resident[1]	**Onsite Resident[2]**
2020 Citywide Background Risk[3]	9.3	9.1
Project Construction + Operations[4]	0.031	0.019
Removal of Existing Generator[5]	-7.1E-04	-0.0011
3333 California St.[6]	0.0026	0.0013
Cumulative Total[7]	**9.3**	**9.1**
Project Contribution[8]	**0.030**	**0.019**

MEIR Location:

MEIR Type	UTMx	UTMy	Receptor Height
	[m]		
Offsite Resident	547780	4182220	1.8
Onsite Resident	547840	4182240	5.3

Notes:

1. Off-site Project MEIR was identified as the off-site receptor location with the maximum $PM_{2.5}$ attributed to the emissions associated with the Project construction as noted in Table XXI.
2. On-site Project MEIR was identified as the on-site receptor location with the maximum $PM_{2.5}$ attributed to the emissions associated with the Project construction and operation as noted in Table XXI.
3. Background $PM_{2.5}$ concentrations for maximally exposed individuals (MEIs) were obtained from the 2020 San Francisco Citywide HRA database.
4. Construction includes impacts from off-road construction equipment and on-road construction trips. Operation includes impacts from emergency generators.
5. The existing onsite generators would be removed as part of the Project. Risks from these generators were determined from the entitled EIR analysis. The reduction is included in the total project contribution for offsite receptors only because they will no longer be exposed to the risks from the existing generators.
6. Construction health impacts for the 3333 California St. Project were taken from an analysis performed by Ramboll for a 2024 phasing update. Operational risks were not included because the max $PM_{2.5}$ concentration occurs in 2027 and the 3700 California Project would not be operational in 2027.
7. Cumulative total health impacts are the sum of the Proposed Project impacts, background impacts included in the San Francisco Citywide HRA, and background impacts for future projects not included in the San Francisco Citywide HRA.
8. The receptor meets APEZ criteria since the cumulative total $PM_{2.5}$ risk is above 9 ug/m^3. Therefore, the Project contribution is presented to be compared to APEZ criteria thresholds for $PM_{2.5}$.

Abbreviations:

APEZ - Air Pollutant Exposure Zone
HRA - Health Risk Assessment
m - meter
MEIR - Maximally Exposed Individual Receptor
$PM_{2.5}$ - particulate matter 2.5 microns or less
SFDPH - San Francisco Department of Public Health
µg - microgram
UTMx, UTMy - Universal Transverse Mercator coordinates

References:

San Francisco Department of Public Health (SF DPH), San Francisco Planning Department (SF Planning), and Ramboll. 2020. San Francisco Citywide Health Risk Assessment: Technical Support Documentation. September.
Ramboll. 2024 Updated Phasing Project Air Quality and Noise Analysis Results 3333 California Street Project, San Francisco, CA. 2024.

RAMBOLL

APPENDIX A: METHODOLOGY REPORT

RAMBOLL

ENVIRONMENT
& HEALTH

MEMO

Date: **February 12, 2025**

To: **Josh Pollak, Environmental Planning, City of San Francisco**

From: **Michael Keinath**
Sarah Manzano
Kylie Rasmussen

Subject: **AIR QUALITY METHODOLOGY MEMO FOR CEQA ANALYSIS**
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PROJECT UNDERSTANDING

The Project site, located at 3700 California Street, is a 4.9-acre parcel in San Francisco's Presidio Heights neighborhood. The Project Sponsor is California 3700 LLC. The site was formerly occupied by Sutter Bay Hospitals, as their California Pacific Medical Center Campus.

The site currently contains seven buildings covering approximately 734,000 square feet, including 622,000 square feet of hospital and medical office space, a 7,000-square-foot residential building, and 105,000 square feet of enclosed parking in two garages. The buildings range from three to eight stories, with the six-story hospital at 3700 California Street being the most prominent. The site includes 333 enclosed parking spaces and 106 surface parking spaces.

In the Draft Environmental Impact Report (DEIR), published in 2019, and the Final Environmental Impact Report (FEIR) approved in 2020 (collectively the "2020 EIR"), the previously approved proposed Project ("EIR Project") was evaluated. The EIR Project would demolish five of the six existing hospital buildings on the site, including the removal of three existing generators.

The EIR Project would construct or renovate 618,200 square feet of residential space, totaling 273 residential units, 86,200 square feet of private and common open space areas, and excavate 61,800 cubic yards for below-grade parking amounting to provide approximately 221,000 square feet of parking area. Overall, the EIR Project would transform approximately 629,000 square feet of existing hospital/residential uses to approximately 618,200 square feet of residential uses and reduce 439 existing parking spaces to 416 parking spaces.

The Project Sponsor has proposed modifications to the previously approved Project, which is studied herein and referred to as the Modified Project. Compared to the EIR Project, the Modified Project would increase residential density at the 3700 California Street site. As summarized in **Summary Table A**, the Modified Project would construct 493 total residential units, approximately 220 more units than analyzed in the 2020 EIR, add 74 institutional units for assisted living, add 4,812 square feet of public restaurant use, provide 7,218 square feet of on-site amenity restaurant use and provide 488 parking spaces. The detailed land use sizes are summarized in **Table 1**. The Modified Project would add 3 emergency

generators: one 100kW diesel generator located at building B1, a 200kW diesel generator located at building B2, and a 250kW diesel generator located at building C1. As a result, the changes to the proposed Modified Project would change the construction and operational activity compared to what was previously studied in the 2020 EIR.

The proposed modifications are summarized in **Summary Table A** below. The updates result in a new Project construction phasing schedule, as shown in **Figure 1,** updated construction equipment activity, and updated construction trip counts, as shown in **Tables 2-4**. The list of construction equipment is the same as the previously approved Project; however, the amount of time each piece will be used for each block has been updated. Compared to the previous analysis, the number of worker construction trips have decreased, the vendor trips are the same, and the number of hauling trips have increased. The 2020 EIR assumed that certain portions of the 4.9-acre site would be developed in three construction phases over a four-year period. While this still remains true, the major modification to the phasing schedule includes a shift in the timeline of each block, with the Project now set to begin with Block B instead of Block C and will commence in 2029 instead of 2021. Ramboll understands that the excavation depth will decrease from a maximum depth of 75 feet below grade to a maximum depth of 35.5 feet below grade compared to the 2020 EIR. As a result, the total excavation amount to be removed from the site decreased from 61,800 cubic yards to 33,600 cubic yards for the Modified Project.

Summary Table A: Project Characteristic Comparison

Characteristic	EIR Project	Modified Project
Number of Single Family Housing Dwelling Units	14	15
Number of Apartment Dwelling Units	259	478
Number of total residential units	273	493
Number of Assisted Living Dwelling units	--	74
Number of Parking Spaces	416	488
Restaurant Space (square feet)	--	4,812 (public) 7,218 (internal) 12,030 (total)
Health Club Space (square feet)	23,100 (internal)	--
Construction Duration	40 months	37 months
Construction Timeline	1. Block C 2. Block B 3. Block A	1. Block B 2. Block C 3. Block A
Excavation Amount (cubic yards)	61,800	33,600
Maximum Excavation Depth	Block A: 13 feet Block B: 75 feet Block C: 17 feet	Block A: 27.2 feet Block B: 35.5 feet Block C: 21.5 feet
Number of Generators[1]	--	3

[1] The EIR Project did not include any new on-site generators as part of the Project; however, the existing improvements for the prior hospital use includes 3 emergency generators.

METHODOLOGY

Ramboll proposes to conduct an analysis to determine the criteria air pollutants (CAPs) and health risk impacts from the Modified Project and compare to the findings in the 2020 EIR. Overall, the methods used in the 2020 EIR remain consistent for the updated analysis for the Modified Project, except as noted below due to updated emission factors and/or updates to the CEQA air quality guidance and recommendations.

PROPOSED AIR QUALITY ANALYSIS

Construction Emissions Estimation

For the 2020 EIR, Ramboll estimated CAP emissions from onsite offroad equipment and construction hauling and worker trips, using the EIR Project's construction phasing schedule and methods consistent with CalEEMod v2016.3.2. Emission factors for on-road vehicles were developed using EMFAC2017. CAP emissions were compared to the construction CAP significance thresholds established by the Bay Area Air Quality Management District (BAAQMD).

Construction CAP emissions during each year, including during overlapping phases, were determined to be less than the significance thresholds, indicating that no mitigation measures would be necessary. However, as discussed below, mitigation was needed for construction equipment for health risk assessment in the FEIR.

For this updated Project analysis, Ramboll will estimate CAP emissions from construction activities utilizing the new phasing schedule, updated construction equipment activity, and updated construction trip counts, as shown in **Tables 2-4.** Additionally, the analysis for the Modified Project will utilize emission factors that comply with Mitigation Measure M-AQ-3 from the 2020 EIR which requires construction activities to use lower emitting construction equipment. As such, all off-road equipment will utilize Tier 4 Final off-road emission standards. Construction CAP emissions in the 2020 EIR did not incorporate Mitigation Measure M-AQ-3. The effects of Mitigation Measure M-AQ-3 were only taken into account in the toxic air contaminant emissions. Ramboll will estimate the emissions from off-road construction equipment by using the updated construction equipment list and methodologies consistent with CalEEMod v2022.1.1.28, where off-road emission factors are based on raw OFFROAD2017 data.[2] Similarly, the on-road emission estimates will be updated using updated trip assumptions and EMFAC2021 emission factors for on-road vehicles.[3] The updated emissions models take into account regulations and fleet changes that have occurred since the 2020 EIR and would affect the emissions of the Project, which in general result in a reduction in emissions as newer, cleaner fleets for both on-road and offroad engines are utilized due to the later start date of project construction.

Emissions will not be estimated for the uncontrolled case where fleet average emission factors were used because the Modified Project would be required to comply with Mitigation Measure M-AQ-3. Ramboll will summarize the total construction emission estimates by year and compare the CAP emissions to the emissions estimated in the 2020 EIR.

Operational Emissions Estimation

For the 2020 EIR, Ramboll estimated operational CAP emissions using CalEEMod v2016.3.2, based on land uses associated with the EIR Project and existing land uses. Vehicle emissions were also calculated in CalEEMod v2016.3.2, using trip generation rates provided by the Project Sponsor and CalEEMod emission factors were updated to use EMFAC2017 emission factors. Emissions associated

[2] CAPCOA. 2022. CalEEMod User Guide Appendix G. Available at: https://caleemod.com/user-guide

[3] CARB. 2024. EMFAC. Available at: https://arb.ca.gov/emfac/

with existing land uses were subtracted from the total EIR Project operational CAP emissions to determine the net CAP emissions from project implementation. Since operations would overlap with construction, interim operational emissions were also added to construction emissions to represent worst-case scenarios. CAP emissions were then compared to the CAP significance thresholds established by the BAAQMD. Operational CAP emissions at the EIR Project's full buildout conditions were determined to be below the significance thresholds. Similarly, the combined CAP emissions from overlapping operations and construction phases were also below significance thresholds.

For the updated Project analysis, Ramboll will use CalEEMod v2022.1.1.28 to estimate updated operational CAP emissions from the Project and subtract the baseline existing emissions estimated in the 2020 EIR. Emissions will be based on Modified Project-specific information, including land use sizes, population, and vehicles miles travelled (VMT) and will otherwise utilize assumptions from the 2020 EIR or CalEEMod default assumptions when appropriate. Ramboll will update the CalEEMod default consumer product emission factor with the City of San Francisco's specific emission factor of 1.46E-05 pounds per square foot per day to reflect the updated information on consumer products usage since the 2020 EIR. Ramboll will use default energy usage for all land uses from CalEEMod v2022 to determine emissions from natural gas consumption.[4] In order to comply with BAAQMD Rule 6-3-306, the 2020 EIR assumed there would be no wood hearths or stoves and that all fireplaces would be natural gas. The updated analysis will make the same assumptions. Landscaping and operational architectural coating emissions were previously determined using CalEEMod v2016 emission factors which have been updated in the newer versions of CalEEMod. Ramboll will use the updated emission factors to reflect updated information about these sources since the previous analysis.

Mobile emissions will be calculated based on the updated project-generated VMT. Consistent with the 2020 EIR, the residential VMT will be based on the residential VMT per capita rates provided by the transportation consultant, and population estimates for the Modified Project. The restaurant land use was not considered in the 2020 EIR. For the Modified Project, the restaurant VMT will be based on the retail VMT per capita and the employment population estimate.

Ramboll will also include emissions from operations of the emergency generators within the operational emissions estimates. In compliance with the 2024 SF Planning Air Quality and Greenhouse Gas Analysis Guidelines, Ramboll will assume the emergency generators would operate for 50 hours per year for testing, maintenance, and emergency operations.[5] Additionally, Ramboll understands the Modified Project will use generators with Tier 4 engines. BAAQMD recently released updated Best Available Control Technology (BACT) Guidance for generators between 50 and 1,000 BHP. Accordingly, the Modified Project has committed to using Tier 4 engines as a Project design feature to meet this requirement.[6]

Health Risk Assessment

For the 2020 EIR, Ramboll evaluated health risks and $PM_{2.5}$ concentrations, using $PM_{2.5}$ and toxic air containment (TAC) emissions rates, resulting from the EIR Project on the surrounding community. Health risks and $PM_{2.5}$ concentrations were evaluated by summing the background risks, EIR Project

[4] If the Applicant decides to incorporate all-electric appliances in some or all of the land uses, then the results of the emissions evaluation would be conservative and CAP emissions would be lower than estimated.

[5] San Francisco Planning. 2024. Air Quality and Greenhouse Gas Analysis Guidelines. Available at: https://sfplanning.org/air-quality

[6] BAAQMD. 2024. Best Available Control Technology (BACT) Workbook – I.C. Engine – Compression Ignition, Emergency > 50 hp and < 1000 hp. Guideline. Available at: https://www.baaqmd.gov/en/permits/permitting-manuals/bact-tbact-workbook

risks, and risks from reasonably foreseeable cumulative projects not already included in the background risk and $PM_{2.5}$ assessment. The Project is in an area that meets the Air Pollutant Exposure Zone (APEZ) criteria, but areas to the north of the site do not meet APEZ criteria. With implementation of Mitigation Measure M-AQ-3, the lifetime cancer risk and $PM_{2.5}$ concentration contributions from the Project were below APEZ criteria thresholds at the maximally exposed offsite receptors. For onsite receptors in the APEZ, implementation of Mitigation Measure M-AQ-3 brought the EIR Project contribution to below the APEZ Project Contribution Significance Threshold. Therefore, it was determined that the EIR Project would result in less-than-significant cancer risk and $PM_{2.5}$ impacts with mitigation at both off-site and on-site receptors.

For this analysis, Ramboll will use TAC emission rates calculated using updated construction activity, the updated construction phasing schedule, and the updated emission factors to estimate health risks and $PM_{2.5}$ concentrations resulting from the Modified Project on the surrounding community. Because the construction area and phasing boundaries geometry have not changed from the evaluation for the 2020 EIR, Ramboll will utilize the AERMOD modeling performed for the 2020 EIR.[7] Exposure assumptions will be updated to be consistent with the updated 2022 BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans and the 2024 SF Planning Air Quality and Greenhouse Gas Analysis Guidelines.[8] Ramboll will update sensitive receptors to include worker receptors, which were not analyzed in the 2020 EIR.

Ramboll understands that the updated Project would include three emergency generators located at buildings B1, B2, and C1. Therefore, Ramboll will run AERMOD for the generators using BAAQMD recommended source parameters and will model the operational health risk impacts of the proposed generators on on-site and off-site receptors. Additionally, Ramboll anticipates any net positive traffic volumes on roadways generated by the updated Project would be less than the screening volumes in the 2024 SF Planning Air Quality and Greenhouse Gas Analysis Guidelines. Therefore, no operational mobile sources will be modeled for the health risk assessments.

Cumulative health risks and $PM_{2.5}$ concentrations will also be evaluated by summing the updated risks from Project construction and operations with the updated background risks from the 2020 San Francisco citywide health risk assessment. Additionally, Ramboll will review the updated analysis of nearby foreseeable future projects that may contribute to cumulative health risk impacts at the updated Project's receptors, if available, and update the corresponding impacts in the cumulative analysis. Ramboll assumes that a list of the foreseeable future projects will be provided by SF Planning and would including a nearby development project located at 3333 California Street. The cumulative assessment will be used to determine if the maximally impacted receptors are located in an area that meets the Air Pollutant Exposure Zone (APEZ) criteria for either cancer risk or $PM_{2.5}$ concentration. Accordingly, Ramboll will provide the project contribution risk values that can be compared to APEZ criteria thresholds and the total cumulative values.

[7] The AERMOD modeling from 2020 utilizes source parameters from historical guidance documents, including release height, initial lateral dimension, and initial vertical dimension for the area and volume sources. However, utilizing the same modeling for the Modified Project allows for a direct comparison of results due to the changes in the Modified Project.

[8] BAAQMD, 2023. 2022 Guidelines, Appendix E, Recommended Methods for Screening and Modelling Local Risks and Hazards. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?la=en. Revised on April 25.

TECHNICAL REPORTING

Following the completion of all analyses, Ramboll will prepare a technical Results Memo referring to this Methodology Memo and summarizing the results of the analysis. The Results Memo will also summarize any deviations in methodologies, assumptions, and/or parameters from the Methodology Memo. This memo will be written with the intent to submit to SF Planning for their review and implementation into an EIR addendum.

TABLES

Table 1
Land Use Summary for Proposed Project
3700 California Street
San Francisco, California

Project Land Uses by Block					
Block	**Project Land Use Type[1]**	**CalEEMod® Land Use Type**	**CalEEMod® Land Use Subtype**	**Value**	**Units**
A	Multi-family	Residential	Apartments Mid Rise	46	Dwelling Units
A	Townhomes	Residential	Condo/Townhouse	4	Dwelling Units
A	Townhome Parking Lot	Parking	Parking Lot	8	Spaces
A	Parking	Parking	Enclosed Parking with Elevator	58	Spaces
B	Multi-family	Residential	Apartments Mid Rise	274	Dwelling Units
B	Townhomes	Residential	Condo/Townhouse	11	Dwelling Units
B	Townhome Parking Lot	Parking	Parking Lot	22	Spaces
B	Parking	Parking	Enclosed Parking with Elevator	297	Spaces
C	Multi-family - Senior Housing	Residential	Apartments Mid Rise	158	Dwelling Units
C	Assisted Living and Memory Care	Institutional	Nursing Home	74	Dwelling Units
C	Restaurant - public	Commercial	Restaurant	4,812	sqft
C	Restaurant - community	Commercial	Restaurant	7,218	sqft
C	Parking	Parking	Enclosed Parking with Elevator	109	Spaces

Overall Project Land Uses					
Project Land Use Type[1]	**CalEEMod® Land Use Type**	**CalEEMod® Land Use Subtype**	**Value**	**Units**	**Area (sq ft)**
Multi-family	Residential	Apartments Mid Rise	478	Dwelling Units	663,726
Townhomes	Residential	Condo/Townhouse	15	Dwelling Units	
Assisted Living and Memory Care	Institutional	Nursing Home	74	Dwelling Units	56,523
Parking	Parking	Enclosed Parking with Elevator	494	Spaces	213,273
Townhome Parking Lot	Parking	Parking Lot	30	Spaces	
Restaurant - public	Commercial	Restaurant	4,812	sqft	4,812
Restaurant - community	Commercial	Restaurant	7,218	sqft	7,218

Notes:

1. Project land use type and square footage provided by the Project Developer.

Abbreviations:

CalEEMod® - California Emissions Estimator Model®

sqft - square feet

References:

California Air Pollution Control Officers Association (CAPCOA). California Emissions Estimator Model (CalEEMod®), Version 2022.1. Available online at http://www.caleemod.com/

Table 2
Construction Phasing Schedule
3700 California Street
San Francisco, California

Phase[1]	Subphase	Start Date	End Date	Number of Work Days	Days per Week
Block A	Demolition	09/16/26	01/12/27	80	5
	Site Preparation & Grading	12/29/26	01/26/27	20	5
	Drainage, Utilities, & Subgrade	12/29/26	05/26/27	105	5
	Excavation & Shoring	04/29/27	01/17/28	180	5
	Building Construction	05/06/27	04/03/29	480	5
	Sitework	08/16/27	12/13/28	335	5
Block B	Demolition	03/27/26	07/20/26	80	5
	Site Preparation & Grading	03/27/26	08/03/26	90	5
	Drainage, Utilities, & Subgrade	03/27/26	10/27/26	150	5
	Excavation & Shoring	08/04/26	02/02/27	125	5
	Building Construction	09/30/26	10/09/28	510	5
	Sitework	02/03/27	07/07/28	360	5
Block C	Demolition	06/08/26	11/10/26	110	5
	Site Preparation & Grading	06/08/26	11/24/26	120	5
	Drainage, Utilities, & Subgrade	06/08/26	05/19/27	240	5
	Excavation & Shoring	11/25/26	04/21/27	100	5
	Building Construction	04/22/27	03/06/29	470	5
	Sitework	07/17/28	11/06/28	80	5

Notes:

1. Construction schedule provided by the Project Developer.

Table 3
Construction Equipment
3700 California Street
San Francisco, California

Phase	Project Equipment[1]	Equipment Quantity[1]	Horsepower[1]	Daily Usage[1] (hours/day)	Percent of Active Equipment Usage Days[2]		
					Block A	Block B	Block C
Demolition	Aerial Lifts	1	63	2.0	15%	15%	16%
	Concrete/Industrial Saws	1	81	8.0	67%	67%	67%
	Cranes	1	231	8.0	15%	15%	16%
	Crawler Tractors	2	212	4.0	15%	15%	100%
	Dumpers/Tenders	4	16	8.0	67%	67%	67%
	Excavators	1	158	8.0	75%	75%	75%
	Forklifts	1	89	8.0	33%	33%	33%
	Generator Sets	1	84	6.0	67%	67%	67%
	Pumps	1	84	8.0	13%	13%	12%
	Rubber Tired Dozers	2	247	7.0	13%	13%	12%
	Skid Steer Loaders	2	97	7.0	67%	67%	67%
	Tractors/Loaders/Backhoes	1	97	8.0	67%	67%	67%
	Welders	1	46	4.0	33%	16%	33%
Site Preparation & Grading	Crushing/proc. Equipment	1	85	8.0	35%	35%	73%
	Dumpers/Tenders	4	16	8.0	78%	78%	100%
	Excavators	1	158	8.0	100%	100%	100%
	Pumps	1	84	8.0	100%	100%	100%
	Signal Boards	1	6.0	8.0	100%	100%	100%
	Sweepers/Scrubbers	1	64	2.0	100%	100%	100%
	Tractors/Loaders/Backhoes	1	97	8.0	100%	100%	100%
Excavation & Shoring	Bore/Drill Rigs	1	221	8.0	50%	50%	50%
	Crawler Tractors	1	212	8.0	13%	7%	6%
	Dumpers/Tenders	2	16	6.0	100%	100%	100%
	Excavators	1	158	8.0	75%	75%	75%
	Pumps	1	84	8.0	25%	25%	24%
Drainage/Utilities/ Subgrade	Cement and Mortar Mixers	1	9.0	4.0	6%	4%	7%
	Excavators	1	158	4.0	47%	29%	51%
	Plate Compactors	1	8.0	4.0	16%	10%	18%
	Rough Terrain Forklifts	1	100	2.0	47%	29%	51%
	Trenchers	1	78	4.0	47%	29%	51%
Building Construction	Bore/Drill Rigs	1	221	8.0	5%	5%	5%
	Cement and Mortar Mixers	1	9.0	4.0	20%	20%	20%
	Cranes[3]	1	-	-	-	-	-
	Dumpers/Tenders	1	16	8.0	20%	20%	20%
	Forklifts	1	89	4.0	75%	75%	75%
	Other General Industrial Equipment	1	88	6.0	20%	20%	20%
	Pressure Washers	1	13	2.0	5%	5%	5%
	Pumps	1	84	6.0	5%	5%	5%
	Rubber Tired Loaders	1	203	6.0	20%	20%	20%
	Sweepers/Scrubbers	1	64	2.0	5%	5%	5%
Sitework	Dumpers/Tenders	2	16	4.0	50%	50%	50%
	Excavators	1	158	4.0	50%	50%	50%
	Graders	1	187	8.0	4%	5%	5%
	Pressure Washers	1	13	2.0	50%	50%	50%
	Pumps	1	84	8.0	50%	50%	50%
	Sweepers/Scrubbers	1	64	2.0	14%	10%	10%
	Tractors/Loaders/Backhoes	1	97	4.0	25%	25%	25%

Notes:

1. Project offroad construction equipment information was provided by the Project Developer.
2. For equipment that is not used every day throughout the duration of a given subphase, the portion of time it will be used is reflected in the percent of active equipment usage days.
3. Cranes used during the building construction subphase for the construction of each block are electric powered. All other equipment is considered to be diesel-powered.

RAMBOLL

Table 4
Construction Trips
3700 California Street
San Francisco, California

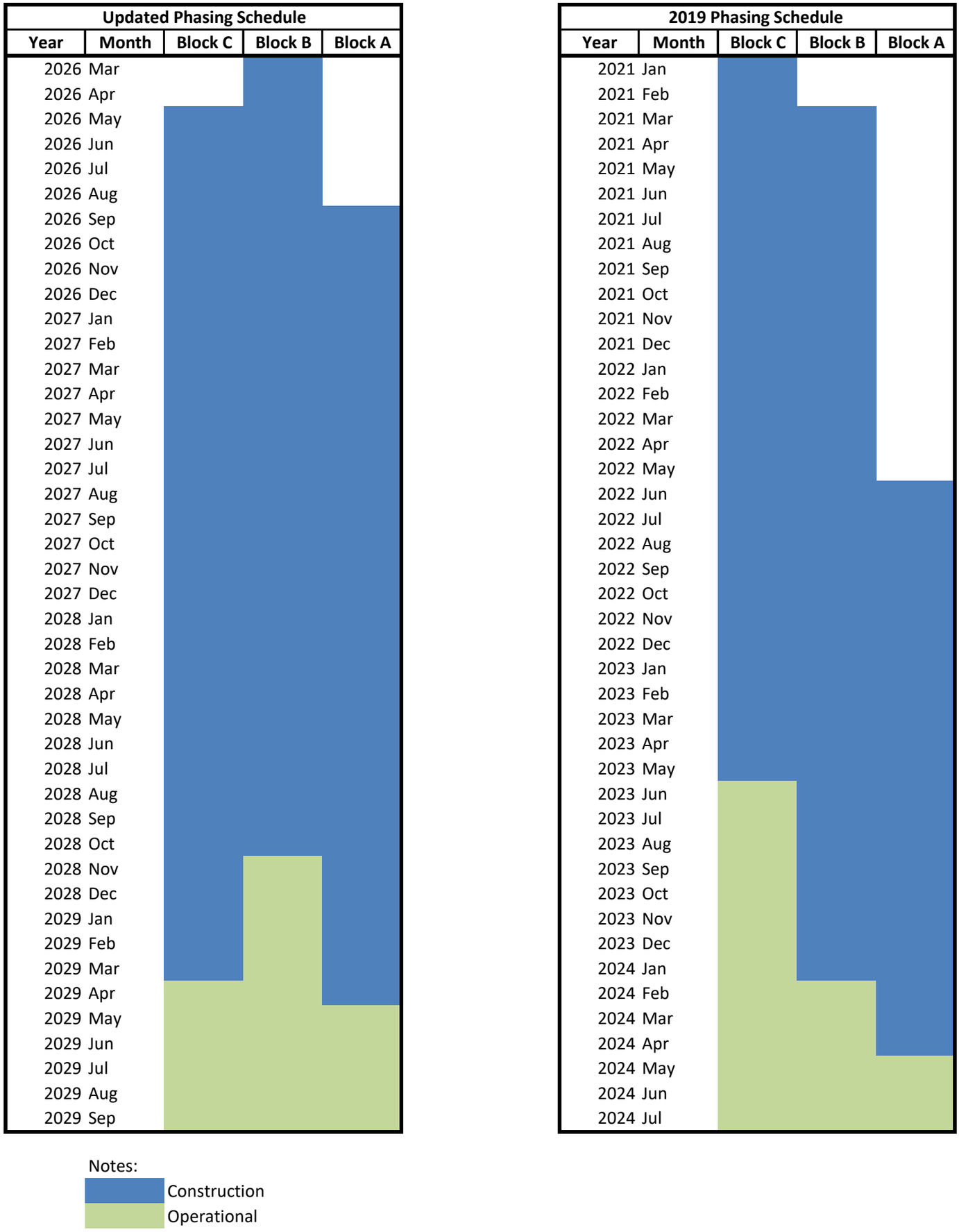
Phase	Construction Subphase	Construction Round Trips		
		Average Worker Trips[1] (trips/day)	Average Material Trips[1] (trips/day)	Hauling Trip[1] (trips/phase)
Block A	Demolition	12	0	640
	Site Preparation & Grading	8	0	0
	Drainage, Utilities, & Subgrade	7	0	0
	Excavation & Shoring	4	0	2700
	Building Construction	19	4.6	960
	Sitework	2	0	670
Block B	Demolition	48	0	640
	Site Preparation & Grading	15	0	0
	Drainage, Utilities, & Subgrade	27	0	0
	Excavation & Shoring	15	0	2250
	Building Construction	98	16	1020
	Sitework	8	0	720
Block C	Demolition	14	0	880
	Site Preparation & Grading	10	0	0
	Drainage, Utilities, & Subgrade	9	0	0
	Excavation & Shoring	3	0	1500
	Building Construction	78	8.9	940
	Sitework	21	0	160

Notes:

1. Construction trip rates were provided by the Project Developer for each block of construction. The number of trips represent the number of round-trip trips.

FIGURES

Figure 1. Phasing Schedule Comparison



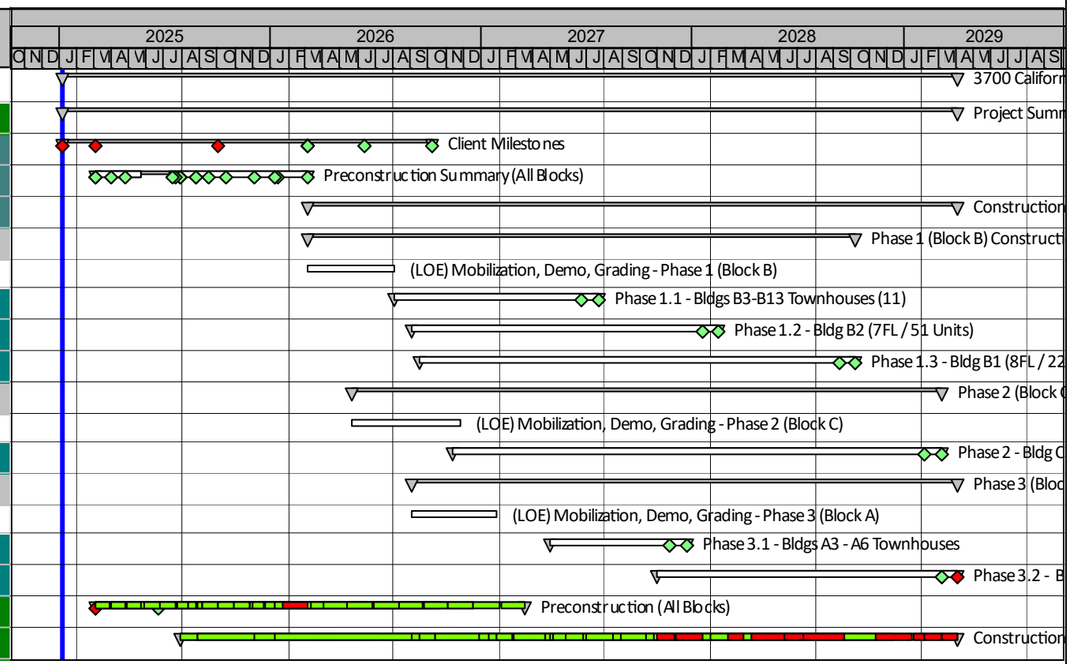
APPENDIX B: CONSTRUCTION SCHEDULE

Project ID: WBSF-3700-2
Print Date: 26-Jun-24, 09:50

3700 California - Acelerated Base Option Summary Schedule

WEBCOR

#	Activity ID	Activity Name	OD	Start	Finish
1		**3700 California - Base Accelerated Option - Block C Senior Housing**	1069	06-Jan-25	03-Apr-29
2		**Project Summary**	1069	06-Jan-25	03-Apr-29
3		**Client Milestones**	444	06-Jan-25	06-Oct-26
4		**Preconstruction Summary (All Blocks)**	255	03-Mar-25	05-Mar-26
5		**Construction Summary (All Blocks)**	775	06-Mar-26	03-Apr-29
6		**Phase 1 (Block B) Construction Summary**	655	06-Mar-26	09-Oct-28
7	A5150	(LOE) Mobilization, Demo, Grading - Phase 1 (Block B)	105	06-Mar-26	03-Aug-26
8		**Phase 1.1 - Bldgs B3-B13 Townhouses (11)**	245	04-Aug-26	23-Jul-27
9		**Phase 1.2 - Bldg B2 (7FL / 51 Units)**	365	01-Sep-26	14-Feb-28
10		**Phase 1.3 - Bldg B1 (8FL / 223 Units)**	520	16-Sep-26	09-Oct-28
11		**Phase 2 (Block C) Construction Summary**	700	22-May-26	06-Mar-29
12	A6590	(LOE) Mobilization, Demo, Grading - Phase 2 (Block C)	130	22-May-26	24-Nov-26
13		**Phase 2 - Bldg C1 (7 Fl / 157 Res / 75 Inst.)**	580	11-Nov-26	06-Mar-29
14		**Phase 3 (Block A) Construction Summary**	650	01-Sep-26	03-Apr-29
15	A6610	(LOE) Mobilization, Demo, Grading - Phase 3 (Block A)	100	01-Sep-26	26-Jan-27
16		**Phase 3.1 - Bldgs A3 - A6 Townhouses**	165	29-Apr-27	22-Dec-27
17		**Phase 3.2 - Bldg A1 - (5FL 46 Units)**	355	02-Nov-27	03-Apr-29
18		**Preconstruction (All Blocks)**	515	03-Mar-25	17-Mar-27
19		**Construction (All Blocks)**	925	30-Jul-25	03-Apr-29



Data Date: 06-Jan-25

APPENDIX C: HISTORIC RESOURCE REVIEW

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

HISTORIC RESOURCE REVIEW

Record No.:	2017-003559ENV-02
Project Address:	**3700 California Street**
Zoning:	RM-2 Residential – Mixed, Moderate Density & RH-2 Residential – House, Two Family Zoning District 80-E and 40-X Height and Bulk District
Block/Lot:	1015/001, 1015/052, 1015/053, 1016/001-009, 1017/27, 1017/028
Staff Contact:	Justin Greving- (628) 652-7553 Justin.greving@sfgov.org

Project Evaluation

The purpose of this HRR is to provide an updated project evaluation for a modified project since the EIR was certified by the Planning Commission on February 27, 2020. The findings of the original Historic Resource Evaluation Response Part I (HRER Part I, dated October 17, 2018) have not changed and the only identified historic resource on the site is the Marshal Hale Memorial Hospital building at 3698 California Street (referred to simply as 3698 California Street, or the Marshal Hale hospital building). 3698 California Street is a three-story hospital building designed in the Art Deco/Art Moderne style by local architect Emory M. Frasier and was constructed in 1939. 3698 California Street is individually eligible for listing in the California Register under Criterion 3 because it embodies the distinctive characteristics of Art Deco/Art Moderne institutional architecture. The period of significance is 1939, the building's date of construction. As summarized in more detail in the HRER Part I, 3698 California Street retains all aspects of integrity except for Setting.

The following is a list of character defining features identified in the previous HRER Part I for 3698 California Street:

- Rectangular plan, three-story massing
- Central pavilion that is three bays wide and two slightly recessed wings, each four bays wide, that extend along California Street to the east and west
- Recessed entry stepped up from the sidewalk that features
    - Terrazzo floor in three colors with brass divider strips that illustrate stylized flora and includes a dedication plaque which reads "Hahnemann Hospital – Erected by the Homeopathic Foundation of California"
    - Side panels of the entranceway with decorative stylized flora
    - Transom with an applied scroll pattern topped by a triangular pattern
- Art Deco features that include
    - Massing that emphasizes verticality
    - Symmetrical balancing of features
    - Recessed facades arranged in a series of setbacks emphasizing the geometric form

    - Low relief decorative elements and stylized flora patterns at the central pavilion entrance of the building including
        - Four fluted pilasters with flat trim that define its three bays
        - Two center pilasters with applied buttresses that rise midway up the second story
        - Blank recessed panel that forms the implied trabeation for the pilasters below bordered by a molded stylized daisy motif and flanked by square panels with bas-relief decoration
        - Stepped cornice with an applied decorative crest below
- Art Moderne features that include
    - Rounded corner canopy projecting over the recessed entrance
    - Smoothed stucco finish on exterior walls
- Steel sash windows arranged symmetrically across each bay and are slightly recessed from the front of the façade, creating pilasters typical of the Art Deco and Art Moderne styles

The interior of the Marshal Hale hospital building has undergone numerous alterations to allow for the installation and use of upgraded medical technologies and practices such that there is little to no historic fabric left. Therefore, there are no interior character-defining features.

While the findings of the HRER Part I, dated October 17, 2019, have not changed, this HRR supersedes the previous Part II Project Evaluation, dated 2/26/2019, that accompanied that previous HRER Part I.

Modified Project:		Per Drawings Dated:
☒ **Demolition / New Construction**	☒ **Alteration**	November 1, 2024

PROJECT DESCRIPTION

The modified project will still redevelop a portion of the former site of the California Pacific Medical Center (CPMC) campus at 3700 California Street similar to the proposal analyzed in the EIR (EIR project). The approximately 214,000-square-foot, 4.9 acre irregularly shaped project site encompasses 14 parcels on one full city block and on portions of two other blocks. The project site is bounded by California Street to the south, Arguello Boulevard to the west, Sacramento Street to the north, and Spruce Street to the east in the Presidio Heights neighborhood. The modified project would include the demolition of five of the six existing hospital buildings on the project site, adaptive reuse and expansion of the Marshal Hale Hospital building at 3698 California Street for residential and institutional uses, retention of the existing nine-unit residential building at 401 Cherry Street, and construction of 19 new residential buildings ranging from three to seven stories. In total the modified project would provide 493 residential units, including 15 single-family homes and four multi-family residential buildings, not including the nine existing units to be retained at 401 Cherry Street.

Alterations to 3698 California Street

The EIR project included retention, rehabilitation, and reuse of the 3698 California Street building, including demolition of later additions to bring the building back to its original 1939 rectangular floorplan. While the modified project will still include demolition of some later additions, the building itself will be incorporated as part of a larger seven-story mixed use building with multi-family senior housing as well as assisted-living and memory-care uses.

The rear wing of 3698 California Street, constructed in 1940; the rear additions, constructed in 1970/1971; as well as the later additions to the east wing would be demolished. In addition, the north façade and a portion of the east façade of 3698 California Street would be demolished for a connection to the proposed new buildings. The proposed new construction would be set back from the original façade of the building and the building elevations on California and Maple streets would be mostly retained. Specifically, the existing windows along each façade would be replaced with new windows that would match the originals in material, design, and operation. In addition, the existing door on the Maple Street façade would be removed and replaced with a new window. The entry on California Street would be retained as an access point but with the existing door removed and replaced with a new door that would match the material, design, and operation of the original. The existing design elements of the building would be retained, and the façades would be re-painted.

PROJECT EVALUATION

The modified project's conformance with the Secretary of the Interior's Standards:							
Standard 1 – Minimal Change:	☒ Yes	☐ No	☐ N/A	**Standard 6** – Repairment:	☒ Yes	☐ No	☐ N/A
Standard 2 – Maintain Character:	☒ Yes	☒ No	☐ N/A	**Standard 7** – Treatments:	☒ Yes	☐ No	☐ N/A
Standard 3 – Avoid Conjecture:	☒ Yes	☐ No	☐ N/A	**Standard 8** – Archeology:	☒ Yes	☐ No	☐ N/A
Standard 4 – Acquired Significance:	☒ Yes	☐ No	☐ N/A	**Standard 9** – Compatibility:	☒ Yes	☒ No	☐ N/A
Standard 5 – Building Techniques:	☒ Yes	☐ No	☐ N/A	**Standard 10** – Reversibility:	☒ Yes	☐ No	☐ N/A

*See **Project Impact Analysis** comments for additional information.*

Standard 1 - A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The modified project will convert use of the building from a hospital to residential use. This conversion is compatible with the character of 3698 California Street as the two uses cannot be distinguished from the exterior and the conversion does not require substantial change to accommodate the new use. All windows that currently function as windows will continue to be used as windows to maintain the hierarchy of entrances that centers on the main entrance located on the primary façade along California Street.

Therefore, the modified project is in conformance with Standard 1.

Standard 2 - The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

The most visible change will be the insertion of an addition to the north and east side of the building that will be seven stories tall. This addition will alter somewhat of the overall character of 3698 California Street's rectangular plan and three story massing because the new construction will be inserted to the north and east of the building and will be highly visible given the contrast in height between the original building and addition. However, as explained in more detail in Standard 9 analysis, there are specific modifications to the massing to reduce the contrast between the addition and 3698 California Street.

For the most part the modified project will retain the historic character of the property and will not require removal of historic materials or alteration of features and spaces that characterize the property. Most of the character defining features of 3698 California are located on the facades that face California and Maple Street, these will all be mostly retained.

Therefore, while there are some elements that are not in conformance, other elements of the modified project are in conformance with Standard 2.

Standard 3 - Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

The modified project will not add any conjectural features or architectural elements from other buildings and will not create a false sense of historical development.

Therefore, the modified project is in conformance with Standard 3.

Standard 4 - Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

While the original building featured a rectangular plan, 3698 California Street saw subsequent additions on the east and north elevations. The north elevation has a three story addition constructed ca. 1970 that connects the original 1939 building to the larger 1970/1971 addition, while the east elevation contains a small two-story addition at the east wing with a one-story addition that extends toward California Street. The three story addition to the north elevation will be demolished along with the one story addition that extends towards California Street. Because none of the additions to the original 1939 building have taken on significance, their removal does not detract from the original building's significance.

Therefore, the modified project is in conformance with Standard 4.

Standard 5 - Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.

The elements that communicate 3698 California's Art Deco and Art Moderne architectural style will be retained. The Art Deco details, such as the symmetrical balancing of features, recessed facades arranged in a series of setbacks, central pavilion entrance with fluted pilasters and applied buttresses, and low relief decorative elements and stylized flora patterns, will all be retained and preserved as part of the modified project. The Art Moderne features, including the rounded corner canopy projecting over the recessed entrance and the smoothed stucco finish on exterior walls, will also be retained in the modified project. These distinctive features and finishes that communicate the buildings Art Deco/Art Moderne significance will be preserved.

Therefore, the modified project is in conformance with Standard 5.

Standard 6 - Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design,

color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

The modified project will not retain the existing steel sash windows and they will be instead replaced with new windows that will match the original windows in material, design, and operation, which is to say the new windows will be steel sash 3 part multi lite windows. Although the existing windows will not be retained, the new windows will match the old windows in design, color, texture and materials and will therefore partially meet the goal of Standard 6. Other architectural elements along the facades that face Maple and California Street will be retained rather than replaced.

Therefore, the modified project is mostly in conformance with Standard 6.

Standard 7 - Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

The modified project does not anticipate use of any chemical or physical treatments that would cause damage to any historic materials.

Therefore, the modified project is in conformance with Standard 7.

Standard 8 - Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Archeological resources will be treated as part of a standard archeological mitigation measure outlined in the Initial Study to ensure that if archeological resources are disturbed, mitigation measures shall be undertaken.

Therefore, the modified project is in conformance with Standard 8.

Standard 9 - New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

The modified project includes the construction of a new addition to 3698 California Street. This new addition will be seven stories tall in comparison with the existing building which is only three stories, and will extend to the north and east of the current building. Because the height and massing of the new addition will be substantially taller and larger than the existing building at 3698 California Street, a number of setbacks and reveals have been incorporated within the new addition so as to provide some physical and aesthetic separation between the new addition and the existing historic building.

Although the new addition directly behind 3698 California Street will be seven stories tall, it will be set back from the primary façade along California Street. While the setback will be more than 23 feet in most locations, the addition will be set back further at the west and east ends of the historic building; the setback from the primary façade will be more than 49 feet at the southwest corner of the building and 39 feet at the

southeast corner of the building. These deep setbacks will help to establish 3698 California's aesthetic separation from the new addition by sculpting the massing of the new construction so that it is understood as visually separate from the original building. The increased setbacks at the building edges will further reinforce the original building's massing and corners by maintaining the entirety of the Maple Street façade and most of the east elevation to help it maintain the appearance of being a stand-alone structure.

The overall massing that sits directly north of the existing building will be sculpted so as to be sensitive to 3698 California's overall massing and central pavilion. The new addition will incorporate a stepped façade that will align with where the building's central pavilion steps forward from the California Street façade to provide emphasis to the building's original composition. This central portion of the addition that sits forward of the addition's main mass will also be lower in height than the rest of the addition so as to further reinforce the symmetrical hierarchy of the original building.

In addition to the deep setbacks along California Street, the Maple Street façade of the original building will be maintained. Furthermore, the addition will be setback from the Maple Street façade by approximately 14 feet so that a portion of the historic building's north elevation will remain intact thus retaining the western edge of the original building. The deep setbacks from California and Maple Steet that allow for the historic portion of the building to remain will create an aesthetic separation from the addition that will help create the illusion that the historic building is a separate structure at the corner of California and Maple streets.

Along California Street, the easternmost two story addition to 3698 California Street will be retained and will provide a buffer between the historic building and new addition. This already existing addition will create a smooth transition between the historic building and the new addition. Combined with the new addition's deep setback from California Street façade (39 feet) that retains the historic building's east elevation in its entirety, the separation provided by the existing two story addition will give the impression that the new addition is a separate building from 3698 California.

The materials of the new addition that is directly north of the historic building will be predominantly stone veneer on the ground floor with a brick veneer on the upper floors. Other architectural details will include a cast stone or GFRC (Glass Fiber Reinforced Concrete) trim stringcourse panel at the upper floor and at the cornice line and brick coining along the building edges. The addition will also feature a regular rhythm of punched openings for vertically oriented rectangular windows. The use of brick and stone veneer will create a rear addition that is visually distinguishable from the historic building thus reinforcing the impression that the rear addition is a separate building, however the uniform punched openings will harmonize the new addition with the historic building which itself features a regular rhythm of punched openings and vertically oriented rectangular windows. The architectural detailing of the new addition that is immediately east of 3698 California Street will have a different material palette and fenestration pattern to give the impression that this portion of the addition is an entirely different building.

Although the new addition will be 4 stories taller than the existing historic building, the setbacks and sculpting of the massing along with the difference in material palette will distinguish the addition physically and aesthetically from the historic building. Even if the seven story massing will still be highly visible, the setbacks, sculpted massing, and material differentiation of the addition will help to reduce the visual impact of the new addition in relation to the existing historic building and protect its integrity.

Therefore, while there are some elements that are not in conformance, other elements of the modified project are in conformance with Standard 9.

Standard 10 - New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

In the highly unlikely event that the modified project were to be removed at some point in the future, it would be difficult, but not entirely impossible, to separate the addition from the historic building. The partially removed floorplates and rear elevation that will be removed to connect the addition to the historic building would need to be reconstructed. However, the main components of the building that communicate its significance which are primarily located at the west and south facades would remain intact and would be unimpaired.

Therefore, the modified project is mostly in compliance with Standard 10.

PROJECT DETERMINATION

Based on the Historic Resource Identification, the project's scope of work:

☐ **Will** cause a significant adverse impact to the **individual historic resource** as proposed.
☐ **Will** cause a significant adverse impact to a **historic district / context** as proposed.

☒ **Will not** cause a significant adverse impact to the **individual historic resource** as proposed.
☐ **Will not** cause a significant adverse impact to a **historic district / context** as proposed.

PROJECT IMPACT ANALYSIS

Based on the above evaluation of the modified project the planning department finds some aspects of the project are not entirely in conformance with the Secretary's Standards. However, the planning department finds that the modified project, even if not entirely in conformance with all 10 standards, will not cause material impairment to the historic resource, the Marshal Hale hospital building. Although the massing of the new addition will be highly visible given it will be seven stories tall in comparison with the historic building's three story height, the incorporation of setbacks, articulations to the massing, and use of different materials ensure that the new addition will be distinct from the historic building and the modified project will not materially alter in an adverse manner the physical characteristic of the historic resource.

Although the new addition will be four stories taller than the historic building, as explained in more detail above in the Standard 9 analysis, it will incorporate a number of setbacks and reveals so as to reduce the visibility of the addition but also to make the existing historic building still appear somewhat separate from the new addition. These setbacks will allow three of the four elevations of the historic building to be mostly retained thus preserving most of the building edges to give the impression that the historic building is distinct and separate from the addition. The deep reveals of the addition will allow both the east and west elevations to remain mostly intact, along with retaining a portion of the northwest corner of the building so that it will still read as a separate structure that is distinct from the new addition. While the modified project will incorporate materials that are different from the historic building, this difference in materials will help distinguish it as a separate structure that is different from the historic building. Additionally, the fenestration

of the addition will feature a regular rhythm of punched openings with vertically oriented windows so as to not be so different architecturally to distract from the historic building.

Staff finds that the modified project will not cause a significant impact to the identified historic resource. However, the larger redevelopment of the CPMC California Campus will result in the removal and replacement of hospital buildings surrounding the historic resource with new residential buildings. While changes have already occurred to the setting of the Marshal Hale hospital building due to changes at the CPMC California Campus over time, the modified project will further reduce the historical integrity of the resource's setting and association. However, the historic resource will retain integrity of location, workmanship, design, materials, and feeling and therefore would retain its historical integrity. The following improvement measure (**Historic Resource Interpretation)** would help convey the historic setting and association of the resource by interpreting for the public the resource's historic medical context.

The modified project includes the construction of an addition to the identified historic resource, which will not cause a significant impact. However, the surrounding construction activities have the potential to cause damage to the existing resource, which would be a significant impact. The Mitigation Measure (**Historic Preservation Plan and Protective Measures**) will assist in ensuring that the resource will not be damaged during adjacent modified project construction.

Below are measures that will help minimize the impact of the larger redevelopment of the CPMC California Campus to the Marshal Hale hospital building by providing a context for understanding the resource's significance and ensuring the protection of the resource during construction. The below measures would ensure that adjacent construction activities shall not damage the historic resource and that the history of the historic resource and the larger hospital complex are interpreted for the public. Application of these measures will ensure significant impacts during construction do not occur and would further reduce the less than significant impact to the setting of the resource.

MITIGATION MEASURES

Implementation of the following Improvement and Mitigation Measures would ensure that the modified project would not cause material impairment to 3698 California and the impact to historic resources would be less than significant.

Improvement Measure: Historic Resource Interpretation
The project sponsor should provide a permanent display of interpretive materials concerning the history and architectural features of the Marshal Hale hospital building as well as the history of the CPMC California Campus. The historic interpretation should be supervised by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards and conducted in coordination with an exhibit designer. The interpretative materials (which may include, but are not limited to, a display of current and historical photographs, news articles, artifacts associated with the hospital, and video recordings) should be placed in prominent public settings. A proposal describing the general parameters of the interpretive program should be approved by the planning department's preservation staff prior to issuance of a site permit. The substance, media, and other elements of such an interpretive display should be approved by the planning department's preservation staff prior to issuance of a temporary certificate of occupancy for Block 1017.

Construction activity surrounding the Marshal Hale hospital building, which would occur as part of the project, has the potential to demolish or alter in an adverse manner the physical characteristics that convey the resource's historical significance. Specifically, construction occurring adjacent to the Marshal Hale hospital building may cause structural or architectural damage to the characteristics that qualify the resource for listing in the California Register. Heavy equipment would be used to demolish the non-contributing rear addition to the Marshal Hale hospital building as well as surrounding hospital facilities and then construct new buildings within the surrounding project site. Excavation would be required in the vicinity of the resource to construct new building foundations. These activities would occur in proximity to the retained façades of the Marshal Hale hospital building; therefore, its character-defining features could sustain damage if construction equipment were to inadvertently come into contact with the resource. As a result, the project's impact on the Marshal Hale hospital building would be significant. **Mitigation Measure: Historic Preservation Plan and Protective Measures for 3698 California Street** has been identified to ensure that the character-defining features of the Marshal Hale hospital building would not be permanently damaged by construction activities occurring adjacent to the resource. With implementation of **Mitigation Measure: Historic Preservation Plan and Protective Measures for 3698 California Street**, the overall historic integrity of the Marshal Hale hospital building would be retained, and the physical characteristics that convey its historical significance would not be demolished or altered in an adverse manner. Therefore, **Mitigation Measure: Historic Preservation Plan and Protective Measures for 3698 California Street** would reduce the project-related impact on historical resources to a less-than-significant level.

Mitigation Measure: Historic Preservation Plan and Protective Measures for 3698 California Street

A historic preservation plan and protective measures shall be prepared and implemented to aid in preserving and protecting those historical resources that would be retained and rehabilitated as part of the project. The historic preservation plan shall be prepared by a qualified historic preservation architect who meets the Secretary of Interior's Professional Qualification Standards (36 CFR, Part 61), and the project sponsor shall ensure that the contractor follows the plan. The preservation and protection plan, specifications, monitoring schedule, and other supporting documents shall be incorporated into the building or site permit application plan sets for Block 1017, and all documentation shall be reviewed and approved by the planning department's preservation staff.

Implementation of the historic preservation plan shall ensure that the modified project meets all requirements by establishing measures to protect retained building façades and character-defining features from construction equipment that could inadvertently damage historic resources. Specifically, the preservation plan shall incorporate construction specifications that require the construction contractor(s) to use all feasible means to avoid damage to the historic building, including, but not necessarily limited to, staging equipment and materials as far as possible from the historic building to avoid direct impact damage, maintaining a buffer zone when possible between heavy equipment and historical resources, appropriately shoring excavation sidewalls to prevent the movement of adjacent structures, designing and installing new adjacent foundations so as to minimize any uplift of soils, ensuring adequate drainage from adjacent sites, covering the roofs of adjacent structures to avoid damage from falling objects, and ensuring appropriate security to minimize risks related to vandalism and fire. The consultant shall conduct regular periodic inspections of the historic building during ground-disturbing activities on the project site. Should damage to the building occur, the building shall be remediated to its preconstruction condition at

the conclusion of ground-disturbing activity on the site and fixed during rehabilitation of the resource.

*See **Cumulative Impacts Analysis** comments for additional information.*

Cumulative Impacts

The geographic context for cumulative impacts on historical resources is typically confined to projects in the vicinity of the project site. Three reasonably foreseeable projects within 0.25 mile of the project site include a four-story residential building proposed at 3641 California Street (Case No. 2018-007764ENV), a four-story residential building and below-grade parking structure at 3637-3657 Sacramento Street (Case No. 2007.1347E), and a mixed-use development proposed at 3333 California Street (Case No: 2015-014028ENV). The modified project site does not fall within the boundaries of a historic district; none of the three reasonably foreseeable projects is located within a historic district, either. As such, the modified project, when considered with the three reasonably foreseeable projects, would not result in a cumulative impact on any historic district.

With regard to potential impacts on the Marshal Hale hospital setting, as discussed in **Mitigation Measure: Historic Preservation Plan and Protective Measures for 3698 California Street**, the Marshal Hale building's setting currently lacks integrity. Furthermore, two of the three reasonably foreseeable projects would be far enough from the project site so as not to act in combination with one another and further diminish the setting of the Marshal Hale hospital building. The 3333 California Street project would be more than two and one-half blocks east of the project site, resulting in a limited visual change in the character of the California Street streetscape, as viewed from the vicinity of the Marshal Hale hospital building. This project would introduce mixed-use buildings that would be generally consistent with the scale of buildings that currently line California Street in the vicinity of the 3700 California Street and 3333 California Street development sites. Likewise, the 3637–3657 Sacramento Street development site, one block north of California Street, would not cause a discernible change in the setting of the Marshal Hale hospital building. The building at 3641 California Street would replace an existing building across California Street, opposite the Marshal Hale hospital building. Although the new building would be visible across the street from the Marshal Hale hospital building, it would generally conform to the development pattern (in terms of scale and placement of the front façade at the lot line) of the mixed residential and commercial district in the vicinity and therefore would not further diminish the setting of the Marshal Hale hospital building. In light of the above, the modified project, considered with the three reasonably foreseeable projects, would not result in a cumulative impact on historical resources.

CONCLUSION

The modified project is in conformance with most of the Secretary's Standards but is not fully in conformance will all 10 standards. However, the modified project will not cause material impairment to the identified historic resource such that it would no longer retain its eligibility for listing in the California Register. The Improvement Measure identified above would help convey the historic setting and association of the resource by interpreting for the public the resource's historic medical context. Additionally, the potential adverse impacts of caused by the modified project's construction can be reduced through the implementation of the Mitigation Measure outlined above. Implementation of the Improvement and Mitigation Measure would reduce the project's impacts on the historic resource to a less than significant level (LSM). Therefore, the modified project will have a less than significant impact on historic resources with the implementation of mitigation measures.

Project Evaluation: Principal Preservation Planner Review

Signature: _____ Date: 1/10/2025

Elizabeth Gordon-Jonckheer, *Principal Preservation Planner*
Historic Preservation Team Lead for Districts 1, 2, 5 & 8

CC: Jeff Horn, *Senior Current Planner*
Team 1-2, Current Planning Division
Sherie George, *Senior Environmental Planner*
Environmental Planning Division

HRR ATTACHMENTS:

☐ Architectural Plans, dated: _____
☐ HRR / Supplemental, dated: _____