

**3333 CALIFORNIA STREET MIXED-USE PROJECT  
APPLICATION FOR ENVIRONMENTAL LEADERSHIP  
DEVELOPMENT PROJECT**

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## INTRODUCTION

The Project Sponsor, Laurel Heights Partners, LLC, is submitting this Application for certification of the 3333 California Street Mixed-Use Project as an Environmental Leadership Development Project (ELDP), pursuant to AB 900, the Jobs and Economic Improvement through Environmental Leadership Act of 2011, as amended effective January 1, 2018, and codified in Public Resources Code Section 21178 et. seq. Although codified within the California Environmental Quality Act (CEQA), the process for certification of the project as an ELDP is separate from all but a few of the steps required for preparing a CEQA environmental review document.

## PROJECT DESCRIPTION

### Proposed Development Project

The project site, an approximately 10.25-acre parcel in San Francisco's Laurel Heights/Jordan Park neighborhood, is developed with a 1950s-era corporate campus featuring a four-story office building at the center of the site, a three-level, partially below-grade parking garage, a one story annex building, three surface parking lots, two circular garage ramp structures leading to below-grade parking levels, and mature landscaping or landscaped open space. A portion of the space in the surface parking lots accommodates 60 parking spaces allocated to public use, with payment.

The project sponsor, Laurel Heights Partners, LLC, owns the site and leases it to the Regents of the University of California, which uses the project site for its University of California San Francisco (UCSF) Laurel Heights Campus. Prior to the project sponsor's recent acquisition of fee title to the site, the project sponsor had entered into a 99-year pre-paid ground lease with the Regents in 2014. The office building provides space for UCSF administrative, academic research, and social and behavioral science department uses (including common areas) and space for accessory uses and support programs, such as a daycare center, a conference center/auditorium, and a cafeteria.

The project sponsor is proposing to redevelop the site with adaptively reused and new buildings and shift the primary use from office to residential. The 14,000-gross-square-foot annex building and the two garage ramp structures would be demolished, and the three surface parking lots would be removed. The 455,000-gross-square-foot office building would be partially demolished, divided into two separate buildings (Center Buildings A and B), connected by a covered bridge, expanded to include two to three new levels, and adapted for residential use. A total of 13 new buildings—the Plaza A, Plaza B, Walnut, Masonic, Euclid, and Mayfair buildings, and the Laurel Duplexes (seven buildings)—would be constructed along the California Street, Masonic Avenue, Euclid Avenue, and Laurel Street edges of the project site. **Attachment A**, Project Drawings, provides a site plan, elevations of buildings along each street frontage, and representative floor plans of proposed buildings. **Attachment B**, Project Photo-simulations, presents the proposed project in context of existing surrounding streets and buildings.

All of the renovated or new buildings except one, the Walnut Building, would contain residential uses; the Walnut Building would provide space for two different uses—office and a childcare center. Retail space would be provided on the ground floor in the proposed Plaza A, Plaza B, Walnut, and Euclid buildings. Overall, the proposed project would include 558 dwelling units within 824,691 gross square feet of residential floor area; 49,999 gross square feet of office floor area; 54,117 gross square feet of retail floor area; a 14,690-gross-square-foot childcare center; 428,773 gross square feet of parking with 895 parking spaces; and approximately 236,000 square feet of open areas.

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The proposed parking program would replace the existing 543 surface and subsurface parking spaces on the project site and would provide 352 more parking spaces than are currently on the site. The spaces would be allocated to offer 558 spaces for residential uses, 138 spaces for retail uses, 100 spaces for office uses, 29 spaces for the childcare use, 60 spaces for commercial (paid) parking, and 10 spaces for car-share vehicles. Four separate below-grade parking garages with 883 spaces are planned: the California Street Garage, which would be constructed under the Plaza A, Plaza B, and Walnut buildings; the Center Building B Garage, which would encompass the two renovated below-grade parking levels under Center Building B; the Masonic Garage, which would be developed under the Masonic and Euclid buildings; and the Mayfair Garage, which would be developed under the Mayfair Building. In addition, six two-car parking garages would be provided for the Laurel Duplexes. The seventh Laurel Duplex would have two parking spaces in the Masonic Garage.

The project site is proposed to be laid out so that it would be newly integrated with the existing street grid. New pedestrian promenades would align with Walnut Street and connect to Masonic and Euclid avenues (north/south direction), and with Mayfair Drive connecting to Presidio and Masonic avenues and Pine Street (east/west direction) These interior promenades would be closed to vehicular traffic, except at the Walnut Street extension a short distance into the site where a driveway and roundabout would allow for passenger drop-off and pick-up as well as provide access to the California Street Garage. Sidewalks along the project boundaries on Presidio Avenue, Masonic Avenue, Euclid Avenue, and Laurel Street would be widened.

Approximately 53 percent of the overall lot area (approximately 236,000 square feet, excluding green roofs) would be retained as open area, with portions developed as a combination of common open space (some of which would be open to the public) and private open space such as ground-level terraces, interior courtyards and private internal walkways. Overall, the proposed project would provide approximately 103,000 square feet of common useable open area that meets the San Francisco Planning Code section 135 definition of open space. New landscaped open space would be added throughout the project site. The proposed project would remove 185 of the approximately 195 trees on the site, retaining 10 of the mature trees. The 15 street trees along California Street would be removed and replaced. The project includes installation of 270 replacement trees on the project site plus 92 street trees to be planted along California Street, Masonic Avenue, Euclid Avenue and Laurel Street.

The project sponsor is considering a project variant, the Walnut Building Variant, that would change the uses and height of the proposed Walnut Building. With the variant, the building's proposed office space would be replaced with residential uses, three new residential floors would be added, and the retail space and the childcare center space would be reduced. Overall, with the variant there would be 186 additional residential units, for a total of 744 residential units within 978,611 gross square feet of residential floor area; no office space; 48,593 gross square feet of retail floor area; a 14,650-gross-square-foot childcare center; and 435,133 gross square feet of parking with 971 parking spaces. The amount of space devoted to open areas would be the same as under the proposed project.

The proposed project or variant would be constructed in four overlapping development phases, with full build-out expected to occur approximately seven years after project entitlements, if executed from start to finish of the prescribed overlapping development phases.

The project sponsor submitted a Transportation Demand Management (TDM) Plan Application to the San Francisco Planning Department in August 2017 and has agreed to implement selected TDM measures, such as improving walking conditions and providing onsite child care, bicycle parking, and car share parking, to reduce per capita automobile use. The project sponsor has committed to meeting and exceeding the requirements of the San Francisco Green Building Ordinance (part of the San Francisco Building Code) by achieving Leadership in Energy and Environmental Design (LEED) for Neighborhood

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Development certification at a minimum Gold level for the full development. The Applicant is considering living (green) roofs, solar photovoltaic systems for some roofs, solar thermal hot water systems for other roof areas, and water-smart landscaping, among other sustainability features. Each of the new buildings would comply with the San Francisco Non-Potable Water Ordinance that requires use of onsite alternate water sources including graywater and/or rainwater.

The proposed project would include affordable housing units as required under San Francisco Planning Code section 415 and/or as set forth in a Development Agreement (DA) for the proposed project between the project sponsor and the City. The terms of the DA regarding provision of affordable housing and other matters are still under discussion, and, in addition, the project sponsor is gathering community input regarding this matter.

## **Project Site**

3333 California Street is a Midcentury Modern-designed corporate campus originally constructed in 1956-1957. The approximately 10.25-acre project site occupies Lot 003 on Assessor's Block 1032 in the Laurel Heights/Jordan Park area of San Francisco's Presidio Heights neighborhood. The irregularly shaped parcel is bounded by California Street to the north (an approximately 730-foot-long frontage), Presidio Avenue to the east (an approximately 280-foot-long frontage), Masonic Avenue to southeast (an approximately 422-foot-long frontage), Euclid Avenue to the south (an approximately 348-foot-long frontage), and Laurel Street/Mayfair Drive to the west (an approximately 742-foot-long frontage).

The campus contains a four-story office building with three levels of partially below-grade parking; a one-story annex building (which contains equipment such as boilers, chillers and water treatment facilities for the office building, other plant operations systems, office space for the physical plant engineers, and unused laboratory office space) at the northwestern corner of the project site; approximately 2.75 acres of surface parking in three lots; and 3 acres of designed landscape or landscaped open space. Approximately 63 percent of the site is covered by buildings or other impermeable surfaces, such as internal roadways and surface parking lots, and 37 percent is landscaping or landscaped open space. UCSF currently grants public access to the grass lawns on the site at the corner of Euclid Avenue and Laurel Street, extending partially down Euclid Avenue, and at Presidio Avenue just north of the Masonic Avenue and Pine Street intersection.

The project site is well-served by Muni transit service, with the 1 California, 1 BX California Express (AM and PM peak hours only), and 2 Clement bus routes on California Street; the 3 Jackson bus route on Presidio Avenue, California Street, and Walnut Street; and the 43 Masonic bus route on Presidio Avenue.

The area in which the project site is located is highly urbanized and essentially fully built out. Low- to mid-rise mainly multi-family residential uses surround the project site to the north, east, and south, across California Street, Presidio Avenue, and Euclid Avenue. The west side of Laurel Street across from the project site is lined by single-family houses between Euclid and Mayfair avenues. Other nearby land uses include the SF Fire Credit Union, at the southwest corner of California Street and Presidio Avenue, adjacent to the project site; the Jewish Community Center of San Francisco, across California Street from the project site; San Francisco Fire Station 10, across Masonic Avenue southeast of the project site; the San Francisco Municipal Railway's (Muni) Presidio Yard bus storage depot, across Euclid and Masonic avenues south of the project site; and the Laurel Village Shopping Center along California Street, across Laurel Street west of the project site.

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## CONSISTENCY WITH STATUTORY REQUIREMENTS FOR CEQA STREAMLINING

This Application was prepared in accordance with the Governor's Guidelines for Streamlining Judicial Review under CEQA, provided on the Governor's Office of Planning and Research (OPR) website and updated in January 2018 to comply with Senate Bill 734 (2016) and Assembly Bill 246 (2017).<sup>1</sup> The following information (including all Attachments) is submitted to show that the project and variant each satisfies the statutory requirements for CEQA streamlining, as further set forth in the Governor's Guidelines, pursuant to Public Resources Code Section 21187 *et seq.*

### **1. Information to show the project or variant is residential, retail, commercial, sports, cultural, entertainment, or recreational in nature.**

The proposed project or variant is residential, commercial, and retail in nature. As explained above, the proposed project would have approximately 558 dwelling units, 49,999 gross square feet of office floor area, 54,117 gross square feet of retail floor area, and a 14,690-gross-square-foot childcare center, in addition to parking, circulation and loading space, and approximately 236,000 square feet of open space. The project variant would replace the office space with 186 additional dwelling units for a total of 744 units, approximately 48,593 gross square feet of retail space and a 14,650 gross square foot childcare center, with parking, circulation and loading space and open space similar to the proposed project.

The proposed project and variant would demolish a portion of the existing office building and adapt it for residential use. The perimeter of the site is proposed to be developed with 13 new buildings, with all except the Walnut Building containing primarily residential uses (with ground floor retail in some buildings). The Walnut Building, located at the Walnut Street entrance to the project site from California Street, is proposed with office, childcare, and retail uses. The new buildings would front on California Street, Masonic Avenue, Euclid Avenue, and Laurel Street. The variant would construct residential, childcare, and retail uses in a taller Walnut Building, replacing the proposed office use.

Open space would be provided on the site in the form of public plazas and walkways, and as private open space for the use of new residents. A total of approximately 236,000 square feet of open space is included, excluding green roofs. One of the publicly accessible open areas, the proposed Euclid Green, would maintain most of the existing open space along Euclid Avenue to which UCSF has been granting public access (although privately owned).

The site plans for the proposed project and variant are included in **Attachment A**. Several renderings of the proposed project in the existing urban context are shown in **Attachment B**.

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<sup>1</sup> Governor's Office of Planning and Research, *Governor's Guidelines for Streamlining Judicial Review under the California Environmental Quality Act Pursuant to AB 900 (Chapter 352, Statutes of 2011)*, available at [http://opr.ca.gov/docs/20180103-AB\\_900\\_Guidelines\\_January\\_2018.pdf](http://opr.ca.gov/docs/20180103-AB_900_Guidelines_January_2018.pdf). Accessed July 11, 2018.

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**2. Information to show that the project or variant, upon completion, will qualify for LEED Gold Certification or better. The Application shall specify those design elements that make the project or variant eligible for LEED Gold Certification, and the Applicant shall submit a binding commitment to delay the project or variant until it receives LEED Gold Certification or better. If, upon completion of construction, LEED Gold Certification or better is delayed as a result of the certification process rather than a project deficiency, the Applicant may petition the Governor to approve project operation pending completion of the LEED certification process.**

The design for the proposed project or variant would meet or exceed current uniform codes, and is created to achieve at the minimum a Leadership in Energy and Environmental Design (LEED) Neighborhood Development (ND) Gold rating. The LEED ND certification has four certification levels that correspond to the number of credits that are achieved in five categories: Smart Location and Linkage (SLL), Neighborhood Pattern and Design (NPD), Green Infrastructure and Buildings (GIB), Innovation (IN), and Regional Priority (RP). The number of points that a project earns within the credits it achieves determines the level of certification that it will receive:

- LEED Certified™: 40-49 points earned
- LEED Silver®: 50-59 points earned
- LEED Gold®: 60-79 points earned
- LEED Platinum®: 80+ points earned.

LEED provides a level of flexibility for projects to choose the credits and project features that will contribute to certification. The proposed project and variant will each integrate low-impact development and transportation demand management, energy efficiency, water conservation, and other green-building practices to achieve a minimum LEED ND Gold certification; however, at the time of submitting this Application, the exact LEED credits that would contribute to the achievement of LEED ND Gold certification (i.e., 60-79 LEED points) have not yet been determined. That said, most or all of the following features will contribute to LEED certification.

In the charts below, “yes” indicates high confidence points and “likely” indicates other anticipated points. Additional points will also be targeted as the design develops to increase confidence in achievement of LEED Gold. The stars (\*) indicate prerequisites, which are required for all LEED certifications and carry no points.

#### SMART LOCATION AND LINKAGE (SLL)

A proposal earns many conservation and proximity credits by virtue of its location. The project or variant is situated on a previously developed infill site that is served by existing water and wastewater infrastructure and within walking distance of enough full-time equivalent jobs to serve the anticipated number of residents. Additionally, transit access credits are earned through existing service: multiple types of transit service currently serve this site, with numerous trips made daily. All trips are made available to 100% of the proposed dwelling units.

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**Smart Location and Linkage – LEED ND v4 Preliminary Checklist**

Yes	Likely	Prerequisite or Credit	Key Applicable Requirements and Assumptions
*		Smart Location	Project site is served by existing water/wastewater infrastructure.
	*	Imperiled Species and Ecological Communities	No listed endangered species on the project site.
*		Wetland and Water Body Conservation	No wetlands or water bodies on site
*		Agricultural Land Conservation	Project site is an infill site with no agricultural use or zoning designation
*		Floodplain avoidance	Project site is outside flood hazard area based on San Francisco's Preliminary Floodplain Maps.
5		Preferred Locations	Project site is an infill site that is also a previously developed site → 5 points. There are only 179 intersections in closest 1 square mile → 0 additional points.
7		Access to quality transit	Minimum daily transit service with multiple transit types: Project site has 470 weekday trips total. 293 weekend trips from bus lines 1, 2, 3, 43. All trips are available to 100% of dwelling units.
2	1	Housing and Jobs Proximity	Proposal is at least 30% Residential AND is within a 1/2-mile walking distance of enough existing full-time equivalent jobs to serve residents → 2 points AND Provide affordable housing meeting various criteria for a minimum of 15 years → 1 point
1		Site Design for Habitat or Wetland and Water Body Conservation	No significant habitat and no wetland/water bodies on proposed site.
<b>15</b>	<b>1</b>		

Source: ARUP, 2018

**NEIGHBORHOOD PATTERN AND DESIGN (NPD)**

The proposal's location within a dense, mixed-use neighborhood, as well as its strong internal connectivity, walkability, community connectivity, and integrated parking all contribute to its achievement of numerous Neighborhood Pattern and Design credits. The proposed parking integration strategies contribute to the achievement of the Compact Development, Walkable Streets, and Community Connectivity prerequisites and credits. The existing transit infrastructure and the transportation demand management strategies contribute to the achievement of the Transit Facilities, Transportation Demand Management, and Reduced Parking Footprint credits. The site location and internal connectivity contribute to its achievement of several prerequisites and credits, including the Walkable Streets, Access to Civic and Public Space, Connected and Open Community, Mixed-Use Neighborhoods, and Neighborhood Schools credits. The integrated design approach, which has been highly inclusive of the community, contributes directly to the achievement of the Community Outreach and Involvement credit, but the approach has also indirectly contributed to the majority of credits achieved in this category.

**Neighborhood Planning & Design – LEED ND v4 Preliminary Checklist**

Yes	Likely	Prerequisite or Credit	Key Applicable Requirements and Assumptions
*		Walkable Streets	90% of proposed buildings have a functional entry onto the circulation network/public space. At least 15% of the block length of the existing/planned circulation networks within and bordering the project have a minimum building-height-to-street-centerline ratio of 1:1.5 for every 1.5 feet of width from street centerline to building façade. The proposal provides continuous sidewalks or equivalent all-weather routes for walking along both sides of 90% of the circulation network block length within the project. No more than 20% of the block length of the circulation network within the proposal is faced directly by garage and service bay openings.
*		Compact Development	The proposal includes 54.7 dwelling units per acre of buildable land are available for residential uses, well over the 12 required and a floor-area ratio of 1.8 for non-residential components.
*		Connected and Open Community	Proposal includes over 140 intersections per square mile and 13 internal intersections. No more than 10% of the project area may be accessed via gated circulation network. The proposal includes more than one through-connection that terminates at the project boundary and intersects the circulation network. These connections are approximately 400' between entries
5	2	Walkable Streets	Proposal includes a high total linear distance of building façades that face the circulation network, with high ground-level window and door percentages, parking, and safe pedestrian and bicycle travel lanes.
4		Compact Development	The residential density per acre of the proposed project is 54.7, which is between the 38 and 63 thresholds.
4		Mixed-Use Neighborhoods	100% of proposed units are within a ¼-mile walk of >23 uses.
4	2	Housing Types and Affordability	Proposal includes many different housing types of diverse sizes and 12% of housing priced up to 120% of area median income.
	1	Reduced Parking Footprint	Proposed project includes no new off-street surface parking lots and provides preferred parking for carpool or shared-use vehicle parking space that is equivalent to at least 10% of the total off-street parking space for each nonresidential and mixed-use building on the site.
2		Connected and Open Community	Proposed site has 805 intersections within 1 square mile → 2 points
	1	Transit Facilities	Proposed site includes existing transit agency-approved shelters that meet minimum LEED criteria at existing stops.
	1	Transportation Demand Management	Proposed project will include unbundled parking and will likely include vehicle sharing → 1 Point
1		Access to Civic & Public Space	90% of planned dwelling units and nonresidential entrances within a ¼-mile walk of at least one civic and passive use space.
1		Access to Recreation Facilities	90% of planned dwelling units in the proposed project are located within a ½-mile walking distance of a publicly accessible indoor recreational facility of at least 25,000 square feet.
	1	Visitability and Universal Design	Proposal will likely include a minimum of 20% of units with one of: 1) Universal Design Throughout the Home; 2) Universal Design Kitchen Features; 3) Universal Design Bedroom and Bathroom Features.
2		Community Outreach and Involvement	Community has been included in pre-design, preliminary design, and ongoing communication Proposal has obtained endorsement from local NGOs, including the Housing Action Coalition and the San Francisco Bay Area Planning and Urban Research Association (SPUR)
1	2	Local Food Production	Proposal includes ample landscaped space, some of which has been allocated for food production → 1 Point Tenants in proposal may enroll in CSA programs → 1 Point Proposal is less than ½ mile to Kaiser Farmer's Market → 1 Point

2		Tree-Lined and Shaded Streetscapes	Proposal provides trees at intervals of no more than 50 feet along at least 60% of the total existing and planned block length within the project → 1Point Proposal provides shade from trees or permanent structures over at least 40% of the total length of existing and planned sidewalks within or bordering the project → 1Point
1		Neighborhood Schools	Proposed project at least 30% residential, AND at least 50% of the proposed units are within a 1/2-mile walk of the entry of an existing or new elementary or middle school or within a 1-mile walk of the entry of an existing or new high school.
27	10		

Source: ARUP, 2018

## GREEN INFRASTRUCTURE AND BUILDINGS (GIB)

Water credits are achieved through the integration of ultra-low flow fixtures in residential restrooms and non-potable water reuse strategies, which reduce indoor water use by at least 40 percent from baseline. Outdoor water use reductions are achieved through the use of native/adapted plant species and minimal turf grass. Energy performance credits are achieved through optimized orientation and massing strategies, high-performance mechanical equipment, and on-site renewable energy production, which collectively reduce building energy by an estimated average of 20% from baseline. Materials credits are achieved through the partial reuse of the existing building on site and a detailed and progressive solid waste management strategy.

### Green Infrastructure and Buildings – LEED ND v4 Preliminary Checklist

Yes	Likely	Prerequisite or Credit	Key Applicable Requirements and Assumptions
*		Certified Green Building	The proposal includes one building to be certified under LEED-BD+C.
*		Minimum Building Energy Performance	Each building in the proposal performs well above the required 5% modeled energy savings compared to baseline (ASHRAE 90.1 2010).
*		Indoor Water Use Reduction	The proposal reduces indoor water usage by an estimated average of 20% from baseline.
*		Construction Activity Pollution Prevention	The proposal includes an erosion and sedimentation control plan.
	1	Certified Green Buildings	The proposal anticipates that one building will be certified, which account for more than 10% and less than 20% of the total floor area.
	2	Optimize Building Energy Performance	Whole building energy simulation of the proposal shows an average estimated improvement of 20% over baseline.
	1	Indoor Water Use Reduction	The proposal integrates water reuse for flushing, which reduces indoor water usage by an average of 40% from baseline.
1	1	Outdoor Water Use Reduction	The proposal integrates the extensive use of native/adapted plants to achieve an estimated 50% reduction in outdoor water use versus baseline.
1		Building Reuse (50% of 1)	The proposal retains 59% of the floor plate of the main existing building.
1		Heat Island Reduction	The proposal includes both cool and vegetated roofs to reduce heat island effect.
1		Solar Orientation	The project site has favorable solar orientation, with a longer east-west than north-south axis.

	3	Renewable Energy Production	The proposed photovoltaic panels will reduce annual electrical and thermal energy production costs by approximately 20%.
1		Solid Waste Management	The proposal integrates several progressive solid waste management strategies that far exceed the requirements for this credit.
	1	Light Pollution Reduction	Various requirements including full cutoff fixtures in circulation areas
5	9		

Source: ARUP 2018

**3. Information to show the project or variant will achieve at least 15 percent greater transportation efficiency, as defined in Public Resources Code section 21180(c), than comparable projects. The Applicant shall provide information setting forth its basis for determining and evaluating comparable projects and their transportation efficiency, and how the proposed project will achieve at least 15 percent greater transportation efficiency. For residential projects, the Applicant shall also submit information demonstrating that the number of vehicle trips by residents divided by the number of residents is 15 percent more efficient than for comparable projects. For the purpose of this provision, comparable means a project of the same size, capacity, and location type.**

The *AB 900 Transportation Assessment* for the 333 California Street Project, dated July 2018, provides detailed trip generation calculations and other information about the proposed project and project variant as well as a comparison with vehicle trips generated by a comparable project. The *AB900 Transportation Assessment* is attached to this Application as **Attachment C, Transportation Efficiency**, and is summarized here.

The proposed project or project variant would replace the existing office building, the existing 212- space partially below-grade garage and 331 surface parking spaces, and the annex building at the corner of California Street and Laurel Street with a primarily residential mixed-use development on the project site. The proposed project and variant each include a mix of neighborhood-serving commercial uses (day care and retail) that would provide convenient local destinations for the development project’s residents without having to drive to other locations. The proposed project also includes office space that could serve project residents as well as other residents in the neighborhood. Office space is not included in the project variant.

The project site is located close to pedestrian networks and bicycle facilities, major transit services, and a diversity of land uses. The project site is in a highly-walkable area of San Francisco with an established pedestrian network. All nearby streets have sidewalks, and crosswalks are well marked. The proposed project and project variant both would improve pedestrian facilities by widening the existing 10-foot-wide sidewalks on Presidio Avenue and Masonic Avenue (adjacent to the project site) to meet the 15-foot recommended width identified in the San Francisco Better Streets Plan.<sup>2</sup> The existing sidewalks on Euclid Avenue (10.5 feet wide) and Laurel Street (10 feet wide) would be widened to meet the 12-foot minimum width identified in the Better Streets Plan. The proposed project and project variant both include other streetscape changes as part of a series of proposed improvements resulting in changes to the intersections of Presidio Avenue/Masonic Avenue/Pine Street, Masonic Avenue/Euclid Avenue, and Mayfair Drive/Laurel Street to enhance pedestrian safety. There are striped bicycle lanes in nearby streets on Arguello Boulevard from Washington Street in the Presidio to John F. Kennedy Drive in Golden Gate Park; on Euclid Avenue from Arguello Boulevard to Masonic Avenue and connecting to the signed route on Presidio Avenue that runs north-south between Lincoln Boulevard in the Presidio and Page Street via

<sup>2</sup> San Francisco Planning Department, San Francisco Better Streets Plan, January 2011, [http://www.sf-planning.org/ftp/BetterStreets/proposals.htm#Final\\_Plan](http://www.sf-planning.org/ftp/BetterStreets/proposals.htm#Final_Plan), accessed July 27, 2018.

Masonic Avenue; and on Post Street from Presidio Avenue to Steiner Street and continuing as a signed route to Market Street in downtown San Francisco.

The proposed project and variant are close to major transit services. The San Francisco Municipal Railway (Muni) operates ten bus routes with stops located within one half mile of the project site (1 California, 1BX California 'B' Express, 2 Clement, 3 Jackson, 31BX Balboa 'B' Express, 33 Ashbury-18th, 38 Geary, 38BX Geary 'B' Express, 38R Geary Rapid, and 43 Masonic). Bus stops are located adjacent to the project site and across the street at nearby corners on California Street, and on Walnut Street north of California Street. All are less than one block from the project site.

The project site is also served indirectly by a network of regional transportation facilities that provide access to the greater Bay Area. Regional transit provides service to the East Bay via Bay Area Regional Transit (BART) commuter rail service, Alameda-Contra Costa Transit buses, and Water Emergency Transportation Authority ferries; service to the North Bay via Golden Gate Transit buses and ferries; and service to the Peninsula/South Bay via Caltrain commuter rail, BART, and San Mateo County Transit buses. Regional transit services are generally not within walking distance of the project site, but can be reached by bicycle or from various Muni lines. The project site is also served by Chariot, a private commuter shuttle.

## PROJECT AND VARIANT TRIP GENERATION

The proposed development project, with 558 residential units, 49,999 gross square feet of office space, 54,117 gross square feet of retail space, a child care center, and 895 off-street vehicle parking spaces,<sup>3</sup> would generate 16,462 daily person trips by residents, employees, and visitors to the project site. The calculations of person trips accounts for existing activity on the site by current occupants, and also accounts for internal trip capture. Internalization is dependent on the quantity and mix of uses as well as the varying levels of activity they generate at various times of day. As a result, the internalization percentage is different for each scenario and time period. These internal trips begin and end on the project site and would not be made by automobile but by walking and bicycling. Approximately 17.6 percent of the trips generated by the proposed project would be internal to the project site in the a.m. peak hour, and 18.9 percent would be internal in the p.m. peak hour. The proposed project would generate approximately 5,760 daily vehicle trips external to the project site, with 691 weekday a.m. peak hour vehicle trips, and 752 weekday p.m. peak hour vehicle trips.

The project variant would have the same land uses as the proposed project, with the exception that the 49,999 square feet of office space would not be included and in its place an additional 186 residential units would be constructed, for a total of 744 dwelling units on the site. In addition, the retail and child care spaces would be slightly reduced. With the additional residential units but reduced commercial space, there would be 971 off-street vehicle parking spaces. The project variant would generate approximately 16,171 daily person trips by residents, employees, and visitors. Approximately 19 percent of the trips would be internal to the project site in the a.m. peak hour and approximately 19.2 percent would be internal to the site in the p.m. peak hour. The project variant would result in approximately 5,744 daily vehicle trips external to the project site, with 726 a.m. weekday peak hour vehicle trips, and 804 weekday p.m. peak hour vehicle trips.

Both the proposed project and project variant include bicycle parking in the amounts required in the San Francisco Planning Code. The proposed project includes 592 class 1 secure bicycle parking spaces for residents and employees and 101 class 2 bicycle parking spaces in bike racks for public use. The project

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<sup>3</sup> Note that for both the proposed project and the project variant, 60 of these parking spaces would replace 60 existing parking spaces on the site that are available for public parking on a paid hourly basis.

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variant includes 768 class 1 secure bicycle parking spaces and 122 class 2 bicycle parking spaces in bike racks.

## COMPARABLE PROJECT TRIP GENERATION

To analyze the transportation efficiency of the proposed and variant projects, the projects' vehicle trip generation was examined against that of comparable developments. The comparable project is assumed to be a project with similar land uses as the proposed project but with vehicle trip generation that is more typical of national averages. In addition to the same numbers of residential units and a childcare center, the comparable project includes a low-rise shopping center, a donut shop, and a quality restaurant to make its land uses similar to the retail uses in the proposed project and project variant, and includes general office space in the same amount as in the proposed project. The comparable development's vehicle trip generation was calculated using the standard national reference, the Institute of Transportation Engineers' (ITE) *Trip Generation Manual*.<sup>4</sup> The comparable project has the same land uses and quantities (size/number of units) as the proposed project and project variant, but may not have the same characteristics as the proposed project and project variant that would lead to trip reductions, such as an urban location near transit on an infill site.

The comparable project that corresponds to the proposed project would generate 13,532 total daily vehicle trips, including 1,374 total vehicle trips in the weekday AM peak hour and 975 total vehicle trips in the weekday PM peak hour. The comparable project that corresponds to the project variant would generate 13,847 total daily vehicle trips, including 1,350 total weekday a.m. peak hour vehicle trips and 962 total weekday p.m. peak hour vehicle trips.

## VEHICLE MILES TRAVELED

In addition to vehicle trip generation, there are other factors related to vehicular travel. These factors include housing density, diversity of land uses, design of the transportation network, and distance to high-quality transit, among others. Typically, low-density development at greater distances from other land uses and located in areas with poor access to transit generates more automobile travel and higher vehicle miles traveled (VMT) than development in urban areas with higher densities, a greater mix of land uses, and more travel options than private automobiles. San Francisco has a lower average VMT traveled ratio than the San Francisco Bay Area region, because it has higher residential densities, is well-served by transit and other travel modes such as the bicycle network, and has multiple neighborhood-serving commercial areas.

The project site is located in transportation analysis zone (TAZ) 709, which is close to transit services and bicycle and pedestrian networks, and has a diversity of land uses. Therefore, a project located in TAZ 709 has substantially reduced vehicle trips and shorter vehicle distances, and thus reduced VMT per capita and per employee, compared to other areas of the region. The average daily VMT per capita for residential uses in TAZ 709 is 7.3 miles, which is approximately 58% below the regional average daily VMT per capita of 17.2 miles. Additionally, the average daily VMT per employee for office uses in TAZ 709 is 10.1 miles, which is approximately 47% below the regional average daily VMT per employee of 19.1 miles. The average daily VMT per employee for retail uses in TAZ 709 is 8.3 miles, which is approximately 44% below the regional average daily VMT per employee of 14.9 miles.

## TRANSPORTATION DEMAND MANAGEMENT (TDM) PROGRAM

The project sponsor will be required to implement a Transportation Demand Management (TDM) Program to encourage the use of non-auto modes and reduce vehicle trips, pursuant to San Francisco

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<sup>4</sup> *Trip Generation Manual 10th Edition*. Institute of Transportation Engineers, 2017.

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Planning Code section 169. The measures in the project's TDM Program would reduce vehicle trips generated by the proposed project or project variant; however, they have not been taken into account in calculating trip generation for the proposed project or project variant and therefore are not reflected in the comparison with the comparable project.

The project sponsor currently proposes the following TDM measures. These measures are subject to revision during the planning review process for project entitlements.

- **Improve Walking Conditions (TDM Measure Active-1A):** Streetscape improvements proposed along California Street, Presidio Avenue, Masonic Avenue, Euclid Avenue and Laurel Street will be consistent with the Better Streets Plan. The proposed Mayfair and Walnut walks are intended to integrate the 10-acre site with the existing pedestrian network.
  - **Bicycle Parking (TDM Measure Active-2):** Bicycle parking would be provided for residential, office, and retail uses. For residential uses the project will provide the required class 1 secure space for each dwelling unit and two class 2 spaces for every 20 units. The number of spaces provided for office, childcare, and retail uses will comply with the San Francisco Planning Code.
  - **Showers and Lockers (TDM Measure Active-3):** At least one shower and at least six clothes lockers will be provided for every 30 class 1 bicycle parking spaces. The number of showers and clothes lockers will meet San Francisco Planning Code requirements.
  - **Bicycle Repair Station (TDM Measure Active-5):** A bicycle repair station, with tools and supplies such as a bicycle pump and wrenches, is proposed on the project site.
  - **Car Share Parking (TDM Measure Cshare-1):** Ten car share spaces will be provided in Basement Level B3 of the California Street Garage in accordance with the San Francisco Planning Code.
  - **Delivery Supportive Amenities (TDM Measure Delivery-1):** An area for the receipt and temporary storage of package deliveries will be provided in the off-street loading areas or other location on the project site.
  - **Onsite Childcare (TDM Measure Family-2):** An onsite childcare facility in the Walnut Building is part of the proposed project or project variant.
  - **Multimodal Wayfinding Signage (TDM Measure Info-1):** Multimodal wayfinding signage that directs tenants, residents, visitors, and employees to nearby transportation services will be provided. Signage will comply with San Francisco standards.
  - **Real Time Information Displays (TDM Measure Info-2):** Real time information displays (showing information about transit lines, walk time to transit locations, or the location of onsite car share vehicles, for example) will be provided in prominent locations on the project site.
  - **Tailored Transportation Marketing (TDM Measure Info-3):** Individualized, tailored marketing and communication campaigns regarding sustainable transportation modes will be implemented. A TDM coordinator will manage these marketing services, to include promotions and welcome packets with information about transportation options. Personal consultations will be offered to new residents and retail employees along with a request for a commitment to try sustainable transportation options.
  - **Unbundle Parking (TDM Measure Pkg-1):** All accessory parking for the proposed project will be leased or sold separately from the rental or purchase fees.
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Based on the analysis included in the TDM Technical Justification Memo,<sup>5</sup> prepared by various San Francisco city agencies in support of the TDM ordinance, measures from the TDM Program such as improving walking conditions could reduce VMT by up to two percent, and unbundled parking could reduce VMT by up to 4.5 percent. As such, implementation of the proposed TDM package would result in a further reduction in vehicle trips to and from the site.

### TRIP GENERATION AND VMT COMPARISON SUMMARY

To compare the overall trip generation of the proposed project and project variant to the comparable project, the trip generation estimates for the proposed project and project variant were adjusted to account for existing uses and internal trips. The resulting vehicle-trip generation estimates were then compared to the trip generation estimates for the comparable project.

As shown in the following tables both the proposed project and the project variant would result in a decrease in vehicle trip generation compared to the respective comparable project. Table 1, Trip Generation Comparison for Proposed Project, shows that the proposed project would generate 7,772 fewer daily vehicle trips than the respective comparable project. This equates to a 57 percent decrease in daily vehicle trips, a 50 percent decrease in weekday a.m. peak hour vehicle trips, and a 23 percent decrease in weekday p.m. peak hour vehicle trips.

**Table 1: Trip Generation Comparison for Proposed Project**

Project	Land Use	Size	Total Daily Trips	Weekday AM Peak Hour Total (In and Out)	Weekday PM Peak Hour Total (In and Out)
Comparable Development	Residential	558 units	13,532	1,374	975
	Retail/ Childcare	68,807 gsf			
	Office	49,999 gsf			
Proposed Project	Residential	558 units	5760	689	751
	Retail/Childcare	68,807 gsf			
	Office	49,999 gsf			
	<b>Vehicle Trip Decrease</b>	--	<b>7,772</b>	<b>685</b>	<b>224</b>
	<b>Percent Decrease</b>		<b>57%</b>	<b>50%</b>	<b>23%</b>

Source: ITE Trip Generation Manual, 10th Edition; Kittelson & Associates, Inc., 2018

As shown in Table 2: Trip Generation Comparison for Project Variant, it is estimated that there would be 8,103 fewer daily vehicle trips generated compared to the comparable project, which corresponds to a 59 percent decrease in daily vehicle trips, a 46 percent decrease in weekday AM peak hour vehicle trips, and a 16 percent decrease in weekday PM peak hour vehicle trips.

In comparison to the regional average daily VMT per capita/employee, as discussed above, the average daily VMT per capita within TAZ 709 for residential, office, and retail uses is 58 percent, 47 percent, and 44 percent lower, respectively, when compared to the regional averages. This shows that, for both the proposed project and the project variant, there is expected to be lower than average daily VMT when compared to the regional average daily VMT, substantially more than a 15 percent reduction.

<sup>5</sup> City and County of San Francisco, *Transportation Demand Management Technical Justification*, Appendix B, January 2018. Available online at [http://default.sfplanning.org/plans-and-programs/emerging\\_issues/tsp/TDM\\_Technical\\_Justification\\_update2018.pdf](http://default.sfplanning.org/plans-and-programs/emerging_issues/tsp/TDM_Technical_Justification_update2018.pdf), accessed July 27, 2018

**Table 2: Trip Generation Comparison for Project Variant**

Project	Land Use	Size	Total Daily Trips	Weekday AM Peak Hour Total (In and Out)	Weekday PM Peak Hour Total (In and Out)
Comparable Development	Residential	744 units	13,847	1,350	962
	Retail/ Childcare	63,243 gsf			
Project Variant	Residential	744 units	5,744	726	804
	Retail/ Childcare	63,243 gsf			
	<b>Vehicle Trip Decrease</b>	--	<b>8,103</b>	<b>624</b>	<b>158</b>
	<b>Percent Decrease</b>		<b>59%</b>	<b>46%</b>	<b>16%</b>

Source: ITE Trip Generation Manual, 10th Edition; Kittelson & Associates, Inc., 2018

## CONCLUSION

The combined effects of the project’s urban infill location along a major transit corridor that is close to transit, bicycle, and pedestrian amenities would reduce the anticipated daily vehicular trip generation estimates by approximately 57 percent (project) or 59 percent (variant) as compared to a comparable mixed-use project. Therefore, the proposed project or project variant would exceed the 15 percent greater transportation efficiency threshold for an Environmental Leadership Development Project. Implementation of the TDM Program will enhance the transportation efficiency even more.

### **4. Information to show that the project is located on an infill site as defined at Public Resources Code Section 21061.3, and in an urbanized area, as defined at Public Resources Code Section 21071.**

The project site is located in San Francisco on an infill site surrounded by existing residential, commercial, and institutional development. An infill site is defined in Public Resources Code section 21061.3 as a site that “has been previously developed for qualified urban uses.” A “qualified urban use” is defined in Public Resources Code section 21072 as “any residential, commercial, public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses.” The project site meets this definition as it is currently a commercial office use and a public institutional use occupied by the University of California, San Francisco, with associated parking and landscaping.

The project site is located in an urbanized area as defined in Public Resources Code section 21071, as it is in “an incorporated city” that has a population of at least 100,000 persons. The City and County of San Francisco is an incorporated city that has an estimated population of 884,363 according to the 2017 estimates prepared by the United States Census Bureau.

Thus, the proposed project and variant would be an urban infill development because it is located on an infill site previously developed with a qualified urban use in an urbanized area.

**5. Information required by Public Resources Code section 21180(b)(1) is available for projects within a metropolitan planning organization for which a sustainable communities strategy or alternate planning strategy is in effect. For the purposes of this provision, “in effect” means that the sustainable communities strategy or the alternative planning strategy has been adopted by the metropolitan planning organization, and that the Air Resources Board has accepted the metropolitan planning organization’s determination that the sustainable communities strategy or alternative planning strategy meets the adopted greenhouse gas reduction targets and is not the subject of judicial challenge.**

Senate Bill (SB) 375 was adopted by the legislature in August 2008 and signed into law by the Governor in September 2008. This legislation links regional planning for housing and transportation with the greenhouse gas (GHG) reduction goals in Assembly Bill 32. Each Metropolitan Planning Organization is required to adopt a Sustainable Communities Strategy to encourage compact land development to reduce passenger vehicle miles traveled and vehicle trips so that the region will meet targets established by the California Air Resources Board (CARB) for reducing GHG emissions. In September 2010, the CARB adopted regional GHG targets for passenger vehicles and light trucks for the years 2020 and 2035 for the various Municipal Planning Organizations in California. Two climate protection targets were established for the San Francisco Bay Area by the CARB: a per capita reduction of GHG emissions by 7 percent by year 2020 and 15 percent by year 2035.<sup>6</sup>

The project is within the jurisdiction of the Association of Bay Area Governments (ABAG). ABAG and the Metropolitan Transportation Commission (MTC) published the draft Plan Bay Area, the region’s proposed Regional Transportation Plan/Sustainable Communities Strategy, in 2010. ABAG and MTC adopted the final Sustainable Communities Strategy in 2013 and submitted the final Plan Bay Area, containing the final Sustainable Communities Strategy, to the CARB in early 2014. The supporting documentation for the Sustainable Communities Strategy shows that the Plan would accomplish a 10 percent per capita carbon dioxide emissions reduction from passenger vehicles by 2020 and a 16 percent per capita reduction by 2035. CARB Executive Order G-14-028, approved in April 2014, indicated that the CARB accepted ABAG’s quantification of GHG emissions from the Sustainable Communities Strategy and determined that if implemented, Plan Bay Area would achieve the established reduction targets in compliance with SB 375. Plan Bay Area was challenged in court in 2014 in multiple actions; each of the challenges has either been settled or the Plan was upheld in the courts.

More recently, MTC and ABAG prepared and adopted Plan Bay Area 2040 in July 2017, containing updates to the original Plan Bay Area based on new forecasts of regional population and employment growth and distribution using upgraded models, and on adjusted approaches to some GHG reduction strategies based on surveys of their effectiveness. The basic land use and transportation strategies from the 2013 Sustainable Communities Strategy remain, promoting infill development with higher densities and more multi-family housing in mixed-use communities focused on neighborhoods with transit. Transportation strategies focus on enhancing transit and improving roadways, with more high-occupancy vehicle lanes and toll lanes.

Plan Bay Area 2040 would exceed the GHG emissions target established by the CARB in 2010, achieving a 16 percent reduction by the year 2035 and an 18 percent reduction in emissions between 2005 and 2040,

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<sup>6</sup> In March 2018 CARB adopted updated targets for ABAG/MTC that will be applicable beginning in October 2018. These new targets are a per capita reduction in GHG emissions of 10 percent by year 2020 and 19 percent by 2025. SB 375 Regional Greenhouse Gas Emissions Reduction Targets, CARB Resolution 18-12, adopted March 22, 2018. Resolution is available at <https://www.arb.ca.gov/cc/sb375/finalres18-12.pdf>. Updated targets are available at <https://www.arb.ca.gov/cc/sb375/finaltargets2018.pdf>.

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according to the *Performance Assessment Report* for Plan Bay Area 2040, published by ABAG and MTC in July 2017 [p. 11]. The CARB staff reviewed Plan Bay Area 2040 and approved a technical evaluation of the GHG reduction quantifications in June 2018.<sup>7</sup>

Plan Bay Area focuses on where the region is expected to grow and what transportation investments will support that growth. It encourages infill development and multifamily development particularly close to public transit and in walkable neighborhoods. The proposed project or variant, once approved, will be consistent with the “general use designation, density, building intensity, and applicable policies specified for the project area in ...a sustainable communities strategy” as required in Public Resources Code section 21180(b)(1). The development program provides for reasonable-density infill development in a transit priority area as defined in Public Resources Code Section 21099(a)(7). Although the project site is not in a Priority Development Area designated in Plan Bay Area 2040, it fulfills many of the strategies contained in the plan, as the site is located in a mixed-use neighborhood with retail, restaurant, childcare and other community services that will encourage residents to walk or bicycle to nearby services. The project or project variant will include retail space and a childcare center on the site that will further reduce automobile travel generated.

**6. If the project is a multi-family residential project, evidence that (1) private vehicle parking spaces are priced and rented or purchased separately from dwelling units; or (2) the dwelling units are subject to affordability restrictions that prescribe rent or sale prices, and the cost of parking spaces cannot be unbundled from the cost of dwelling units.**

The project or variant proposes to provide unbundled parking for all residential units except for any dwelling units subject to affordability restrictions that prescribe rent or sale prices and for which the cost of parking spaces cannot be unbundled from the cost of the affordable dwelling units.

**7. Information establishing that the project entails a minimum investment of \$100 million in California through the time of completion of construction.**

The proposed project includes 558 residential units in addition to office, retail and childcare space and subsurface parking. The project variant includes 744 residential units in addition to retail and childcare space and subsurface parking. The project or variant will have expended over \$175 million in construction costs by the time construction is completed, according to the estimate presented in the Applicant’s Environmental Evaluation Application to the San Francisco Planning Department in March 2016. In addition, with a range of approximately 75 to 175 construction workers on the site on a typical day during construction, based on current prevailing wages, construction labor costs alone could be approximately \$150 to \$175 million. Thus, the project or variant will exceed the minimum investment of \$100 million by the time of completion of construction.

**8. Information establishing that the prevailing and living wage requirements of Public Resources Code section 21183(b) will be satisfied.**

Public Resources Code section 21183(b) requires that a project to be certified by the Governor must create “high-wage, highly skilled jobs that pay prevailing wages for construction jobs and living wages and provide construction jobs and permanent jobs for Californians, and help reduce unemployment.” Up to 75 to 175 construction workers would be on the project site on a typical day during the approximately 7-year construction period estimated for the proposed project or variant.

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<sup>7</sup> California Air Resources Board staff, *Technical Evaluation of the Greenhouse Gas Reduction Quantification for the Association of Bay Area Government’s and Metropolitan Transportation Commission’s SB375 2017 Sustainable Communities Strategy*, June 2018. Available at <http://www.arb.ca.gov/cc/sb375/sb375.htm> Accessed on August 3, 2018.

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Public Resources Code section 21183(b) defines “jobs that pay prevailing wages” as “all construction workers employed in the execution of the project will receive at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code.” The Applicant will include the prevailing wage requirement in all construction contracts.

The proposed project or variant will create high-wage, highly skilled jobs, both during construction and during operation. Approximately 395 permanent jobs would be created with the proposed project, and approximately 206 permanent jobs would be created by the project variant. In addition to the prevailing wage requirements for construction workers, the Applicant will be required to comply with local ordinances that require payment of living wages. Chapter 12R of the San Francisco Administrative Code requires payment of a minimum wage that is higher than that required by the State of California. As of July 1, 2018, the minimum wage in San Francisco is \$15.00 per hour, substantially higher than the California minimum wage of \$11.00 per hour in 2018. The San Francisco ordinance provides for annual increases in July of each year after 2018 based on the Consumer Price Index for urban wage earners for the San Francisco-Oakland-San Jose, California metropolitan statistical area. The requirements of Chapter 12R are not applicable to employees who are covered by a collective bargaining agreement if the agreement expressly waives the ordinance’s requirements. A copy of Chapter 12R is presented in **Attachment D** to this Application, along with a copy of the California Department of Industrial Relations’ letter approving the San Francisco Office of Labor Standards Enforcement’s Labor Compliance Program.

**9. Information establishing that the project will not result in any net additional greenhouse gas emissions. This information is subject to a determination signed by the Executive Officer of the Air Resources Board that the project does not result in any net additional greenhouse gas emissions, following the procedures set forth in section 6 of the Governor’s Guidelines.**

The California Air Resources Board (CARB) must review the analysis of greenhouse gas emissions (GHG) from construction and operation of the proposed project or project variant. The analysis should include the technical basis for characterizing and analyzing GHG emissions and for identifying and quantifying the GHG reduction potential of proposed strategies to fully offset any GHG emissions generated by a proposed project. A Memorandum prepared by Ramboll presents the technical methodology for and results of quantifying the GHG emissions from the existing activities on the project site and the GHG emissions from construction and operation of the proposed project or project variant. The Memorandum and its Appendix materials are in **Attachment E**.

The baseline for the analysis of the proposed project and project variant is the emissions from existing activities on the project site. Project-generated emissions were calculated yearly during construction phases, with operation of earlier phases overlapping with later construction phases. Construction was assumed to occur over a 7-year period; however, the applicant may choose to develop the project site over a timeframe of up to 15 years. The calculations assume a seven-year timeframe to present the most conservative approach to the analysis with the most concentrated emissions. Operational emissions were calculated for 2020 through 2057 to account for an approximately 30-year lifespan of the project following buildout.

Total construction emissions of GHG would be 4,273 metric tons (MT) of CO<sub>2</sub>e for both the proposed project and project variant. Total operational emissions would be 3,703 MT for the proposed project and 6,235 MT for the project variant. Total gross operational emissions for the lifetime of the proposed project or project variant do not include any credits from years where existing emissions were calculated to be higher than those from the proposed project or the project variant. By 2038 for the proposed project

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and by 2044 for the project variant, with anticipated reductions from the California Renewables Portfolio Standard and fleet turnover, operational emissions of the proposed project or project variant would be below existing emissions.

To offset GHG emissions from construction in 2020 through 2027 and from operation in 2026 through 2037 for the proposed project or through 2044 for the project variant, the project sponsor commits to measures to ensure there would be no net additional GHG emissions from the project or project variant. This would be achieved through on-site measures such as installing additional solar panels, additional on-site electric vehicle charging stations, or through the purchase of qualified GHG credits, or a combination of on-site measures and credits.

**10. Information establishing that the project will comply with the requirements for commercial and organic waste recycling in Chapters 12.8 (commencing with Public Resources Code section 42649) and 12.9 (commencing with Public Resources Code Section 42649.8), as applicable.**

California has had statutory and regulatory requirements related to solid waste recycling for well over 10 years requiring local governments to reduce solid waste in landfills with waste diversion programs. The two more recent statutes, in Chapters 12.8 and 12.9 of Division 30 of the Public Resources Code related to waste management, require recycling of solid waste and organic waste. Chapter 12.8 requires that businesses and multi-family residential buildings with five units or more that generate more than four cubic yards of solid waste per week source separate its solid waste and subscribe to some kind of recycling service consistent with local ordinances or state regulations. Chapter 12.9 requires that businesses generating over specified amounts of organic solid waste per week arrange for recycling services for that organic solid waste, and also requires that if the state has not reached a reduction of 50 percent below the 2014 level of disposal of organic waste by 2020, businesses that generate more than two cubic yards of solid waste per week must source separate and arrange for recycling of organic solid waste. These statutes also require local jurisdictions to establish a commercial solid waste recycling program if it did not already have one as of July 2012, and an organic solid waste recycling program by January 2016 if it did not already have one.

The proposed project or variant will be subject to these statutory requirements, and will comply by following all of the requirements of San Francisco's local recycling and composting ordinances.

San Francisco's Mandatory Recycling and Composting Ordinance (No. 100-09) in Chapter 19 of the San Francisco Environment Code is a local municipal ordinance requiring all persons located in San Francisco to separate their recyclables, compostable and landfilled trash and to participate in recycling and composting programs. The Applicant has included appropriate recycling and composting collection facilities in the design of each building and in the overall site design so that these materials can be easily disposed of by residents and employees and easily collected by the various solid waste collection and disposal companies that serve the project site.

Demolition and construction of the proposed project would generate an estimated 47,000 cubic yards of debris, and an estimated 241,300 net cubic yards of soil from excavation of the site. The San Francisco Construction and Demolition Debris Recovery Ordinance (No. 27-06), Chapter 14 in the San Francisco Environment Code, requires that substantial amounts of construction and demolition debris material removed from a project must be recycled or reused. All demolition and construction debris must be transported by a registered transporter and processed by a registered facility. The processing facility must divert a minimum of 65 percent of total waste received from landfills, including materials separated for reuse and recycling. No construction and demolition debris can be taken to landfill or put in the garbage, according to San Francisco Health Code Section 288. Copies of these local ordinances are provided in **Attachment F**.

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Thus, the Applicant will be required to comply not only with the Public Resources Code requirements for commercial and organic waste recycling, but also with the requirements of San Francisco's local ordinances requiring recycling and composting solid waste both during construction and during operation of the proposed project or variant.

**11. Information documenting a binding agreement between the project proponent and the lead agency establishing the requirements set forth in Public Resources Code section 21183(e) (all mitigation measures will be conditions of approval and enforceable, and environmental mitigation measures will be monitored and enforced for the life of the obligation), (f) applicant will pay costs for hearing by Court of Appeal, and (g) (applicant will pay costs of preparing the record of proceedings).**

Written acknowledgement from the project sponsor containing commitments regarding Public Resources Code sections 21183(e)(f) and (g) is included as **Attachment G**. The Applicant is committed to comply with all Mitigation Monitoring and Reporting Program measures from the EIR that are included as conditions of approval and that those conditions will be fully enforceable by the San Francisco Planning Department, Department of Building Inspection, Health Department, and/or the Department of the Environment. The Applicant agrees to pay the costs for hearing by the Court of Appeal, and will pay the costs of preparing the record of proceedings.

## REFERENCES

Association of Bay Area Governments/Metropolitan Transportation Commission, *Performance Assessment Report, Plan Bay Area 2040*, July 2017.

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City and County of San Francisco, *Transportation Demand Management Technical Justification*, Appendix B, January 2018.

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