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Environmental Impact Report Draft

UC Hastings College of the Law

Draft Environmental Impact Report

University of California Hastings College of the Law Long Range Campus Plan

SCH No. 2015122035

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1. INTRODUCTION

1.1 UC HASTINGS LONG RANGE CAMPUS PLAN

The University of California Hastings College of the Law (UC Hastings or the College) campus currently consists of five buildings located at 100, 198, and 200 McAllister Street, 50 Hyde Street, and 376 Larkin Street (the UC Hastings Parking Garage), and a undeveloped lot at 333 Golden Gate Avenue, all of which are on two contiguous blocks between Larkin and Leavenworth Streets, and Golden Gate Avenue and McAllister Street.

To complement the renaissance of the Mid-Market area and the changing face of the Tenderloin, UC Hastings focused its proposed Long Range Campus Plan (LRCP) on strategic enhancements of its infrastructure in support of an innovative approach to legal education reliant upon practical skill and experiential learning, ensuring that its graduates are well equipped to enter the modern legal marketplace.

The UC Hastings LRCP describes the College's efforts in recent years to achieve campus-wide code-compliance and fire/life-safety objectives, as well as other space improvements to improve campus life for students, faculty, and staff.

The LRCP proposes the following major projects, which are further detailed in Chapter 3, Project Description:

1. Construction of a new, approximately 57,000-gross-square-foot (gsf) academic building on the undeveloped lot at 333 Golden Gate Avenue
2. Demolition of Snodgrass Hall at 198 McAllister Street followed by construction of a new campus housing building in its place, with modernization of the adjoining structure at 50 Hyde Street (Variant A)
3. Demolition of both Snodgrass Hall at 198 McAllister Street and the Annex at 50 Hyde Street, and construction of a new campus housing building that incorporates the academic functionality of 50 Hyde Street into the lower levels of a campus housing complex on the combined 198 McAllister Street and 50 Hyde Street sites (Variant B)
4. Renovation and reconfiguration of the Tower and Great Hall at 100 McAllister Street as a mixed-use facility

1.2 ENVIRONMENTAL REVIEW PROCESS

Under the California Environmental Quality Act (CEQA), the agency that carries out a project is the Lead Agency (CEQA Guidelines, Section 15050(a)). UC Hastings is the Lead Agency for the LRCP and individually proposed development projects evaluated in this Environmental Impact

Report (EIR). UC Hastings is responsible for preparing this EIR and for approving and carrying out the LRCP and its proposed developments.

New campus housing at UC Hastings may be jointly developed with the University of California, San Francisco (UCSF), and UCSF will be a Responsible Agency under CEQA Sections 15096 and 15381.

CEQA requires agencies to prepare EIRs "as early as feasible in the planning process to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment" (CEQA Guidelines, Section 15004[b]).

This EIR has been prepared to inform UC Hastings decision-makers, responsible agencies, and the general public, of the development projects proposed under the LRCP and the potential physical environmental consequences of project implementation. This EIR also examines alternatives to the proposed projects and identifies mitigation measures to reduce or avoid potentially significant physical impacts.

CEQA requires that, before a decision can be made to approve a project that could result in adverse physical effects, an EIR must be prepared that fully describes the environmental effects of the project. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental impacts of a project, to recommend mitigation measures to lessen or eliminate significant adverse impacts, and to examine feasible alternatives to the project. The information contained in the EIR must be reviewed and considered by the UC Hastings Board of Directors and other approving bodies prior to a decision to approve, disapprove, or modify the project. CEQA requires that agencies shall neither approve nor implement a project unless the project's significant environmental effects have been reduced to a less-than-significant level, essentially "eliminating, avoiding, or substantially lessening" the potentially significant impacts, except when certain findings are made. If an agency approves a project that will result in the occurrence of significant adverse impacts that cannot be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing, demonstrate that its action is based on the EIR or other information in the record, and adopt a Statement of Overriding Considerations.

1.3 THE LRCP ENVIRONMENTAL IMPACT REPORT

UC Hastings published a Notice of Preparation and Initial Study on the LRCP on December 14, 2015, with a 45-day public comment period on the scope of the Draft EIR through January 29, 2016.

This Long Range Campus Plan Draft Environmental Impact Report was published on March 25, 2016. The Draft EIR public comment period will continue through May 9, 2016. The UC Hastings Board of Directors will hold a public hearing on the Draft EIR, on May 3, at 6:00 PM.

Comments on the Draft EIR may be sent to UC Hastings using the following contact information:

Mr. David Seward
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UC Hastings College of the Law
200 McAllister Street
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2. SUMMARY

2.1 PROPOSED LONG RANGE CAMPUS PLAN

The University of California Hastings College of the Law (UC Hastings or the College) proposes the enhancement of campus infrastructure through the preparation and execution of the UC Hasting's Long Range Campus Plan (LRCP). Development with the LRCP would provide improved facilities, maximize usage of campus space, and support an enhanced and innovative approach to legal education. The LRCP incorporates the findings and capital proposals of the UC Hastings Five Year Infrastructure Plan 2016–2021, which compiles the college's mandates and efforts to achieve campus-wide code-compliance and fire/life-safety objectives, as well as other space improvements.

The UC Hastings campus currently consists of five buildings located at 100, 198, and 200 McAllister Street, 50 Hyde Street, and 376 Larkin Street (UC Hastings Parking Garage), as well as an undeveloped lot at 333 Golden Gate Avenue, currently used as an outdoor recreation space and demonstration garden with aboveground planter boxes, which are on two contiguous blocks between Larkin and Leavenworth Streets, and Golden Gate Avenue and McAllister Street in San Francisco's Civic Center Neighborhood. The existing facilities include:

- 100 McAllister Street, also known as the Tower, is a 27-story, 249,000-gross-square-foot (gsf) structure constructed in 1929; it primarily serves as student housing, with 252 units and recreational facilities. Educational and research functions at 100 McAllister Street currently utilize approximately 20,000 gsf of the building.

- 198 McAllister Street, known as Snodgrass Hall, is a four-story, 76,000-gsf structure constructed in 1953; it serves as the primary academic facility of UC Hastings, housing the majority of the College's lecture halls and seminar rooms, along with 80 offices.

- 50 Hyde Street, known as the Snodgrass Hall Annex, is a four-story, 61,000-gsf structure constructed in 1969 and is immediately adjacent to Snodgrass Hall; it consists of four classrooms, the Marvin and Jane Baxter Appellate Law Center, Moot Court, the Gold Reading Room, and the Louis B. Mayer multi-purpose hall.

- 200 McAllister Street, known as Mary Kay Kane Hall, is a six-story, 177,000-gsf structure that was constructed in 1980; it houses many UC Hastings faculty and administrative offices, the library, cafeteria, faculty lounge, and various student support facilities.

- The UC Hastings Parking Garage, at 376 Larkin Street, is a seven-story, 157,000-gsf structure constructed in 2009; it provides 395 parking spaces and houses 13,000 sf of retail space.

- 333 Golden Gate Avenue (Block 0347/Lot 017) is an 11,962-sf asphalt lot currently in use as a garden for community-based environmental education and as a recreational area for UC Hastings students.

The LRCP would include strategic infrastructure improvement projects to satisfy UC Hastings objectives, and are discussed in greater detail in Chapter 3, Project Description. LRCP improvement projects would include:

1. Construction of a new academic building at 333 Golden Gate Avenue. This new 57,000-gsf academic building would be the first development under the LRCP, scheduled to proceed design/build from mid-2017 through 2019, and would replace current academic operations at 198 McAllister Street. The academic building would be approximately 90 feet in total height, with eight stories.
2. Redevelopment of the 198 McAllister Street site with campus housing, and modernization of the adjoining 50 Hyde Street structure (Variant A). Upon completion of the new academic building at 333 Golden Gate Avenue, the 198 McAllister Street building would be demolished to allow for construction of an approximately 13-story, 140-foot-tall 227,000-gsf campus housing building. The building would provide approximately 400 to 600 housing units, as well as approximately 15,000 sf of non-revenue-generating College-serving academic and instructional uses, and/or revenue-generating third-party retail uses on the ground floor. Under this variant the 50 Hyde Street building would be modernized to support college academic functions. Development would be expected to be completed sometime in 2022.
3. Redevelopment of the 198 McAllister Street and 50 Hyde Street sites with campus housing, including academic functionality of the lower levels of 50 Hyde Street (Variant B). Under this variant, both the 198 McAllister and 50 Hyde Street buildings would be demolished upon completion of the new academic building at 333 Golden Gate Avenue and would allow for the extension of the proposed approximately 13-story, 140-foot-tall structure at 198 McAllister Street to encompass site of 50 Hyde Street as well. Development would result in an approximately 329,000-gsf campus housing building, providing between 525–770 units. Approximately 61,000 sf would be dedicated to academic, administrative, assembly, faculty, and multipurpose/support space on the ground and second floors to replace the existing 50 Hyde Street facilities. Development would be expected to be completed sometime in 2022.
4. Renovation and reconfiguration of the Tower and Great Hall at 100 McAllister Street as a mixed-use facility. Constructed in 1929, 100 McAllister Street (the Tower) would benefit from seismic strengthening and general building interior upgrade and modernization. The building currently contains 252 units of housing accommodating approximately 280 residents. Upon completion of new campus housing at 198 McAllister Street (and potentially 50 Hyde Street), the tower would be renovated increasing the total number of units to approximately 260–350. Work would be projected to be completed sometime in 2024 or 2025.

New campus housing at UC Hastings may be jointly developed with the University of California, San Francisco (UCSF) to accommodate the academic and housing needs of UC Hastings and UCSF under their shared affiliation with the University of California System. Shared campus housing would be a natural extension of the existing collaboration between UC Hastings and UCSF on a successful consortium on law, science, and health policy for medical students and law students.

2.2 Environmental Issues

This EIR is a Program EIR, under CEQA Guidelines Section 15168(a), as the LRCP is a series of logical parts in a chain of contemplated actions. As LRCP projects are refined, UC Hastings will examine the projects in light of CEQA Guidelines Sections 15162 and 15168(c), and determine whether the project's effects would require further environmental review. If UC Hastings finds that no new or substantially more severe effects would occur and new mitigation measures are not required, UC Hastings could approve the project as being within the scope of the LRCP EIR. If the later project could have effects not identified in the LRCP EIR, UC Hastings could prepare a Supplement to the LRCP EIR, under Guidelines Section 15163, or an Addendum to the LRCP EIR, under Guidelines Section 15164.

An Initial Study was completed for the LRCP in December 2015, and analyzed environmental issues associated with potential LRCP developments. The Initial Study, included as Appendix A herein, determined that the LRCP would not cause significant environmental impacts in the several topic areas, including biological resources; population and housing; agriculture and forest resources; hazards and hazardous materials; mineral and energy resources; public services; utilities and service systems; hydrology and water quality; and recreation. Therefore, this EIR does not examine those environmental issues further.

In this EIR, environmental issues and potential impacts associated with LRCP developments are discussed in Chapter 4, Environmental Evaluation. The evaluation of environmental issues in this EIR determined certain topics would generate no potentially significant effects, or less-than-significant environmental impacts, without requiring mitigation measures to achieve those determinations. Those topics include aesthetics, geology and soils, greenhouse gas emissions, land use and planning, transportation, and shadow. This EIR identified mitigation measures that would eliminate or reduce impacts on air quality, cultural resources, operational noise, and wind effects to a less-than-significant level. The EIR found that construction noise and vibration effects would be reduced but not avoided with implementation of mitigation measures. Therefore, construction noise and vibration would be significant unavoidable environmental impacts.

Aesthetics

Public Resources Code Section 21099(d), contained in Senate Bill (SB) 743, effective January 1, 2014, provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." The LRCP would meet those criteria, and thus, would not have significant impacts. While the addition of the 333 Golden Gate Avenue building and other LRCP development would change the visual character of the campus, changes would not be substantial or significant. LRCP development would contribute new sources of light and glare to the area, but would not be uncharacteristic of the dense urban environment. The impact would be less than significant.

Geology and Soils

The UC Hastings campus and vicinity is in an area with varying subsurface conditions, and in a region prone to seismic events. A geotechnical investigation was completed for the 333 Golden Gate Avenue site which determined that while shallow soils underlying potential LRCP development sites consist mostly of fill material, deeper soils consist of stable compositions appropriate for foundations and have low liquefaction or expansion potential. Excavation would be anticipated to remove fill material, reaching stable soils. Rupture of known faults in the region would cause seismic related ground shaking, LRCP development would incorporate California Building Code requirements regarding seismic safety. The impact would be less than significant.

Greenhouse Gas Emissions

The LRCP would not contribute GHG emissions above regional significance thresholds established by the BAAQMD. LRCP development would generate incremental increases in GHG emissions with expansion of campus facilities; however, increases would be below significance thresholds, and impacts would be less than significant.

Land Use and Planning

LRCP development would be consistent with existing uses on the campus, and would not expand campus boundaries. No state-level plans have immediate influence over the LRCP area, and while the 140-foot building heights with LRCP developments would exceed San Francisco Planning Code 80-foot height limits, as a state entity UC Hastings is not subject to San Francisco requirements. However, this height increase would not be uncharacteristic of the surrounding area, and the impact would be less than significant.

Transportation

The UC Hastings campus is located in a transit priority area with all modes of private and public transportation available. Under SB 743, parking impacts of projects proposed in a transit priority area are not considered significant under CEQA, and thus, would have less-than-significant impacts. While the development of new campus buildings would fractionally increase the amount of overall transit trips to and from UC Hastings due to an increase in student housing, the transportation analysis completed for the LRCP determined that development would have less-than-significant impacts on vehicle traffic and intersection operations, transit capacity, pedestrian and bicycle facilities, loading conditions, and emergency access.

Shadow

LRCP development at 198 McAllister Street would add shade to Civic Center Plaza, a San Francisco Recreation and Park Department open space, during early morning periods at specific times of the year, no later than approximately 7:45 a.m. A limited amount of new shadow would be cast on the northeast corner of the plaza, and on sidewalks and adjacent automobile ramps to the below-grade parking garage. These are areas of low recreational use, and shadow would not affect the nearby children's playground. The LRCP would not create new shade that would substantially affect outdoor recreation uses at Civic Center Plaza, and the shadow impact would be less than significant.

LRCP development would not adversely affect recreation uses at United Nations Plaza, San Francisco Department of Public Works property south of the campus, or at Phillip Burton Plaza, at the Phillip Burton Federal Office Building, northwest of UC Hastings.

The proposed LRCP developments would have less-than-significant impacts on the remaining environmental issues analyzed in this EIR—including air quality, noise, cultural resources, and wind—after implementation of mitigation measures; these topics are discussed in the following section.

2.3 Significant Impacts and Mitigation Measures

The environmental analysis identified potentially significant impacts requiring mitigation related to air quality (exposure to sensitive receptors), noise (construction-related effects), cultural resources (construction-related impacts on historic resources and archeological resources), and wind (hazard conditions impacts on surrounding sidewalks). These topics are discussed in the following paragraphs and listed in Table 2-1, Summary of Impacts and Mitigation.

Air Quality

LRCP development would result in a temporary increase in air contaminants and emissions through the use of construction equipment, and an increased number of vehicle trips. Contamination sources would be generated primarily by fugitive dust emissions and exhaust emissions from heavy construction equipment and increased vehicle trips during demolition and construction phases of LRCP development. Excessive exposure of these emissions could have potentially significant effects on sensitive receptors in the immediate vicinity of development sites. However, Mitigation Measure (MM)-AQ-1, Fugitive Dust, and MM-AQ-2, Construction Equipment Requirements, would reduce temporary emissions to less-than-significant levels. Operation of future development under the LRCP would not violate any air quality standards.

Noise

Elevated noise and vibration levels associated with LRCP construction activities, including demolition and use of construction equipment, could create potentially significant noise and vibration levels, impacting sensitive receptors in the project vicinity. Those impacts would be short term, and generated noise and vibration levels would be varied throughout different phases of construction, and dependent on different types of construction equipment in use.

Construction noise levels greater than 80 dBA at 100 feet from LRCP development sites would be disruptive to nearby receptors. While use of most equipment would generate noise levels below the threshold, any use of equipment that would exceed the threshold—such as jackhammers—would be equipped with appropriate noise-control features when used, and would not impact surrounding receptors. Based on a conservative noise reduction of 3 dBA from implementation of MM-NO-1, Noise Reduction, equipment-related noise at 100 feet would be reduced to at least 80 dBA L_{eq}. This mitigation measure would ensure that noise associated with daytime construction activity would be result in a less than significant impact. However, certain construction activities may be necessary between 8:00 p.m. and 7:00 a.m. Occupants at nearby residences and hotels would be sensitive to increased nighttime noise. MM-NO-1 would help control exposure to nighttime noise. Due to lower ambient noise levels at nighttime than daytime, it is anticipated that nighttime construction noise would be audible and would interfere with sleep activity at residences and hotels. Nighttime construction activity that would exceed ambient noise levels at the property line of the site by 5 dBA would result in a significant and unavoidable impact despite the implementation of MM-NO-1.

Mechanical equipment in use during operation of LRCP developments could also generate noise levels exceeding the threshold; MM-NO-2, Mechanical Equipment, would reduce impacts to less-than-significant levels. Traffic generated by LRCP development would not increase traffic noise levels audibly, and this would be a less-than-significant impact.

LRCP construction activity adjacent to residences could generate vibration levels that exceed the annoyance threshold. MM-NO-3, Construction Vibration Reduction, would help reduce exposure to vibration. With mitigation, daytime construction activity would result in a less-than-significant vibration impact. However, if nighttime construction activities were required, construction vibration during the 8:00 p.m. to 7:00 a.m. period that would exceed 80 VdB at residential land uses would result in a significant and unavoidable impact despite the implementation of MM-NO-3, Construction Vibration Reduction.

Cultural Resources

Development under the LRCP would not affect historic resources at the UC Hastings campus. 198 McAllister Street, built in 1953, and 50 Hyde Street, built in 1969, were determined not to be historic architectural resources. Demolition would not be an adverse impact on historic resources.

Demolition and construction activities with the LRCP could result in adverse and potentially significant impacts on cultural resources at LRCP development sites or in the immediate vicinity. Buildings listed as historic resources are also in the immediate vicinity of potential LRCP development sites, and construction at those sites would have the potential to result in structural damage to those adjacent resources. MM-CR-1, Prepare a Historic Property Protection Plan in Conjunction with Demolition and Construction Plans for 198 McAllister Street or 50 Hyde Street, would reduce these potential impacts to less-than-significant levels.

The 100 McAllister Street Tower, built in 1929, is listed on the National Register of Historic Places and the California Register of Historical Resources. 100 McAllister Street is also identified as a contributor to the Uptown Tenderloin National Register Historic District, and San Francisco Planning Code Article 11 lists 100 McAllister Street as a Category I building, meaning "Significant Building, No Alterations." Renovation at 100 McAllister Street would maintain the character-defining features of the building's exterior and interior (including the lobby, dining room/fitness center, coffee shop/student lounge, mezzanine, and Sky Room). MM-CR-2, Implement the Secretary's Standards for Rehabilitation of Historic Buildings, would ensure that renovation of 100 McAllister Street would have a less-than-significant impact on historic resources. The renovation would not impair 100 McAllister Street as a contributing resource to the Uptown Tenderloin Historic District.

LRCP development near the adjacent Civic Center historic districts and the Uptown Tenderloin National Register Historic District, could have a different architectural character then the buildings in the historic districts, but the new buildings would not directly affect architectural resources within the districts, and would not impair the ability of the districts to convey their significance.

Excavation activities during construction phases have the potential to encounter unforeseen archaeological resources or remains, which if disturbed, could result in significant impacts. MM-CR-3, Pre-construction Archaeological Testing, MM-CR-4, Worker Education Awareness, and MM-CR-5, Unanticipated Discoveries of Archaeological Resources, and MM-CR-6, Unanticipated Discoveries of Human Remains, would reduce potential archaeological resource impacts to less-than-significant levels.

Although no Native American tribal representatives contacted UC Hastings to request consultation about potential Tribal Cultural Resources (TCRs), it is possible that unknown prehistoric resources could be uncovered during ground-disturbing activities. Therefore, the potential adverse effects on previously unidentified archeological resources also represent a potentially significant impact on TCRs. Implementation of Mitigation Measure MM-CR-7, Tribal Cultural Resources Interpretive Program, would reduce potential adverse impacts on TCRs to a less-than-significant level.

Wind

LRCP development of structures over 80 feet in height could result in the redirection of winds in such a manner that would cause hazardous wind conditions at the pedestrian level. Wind tunnel testing determined that development of a 140-foot-tall structure at 198 McAllister Street would cause one location near the northwest corner of McAllister and Hyde Streets to exceed the wind hazard criterion of 26 mph by 1 mph, a total of 2 hours per year. The wind tunnel testing analyzed the maximum massing at 198 McAllister Street, and is considered conservative. Future detailed design would likely include architectural features such as setbacks, street and frontage plantings, articulation of building facades, or a variety of materials that would be expected to vary and reduce pedestrian-level wind effects.

MM-WI-1, 198 McAllister Street Building Design Wind Analysis, would require wind tunnel testing of the detailed design of 198 McAllister Street, to identify design features that would eliminate the wind hazard exceedance near the northwest corner of McAllister and Hyde Streets, and would reduce this impact to a less-than-significant level.

Other LRCP development at 333 Golden Gate Avenue or 50 Hyde Street would not generate wind hazard conditions, and would have less-than-significant wind effects.

Table 2-1: Summary of Impacts and Mitigation

<table>
<tr><th>Environmental Impact</th><th>Significance before Mitigation</th><th>Mitigation Measures</th><th>Significance after Mitigation</th></tr>
<tr><td colspan="4">Air Quality</td></tr>
<tr><td>Impact AQ-2: Development under the LRCP could violate an air quality standard or contribute substantially to an existing or projected air quality violation</td><td>Potentially Significant</td><td>MM-AQ-1: Fugitive Dust
The construction contractor shall implement the following specific construction mitigation measures to reduce fugitive dust. Emission reduction measures shall include, at a minimum, the following measures. Alternative measures may be identified by the construction contractor, as appropriate, provided that they are as effective as the following measures. Alternative measures shall be submitted to UC Hastings for approval.
• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
• All haul trucks transporting soil, sand, or other loose material off site shall be covered.
• All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
• All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
• All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
• Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
• All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD phone number will also be visible to ensure compliance with applicable regulations.</td><td>Less than significant</td></tr>
<tr><td>Impact AQ-4: The LRCP could expose sensitive receptors to substantial pollutant concentrations</td><td>Potentially Significant</td><td>MM-AQ-2: Construction Equipment Requirements
The construction contractor shall ensure that equipment of construction activity meets Tier IV emissions standards established by the US Environmental Protection Agency (EPA).</td><td>Less than significant</td></tr>
</table>

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Noise			
Impact NO-1: The LRCP would expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	Potentially Significant	**MM-NO-1: Noise Reduction** UC Hastings shall designate a dedicated public liaison who shall be responsible for addressing public concerns about construction activities, including excessive noise and vibration. The public liaison shall determine the cause of the concern and shall work with the construction contractor to implement feasible, reasonable measures to address the concern. If nighttime construction activity between 8:00 p.m. and 7:00 a.m. is required, UC Hastings shall ensure that advance notice is provided to residences and hotels within 300 feet of the construction site. For all development under the LRCP, the construction contractor shall be required to prepare and submit a comprehensive Noise Control Plan for review and approval by the project engineer. The Noise Control Plan shall be established prior to the start of project construction. The basic goals of the plan are to: • ensure that the contractor is fully aware that noise control is an important issue and that noise abatement must be fully considered in constructing and costing the project; • confirm that construction activities will not significantly increase overall community noise levels; and • provide a means to evaluate the validity of community complaints regarding construction noise. The plan shall establish means and methods for ensuring that construction activities do not exceed the noise impact thresholds at the property boundaries of adjacent noise-sensitive receptors. Specifically, noise levels should not exceed the ambient noise level (CNEL) at the property line of the closest noise-sensitive receptors by more than 5 dB for nighttime construction and mobile sources. The Noise Control Plan may include, but is not limited to the following: • Limiting noise emissions for construction equipment by ensuring that only well-maintained and properly muffled equipment is used at the construction site. • Locating stationary noise sources (such as compressors) as far from adjacent or nearby sensitive receptors as possible. • Undertaking the noisiest activities during times of least disturbance to surrounding residents and occupants, as feasible. • Using impact tools (e.g., jackhammers) that are hydraulically or electrically powered, wherever possible, to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of	Significant and Unavoidable

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		pneumatic tools is unavoidable, exhaust mufflers on the compressed air exhaust apparatuses shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA. • Managing construction traffic to minimize disruption to area residences and existing operations surrounding the construction zones. • Locating staging areas as far away as possible from residences. • Building temporary noise barriers around the construction site. **MM-NO-2: Mechanical Equipment Noise Reduction** Rooftop mechanical equipment at buildings developed under the LRCP shall be enclosed, screened, or otherwise controlled, to reduce noise at the property lines by at least 5 dBA.	
Impact NO-2: The LRCP would result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.	Potentially Significant	**MM-NO-3: Construction Vibration Reduction** UC Hastings shall designate a dedicated public liaison who shall be responsible for addressing public concerns about construction activities, including excessive noise and vibration (see MM-NO-1). The public liaison shall determine the cause of the concern and shall work with the construction contractor to implement feasible, reasonable measures to address the concern. For any construction activities during the 8:00 p.m. to 7:00 a.m. period that would exceed 80 VdB at residential land uses, UC Hastings shall ensure that advance notice is provided to residences and hotels within 500 feet of the construction site. The Noise Control Plan required with MM-NO-1 shall include measures to reduce vibration exposure to the extent feasible, and may include, but not be limited to: • operating earth-moving equipment as far away from vibration-sensitive receptors as possible, and prioritizing use of smaller, lighter-duty equipment when operation is necessary within 45 feet of sensitive receptors in existing buildings; and • phasing demolition and ground-disturbing activity to reduce occurrences in the same time period. **MM-NO-1: Noise Reduction** (see Impact NO-1) **MM-CR-1: Prepare a Historic Property Protection Plan in Conjunction with Demolition and Construction Plans for 198 McAllister Street or 50 Hyde Street** (see Impact CR-2)	Significant and Unavoidable

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact NO-3: The LRCP could result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project	Potentially Significant	**MM-NO-2: Mechanical Equipment** (see Impact NO-1)	Less than significant
Impact NO-4: The LRCP could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project	Potentially Significant	**MM-NO-1: Noise Reduction** (see Impact NO-1)	Less than significant
Cultural Resources			
Impact CR-2: Development under the LRCP could potentially damage contributors to the Uptown Tenderloin Historic District, and those listed in San Francisco Planning Code Article 11	Potentially Significant	**MM-CR-1: Prepare a Historic Property Protection Plan in Conjunction with Demolition and Construction Plans for 198 McAllister Street or 50 Hyde Street** **1a.** A registered structural engineer, with a minimum of 5 years of experience in the rehabilitation and restoration of historic buildings, shall review excavation and shoring plans prepared for the proposed development, if such plans are required. The structural engineer shall prepare a report of findings, recommendations, and any related design modifications necessary to retain the structural integrity of 132–154 McAllister Street and 255 Golden Gate Avenue during demolition, excavation, and construction activities. The structural engineer shall consult with a historical architect or architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards for Historic Architecture.[1] The historical architect shall review designs and specifications for protective barriers required to protect the exposed walls of 132–154 McAllister Street from potential damage caused by construction activities. In addition, the structural engineer (with geotechnical consultation, as	Less than significant

[1] The minimum professional qualifications in historic architecture are a professional degree in architecture or a state license to practice architecture, plus one of the following:

1. At least 1 year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field; or
2. At least 1 year of full-time professional experience on historic preservation projects.

Such graduate study or experience shall include detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects.

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		necessary) shall determine whether, due to the nature of the excavations, soils, method of soil removal, and the existing foundation of 132–154 McAllister Street, the potential for settlement would require underpinning and/or shoring. If underpinning and/or shoring is determined to be necessary, appropriate designs shall be prepared and owners of adjacent buildings need to consent. All documents prepared in accordance with this measure shall be reviewed and approved by a designated representative of UC Hastings upon recommendations from the structural engineer and historical architect. **1b.** Prior to the start of Variant A or Variant B development, a historical architect and a structural engineer shall undertake an existing condition study of 132–154 McAllister Street and 255 Golden Gate Avenue. The purpose of the study would be to establish the baseline condition of the buildings prior to construction, including the location and extent of any visible cracks or spalls. The documentation shall take the form of written descriptions and photographs, and shall include those physical characteristics of the resources that convey their historic significance and that justify their inclusion on, or eligibility for inclusion on, the National Register, California Register, and local register. The documentation shall be reviewed and approved by a designated representative of UC Hastings. The historical architect and structural engineer shall monitor 132–154 McAllister Street and 255 Golden Gate Avenue during construction and any changes to existing conditions would be reported, including, but not limited to, expansion of existing cracks, new spalls, or other exterior deterioration. Monitoring reports shall be submitted to the general contractor in charge of construction and a designated representative of UC Hastings on a periodic basis. The structural engineer shall consult with the historical architect, especially if any problems with character-defining features of a historic resource are discovered. If, in the opinion of the structural engineer in consultation with the historical architect, substantial adverse impacts to historic resources related to construction activities are found during construction, the monitoring team shall inform the general contractor in charge of construction and a designated representative of UC Hastings. UC Hastings shall adhere to the monitoring team's recommendations for corrective measures, including halting construction in situations where construction activities would imminently endanger historic resources. UC Hastings shall establish the appropriate frequency of monitoring and reporting, which shall reflect the demolition and construction methods and	

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		schedule of LRCP projects. Site visit reports and documents associated with claims processing shall be provided to the general contractor in charge of construction and a designated representative of UC Hastings. **1c.** A qualified geologist, or other professional with expertise in ground vibration and its effect on existing structures, shall prepare a study of the potential for vibrations caused by excavation and construction activities associated with the LRCP. Based on the results of the study, specifications regarding the restriction and monitoring of excavation shall be incorporated into the construction contract. If warranted by the method of construction, the structural engineer and geotechnical consultant shall determine threshold levels of vibration and cracking for 132-154 McAllister Street and 255 Golden Gate Avenue prior to construction, and if these are met or exceeded during construction monitoring, then construction techniques would be re-evaluated and altered prior to continuation to ensure that vibration levels would not disturb the historical resources. If there appear to be negative effects from the construction of the new building, the historical architect and structural engineer shall prepare and submit a report to the general contractor in charge of construction and a designated representative of UC Hastings. Damage attributable to construction activities shall be addressed through repair or replacement following the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. **1d.** The historical architect shall establish a training program for construction workers involved in the project that emphasizes the importance of protecting historic resources. This program shall include information on recognizing historic fabric and materials, and directions on how to exercise care when working around and operating equipment near the historic structures, including storage of materials away from historic buildings. It shall also include information on means to reduce vibrations from construction, and monitoring and reporting of any potential problems that could affect the historic resources in the area. A provision for establishing this training program shall be incorporated into the construction contract, and the construction contract provisions shall be reviewed and approved by the general contractor in charge of construction, by affidavit, and by a designated representative of UC Hastings.	

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact CR-3: Renovating and reconfiguring 100 McAllister Street could have a significant impact on historic architectural resources and would not adversely affect the character of the immediate surroundings on the adjacent Uptown Tenderloin and Civic Center Historic Districts	Potentially Significant	**MM-CR-2: Implement the Secretary's Standards for Rehabilitation of Historic Buildings** UC Hastings shall ensure that renovation of the character-defining features of the 100 McAllister Street building's exterior and interior shall be consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards). By following the Secretary's Standards, the proposed changes "shall be considered as mitigated to an impact level of less than significant on the historic resource."[2]	Less than significant
Impact CR-4: The LRCP could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5	Potentially Significant	**MM-CR-3: Pre-construction Archaeological Testing** Prior to construction at LRCP development sites, UC Hastings shall implement a pre-construction archaeological testing program. The testing program will depend upon access to development sites after demolition of existing buildings. UC Hastings shall retain a qualified archaeological consultant to prepare an archaeological testing plan (ATP). The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the LRCP development, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing will be to determine, to the extent possible, the presence or absence of archaeological resources and to identify and evaluate whether any archaeological resource encountered on the site constitutes a historical resource under CEQA. At the completion of the archaeological testing, the archaeological consultant shall submit a written report to UC Hastings. If based on the archaeological testing program, the archaeological consultant finds that significant archaeological resources may be present, UC Hastings—in consultation with the archaeological consultant—shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing and/or archaeological monitoring. In the event that archaeological resources are uncovered, UC Hastings shall implement MM-CR-5.	Less than significant

[2] CEQA Guidelines Section 15064.5(b)(3).

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		MM-CR-4: Worker Education Awareness Prior to the initiation of construction or ground-disturbing activities, all contractor and subcontractor personnel shall receive training regarding the appropriate work practices necessary to effectively implement the mitigation measures that will ensure compliance with the applicable environmental laws and regulations, including the potential for exposing subsurface cultural resources and to recognize possible buried resources. Training shall inform all construction personnel of the anticipated procedures that would be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains and their treatment, as well as any other cultural resources. **MM-CR-5: Unanticipated Discoveries of Archaeological Resources** In the unlikely event that archaeological resources are uncovered during construction, the find shall be secured and the project head foreman shall immediately notify UC Hastings, who will immediately contact a qualified archaeologist to determine the significance of the find. If the resource is deemed significant, additional work may be needed, an archaeological monitor may be necessary for the duration of ground-disturbing construction activities, and UC Hastings shall implement one of the following: • Redesign the proposed LRCP development so as to avoid any adverse impact on the significant archaeological resource. • Implement a Research Design and Data Recovery Program. The Research Design and Data Recovery Program shall include the following elements: field methods and procedures; cataloguing and laboratory analysis; discard and deaccession policy; interpretive program; security measures; final report; and curation. • If UC Hastings and the archaeological consultant determine that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible, UC Hastings shall implement an interpretive program.	

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Impact CR-5: The LRCP could disturb human remains, including those interred outside of formal cemeteries	Potentially Significant	**MM-CR-6: Unanticipated Discoveries of Human Remains** In the unlikely event that human remains or potential human remains are uncovered during construction, the find shall be secured and the project head foreman shall immediately notify UC Hastings, who will immediately contact the San Francisco county coroner and suspend any ground-disturbing activities within 100 feet of the discovery until UC Hastings and/or a qualified archaeologist has determined what additional measures should be undertaken. If the remains are human, the coroner and UC Hastings shall immediately implement the applicable state law, in Sections 5097.9 through 5097.996 of the Public Resources Code. If the remains of Native Americans are identified, the coroner shall notify the Native American Heritage Commission, according to California Health and Safety Code Section 7050.5(c). In addition, California Health and Safety Code Sections 8010-8021 and 8025-8030, provides for the repatriation of human remains and cultural items in the possession or control of a state or local agency or museum to the rightful California Native American tribe. This law defines the term California Native American tribe to include non-federally recognized groups.	Less than significant
Impact CR-6: The project could cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code Section 21074	Potentially Significant	**MM-CR-7: Tribal Cultural Resources Interpretive Program** If UC Hastings determines that a significant archaeological resource is present, and if in consultation with the affiliated Native American tribal representatives, determines that the resource constitutes a tribal cultural resource (TCR) and could be adversely affected by LRCP development, the proposed LRCP development shall be redesigned so as to avoid any adverse impact on the TCR, if feasible. If UC Hastings, in consultation with the affiliated Native American tribal representatives, determines that preservation-in-place of the TCR is not a sufficient or feasible option, UC Hastings shall implement an interpretive program in consultation with affiliated tribal representatives. An interpretive plan, produced in consultation with affiliated tribal representatives, would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of the displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists; oral histories with local Native Americans; artifact displays and interpretation; and educational panels or other informational displays.	Less than significant

Environmental Impact	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Wind			
Impact WI-1: The LRCP could alter wind in a manner that substantially affects public areas	Potentially Significant	**MM-WI-1: 198 McAllister Street Building Design Wind Analysis** Prior to design approval of LRCP development at 198 McAllister Street, UC Hastings shall retain a qualified wind consultant to determine if the building design would result in wind impacts that could exceed the threshold of 26-mph-equivalent wind speed for a single hour during the year. The wind analysis shall be conducted to assess wind conditions for the proposed building in conjunction with the anticipated pattern of development on surrounding blocks. The wind tunnel testing may identify design changes that would mitigate the adverse wind conditions to below the wind hazard criterion threshold. These design changes could include, but are not limited to, wind-mitigating features such as building setbacks, placement of awnings on building frontages, street and frontage plantings, articulation of building facades, or the use of a variety of architectural materials. Implementation of these design changes would reduce the wind hazard impact to a less-than-significant level.	Less than significant
Source: TRC, 2016			

2.4 Unavoidable Significant Impacts

Unavoidable significant impacts were identified in the EIR relating to construction noise and vibration impacts. Depending on specific site conditions or engineering needs, project construction activities could require nighttime construction or use of equipment that could create vibration impacts. While those activities may be limited in duration, those effects would not be avoided with mitigation measures and would be significant unavoidable environmental impacts.

2.5 Summary of Alternatives

As discussed in greater detail in Section 5, Alternatives, this EIR considers three alternatives relating to LRCP development, and their associated environmental impacts, to determine whether or not a variation of the proposed LRCP would reduce or eliminate potentially significant impacts. These alternatives include:

- No Project/No Build Alternative
- 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative
- 198 McAllister Reduced Building Alternative

Under the No Project/No Build Alternative, proposed development with LRCP would not be constructed, and the UC Hasting campus would remain in its existing condition. The No Project/No Build Alternative allows for a comparison of impacts with and without approval of the LRCP.

The 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative would include construction of new buildings up to 80 feet tall at those locations, compared to 140 feet under the proposed LRCP. Under this alternative, development at 333 Golden Gate Avenue and renovation and reconfiguration at 100 McAllister Street would occur as described in the proposed LRCP.

The 198 McAllister Reduced Building Alternative would result in construction of a 140-foot-tall structure at 198 McAllister Street, with portions near the top of the building setback, or terraced, creating a reduction in the building envelope (See Figure 5-1, 198 McAllister Street Alternative Massing). This alternative would also demolish the 50 Hyde Street Annex, and would develop an additional approximately 125 to 170 housing units at that location. Under this alternative, development at 333 Golden Gate Avenue and renovation and reconfiguration of 100 McAllister Street would occur as described in the proposed LRCP.

2.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

While the LRCP would not result in any significant unavoidable impacts, mitigation would be required to reduce environmental issues related to air quality, noise, cultural resources, and wind to less-than-significant-levels. The No Project/No Build Alternative would avoid those potential impacts. The environmentally superior alternative is the alternative (other than the No Project/No Build Alternative) that would result in the least substantial environmental effects of any alternative. The EIR determined that the 198 McAllister Reduced Building Alternative would be the environmentally superior alternative because it would accommodate substantial development on the site while avoiding the creation of a new wind hazard exceedance. (It is noted that MM W-1: 198 McAllister Street Building Design Wind Analysis, would require further analysis of the detailed design of 198 McAllister Street would reduce wind effects to a less-than-significant level.) Other impacts of the 198 McAllister Reduced Building Alternative, with the exception of potential construction noise and vibration impacts, would be less-than-significant, or would be avoided with implementation of mitigation, similar to the proposed LRCP.

2.7 AREAS OF CONTROVERSY TO BE RESOLVED

On the basis of public comments submitted after publication of the EIR Notice of Preparation, and the public scoping meeting held on January 12, 2016, potential areas of controversy and unresolved issues for the LRCP include the following:

- Traffic and transportation impacts and management issues
- Provision of affordable housing
- Shadow impacts
- Visual impacts
- Construction noise impacts
- Construction-related air quality impacts
- Historic resources impacts

3. PROJECT DESCRIPTION

3.1 PROJECT BACKGROUND

The University of California Hastings College of the Law (UC Hastings or the College) was founded in 1878 as the first law department of the University of California, and is the oldest public law school in California. Founded by California Chief Justice Serranus Clinton Hastings, UC Hastings was established by the California Legislature with its own Board of Directors, which operates the College independently of the Board of Regents of the University of California. UC Hastings is the only standalone public law school in the nation.

Since its founding, UC Hastings has been an integral part of the fabric of the City and County of San Francisco. It is strategically located at the intersection of three distinct neighborhoods: (1) Civic Center, where the Supreme, Appellate, and Superior courts of California are located along with the federal District Court and 9th Circuit Court of Appeal and amidst city, state, and federal office buildings, as well as San Francisco's major cultural institutions; (2) Mid-Market, where a growing concentration of technology firms, including Twitter, Zendesk, Square, and many others, are located; and (3) the Tenderloin, a densely populated, primarily residential neighborhood with a diverse population composed of multiple ethnicities and a broad demographic.

The strategic location of UC Hastings is emblematic of its mission to unite the theory and the practice of law by providing an academic program of the highest quality—based upon scholarship, teaching, and research—to a diverse student body, and to assure that its graduates have a comprehensive understanding and appreciation of the law, and are well trained for the multiplicity of roles they will play in a society and profession that are subject to continually changing demands and needs.

Societal and economic change is evident in the community surrounding UC Hastings. Business development in the Mid-Market area and the nascent renewal of the Tenderloin, supported by the steadfastness of the stakeholder institutions of the Civic Center, provide a perfect backdrop for UC Hastings to revitalize its campus to meet the needs of future generations of law students and promote the revitalization of the area for students, workers, and residents alike.

As of 2015, UC Hastings hosts approximately 933 full-time Juris Doctor, Master of Law, and Master of Studies in Law students within its comprehensive academic programs, and extensive and innovative experiential learning and judicial externship programs.

The UC Hastings faculty of approximately 69 full-time and 81 part-time and adjunct faculty members includes a full roster of eminent scholars and professional leaders from a wide range of disciplines, who embody the College's ethos by turning knowledge into action and helping students do the same.

The UC Hastings campus currently consists of five buildings located at 100, 198, and 200 McAllister Street, 50 Hyde Street, and 376 Larkin Street (the UC Hastings Parking Garage), and a vacant lot at 333 Golden Gate Avenue, all of which are on two contiguous blocks between Larkin and Leavenworth Streets, and Golden Gate Avenue and McAllister Street. UC Hastings property locations are shown on Figure 3-1, Project Location.

The existing facilities are described as follows:

- 100 McAllister Street (Block 0348/Lot 006), also known as the Tower, is a 27-story, 249,000-gross-square-foot (gsf) structure constructed in 1929; it primarily serves as student housing, with 252 units and recreational facilities. The Great Hall on the ground floor, which is approximately 11,000 gsf, was originally a church, but is now vacant and awaiting rehabilitation. Educational and research functions at 100 McAllister Street currently utilize approximately 20,000 gsf of the building.

- 198 McAllister Street (Block 0348/Lot 009), known as Snodgrass Hall, is a four-story, 76,000-gsf structure constructed in 1953; it serves as the primary academic facility of UC Hastings, housing the majority of the College's lecture halls and seminar rooms, along with 80 offices.

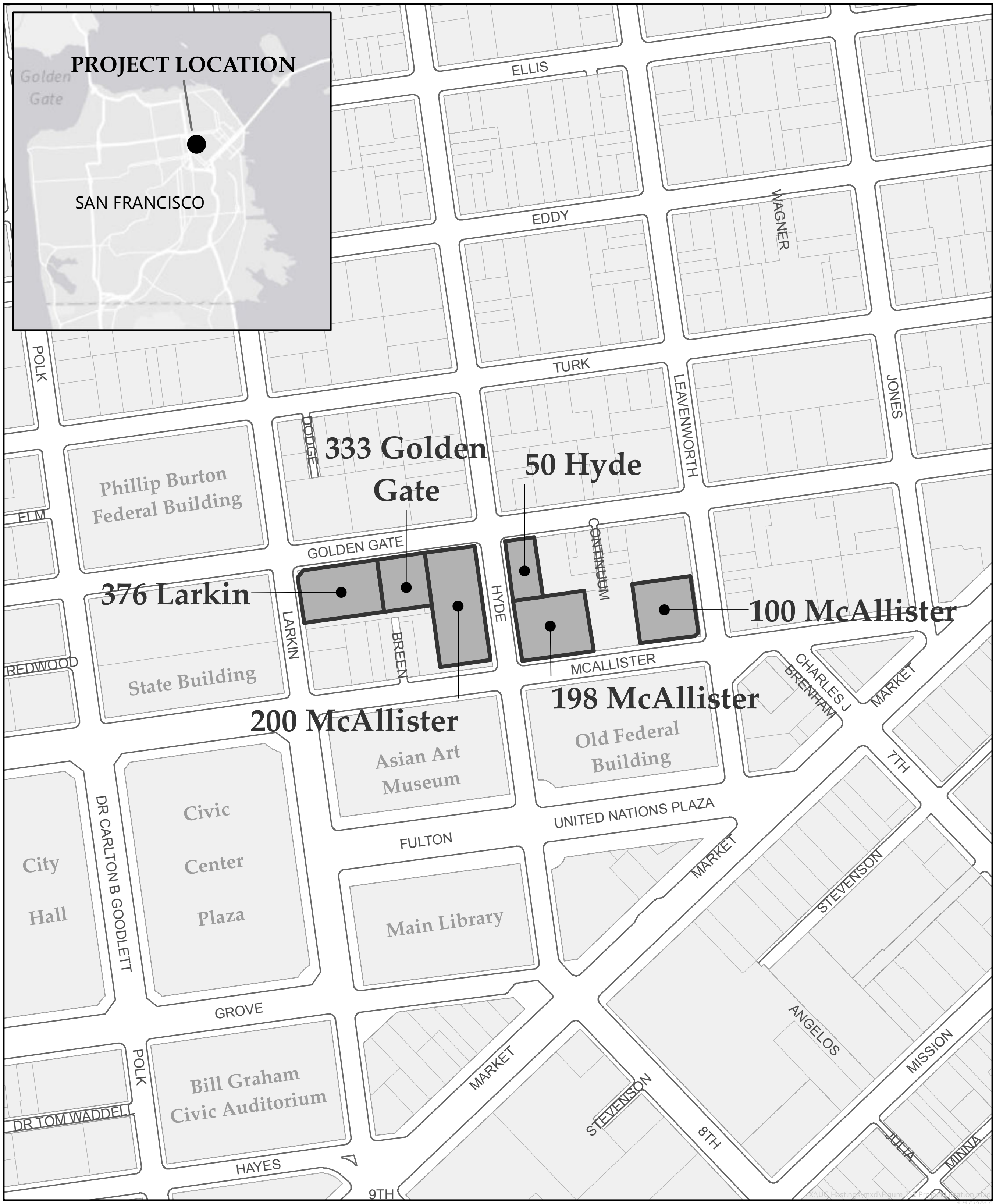
- 50 Hyde Street (Block 0348/Lot 014), known as the Snodgrass Hall Annex, is a four-story, 61,000-gsf structure constructed in 1969 and is immediately adjacent to Snodgrass Hall; it consists of four classrooms, the Marvin and Jane Baxter Appellate Law Center, Moot Court, the Gold Reading Room, and the large Louis B. Mayer multi-purpose hall.

- 200 McAllister Street (Block 0347/Lot 003), known as Mary Kay Kane Hall, is a six-story, 177,000-gsf structure that was constructed in 1980 and renovated in 2007; it houses many UC Hastings faculty and administrative offices, the library, cafeteria, faculty lounge, and various student support facilities.

- The UC Hastings Parking Garage, at 376 Larkin Street (Block 0347/Lot 016), is a seven-story, 157,000-gsf structure constructed in 2009; it provides 395 parking spaces to meet student, faculty, staff, and public parking needs, and houses 13,000 sf of retail space.

- 333 Golden Gate Avenue (Block 0347/Lot 017) is an 11,962-sf asphalt lot currently in use as a garden for community-based environmental education and as a recreational area for UC Hastings students.

- Table 3-1, Existing UC Hastings Facilities, includes a summary of existing UC Hastings facilities.



Source: TRC Solutions, City and County of San Francisco, Esri

UC Hastings Campus

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FIGURE 3-1: PROJECT LOCATION

Table 3-1: Existing UC Hastings Facilities

Building	Land Area (sf)	Building (gsf)	Housing Units	No. of Floors	Primary Program
100 McAllister Street	19,000	249,000	252	27 (+ basement)	Residential
198 McAllister Street	23,000	76,000	-	4 (+ 3 mezzanine)	Academic
50 Hyde Street	9,000	61,000	-	4	Academic/Multipurpose
200 McAllister Street	42,000	177,000	-	6	Academic/Office
376 Larkin Street	26,000	157,000	-	7 (+basement)	Parking
333 Golden Gate Avenue	12,000	0	-	n/a	n/a
Total	**131,000**	**720,000**	252	-	-

Source: UC Hastings. 2015. *Five Year Infrastructure Plan 2016–2021*; 2015. *Five Year Institutional Master Plan.*

3.1.1 UC Hastings Long Range Campus Plan

To complement the renaissance of the Mid-Market area and the changing face of the Tenderloin, UC Hastings focused its Long Range Campus Plan (LRCP) on strategic enhancements of its infrastructure in support of an innovative approach to legal education, reliant upon practical skill and experiential learning, to ensure that its graduates are well equipped to enter the modern legal marketplace.

The UC Hastings LRCP, incorporating the findings and capital proposals of the Five Year Infrastructure Plan 2016–2021, describes the College's efforts in recent years to achieve campus-wide code-compliance and fire/life-safety objectives, as well as other space improvements to improve campus life for students, faculty, and staff. [1]

The Five Year Infrastructure Plan 2016–2021 proposes the following five major infrastructure projects, which are further detailed in Table 3-2, Long Range Campus Plan Projects:

1. Construction of a new, approximately 57,000-gsf academic building on the undeveloped lot at 333 Golden Gate Avenue
2. Demolition of Snodgrass Hall at 198 McAllister Street and construction of a new campus residential building in its place
3. Modernization of 50 Hyde Street; planning options include the possibility of incorporating the academic functionality of 50 Hyde Street into the lower levels of a campus residential complex on the combined 198 McAllister Street and 50 Hyde Street sites
4. Renovation and reconfiguration of the Tower at 100 McAllister Street
5. Renovation and reuse of the Great Hall at 100 McAllister Street

[1] UC Hastings. 2015. *Five Year Infrastructure Plan 2016–2021*. September.

Table 3-2: Long Range Campus Plan Projects

Building	Building (gsf)	Housing Units	Floors	Primary Program
100 McAllister Street	249,000	260–350	27	Residential
198 McAllister Street/50 Hyde Street				
Variant A[1]	288,000	400–600	13	Residential/Multipurpose
Variant B[2]	329,000	525–770	13	Residential/Multipurpose
200 McAllister Street[3]	177,000	-	6	Academic/Office
376 Larkin Street[3]	157,000	-	7	Parking
333 Golden Gate Avenue	57,000	-	8	Academic/Office
Total	**928,000–969,000**	**660–1,120[4]**	-	-

Note:
1 This variant includes renovation of the existing building at 50 Hyde Street and continuance of its current uses (academic/multipurpose).
2 This variant includes demolition of the existing building at 50 Hyde Street and development of the site into campus housing. The existing academic functions housed at 50 Hyde Street would be replicated in the lower floors of a new campus housing facility. The total number of units shown includes those that would be constructed as part of Variant A, with an additional 125–170 units that would be constructed with Variant B.
3 LRCP projects conducted at this site would not result in changes to building square footage, units, floors, or programming.
4 The total number of housing units includes 252 existing units at 100 McAllister Street.

Source: UC Hastings. September 2015. *Five Year Infrastructure Plan 2016–2021*; December 2015. *Five Year Institutional Master Plan.*

Replacement Academic Building at 333 Golden Gate Avenue

To support the educational and infrastructure goals of UC Hastings, California Governor Edmund G. Brown approved the Budget Act of 2015, which appropriated $36.8 million of lease revenue bond financing to construct a new academic building on the vacant lot at 333 Golden Gate Avenue. [2] The State Department of General Services (DGS) would oversee design and development of 333 Golden Gate Avenue through a design-build process consisting of formally structured phases for functional specification, performance criteria development and a design competition, culminating in selection of design architects, in parallel with selection of a general contractor. The team assembled through this public process would execute the building design under DGS stewardship

It is anticipated that the new academic building at 333 Golden Gate Avenue would be approximately 57,000 gsf and approximately 80 feet tall. However, to allow for design and engineering changes, an additional 10 feet in building height, or approximately 90 feet in total

2 The College reviewed the cost effectiveness of renovating 198 McAllister Street. The 198 McAllister Street building is one of the College's least efficient facilities in terms of energy usage and programmatic layout. The building's inefficient and aging building systems and its confused layout contribute to making it three times less efficient—in terms of annual operating costs—than the 200 McAllister Street building completed in 1980. The Engineering Enterprise and Taylor Engineering. 2011. *UC Hastings College of the Law MEP Due Diligence Report, 198 McAllister St, San Francisco.*

height, will be analyzed. The building would replace all academic programming and faculty offices currently in Snodgrass Hall at 198 McAllister Street. The building would provide a more cohesive campus and enable UC Hastings to create state-of-the-art classroom facilities that would serve the College for decades. With a smaller footprint than Snodgrass Hall, the new academic building would benefit from efficient space planning that corresponds with the College's implementation of a reduction in enrollment of 20 to 25 percent to better align the school's population to the needs of the legal marketplace it serves, ensure a better learning environment for its students, and increase opportunities for employment after graduation.

Construction at 333 Golden Gate Avenue is projected to be completed by 2019, with the commencement of instructional operations beginning in the fall 2020 semester.

Demolish Snodgrass Hall and Construct Campus Housing at 198 McAllister Street, Variant A

Upon completion of the new academic building at 333 Golden Gate Avenue, Snodgrass Hall would be demolished to allow for construction of an approximately 13-story, 140-foot-tall (as measured from McAllister Street; 130 feet tall as measured from Golden Gate Avenue), 227,000-gsf building that would provide approximately 400 to 600 housing units, depending upon the square footage of the average unit; approximately 15,000 sf of non-revenue-generating College-serving academic and instructional uses, and/or revenue-generating third-party retail uses on the ground floor to provide student amenities and to activate the street level. Common open space and recreational services would be included for UC Hastings students and staff.

Demolition and development at 198 McAllister Street would occur after 2020 occupancy of 333 Golden Gate Avenue.

Modernize 50 Hyde Street/Demolish and Replace with Campus Housing and Academic/Support Space, Variant B

With the proposed demolition of Snodgrass Hall at 198 McAllister Street, 50 Hyde Street would require major HVAC and other building systems renovation and modernization to maintain important College functions, including the Louis B. Mayer Auditorium, Gold Reading Room, and Moot Court. Further, many of the building systems at 198 McAllister Street that support 50 Hyde Street would need to be replaced when the former building is demolished. Recognizing the need to modernize 50 Hyde Street, the Governor's 2015 Five Year Infrastructure Plan indicated future state support of an additional $6.8 million to modernize the building.

An alternative to modernizing 50 Hyde Street would demolish the building to create an enlarged development site that would allow for a greater increase in campus housing. Extending the proposed approximately 13-story, 140-foot-tall structure at 198 McAllister Street to the site of 50 Hyde Street would increase its size to approximately 329,000 gsf and would allow for an additional approximately 125 to 170 housing units, depending upon the square footage of the average unit; approximately 61,000 sf would be dedicated to academic, administrative, assembly, faculty, and multipurpose/support space on the ground and second floors to replace the existing 50 Hyde Street facilities. Common open space and recreational services would be included for UC Hastings students and staff.

Modernization, demolition, and/or development at 50 Hyde Street would occur after 2020 occupancy of 333 Golden Gate Avenue.

Renovate and Reconfigure the Tower at 100 McAllister Street/Renovate and Reuse the Great Hall

Constructed in 1929, 100 McAllister Street (the Tower) would benefit from seismic strengthening and general building interior upgrade and modernization. The building currently contains 252 units of housing accommodating approximately 280 residents. The development of new housing at 198 McAllister Street would allow UC Hastings to continue providing housing for its students while 100 McAllister Street is renovated.

UC Hastings has conducted reviews of various redevelopment scenarios for the Tower. One scenario would renovate the unfinished space on the 25th and 26th floors of the Tower as additional housing units, with an average unit size of 390 sf. This would increase the total number of housing units from 252 to approximately 260 units. Another scenario would redevelop all existing housing units into an average unit size of 275 sf, which would increase the total number of housing units to approximately 350.

The Tower also includes approximately 36,000 sf of office space dedicated to research, clinical, and fiscal and communications functions, as well as the College's nine law journals. UC Hastings currently plans to relocate most clinical programs to 333 Golden Gate Avenue, and the research centers to the 200 McAllister Street building to use space more efficiently and create additional sources of revenue at the 100 McAllister Street building in the released space. Upon the renovation of 100 McAllister Street, the majority of these office uses would be preserved for UC Hastings or other compatible tenancies, with the exception of the space on the 22nd and 23rd floors currently occupied by the law journals, which may be converted back to residential use.

UC Hastings is currently analyzing the best use for the renovation and reuse of the approximately 11,000-gsf Great Hall, a space complemented by ceiling heights of 70 feet.

Assuming that the new academic building at 333 Golden Gate Avenue is operational by 2020, work at 100 McAllister Street would commence upon the projected completion of the new campus housing facility at 198 McAllister Street in 2022, with projected completion sometime in 2024 or 2025, depending on schedule attainment of other projects in the sequential development queue.

Partnership with the University of California, San Francisco

New campus housing at UC Hastings may be jointly developed with the University of California, San Francisco (UCSF). To further enhance and strengthen its relationship with UCSF and the broader University of California System, in December 2015, UC Hastings entered into a Letter of Intent with UCSF for the development of campus housing at UC Hastings to accommodate the academic and housing needs of UC Hastings and UCSF under their shared affiliation with the University of California System. Shared campus housing would be a natural extension of the existing collaboration between UC Hastings and UCSF on a successful consortium on law, science, and health policy for medical students and law students. Further, UC Hastings and UCSF are studying other partnerships that would include, but not be limited to, police services and student health centers, supplementing existing shared services with between the sister organizations.

Housing units developed under the LRCP would primarily be single occupancy; however, some suites would be included. Up to seven UC Hastings junior faculty or visiting faculty, and up to 50 UCSF faculty may occupy campus LRCP housing.

3.2 PROJECT OBJECTIVES

As a campus located in a densely populated urban environment, UC Hastings is effectively landlocked. UC Hastings seeks to maximize the utilization of its existing properties by emphasizing their periodic renewal and upgrade. Given the College's limited financial resources, the adoption of a capital plan that recognizes the necessity of a phased approach over time is imperative.

The primary drivers of the LRCP, as articulated in the Five-Year Infrastructure Plan, are as follows:

- Modernize and replace the primary academic facility—as required by the outdated core building systems in 198 McAllister Street, where the majority of UC Hastings teaching spaces are located—which is mission critical because failure to do so could severely impair institutional viability.
- Prioritize aggressive reduction of Greenhouse Gas & Short-Lived Climate Pollutants emissions and conservation of fresh water to greatest extent possible given constraints of capital, technology, and existing structures.
- Support the mission and vision of UC Hastings and accommodate changing pedagogies of the College, including the need for more small- to medium-sized interactive classrooms as opposed to large lecture halls.

- Provide campus housing within the reasonable means of public service-oriented students in safe, secure, and code-compliant buildings, reducing carbon footprint through decreased commutes, other efficiencies and lowering market pressures on local housing stock.
- Develop at least 660 units and up to 1,120 units of new campus housing to meet the demonstrated needs of UC Hastings students, UCSF students, and visiting UC Hastings and UCSF faculty.
- Prioritize attention to deferred maintenance to prevent life-safety risks and potential impairments to capital assets.
- Create partnerships with other professional schools, such as UCSF, that leverage common needs for a sustainable, resilient campus footprint that cohesively supports graduate student village culture.

UC Hastings has developed the following set of objectives for the 333 Golden Gate Avenue academic building:

- Modernize UC Hastings classroom and instructional spaces to meet the needs of evolving pedagogy.
- Remediate ADA, life-safety, and core building system deficiencies prevalent in the existing UC Hastings buildings by developing a new facility that leverages highly efficient technologies, materials, and systems, modeling the most sustainable solutions within constraints of budget.
- Increase on-campus amenities and services by programming multi-use space for student functions and activities, potentially including a student center and rooftop social space.
- Maximize campus cohesion and tranquility through common and open space that connects the new academic building at 333 Golden Gate Avenue with the 200 McAllister Street building and the UC Hastings Parking Garage.

3.3 Surrounding Land Uses and Environmental Setting

UC Hastings occupies five buildings and owns one undeveloped lot on the two blocks bounded by Golden Gate Avenue, Larkin Street, McAllister Street and Leavenworth Street, transected by Hyde Street, one block north of the San Francisco Civic Center (see Figure 3-1, Project Location).

The areas northeast and northwest of the campus include residential, commercial, and office uses (often with ground floor retail). Areas to the south include numerous civic uses, primarily associated with the Civic Center, including cultural, institutional, and educational uses owned by various local, state, and federal agencies.

In particular, the southwestern portion of the McAllister-Larkin-Golden Gate-Hyde block—which is adjacent to the UC Hastings Parking Garage at 376 Larkin Street and Mary Kay Kane Hall at 200 McAllister Street—is occupied by older apartment structures, many with ground-floor retail uses. The northern portion of the McAllister-Hyde-Golden Gate-Leavenworth block fronting Golden Gate Avenue and Leavenworth Street—which is adjacent to Snodgrass Hall and 100 McAllister Street—is occupied by a newer residential structure and older commercial structures. Mixed-use buildings are on the McAllister frontage between the UC Hastings buildings.

Many of the properties in these areas consist of older, four- to six-story apartment buildings with ground floor commercial uses. The six-story, 80-foot-tall California State Building at 350 McAllister Street is west of the campus, and is connected to the 14-story, 200-foot-tall State Office Building at 455 Golden Gate Avenue.

The 20-story, 300-foot-tall Phillip Burton Federal Building at 450 Golden Gate Avenue is northwest of the project site. The old Federal Office Building at 50 United Nations Plaza is immediately south of the UC Hastings buildings located at 100 and 198 McAllister Street.

The Civic Center area includes the city-designated Civic Center Historic District, the federally designated Civic Center National Register Historic District, the Civic Center National Register Landmark District, and the Uptown Tenderloin National Register Historic District. As such, the Civic Center contains numerous buildings that are individual landmarks or are contributory to the historic districts. The project site is located just north and east of these Civic Center Historic District boundaries. The Civic Center Powerhouse at 320 Larkin Street (corner of Larkin and McAllister Streets), south of the project site, is listed as noncontributory to the city-designated Civic Center Historic District. The Uptown Tenderloin National Register Historic District—which includes portions of approximately 33 blocks, roughly bounded by Market, McAllister, Golden Gate, Larkin, Geary, Taylor, Ellis, and Mason—includes the 100 McAllister Street building (the Tower) within its boundaries, and the building is listed as a contributory resource to the historic district.

As a state entity, UC Hastings is not subject to City and County of San Francisco's jurisdiction or its planning and land use controls. For information, the UC Hastings campus includes sites designated in the San Francisco Planning Code as P – Public Uses, consistent with the current educational uses; the 100 McAllister Street building is in a C-3-G, Downtown Commercial – General district, which permits educational and residential uses; and the 333 Golden Gate Avenue lot and UC Hastings Parking Garage are in RC-4, Residential-Commercial High Density districts, which allow high-density residential, commercial and institutional uses.

The Environmental Impact Report (EIR) will further describe San Francisco Planning Code and other San Francisco zoning and planning conditions for reference and informational purposes.

3.4 CEQA Analysis of Long Range Campus Plan Projects

333 Golden Gate Avenue Construction

The new building at 333 Golden Gate Avenue would replace the College's existing primary academic facilities. Construction at 333 Golden Gate Avenue is projected to be completed by 2019, with the commencement of instructional operations beginning in the fall 2020 semester.

As noted previously, after approval by UC Hastings, DGS would oversee the development of 333 Golden Gate Avenue through a design-build process. DGS would develop design guidelines and performance criteria in 2016, which must be subsequently approved by the State Department of Finance and State Public Works Board. After a Request for Qualifications process, three finalist design-build teams would submit competing designs through early 2017. With the selected team under contract, the design-build phase would commence from mid-2017 through 2019, with occupancy by fall of 2020. Therefore, the LRCP EIR will analyze the effects of 333 Golden Gate Avenue at a program level of detail.

Potential Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Upon the completion of the replacement academic building at 333 Golden Gate Avenue, the LRCP calls for demolition of the existing 198 McAllister Street building and development of the site as a housing facility. The new building would be approximately 13 stories (140 feet) tall, 227,000 gsf, and would provide approximately 400 to 600 campus housing units (depending on unit size), with approximately 15,000 sf of non-revenue-generating College-serving academic and instructional uses and/or revenue-generating third-party retail uses on the ground floor to provide student amenities and to activate the street level.

This scenario is referred to hereinafter as Variant A. No detailed design for 198 McAllister Street has been developed. Therefore, the LRCP EIR will analyze the effects of Variant A at a program level of detail.

The renovation-only option for 50 Hyde Street would be considered exempt from California Environmental Quality Act (CEQA) under CEQA Guidelines Section 15301, Maintenance of Existing Facilities, and will not be addressed further.

Potential Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

As with Variant A, Variant B would include development of the 198 McAllister Street site as a campus residential facility, with approximately 400 to 600 housing units (depending on unit size) and ground-floor commercial or retail space and/or UC Hastings facilities. Variant B would also demolish the 50 Hyde Street Annex, and would develop approximately 102,000 gsf with an additional approximately 125 to 170 housing units, depending upon the square footage of the average unit, and approximately 61,000 sf dedicated to academic, administrative, assembly, faculty, and multipurpose/support space on the ground and second floors of the combined 198 McAllister and 50 Hyde Street sites to replace space formerly in the demolished 50 Hyde Street Annex.

Variant B would include a total of approximately 329,000 gsf, with 525 to 770 campus housing units, and approximately 64,000 gsf of retail, academic, administrative, assembly, faculty, and multipurpose/support space.

No detailed design for Variant B has been developed. Therefore, this EIR will analyze Variant B effects at a program level of detail.

100 McAllister Street Renovation

Renovation of 100 McAllister Street would build out unfinished space on the 25th and 26th floors as additional housing units, to increase the total number of housing units from 252 to 260. Another scenario would build out unfinished space on the 25th and 26th floors and redevelop all existing housing units into an average unit size of 275 sf to increase the total number of housing units to 350. As noted previously, some of the lower floors of the Tower also house approximately 36,000 sf of research, clinic, and fiscal and communications office space. UC Hastings currently plans to relocate the research centers and clinics to the 200 McAllister Street and 333 Golden Gate Avenue buildings to utilize space more efficiently and create additional sources of revenue at the 100 McAllister Street building with the released space.

The renovation project would include fire, life-safety, and seismic upgrades. Refurbishment of the Tower's exterior would comply with the Secretary of the Interior's Standards for a historic resource.

UC Hastings is currently analyzing the best options for renovation and reuse of the Great Hall.

The LRCP EIR will analyze the effects of the renovation of 100 McAllister Street at a program level of detail.

3.5 LONG RANGE CAMPUS PLAN DEVELOPMENT SCHEDULE

The anticipated schedule for the initial LRCP project at 333 Golden Gate Avenue includes the following benchmarks:

- The selected Master Architect develops design guidelines and performance criteria through September 2016.
- The Department of Finance and the Public Works Board approve the design guidelines and performance criteria in October 2016.

- Three design-build teams compete from October 2016 through January 2017, developing conceptual drawings and project approach, management plans, and schedules.
- Final negotiations with the selected design-build team and execution of the design-build agreement occur from February 2017 through May 2017.
- The design-build phase proceeds from June 2017 through December 2019; 333 Golden Gate Avenue construction occurs over approximately 18 months, and is complete in 2019.
- Subsequent demolition and redevelopment of the 198 McAllister Street or 50 Hyde Street buildings occurs in 2020, with construction and occupancy in later years.

3.6 LONG RANGE CAMPUS PLAN AND PROJECT APPROVALS

UC Hastings is the Lead Agency under CEQA, and is also the Project Sponsor. The following approval steps and uses of the EIR are anticipated:

- The UC Hastings Board of Directors shall review and consider the Final Environmental Impact Report (FEIR), certify the FEIR, and adopt the Mitigation Monitoring and Reporting Program (MMRP). This certification shall include the findings that the FEIR has been completed in compliance with CEQA and the UC Hastings CEQA guidelines.
- After the Board of Directors certifies the FEIR, the Board can approve the LRCP. That action shall state that the Board considered the information contained in the Final EIR before approving the LRCP.
- The State Public Works Board will consider the FEIR findings and MMRP as part of the 333 Golden Gate Avenue design guidelines and performance criteria in the Request for Proposal documents. The final Design-Build Agreement will incorporate the LRCP MMRP.
- Future UC Hastings development projects will be reviewed in light of the FEIR and CEQA Guidelines Sections 15162, 15163, 15164, and 15168(c), to determine whether the projects' effects would require further environmental review

UCSF is a Responsible Agency under CEQA Guidelines Section 15381, because it could participate in the joint development of housing after adoption of the LRCP by the UC Hastings Board of Directors. The Regents of the University of California or its designee will adopt CEQA findings based upon the LRCP FEIR at the time it approves the business transaction for joint development of campus housing with UC Hastings.

3.7 USES OF THIS EIR

This EIR is a Program EIR under CEQA Guidelines Section 15168(a), as the LRCP is a series of logical parts in a chain of contemplated actions. As LRCP projects are refined, UC Hastings will examine the projects in light of CEQA Guidelines Sections 15162 and 15168(c), and determine whether the project's effects would require further environmental review. If UC Hastings finds that no new or substantially more severe effects would occur and new mitigation measures are not required, UC Hastings could approve the project as being within the scope of the LRCP EIR. If the later project could have effects not identified in the LRCP EIR, UC Hastings could prepare a Supplement to the LRCP EIR, under Guidelines Section 15163, or an Addendum to the LRCP EIR, under Guidelines Section 15164.

4. ENVIRONMENTAL EVALUATION

Chapter 4 includes analysis, by issue area, of the potential effects of the proposed Long Range Campus Plan (LRCP) development projects on the environment. Each environmental issue section includes a discussion of the following topics:

- Setting
- Impacts and Mitigation Measures
- Cumulative Impacts

The environmental issues analyzed in this chapter are as follows:

4.1 Aesthetics
4.2 Air Quality
4.3 Cultural Resources
4.4 Geology and Soils
4.5 Greenhouse Gas Emissions
4.6 Land Use and Planning
4.7 Noise
4.8 Transportation
4.9 Shadow
4.10 Wind

As identified in the Initial Study published on December 14, 2015 (see Appendix A), the proposed LRCP would not have significant adverse impacts, or would have less than significant impacts with implementation of mitigation measures as part of the LRCP, for the following environmental issues:

Agricultural and Forest Resources
Biological Resources
Hazards and Hazardous Materials
Hydrology/Water Quality
Mineral and Energy Resources
Population/Housing
Public Resources
Utilities and Service Systems

Therefore, no further evaluation of these environmental issues is necessary in this chapter. See the Initial Study in Appendix A for a discussion of impacts that were not found to be significant.

FORMAT OF ISSUE SECTIONS

Impacts are numbered and shown in bold type, and the corresponding mitigation measures, where identified, are numbered and indented following the impact statements. Impacts and mitigation measures are numbered consecutively within each topic and include an abbreviated reference to the impact section (e.g., AQ). The following symbols are used for individual topics:

AQ: Air Quality
CR: Cultural Resources
GE: Geology and Soils
GH: Greenhouse Gas Emissions
LU: Land Use
NO: Noise
TR: Transportation
SH: Shadow
WI: Wind

PUBLIC RESOURCES CODE SECTION 21099

Senate Bill (SB) 743 became effective on January 1, 2014, and added Section 21099 to the California Public Resources Code. Among other provisions, Public Resources Code Section 21099(d)(1) changed the typical analysis of aesthetics and parking impacts for urban infill projects and eliminated the measurement of auto delay, including Level of Service (LOS), as a metric that can be used for measuring traffic impacts in transit priority areas.[1]

Aesthetics and Parking Analysis

Public Resources Code Section 21099 provides that the "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."

Therefore, aesthetics and parking are no longer considered when determining if a project has the potential to result in significant environmental effects, for projects that meet all of the following three criteria:

a) The project is in a transit priority area

b) The project is on an infill site

c) The project is residential, mixed-use residential, or an employment center

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1 SB 743 can be found online at: leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id= 201320140SB743.

The proposed LRCP meets each of the three criteria, and thus, this Environmental Impact Report (EIR) does not consider aesthetics and the adequacy of parking in determining the significance of project impacts under CEQA.

Under Public Resources Code Section 21099, a Lead Agency will continue to maintain the authority to consider aesthetic impacts pursuant to other discretionary powers; aesthetics impacts do not include impacts on historical or cultural resources.

UC Hastings recognizes that the public and decision-makers may, however, be interested in information regarding aesthetic effects of the proposed LRCP. Therefore, Section 4.1, Aesthetics, of this EIR includes and discusses "existing" and "proposed" visual simulations of general massing envelopes of potential development under the UC Hastings LRCP. As noted in Section 4.1, this information is not used to determine the significance of environmental impacts of the LRCP, pursuant to Public Resources Code Section 21099.

UC Hastings also recognizes that parking conditions may be of interest to the public and the decision-makers. Therefore, this EIR presents parking demand analysis for informational purposes and considers any secondary physical impacts associated with constrained supply (e.g., queuing by drivers waiting for scarce on-site parking spaces that could affect a public right-of-way) as applicable in the analysis in Section 4.8, Transportation.

Level of Service Analysis

New Public Resources Code Section 21099 was implemented via SB 743 and requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines that establish criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the "reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also allows OPR to develop alternative metrics outside of transit priority areas. The statute provides that, upon certification and adoption of the revised CEQA Guidelines by the Secretary of the Natural Resources Agency, automobile delay—as described solely by level of service or similar measures of vehicular capacity or traffic congestion—shall not be considered a significant impact on the environment pursuant to CEQA. Thus, LOS generally shall not be used as a significance threshold under CEQA.

Since September 2013, OPR has published three documents to implement SB 743. The third document, Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA, was published for public review and comment in January 2016. OPR's proposed changes to the guidelines recommend replacing automobile delay, as described by LOS, with vehicle miles traveled (VMT) criteria. VMT measures the amount and distance that a project might lead people to drive, including the number of passengers within a vehicle, rather than the congestion it creates at an intersection. Because the amended CEQA Guidelines are still under review, the transportation discussion herein presents LOS analysis. However, the impact conclusions note the expected guideline changes under SB 743. As presented in Section 4.8, development with the LRCP would not generate significant adverse transportation impacts under LOS criteria. Additionally, under VMT criteria—presented for information in the EIR—LRCP development would not generate significant transportation impacts.

4.1 AESTHETICS

This section describes potential aesthetic and visual impacts that could occur with development under the LRCP. Public Resources Code Section 21099(d), contained in Senate Bill (SB) 743, effective January 1, 2014, provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."

Public Resources Code Section (a)(1) defines employment center project as a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area. Public Resources Code Section (a)(4) defines "infill site" as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. Public Resources Code Section (a)(7) defines transit priority area as an area within 0.5 mile of an existing major transit stop.

Development with the LRCP would satisfy the three requirements outlined in Public Resources Code Section 21099(d), including (1) the UC Hastings campus is in a transit priority area, (2) the LRCP uses would be on infill sites, and (3) development with the LRCP would be residential, mixed-use residential, or an employment center.

UC Hastings is within 0.5 mile of major transit stops, including the adjacent Civic Center, BART/Muni Metro, and other Muni bus and streetcar lines on Market Street, as well as various Muni bus stops located along other campus frontages. The LRCP would include redeveloping UC Hastings buildings and properties that would be on infill sites in an area of urban uses. Finally, LRCP development of campus housing and academic buildings, with floor area ratios greater 0.75 with ground-floor retail would be consistent with residential, retail, and employment center uses in the area.

Therefore, the LRCP would meet the criteria of Public Resources Code Section 21099(d), and the information within this section is included for informational purposes only.

4.1.1 Setting

The UC Hastings campus is in the downtown Civic Center neighborhood of San Francisco, and encompasses five buildings and one undeveloped lot on the two blocks bounded by Golden Gate Avenue to the north, Larkin Street to the west, McAllister Street to the south, and Leavenworth Street to the east (see Figure 3-1, Project Location, in Chapter 3, Project Description). The aesthetic and visual environment of UC Hastings and the surrounding area is characterized by dense urban development amid mid- to high-rise buildings, urban streetscapes, and public spaces.

The existing UC Hastings buildings at 198 McAllister Street, 50 Hyde Street, and 200 McAllister Street are 75- to 85-foot-tall academic and administrative buildings constructed from 1953 to 1980. The UC Hastings Parking Garage at 376 Larkin Street was completed in 2009. These buildings exhibit a range of mid-century and more contemporary architectural styles. The undeveloped lot at 333 Golden Gate Avenue is used by UC Hastings as an aboveground demonstration garden and for outdoor recreation. That site is asphalt-paved and abutted by 200 McAllister Street to the east, the parking garage to the west, and residential/mixed-use buildings to the south, fronting McAllister Street. The 308-foot-tall 100 McAllister Street building (the Tower) was constructed in 1929. The building was designed in the style of Gothic Revival, and along with nearby City Hall, is one of the most prominent buildings in the Civic Center area. The demonstration garden at 333 Golden Gate Avenue, the plaza at the base of 198 McAllister Street, and the entrance court to 200 McAllister Street are open spaces associated with UC Hastings. Figure 4.1-1, Viewpoint Locations, indicates the location of views shown in Figure 4.1-2, View Southwest from Golden Gate Avenue and Hyde Street, through Figure 4.1-11, View South from Hyde Street and Turk Street - Variant B.

Primarily five- to six-story residential, mixed-use, commercial, and office buildings are located to the northeast and northwest. The San Francisco Civic Center, located to the south and west, includes city, state, and federal buildings up to 20 stories tall, including the Supreme, Appellate, and Superior courts of California. The core of the Civic Center area is composed of classic Greek Revival structures, which set the architectural character of the area. Several public plazas are located in the immediate vicinity of UC Hastings, offering aesthetic and visual resources.

Civic Center Plaza, which occupies a 4.43-acre double block west of UC Hastings, is a primary aesthetic and visual resource in the Civic Center area. The plaza is bounded by McAllister, Larkin, Grove, and Polk Streets, and includes rows of flagpoles and landscaped grass panels along its north and south sides. Rows of pollarded sycamore trees, bisected by a crushed gravel strip, occupy the center of the plaza. The northeast and southeast corners of the plaza, along Larkin Street, each contain a playground. All other areas of the plaza are paved walking areas.

Civic Center Plaza is visually bounded by major civic and public buildings, including City Hall to the west, Bill Graham Civic Auditorium to the south, the Main Library and Asian Art Museum to the east (adjacent to the south of UC Hastings), and the California State Office Building to the north (adjacent to the west of UC Hastings). These buildings, along with the 20-story Phillip Burton Federal Building approximately one block from UC Hastings, are visible at various locations from UC Hastings and the surrounding vicinity.

Source: Square One Productions

FIGURE 4.1-1: VIEWPOINT LOCATIONS

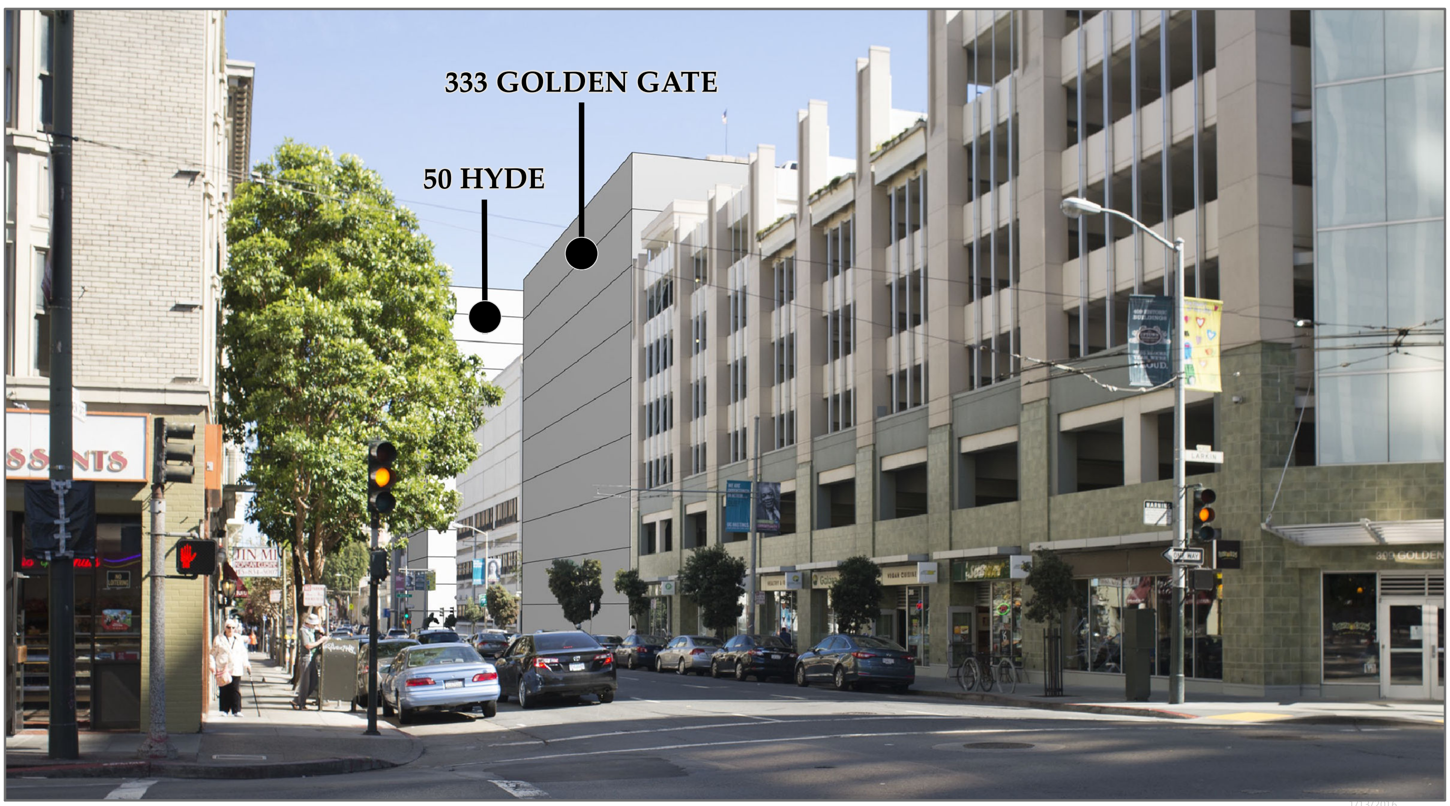
EXISTING

PROPOSED

Source: Square One Productions

FIGURE 4.1-2: VIEW SOUTHWEST FROM GOLDEN GATE AVENUE AND HYDE STREET

EXISTING



PROPOSED

Source: Square One Productions

FIGURE 4.1-3: VIEW EAST FROM GOLDEN GATE AVENUE AND LARKIN STREET

EXISTING

PROPOSED

Source: Square One Productions

FIGURE 4.1-4: VIEW NORTHEAST FROM CIVIC CENTER - VARIANT A

EXISTING

PROPOSED

Source: Square One Productions

FIGURE 4.1-5: VIEW NORTHEAST FROM CIVIC CENTER - VARIANT B

EXISTING

PROPOSED

Source: Square One Productions

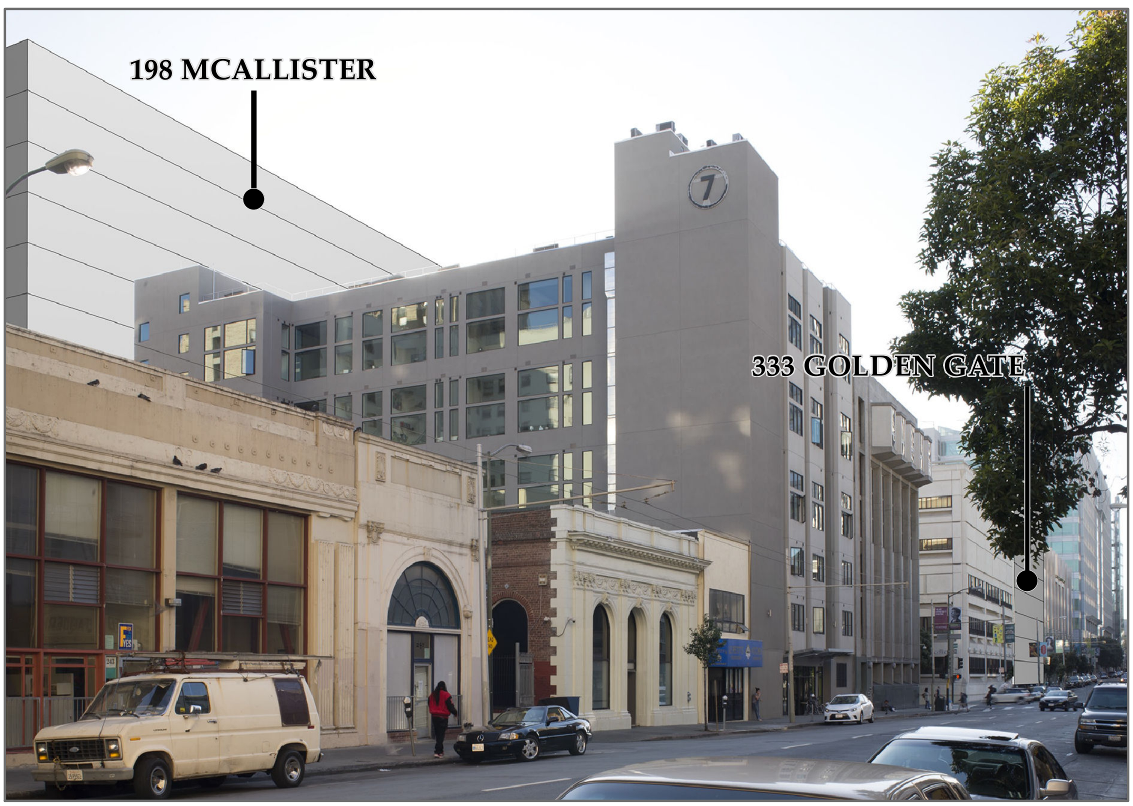
FIGURE 4.1-6: VIEW NORTH FROM HYDE STREET - VARIANT A

EXISTING

PROPOSED Source: Square One Productions

FIGURE 4.1-7: VIEW NORTH FROM HYDE STREET - VARIANT B

EXISTING



PROPOSED

Source: Square One Productions

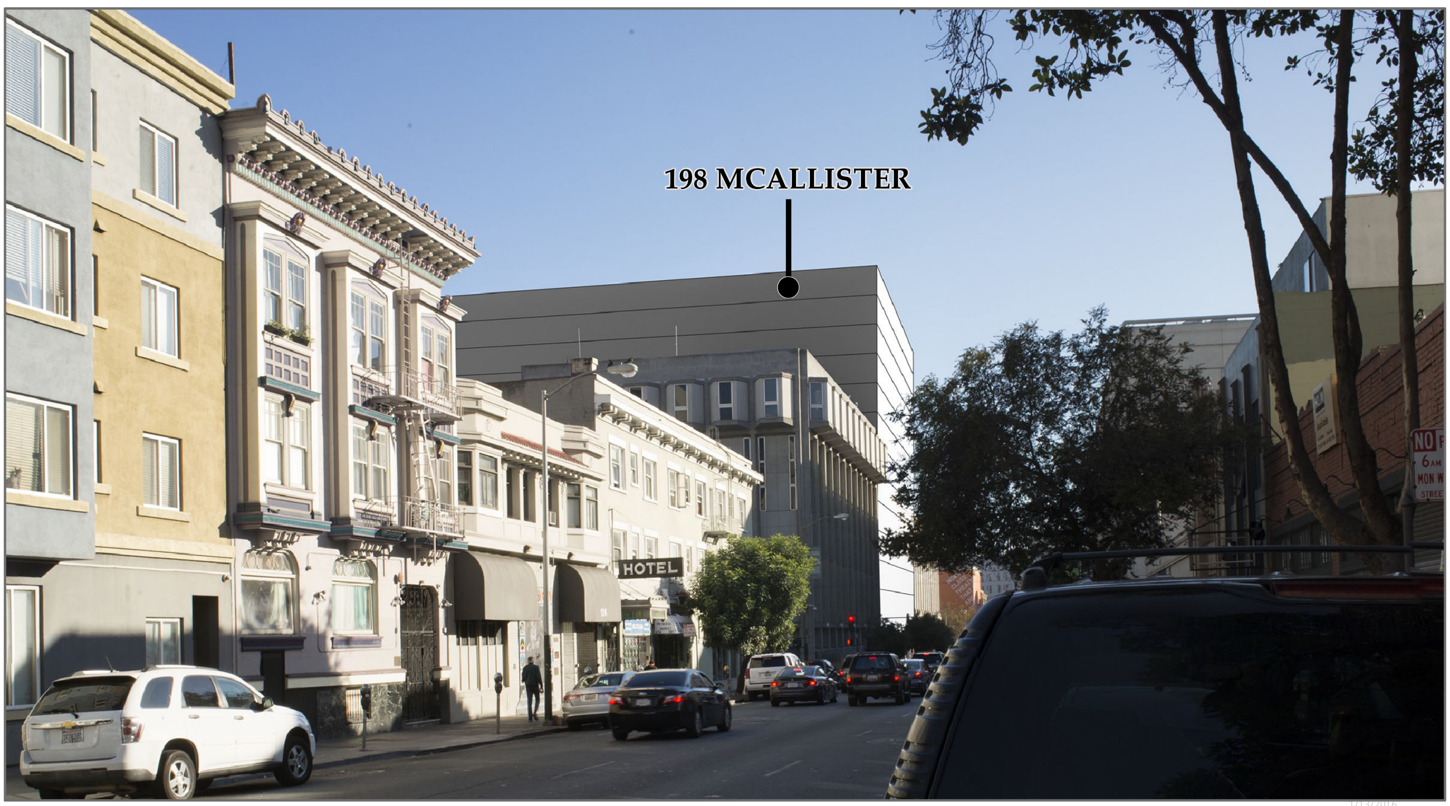
FIGURE 4.1-8:VIEW SOUTHWEST FROM GOLDEN GATE AVENUE NEAR LEAVENWORTH STREET - VARIANT A

EXISTING

PROPOSED Source: Square One Productions

FIGURE 4.1-9: VIEW SOUTHWEST FROM GOLDEN GATE AVENUE NEAR LEAVENWORTH STREET - VARIANT B

EXISTING



PROPOSED

Source: Square One Productions

FIGURE 4.1-10: VIEW SOUTH FROM HYDE STREET AND TURK STREET - VARIANT A

EXISTING

PROPOSED

Source: Square One Productions

FIGURE 4.1-11: VIEW SOUTH FROM HYDE STREET AND TURK STREET - VARIANT B

United Nations (UN) Plaza, directly south of UC Hastings across McAllister Street, is another visual resource near the campus. The irregularly shaped plaza is bounded by McAllister, Hyde, and Market Streets. The plaza is paved with red brick, with the exception of several landscaped panels that contain either grass or crushed gravel and pollarded trees. UN Plaza also includes a large fountain structure near Market Street and Seventh Street. The plaza is visually bounded by the previously described civic buildings, as well as the Market Street streetscape. City Hall is also directly visible from UN Plaza, looking west.

The Phillip Burton Federal Building Plaza is visible northwest of the UC Hastings Parking Garage at Larkin and McAllister Streets. The plaza fronts Golden Gate Avenue, at the base of the 20-story Phillip Burton Federal Building, and bounded by Polk and Larkin Streets to the west and east, respectively. The plaza is completely paved with the exception of several small rows of street trees.

Transit is another key resource that contributes to the aesthetic character of the area. UC Hastings is within a transit priority area, and resources such as the UN Plaza are major portals for public transit for Bay Area Rapid Transit (BART) and Muni Metro service. Various Muni bus stops are located along all campus frontages.

Many of the buildings in the surrounding vicinity, including the UC Hastings Parking Garage at 376 Larkin Street, offer street-level commercial/retail space, creating a community environment at the street level.

4.1.2 Impacts and Mitigation

Significance Criteria

As previously noted, Public Resources Code Section 21099(d) would apply to the LRCP, and these criteria were used for this analysis. Under these requirements, for a project not to be considered to have significant impacts it must: (1) be in a transit priority area, (2) be on an infill site, and (3) be a residential, mixed-use residential, or employment center development.

As noted in Section 4.1.1, Setting, UC Hastings is in a transit priority area, and is within 0.5 mile of major transit stops, including the adjacent Civic Center, BART/Muni Metro, and other Muni bus and streetcar lines on Market Street, as well as various Muni bus stops located along other campus frontages. The LRCP would include redeveloping UC Hastings buildings and properties that would be on infill sites. Finally, LRCP development of campus housing and academic buildings with ground-floor retail would be consistent with residential, retail, and employment center uses in the area. Because the proposed LRCP development projects would meet the three previously described criteria, aesthetic impacts would not be considered significant.

Methodology

To describe changes in aesthetic and visual conditions with development under the LRCP, the EIR includes a series of existing views in the UC Hastings vicinity, and visual simulations of simplified massing of potential LRCP development. Because design-build considerations for LRCP development projects are not anticipated to occur until 2017, a full-site rectangular massing was used to present aesthetic effects of all potential projects. UC Hastings is not subject to City and County of San Francisco jurisdiction; however, San Francisco codes and policies are provided for informational purposes. Those codes and policies are not considered for purposes of evaluating significant environmental impacts.

The LRCP includes proposed development as part of campus-wide upgrades; proposed LRCP development would be subject to California Public Resources Code Section 21099(d), which deems aesthetic impacts in the LRCP area not significant. Therefore, potential aesthetic impacts are analyzed for informational purposes only.

Impacts

Impact AE-1 The project would not have a substantial adverse effect on a scenic vista. ***No Impact***

LRCP development projects—which would contribute to aesthetic changes in the area—would be located within the Downtown/Civic Center area of San Francisco, which is densely urbanized; therefore, no scenic vistas would be affected. Aesthetic resources in the area—most notably, Civic Center Plaza—offer unobstructed views of landmark buildings like City Hall and the Bill Graham Civic Auditorium. LRCP development projects would include a new, up to 90-foot-tall academic building on the currently undeveloped lot at 333 Golden Gate Avenue, and would replace the 198 McAllister Street building, and potentially the 50 Hyde Street building, with new, up to 140-foot-tall campus housing buildings. However, development projects at UC Hastings would not substantially obstruct views of these resources and would not affect any scenic vistas, as discussed further in the following paragraphs.

Views of and around the campus are available from surrounding streets and open space areas. LRCP development would change the visual conditions and character of UC Hastings, and therefore, views from surrounding public vantage points would be altered. Visual simulations were prepared to illustrate visual changes from six representative vantage points surrounding UC Hastings. As previously noted, the visual simulations represent full-site rectangular massing. As described in Chapter 3, Project Description, architectural plans will proceed after the LRCP is adopted. The location and visual effect of LRCP development from these viewpoints, along with existing conditions, are depicted in Figure 4.1-1, Viewpoint Locations, through Figure 4.1-11, View South from Hyde Street and Turk Street - Variant B.

A brief comparison of the existing and proposed visual conditions related to these vantage points is provided as follows:

- **Viewpoint 4.1-2**: As shown in Figure 4.1-2, View Southwest from Golden Gate Avenue and Hyde Street, existing views from this location primarily include the north facade of 200 McAllister Street and the UC Hastings Parking Garage. Fencing at the street level around the undeveloped 333 Golden Gate Avenue lot is visible between the two buildings. The State Office Building is also visible beyond the UC Hastings Parking Garage. As shown in the proposed view, the up to 90-foot-tall 333 Golden Gate Avenue academic building would be predominantly visible from this viewpoint; however, the new building would partially obstruct views of the UC Hastings Parking Garage abutting 333 Golden Gate Avenue. Views of the State Office Building would not be obstructed.

- **Viewpoint 4.1-3**: As shown in Figure 4.1-3, View East from Golden Gate Avenue and Larkin Street, existing views from this vantage point primarily include the UC Hastings Parking Garage, including ground-floor retail frontages. The 200 McAllister Street building is also visible beyond the parking garage. A mixed-use commercial and residential building is in view across Golden Gate Avenue from UC Hastings. As shown in the proposed view, the 333 Golden Gate Avenue academic building and the 50 Hyde Street campus housing building (with Variant B) would be visible from this vantage point. However, the new building would not substantially change existing views from this vantage point.

- **Viewpoint 4.1-4**: As shown in Figure 4.1-4, View Northeast from Civic Center - Variant A, and Figure 4.1-5, View Northeast from Civic Center - Variant B, the existing view from the northeast corner of Civic Center Plaza is primarily of the Asian Art Museum and of the State Office Building in the foreground. Beyond these buildings, various commercial and mixed-use residential buildings are visible. The UC Hastings Parking Garage is visible, but is obstructed from full view by buildings in the foreground. The upper floors of the 200 McAllister Street building are also visible. Background views include a residential tower at 288 Ellis Street, visible beyond the UC Hastings Parking Garage, as well as the 100 McAllister Street Tower, beyond the Asian Art Museum. Variant A depicts views with the development of buildings at 333 Golden Gate Avenue and 198 McAllister Street. Variant B views also include 50 Hyde Street development. The visual simulation shows that the top portions of all LRCP development projects would be visible from this Civic Center Plaza vantage point. Development at 198 McAllister Street and 50 Hyde Street would be visible adjacent to and beyond the Asian Art Museum; however, those changes in views would not substantially change views from Civic Center Plaza of surrounding urban development. The 333 Golden Gate Avenue building would slightly obstruct views of the residential tower from Civic Center Plaza; however, it would not create a major visual change.

- **Viewpoint 4.1-5**: As shown in Figure 4.1-6, View North from Hyde Street - Variant A, and Figure 4.1-7, View North from Hyde Street - Variant B, the existing view is primarily of the

Old Federal Building at 50 UN Plaza in the foreground, with the 198 McAllister or 50 Hyde Street buildings beyond. Other views from this location include various commercial and residential buildings on Hyde Street north of Golden Gate Avenue in the background. The 198 McAllister Street and 50 Hyde Street projects, as depicted in Variants A and B, respectively, would be predominantly visible in this foreground view. The up to 140-foot-tall buildings would replace existing 75- to 85-foot-tall buildings. While the new structures would be of a greater height, the visual change would not change major views of existing buildings, including the Old Federal Building.

- **Viewpoint 4.1-6**: As shown in Figure 4.1-8, View Southwest from Golden Gate Avenue near Leavenworth Street - Variant A, and Figure 4.1-9, View Southwest from Golden Gate Avenue near Leavenworth Street - Variant B, the existing view from this location is primarily of the mixed-use buildings located east of 50 Hyde Street, and commercial storefronts along Golden Gate Avenue. Portions of the 50 Hyde Street building, 200 McAllister Street building, UC Hastings Parking Garage, and the State Office Building are also partially visible west of the 277 Golden Gate Avenue mixed-use building. With Variant A, the top portion of the 198 McAllister Street project would be visible adjacent south of 277 Golden Gate Avenue, and the 333 Golden Gate Avenue building would be visible as part of the streetscape of 200 McAllister Street and the UC Hastings Parking Garage. With Variant B, the 50 Hyde Street building would be predominantly visible immediately west of the 277 Golden Gate Avenue building, similar to conditions with Variant A development at 198 McAllister Street, with predominantly the upper portion of the new building visible. The visual simulation shows that all UC Hastings projects would increase building heights, but would not obstruct any major existing views of buildings or open space

- **Viewpoint 4.1-7**: As shown in Figure 4.1-10, View South from Hyde Street and Turk Street - Variant A, and Figure 4.1-11, View South from Hyde Street and Turk Street - Variant B, the existing view is of low-rise residential buildings along the east side of Hyde Street, with the existing 50 Hyde Street and 198 McAllister Street buildings partially visible beyond those structures. The visual simulations show that development of 198 McAllister Street with Variant A would increase the height of the building on that site. The development of 50 Hyde Street with Variant B would also increase the height and overall scale on that site, but would not alter any major views beyond UC Hastings.

Impact AE-2 The project would not substantially degrade the existing visual character or quality of the site and its surroundings. ***No Impact***

With the exception of the undeveloped lot at 333 Golden Gate Avenue, the UC Hastings campus consists of five completely developed properties, with buildings ranging from 75 feet to 308 feet tall. The LRCP would involve construction of a new, up to 90-foot-tall academic building at 333 Golden Gate Avenue, and new buildings that would be a maximum of 140 feet tall at 198 McAllister Street and potentially 50 Hyde Street. Development under the LRCP would moderately change the visual character of UC Hastings sites, but the visual quality of the Civic Center and Tenderloin areas would continue to be a mix of uses, architectural character, and varying building heights and scale.

Existing UC Hastings buildings have been constructed over a wide time period and reflect different architectural styles. LRCP development projects—including 333 Golden Gate Avenue, Variant A, or Variant B—would involve new, updated design. Upgrades to the 100 McAllister Street Tower would preserve the visual appearance of the building exterior.

Development under the LRCP would not change the overall visual character of the Civic Center area, including the government, performing arts, and civic buildings, and public open spaces that provide views of those buildings and of the neighborhood.

Impact AE-3 The project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area or that would substantially impact other people or properties. *Less-than-Significant Impact*

LRCP development projects—including a new, up to 90-foot-tall academic building at the 333 Golden Gate Avenue site and redevelopment of the existing 198 McAllister Street site, and potentially the existing 50 Hyde Street site, with up to 140-foot-tall campus housing buildings—would contribute new sources of light and glare to the area.

Specifically, the 333 Golden Gate Avenue academic building would contribute a new source, as the property is currently undeveloped, and a new 90-foot-tall building would have the potential to create glare in public areas in the vicinity. Residential and mixed-use structures are north and south of the potential development site. However, the academic building would be adjacent to the existing UC Hastings building at 200 McAllister Street and the UC Hastings Parking Garage, which would substantially reduce the potential for light or glare to affect nearby areas. All building design with the LRCP would incorporate features—such as stucco finish materials—to avoid adverse light and glare. Glass surfaces would not be mirrored, highly reflective, or densely tinted glass. These features would be in alignment with San Francisco Planning Department guidelines and policies that have been established to avoid adverse glare effects related to new construction. As an academic building, it is anticipated that use of the 333 Golden Gate Avenue building would primarily occur during daytime hours, thus limiting nighttime lighting conditions.

Redevelopment of the 198 McAllister Street building—and potential redevelopment of the 50 Hyde Street building with campus housing—would incrementally increase the amount of light due to the increased building height and change from academic to residential uses. Nighttime lighting with residential buildings would increase compared to academic uses, and would potentially be visible within the immediate vicinity. However, this would create typical urban lighting conditions found in the Civic Center and Tenderloin neighborhoods. All LRCP building designs would incorporate the features noted previously to avoid adverse effects of light and glare.

Therefore, LRCP projects would not contribute new sources of light or glare in levels uncharacteristic of the dense urban environment. For these reasons, potential LRCP projects would have a less-than-significant impact related to light and glare.

4.1.3 Cumulative Impacts

The proposed LRCP development projects would consist of either residential or mixed-use projects on infill sites, located within a transit priority area. Thus, the impacts of LRCP development projects on aesthetic and visual resources would not be considered significant under Public Resources Code Section 21099(d), and would not contribute to cumulative impacts on aesthetic resources in the area.

4.2 AIR QUALITY

4.2.1 Setting

This section provides an overview of the existing air quality conditions in the UC Hastings and San Francisco area, presents the regulatory framework for air quality management, and analyzes the potential for the proposed LRCP to affect existing air quality conditions, both regionally and locally, due to activities that emit criteria and non-criteria air pollutants. It also analyzes the types and quantities of emissions that would be generated on a temporary basis due to proposed construction activities, as well as those generated over the long term due to proposed operation of development under the LRCP. The analysis determines whether those emissions would be significant in relation to applicable air quality standards and identifies feasible mitigation measures for significant adverse impacts. The section also includes a discussion of odor impacts and an analysis of cumulative air quality impacts. The analysis in this section is based on a review of existing air quality conditions in the region and air quality regulations administered by the United States Environmental Protection Agency (EPA), the California Air Resources Board (CARB), and the Bay Area Air Quality Management District (BAAQMD).

Pollutants and Effects

The federal and state governments have established ambient air quality standards for outdoor concentrations of seven common pollutants, called criteria pollutants, to protect public health. The criteria pollutant standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Criteria pollutants include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter 10 microns or less in diameter (PM_{10}), and lead (Pb). The primary pollutants of concern in the UC Hastings area are O_3, CO, and PM. Toxic air contaminants (TACs) and Diesel Particulate Matter (DPM) are also discussed, although no federal or state air quality standards exist for these pollutants. Principal characteristics surrounding these pollutants are discussed in the following paragraphs.

Carbon Monoxide

CO is a colorless, odorless gas emitted from combustion processes. In urban areas, the majority of CO emissions in ambient air come from mobile sources. CO can cause harmful health effects by reducing oxygen delivery to the body's organs (like the heart and brain) and tissues.

Ozone

Ground-level O_3 is not emitted directly into the air, but is created by chemical reactions between nitrogen oxides (NO_X) and volatile organic compounds (VOCs) in the presence of sunlight. Emissions from industrial facilities and electric utilities, motor vehicle exhaust, gasoline vapors, and chemical solvents are some of the major sources of NO_X and VOCs. Breathing ozone can trigger a variety of health problems, particularly for children, the elderly, and people of all ages who have lung diseases such as asthma. Ground-level O_3 can also have harmful effects on sensitive vegetation and ecosystems.

Nitrogen Dioxide

NO_2 is one of a group of highly reactive gases known as nitrogen oxides. Other nitrogen oxides include nitrous acid and nitric acid. The EPA's National Ambient Air Quality Standards (NAAQS) use NO_2 as the indicator for the larger group of nitrogen oxides. NO_2 forms quickly from emissions from cars, trucks, and buses, power plants, and off-road equipment. In addition to contributing to the formation of ground level O_3 and fine particle pollution, NO_2 is linked with a number of adverse effects on the respiratory system.

Sulfur Dioxide

SO_2 is one of a group of highly reactive gases known as sulfur oxides. The largest sources of SO_2 emissions are from fossil fuel combustion at power plants and other industrial facilities. Smaller sources of SO_2 emissions include industrial processes, such as extracting metal from ore, and the burning of high sulfur-containing fuels by locomotives, large ships, and non-road equipment. SO_2 is linked with a number of adverse effects on the respiratory system.

Particulate Matter

PM is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles. The size of particles is directly linked to their potential for causing health problems. The EPA is concerned about particles that are 10 microns in diameter or smaller because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. The EPA groups particle pollution into two categories. Inhalable coarse particles include PM_{10}, and fine particles include $PM_{2.5}$. These particles can be directly emitted from sources such as forest fires, or they can form when gases are emitted from power plants, industries, and automobiles react in the air.

Numerous scientific studies have linked particle pollution exposure to a variety of problems, including premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, and increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing. People with heart or lung diseases, children, and older adults are the most likely to be affected by particle pollution exposure. However, even healthy persons may experience temporary symptoms from exposure to elevated levels of particle pollution.

Toxic Air Contaminants

Many pollutants are identified as TACs because of their potential to increase the risk of developing cancer or because of their acute or chronic health risks. For TACs that are known or suspected carcinogens, the CARB has consistently found that there are no levels or thresholds below which exposure is risk free. Individual TACs vary greatly in the risks they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another. TACs are identified and the California Office of Environmental Health Hazard Assessment studies their toxicity. TACs are a category of air pollutants that have been shown to have an impact on human health, but are not classified as criteria pollutants.

TACs are generated by a number of sources, including stationary sources, such as dry cleaners, gas stations, auto body shops, and combustion sources; mobile sources, such as diesel trucks, ships, and trains; and area sources, such as farms, landfills, and construction sites. Ten TACs have been identified through ambient air quality data as posing the greatest health risks in California. Adverse health effects of TACs can be carcinogenic (cancer causing), short-term (acute) non-carcinogenic, and long-term (chronic) non-carcinogenic. Direct exposure to these pollutants has been shown to cause cancer, birth defects, damage to the brain and nervous system, and respiratory disorders. For certain TACs, a unit risk factor can be developed to evaluate cancer risk. For acute and chronic health risks, a similar factor, called a Hazard Index, is used to evaluate risk.

TACs do not have ambient air quality standards, but are regulated by the BAAQMD using a risk-based approach. This approach uses a health risk assessment to determine what sources and pollutants to control, as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.[1]

In addition to monitoring criteria pollutants, both the BAAQMD and the CARB operate TAC monitoring networks in the San Francisco Bay Area. These stations measure 10 to 15 TACs, depending on the specific station. The TACs selected for monitoring are those that have traditionally been found in the highest concentrations in ambient air, and therefore, tend to produce the most significant risk. The BAAQMD operates an ambient TAC monitoring station at its 16th and Arkansas Streets facility in San Francisco. When TAC measurements at this station are compared to ambient concentrations of various TACs for the Bay Area as a whole, the cancer risks associated with mean TAC concentrations in San Francisco are similar to those for the Bay Area as a whole. Therefore, the estimated average lifetime cancer risk resulting from

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[1] In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk, then the applicant is subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, calculating the increased risk of cancer as a result of exposure to one or more TACs.

exposure to TAC concentrations monitored at the San Francisco station does not appear to be any greater than for the Bay Area as a region.

Diesel Particulate Matter

The CARB identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.[2] The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Mobile sources, such as trucks and buses, are among the primary sources of diesel emissions, and concentrations of DPM are higher near heavily traveled highways. The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other toxic air pollutant routinely measured in the region.

Roadway-Related Pollutants

Motor vehicles are responsible for a large share of air pollution, especially in California. Vehicle tailpipe emissions contain diverse forms of particles and gases, and also contribute to particulates by generating road dust and through tire wear. Epidemiologic studies have demonstrated that people living in proximity to freeways or busy roadways have poorer health outcomes, including increased asthma symptoms and respiratory infections, and decreased pulmonary function and lung development in children. Air pollution monitoring done in conjunction with epidemiological studies has confirmed that roadway-related health effects vary with modeled exposure to particulate matter and NO_2. In traffic-related studies, the additional non-cancer health risk attributable to roadway proximity was seen within 1,000 feet of the roadway and was strongest within 300 feet. As a result, the CARB recommends that new sensitive land uses not be located within 500 feet of a freeway or urban roads carrying 100,000 vehicles per day.[3] However, this recommendation is not applicable to the LRCP, because it would not place sensitive receptors within 500 feet of a freeway or urban roads carrying 100,000 vehicles per day. For informational purposes, in 2008, the City of San Francisco adopted amendments to the Health Code (discussed in Section 4.2.1, Setting), requiring new residential

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2 California Air Resources Board. 1998. Fact Sheet, The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines. October. Online: http://www.arb.ca.gov/toxics/dieseltac/factsht1.pdf. Site visited on December 2, 2015.

3 This recommendation is put forth to minimize potential non-cancer health effects of exposure to pollutants known to increase incidence of asthma and other respiratory ailments, particularly fine particulates, as well as cancer risk from exposure to DPM and chemicals from automobile exhaust. The CARB notes that these recommendations are advisory and should not be interpreted as defined “buffer zones,” and acknowledges that land use agencies must balance other considerations, including housing and transportation needs, the benefits of urban infill, community economic development priorities, and other quality of life issues. With careful evaluation of exposure, health risks, and affirmative steps to reduce risk where necessary, CARB’s position is that infill development, mixed-use, higher density, transit-oriented development, and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level (CARB. Air Quality and Land Use Handbook. See footnote 41, p. 67).

projects near high-volume roadways to be screened for exposure hazards, and where indicated, to conduct an analysis of exposure and to mitigate hazards through design and ventilation.

Regional and Local Air Quality Conditions

In addition to the pollutants described previously, other air quality issues of concern in the San Francisco Bay Area Air Basin (SFBAAB) include nuisance effects of odors and dust. Objectionable odors may be associated with a variety of pollutants. Odors rarely have direct health effects, but they can be unpleasant and can lead to anger and concern over possible health effects among the public. Each year, the BAAQMD receives thousands of citizen complaints about objectionable odors.[4]

Similarly, nuisance dust may be generated by a variety of sources including quarries, agriculture, grading, and construction. Dust emissions can contribute to increased ambient concentrations of PM_{10}, and can also contribute to reduced visibility and soiling of exposed surfaces.

Local Climate

The San Francisco Peninsula region extends from northwest of San Jose to the Golden Gate Bridge. The Santa Cruz Mountains run up the center of the peninsula, with elevations exceeding 2,000 feet at the southern end, decreasing to 500 feet in South San Francisco. Coastal towns experience a high incidence of cool, foggy weather in the summer. Cities in the southeastern peninsula experience warmer temperatures and fewer foggy days because the marine layer is blocked by the ridgeline to the west. San Francisco lies at the northern end of the peninsula. Because most of San Francisco's topography is below 200 feet, marine air is able to flow easily across most of the City, making its climate cool and windy.

At the northern end of the peninsula in San Francisco, pollutant emissions are high, especially from motor vehicle congestion. Localized pollutants, such as CO, can build up in “urban canyons.” Winds are generally fast enough to carry the pollutants away before they can accumulate. In the vicinity of the UC Hasting campus, the average wind speed is approximately 10 miles from the northwest.[5]

The annual average temperature in the vicinity of the UC Hastings campus is approximately 57 degrees Fahrenheit (°F).[6] The area experiences an average winter temperature of approximately 52°F and an average summer temperature of approximately 60° F. Total precipitation averages approximately 21 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer.

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[4] Ibid.

[5] As recorded at the San Francisco/International Airport Wind Monitoring Station.

[6] As recorded at the San Francisco Mission Dolores Station.

Air Monitoring Data

BAAQMD monitors air quality conditions at more than 30 locations throughout the Bay Area. The nearest air monitoring station is the Arkansas Street Monitoring Station, approximately 1.4 miles southeast of the UC Hastings campus. Due to its close vicinity, the Arkansas Street Monitoring Station is representative of air quality conditions experienced at the project site. Historical data from this station was used to characterize existing conditions within the vicinity of the campus, and to establish a baseline for estimating future conditions. Table 4.2-1, 2010–2014 Ambient Air Quality Data, summarizes ambient air quality conditions recorded during the 2010 to 2014 period.

The San Francisco Department of Public Health has created a map that displays $PM_{2.5}$ concentrations resulting from vehicle emissions.[7] The map shows potential roadway exposure zones, which means those areas—mainly near freeways and major roadways—with high $PM_{2.5}$ concentrations considered attributable to local roadway traffic sources. Relative to other roadways throughout San Francisco, the LRCP area experiences a high level of air pollution from transportation sources and associated high levels of air pollution health risks.

In addition to monitoring criteria air pollutants, both the BAAQMD and CARB operate TAC monitoring networks in the Bay Area. These stations measure 10 to 15 TACs, depending on the specific station. The TACs selected for monitoring are those that have traditionally been found in the highest concentrations in ambient air, and therefore, tend to be substantial contributors to community health risk. The BAAQMD operates an ambient TAC monitoring station at its Arkansas Street Monitoring Station, which is the only monitoring site for air toxics in the City.

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[7] City and County of San Francisco Department of Public Health Environmental Health Section. 2011. Proportion of Streets with Annual Average Daily $PM_{2.5}$ Emissions 0.2 ug/m^3 or Greater. Online: http://www.sf-planning.org /ftp/files/citywide/Central_Corridor/CC_PublicRealmExistingConditionsReport_Oct2011.pdf. Site visited on December 2, 2015.

Table 4.2-1: 2010–2014 Ambient Air Quality Data

Pollutant	Pollutant Concentration & Standards	Number of Days Above State Standard				
		2010	2011	2012	2013	2014
Ozone	Maximum 1-hr concentration (ppm) Days > 0.09 ppm (state 1-hr standard) Maximum 8-hr Concentration (ppm) Days > 0.07 ppm (state 8-hr standard) Days > 0.075 ppm (federal 8-hr standard)	0.079 0 0.051 0 0	0.070 0 0.054 0 0	0.069 0 0.048 0 0	0.069 0 0.059 0 0	0.079 0 0.069 0 0
Carbon Monoxide	Maximum 1-hr concentration (ppm) Days > 20 ppm (state1-hr standard) Days > 35 ppm (federal 1-hr standard) Maximum 8-hr concentration (ppm) Days > 9 ppm (state 8-hr standard) Days > 9.0 ppm (federal 8-hr standard)	n/a 1.37 0 0	n/a 1.20 0 0	n/a 1.19 0 0	n/a n/a	n/a n/a
Nitrogen Dioxide	Maximum 1-hr concentration (ppm) Days > 0.18 ppm (state 1-hr standard) Days > 0.100 (federal 1-hr standard)	0.093 0 0	0.093 0 0	0.124 0 1	0.073 0 0	0.084 0 0
Respirable Particulate Matter (PM_{10})	Maximum 24-hr Concentration (μg/m³) Estimated days > 50 μg/m³ (state 24-hr standard) Estimated days > 150 μg/m³ (federal 24-hr standard)	38.6 0 0	43.7 0 0	50.6 1 0	41.9 * 0	34.5 * 0
Fine Particulate Matter ($PM_{2.5}$)	Maximum 24-hr concentration (μg/m³) Estimated days > 35 μg/m³ (federal standard)	45.3 3	47.5 2	35.7 1	48.5 2	33.2 0

Note: ppb = parts per billion; ppm = parts per million
Source: CARB. 2015. Air Quality Data Statistics Top 4 Summary. Online: http://www.arb.ca.gov/adam/topfour/topfour1.php. Site visited on December 2, 2015.

Table 4.2-2, Measurements of Carcinogenic Toxic Air Contaminants Concentrations at Arkansas Street Station and Estimated Cancer Risk from Lifetime Exposure, shows ambient concentrations of carcinogenic TACs measured at the Arkansas Street Station, and the estimated cancer risks from lifetime (i.e., 70 years) exposure to these substances. When TAC measurements at this station are compared to ambient concentrations of various TACs for the Bay Area as a whole, the cancer risks associated with mean TAC concentrations in the City are similar to those for the Bay Area. Therefore, the estimated average lifetime cancer risk resulting from exposure to TAC concentrations measured at the Arkansas Street air monitoring station do not appear to be any greater than for the Bay Area as a region.

Table 4.2-2: Measurements of Carcinogenic Toxic Air Contaminants Concentrations at Arkansas Street Station and Estimated Cancer Risk from Lifetime Exposure

Substance	Concentration[1]	Cancer Risk Per Million[2]
Gaseous TACS	(ppb)[3]	
Acetaldehyde	0.50	2
Benzene	0.19	18
1,3-Butadiene	0.037	14
Para-Dichlorobenzene	0.15	10
Carbon Tetrachloride	0.092	24
Ethylene Dibromide	0.006	3
Formaldehyde	1.28	9
Perchloroethylene	0.011	0.4
Methylene Chloride	0.108	0.4
Methyl Tertiary Butyl Ether (MTBE)	0.26	0.3
Chloroform	0.025	0.6
Trichloroethylene	0.010	0.1
Particulate TACs	**(ng/m^3)[3]**	
Chromium (Hexavalent)	**0.045**	**7**

Notes:
1 All values are from BAAQMD 2015 monitoring data from the Arkansas Street Station, except for Para-Dichlorobenzene (2006), Ethylene Dibromide (1992), and MTBE (2003).
2 Cancer risks were estimated by applying published unit risk values to the measured concentrations.
3 ppb=parts per billion; ng/m^3 = nanograms per cubic meter
Source: CARB. 2015. Annual Toxic Summaries by Monitoring Site. Online: http://www.arb.ca.gov/adam/toxics/sitesubstance.html. Site visited on December 10, 2015.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. The BAAQMD defines sensitive receptors as children, adults, and seniors occupying or residing in residential dwellings, schools, daycare centers, hospitals, and senior-care facilities.[8] Typically, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

8 BAAQMD. 2012. *Recommended Methods for Screening and Modeling Local Risks and Hazards*, page 12.

The closest sensitive receptors located within 1,000 feet of the UC Hastings campus include:

- On-site campus housing at 100 McAllister Street
- Plaza Ramona Apartments neighboring the project site on the south side, with receptors located approximately within 20 feet
- Madonna Senior Residences, approximately 20 feet north
- Hampton Court Apartments, approximately 100 feet northwest
- St. Boniface Church and DeMarillac Academy, approximately 150 feet east
- Classic Suites Apartments, approximately 200 feet east
- C5 Children's School, approximately 266 feet west
- Oasis Apartments, approximately 300 feet north
- Kelly Cullen Community Apartments, approximately 500 feet east
- Mosser Towers and Cameo Apartments, approximately 550 feet northeast
- Compass Children's Center, approximately 750 feet east-northeast
- Civic Center Residences, approximately 750 feet east
- 201 Turk Apartments, approximately 870 feet east-northeast
- Eastern Park Apartments, approximately 900 feet northwest

The previously listed receptors are located within Air Pollutant Exposure Zone, Inset 2.[9]

Regulations

Federal

The Federal Clean Air Act (CAA) governs air quality in the United States. The EPA is responsible for enforcing the CAA. The EPA is also responsible for establishing the NAAQS. The NAAQS are required under the 1977 CAA and subsequent amendments. The CAA requires the EPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The current attainment status, with respect to federal standards along with the applicable standards, is summarized in Table 4.2-3, Federal and State Air Quality Standards and Attainment Status. The SFBAAB is a nonattainment area for O_3 and $PM_{2.5}$.

[9] BAAQMD. April 2014. Air Pollution Exposure Zone Map. Online: https://www.sfdph.org/dph/files/EHSdocs/AirQuality/AirPollutantExposureZoneMap.pdf. Site visited on December 2, 2015.

Table 4.2-3: Federal and State Air Quality Standards and Attainment Status

Pollutant	Averaging Period	Federal		California	
		Standards	Attainment Status	Standards	Attainment Status
Ozone	1-hour	No federal standard	No federal standard	0.09 ppm (180 μg/m³)	Nonattainment
	8-hour	0.075 ppm (147 μg/m³)	Nonattainment	0.070 ppm (137 μg/m³)	Nonattainment
Respirable particulate matter (PM_{10})	24-hour	150 μg/m³	Unclassified	50 μg/m³	Nonattainment
	Annual Arithmetic Mean	No federal standard	No federal standard	20 μg/m³	Nonattainment
Fine Particulate Matter ($PM_{2.5}$)	24-hour	35 μg/m³	Nonattainment	No state standard	No state standard
	Annual Arithmetic Mean	12.0 μg/m³	Attainment	12 μg/m³	Nonattainment
Carbon Monoxide	8-hour	9 ppm (10 mg/m³)	Attainment/ Maintenance	9.0 ppm (10 mg/m³)	Attainment
	1-hour	35 ppm (40 mg/m³)	Attainment/ Maintenance	20 ppm (23 mg/m³)	Attainment
Nitrogen Dioxide	Annual Arithmetic Mean	53 ppb (100 μg/m³)	Attainment	0.030 ppm (57 μg/m³)	Attainment
	1-hour	100 ppb (188 μg/m³) /a/	Unclassified	0.18 ppm (338 μg/m³)	Attainment
Sulfur dioxide	24-hour	0.14 ppm (365 μg/m³)	Attainment	0.04 ppm (105 μg/m³)	Attainment
	1-hour	75 ppb (196 μg/m³)	Attainment	0.25 ppm (655 μg/m³)	Attainment
Lead	30-day average	--	Attainment	1.5 μg/m³	Attainment
	Calendar Quarter	1.5 μg/m³	Attainment	No state standard	No state standard
	Rolling 3-Month Average	0.15 μg/m³	--	No state standard	No state standard
Visibility reducing particles	8-hour	No federal standard		Extinction coefficient of 0.23 per kilometer	Unclassified
Sulfates	24-hour	No federal standard		25 μg/m³	Attainment
Hydrogen sulfide	1-hour	No federal standard		0.03 ppm (42 μg/m³)	Unclassified

Note: ppm = parts of million; μg/m³ = micrograms per cubic meter
Source: U.S Environmental Protection Agency. 2015. Green Book Nonattainment Areas for Criteria Pollutants. October. Online: http://www3.epa.gov/airquality/greenbook/. Site visited on December 13, 2015.

In addition to the criteria pollutants, the air toxics provisions of the CAA require the EPA to develop and enforce regulations to protect the public from exposure to airborne contaminants that are known to be hazardous to human health. In accordance with Section 112 of the CAA, the EPA establishes National Emission Standards for Hazardous Air Pollutants. The list of hazardous air pollutants (HAPs), or air toxics, includes specific compounds that are known or suspected to cause cancer or other serious health effects.

State

California Air Resources Board

In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California, the CCAA is administered by the CARB at the state level, and by the air quality management districts and air pollution control districts at the regional and local levels. CARB is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA requires all air districts in the state to endeavor to achieve and maintain the CAAQS. CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. The CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications. The CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. Table 4.2-3 summarizes state air quality standards and SFBAAB attainment status. The SFBAAB is a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$.

California Building Standards Commission

The California Building Standards Code Title 24 is published by the California Building Standards Commission (CBSC) and it applies to all building occupancies throughout the State of California. The CBSC is responsible for overseeing the adoption and publication of the provisions in Title 24 of the California Building Standards Code. Title 24 applies to all building occupancies and related features and equipment throughout the state; contains requirements for structural, mechanical, electrical, and plumbing systems; and requires measures for energy conservation, green design, construction and maintenance, fire and life safety, and accessibility. Relevant rules and standard conditions include the following:

- Building Energy Efficiency Standards (Title 24, Part 6)
- California Green Building Code (Title 24, Part 11)

Regional

Bay Area Air Quality Management District

The BAAQMD attains and maintains air quality conditions in the SFBAAB through a comprehensive program of planning, regulation, enforcement, technical innovation, and promotion of the understanding of air quality issues. The BAAQMD has jurisdiction over an approximately 5,600-square-mile area of the San Francisco Bay Area.

The clean air strategy of the BAAQMD includes the preparation of plans for attainment of ambient air quality standards; adoption and enforcement of rules and regulations concerning sources of air pollution; and issuance of permits for stationary sources of air pollution. The BAAQMD also inspects stationary sources of air pollution and responds to citizen complaints, monitors ambient air quality and meteorological conditions, and implements programs and regulations required by the CAA and the CCAA.

With respect to applicable air quality plans, the BAAQMD prepared the 2010 Clean Air Plan (2010 CAP) to address nonattainment of the national 1- and 8-hour ozone standard in the SFBAAB. The purpose of the 2010 CAP is to:

- update the Bay Area 2005 Ozone Strategy in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone;
- consider the impacts of ozone control measures on particulate matter, air toxics, and greenhouse gases (GHGs) in a single, integrated plan;
- review progress in improving air quality in recent years; and
- establish emission control measures to be adopted or implemented in the 2009–2012 timeframe.

To achieve the four core purposes of the 2010 CAP, the control strategies proposed are designed to:

- reduce emissions of ozone precursors, particulate matter, air toxics, and GHGs;
- continue progress toward attainment of state ozone standards;
- reduce transport of ozone precursors to neighboring air basins;
- protect public health by reducing population exposure to the most harmful air pollutants; and
- protect the climate.

The BAAQMD has regulated TACs since the 1980s. At the local level, air pollution control or management districts may adopt and enforce CARB's control measures. Under BAAQMD Regulation 2-1 (General Permit Requirements), Regulation 2-2 (New Source Review), and Regulation 2-5 (New Source Review), all nonexempt sources that possess the potential to emit

TACs are required to obtain permits from BAAQMD. Permits may be granted to these operations if they are constructed and operated in accordance with applicable regulations, including new source review standards and air toxics control measures. The BAAQMD limits emissions and public exposure to TACs through a number of programs. The BAAQMD prioritizes TAC-emitting stationary sources based on the quantity and toxicity of the TAC emissions and the proximity of the facilities to sensitive receptors. The following BAAQMD regulations are applicable to the LRCP.

Regulation 6, Rule 1 (Particulate Matter). This regulation restricts emissions of particulate matter darker than No. 1 on the Ringlemann Chart to less than 3 minutes in any 1 hour.

Regulation 7 (Odorous Substances). This regulation establishes general odor limitations on odorous substances and specific emission limitations on certain odorous compounds.

Regulation 8, Rule 3 (Architectural Coatings). This regulation limits the quantity of reactive organic gas (ROG) in architectural coatings supplied, sold, offered for sale, applied, solicited for application, or manufactured for use within the district.

Regulation 8, Rule 15 (Emulsified and Liquid Asphalts). This regulation limits emissions of VOCs caused by paving materials.

Regulation 9, Rule 8 (Stationary Internal Combustion Engines). This regulation limits emissions of NO_X and CO from stationary internal combustion engines of more than 50 horsepower.

Metropolitan Transportation Commission/Association of Bay Area Governments

The Metropolitan Transportation Commission and Association of Bay Area Governments Executive Boards jointly approved Plan Bay Area, which includes the region's Sustainable Communities Strategies (SCS) and 2040 Regional Transportation Plan. Plan Bay Area is an integrated long-range transportation and land use/housing plan that supports a growing economy, provides more housing and transportation choices, and reduces transportation-related pollution in the San Francisco Bay Area. With the region's population expected to grow from approximately 7 million in 2011 to approximately 9 million in 2040, Plan Bay Area concluded that it is critical to make transportation, housing, and land use decisions now to sustain the Bay Area's quality of life.

Local

City and County of San Francisco

As a state entity, UC Hastings is not subject to City and County of San Francisco jurisdiction. Local air quality regulations and ordinances are provided herein for informational purposes.

The San Francisco General Plan includes an Air Quality Element. Relevant objectives of the element include:

Objective 1: Adhere to state and federal standards and regional programs.

Objective 2: Reduce mobile sources of air pollution through implementation of the Transportation Element of the San Francisco General Plan.

Objective 3: Decrease the air quality impacts of development by coordination of land use and transportation decisions.

Objective 4: Improve air quality by increasing public awareness regarding the negative health effects of pollutants generated by stationary and mobile sources.

Objective 5: Minimize particulate matter emissions from road and construction sites.

Objective 6: Link the positive effects of energy conservation and waste management to emission reductions.

The San Francisco Health Code Clean Construction Ordinance requires clean construction practices for all projects that entail 20 or more cumulative days of construction. The Clean Construction Ordinance requires that off-road equipment and off-road engines with 25 horsepower or greater be fueled by higher-grade biodiesel fuel and, if used more than 20 hours, either meet or exceed federal Tier 2 emissions standards for off-road engines or operate with the most effective verified diesel emission control technology. The requirement does not apply to portable or stationary generators (engines).

The San Francisco Health Code Article 22B and San Francisco Building Code Section 106.A.3.2.6, collectively constitute the Construction Dust Control Ordinance. The Construction Dust Control Ordinance requires that site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures, whether or not the activity requires a permit from the Department of Building Inspection (DBI). For projects over 0.5 acre, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health (DPH) prior to issuance of a building permit by the DBI. Building permits are not issued without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan, unless the director waives the requirement. The Construction Dust Control Ordinance requires project sponsors and contractors responsible for construction activities to control construction dust on the site or implement other practices that result in equivalent dust control that are acceptable to the Director of Public Health. Dust suppression activities may include watering of all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used, if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code.

San Francisco adopted Article 38 of the San Francisco Health Code in 2008, requiring an air quality assessment for new residential projects of 10 or more units located in proximity to high-traffic roadways, as mapped by the DPH, to determine whether residents would be exposed to unhealthful levels of $PM_{2.5}$. The air quality assessment evaluates the concentration of $PM_{2.5}$ from local roadway traffic that could affect a proposed residential development site. If the air quality assessment indicates that the annual average concentration of $PM_{2.5}$ at the site would be greater than 0.2 $\mu g/m^3$, Health Code Section 3807 requires development on the site to be designed or relocated to avoid exposure greater than 0.2 $\mu g/m^3$, or a ventilation system to be installed that would be capable of removing 80 percent of ambient $PM_{2.5}$ from habitable areas of the residential units.

4.2.2 Impacts and Mitigation

Significance Criteria

A significant air quality impact would occur if:

- the project would conflict with or obstruct implementation of the applicable air quality plan;
- the project would violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- the project would result in a cumulatively considerable net increase of any criteria air pollutant for which the region is in nonattainment under an applicable federal or state ambient air quality standard;
- the project would expose sensitive receptors to substantial pollutant concentrations; and/or
- the project would result in a cumulative air quality impact in combination with past, present and reasonably foreseeable future projects in the vicinity.

Because of the BAAQMD's regional regulatory role, the significance criteria and analysis methodologies in the BAAQMD CEQA Handbook are used in evaluating project impacts.[10] Development under the LRCP would result in a significant impact if any of the thresholds in Table 4.2-4, BAAQMD Significance Thresholds, were exceeded.

[10] Bay Area Air Quality Management District. May 2010. *California Environmental Quality Act Air Quality Guidelines*.

Table 4.2-4: BAAQMD Significance Thresholds

Analysis	Construction	Operation
Criteria Pollutants	ROG: 54 pounds per day NO_X: 54 pounds per day PM_{10}: 82 pounds per day (exhaust only) $PM_{2.5}$: 54 pounds per day (exhaust only) Dust: Failure to implement BMPs	ROG: 54 pounds per day, 10 tons per year NO_X: 54 pounds per day, 10 tons per year PM_{10}: 82 pounds per day, 15 tons per year (exhaust only) $PM_{2.5}$: 54 pounds per day, 10 tons per year CO: Violation of a CAAQS
Toxic Air Contaminants (Individual Project)	Increased cancer risk: 10 in 1 million Increased non-cancer hazard (HI): >1 Exhaust $PM_{2.5}$: >0.3 µg/m3	Same as construction
Toxic Air Contaminants (Cumulative Thresholds)	Increased cancer risk: 100 in 1 million Increased non-cancer hazard (HI): >10 Exhaust $PM_{2.5}$: >0.8 µg/m3	Same as construction
Odors	-	Five complaints per year averaged over 3 years

Notes: ROG= reactive organic gas, NO_X= nitrogen oxides, PM_{10}= respirable particulate matter, $PM_{2.5}$= fine particulate matter, CO=carbon monoxide, CAAQS= California Ambient Air Quality Standards, HI= hazard index
Source: Bay Area Air Quality Management District. May 2010. *California Environmental Quality Act Air Quality Guidelines*.

Methodology

Criteria Pollutants

The impact analysis in this section describes the air quality impacts from development under the LRCP. Air quality impacts fall into two categories—short term due to construction and long term due to project operation. The approach to the analysis of construction-related impacts is described in the following paragraphs.

Construction emissions were estimated using California Emissions Estimator Model (CalEEMod), 2013, version 2013.2.2. CalEEMod quantifies criteria pollutant emissions from construction from a variety of land use projects. Detailed information regarding the project and its variants was not available at the time of the analysis. CalEEMod default assumptions were used based on the size of development and the planned number of units.

Construction design/build delivery of the academic facility at 333 Golden Gate Avenue is projected to start in 2017, and to continue for approximately 24 months. It is assumed that construction of 198 McAllister Street and 50 Hyde Street would overlap with each other, and would begin after construction at 333 Golden Gate Avenue. It is anticipated that 100 McAllister Avenue would be the last part of the LRCP, and would not overlap with other construction activities.

Health Risk and Toxic Air Contaminants

Exposure to construction-related DPM was assessed by predicting the health risks in terms of excess cancer, non-cancer hazard impacts, and elevated $PM_{2.5}$ concentrations. The EPA's CAL3QHCR dispersion model was used to predict DPM and $PM_{2.5}$ hourly concentrations at sensitive land uses, based on daily PM_{10} and $PM_{2.5}$ exhaust mass emissions, with exhaust emissions of PM_{10} used as a surrogate for DPM. Estimates of project-level cancer risk, non-cancer hazard index (HI), and annual $PM_{2.5}$ concentrations were based on annual concentrations from CAL3QHCR, and anticipated construction durations.

Carbon Monoxide Hot Spot Analysis

To demonstrate conformity, a project must not cause or contribute to new localized CO violations or increase the frequency or severity of existing CO violations. According to the BAAQMD, air quality monitors have not recorded an air exceedance of the federal CO standards since at least 1994. Carbon monoxide concentrations throughout the state have steadily declined over time, as vehicle engines have become more efficient and less polluting. The BAAQMD has recognized this trend and completed technical analyses that indicate that there is no potential for a CO hot spot to occur when either of the following is true:

- Project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway). The fact that the LCRP would include development within a highly developed urban area with multi-story buildings that contains streets with canyon-like air dispersion characteristics means that this criterion may be applied to certain blocks along the Geary corridor and some of its parallel streets.

The previously described criteria have been used to assess project impacts with regard to an increase in localized CO concentrations.

Impacts

Impact AQ-1 Development under the LRCP would not conflict with or obstruct implementation of the 2010 Clean Air Plan. ***Less-than-Significant Impact***

The most recently adopted air quality plan is the 2010 CAP. The CAP is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state O_3 standards as expeditiously as practicable, and how the region will reduce the transport of O_3 and O_3 precursors to neighboring air basins. In determining consistency with the CAP, this analysis considers whether the project would: (1) support the primary goals of the CAP, (2) include applicable control measures from the CAP, and (3) avoid disrupting or hindering implementation of control measures identified in the CAP.

The primary goals of the CAP are to: (1) reduce emissions of ozone precursors, particulate matter, air toxics, and GHGs, (2) continue progress toward attainment of state ozone standards, (3) reduce transport of ozone precursors to neighboring air basins, (4) protect public health by reducing population exposure to the most harmful air pollutants, and (5) protect the climate. To meet the primary goals, the CAP recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The CAP recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and GHGs from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the CAP includes 55 control measures aimed at reducing air pollution.

333 Golden Gate Avenue Construction

The measures applicable to development under the LRCP are transportation control measures and energy and climate control measures. Impacts with respect to GHGs are discussed in Section 4.5, Greenhouse Gas Emissions, which demonstrates that construction and operation of the new academic building at 333 Golden Gate Avenue would not result in a significant GHG or climate change impact.

The new academic building at 333 Golden Gate Avenue would replace academic and administrative space at 198 McAllister Street, and would not generate net new travel demand at UC Hastings. In addition, the high availability of viable public transportation options and the location of the academic building near campus housing would ensure that students and staff could bicycle, walk, and ride transit to and from 333 Golden Gate Avenue. There would be minimal potential for increased pollutant emissions. Examples of a project that could cause the disruption or delay of CAP control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. Development of 333 Golden Gate Avenue would not preclude the extension of a transit line or a bike path or any other transit improvement. Therefore, the 333 Golden Gate Avenue development would result in a less-than-significant impact related to consistency with the CAP.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

The high availability of viable public transportation, non-auto transportation options, and the location of the academic building near campus housing would ensure that students and staff could bicycle, walk, and ride transit to and from Variant A, instead of conducting trips via private automobile. These features would avoid substantial growth in automobile trips and vehicle miles traveled. Variant A's anticipated 246 net new daily vehicle trips would result in a negligible increase in air pollutant emissions. Therefore, the development of Variant A under the LRCP would not interfere with control measures identified in the CAP. As with 333 Golden Gate Avenue, Variant A would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus, would not disrupt or hinder implementation of control measures identified in the CAP. Therefore, Variant A would result in a less-than-significant impact related to consistency with the CAP.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

The high availability of viable transportation options and the location of the academic building near campus housing would ensure that students and staff could bicycle, walk, and ride transit to and from Variant B, instead of taking trips via private automobile. These features ensure the avoidance of substantial growth in automobile trips and vehicle miles traveled. Variant B's anticipated 305 net new daily vehicle trips would result in a negligible increase in air pollutant emissions. Therefore, the development of Variant B under the LRCP would not interfere with control measures identified in the CAP. As with 333 Golden Gate Avenue, Variant B would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus, would not disrupt or hinder implementation of control measures identified in the CAP. Therefore, Variant B would result in a less-than-significant impact related to consistency with the CAP.

100 McAllister Street Renovation

Renovation of 100 McAllister Street to include additional residential units would lead to a decrease in daily external vehicle trips. More students would walk to campus instead of driving, which would decrease pollutant emissions. The renovation of 100 McAllister Street as part of the LRCP would have minimal potential to interfere with the CAP.

Impact AQ-2 Development under the LRCP could violate an air quality standard or contribute substantially to an existing or projected air quality violation. *Less than Significant with Mitigation*

Construction

Construction activities would result in emissions of O_3 precursors and particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of O_3 precursors and particulate matter are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. Construction phases would include demolition, site preparation, placement of infrastructure, placement of foundations for structures, and fabrication of structures. Demolition and construction activities would require the use of heavy trucks, material loaders, cranes, dozers, and other mobile and stationary construction equipment.

333 Golden Gate Avenue Construction

Fugitive Dust

Construction activities—including demolition, excavation, grading, etc.—may cause wind-blown dust that could contribute particulate matter to the local atmosphere. Dust can be an irritant, causing watering eyes or irritation to the lungs, nose, and throat. Depending on exposure, adverse health effects can occur due to this particulate matter in general, as well as due to specific contaminants, such as Pb or asbestos, that may be constituents of dust.

The BAAQMD does not have quantitative thresholds for fugitive dust. Instead, the threshold is based on compliance with best management practices (BMPs). Unmitigated fugitive dust could significantly affect local and regional PM_{10} levels, which would result in health impairment due to the inhalation of dust. Mitigation Measure (MM)-AQ-1 would require compliance with BAAQMD BMPs. Therefore, with implementation of MM-AQ-1, Fugitive Dust, construction of 333 Golden Gate Avenue would result in a less-than-significant impact related to fugitive dust emissions.

MM-AQ-1: Fugitive Dust

The construction contractor shall implement the following specific construction mitigation measures to reduce fugitive dust. Emission reduction measures shall include, at a minimum, the following measures. Alternative measures may be identified by the construction contractor, as appropriate, provided that they are as effective as the following measures. Alternative measures shall be submitted to UC Hastings for approval.

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.

- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD phone number will also be visible to ensure compliance with applicable regulations.

Criteria Air Pollutants

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the project site. Fugitive dust emissions would primarily result from demolition and site preparation (e.g., grading) activities. NO_X emissions would primarily result from the use of construction equipment. During the finishing phase, the application of architectural coatings (e.g., paints) and other building materials would release VOCs. The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Construction emissions were estimated using CalEEMod default assumptions based on the size of development. The construction emissions are shown in Table 4.2-5, Regional Construction Emissions - 333 Golden Gate Avenue. Emissions would not exceed the BAAQMD regional significance thresholds. Therefore, development of 333 Golden Gate Avenue would result in a less-than significant impact related to construction emissions.

Table 4.2-5: Regional Construction Emissions - 333 Golden Gate Avenue

	Average Daily Emissions			
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Average Emissions	3	10	1	1
Regional Significance Threshold	**54**	**54**	**82**	**54**
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes: ROG= reactive organic gas, NO_X= nitrogen oxides, PM_{10}= respirable particulate matter, $PM_{2.5}$= fine particulate matter
Source: CalEEMod version 2013.2.2 and Terry A. Hayes Associates Inc., 2015.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Fugitive Dust

Construction activities associated with Variant A would incorporate MM-AQ-1 and the associated fugitive dust BMPs discussed previously for 333 Golden Gate Avenue. Therefore, Variant A would result in a less-than-significant impact related to fugitive dust.

Criteria Air Pollutants

As with 333 Golden Gate Avenue, Variant A construction emissions were estimated using CalEEMod default assumptions based on the size of development. The construction emissions are shown in Table 4.2-6, Regional Construction Emissions - Variant A. Emissions would not exceed the BAAQMD regional significance thresholds. Therefore, Variant A would result in a less-than-significant impact related to construction emissions.

Table 4.2-6: Regional Construction Emissions - Variant A

Project Location	**Average Daily Emissions**			
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
50 Hyde Street[1]	4	9	1	1
198 McAllister Street[1]	7	11	1	1
Maximum Average Daily Emissions	**11**	**20**	**2**	**2**
Regional Significance Threshold	**54**	**54**	**82**	**54**
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes: ROG= reactive organic gas, NO_X= nitrogen oxides, PM10= respirable particulate matter, PM2.5= fine particulate matter
[1] Construction of 198 McAllister Street and 50 Hyde Avenue renovation may overlap.
Source: CalEEMod version 2013.2.2 and Terry A. Hayes Associates Inc., 2015.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

Fugitive Dust

Construction activities associated with Variant B would incorporate MM-AQ-1 and the associated fugitive dust BMPs discussed previously for 333 Golden Gate Avenue. Therefore, Variant B would result in a less-than-significant impact related to fugitive dust.

Criteria Air Pollutants

As with 333 Golden Gate Avenue, construction emissions were estimated using CalEEMod default assumptions based on the size of development. The construction emissions are shown in Table 4.2-7, Regional Construction Emissions – Variant B. Emissions would not exceed the BAAQMD regional significance thresholds. Therefore, Variant B would result in a less-than-significant impact related to construction emissions.

Table 4.2-7: Regional Construction Emissions – Variant B

Project Location	Average Daily Emissions			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
50 Hyde Street and 198 McAllister Street	11	12	1	1
Regional Significance Threshold	**54**	**54**	**82**	**54**
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes: ROG= reactive organic gas, NO_X= nitrogen oxides, PM_{10}= respirable particulate matter, $PM_{2.5}$= fine particulate matter
/a/ Construction of 198 McAllister Street and 50 Hyde Avenue would overlap.
Source: CalEEMod version 2013.2.2 and Terry A. Hayes Associates Inc., 2015.

100 McAllister Street Renovation

Fugitive Dust

Construction activity associated with 100 McAllister Street renovation would incorporate MM-AQ-1 and the associated fugitive dust BMPs discussed previously for 333 Golden Gate Avenue. Therefore, the renovation of 100 McAllister Street would result in a less-than-significant impact related to fugitive dust.

Criteria Air Pollutants

As with 333 Golden Gate Avenue, construction emissions were estimated using CalEEMod default assumptions based on the size of development. The construction emissions are shown in Table 4.2-8, Regional Construction Emissions - 100 McAllister Street. Emissions would not exceed the BAAQMD regional significance thresholds. Therefore, renovation of 100 McAllister Street would result in a less-than-significant impact related to construction emissions.

Table 4.2-8: Regional Construction Emissions - 100 McAllister Street

Project Location	Average Daily Emissions			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
100 McAllister Street	1	3	<1	<1
Regional Significance Threshold	**54**	**54**	**82**	**54**
Exceed Threshold?	**No**	**No**	**No**	**No**

Notes: ROG= reactive organic gas, NO_X= nitrogen oxides, PM_{10}= PM_{10}= respirable particulate matter, $PM_{2.5}$= fine particulate matter
Source: CalEEMod version 2013.2.2 and Terry A. Hayes Associates Inc., 2015.

Operation

Operational emissions associated with the LRCP would include additional mobile source emissions from additional vehicle trips and area source emissions from new development (e.g., consumer products), electricity and natural gas consumption, and waste pickup.

333 Golden Gate Avenue Construction

The new academic building at 333 Golden Gate Avenue would replace all academic programming and faculty offices currently in Snodgrass Hall at 198 McAllister Street. Snodgrass Hall would remain vacant until implementation of Variant A or Variant B, analyzed in detail in the following paragraphs. The development of 333 Golden Gate Avenue would not result in additional staff or students, and there would be no potential for increased mobile source emissions. The new building would be approximately 19,000 square feet smaller than Snodgrass Hall, and would be constructed to meet current Title 24 energy efficiency standards. There would be no potential for increased pollutant emissions related to energy use or other area sources (e.g., consumer products). Therefore, 333 Golden Gate Avenue would result in a less-than-significant impact related to operational emissions.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Operational emissions were estimated using CalEEMod, traffic data, and the size of development. The operational emissions are shown in Table 4.2-9, Regional Operational Emissions - Variant A. Emissions would not exceed the BAAQMD regional significance thresholds. Therefore, Variant A would result in a less-than-significant impact related to operational emissions.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

Operational emissions were estimated using CalEEMod, traffic data, and the size of development. The operational emissions are shown in Table 4.2-10, Regional Operational Emissions - Variant B. Emissions would not exceed the BAAQMD regional significance thresholds. Therefore, Variant B would result in a less-than-significant impact related to operational emissions.

100 McAllister Street Renovation

Renovating 100 McAllister Street to include additional residential units would lead to a decrease in daily external vehicle trips. More students would walk to campus instead of driving, which would decrease pollutant emissions. Renovation of 100 McAllister Street would have minimal potential to generate additional emissions.

Table 4.2-9: Regional Operational Emissions - Variant A

Daily Emissions (pounds per day)				
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Existing Land Uses				
Mobile Sources	2	5	4	<1
Energy Sources	<1	4	<1	<1
Area Sources	20	<1	<1	<1
Subtotal	22	9	4	<1
Variant A				
Mobile Sources	2	4	4	1
Energy Sources	<1	4	<1	<1
Area Sources	24	1	<1	<1
Subtotal	26	9	4	1
Net Emissions	4	<1	<1	<1
Regional Significance Threshold	54	54	82	54
Exceed Threshold?	No	No	No	No
Annual Emissions (tons per year)				
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Existing Land Uses				
Mobile Sources	<1	1	<1	<1
Energy Sources	<1	<1	<1	<1
Area Sources	4	<1	<1	<1
Subtotal	4	1	<1	<1
Variant A				
Mobile Sources	<1	<1	<1	<1
Energy Sources	<1	1	<1	<1
Area Sources	4	<1	<1	<1
Subtotal	4	1	<1	<1
Net Emissions	<1	<1	<1	<1
Regional Significance Threshold	10	10	15	10
Exceed Threshold?	No	No	No	No

Notes: ROG= reactive organic gas, NO_X= nitrogen oxides, PM_{10}= respirable particulate matter, $PM_{2.5}$= fine particulate matter
Source: CalEEMod version 2013.2.2 and Terry A. Hayes Associates Inc., 2015.

Table 4.2-10: Regional Operational Emissions - Variant B

Daily Emissions (pounds per day)				
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Existing Land Uses				
Mobile Sources	2	5	4	<1
Energy Sources	<1	4	<1	<1
Area Sources	20	<1	<1	<1
Subtotal	14	8	<1	<1
Variant B				
Mobile Sources	2	4	5	1
Energy Sources	<1	4	<1	<1
Area Sources	27	1	<1	<1
Subtotal	29	9	5	1
Net Emissions	15	1	<1	<1
Regional Significance Threshold	54	54	82	54
Exceed Threshold?	No	No	No	No
Annual Emissions (tons per year)				
	ROG	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Existing Land Uses				
Mobile Sources	<1	1	<1	<1
Energy Sources	<1	<1	<1	<1
Area Sources	4	<1	<1	<1
Subtotal	4	1	<1	<1
Variant B				
Mobile Sources	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1
Area Sources	5	<1	<1	<1
Subtotal	5	1	<1	<1
Net Emissions	1	<1	<1	<1
Regional Significance Threshold	10	10	15	10
Exceed Threshold?	No	No	No	No

ROG= reactive organic gas, NO_X= nitrogen oxides, PM_{10}= respirable particulate matter, $PM_{2.5}$= fine particulate matter
Source: CalEEMod version 2013.2.2 and Terry A. Hayes Associates Inc., 2015.

Impact AQ-3 The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors). ***Less-than-Significant Impact***

333 Golden Gate Avenue Construction

Regional air pollution is, by its very nature, largely a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts. The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because construction- and operation-related regional emissions would not exceed the project-level thresholds for criteria air pollutants (see the discussion for Impact AQ-2), development of 333 Golden Gate Avenue would not result in a cumulatively considerable contribution to regional criteria pollutant emissions.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

As with 333 Golden Gate Avenue, construction- and operation-related regional emissions for Variant A would not exceed the project-level thresholds for criteria air pollutants (see the discussion for Impact AQ-2). Therefore, Variant A would not result in a cumulatively considerable contribution to regional criteria pollutant emissions.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

As with 333 Golden Gate Avenue, construction- and operation-related regional emissions for Variant B would not exceed the project-level thresholds for criteria air pollutants (see the discussion for Impact AQ-2). Therefore, Variant B would not result in a cumulatively considerable contribution to regional criteria pollutant emissions.

100 McAllister Street Renovation

As with the analysis for 333 Golden Gate Avenue, construction- and operation-related regional emissions would not exceed the project-level thresholds for criteria air pollutants (see the discussion for Impact AQ-2). Therefore, renovation of 100 McAllister Street would not result in a cumulatively considerable contribution to regional criteria pollutant emissions.

Impact AQ-4 The project could expose sensitive receptors to substantial pollutant concentrations. ***Less than Significant with Mitigation***

The following analysis assesses construction-related toxic air contaminants and the potential for CO hot spots. The LRCP would not be a new operational source of toxic air contaminants.

Health Risk Assessment

The UC Hastings campus is within the Air Pollutant Exposure Zone, meaning that, currently, excess cancer risk from all known sources is above 100 per 1 million, and annual average $PM_{2.5}$ concentrations (ambient concentrations and concentrations from all known sources) are above 10 $\mu g/m^3$. The zone of influence is defined as a 1,000-foot radius from property lines of the UC Hastings campus. According to the Citywide air pollution model, the maximum existing excess cancer risk, acute and chronic health indices, and annual $PM_{2.5}$ concentrations for locations within 1,000 feet of the alignment are provided in the following analysis.

Regarding cumulative health risks related to construction activities, BAAQMD guidance states that construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source DPM emissions are typically reduced by 70 percent at a distance of approximately 500 feet. In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk.

Project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, dispersion modeling was completed to assess construction-related health risks based on available guidance.

333 Golden Gate Avenue Construction

The primary construction emissions of concern, DPM and $PM_{2.5}$, would be emitted by diesel-powered construction equipment and trucks hauling excavated materials. The results of the risk assessment for off-site maximally exposed receptors are presented in Table 4.2-11, Construction Health Risk Assessment for 333 Golden Gate Avenue. The annual increase in $PM_{2.5}$ concentrations would exceed the BAAQMD significance thresholds. MM-AQ-2 would require Tier IV exhaust controls, and would reduce $PM_{2.5}$ concentrations to below the threshold. Therefore, with implementation of MM-AQ-2, Construction Equipment Requirements, 333 Golden Gate Avenue would result in less-than-significant impacts related to construction health risk.

Table 4.2-11: Construction Health Risk Assessment for 333 Golden Gate Avenue

Risk	Unit	Threshold	Unmitigated Risk	Mitigated Risk
Excess Cancer Risk	Probability per 1 Million Population	10	3	0.1
Chronic Health Risk	Health Index	1.0	0.11	<0.01
Acute Health Risk	Health Index	1.0	0.34	0.23
Increase in $PM_{2.5}$ Concentration	Average Annual (μg/m³)	0.3	0.51	0.02

Notes: $PM_{2.5}$= fine particulate matter
Source: Terry A. Hayes Associates Inc., 2015.

MM-AQ-2: Construction Equipment Requirements

The construction contractor shall ensure that equipment of construction activity meets Tier IV emissions standards established by the US Environmental Protection Agency (EPA).

Variants A and B

Variants A and B were assessed together because there would be little difference in total exhaust emissions between the two variants. The risk estimates account for all project components, including 333 Golden Gate Avenue and 100 McAllister Street. The results of the risk assessment for off-site maximally exposed receptors are presented in Table 4.2-12, Construction Health Risk Assessment for Variants A and B. The annual increase in $PM_{2.5}$ concentrations would exceed the BAAQMD significance thresholds. MM-AQ-2 would require Tier IV exhaust controls, and would reduce $PM_{2.5}$ concentrations to below the threshold. Therefore, with implementation of MM-AQ-2, Variants A and B would result in less-than-significant impacts related to construction health risk.

Table 4.2-12: Construction Health Risk Assessment for Variants A and B

Risk	Unit	Threshold	Unmitigated Risk	Mitigated Risk
Excess Cancer Risk	Probability per 1 Million Population	10	9	0.3
Chronic Health Risk	Health Index	1.0	0.25	0.01
Acute Health Risk	Health Index	1.0	0.96	0.896
Increase in $PM_{2.5}$ Concentration	Average Annual (μg/m³)	0.3	1.22	0.04

Notes: $PM_{2.5}$= fine particulate matter
Source: Terry A. Hayes Associates Inc., 2015.

100 McAllister Street Renovation

The primary construction emissions of concern, DPM and $PM_{2.5}$, would be emitted by diesel-powered construction equipment and trucks hauling excavated materials. The results of the risk assessment for off-site maximally exposed receptors are presented in Table 4.2-13, Construction Phase Health Risk Assessment for 100 McAllister Street Renovations - Unmitigated. The health risks would be less than the BAAQMD significance thresholds. Therefore, 100 McAllister Street would result in less-than-significant impacts related to construction health risk.

Table 4.2-13: Construction Phase Health Risk Assessment for 100 McAllister Street Renovations - Unmitigated

Risk	Unit	Threshold	Unmitigated Risk
Excess Cancer Risk	Probability per 1 Million Population	10	3
Chronic Health Risk	Health Index	1.0	0.19
Acute Health Risk	Health Index	1.0	0.20
Increase in $PM_{2.5}$ concentration	Average Annual (μg/m^3)	0.3	0.05
Notes: $PM_{2.5}$= particulate matter 2.5 microns or less in diameter Source: Terry A. Hayes Associates Inc., 2015.			

Carbon Monoxide Hot Spots

333 Golden Gate Avenue Construction

The new academic building at 333 Golden Gate Avenue would replace all academic programming and faculty offices currently at 198 McAllister Street, which would remain vacant until implementation of Variant A or Variant B, analyzed in detail in the following paragraphs. The development of 333 Golden Gate Avenue would not result in additional staff or students, and there would be minimal potential for increased mobile source emissions and associated CO hot spots. Therefore, development of 333 Golden Gate Avenue would result in a less-than-significant impact related to CO hot spots.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

As previously described, the BAAQMD has provided criteria that have been used to assess project impacts with regard to an increase in localized CO concentrations. The 31 additional peak-hour vehicle trips associated with Variant A would not increase traffic volumes at any intersection in the traffic study area to more than 24,000 vehicles per hour. Minimal potential exists for a new localized CO hot spot, or the worsening of an existing CO hot spot. Therefore, Variant A would result in a less-than-significant impact related to CO hot spots.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

The 41 additional peak-hour vehicle trips associated with Variant B would not increase traffic volumes at any intersection in the traffic study area to more than 24,000 vehicles per hour. Minimal potential exists for a new localized CO hot spot, or the worsening of an existing CO hot spot. Therefore, Variant B would result in a less-than-significant impact related to CO hot spots.

100 McAllister Street Renovation

According to the traffic analysis, renovating 100 McAllister Street to include additional residential units would lead to a decrease in daily external vehicle trips. More students would walk to campus instead of driving, which would decrease pollutant emissions. Therefore, renovating 100 McAllister Street has minimal potential to cause a new or worsening of an existing CO hot spot.

Impact AQ-5 The project would not create objectionable odors affecting a substantial number of people. ***Less-than-Significant Impact***

333 Golden Gate Avenue Construction

Equipment exhaust is a potential source of odors during construction activities. Odors from this source would be localized and generally confined to the immediate area surrounding the project site. Development under the LRCP would use typical construction techniques, and the odors would be temporary in nature and typical of most construction sites. Regarding operational activities, land uses associated with odor complaints typically include wastewater treatment plants, landfills, confined animal facilities, composting stations, food manufacturing plants, refineries, and chemical plants. Operation of 333 Golden Gate Avenue would not include such sources of odors. Therefore, 333 Golden Gate Avenue would result in a less-than-significant impact related to odors.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Construction- and operation-related odors associated with Variant A would be similar to those discussed previously for 333 Golden Gate Avenue. Therefore, Variant A would result in a less-than-significant impact related to odors.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

Construction- and operation-related odors associated with Variant B would be similar to those discussed previously for 333 Golden Gate Avenue. Therefore, Variant B would result in a less-than-significant impact related to odors.

100 McAllister Street Renovation

Construction- and operation-related odors associated with renovating 100 McAllister Street would be similar to those discussed previously for 333 Golden Gate Avenue. Therefore, renovation of 100 McAllister Street would result in a less-than-significant impact related to odors.

4.2.3 Cumulative Impacts

Criteria Pollutants

Cumulative criteria pollutant emissions are assessed in Impact AQ-3. Because construction- and operation-related regional emissions would not exceed the project-level thresholds for criteria air pollutants (Impact AQ-2), the LRCP would not result in a cumulatively considerable contribution to regional criteria pollutant emissions.

Health Risk and Toxic Air Contaminants

333 Golden Gate Avenue Construction

Based on the citywide air pollution model, the cumulative health risk at this location is approximately 8.99 $\mu g/m^3$ and 73 cancer risk in 1 million people exposed. As discussed previously, the maximum mitigated construction-related health risk would not exceed the project-level thresholds. Development of 333 Golden Gate Avenue would contribute 0.5 percent to the cumulative cancer risk and 0.4 percent to the cumulative annual $PM_{2.5}$ concentrations. Based on the project-level thresholds and the low percentage of total health risk, construction activities would not contribute considerably to existing health risks.

Variants A and B

Based on the citywide air pollution model, the cumulative health risk in this area is approximately 8.89 $\mu g/m^3$ and 64 cancer risk in 1 million people exposed. As discussed previously, the maximum mitigated construction-related health risk would not exceed the project-level thresholds. Variant A or B would contribute 0.5 percent to the cumulative cancer risk and 0.4 percent to the cumulative annual $PM_{2.5}$ concentrations. Based on the project-level thresholds and the low percentage of total health risk, construction activities would not contribute considerably to existing health risks.

100 McAllister Street Renovation

Based on the citywide air pollution model, the cumulative risk at this location is approximately 8.79 $\mu g/m^3$ and 54 cancer risk in 1 million people. As discussed previously, the maximum mitigated construction-related health risk would not exceed the project-level thresholds. Renovation of 100 McAllister Street would contribute 0.4 percent to the cumulative cancer risk and 0.6 percent to the cumulative annual $PM_{2.5}$ concentrations. Based on the project-level thresholds and the low percentage of total health risk, construction activities would not contribute considerably to existing health risks.

Development under the LRCP would not contribute considerably to cumulative criteria pollutants or health risk/toxic air contaminant impacts.

4.3 CULTURAL RESOURCES

This section discusses the historic architectural setting of downtown San Francisco, the San Francisco Civic Center, and the UC Hastings campus area, as well as historic registers and districts as they apply to the proposed LRCP. Finally, this section identifies significant historic/architectural impacts associated with the LRCP, and identifies mitigation measures to eliminate or reduce these impacts, if appropriate.

4.3.1 Setting

The UC Hasting College of the Law campus is in the Downtown/Civic Center neighborhood of San Francisco at the juncture of the Civic Center, Tenderloin, and Mid-Market districts. The campus occupies part of two city blocks bounded by McAllister, Larkin, and Leavenworth Streets and Golden Gate Avenue, and consists of the following six properties (see Figure 4.3-1, UC Hastings Campus):

- 100 McAllister Street: constructed in 1929 and acquired by the College in 1978; primarily serves as student housing.
- 198 McAllister Street (Snodgrass Hall/Original Building): the primary academic building constructed in 1953; houses lecture halls, seminar rooms, and offices.
- 50 Hyde Street (Annex): completed in 1969; houses four classrooms, the law center, moot court, reading room and multi-purpose hall.
- 200 McAllister (Kane Hall): constructed in 1980 and renovated in 2007; houses many of the campus' faculty and administrative offices, the main library, cafeteria, faculty lounge and meeting room, and various student support facilities.
- 376 Larkin Street: constructed in 2009; houses mixed-used retail and parking garage.
- 333 Golden Gate Avenue: the undeveloped lot between the parking garage and 200 McAllister Street. Currently in use as a recreational area and demonstration garden.[1]

The campus is near the three Civic Center historic districts to the south and west, and the Uptown Tenderloin Historic District to the north and east. 100 McAllister Street is within the boundaries of the Uptown Tenderloin Historic District.

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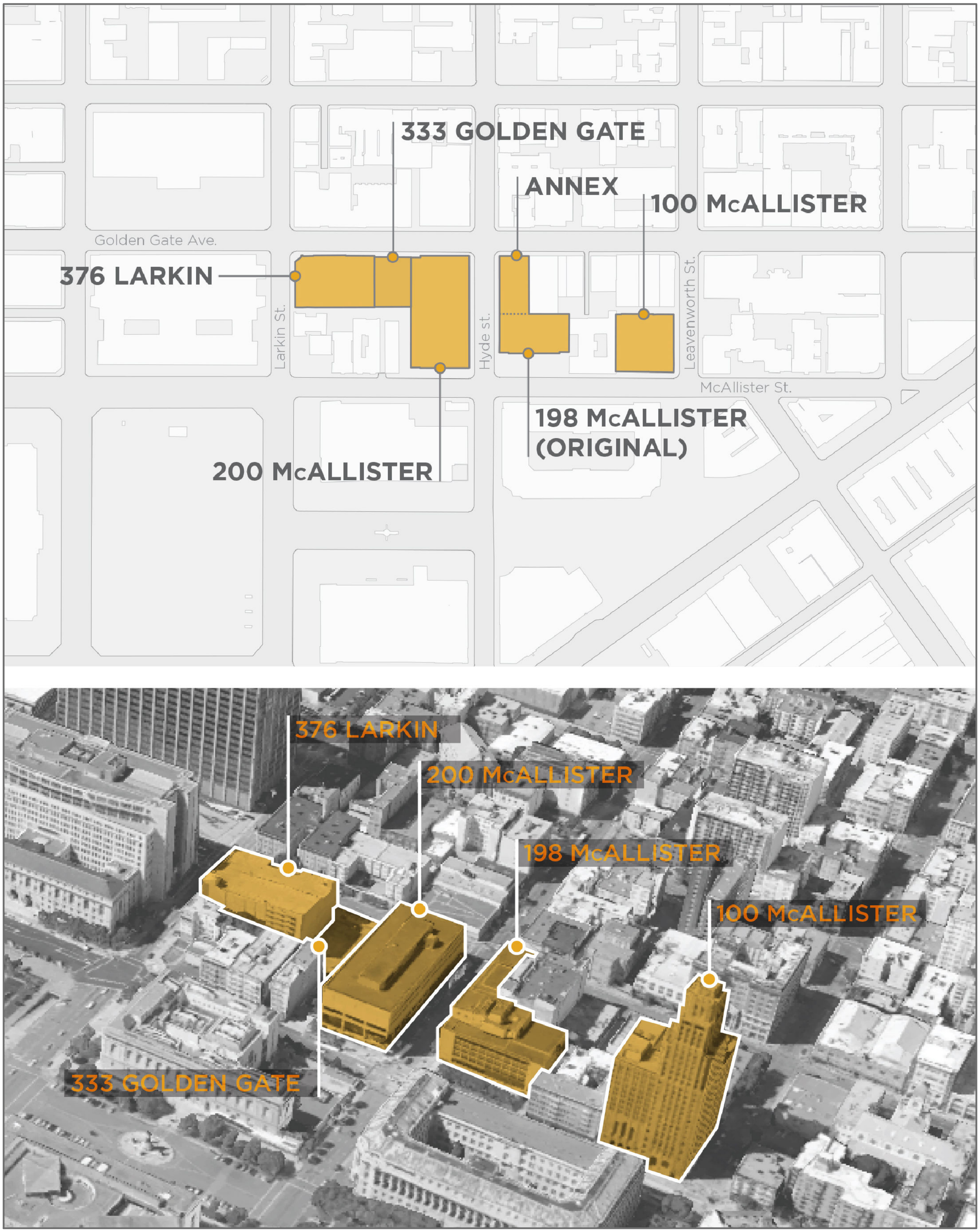
[1] UC Hastings College. 2015. *Five-Year Infrastructure Plan 2016-2021*, pages 3 and 10.



Source: UC Hastings. 2015. Five-Year Infrastructure Plan 2016-2021, page 40

FIGURE 4.3-1: UC HASTINGS CAMPUS

Historic Context

Downtown San Francisco

San Francisco experienced a series of booms during the 19th century, one during the Gold Rush of 1849 and another at the completion of the transcontinental railroad 20 years later. Most of the city was destroyed during the April 28, 1906, earthquake and fire.

The post-1906 reconstruction effort, like the two periods of 19th century development, occurred very rapidly. San Francisco was rebuilt along the same street grid and with the same use pattern as before the tragedy. This continued until the beginning of the Depression, resulting in an entire downtown of visually and conceptually similar buildings. This period also corresponded with the influential early Modern movement developing in Europe and focusing on the urban condition.

The construction of skyscrapers and large governmental buildings since the end of World War II has required the demolition of a number of early 20th century structures. Despite these changes, however, much of downtown San Francisco and the Civic Center area continue to display its early-20th century character.

San Francisco Civic Center

As early as 1870, the land on which the San Francisco Civic Center now stands was designated as a City Hall Reservation. The buildings of that era are no longer extant but the effort to make a cohesive civic center has remained constant. The San Francisco Civic Center as it stands today exemplifies the "City Beautiful" movement. The "City Beautiful" movement emphasized "formal plan and composition of monumental scale, neo-classical style buildings fronting plazas, boulevards, and grand public gathering spaces." This movement is most associated with the 1893 World's Colombian Exposition in Chicago. Many cities throughout the United States were inspired by the "City Beautiful" movement but only Cleveland and San Francisco managed to implement those plans. The original proposal is still the guideline for the Civic Center today.

The Civic Center is characterized by discrete monumental buildings organized around a central green plaza. The cohesiveness of the area stems from the color palette, scale, and decorative details that are repeated throughout Civic Center buildings. The circulation paths create large-scale view corridors between the monumental cultural and governmental landmarks. As a whole, the Civic Center is a direct link to a larger civic vision and is an important part of the identity of the City of San Francisco.

UC Hastings Campus

Hastings College of the Law was founded by Chief Justice Serranus Clinton Hastings in 1878 as the "law department" of the University of California. The modern history of UC Hastings began shortly after World War II when newly appointed Dean David Snodgrass began the practice of hiring recently retired eminent law professors to teach at UC Hastings and the College moved to its first permanent building at 198 McAllister Street in 1953. The central location of the building provided direct access to the legal and law-related institutions located at the Civic Center and emphasized the College's relationship with the City.[2]

UC Hastings grew rapidly and by 1965 the College's student body doubled due to California's population growth and pressures expanding the legal profession. Increased enrollment exceeded the existing facility and the College was authorized to build an addition to its existing facility. The Annex at 50 Hyde Street, which increased the physical plant by about 75 percent, was completed in 1969.[3]

UC Hastings continued to experience overcrowding in the early 1970s. The College purchased several residential and commercial buildings on the block bounded by Hyde, Golden Gate, Larkin, and McAllister streets, to provide for campus growth. A long-range development plan was also developed during this time, envisioning the construction of the Hastings Academic Building at 200 McAllister Street and a separate Legal Affairs Facility (abandoned in 1979 due to financial constraints). In 1978, the school acquired 100 McAllister Street, which provides student housing for approximately 25 percent of the student body. In 1980, the 200 McAllister Street building was opened, providing space for the library, faculty offices, and student services.[4]

UC Hastings owned several residential hotels; the College vacated the Eureka Hotel (361-365 Golden Gate Avenue) and Philadelphia Hotel (343-349 Golden Gate Avenue) in 1979 and relocated residents because the buildings were considered unsafe, seismically unsound for residential use, and in a condition of disrepair. The College renovated structures it then owned at 260 and 270 McAllister Street and offered residential rental units to former tenants of the hotels. The renovation of 270 McAllister Street provided 80 housing units and the renovations at 260 McAllister provided 10 additional units.[5]

The four structures at 333 to 365 Golden Gate Avenue were damaged during the 1989 Loma Prieta Earthquake and demolished in 1990. The site was used for surface parking (except for a brief period when it functioned as temporary classroom space with modular buildings in 1999) until the construction of the UC Hastings Parking Garage at 376 Larkin Street in 2009. In 1994-1995, UC Hastings sold 324 Larkin Street, and 250, 260, and 270 McAllister Street. The Tenderloin Neighborhood Development Corporation purchased and renovated the 250 and 260 McAllister Street buildings. In 1996, UC Hastings sold 277 Golden Gate Avenue (the KGO

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[2] UC Hastings. 2007. *Self-Study Report*, p. 5-6. UC Hastings. 1975. *Hastings College of the Law San Francisco Civic Center Campus Project Planning Guide, Alterations to the Existing Building, Reference Number 910760A*, page 3-4.

[3] Ibid.

[4] EIP Associates. 2006. *Hastings Parking Garage Project Draft SEIR*, page II-4.

[5] Ibid.

building), a property that had been given to the College in 1986 by the American Broadcasting Company. In 1998-1999, the 198 McAllister Street classroom building—since renamed Snodgrass Hall—was partially renovated. During 2005-2007, the 200 McAllister Street building, renamed Mary Kay Kane Hall, was substantially renovated, providing enhanced earthquake safety, improved systems, and an entirely redesigned library facility.[6] Figure 4.3-2, Historic Resources at UC Hastings and Vicinity, shows the districts and historic resources near UC Hastings.

Civic Center Historic Districts

UC Hastings is immediately north of three designated Civic Center historic districts that comprise an approximate 15-block area: the San Francisco Civic Center National Register Historic District (listed in 1978), San Francisco Civic Center National Historic Landmark District (designated in 1987), and city-designated Civic Center Historic District (listed in 1994). The Civic Center is also listed in the California Register of Historical Resources (CRHR). Both the coterminous National Register listing and National Historic Landmark designation comprise a smaller-area boundary than the coterminous California Register listing and the San Francisco Landmark District (refer to Figure 4.3-2).

The San Francisco Civic Center is a group of monumental buildings around a central open space, Civic Center Plaza, and additional buildings that extend the principal axis to the east and west. The San Francisco Civic Center, the scene of events of national and international importance, including the founding of the United Nations and the drafting and signing of the post-World War II peace treaties with Japan, outstandingly illustrates the era of turn-of-the-20th century municipal reform movements in the United States and early public and city planning. By general consensus, its architecture and plan are regarded as one of the finest and most complete manifestations of the "City Beautiful" movement in the United States.[7]

The Civic Center also embodies San Francisco's phoenix-like resurgence after the 1906 earthquake and fires. The Civic Center remains the permanent manifestation of this phenomenon; it shared its origins, however, with the Panama-Pacific International Exposition of 1915 that also represented the city's resurgence. Exposition Auditorium (now Bill Graham Civic Auditorium) in the Civic Center remains the only link between these two great projects and the only intact survivor of the Exposition, one of the most notable of America's World's Fairs.[8]

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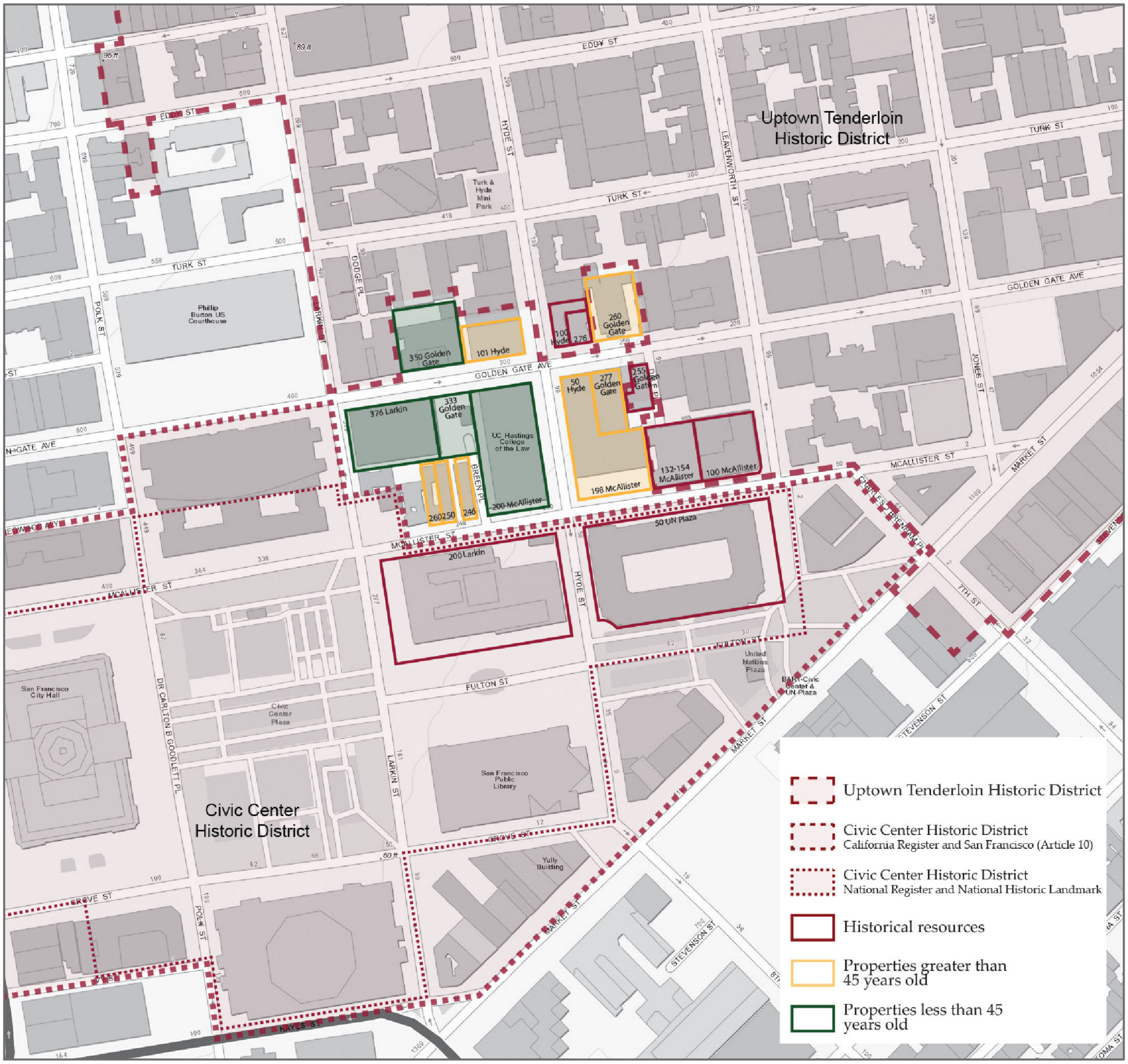
[6] EIP Associates. 2004. *Hastings College of the Law Institutional Master Plan,* p. 13-14. UC Hastings. 2007. *Self-Study Report,* pages 5-6.

[7] James E. Charleton. 1984. *National Register of Historic Places Registration Form – San Francisco Civic Center*. MIG, Inc. 2015. *San Francisco Civic Center Historic District Cultural Landscape Inventory,* Section 8.

[8] Ibid.



Source: Edited from San Francisco Property Information Map.
Online: http://propertymap.sfplanning.org/?dept=planning.
Site visited on January 4, 2016

FIGURE 4.3-2: HISTORIC RESOURCES AT UC HASTINGS AND VICINITY

The historic Civic Center buildings are unified in the Beaux-Arts classical design. The buildings are organized with horizontal bands of vertically proportioned elements, with the grand order of the facade displayed on two or three floors above a usually rusticated base of one or two ground and partially sub-ground floors. The Civic Center Historic District contains standard features such as overall form, massing, scale, proportion, orientation, depth of face, fenestration and ornamentation, materials, color, texture, architectural detailing, façade line continuity, decorative and sculptural features, street furniture, granite curbing, and grille work.[9]

Uptown Tenderloin National Register Historic District[10]

The Uptown Tenderloin Historic District is at the center of the Downtown/Civic Center neighborhood and is bounded roughly by Mason and Taylor Streets to the east, Geary Street to the north, Larkin Street to the west, and Golden Gate Avenue and McAllister Street to the south (refer to Figure 4.3-2). The district was listed in the National Register of Historic Places (NRHP) in 2009.

The Uptown Tenderloin Historic District is significant at the local level for the period 1906-1957 and retains a high degree of integrity. The district contributors are predominantly hotels and apartments but also include non-residential building types associated with life in the neighborhood. The district is significant under:

- Criterion A (Events) in the area of Social History for its association with the development of hotel and apartment life in San Francisco during a critical period of change. As a distinctive residential area it is also associated with commercial activity, entertainment, and vice.
- Criterion C (Design/Construction) in the area of Architecture for its distinctive mix of building types that served a new urban population of office and retail workers.

The district comprises 18 whole and 15 partial city blocks and 477 buildings and sites, 409 of which are contributing resources to the district. The district is formed around its predominant building type: three- to seven-story, multi-unit apartments, hotels, or apartment-hotels, constructed of brick or reinforced concrete. On the exteriors, sometimes only signage clearly distinguishes between these related building types. Because virtually the entire district was constructed in the quarter-century between 1906 and the early 1930s, a limited number of architects, builders, and clients produced a harmonious group of structures that share a single, classically oriented visual imagery using similar materials and details.

Mixed in among the predominantly residential buildings are examples of other building types that support residential life, including churches, stores, garages, a YMCA complex (formerly),

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[9] City of San Francisco Planning Department. 1994. San Francisco Planning Code: Appendix J to Article 10 – Civic Center Historic District, Section 5.

[10] Michael R. Corbett and Anne Bloomfield. 2008. *National Register of Historic Places Registration Form – Uptown Tenderloin Historic District*, Section 7, p. 3-9, and Section 8, p. 35-39.

and a bathhouse. In addition, there are a few building types that are not directly related to the residential neighborhood—machine shops, office buildings, union halls, and film exchanges. While not necessarily related to residential life, the union halls (for example, those serving waitresses and musicians) and the film exchanges are related to the overlay of entertainment businesses in the neighborhood.

The character-defining features of the district are as follows:

- Three- to seven-story building height
- Multi-unit apartments, hotels, or apartment-hotels, as well as other building types that support residential life, including institutional and commercial uses
- Constructed of brick or reinforced concrete
- Bay windows on street facades, double-hung windows in the earlier buildings, casement windows with transoms in later buildings
- Flat roofs with parapets providing compositional space for decorative cornices
- Prominent fire escapes
- Decorative features: brick or stucco facings with molded galvanized iron, terra cotta, or cast concrete; deep-set windows in brick walls with segmental arches or iron lintels; decorative quoins; sandstone or terra cotta rusticated bases, columns, sills, lintels, quoins, entry arches, keystones, string courses
- Buildings occupy the entire width of the lot creating continuous street walls
- Elaborately detailed residential entrances
- Two- or three-part vertical building composition for apartment and hotel buildings, one- or two-part commercial composition for non-residential and small residential buildings
- Engraved or painted signs, bronze plaques, and neon signs

Existing UC Hastings Properties

As noted previously, the UC Hasting campus consists of six properties, which are described in the following paragraphs (see Figure 4.3-1).

100 McAllister Street (Block 348, Lot 6)

The August 2012 Historic Resource Evaluation report by Page & Turnbull, Inc. includes a detailed description of 100 McAllister Street (see Figure 4.3-3). 100 McAllister Street is located on a 137.5 feet by 137.5 feet square parcel on the northwest corner of McAllister and Leavenworth streets. Completed in 1929, 100 McAllister Street is a 27-story (plus two basements), steel frame and reinforced concrete skyscraper featuring Gothic Revival ornamentation and a stepped, Art Deco-influenced tower. 100 McAllister Street is essentially square at the base and maintains this massing to the fifth story level. Above the fifth story, the building steps back from the northwest corner and becomes an L-shaped structure. At the 14th story, mechanical penthouses are located toward the west and north, while the southeast corner of the building becomes a square tower rising to the 20th story. Above, the massing of the tower steps back again above the 20th, 24th and 26th stories. The various levels of the tower are typically capped by parapets featuring terra cotta panels, while the parapet at the fourteenth story features tracery ornament on the south and east elevations. The building is capped by a flat-roofed penthouse.

The exterior of the building is primarily clad with brick (American bond), glazed terra cotta and copper, including the extensive use of copper spandrels featuring Gothic, Classical and zoological/mythological motifs. Nearly all of the building's ornament beneath the 15th story is concentrated on the south and east facades, while the west facade and a portion of the north facade are clad only with brick. On the remainder of the north facade, as well as the interior of the L-shaped massing between the fifth and 15th stories, the building is clad with what appears to be a stucco skim coat over cast-in-place concrete.

On the ground floor (which is marked by a double-height volume on the south and east facades) typical fenestration consists of divided steel-sash windows in arched terra cotta surrounds. Upper story fenestration is typically comprised of double-hung wood-sash windows in molded surrounds. Where the structure steps back on the upper levels, the windows just beneath the setback are typically crowned with a terra cotta keystone arch, which serves as the base for additional Gothic terra-cotta ornament at the parapet.[11]

100 McAllister Street was designed by Miller & Pfleuger and Lewis P. Hobart in 1927 as the Temple Methodist Church and William Taylor Hotel. The property was determined eligible for listing on the NRHP in 1978 and has a California Historical Resource Status Code of 2S (individual property determined eligible for National Register by the Keeper and listed on the CRHR). 100 McAllister Street is also identified as a contributor to the Uptown Tenderloin Historic District. San Francisco Planning Code Article 11 lists 100 McAllister Street as a Category I building, meaning "Significant Building, No Alterations."[12]

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[11] Page & Turnbull. 2012. *100 McAllister Street Historic Resource Evaluation Report*, p. 3-6.

[12] Corbett and Bloomfield, *Uptown Tenderloin Historic District,* Section 7, page 77. Office of Historic Preservation. 2012. "100 McAllister St, The Federal Building, Temple Methodist, Primary # 38-000998," *OHP Historic Properties Directory, Historic Data File for San Francisco,* p. 126. City of San Francisco Planning Department. 2015. San Francisco Property Information Map – 100 McAllister Street. Online: http://propertymap.sfplanning.org/?dept=planning. Site visited on November 16, 2015.

Source: Carey & Co. 2015

FIGURE 4.3-3: 100 MCALLISTER STREET

(Category I buildings under the Planning Code, in general, may not be demolished unless it can be demonstrated that they have no substantial market value or reasonable use, after taking into account costs of rehabilitation and any development rights transferred to another site.)

UC Hastings acquired the building from the federal government in 1978. It was renovated for campus housing by 1982, with ongoing renovation over the years: a student/alumni lounge in 1999, fire/life/safety and seismic work in 2003, and a student center in 2004.

The prior historic resource evaluation of 100 McAllister Street by Page & Turnbull identified the following character-defining interior features: [13]

- The lobby features a double-height volume, marble floors, rusticated plaster walls, square columns, and a molded plaster ceiling with a circle-and-square chain motif. A large (non-original) stained-glass window is above the primary entry memorializing the Battle of Hastings.

- A second-floor mezzanine, accessed by marble stairs with a scrolling wrought-iron banister.

- The dining room (now a fitness center) has a double-height volume with wood parquet floors and a plaster ceiling identical to that in the lobby. It is illuminated by arched windows on the east; similar arched openings on the west are inset with mirrors.

- The coffee shop (now a student lounge) features paneled wood walls and a beamed ceiling.

- The Sky Room (now a meeting space/study area) on the 24th floor has been remodeled since its installation in the 1930s, and now is marked by large window openings.

Those interior features are in good condition and continue to convey their historic character.

The Great Hall, built as the Temple Methodist Church, is oriented on a north-south axis connected to the west side of the 100 McAllister Street Tower. The church was closed by 1937, and the church's main hall was converted to a parking garage and later used as office space during the Federal government's ownership of the building from 1942 through 1978, with a dropped ceiling, but several original details remain. The Great Hall encompasses a five-story volume featuring massive fluted ribs and a vaulted ceiling. The remnants of the altar are located at the north end and marked by a large arched opening featuring a rose window. The south end includes a former reception room and pastor's office, which includes trefoil arched windows. According to the original building plans, this area was crowned with a gallery. The east and west sides of the church feature pairs of tall lancet arch colored-glass windows topped with

[13] Page & Turnbull. 2012. *100 McAllister Street Historic Resource Evaluation Report*, p. 10.

oculus windows. Most of the church's architectural details were created using plaster over metal lath.

Currently, the Great Hall is not open to the public, due to concerns over the structural integrity of the vaulted ceilings and the presence of asbestos. The main entrance to the church is on McAllister Street, but it is fenced off. Limited access is provided through the lobby of the Tower. The five-story volume with fluted ribs and a vaulted ceiling, the rose window on north end, pairs of tall lancet arch windows with oculus windows on the east and west are among the features that are still intact and define the Great Hall. In terms of plaster work, only the upper half of the walls and the ceiling is extant. However, the plaster—all of which contains asbestos—is in an advanced state of deterioration and calcification. The ceiling is pierced with countless holes resulting from the installation of the dropped ceiling. The trefoil arched windows on the south end of the Great Hall are highly deteriorated.

The Page & Turnbull evaluation did not identify the Great Hall as a significant interior public space. [14] The Great Hall does not retain its historic significance due to the countless modifications over time and the extensive physical damage and deterioration of its character defining features. However, the space still exhibits the style, volume, and architectural features of a church design.

198 McAllister Street (Block 348, Lot 9)

198 McAllister Street, also known as Snodgrass Hall or the Original Building, is on a 137.5-foot by 165-foot parcel at the northeast corner of McAllister and Hyde streets. Completed in 1953, the Modern building is oriented toward McAllister Street and has a 45-foot-deep raised plaza on the south side with trees, planters, and tables (see Figure 4.3-4, 198 McAllister Street).[15] The 10-foot-high plaza walls on the south and east sides are clad in dark green marble. A stairway rises to the plaza from Hyde Street and an accessible elevator is located at the southwest corner. A vehicle ramp to the east of the plaza leads to the basement from McAllister Street.

The steel-frame and reinforced concrete building with four stories and three mezzanines is composed of a rectangular block capped by flat roofs with parapets. The precast cementitious panel-clad exterior is articulated on the south side.

The south (front) elevation of the building consists of three parts: a slightly recessed, articulated central section and precast panel-clad walls on both sides of the entrance. This central section is divided vertically into nine bays with piers. The four-bay-wide main entrance is located toward the west and the rest of the bays on the ground floor are clad in large red/brown marble panels. A flat, projecting canopy over the entrance is supported by columns clad in a dark gray marble.

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[14] Page & Turnbull. 2012. *100 McAllister Street Historic Resource Evaluation Report*, p. 10.

[15] The Modern style featured strong right angles and simple cubic forms, projecting vertical elements, exposed building materials, flat roofs, articulated primary facades, and lack of architectural ornamentation.

The glazed triple doors with transoms are located at two central bays with fixed aluminum storefronts on both sides. On the upper floors, each bay is subdivided by aluminum louvres and sun baffles, and has three windows behind. The primary window type is aluminum-sash, two-part single-hung.

198 McAllister Street contains classrooms and lecture halls, organization and academic support space, and offices. The building was renovated in 1970 and again in 1998-1999 when a partial seismic retrofit was completed. The brown marble-clad lobby space, tile and terrazzo staircase at the southwest corner, mail slots, and some of the original doors are some of the remaining features.

198 McAllister Street and the Annex at 50 Hyde Street are physically connected on the interior, although the two buildings appear to be visually separate structures.

50 Hyde Street (Block 348, Lot 14)

50 Hyde Street, also known as the Annex, is on a 137.5-foot by 68.75-foot parcel at the southeast corner of Hyde Street and Golden Gate Avenue. Completed in 1970, the four-story, reinforced concrete Brutalist building is rectangular in plan.[16] The north and west elevations are divided into six and 11 bays, respectively, by sandblasted concrete columns (see Figure 4.3-5, 50 Hyde Street). The eastern bay on the north elevation has a semi-open vestibule with metal railings on all floors but the rest of the bays are almost identical to each other. Each bay has terrazzo cladding (up to 5 to 11 feet depending on the grade) and a three-part aluminum-sash window on the first floor. The area between the columns is clad in precast concrete panels from the second to fifth floors. The fourth and fifth floors have narrow aluminum-sash windows on both sides of the columns. The sixth floor has a bay window in each structural bay constructed with precast concrete panels and aluminum-sash windows. The building ends with a sandblasted concrete parapet and a flat roof. The building is in good cosmetic condition.

50 Hyde Street contains the Louis B. Mayer multi-purpose room, the largest indoor gathering space on campus; Reading Room; Moot Court, and various faculty administration offices. Most of the interior was renovated in 1999. The Original Building at 198 McAllister Street and the Annex at 50 Hyde Street are physically connected on the interior.

[16] "The term Brutalism is derived from the French term "beton brut" or raw concrete...The architectural style evolves from Le Corbusier's 1940s-1950s experimentation with rough concrete in its crudest, most brutal form. Brutalist buildings often incorporate large expanses of glass; however, fenestration is often deeply recessed, resulting in shadowed windows that appear as dark voids. The plasticity of reinforced concrete allows for a myriad of shapes and forms, though repetitive angled geometries predominate. Concrete is poured on site and left unpolished, often revealing the texture and grain of wood forms and small pebbles of the aggregate." (Excerpted from Mary Brown, 2011, *San Francisco Modern Architecture and Landscape Design 1935-1970, Historic Context Statement*, p. 138.)

FIGURE 4.3-4: 198 MCALLISTER STREET

FIGURE 4.3-5: 50 HYDE STREET

200 McAllister Street (Block 347, Lots 1 to 4)

200 McAllister Street, also known as Kane Hall, is at the northwest corner of McAllister and Hyde Streets extending north to Golden Gate Avenue. Designed by Skidmore, Owings & Merrill and completed in 1980, the six-story steel-frame building with precast concrete panels is rectangular in plan and has a flat roof (see Figure 4.3-6, 200 McAllister Street). An outdoor patio area, approximately 25 feet wide, is on the west side at street level. The main entrance at the corner of McAllister and Hyde streets is set back, creating a three-story-high "colonnaded" entry court in front of glazed doors. Above the entrance level, the two-story-high glass surfaces of the south elevation wrap around the corners for another structural bay toward the east and west. The rest of the elevations follow a design with precast concrete panels and aluminum-sash ribbon windows. Each set of windows is separated by the next set by concrete columns. Although the building has windows on all elevations, some levels are dominated by large precast concrete panels: the fifth and sixth floors on the north and south sides and the third floor on the east and west sides. The overall condition of the building is good.

The building had minor remodels in 1997 and 2000-2001. The building was renovated extensively in 2007, providing enhanced seismic safety, improved mechanical systems, and a redesigned library. The building houses many of the campus' faculty and administrative offices, the main library, cafeteria, faculty lounge and meeting rooms, and various student support facilities.

376 Larkin Street (Block 347, Lot 16)

The seven-story building plus basement parking garage with ground-floor retail was completed in 2009 (see Figure 4.3-7, 376 Larkin Street). The reinforced concrete building is rectangular in plan with a chamfered northwest corner. The garage is open on two sides: the north and west elevations are divided into eight and five structural bays, respectively. Exterior cladding is a combination of plaster, glass, concrete, metal louvers, and metal window mullions. The entrance and exit ramps to the garage are located on Larkin Street. The ground-floor retail spaces fronting Golden Gate Avenue and Larkin Street have glazed storefronts with metal canopies. The overall condition of the building is good.

333 Golden Gate Avenue (Block 347, Lot 17)

The rectangular lot (87 feet by 137.5 feet) is between the parking garage at 376 Larkin Street and Kane Hall at 200 McAllister Street (see Figure 4.3-8, 333 Golden Gate Avenue). The lot housed a two-story commercial building that was noted as a "machine shop" on the first floor and a "cabinet, drapery and upholstering shop" on the second floor on the 1948 and 1950 Sanborn maps.[17]

[17] Sanborn Fire Insurance Map, San Francisco 1913 updated 1948, Volume 1, Sheet 94. Sanborn Fire Insurance Map, San Francisco 1913 updated 1950, Volume 1, Sheet 94.

FIGURE 4.3-6: 200 MCALLISTER STREET

FIGURE 4.3-7: 376 LARKIN STREET

Source: Carey & Co. 2015

Source: Carey & Co. 2015

FIGURE 4.3-8: 333 GOLDEN GATE AVENUE

The building was damaged during the 1989 Loma Prieta Earthquake and demolished in 1990.[18] The lot, together with other parcels to the west, was used as surface parking until construction of the UC Hastings Parking Garage at 376 Larkin Street. The undeveloped lot at 333 Golden Gate Avenue is currently in use as a community garden and recreational area jointly used by neighboring schools, community centers, and UC Hastings students.

Surrounding Properties

Development activities associated with the LRCP might affect properties near the proposed LRCP sites (see Figures 4.3-2, Historic Resources at UC Hastings and Vicinity, 4.3-9, 132-154 McAllister Street, and 4.3-10, 255 Golden Gate Avenue). These properties are listed in Table 4.3-1, Surrounding Properties.

Table 4.3-1: Surrounding Properties

Address	Block/Lot	Construction Date	Architect / Builder	Listing
260 Golden Gate Avenue	345 / 7	1967	Albert F. Roller	--
276-284 Golden Gate Avenue	345 / 8	1913	Charles E.J. Rogers	Contributor to the Uptown Tenderloin Historic District (UTHD)
100-120 Hyde Street	345 / 9	1913	--	Contributor to the UTHD
101 Hyde Street	346 / 3A	1960 (renovated in 1991)	Aleck L. Wilson	--
350 Golden Gate Avenue	346 / 24	2001	--	--
246 McAllister Street	347 / 5	1926	Peter Midbust	--
250 McAllister Street	347 / 6	1923	Joseph Greenback	--
260 McAllister Street	347 / 6A	1924	Fred M. Kimball	--
132-154 McAllister Street	348 / 7	1910 (addition in 1920)	Bliss & Faville; Edward Rolkin	Contributor to the UTHD; Category I under Article 11
277 Golden Gate Avenue	348 / 15	1954; replaced in 2012–13)	--	--
255 Golden Gate Avenue	348 / 17	1916	Reid Brothers	Contributor to the UTHD; Category II under Article 11
50 United Nations Plaza	351 / 35	1936	Arthur Brown	Contributor to the Civic Center Historic Districts
200 Larkin Street	353 / 1	1916 (renovated in the late 1990s)	George Kelham	Contributor to the Civic Center Historic Districts
Sources: San Francisco Property Information Map, Online: http://propertymap.sfplanning.org/?dept=planning; City of San Francisco Department of Building Inspection Archives; City of San Francisco Planning Department Archives; Corbett and Bloomfield, *Uptown Tenderloin Historic District.*				

[18] EIP Associates. *Hastings Parking Garage Project Draft SEIR*, p. 45.

FIGURE 4.3-9: 132-154 MCALLISTER STREET

FIGURE 4.3-10: 255 GOLDEN GATE AVENUE

Source: Carey & Co. 2015

Of the structures listed in Table 4.3-1, the following two structures are immediately adjacent to the UC Hastings campus sites, and would be potentially directly affected by LRCP development activities.

132–154 McAllister Street (Block 348, Lot 7)

This six-story building plus basement apartment/hotel with ground-floor retail is rectangular in plan. The steel-frame building with Renaissance/Baroque ornamentation has a brick facade and a flat roof with a galvanized iron cornice. The primary window type is one-over-one single-hung. The storefronts have marble bulkheads and angled display windows, some of which were altered. There are two fire escapes with decorative balconies on the façade. The west elevation of the building is a blind brick wall with a single window and a mural painted by artist James Reka in 2013. The overall condition of the building is good.

Designed by Bliss & Faville and constructed as stores and apartment houses in 1910 with a 1920 addition by Edward Rolkin, the building is identified as a contributor to the Uptown Tenderloin Historic District and designated as a Category I building, meaning "Significant Building, No Alterations," under Article 11 of the Planning Code.[19]

255 Golden Gate Avenue (Block 348, Lot 17)

This one-story brick building is L-shaped in plan and capped by a flat roof. The front façade has stucco cladding and Renaissance/Baroque ornamentation. It is divided into three bays by Corinthian pilasters; the pilasters are paired at each end. Each bay is filled with a round arch that has a fixed window. A swag frieze runs above the arches. An unadorned entablature, a classical cornice with dentil course, and an articulated parapet completes the design. The east elevation facing the Continuum Alley is brick with arched windows and a decorative belt course. Alterations include aluminum windows, a vestibule, and doorway. The overall condition of the building is good.

Designed by Reid Brothers and constructed as a sales room and offices in 1916, the building is identified as a contributor to the Uptown Tenderloin Historic District and designated as a category II building, meaning "Significant Building, Possible Alterations," under Article 11 of the Planning Code.[20]

Prehistoric Setting

This section describes the prehistoric and historic cultural changes in the San Francisco Bay Area. No discussion of the Clovis time (11500 to 8000 calibrated Before Present [cal. B.P.]) is provided, as there has been no evidence related to this time found in the San Francisco Bay

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[19] Corbett and Bloomfield, *Uptown Tenderloin Historic District,* Section 7, p. 74. City of San Francisco Planning Department. 2015. San Francisco Property Information Map – 132-154 McAllister Street. Online: http://propertymap.sfplanning.org/?dept=planning. Site visited on November 16, 2015.

[20] Ibid

Area. The sequence used here is very broad and includes the Lower, Middle, and Late Archaic periods, and the Emergent Occupation.

Lower Archaic (8000 to 3500 cal. B.P.) A generalized mobile forager pattern among prehistoric groups is characterized by portable milling stones, milling slabs (metates), and handstones (manos), as well as wide-stemmed projectile points. Archeobotanical remains suggest an economy focused on acorns.

Middle Archaic (3500 to 500 cal. B.P.) During the Middle Archaic there appears to be an increase in regional trade and possibly signs of sedentism. The first cut shell beads appear in mortuaries. Mortars and pestles are documented shortly after 4000 cal. B.P. Net sinkers are a typical marker for this time. The burial complexes with ornamental grave associations seem to represent a movement from forager to semi-sedentary land use.[21]

Upper Archaic (500 cal. B.P. to cal. Anno Domini [A.D.] 1050) The Upper Archaic period shows continued specialization and an increase in the complexity of technology. Acorns and fish are the predominant food sources. New bone tools and ornaments appear, including whistles and barbless fish spears. Beads become prominent, with several types. Mortars and pestles continue to be the sole grinding tools. Net sinkers disappear at most sites. Mortuary practices change from a flexed position to an extended position.

Emergent (cal. A.D. 1050 to Historic) Many archaeologists believe that craft specialization, political complexity, and social ranking were highly developed. New bead types and multi-perforated and bar-scored ornaments appear. The bow and arrow replace the dart and atlatl as the favored hunting tools).[22] Cultural traditions seem to be very similar to those witnessed at the time of European contact.

Archaeological Resources

Archaeological Record Search

The California Historic Resources Information System maintains regional offices that manage site records for known cultural resource locations and related technical studies. The regional office for San Francisco is the Northwest Information Center at Sonoma State University in Rohnert Park, California. Information regarding cultural resource studies and archaeological sites was compiled using a 0.25-mile radius around the UC Hastings campus. Sources reviewed include all known and recorded archaeological and historic sites and cultural resource reports. Additional resources consulted for relevant information included the NRHP, CRHR, California

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[21] Milliken, Randall et al. 2007. "Punctuated Culture Change in the San Francisco Bay Area." In California Prehistory Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar. pages 99-123. AltaMira Press, London.

[22] Moratto, Michael. 1984. California Archaeology. Academic Press, New York, New York.

Inventory of Historic Resources, California Points of Historical Interest, California Historical Landmarks, and historic maps.

The archaeological record search for the project was requested on December 10, 2015, and was conducted on December 21, 2015.[23] The record search identified 31 previously recorded cultural resources within a 0.25-mile radius, and two within the footprint of the UC Hastings campus (see Table 4.3-2, Cultural Resources Previously Recorded within/adjacent to the UC Hastings Campus).

Table 4.3-2: Cultural Resources Previously Recorded within/adjacent to the UC Hastings Campus

Primary Number	Brief Description	Recorder and Date
38-4672	Original Auxiliary Water Supply System built between 1908 and 1913	Tetra Tech, 2009
38-5269	Uptown Tenderloin Historic District-National Register	Office of Historic Preservation, 2009
Source: Northwest Information Center 2015		

The record search indicated that a total of 58 cultural resource studies have been completed within a 0.25-mile radius of the UC Hastings campus; of these, three include portions of the UC Hastings campus area. Of the 58 studies, only one was related to a subsurface prehistoric archaeological site, a deeply buried site in the Market Street area discovered during BART construction. The remaining records were related to historic structures.

No on-site archaeological survey was conducted because the area has had major ground disturbance in the past, including existing buildings, or is currently covered by asphalt (333 Golden Gate Avenue).

Ethnographic Setting

San Francisco lies within the territory of the Ohlone, once referred to by the Spanish as Costanos (for "coastal people"). The Costanoan group occupied the coast of California from San Francisco to Monterey and inland to include the mountains from the southern side of the Carquinez Strait to the eastern side of the Salinas River south of the Chalone Creek. The aboriginal way of life for the Ohlone was disrupted by the influx of explorers and the establishment of missions by the Spanish in the late eighteenth century. Colonization and occupation of their land by Spanish, Mexicans, and then Anglo-Americans substantially reduced native populations, displaced them, and dramatically altered their traditional way of life. Costanoan is a linguistic subfamily

[23] Northwest Information Center. 2015. Record search of UC Hastings Campus using a 0.25-mile surrounding radius.

of the Penutian language stock. Miwok (such as that spoken by the Coast Miwok north of the Golden Gate) is the closest related language. [24]

For the Ohlone as a whole, the basic unit of political organization was a territory-holding group of one or more associated villages and smaller temporary encampments. Political units within each ethnic group were called tribelets and each tribelet contained between 50 and 500 people, [25] these groups were generally considered independent, multi-family, landholding groups. Permanent villages were established near the coast and on river drainages, while temporary camps were located in prime resource-processing areas.

The Costanoans were hunter gatherers, with acorns being the most important plant food. Various roots, nuts, berries, and seeds were important. The Costanoan group's practices included managed burning of chaparral to encourage sprouting of seed plants and improve browsing for deer and elk. The favored animals for hunting were deer and rabbit. Whales and sea lions were eaten when found stranded on the beach. Waterfowl were captured in nets using decoys. Important fish were steelhead, salmon, and sturgeon, and mussels and abalone were the preferred shellfish. Dome thatched houses with rectangular doorways and a central hearth were the standard dwellings. Technology included tule balsa canoes, bows and arrows, and baskets.

Native American Heritage Commission

UC Hastings contacted the Native American Heritage Commission (NAHC) on December 2, 2015), regarding the potential presence of burials and sacred lands in the project area and vicinity, and for a listing of Native American individuals and/or organizations that may have interest in the LRCP or have knowledge of cultural resources on or near the UC Hastings campus. The list of entities that the NAHC provided were contacted on February 3, 2016, to notify them of the potential LRCP development projects.[26] During the 30-day comment period, no Native American tribal representatives contacted UC Hastings to request consultation.

Regulatory Setting

The regulatory setting provides an overview of federal, state, and local criteria used to assess historic significance and archaeological resources.

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[24] Levy, Richard. 1978. "Costanoan." In California, edited by R. F. Heizer, pages 485-495. Handbook of North American Indians, Vol. 8, W.C. Sturtevant, general editor, Smithsonian Institution. Washington, D.C.

[25] Kroeber A.L. 1925. Handbook of the Indians of California. Bureau of American Ethnology, Bulletin 78. Government Printing Office, Washington, D.C.

[26] UC Hastings notified tribal representatives listed by the Native American Heritage Commission, letter to David Seward, Chief Financial Officer, January 25, 2016.

Federal

National Register Criteria

National Register Bulletin Number 15, How to Apply the National Register Criteria for Evaluation, describes the Criteria for Evaluation as being composed of two factors. First, the property must be "associated with an important historic context."[27]

The National Register identifies the following four possible context types, of which at least one must be applicable at the national, state, or local level:

- Property is associated with events that have made a significant contribution to the broad patterns of our history.
- Property is associated with the lives of persons significant in our past.
- Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- Property has yielded, or is likely to yield, information important to prehistory or history.[28]

Second, for a property to qualify under the National Register's Criteria for Evaluation, it must also retain "historic integrity of those features necessary to convey its significance."[29] While a property's significance relates to its role within a specific historic context, its integrity refers to "a property's physical features and how they relate to its significance."[30] To determine if a property retains the physical characteristics corresponding to its historic context, the National Register has identified seven aspects of integrity:

- Location is the place where the historic property was constructed or the place where the historic event occurred.
- Design is the combination of elements that create the form, plan, space, structure, and style of a property.
- Setting is the physical environment of a historic property.

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[27] National Park Service. 1995. *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, page 3.
[28] National Park Service. 1997. *National Register Bulletin 16A: How to Complete the National Register Registration Form,* p. 75.
[29] National Park Service. *National Register Bulletin 15,* p. 3.
[30] Ibid, p. 44-45.

- Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.
- Association is the direct link between an important historic event or person and a historic property.[31]

Because integrity is based on a property's significance within a specific historic context, an evaluation of a property's integrity can only occur after historic significance has been established.[32]

Native American Graves Protection and Repatriation Act

For activities on federal lands, the Native American Graves Protection and Repatriation Act (NAGPRA), enacted in 1990, provides a framework for determining the rights of lineal descendants and Native American tribes to repatriate Native American remains, funerary objects, sacred objects, or other objects of cultural patrimony with which they are associated. NAGPRA applies to items found on federal lands, and agencies that obtain federal funding. It requires consultation with "appropriate" Indian tribes prior to the intentional excavation, or removal after inadvertent discovery, of several kinds of cultural items, including human remains and objects of cultural patrimony.

Archaeological Resources Protection Act of 1979

The Archaeological Resources Protection Act applies to projects that are located on public lands and Native American lands. The purpose of this act is "the protection of archaeological resources and sites which are on public lands and Indian lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals having collections of archaeological resources and data which were obtained before the date of the enactment of this Act."

State

The California Office of Historic Preservation's Technical Assistance Series #6, California Register and National Register: A Comparison outlines the differences between the federal and

[31] Ibid.
[32] Ibid.

state processes. It includes the following context types to establish the significance of a property for listing on the California Register:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or is likely to yield, information important to prehistory or history of the local area, California, or the nation.[33]

Like the NRHP, evaluation for eligibility to the CRHR requires an establishment of historic significance before integrity is considered. However, California's integrity threshold is slightly lower than the federal level. California's list of special considerations is shorter and more lenient than the NRHP. As a result, some resources that are historically significant but do not meet NRHP integrity standards may be eligible for listing on the CRHR.[34]

In addition to separate evaluations for eligibility to the CRHR, the state will automatically list resources if they are listed or determined eligible for the NRHP through a complete evaluation process.[35]

California Historical Resource Status Codes

The California Historical Resource Status Codes (status codes) are ratings created by the California Office of Historic Preservation to identify the historic status of resources listed in the state's historic properties database. The following are the seven major status code headings:

1. Properties listed in the NRHP or the CRHR
2. Properties determined eligible for listing in the NRHP or the CRHR
3. Appears eligible for the NRHP or CRHR through Survey Evaluation
4. Appears eligible for the NRHP or CRHR through other evaluation
5. Properties recognized as historically significant by local government
6. Not eligible for listing or designation
7. Not evaluated for the NRHP or CRHR or needs revaluation

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[33] California Office of Historic Preservation. 2011. *Technical Assistance Series #6 California Register and National Register: A Comparison*, p. 1.

[34] Ibid.

[35] All State Historical Landmarks from number 770 onward are also automatically listed on the California Register. (California Office of Historic Preservation. *Technical Assistance Series #5 California Register of Historical Resources: the Listing Process*, p. 1.)

California Environmental Quality Act

When a proposed project has an effect that may cause a substantial adverse change in the significance of a historical resource, CEQA requires a city or county to carefully consider the possible impacts before proceeding (Public Resources Code Sections 21084 and 21084.1). CEQA equates a substantial adverse change in the significance of a historical resource with a significant effect on the environment (Section 21084.1). It defines "substantial adverse change" as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The Act explicitly prohibits the use of a CEQA categorical exemption for projects that may cause such a change (Section 21084). Under CEQA Guidelines Section 15126.4(b)(1), projects that comply with the Secretary of the Interior's Standards for treatment of historic properties are generally considered to have less-than-significant impacts on cultural resources.

CEQA effectively requires preparation of a Mitigated Negative Declaration or an EIR whenever a project has an effect that may cause a substantial adverse change in the significance of a historic resource. Current CEQA law provides that an EIR must be prepared whenever it can be fairly argued, on the basis of substantial evidence in the administrative record, that a project may have a significant effect on a historical resource (CEQA Guidelines Section 15064.5).

For the purposes of CEQA (Guidelines Section 15064.5), the term "historical resources" shall include the following:

1. A resource listed in, or determined to be eligible by, the State Historical Resources Commission for listing in the CRHR.[36]
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3. Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

[36] Public Resources Code Section 5024.1, Title 14 CCR, Section 4850 et. seq.

Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing in the CRHR as follows: [37]

a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

b) Is associated with the lives of persons important in our past;

c) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

d) Has yielded, or may be likely to yield, information important in prehistory or history.

As defined in Section 15064.5(1) of the CEQA Guidelines, a "unique archaeological resource" is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historical event or person (Public Resources Code Section 21083.2[g]).

Assembly Bill 52

California Assembly Bill (AB) 52 was enacted on September 25, 2014, and specifies that any project that may cause a substantial adverse change to a tribal cultural resource is a project that may have a significant effect on the environment. The bill, defined in PRC Section 21074, describes "tribal cultural resources" as (1) sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and is either on or eligible for inclusion in the CRHR; and (2) a resource determined by a lead agency, at its discretion and supported by substantial evidence, to be significant. As of July 1, 2015, AB 52 requires early notification and, if requested by a tribe, consultation with tribes on the NAHC list. Although the CEQA Guidelines will not be updated with the new question regarding tribal cultural resources until July 2016, in the interim period, the Governor's Office of Planning and Research suggests that lead agencies consider the following question in their environmental documents—Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?

[37] Public Resources Code Section 5024.1, Title 14 CCR, Section 4800.3.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (Cal NAGPRA) of 2001 is contained in the California Health and Safety Code Sections 8010-8021 and 8025-8030. Cal NAGPRA provides for the repatriation of human remains and cultural items in the possession or control of a state or local agency or museum to the rightful California Native American tribe. This law defines the term California Native American tribe to include non-federally recognized groups.

California Public Resources Code

Provisions regarding the treatment of human remains are found under the Public Resources Code. These provisions are detailed in Section 5097.9 through 5097.996. These sections explain the actions to be taken when Native American remains are found. Section 7050.5 of the California Health and Safety Code states that anyone who knowingly disinters, disturbs, or willfully removes any human remains in or from any location other than a cemetery without the authority of law is guilty of a misdemeanor, except specific circumstances. If a county coroner determines that remains found during excavation or disturbance of land are Native American, the coroner must contact the NAHC within 48 hours, and the NAHC must determine and notify a Most Likely Descendent who shall complete inspection of the site within 24 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Local

San Francisco Planning Code

As noted previously, a resource included in a local register of historical resources is considered a significant historic resource for purposes of CEQA. San Francisco architectural landmark and historic district listings in Planning Code Articles 10 and 11 are, therefore, noted as part of setting and evaluation information. As a state entity, UC Hastings is not subject to City and County of San Francisco jurisdiction, or its planning and land use controls; however, San Francisco Planning Code review steps are noted below for informational purposes:

San Francisco maintains a list of locally designated City Landmarks and Historic Districts, similar to the NRHP but at the local level. The regulations governing landmarks, as well as the list of individual landmarks and descriptions of each Historic District, are found in Article 10 of the San Francisco Planning Code. Landmarks can be buildings, sites, or landscape features of special character or special historical, architectural, or aesthetic interest or value and are an important part of the City's historical and architectural heritage. Districts are defined generally as an area of multiple historic resources that are contextually united. 230 landmark sites and 11 historic districts have been adopted by the City since 1967 and are listed as appendices to

Article 10. The San Francisco Civic Center Historic District was listed as a Historic District in Article 10 of the San Francisco Planning Code on December 23, 1994.[38]

Article 11 of the San Francisco Planning Code identifies buildings in the C-3 districts (generally, Downtown) which have "special architectural, historical, and aesthetic value" and "contribute substantially to San Francisco's reputation throughout the United States as a City of outstanding beauty and physical harmony"(Sec. 1101 (a)). Each building on the Article 11 list is given a rating corresponding to the Category I-V system established in the Downtown Plan, an area plan of the San Francisco General Plan. Category I and II buildings are identified as Significant Buildings and, in general, may not be demolished unless it can be demonstrated that they have no substantial market value or reasonable use, after taking into account costs of rehabilitation and any development rights transferred to another site. Category III and IV buildings are identified as Contributory Buildings, and their retention is encouraged, but not required. Category V buildings are Unrated and are not included on the Article 11 list. The Category I-V ratings are based in part on the surveys conducted by San Francisco Heritage, a non-profit organization that studies and advocates for preservation of San Francisco historic architecture. The buildings at 100 McAllister Street and 132-154 McAllister Street are listed as Category I buildings in Article 11 of the San Francisco Planning Code. The building at 255 Golden Gate Avenue is listed as a Category II building in Article 11 of the San Francisco Planning Code.

Evaluation

The UC Hastings campus includes one listed historic resource (see Figure 4.3-2):

- 100 McAllister Street: determined eligible for listing on the NRHP in 1978; Category I building under Planning Code Article 11, contributor to the Uptown Tenderloin Historic District

Six other listed historical resources are in the immediate vicinity of the UC Hastings campus:

- 276-284 Golden Gate Avenue: contributor to the Uptown Tenderloin Historic District
- 100-120 Hyde Street: contributor to the Uptown Tenderloin Historic District
- 132-154 McAllister Street: contributor to the Uptown Tenderloin Historic District, Category I building under Article 11

[38] City of San Francisco Planning Department. 2014. *San Francisco Preservation Bulletin No. 9: San Francisco Landmarks.* City of San Francisco Planning Department. 2015. "Historic Preservation." Online: http://www.sf-planning.org/index.aspx?page=1825. Site visited on November 19, 2015. City of San Francisco Planning Department. 1994. San Francisco Planning Code: Appendix J to Article 10 – Civic Center Historic District.

- 255 Golden Gate Avenue: contributor to the Uptown Tenderloin Historic District, Category II building under Article 11
- 50 United Nations Plaza: contributor to the Civic Center historic districts
- 200 Larkin Street: contributor to the Civic Center historic districts

As noted under Existing UC Hastings Properties, the UC Hastings campus is within or adjacent to several historic districts.

- Uptown Tenderloin Historic District
- Civic Center historic districts (National Register-listed historic district, National Historic Landmark District, San Francisco Article 10 Landmark District).

UC Hastings properties that are less than 45 years old are not considered potential historic resources for purposes of CEQA, and no significance evaluation was conducted. Those properties also do not meet the special criteria consideration requirements to be listed in the CRHR. A period of sufficient time has not passed "to obtain a scholarly perspective on the events or individuals associated with the resource."

These properties include the following:

- 200 McAllister Street: completed in 1980
- 376 Larkin Street: completed in 2009
- 333 Golden Gate Avenue (community garden and recreational area)

The UC Hastings properties greater than 45 years of age are evaluated in the following paragraphs for their eligibility for listing in the NRHP, CRHR, and/or local listing.

198 McAllister Street

198 McAllister Street does not appear eligible for the NRHP, CRHR, or local listing under Criterion 1/A.[39] The property, also known as Snodgrass Hall or the Original Building, was completed and dedicated in 1953. The building was designed and constructed during a period of unprecedented growth in San Francisco. The building was the school's first permanent home since its establishment in 1878 as the UC law department.[40] Although the building is associated with the development of San Francisco and UC Hastings, it is not associated with the history of UC Hastings or the city in an individually significant way. No persons of significance are known to be associated with the property; thus, it does not appear to be eligible for listing

[39] Carey & Co. 2015. State of California Department of Parks and Recreation Form 523 for 198 McAllister Street.
[40] "Work to start on Hastings Law Building." November 27, 1950. *San Francisco Chronicle*, page 11.

under Criterion 2/B. The building was designed by Masten & Hurd in the Modern architectural style and constructed by Monson Brothers.[41] Masten & Hurd was an architecture firm in San Francisco founded by partners Lester W. Hurd and Charles Franklin Masten Sr. in 1919, both of whom are noted as master architects in the San Francisco Modern Context Statement. The projects of the firm include Samuel Gompers Trade School (1939), Westside Courts, Public Housing (1943), as well as UC Press Building (Berkeley, 1939), US Veterans Administration Building (Fresno, 1949) and Foothill College (with Ernest Kump and Hideo Sasaki, Los Altos Hills, 1961).[42] Although Masten & Hurd are considered master architects and the building embodies the characteristics of Modern style, it is not a significant example of their work or a fine example of its style and does not appear eligible for listing under Criterion 3/C. The property is unlikely to yield information that is significant to history and does not appear to be eligible under Criterion 4/D.

50 Hyde Street

50 Hyde Street does not appear eligible for the NRHP, CRHR, or local listing under Criterion 1/A.[43] 50 Hyde Street, also known as the Annex, was completed in 1969 to respond to the rapidly growing student body. The building was designed as an addition to 198 McAllister Street. Although the building is associated with the development of UC Hastings, it is not associated with its history or the city in an individually significant way. No persons of significance are known to be associated with the property; thus, it does not appear to be eligible for listing under Criterion 2/B. The building was designed by the Office of Masten & Hurd, Inc. in the Brutalist architectural style.[44] The projects of the firm include Crespi Elementary School (Pacifica, 1968), De Anza College (with Ernest J. Kump, Cupertino, 1968), Monta Vista High School (Cupertino, 1969), and Foothill College District Office (Los Altos, 1969).[45] The Office of Masten & Hurd, Inc., continued later as Gwathmey, Sellier & Crosby, was a prominent firm in San Francisco and worked on institutional projects throughout the San Francisco Bay Area. Their Foothill College and De Anza College projects received honorary awards from the American Institute of Architects; however, 50 Hyde Street is not a significant example of their work. Even though the building embodies the characteristics of Brutalist style, it is not a fine example of the style. Therefore, the subject property does not appear eligible for listing under Criterion 3/C. The property is unlikely to yield information that is significant to history and does not appear to be eligible under Criterion 4/D.

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41 "Hastings Celebration." February 13, 1953. *San Francisco Chronicle,* page 10.

42 Mary Brown. 2011. *San Francisco Modern Architecture and Landscape Design 1935-1970, Historic Context Statement*, pages 238-246.

43 Carey & Co. 2015. State of California Department of Parks and Recreation Form 523 for 50 Hyde Street.

44 UC Hastings Archive. 1967. "Hastings College of the Law Building Addition Step 2," architectural drawings by the Office of Masten & Hurd, Inc., Gwathmey, Sellier, Crosby, Master, Hurd.

45 The American Institute of Architects Historical Directory of American Architects. 2015. s.v. "Gwathmey, Sellier & Crosby," (ahd4002243). Online: http://public.aia.org/sites/hdoaa/wiki/Wiki%20Pages/ahd4002243.aspx Site visited on November 4, 2015.

4.3.2 Impacts and Mitigation

Impact CR-1 Development under the LRCP would not impact historic architectural resources and would not adversely affect the character of the immediate surroundings of the adjacent Uptown Tenderloin and Civic Center Historic Districts. ***Less-than-Significant Impact***

333 Golden Gate Avenue Construction

The new academic building at 333 Golden Gate Avenue would be approximately 57,000 gsf and approximately 80 feet tall. However, to allow for design and engineering changes, an additional 10 feet in building height would be analyzed. The building would replace most academic programming and faculty offices currently at 198 McAllister Street, with the remainder relocated in available space in the 200 McAllister Street building.

Construction at 333 Golden Gate Avenue would have no direct impact on historical resources at the site because no known prehistoric or historic archaeological resources and no buildings are on the undeveloped lot. The proposed building at 333 Golden Gate Avenue would be approximately 65 feet from the Uptown Tenderloin Historic District and 150 feet from the boundaries of the Civic Center Historic Districts. Two buildings, 246 and 250 McAllister Street, separate 333 Golden Gate Avenue and the Civic Center Historic Districts. The proposed building would be visible from the historic districts, and as a result, could alter the immediate surroundings of the historic districts.

The general height, square footage, and uses for the building have been described previously. However, at this time there is no specific design for the building's architectural features, exterior materials, composition of the elevations, fenestration patterns, and other exterior details. New construction at 333 Golden Gate Avenue could have a different architectural character then the buildings in the historic districts, but the new building would not directly affect architectural resources within the districts, and would not impair the ability of the districts to convey their significance. The proposed development would also be bordered by structures of similar or greater height, scale, and mass, which are both within and outside of historic districts. Although the height of the building, at up to 90 feet, would result in a taller building than those characteristic of the Uptown Tenderloin Historic District, the additional height would not impair the ability of the historic district to continue to convey its historic significance. In addition, there are a number of tall buildings nearby, including the California State Building/455 Golden Gate Avenue/350 McAllister Street (14 stories/180 feet), Phillip Burton Federal Building and United States Courthouse/450 Golden Gate Avenue (20 stories/312 feet), 100 McAllister Street (27 stories), Kelly Cullen Community/220 Golden Gate Avenue (9 stories), and 421 Turk Street (8 stories), such that 333 Golden Gate Avenue would not be the sole taller building in the vicinity of the historic districts. Thus, development of the 333 Golden Gate Avenue building under the LRCP would not materially impair the significance of the Uptown

Tenderloin and Civic Center Historic Districts and would have a less-than-significant impact on the significance of historical resources.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Variant A would demolish Snodgrass Hall for construction of an approximately 13-story, 140-foot-tall, 227,000-gsf building that would provide approximately 400 to 600 housing units, and ground-floor student services or retail space to activate the street level. Demolition and development at 198 McAllister Street would occur after 2020 occupancy of 333 Golden Gate Avenue.

With demolition of 198 McAllister Street, 50 Hyde Street would require major HVAC and other building systems renovation and modernization to maintain important College functions, including the Louis B. Mayer Auditorium, Gold Reading Room, and Moot Court.

Demolition of 198 McAllister Street, a property that does not appear eligible for listing on the NRHP, CRHR, or local listing, would have no direct impact on historical resources at the site. The property is not within the boundaries of the Uptown Tenderloin Historic District or any of the three Civic Center historic districts, and the demolition would have no direct impact on the surrounding historic districts. The proposed building at 198 McAllister Street would be adjacent to the Uptown Tenderloin Historic District and across the street from the Civic Center historic districts. The LRCP Variant A development project would be visible from the historic districts, and as a result, could alter the immediate surroundings of the historic districts. The general height, square footage, and uses for the building have been described previously. However, at this time there is no specific design for the building's architectural features, exterior materials, composition of the elevations, fenestration patterns, and other exterior details. New construction at 198 McAllister Street could have a different architectural character than the buildings in the historic districts, but the new building would not directly affect architectural resources within the districts, and would not impair the ability of the districts to convey their significance. While the new building would be taller than the adjacent buildings and most nearby structures, it would be generally in scale with surrounding buildings and the neighborhood as a whole. Tall buildings within one block of the site include the California State Building/455 Golden Gate Avenue/350 McAllister Street (14 stories/180 feet), Phillip Burton Federal Building and United States Courthouse/450 Golden Gate Avenue (20 stories/312 feet), 351 Turk Street (12 stories), and 100 McAllister Street (27 stories). Although the building (up to 140 feet) would be taller than the existing 198 McAllister Street structure, the additional height would not impair the ability of the historic district to continue to convey its historic significance.

There are no historic structures on the 198 McAllister Street site. Variant A would renovate 50 Hyde Street, a property that does not appear eligible for listing on the NRHP, CRHR and/or the local listing, so there would be no direct impact on the historical resource. Renovation would not affect the exterior of the building with all work taking place on the interior. Thus, there would be no indirect impacts on the Uptown Tenderloin and Civic Center Historic Districts.

Overall, development of Variant A under the LRCP, including demolition of 198 McAllister Street, would not directly affect historic resources at the UC Hastings campus, including prehistoric and historic archaeological resources; would not materially impair the significance of the Uptown Tenderloin and Civic Center Historic Districts; and would have a less-than-significant impact on historical resources.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

Variant B would demolish 198 McAllister Street and develop an approximately 13-story, 140-foot-tall, 227,000-gsf campus housing facility with approximately 400 to 600 housing units (depending on unit size) and ground-floor commercial or retail space and/or UC Hastings facilities. Variant B would also demolish the 50 Hyde Street Annex, and would develop approximately 102,000 gsf with an additional approximately 125 to 170 housing units (depending on unit size) and approximately 64,000 sf dedicated to retail, academic, administrative, assembly, faculty, and multipurpose/support space on the ground and second floors to replace space in the 50 Hyde Street Annex. Variant B would include a total of approximately 329,000 gsf, with 525 to 770 campus housing units, and approximately 64,000 gsf of retail, academic, administrative, assembly, faculty, and multipurpose/support space. Demolition and development at 198 McAllister and 50 Hyde streets would occur after 2020 occupancy of 333 Golden Gate Avenue.

There are no known prehistoric or historic archaeological resources and there are no historic structures on the 198 McAllister Street site and 50 Hyde Street sites. Demolition of 198 McAllister Street and 50 Hyde Street, properties that do not appear eligible for listing on the NRHP, CRHR, and/or the local listing, would have no direct impact on historical resources. Both properties are located outside the boundaries of the Uptown Tenderloin Historic District and the Civic Center historic districts, and the demolition would have no direct impact on the surrounding historic districts. The proposed buildings would be adjacent to the Uptown Tenderloin Historic District and the Civic Center historic districts and would be visible from these historic districts, and as a result, could alter the immediate surroundings of the historic districts. The general height, square footage, and uses for the buildings have been described previously. However, at this time there is no specific design for the building's architectural features, exterior materials, composition of the elevations, fenestration patterns, and other exterior details. New construction at 198 McAllister Street and 50 Hyde Street could have a different architectural character then the buildings in the historic districts, but the new building would not directly affect architectural resources within the districts, and would not impair the ability of the districts to convey their significance.

While the new buildings would be taller than the adjacent buildings and most nearby structures, they would be generally in scale with surrounding buildings and the neighborhood as a whole. Tall buildings within one block of the site include the California State Building/455 Golden Gate Avenue/350 McAllister Street (14 stories/180 feet), Phillip Burton Federal Building and United States Courthouse/450 Golden Gate Avenue (20 stories/312 feet), 351 Turk Street (12 stories) and 100 McAllister Street (27 stories). Although the building (up to 140 feet) would be taller than the existing 198 McAllister Street and 50 Hyde Street structures, the additional height would not impair the ability of the historic district to continue to convey its historic significance.

Overall, development of Variant B under the LRCP, including demolition of 198 McAllister Street and 50 Hyde Street, would not directly affect historic resources, and would not materially impair the significance of the Uptown Tenderloin and Civic Center historic districts, and would have a less-than-significant impact on historical resources.

Impact CR-2 Development under the LRCP could potentially damage contributors to the Uptown Tenderloin Historic District, and those listed in San Francisco Planning Code Article 11. ***Less than Significant with Mitigation***

Historical resources on the same block as the proposed building at 198 McAllister Street include the apartment/hotel building at 132–154 McAllister Street, adjacent to the east, and 255 Golden Gate Avenue, located approximately 35 feet north.[46] Construction activities associated with Variant A or Variant B would have the potential to adversely impact these historic buildings, which are contributors to the Uptown Tenderloin Historic District, and listed in San Francisco Planning Code Article 11. Construction-related effects from demolition, excavation, foundation, structure, and other activities such as vibration, could affect the historic buildings. MM-CR-1 would reduce this potentially significant impact on historic resources to a less-than-significant level.

MM-CR-1: Prepare a Historic Property Protection Plan in Conjunction with Demolition and Construction Plans for 198 McAllister Street or 50 Hyde Street

1a. A registered structural engineer, with a minimum of 5 years of experience in the rehabilitation and restoration of historic buildings, shall review excavation and shoring plans prepared for the proposed development, if such plans are required. The structural engineer shall prepare a report of findings, recommendations, and any related design

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[46] 50 United Nations Plaza and 200 Larkin Street are historical resources that are contributors to the Civic Center historic districts. Located across the street from 198 McAllister Street, these buildings would not potentially be affected from the demolition and construction activities associated with Variant A or B since both buildings received seismic upgrades recently. The renovation of 200 Larkin Street was completed in the late 1990s and 50 United Nations Plaza in 2013. U.S. General Services Administration, "50 United Nations Plaza Federal Office Building," Online: http://www.gsa.gov/portal/mediaId/181019/fileName/50_UNP_Fact_Sheet.action. Site visited on January 7, 2016; "San Francisco Asian Art Museum," DPR Construction Website. Online: http://www.dpr.com/projects/asian-art-museum. Site visited on January 7, 2016.

modifications necessary to retain the structural integrity of 132–154 McAllister Street and 255 Golden Gate Avenue during demolition, excavation, and construction activities. The structural engineer shall consult with a historical architect or architectural historian meeting the Secretary of the Interior's Professional Qualifications Standards for Historic Architecture.[47] The historical architect shall review designs and specifications for protective barriers required to protect the exposed walls of 132–154 McAllister Street from potential damage caused by construction activities. In addition, the structural engineer (with geotechnical consultation, as necessary) shall determine whether, due to the nature of the excavations, soils, method of soil removal, and the existing foundation of 132–154 McAllister Street, the potential for settlement would require underpinning and/or shoring. If underpinning and/or shoring is determined to be necessary, appropriate designs shall be prepared and owners of adjacent buildings need to consent. All documents prepared in accordance with this measure shall be reviewed and approved by a designated representative of UC Hastings upon recommendations from the structural engineer and historical architect.

1b. Prior to the start of Variant A or Variant B development, a historical architect and a structural engineer shall undertake an existing condition study of 132–154 McAllister Street and 255 Golden Gate Avenue. The purpose of the study would be to establish the baseline condition of the buildings prior to construction, including the location and extent of any visible cracks or spalls. The documentation shall take the form of written descriptions and photographs, and shall include those physical characteristics of the resources that convey their historic significance and that justify their inclusion on, or eligibility for inclusion on, the National Register, California Register, and local register. The documentation shall be reviewed and approved by a designated representative of UC Hastings.

The historical architect and structural engineer shall monitor 132–154 McAllister Street and 255 Golden Gate Avenue during construction and any changes to existing conditions would be reported, including, but not limited to, expansion of existing cracks, new spalls, or other exterior deterioration. Monitoring reports shall be submitted to the general contractor in charge of construction and a designated representative of UC Hastings on a periodic basis. The structural engineer shall consult with the historical architect, especially if any problems with character-defining features of a historic resource are discovered. If, in the opinion of the structural engineer in consultation with

[47] The minimum professional qualifications in historic architecture are a professional degree in architecture or a state license to practice architecture, plus one of the following:

1. At least 1 year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field; or
2. At least 1 year of full-time professional experience on historic preservation projects.

Such graduate study or experience shall include detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects.

the historical architect, substantial adverse impacts to historic resources related to construction activities are found during construction, the monitoring team shall inform the general contractor in charge of construction and a designated representative of UC Hastings. UC Hastings shall adhere to the monitoring team's recommendations for corrective measures, including halting construction in situations where construction activities would imminently endanger historic resources. UC Hastings shall establish the appropriate frequency of monitoring and reporting, which shall reflect the demolition and construction methods and schedule of LRCP projects. Site visit reports and documents associated with claims processing shall be provided to the general contractor in charge of construction and a designated representative of UC Hastings.

1c. A qualified geologist, or other professional with expertise in ground vibration and its effect on existing structures, shall prepare a study of the potential for vibrations caused by excavation and construction activities associated with the LRCP. Based on the results of the study, specifications regarding the restriction and monitoring of excavation shall be incorporated into the construction contract. If warranted by the method of construction, the structural engineer and geotechnical consultant shall determine threshold levels of vibration and cracking for 132-154 McAllister Street and 255 Golden Gate Avenue prior to construction, and if these are met or exceeded during construction monitoring, then construction techniques would be re-evaluated and altered prior to continuation to ensure that vibration levels would not disturb the historical resources. If there appear to be negative effects from the construction of the new building, the historical architect and structural engineer shall prepare and submit a report to the general contractor in charge of construction and a designated representative of UC Hastings. Damage attributable to construction activities shall be addressed through repair or replacement following the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

1d. The historical architect shall establish a training program for construction workers involved in the project that emphasizes the importance of protecting historic resources. This program shall include information on recognizing historic fabric and materials, and directions on how to exercise care when working around and operating equipment near the historic structures, including storage of materials away from historic buildings. It shall also include information on means to reduce vibrations from construction, and monitoring and reporting of any potential problems that could affect the historic resources in the area. A provision for establishing this training program shall be incorporated into the construction contract, and the construction contract provisions shall be reviewed and approved by the general contractor in charge of construction, by affidavit, and by a designated representative of UC Hastings.

Implementation of MM-CR-1 would avoid significant impacts caused by construction activities, and the impact would be less than significant.

Impact CR-3 Renovating and reconfiguring 100 McAllister Street could have a significant impact on historic architectural resources and would not adversely affect the character of the immediate surroundings on the adjacent Uptown Tenderloin and Civic Center Historic Districts. ***Less than Significant with Mitigation***

Constructed in 1929, the building at 100 McAllister Street currently contains 252 units of housing accommodating approximately 280 students. The development of new housing at 198 McAllister Street would allow UC Hastings to continue providing campus housing for its students while 100 McAllister Street is renovated.

UC Hastings has conducted reviews of various redevelopment scenarios for the Tower. One scenario would renovate the unfinished space on the 25th and 26th floors of the Tower as additional housing units to increase the total number of housing units from 252 to 260 units. Another scenario would redevelop all existing housing units into an average unit size of 275 sf to increase the total number of housing units to 350. Some of the lower floors of the Tower also house research, clinic, and fiscal and communications office space. UC Hastings currently plans to relocate the research centers and clinics to the 200 McAllister Street building to more efficiently utilize space and create additional sources of revenue at the 100 McAllister Street building in the released space.

UC Hastings anticipates that the renovation of 100 McAllister Street would maintain the character-defining features of the building's exterior and interior (including the lobby, dining room/fitness center, coffee shop/student lounge, mezzanine, and Sky Room). MM-CR-2, Implement the Secretary's Standards for Rehabilitation of Historic Buildings, would ensure that renovation of 100 McAllister Street would have a less-than-significant impact on historic resources. The renovation would not impair 100 McAllister Street as a contributing resource to the Uptown Tenderloin Historic District.

MM-CR-2: Implement the Secretary's Standards for Rehabilitation of Historic Buildings

UC Hastings shall ensure that renovation of the character-defining features of the 100 McAllister Street building's exterior and interior shall be consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards). By following the Secretary's Standards, the proposed changes "shall be considered as mitigated to an impact level of less than significant on the historic resource."[48]

UC Hastings is analyzing the best use for the Great Hall, and no program or architectural scheme has been defined for its renovation. As noted, the Great Hall does not retain its significance as an interior feature of 100 McAllister Street. Alteration and reuse of the Great Hall

[48] CEQA Guidelines Section 15064.5(b)(3).

significance as an interior feature of 100 McAllister Street. Alteration and reuse of the Great Hall would have a less-than-significant impact on historic resources. However, UC Hastings will consider, to the extent structurally and economically feasible and compatible with life safety requirements, incorporating distinctive features of the Great Hall as part of future renovation and reuse. These features include:

- the large architectural volume;
- the arched and oculus windows on east and west elevations, and the rose window; and
- the original entry sequence from McAllister Street and the church lobby

Impact CR-4 The project could cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. *Less than Significant with Mitigation*

The record search indicates that there are no known prehistoric archaeological resources within the UC Hastings campus. There is one known historic archaeological resource immediately adjacent to the campus, the Original Auxiliary Water Supply System built between 1908 and 1913, and is in adjacent streets. Although there are no known prehistoric or historic archaeological resources within the UC Hastings campus, there is the possibility for unknown historic or prehistoric resources to exist, which could be uncovered during ground-disturbing activities associated with the proposed project construction. With the implementation of MM-CR-3, Pre-construction Archaeological Testing, MM-CR-4, Worker Education Awareness, and MM-CR-5, Unanticipated Discoveries of Archaeological Resources, this impact would be reduced to a less-than-significant level.

MM-CR-3: Pre-construction Archaeological Testing

Prior to construction at LRCP development sites, UC Hastings shall implement a pre-construction archaeological testing program. The testing program will depend upon access to development sites after demolition of existing buildings. UC Hastings shall retain a qualified archaeological consultant to prepare an archaeological testing plan (ATP). The ATP shall identify the property types of the expected archaeological resource(s) that potentially could be adversely affected by the LRCP development, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing will be to determine, to the extent possible, the presence or absence of archaeological resources and to identify and evaluate whether any archaeological resource encountered on the site constitutes a historical resource under CEQA.

At the completion of the archaeological testing, the archaeological consultant shall submit a written report to UC Hastings. If based on the archaeological testing program, the archaeological consultant finds that significant archaeological resources may be present, UC Hastings—in consultation with the archaeological consultant—shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing and/or archaeological monitoring. In the event that archaeological resources are uncovered, UC Hastings shall implement MM-CR-5.

MM-CR-4: Worker Education Awareness

Prior to the initiation of construction or ground-disturbing activities, all contractor and subcontractor personnel shall receive training regarding the appropriate work practices necessary to effectively implement the mitigation measures that will ensure compliance with the applicable environmental laws and regulations, including the potential for exposing subsurface cultural resources and to recognize possible buried resources. Training shall inform all construction personnel of the anticipated procedures that would be followed upon the discovery or suspected discovery of archaeological materials, including Native American remains and their treatment, as well as any other cultural resources.

MM-CR-5: Unanticipated Discoveries of Archaeological Resources

In the unlikely event that archaeological resources are uncovered during construction, the find shall be secured and the project head foreman shall immediately notify UC Hastings, who will immediately contact a qualified archaeologist to determine the significance of the find. If the resource is deemed significant, additional work may be needed, an archaeological monitor may be necessary for the duration of ground-disturbing construction activities, and UC Hastings shall implement one of the following:

- Redesign the proposed LRCP development so as to avoid any adverse impact on the significant archaeological resource.
- Implement a Research Design and Data Recovery Program. The Research Design and Data Recovery Program shall include the following elements: field methods and procedures; cataloguing and laboratory analysis; discard and deaccession policy; interpretive program; security measures; final report; and curation.
- If UC Hastings and the archaeological consultant determine that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible, UC Hastings shall implement an interpretive program.

Impact CR-5 The project could disturb human remains, including those interred outside of formal cemeteries. ***Less than Significant with Mitigation***

There are no known formal cemeteries near the UC Hastings campus. No evidence of human remains was found in documentary research, and buried human remains are extremely unlikely to be present within the UC Hastings campus area. The record search did indicate that there was a partial burial located within 0.25 mile of the campus, found at a depth of approximately 75 feet. Unknown prehistoric burials may exist and may be uncovered during ground-disturbing activities associated with development under the LRCP. California law recognizes the need to protect interred human remains, particularly Native American burials and associated items of patrimony, from vandalism and inadvertent destruction. With the implementation of MM-CR-6, Unanticipated Discoveries of Human Remains, this impact would be reduced to a less-than-significant level.

MM-CR-6: Unanticipated Discoveries of Human Remains

In the unlikely event that human remains or potential human remains are uncovered during construction, the find shall be secured and the project head foreman shall immediately notify UC Hastings, who will immediately contact the San Francisco county coroner and suspend any ground-disturbing activities within 100 feet of the discovery until UC Hastings and/or a qualified archaeologist has determined what additional measures should be undertaken.

If the remains are human, the coroner and UC Hastings shall immediately implement the applicable state law, in Sections 5097.9 through 5097.996 of the Public Resources Code. If the remains of Native Americans are identified, the coroner shall notify the Native American Heritage Commission, according to California Health and Safety Code Section 7050.5(c). In addition, California Health and Safety Code Sections 8010-8021 and 8025-8030, provides for the repatriation of human remains and cultural items in the possession or control of a state or local agency or museum to the rightful California Native American tribe. This law defines the term California Native American tribe to include non-federally recognized groups.

Impact CR-6 The project could cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code Section 21074. ***Less than Significant with Mitigation***

Tribal cultural resources (TCRs) are resources that meet the definition found in Public Resources Code Section 21074. TCRs are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are also either (a) included or determined to be eligible for inclusion in the CRHR or (b) included in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k).

Pursuant to Assembly Bill 52, effective July 1, 2015, tribal entities—as indicated by the NAHC—have been notified of the 333 Golden Gate Avenue development and other LRCP elements. During the 30-day comment period, no Native American tribal representatives contacted UC Hastings to request consultation. Although there are no known prehistoric archaeological resources within the UC Hastings campus, it is possible that unknown prehistoric resources could be uncovered during ground-disturbing activities associated with the proposed LRCP development. Therefore, the potential adverse impacts on previously unidentified archeological resources, discussed under Impact CR-4, also represent a potentially significant impact on TCRs. Implementation of MM-CR-7, Tribal Cultural Resources Interpretive Program, would reduce potential adverse effects on TCRs to a less-than-significant level. MM-CR-7 would require either preservation-in-place of the TCRs, if determined effective and feasible, or an interpretive program regarding the TCRs developed in consultation with affiliated Native American tribal representatives.

MM-CR-7: Tribal Cultural Resources Interpretive Program

If UC Hastings determines that a significant archaeological resource is present, and if in consultation with the affiliated Native American tribal representatives, determines that the resource constitutes a tribal cultural resource (TCR) and could be adversely affected by LRCP development, the proposed LRCP development shall be redesigned so as to avoid any adverse impact on the TCR, if feasible.

If UC Hastings, in consultation with the affiliated Native American tribal representatives, determines that preservation-in-place of the TCR is not a sufficient or feasible option, UC Hastings shall implement an interpretive program in consultation with affiliated tribal representatives. An interpretive plan, produced in consultation with affiliated tribal representatives, would be required to guide the interpretive program. The plan shall identify, as appropriate, proposed locations for installations or displays, the proposed content and materials of the displays or installation, the producers or artists of the displays or installation, and a long-term maintenance program. The interpretive program may include artist installations, preferably by local Native American artists; oral histories with local Native Americans; artifact displays and interpretation; and educational panels or other informational displays.

4.3.3 Cumulative Impacts

Cumulative historic resources impacts would be significant if projects adversely affected resources in the adjacent Uptown Tenderloin and Civic Center Historic Districts such that a districts' ability to convey its significance would be impaired. Development under the LRCP would demolish two existing structures that are not historical resources; therefore, demolition of the existing buildings at 198 McAllister Street and at 50 Hyde Street, with Variant A or Variant B, would have no effect on historical resources. The new construction at 333 Golden

Gate Avenue would have no direct impact on historical resources because no buildings are located on the existing undeveloped lot.. New construction with the LRCP could have a different architectural character then the buildings in the historic districts, but the new buildings would not directly affect architectural resources within the districts, and would not impair the ability of the districts to convey their significance. While the buildings would be taller than the adjacent buildings and most nearby structures, they would be generally in scale with surrounding buildings and the neighborhood as a whole. Development under the LRCP would have a less-than-significant impact on the adjacent Uptown Tenderloin and Civic Center Historic Districts

Therefore, it is not anticipated that the LRCP, in combination with other past, present, and reasonably foreseeable future projects in the vicinity, would result in substantial adverse changes to the Uptown Tenderloin and Civic Center Historic Districts, and the cumulative impact on historical resources would be less than significant.

There are no known existing prehistoric or historic archaeological sites recorded within the UC Hastings campus, and the LRCP would include mitigation measures to avoid impacts should there be unanticipated discoveries of archaeological resources or human remains; therefore, there would be no cumulative impacts on these resources. There are no known tribal cultural resources within the UC Hastings campus vicinity, and thus, no cumulative impacts on these resources would occur.

4.4 GEOLOGY AND SOILS

This section describes the subsurface conditions on the UC Hastings campus, and the geological, soils, and seismicity characteristics of the surrounding area and region. This section identifies potential impacts that could occur as a result of subsurface activities, or due to ground shaking and liquefaction hazards. As noted in Chapter 3, Project Description, UC Hastings is a state entity, and is not subject to City and County of San Francisco jurisdiction. San Francisco General Plan policies related to environmental hazards, and other relevant city and county codes, are discussed for informational purposes. A site-specific geotechnical report was completed for the potential LRCP development site at 333 Golden Gate Avenue, and is discussed in the following sections.[1]

4.4.1 Setting

Subsurface Conditions

The UC Hastings campus and vicinity is in an area with varying subsurface conditions, and in a region prone to seismic events. Based on review of available geotechnical investigations for the campus and for sites in the immediate vicinity, it was determined that UC Hastings and the surrounding area are underlain by approximately 3 to 12 feet of fill material, varying by location. The fill consists mostly of loose sand with varying amounts of silt, and is also known to contain other debris, such as abandoned building materials. The fill is underlain by medium to very dense sand (Dune sand), with varying amounts of silt and clay to a depth of approximately 20 to 51 feet below ground surface (bgs), varying by location. The sand is generally loose to medium dense at the upper 5 to 15 feet, and medium dense to very dense below 15 feet bgs. Very stiff silt and clay layers are also known to occur at various locations in the upper 5 to 15 feet. In varying locations throughout the surrounding area, the Dune sand is known to be underlain by the Colma formation, which consists of dense to very dense sand with varying amounts of clay. This formation is also known to potentially contain paleontological resources. Ground water at the campus and in the surrounding vicinity is known to occur at approximately 15 to 20 feet bgs.

The western portion of the campus, including 333 Golden Gate Avenue and the UC Hastings Parking Garage, are also within a known Maher ordinance zone area. Article 22A of the San Francisco Health Code (commonly known as the Maher Ordinance) identifies and regulates ground-disturbing activities within Maher Zones, which are areas that are known to be situated on top of artificial fill material. These areas are generally characterized by sandy soils containing abandoned building materials, as described previously. Although UC Hastings is not subject to San Francisco ordinances, review of Maher Zone maps can assist in properly characterizing sub-surface conditions for sites located in a Maher Zone area. Refer to Section 5.8, Hazards and

[1] Geocon Consultants, Inc. 2016. *Preliminary Geotechnical Investigation, Proposed Hasting College of Law 333 Golden Gate Avenue, San Francisco, California*. January.

Hazardous Materials, of the Initial Study, included in Appendix A of this EIR, for further discussion regarding Maher Ordinance requirements.

Seismic Conditions

The San Francisco region, including the LRCP area, is a seismically active region as a result of active northwest trending strike-slip faulting associated with the San Andreas Fault system. The area is influenced by a number of regional faults, including the San Andreas, Hayward, Calaveras, San Gregorio, Concord, Point Reyes, and Rodgers Creek faults. The closest active fault to the LRCP area is the San Andreas Fault, with its nearest point located approximately 8.3 miles west of UC Hastings. According to the US Geological Survey (USGS), the overall probability of moment magnitude 6.7 or greater earthquake occurring in the San Francisco Bay region in the next 30 years is 72 percent.[2]

Liquefaction

Liquefaction is a phenomenon in which oversaturated and unconsolidated sediments and soils temporarily loose strength and act as a liquid due to agitation or a strong shaking motion, such as an earthquake. Liquefaction potential is highly variable throughout the San Francisco region, as there are varying topographical gradients, soil conditions, and saturation conditions throughout the area. The potential for liquefaction is greater in areas that contain artificial fill, as vibration can cause these soils to spread and experience liquefaction under conditions of saturation. The LRCP is located in a relatively flat area, containing potentially liquefiable soils as well as soils characterized as having very low liquefaction potential.

Regulatory Context

As previously stated, UC Hastings is not subject to City and County of San Francisco codes or jurisdiction. Two pieces of state legislation apply to construction near active faults, including the Alquist-Priolo Earthquake Fault Zoning Act,[3] effective in 1972, and the Seismic Hazards Mapping Act,[4] effective in 1991. The purpose of the Earthquake Fault Zoning Act is to reduce the hazards posed by surface rupture of a fault, and the purpose of the Seismic Hazards Mapping Act is to provide safeguards to the public from the effects of strong seismic ground shaking, liquefaction, or other ground failure.

The State of California also provides minimum standards for building design through the California Building Code (CBC). The CBC is based on the Uniform Building Code, with amendments for California conditions. Specifically, CBC Chapters 23, 29, 33, and 70 contain

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[2] USGS. 2015. *UCERF3: A New Earthquake Forecast for California's Complex Fault System.*

[3] Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code, Division 2. "Geology, Mines and Mining," Chapter 7.5 "Earthquake Fault Zones," Sections 2621 through 2630; signed into law December 22, 1972, amended 1994.

[4] Seismic Hazards Mapping Act, California Public Resources Code, Division 2. "Geology, Mines and Mining," Chapter 7.8, effective date April 1, 1991.

requirements and specifications regarding seismic safety, excavation, grading activities, and foundation design.

4.4.2 Impacts and Mitigation

Significance Criteria

The thresholds for determining the significance of impacts in this analysis are consistent with the environmental checklist in Appendix G of the CEQA Guidelines. The following impact analysis uses the criteria to evaluate whether implementation of the LRCP or alternatives would result in significant, adverse impacts. For the purposes of this analysis, topics relating to geology and soils that were determined to be not applicable, have no impacts, or that would have less-than-significant impacts with mitigation, were covered in the Initial Study. Those topics included potential impacts related to landslides; erosion and soil loss; the use of septic tanks, topography; and paleontological resources. Thus, for geology and soils, this analysis considers whether the LRCP would result in or be subject to any of the following:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Refer to Division of Mines and Geology Special Publication 42);
  - strong seismic ground shaking; or
  - seismic-related ground failure, including liquefaction.
- Be located on a geological unit or soils that are unstable, or would become unstable as a result of the project, and could potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse.
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property.

Methodology

The analysis presented in this section relies on a site-specific geotechnical investigation for the UC Hastings property at 333 Golden Gate Avenue, as well as relevant information obtained from available geotechnical investigation documents for other projects located on and in the immediate vicinity of the UC Hastings campus. Other available documents reviewed include a geotechnical investigation report completed for the UC Hastings Parking Garage in 2000[5] and a 2012 geotechnical report completed for a proposed development at 101 Hyde Street,[6] adjacent to the north of UC Hastings across Golden Gate Avenue. The geotechnical investigations consist of reviews of available literature and geologic maps for the area, subsurface investigations, laboratory testing, geotechnical data analysis, and characterization of the subsurface conditions in the area. In addition, the geotechnical reports provide preliminary foundation and design recommendations, which could be relevant to and adopted for LRCP developments, as similar conditions would be expected to be encountered at development sites.

In addition to available geotechnical investigations, California Geological Survey and Alquist-Priolo geologic hazard zone maps were reviewed to determine potential impacts due to strong seismic ground shaking and liquefaction.

Impacts

Impact GS-1 Development under the LRCP would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking or seismic-related ground failure, including liquefaction. ***Less-than-Significant Impact***

The UC Hastings area is not within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults exist on or in the immediate vicinity of the UC Hastings campus.[7] The nearest mapped active fault is the San Andreas Fault, with its nearest point approximately 8.3 miles west.[8] However, a major earthquake event on any of the Bay Area faults would be expected to result in strong seismic ground shaking on the UC Hastings campus, and throughout the surrounding region. The UC Hasting campus lies within an area that has liquefaction potential, as identified by the California Department of Conservation under the Seismic Hazards Mapping Act, and could experience the effects of liquefaction.[9]

333 Golden Gate Avenue Construction

Potential LRCP development of the proposed 333 Golden Gate Avenue academic building would be subject to strong seismic ground shaking in such an event; however, development of the building would not expose people or structures to substantial adverse effects because the building would be designed and constructed in accordance with the most current CBC requirements regarding seismic safety. Although UC Hastings is not subject to San Francisco

[5] Treadwell and Rollo. 2000. *Environmental Site Characterization, Hastings Property, Golden Gate Avenue and Larkin Street, San Francisco, California*. September.

[6] Rockridge Geotechnical. 2012. *Geotechnical Study, Proposed Mid-Rise Building, 101 Hyde Street, San Francisco, California*. September.

[7] State of California Department of Conservation. Alquist-Priolo Regulatory Maps. Online: http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm. Site visited on January 28, 2015.

[8] Geocon Consultants, Inc. 2016. *Preliminary Geotechnical Investigation, Proposed Hastings College of Law 333 Golden Gate Avenue, San Francisco, California*. January.

[9] California Department of Conservation, Division of Mines and Geology. 2000. State of California Seismic Hazard Zones, City and County of San Francisco, Official Map. November 17.

codes, the San Francisco Building Code (SFBC) also defines various seismic sources and incorporates calculations used to determine force exerted on structures during ground-shaking events. The SFBC also incorporates CBC requirements. SFBC criteria could be incorporated, as necessary, to ensure that development under the LRCP would not expose people or structures to adverse impacts due to ground shaking. A design-level geotechnical investigation would determine suitable calculation estimates for proposed LRCP design in accordance with the CBC.

As noted, the UC Hasting campus lies within an area that has liquefaction potential, and could experience the effects of liquefaction. According to the geotechnical investigation completed for 333 Golden Gate Avenue, potentially liquefiable sandy layers were encountered between 17 to 25 and 25 to 30 feet bgs, and it was determined that differential settlement due to liquefaction could range from approximately 0.5 inch to 1.0 inch over a distance of approximately 50 feet. The preliminary geotechnical investigation determined that the use of deep foundations would penetrate the fill material and potentially liquefiable soil and bear within the underlying dense native dune sands, and would alleviate potential liquefaction impacts. However, a design-level geotechnical investigation, in conjunction with specific CBC requirements, would provide specific design considerations sufficient to alleviate the adverse effects of liquefaction at the site.

According to the geotechnical investigation, due to the relatively flat gradient of the area, the potential for lateral spreading at the 333 Golden Gate Avenue site is considered low. Therefore, the potential for adverse impacts from seismic events or geologic hazards at 333 Golden Gate Avenue would be considered less than significant.

Other LRCP Development, including Variant A and Variant B, and 100 McAllister Street Renovation

Other potential LRCP development sites, including 198 McAllister Street and 50 Hyde Street, would be subject to the same effects of seismic ground shaking discussed for 333 Golden Gate Avenue, and would also incorporate the most current CBC design and construction requirements regarding seismic safety. This would reduce potential impacts to a less-than-significant level. Under the LRCP, the 100 McAllister Street Tower would also be retrofitted and improved to comply with the current applicable CBC seismic safety requirements.

Other potential LRCP development sites also lie within an area that has liquefaction potential and could be exposed to those effects. With the proximity of the 198 McAllister and 50 Hyde Street sites to the 333 Golden Gate Avenue site, it is anticipated that subsurface conditions regarding liquefaction potential would be similar. It is anticipated that these developments would incorporate the use of deep foundations to penetrate any fill material and potentially liquefiable soil, and bear within the underlying dense native dune sands, thus alleviating potential liquefaction impacts. However, those potential future developments would undergo site-specific design-level geotechnical investigations in conjunction with specific CBC requirements at the time of their development to determine design considerations to address the adverse effects of liquefaction.

As with the 333 Golden Gate Avenue property, other potential LRCP development sites are on relatively flat gradients and the potential for lateral spreading would be considered low. Therefore, potential adverse impacts from seismic events or geologic hazards on other LRCP development sites would be considered less than significant.

Impact GS-2 Development under the LRCP would not be located on geologic units or soils that are unstable or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. ***Less-than-Significant Impact***

UC Hastings is in a generally flat area of San Francisco and is not listed as a landslide-prone area, and thus, would not be subject to landslides. Potential development with the LRCP may result in ground settlement from excavations during construction and from construction dewatering.

333 Golden Gate Avenue Construction

The academic building at 333 Golden Gate Avenue may include a basement extending up to two levels below grade. Based on the geotechnical investigation completed for 333 Golden Gate Avenue, the site is underlain by a maximum of approximately 15 feet of fill material, with dense Dune sands located beneath that, down to approximately 51 feet bgs. According to the geotechnical investigation, groundwater at 333 Golden Gate Avenue was encountered at approximately 20 feet bgs, and is known to occur as shallow as 15 feet bgs in the immediate vicinity of the campus.

Basement excavation to 20 feet bgs or below would reach the dense Dune sand, which is known to be stable and suitable for foundations. It is anticipated that groundwater would be encountered if excavation of the site were necessary to 20 feet bgs or below, and would require dewatering activities. If required, dewatering would only occur for a short time during the construction period, and would not cause settlement or cause soils to become unstable.

The preliminary geotechnical investigation concluded that shoring or underpinning of excavation walls and adjacent structures may be necessary to prevent caving. If shoring or underpinning were necessary, it would be done in accordance with CBC requirements, ensuring that localized soils would not become unstable. Operation of the academic building would not affect groundwater or soil saturation characteristics. Construction and operation of 333 Golden Gate Avenue would have less-than-significant impacts related to soil conditions.

Other LRCP Development, including Variant A and Variant B

Development at other LRCP sites would be expected to encounter similar conditions as 333 Golden Gate Avenue, including potentially requiring dewatering if excavations were necessary to 20 feet or more bgs. 198 McAllister Street and 50 Hyde Street are currently developed with existing structures that have foundations extending to stable and suitable soils. Similar to development at 333 Golden Gate Avenue, potential development at these UC Hastings sites would be expected to include excavation that would reach dense Dune sand that is suitable for foundations.

Design-level geotechnical analysis that incorporates CBC criteria would ensure that considerations are made so that other potential LRCP developments are not located on unstable soils and that construction activities do not cause soils to become unstable. Operation of other LRCP development would not affect groundwater or soil saturation characteristics. Construction and operation of other LRCP development would have less-than-significant impacts related to soil conditions.

Impact GS-3 Development under the LRCP would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property. ***Less-than-Significant Impact***

Expansive soils expand and contract in response to changes in soil moisture, most notably when near-surface soils change from saturated to a low-moisture content condition, and back again. The presence of expansive soils would be determined during site-specific geotechnical investigations.

333 Golden Gate Avenue Construction

Based on the site-specific geotechnical investigation, expansive soils were determined not to be present underlying the 333 Golden Gate Avenue site. Potential excavation of a two-level basement would be expected to remove the existing fill materials at that site, leaving the underlying Dune sands. Due to the low clay content of Dune sands, those soils would have a low likelihood for expansion. Furthermore, urban built-out areas are generally less susceptible to the effects of expansive soils. Conformance with applicable CBC building requirements would avoid adverse impacts related to expansive soils, and therefore, impacts related to expansive soils would be less than significant.

Other LRCP Development, Including Variant A and Variant B

The presence of expansive soils underlying other potential LRCP development sites, including 198 McAllister Street and 50 Hyde Street, would be determined during site-specific geotechnical investigations at the time of those developments. However, subsurface conditions would be expected to be similar to those at 333 Golden Gate Avenue. Excavation would be expected to remove the existing fill materials, leaving the underlying Dune sands. Conformance with applicable CBC building requirements would avoid adverse impacts related to expansive soils, and therefore, impacts at other LRCP development sites related to soil conditions would be less than significant.

4.4.3 Cumulative Impacts

Geologic impacts are usually site specific, and LRCP development, including 333 Golden Gate Avenue and other future development at UC Hastings, would have no potential to contribute to cumulative effects with other projects. Cumulative development would be subject to the same California Building Code standards, requirements, and design reviews as with LRCP projects, and could also be subject to City and County of San Francisco codes and standards. These requirements would reduce the geology- and soils-related effects of cumulative projects to less-than-significant-levels.

For these reasons, development under the LRCP, in conjunction with other past, present, and reasonably foreseeable future projects, would not result in cumulatively significant geology and soils impacts.

4.5 GREENHOUSE GAS EMISSIONS

This section describes how the proposed LRCP would affect regional GHG emissions. The analysis presented in this study assesses project GHG emissions and consistency with applicable local and regional GHG-reduction plans.

4.5.1 Setting

GHG emissions refer to a group of emissions that are generally believed to affect global climate conditions. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), keep the average surface temperature of the Earth close to 60 °F. Without the natural greenhouse effect, the Earth's surface would be about 61°F cooler.[1]

In addition to CO_2, CH_4, and N_2O, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon (black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher global warming potential than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO_2, denoted as CO_2e. CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Table 4.5-1, Global Warming Potential for Various Greenhouse Gases, shows various GWP.

Table 4.5-1: Global Warming Potential for Various Greenhouse Gases

Pollutant	Lifetime (Years)	Global Warming Potential (20-Year)	Global Warming Potential (100-Year)
Carbon Dioxide	100	1	1
Nitrous Oxide	121	264	265
Nitrogen Trifluoride	500	12,800	16,100
Sulfur Hexafluoride	3,200	17,500	23,500
Perfluorocarbons	3,000-50,000	5,000-8,000	7,000-11,000
Black Carbon	days to weeks	270-6,200	100-1,700
Methane	12	84	28
Hydrofluorocarbons	Uncertain	100-11,000	100-12,000
Source: California Air Resources Board 2014. First Update to the Climate Change Scoping Plan			

[1] California Environmental Protection Agency Climate Action Team. 2006. *Climate Action Report to Governor Schwarzenegger and the California Legislator.* March.

Regulations

International

United Nations Framework Convention on Climate Change Conference of the Parties 21

In November and December 2015, representatives of developed and developing nations gathered in Paris at the 21st session of the Conference of the Parties, also known as the 2015 Paris Climate Change Conference, to further discuss an international strategy to reduce the effects of climate change—such as sea level rise, global warming, and extreme weather events—by reducing, monitoring, and reporting emissions. Commitments were made to develop Nationally Determined Contributions designed to limit global warming below 2 degrees Celsius by establishing clear standards.[2]

The last two climate conferences in Warsaw (2013) and Lima (2014) decided that countries were to submit their proposed emissions-reduction targets for the 2015 conference as "intended nationally determined contributions" prior to the Paris conference. The European Union has committed to an economy-wide, domestic GHG-reduction target of 40 percent below 1990 level by 2030. The United States has set its intended nationally determined contribution to reduce its GHG emissions by 26 to 28 percent below its 2005 level in 2025 and to make best efforts to reduce its emissions by 28 percent. These targets are set with the goal of limiting global temperature rise to well below 2 degrees Celsius and getting to the 80 percent emission reduction by 2050

U.S.-China Climate Agreement

In November 2014, the United States (U.S.) and China made a joint announcement to cooperate on combatting climate change and promoting clean energy. In the U.S., President Obama announced a climate target to reduce GHG emissions by 26 to 28 percent below 2005 levels by 2025. In China, President Xi Jinping announced a climate target to reduce peak CO_2 emissions by 2030 and to increase the renewable energy share across all sectors to 20 percent by 2030. China will need to build an additional 800 to 1,000 gigawatts of nuclear, wind, solar, and other zero-emission generation capacity by 2030 to reach this target. Together, the United States and China have agreed to: expand joint clean energy research and development at the U.S.-China Clean Energy Research Center, advance major carbon capture, provide use and storage demonstrations, enhance cooperation on HFCs, launch a climate-smart/low-carbon cities initiative, promote trade in green goods, and demonstrate clean energy on the ground.

Federal

In December 2009, the EPA Administrator signed two distinct findings regarding GHG under Section 202(a) of the CAA. The Endangerment Finding found that the current and projected

[2] C2ES. 2015. Outcomes of the UN Conference on Climate Change in Paris. December. Online: http://www.c2es.org/docUploads/cop-21-paris-summary-02-2016-final.pdf. Site visited on March 2, 2016.

concentrations of the six key GHGs (i.e., CO_2, CH_4, NO_2, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations. The Cause or Contribute Finding found that the combined emissions of these GHGs from new motor vehicles and motor vehicle engines contribute to the GHG pollution that threatens public health and welfare. These findings were necessary prerequisites for implementing GHG-emissions standards for vehicles. In collaboration with the National Highway Traffic Safety Administration, the EPA finalized emissions standards for light-duty vehicles (2012–2016 model years) in May 2010 and heavy-duty vehicles (2014–2018 model years) in August 2011.

State

California's Energy Efficiency Standards for Residential and Nonresidential Buildings

Located in Title 24, Part 6 of the Code of California Regulations and commonly referred to as "Title 24," these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The goal of Title 24 energy standards is the reduction of energy use. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficiency technologies and methods.[3] On May 31, 2012, the California Energy Commission (CEC) adopted the 2013 Building and Energy Efficiency Standards. Buildings that are constructed in accordance with the 2013 Building and Energy Efficiency Standards are 25 percent (residential) to 30 percent (nonresidential) more energy efficient than the 2008 standards as a result of better windows, insulation, lighting, ventilation systems, and other features that reduce energy consumption in homes and businesses.

Executive Order S-3-05

On June 1, 2005, Executive Order (E.O.) S-3-05 set the following GHG emission-reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The E.O. establishes state GHG emission targets of 1990 levels by 2020 and 80 percent below 1990 levels by 2050. It calls for the Secretary of California Environmental Protection Agency (Cal/EPA) to be responsible for coordination of state agencies and progress reporting. A recent CEC Report concludes, however, that the primary strategies to achieve this target should be major decarbonization of electricity supplies and fuels, and major improvements in energy efficiency.

In response to the E.O., the Secretary of the Cal/EPA created the Climate Action Team (CAT). California's CAT originated as a coordinating council organized by the Secretary for Environmental Protection. It included the Secretaries of the Natural Resources Agency, Department of Food and Agriculture, and Chairs of the CARB, Energy Commission, and Public Utilities Commission. The original council was an informal collaboration between the agencies

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[3] California Energy Commission. 2015. California's Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations. Online: http://www.energy.ca.gov/title24. Site visited on December 16, 2015.

to develop potential mechanisms for reductions in GHG emissions in the state. The council was given formal recognition in E.O. S-3-05 and became the CAT.

The original mandate for the CAT was to develop proposed measures to meet the emission-reduction targets set forth in the E.O. The CAT has since expanded and currently has members from 18 state agencies and departments. The CAT also has 10 working groups, which coordinate policies among their members.

The working groups and their major areas of focus are as follows:

- Agriculture: Focusing on opportunities for agriculture to reduce GHG emissions through efficiency improvements and alternative energy projects, while adapting agricultural systems to climate change
- Biodiversity: Designing policies to protect species and natural habitats from the effects of climate change
- Energy: Reducing GHG emissions through extensive energy-efficiency policies and renewable-energy generation
- Forestry: Coupling GHG mitigation efforts with climate change adaptation related to forest preservation and resilience, waste-to-energy programs and forest offset protocols
- Land Use and Infrastructure: Linking land use and infrastructure planning to efforts to reduce GHG from vehicles and adaptation to changing climatic conditions
- Oceans and Coastal: Evaluating the effects of sea-level rise and changes in coastal storm patterns on human and natural systems in California
- Public Health: Evaluating the effects of GHG mitigation policies on public health and adapting public health systems to cope with changing climatic conditions
- Research: Coordinating research concerning impacts of and responses to climate change in California
- State Government: Evaluating and implementing strategies to reduce GHG emissions resulting from state government operations
- Water: Reducing GHG impacts associated with the state's water systems and exploring strategies to protect water distribution and flood protection infrastructure

Assembly Bill 32

In September 2006, the California Global Warming Solutions Act of 2006, also known as AB 32, was signed into law. AB 32 focuses on reducing GHG emissions in California and requires the CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. The CARB initially determined that the total statewide aggregated GHG 1990 emissions level and 2020 emissions limit was 427 million metric tons of CO_2e. The 2020 target reduction was estimated to be 174 million metric tons of CO_2e.

To achieve the goal, AB 32 mandates that the CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations would affect many existing sources of GHG emissions and not just new general development projects. SB 1368, a companion bill to AB 32, requires the California Public Utilities Commission and the CEC to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

AB 32 charges the CARB with the responsibility to monitor and regulate sources of GHG emissions to reduce those emissions. On June 1, 2007, the CARB adopted three discrete early-action measures to reduce GHG emissions. These measures involved complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[4] On October 25, 2007, the CARB tripled the set of previously approved early-action measures. The approved measures include improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFC emissions from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing SF_6 emissions from the non-electricity sector.

The CARB AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by the CARB with input from the CAT and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the state economy. The GHG-reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

Key approaches for reducing GHG emissions to 1990 levels by 2020 include the following:

- Expanding and strengthening existing energy-efficiency programs as well as building and appliance standards
- Achieving a statewide renewable electricity standard of 33 percent

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[4] CARB. 2007. *Proposed Early Action Measures to Mitigate Climate Change in California*. April 20.

- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system
- Establishing targets for transportation-related GHG emissions for regions throughout the state, and pursuing policies and incentives to achieve those targets
- Adopting and implementing measures to reduce transportation sector emissions

The CARB has adopted the First Update to the Climate Change Scoping Plan.[5] This update identifies the next steps for California's leadership on climate change. The first update to the initial AB 32 Scoping Plan describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the state as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020. Specifically, the update covers a range of topics, including the following:

- An update of the latest scientific findings related to climate change and its impacts, including short-lived climate pollutants
- A review of progress-to-date, including an update of Scoping Plan measures and other state, federal, and local efforts to reduce GHG emissions in California
- Potential technologically feasible and cost-effective actions to further reduce GHG emissions by 2020
- Recommendations for establishing a mid-term emissions limit that aligns with the state's long-term goal of an emissions limit of 80 percent below 1990 levels by 2050
- Sector-specific discussions covering issues, technologies, needs, and ongoing state activities to significantly reduce emissions throughout California's economy through 2050

As discussed previously, in December 2007, the CARB approved a total statewide GHG 1990 emissions level and 2020 emissions limit of 427 million metric tons of CO_2e. As part of the update, the CARB is proposing to revise the 2020 statewide limit to 431 million metric tons of CO_2e, an approximately 1 percent increase from the original estimate. The 2020 business-as-usual forecast in the update is 509 million metric tons of CO_2e. The state would need to reduce those emissions by 15 percent to meet the 431 million metric tons of CO_2e 2020 limit.

Senate Bill 375

SB 375, adopted on September 30, 2008, provides a means for achieving AB 32 goals through the reduction in emissions by cars and light trucks. SB 375 requires Regional Transportation Plans (RTPs) prepared by metropolitan planning organizations (MPOs) to include Sustainable

[5] CARB. 2014. *First Update to the Climate Change Scoping Plan: Building on the Framework*. May.

Communities Strategies (SCS). In adopting SB 375, the Legislature found that improved coordination between land use planning and transportation planning is needed to achieve the GHG emissions reduction target of AB 32. Further, the staff analysis for the bill prepared for the Senate Transportation and Housing Committee's August 29, 2008 hearing on SB 375 stated that the bill would help implement AB 32 by aligning planning for housing, land use, transportation, and GHG emissions for the 17 MPOs in the state.

Senate Bill 743

SB 743, effective on January 1, 2014, added Section 21099 to the California Public Resources Code. The legislation encourages land use and transportation planning decisions and investments that reduce vehicle miles traveled that contribute to GHG emissions, as required by AB 32. Key provisions of SB 743 include reforming aesthetics and parking; CEQA analysis for urban infill projects; and eliminating the measurement of auto delay, including level of service, as a metric that can be used for measuring traffic impacts in transit priority areas. SB 743 requires the State Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the reduction of GHG emissions, development of multimodal transportation networks, and a diversity of land uses. It also allows the OPR to develop alternative metrics outside of transit priority areas.

The proposed LRCP meets each of the Section 21099 criteria for infill projects in transit priority areas. Section 4.8, Transportation, addresses traffic impacts with metrics consistent with SB 743 provisions.

California Green Building Code

The California Green Building Code (CALGreen), is the first statewide green building code. It was developed to provide a consistent approach for green building within California. CALGreen lays out minimum requirements for newly constructed buildings in California, which will reduce GHG emissions through improved efficiency and process improvements. It requires builders to install plumbing that cuts indoor water use by as much as 20 percent, to divert 50 percent of construction waste from landfills to recycling, and to use low-pollutant paints, carpets, and floors.

California Environmental Quality Act Guidelines Amendments

SB 97 required the Governor's OPR to develop CEQA Guidelines "for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions." The CEQA Guidelines amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in CEQA documents.

Noteworthy revisions to the CEQA Guidelines include the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting.
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable.
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds.
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation.
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis.
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

California Air Resources Board Guidance

The CARB published draft guidance for setting interim GHG significance thresholds (October 24, 2008). The guidance does not attempt to address every type of project that may be subject to CEQA but instead focuses on common project types that are responsible for substantial GHG emissions, such as industrial, residential, and commercial projects. The CARB believes that thresholds in these important sectors will advance climate objectives, streamline project review, and encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state.

Executive Order B-30-15

On April 29, 2015, Governor Brown issued E.O. B-30-15, stating a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. The E.O. establishes GHG emissions reduction targets to reduce emissions to 80 percent below 1990 levels by 2050 and sets an interim target of emissions reductions for 2030 as being necessary to guide regulatory policy and investments in California and put California on the most cost-effective path for long-term emissions reductions. The E.O. orders "all state agencies with jurisdiction over sources of [GHG] emissions [to] ... implement measures, pursuant to statutory authority, to achieve reductions of [GHG] emissions to meet the 2030 and 2050 [GHG] emissions reductions targets." It directs the CARB to "update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent." It directs the Natural Resources

Agency to update "Safeguarding California" (the state's climate adaptation strategy) every 3 years, as specified; directs state agencies to "take climate change into account in their planning and investment decisions, and employ full lifecycle cost accounting to evaluate and compare infrastructure investments and alternatives;" and orders the "State's Five-Year Infrastructure Plan [to] take current and future climate change impacts into account in all infrastructure projects." Upon invitation from the State Planning Office, UC Hastings contributed to the state's 2016–2021 Five Year Infrastructure Plan:

UC Hastings is poised to leverage its legacy, intellectual capital, and trajectory as an institution of social justice to meet the challenges of a changing climate. The College's commitment will be evidenced in meeting or exceeding the emissions reduction and efficiency targets mandated by Governor Brown's executive orders through a community-based adaptive management system that restructures our campus culture upon principles of sustainability, and our built campus as an emblem of environmental justice.[6]

Among its other directives, the E.O. provides that "state agencies' planning and investment shall be guided by the ... principle that priority should be given to actions that both build climate preparedness and reduce GHG emissions."

Regional

Bay Area Air Quality Management District

The BAAQMD's most recent air quality plan, the 2010 Clean Air Plan, includes a goal of reducing GHG emissions to 1990 levels by 2020 and 40 percent below 1990 levels by 2035.[7] In addition, the BAAQMD established a climate protection program to reduce pollutants that contribute to global climate change; the program includes GHG-reduction measures that promote energy efficiency, reduce vehicle miles traveled, and develop alternative energy sources.[8]

The BAAQMD also assists lead agencies in complying with the requirements of CEQA regarding potentially adverse impacts to air quality in their CEQA Air Quality Guidelines. The BAAQMD advises lead agencies to consider adopting a Greenhouse Gas Reduction Strategy capable of meeting AB 32 goals and then reviewing projects for compliance with the Greenhouse Gas Reduction Strategy as a CEQA threshold of significance.[12] This is consistent with the approach to analyzing GHG emissions in the CEQA Guidelines Section 15183.5.

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[6] UC Hastings Agency Statement. 2015. *Climate Adaptation in the 2016 California Five-Year Plan*. October.

[7] BAAQMD. 2010. *Multi-Pollutant Clean Air Plan*. September.

[8] BAAQMD. Climate Protection Program. Online: http://www.baaqmd.gov/?sc_itemid=83004271-3753-4519-8B09-D85F3FC7AE70. Site visited on December 9, 2015.

Metropolitan Transportation Commission/Association of Bay Area Governments

The Metropolitan Transportation Commission and Association of Bay Area Governments (ABAG) Executive Boards jointly approved Plan Bay Area, which includes the region's SCS and 2040 RTP. Plan Bay Area is an integrated long-range transportation and land-use/housing plan that supports a growing economy, provides more housing and transportation choices, and reduces transportation-related pollution in the San Francisco Bay Area. With the region's population expected to grow from approximately 7 million in 2011 to approximately 9 million in 2040, Plan Bay Area concluded that it is critical to make transportation, housing, and land-use decisions now to sustain the San Francisco Bay Area's quality of life.

Plan Bay Area addresses SB 375, which requires reductions in GHG emissions from cars and light trucks. The mechanism for achieving these reductions is an SCS that promotes compact, mixed-use commercial and residential development that is walkable and bikeable, and close to mass transit, jobs, schools, shopping, parks, recreation, and other amenities. Plan Bay Area contains goals, policies, and objectives that encourage more transportation choices, create more livable communities, and reduce the pollution that contributes to climate change.

Local

No local regulations are applicable to the LRCP. UC Hastings is not required to comply with San Francisco GHG regulations and policies. The LRCP is in alignment and comity with University of California Guidelines, "Bending the Curve, 2015."[9]

UCSF prepared a GHG reduction strategy in conjunction with its 2014 Long Range Development Plan (LRDP) to ensure that the LRDP is implemented in alignment with the UC Sustainable Practices Policy, particularly the directives on GHGs, and to fulfill the GHG reduction requirements of AB 32. The UCSF Greenhouse Gas Reduction Strategy accomplishes the following:

- Consolidates GHG reduction efforts already underway and planned by UCSF over the life of the LRDP (through 2035)
- Reflects and reinforces the policy direction regarding GHG reduction provided in the UCSF Climate Action Plan (2009)
- Quantifies the impact on GHG emissions of projected land use, as represented by the LRDP
- Creates a framework for the ongoing monitoring and revision of the UCSF Greenhouse Gas Reduction Strategy

[9] University of California. 2015 Bending the Curve. Online: http://uc-carbonneutralitysummit2015.ucsd.edu/_files/Bending-the-Curve.pdf. Site visited on March 21, 2016.

- Helps streamline CEQA review of future campus development projects as consistent with the LRDP growth projections and the GHG reduction policies and programs contained in this document

4.5.2 Impacts and Mitigation

Significance Criteria

The proposed LRCP would have a significant air quality impact if it were to:

- generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or
- conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG.

California air pollution control officials and air quality districts have made several proposals for numerical thresholds. Multiple agencies' efforts at framing GHG significance issues have not yet coalesced into any widely accepted set of numerical significance thresholds for transit projects. The State CEQA Guidelines authorize the Lead Agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the Lead Agency to adopt such thresholds is supported by substantial evidence (State CEQA Guidelines Sections 15064.4[a] and 15064.7[c]). UC Hastings, based on guidance published by the BAAQMD, has established that the proposed project would result in a significant GHG impact if it were to generate emissions that exceed 4.6 MT CO_2e per service population threshold.[10]

Therefore, a significant impact would occur if:

- per capita GHG emissions would exceed 4.6 metric tons per year per service population (residents and nonresidents): or
- the LCRP would be inconsistent with GHG reduction plans, including AB 32 and Plan Bay Area.

Methodology

Quantification of GHG emissions for both construction and operations of the proposed projects was conducted using the CalEEMod model (version 2013.2.2) developed for the California Air Pollution Control Officers Association. CalEEMod is a statewide land-use emissions computer model designed to provide a uniform platform for government agencies, land-use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions

[10] Bay Area Air Quality Management District. 2010. *California Environmental Quality Act Air Quality Guidelines*. May.

associated with both construction and operations from a variety of land-use projects. CalEEMod is based upon CARB-approved Off-Road and On-Road Mobile-Source Emission Factor models, and is designed to estimate construction and operational emissions for land use development projects. CalEEMod utilizes widely accepted models for emission estimates combined with appropriate default data that can be used if site-specific information is not available.

Impacts

The following climate change analysis focuses on evaluating the potential significant impacts related to generation of GHG emissions by the proposed LRCP development projects.

Impact GG-1 The project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. ***Less-than-Significant Impact***

The following analysis quantifies GHG emissions and compares them to the regional significance threshold established by the BAAQMD.

333 Golden Gate Avenue Construction

The new academic building at 333 Golden Gate Avenue would replace all academic programming and faculty offices currently in Snodgrass Hall at 198 McAllister Street. Snodgrass Hall would remain vacant until implementation of the LCRP, which is analyzed in detail in the following paragraphs. The development of 333 Golden Gate Avenue would not result in additional staff or students. There would be no potential or increased mobile-source emissions. The new building would be approximately 19,000 sf smaller than Snodgrass Hall, and would be constructed to meet current Title 24 energy efficiency standards. There would be minimal potential for increased GHG emissions related to energy use or other area sources (e.g., solid waste disposal). Therefore, construction of 333 Golden Gate Avenue would result in a less-than-significant impact related to GHG emissions.

The BAAQMD's CEQA Guidelines do not identify a quantitative GHG emission threshold for construction emissions. Instead, the BAAQMD recommends that GHG emissions from construction be quantified and disclosed, and that a determination regarding the significance of these GHG emissions be made with respect to whether a project is consistent with the AB 32 GHG emission-reduction goals. The analysis of consistency with GHG reduction plans is provided in Impact GG-2.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

GHG emissions were estimated using CalEEMod. It is anticipated that Variant A would increase average daily vehicle trips from 615 to 806. Additional GHG emissions would be related to electricity, energy associated with water use, natural gas consumption, and solid waste decomposition. The potential GHG impact was assessed based on 4.6 metric tons of CO_2e

per year per service population (residents and employees). The service population for Variant A would include 978 residents and 918 nonresidents, totaling 1,896. Table 4.5-2, Per Capita Greenhouse Gas Emissions – Variant A, presents per capita emissions associated with Variant A. The estimated 0.9 metric ton of CO_2e per year per service population would be less than the 4.6 metric tons of CO_2e per year per service population significance threshold. The service population is defined as residents and nonresidents (i.e., employees for each building), and for the LRCP, was derived from the UC Hastings LRCP Draft Travel Demand Study by Fehr & Peers (December 2015). Therefore, Variant A would result in a less-than-significant impact related to GHG emissions.

As discussed previously, construction emissions are discussed in terms of consistency with the AB 32 GHG emission-reduction goals. The analysis of consistency with GHG reduction plans is provided in Impact GG-2.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

It is anticipated that Variant B would increase average daily vehicle trips from 615 to 860. No new parking would be accommodated. The service population for Variant B would include 1,148 residents and 918 nonresidents, totaling 2,066. Table 4.5-3, Per Capita Greenhouse Gas Emissions – Variant B, presents per capita emissions associated with Variant B. The estimated 0.8 metric ton of CO_2e per year per service population would be less than the 4.6 metric tons of CO_2e per year per service population significance threshold. Therefore, Variant B would result in a less-than-significant impact related to GHG emissions.

As mentioned previously, construction emissions are discussed in terms of consistency with the AB 32 GHG emission-reduction goals. The analysis of consistency with GHG reduction plans is provided in Impact GG-2.

100 McAllister Street Renovation

Renovating 100 McAllister Street to include additional residential units would lead to a decrease in daily external vehicle trips. More students would walk to campus instead of driving, which would decrease pollutant emissions. There would be minimal potential for 100 McAllister Street to generate additional GHG emissions, because any expanded public uses would be planned based upon availability of mass transit and the commitment to refrain from supplying additional parking.

Table 4.5-2: Per Capita Greenhouse Gas Emissions – Variant A

LRCP Project	Metric Tons Per Year of GHG Emissions
333 Golden Gate Avenue	
Mobile Sources	83
Area Sources	<1
Energy Use	134
Waste	32
Water Cycle	1
Subtotal	250
198 McAllister Street	
Mobile Sources	176
Area Sources	7
Energy Use	363
Waste	126
Water Cycle	59
Subtotal	730
50 Hyde Street	
Mobile Sources	83
Area Sources	<1
Energy Use	143
Waste	26
Water Cycle	1
Subtotal	253
100 McAllister Street	
Mobile Sources	47
Area Sources	4
Energy Use	212
Waste	73
Water Cycle	35
Subtotal	371
Total Emissions	1,604
Service Population (Residents and Nonresidents)	1,896
Annual Per Capita Emissions	0.9
BAAQMD Significance Threshold	4.6
Exceeds Threshold?	No
Source: CARB, CalEEMod version 2013.2.2, and Terry A. Hayes Associates Inc., 2015	

Table 4.5-3: Per Capita Greenhouse Gas Emissions –Variant B

LRCP Project	Metric Tons Per Year of GHG Emissions
333 Golden Gate Avenue	
Mobile Sources	83
Area Sources	<1
Energy Use	134
Waste	32
Water Cycle	1
Subtotal	250
198 McAllister Street and 50 Hyde Street	
Mobile Sources	225
Area Sources	10
Energy Use	465
Waste	161
Water Cycle	76
Subtotal	937
100 McAllister Street	
Mobile Sources	47
Area Sources	4
Energy Use	212
Waste	73
Water Cycle	35
Subtotal	371
Total Emissions	1,558
Service Population (Residents and Nonresidents)	2,066
Annual Per Capita Emissions	0.8
BAAQMD Significance Threshold	4.6
Exceeds Threshold?	No
Source: CARB, CalEEMod version 2013.2.2, and Terry A. Hayes Associates Inc., 2015	

Impact GG-2 The project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. ***Less-than-Significant Impact***

Two plans have been adopted for the purposes of reducing GHG emissions that are relevant to the LRCP: the AB 32 Scoping Plan and ABAG's Plan Bay Area. The following analysis applies to the replacement academic building at 333 Golden Gate Avenue, Variant A, Variant B, and 100 McAllister Street.

The AB 32 Scoping Plan

The AB 32 Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions, including: (1) expanding energy efficiency programs, (2) increasing electricity production from renewable resources to at least 33 percent of the statewide electricity mix, (3) increasing automobile efficiency, (4) implementing the Low Carbon Fuel Standard, and (5) developing the Cap-and-Trade Program. The vast majority of GHG emissions would result from mobile sources and energy. Multiple AB 32 Scoping Plan measures address GHG emissions from transportation fuels and energy. For example, the Cap-and-Trade Program, through the regulation of upstream electricity producers and fuel suppliers, would account for GHG emissions from the project and require emissions from covered sectors to be reduced by the amount needed to achieve AB 32's 2020 goal. Likewise, the Low Carbon Fuel Standard requires a 10 percent reduction in the carbon intensity of transportation fuels by 2020 and, therefore, creates incentives for broader-scale deployment of alternative vehicle fuels, including electricity. Similarly, the state's Renewable Portfolio Standard mandates that the state's utilities dramatically increase (to 33 percent by 2020) the percentage of electricity sales that are generated by eligible renewable generation sources. Together, these elements of the AB 32 Scoping Plan will ensure that overall statewide emissions will be decreased to the extent necessary to achieve AB 32's emissions reduction goals. The LRCP would not impede implementation of any of these elements. Moreover, emissions from the LRCP development projects would not exceed the BAAQMD thresholds, which are based on consistency with the AB 32 reduction target. Therefore, the LRCP development projects would have a less-than-significant impact on consistency with the AB 32 Scoping Plan.

Plan Bay Area

Plan Bay Area is an integrated long-range transportation and land-use/housing plan that supports a growing economy, provides more housing and transportation choices, and reduces transportation-related pollution in the San Francisco Bay Area. Performance targets identified in Plan Bay Area that are applicable to the proposed project include reducing per-capita GHG emissions from cars and light-duty trucks and decreasing per-capita automobile vehicle miles traveled (VMT). The LRCP would reduce per capita VMT by providing additional housing on campus. Residents of campus housing would be able to walk to school instead of commuting from off campus. This would be consistent with the Plan Bay Area goals and strategies to reduce regional GHG emissions. When considered along with the advanced construction and subsequent operation of 333 Golden Gate Avenue, as previously discussed, no additional GHG emissions would be generated. Therefore, the LRCP would not conflict with Plan Bay Area, and the impact would be less than significant.

The UCSF Greenhouse Gas Reduction Strategy includes programs, policies, and actions that are expected to reduce GHG emissions between now and the planning horizon for the LRDP (2035). Relevant strategies include improving energy efficiency of existing buildings, complying with green building standards, and reducing vehicle trips. The LRCP includes a combination of modernizing existing buildings and constructing new buildings. The modernization would improve the energy efficiency of existing buildings, and the new construction would be designed to meet energy efficiency requirements, including Title 24 standards. As discussed previously, the LRCP would reduce per-capita VMT by providing additional housing on campus. This is would be compatible with the UCSF Greenhouse Gas Reduction Strategy and statewide efforts to reduce GHG emissions. Therefore, the LRCP would be consistent with the UCSF Greenhouse Gas Reduction Strategy, and the impact would be less than significant.

4.5.3 Cumulative Impacts

The CEQA Guidelines emphasize that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's existing cumulative impacts analysis. Consequently, the project-level analysis, provided previously, also represents the cumulative GHG analysis. The GHG analysis determined that the proposed LRCP development projects would not result in significant impacts related to GHG emissions and would be consistent with applicable GHG plans, policies, and regulations. Therefore, impacts related to GHG emissions would not be cumulatively considerable.

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4.6 LAND USE AND PLANNING

This section describes the general land uses and zoning of the UC Hastings campus and surrounding vicinity, and the applicable plans and policies that relate to the LRCP. This section identifies potential land use impacts and any mitigation measures necessary to reduce those impacts. As noted in Chapter 3, Project Description, UC Hastings is a state entity and is not subject to San Francisco jurisdiction or planning and land use controls. The compatibility of the LRCP with State of California plans and policies related to land use and planning are evaluated in this section; City and County of San Francisco General Plan designations and zoning are evaluated for informational purposes and context.

4.6.1 Setting

Land Use

The UC Hastings campus is in the downtown Civic Center neighborhood of San Francisco, and the College owns and occupies five buildings and one undeveloped lot on the two blocks bounded by Golden Gate Avenue to the north, Larkin Street to the west, McAllister Street to the south, and Leavenworth Street to the east (see Chapter 3, Figure 3-1, Project Location). A summary of existing UC Hastings buildings and uses is included in Table 4.6-1. The campus and surrounding vicinity are completely developed with buildings and other urban uses, and is within a mixture of Residential-Commercial (RC-4), Commercial (C-3-G), and Public (P) zoning use districts.[1]

Table 4.6-1: Existing UC Hastings Buildings

Building	Land Area (sf)	Building (sf)	No. of Floors	Primary Program
100 McAllister Street	19,000	249,000	27 (+ basement)	Residential
198 McAllister Street	23,000	76,000	4 (+ 3 mezzanine)	Academic
50 Hyde Street	9,000	61,000	4	Academic/Multipurpose
200 McAllister Street	42,000	177,000	6	Academic/Office
376 Larkin Street	26,000	157,000	7 (+basement)	Parking
333 Golden Gate Avenue	12,000	0	n/a	n/a
Total	**131,000**	**720,000**	-	-
Source: UC Hastings. September 2015. *Five Year Infrastructure Plan 2016–2021.*				

The UC Hastings campus is one block north and east of the San Francisco Civic Center, which contains key institutional and governmental functions. UC Hastings is the oldest public law school in California, and has been a key part of the character of the Civic Center neighborhood,

1 City and County of San Francisco. 2015. Planning Department. Zoning Map, July 2015. Online. http://www.sf-planning.org/?page=1569. Site visited November 23, 2015.

which comprises the Supreme, Appellate, and Superior courts of California, and other city, state, and federal buildings. The Civic Center includes the 20-story Phillip Burton Federal Building and the 14-story State Office Building west of UC Hastings on Golden Gate Avenue.

The Civic Center area also includes performing arts uses and other cultural institutions, including the Bill Graham Civic Auditorium, the Main Library, Asian Art Museum, Louise M. Davies Symphony Hall, San Francisco Opera House, and the Veterans Building. Civic Center Plaza offers a large public open space in the immediate vicinity, southwest of UC Hastings. Bounded by McAllister Street, Polk Street, Grove Street, and Larkin Street, Civic Center Plaza includes lawns, walkways, and two playgrounds along Larkin Street.

Numerous residential, mixed-use, commercial, educational, and office uses, often with ground-floor retail uses, are located north and east of the campus. Predominantly five- and six-story residential, senior housing, and hotel buildings are located north of UC Hastings, in the Tenderloin neighborhood.

Plans and Policies

In accordance with CEQA Guidelines Section 15125(d), this section outlines the plans and policies applicable to the LRCP. UC Hastings is subject to state-level and regional plans and policies, which are described in the following paragraphs. As an entity of the State of California, UC Hastings is not subject to City and County of San Francisco jurisdiction or planning controls. However, this section discusses local plans and codes for context, information, and reference purposes.

State and Regional Plans

While no state-level plans have immediate influence over the LRCP area, the ABAG Land Use Policy Framework[2] and Building Momentum: Projections and Priorities 2009[3] provide insight into the region's economy and present impacts related to carbon dioxide emissions from cars and light trucks, as well as other measures. Building Momentum: Projections and Priorities 2009 forecasts population, employment, income, and households for the San Francisco Bay Area (including the region, nine counties, and over 100 cities) for the years 2000, 2005, 2010, 2015, 2020, 2025, 2030, and 2035.

San Francisco Plans/Policies

As previously stated, UC Hastings is a state entity, and is not subject to City and County of San Francisco jurisdiction and controls. However, local plans and policies are discussed in the

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[2] ABAG. 1999. A Land Use Policy Framework for the San Francisco Bay Area. Online: http://www.abag.ca.gov/planning/rgp/menu/landuse.html. Site visited on January 14, 2016.

[3] ABAG. 2009. Building Momentum: Projections and Priorities 2009. Online: http://www.abag.ca.gov/planning/currentfcst/. Site visited on January 14, 2016.

following paragraphs for context and informational purposes. This section describes local San Francisco plans and zoning districts within the LRCP area as well as the surrounding vicinity.

San Francisco General Plan

The San Francisco General Plan (General Plan) is both a strategic and long-term document, and is composed of 10 elements that embody the City's collective vision for the future of San Francisco.[4] The General Plan provides general policies and objectives to guide land use decisions subject to San Francisco jurisdiction. Elements discussed in the General Plan include air quality, arts, commerce and industry, community facilities, community safety, environmental protection, housing, recreation and open space, transportation, and urban design. The General Plan does not include a separate land use element; rather, land use policies are dispersed throughout the other elements of the General Plan.

The General Plan also includes 15 area plans that identify specific localized goals and objectives for a neighborhood or district, and guide the nature of future development within specific geographic areas of the city. Area plans that would be applicable to LRCP development are discussed in greater detail in the following paragraphs.

Downtown Area Plan

The Downtown Area Plan (Downtown Plan) contains objectives and policies to guide decisions affecting the entire San Francisco downtown area, dictating that it should encompass a compact mixture of activities, historical values, and distinctive architecture and urban forms. The Downtown Plan discusses several broad topics relating to development in the area, including space for commerce, which includes office, retail, hotel, and commercial spaces; space for housing, including expansion of the available supply and the protection of existing housing; open space, ensuring that sufficient resources are provided; preserving the past, including notable landmarks and structures; urban form, including height and bulk, sunlight and wind, building appearance, and streetscape; moving about, including public transit and streetscape improvements; seismic safety; and the pedestrian network.

Civic Center Area Plan

The Civic Center Area Plan (Civic Center Plan) is a guide to development within the Civic Center area, and primarily focuses on objectives and policies that should apply to future development.[5] The Civic Center Plan includes five broad activity categories including administrative, entertainment-culture, open space, parking, and housing, which provide general guidance for future development of the area.

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[4] City and County of San Francisco. 2015. Planning Department. General Plan. Online: http://www.sf-planning.org/ftp/general_plan/. Site visited on November 23, 2015.

[5] Ibid

The administrative category encompasses political and legal activities of the executive, legislative, and judicial departments of the government. The entertainment-culture category encompasses amusement, sports, convention, education and library, recreational, artistic, musical, and theatrical activities providing increased public use. The open space category relates to open and unobstructed areas that provide passive or active activity areas for public use. The parking category encompasses any major parking area within a structure or building that provides off-street parking for uses other than those incidental to the primary use of the structure. Finally, the housing category encompasses the existing low- and moderate-income housing stock and new infill housing within the Civic Center neighborhood. Although UC Hastings is not within the core area of the Civic Center Plan boundaries, as shown on Map 1 of the Civic Center Plan,[6] the blocks on which the campus is located are part of the administrative and entertainment-culture category areas.

Tenderloin 2000 Survey and Plan

The Tenderloin 2000 Survey Plan (Tenderloin Plan) is a 10-year plan adopted by the Planning Commission in 1995 that updates the Market Planning Coalition's original neighborhoods needs assessment called The Tenderloin Tomorrow. The Tenderloin Plan presents the community's issues, desires, and recommendations for the neighborhood. The comprehensive long-range approach includes 126 strategies covering issues such as public safety, affordable housing, economic development, physical environment, public services, and community facilities. Although the Tenderloin Plan does not specifically discuss educational uses as part of plan goals, UC Hastings is an established fixture of the Civic Center/Tenderloin area.

Zoning

As discussed in Chapter 3, Project Description, existing San Francisco Planning Code Use Districts in the UC Hastings area are High Density Residential-Commercial (RC-4), Downtown General Commercial (C-3-G), and Public (P) districts. Table 4.6-2, UC Hastings Property Zoning, contains a summary of zoning for each UC Hastings property; these districts are illustrated in Figure 4.6-1, Planning Code Use Districts.

The UC Hastings campus includes sites designated in the San Francisco Planning Code as P – Public Uses, which applies to land owned by a government agency in some form of public use, consistent with the current educational uses at 50 Hyde Street and 198 and 200 McAllister Street. The 100 McAllister Street building is in a C-3-G, Downtown Commercial – General district, which is one of five separate C-3 – Downtown Commercial districts that permit a variety of uses, including institutional, residential, retail, office, hotel, and entertainment uses.

[6] City and County of San Francisco. 2015. Planning Department. General Plan. Civic Center Area Plan, Map 1. Online: http://www.sf-planning.org/ftp/general_plan/images/civic_center/Map1.gif. Site visited on December 15, 2015.

Table 4.6-2: UC Hastings Property Zoning

Building	Zoning Designation
100 McAllister Street	C-3-G
198 McAllister Street	P
50 Hyde Street	P
200 McAllister Street	P
376 Larkin Street	RC-4
333 Golden Gate Avenue	RC-4
Source: City and County of San Francisco. 2015. Planning Department. Zoning Map, July 2015.	

The 333 Golden Gate Avenue lot and UC Hastings Parking Garage are in a RC-4, Residential-Commercial High Density district, which encourages high-density residential uses with commercial uses on the ground floor. The RC-4 district also allows for conditional uses, such as institutional and parking uses, approvable based on standards and criteria in the Planning Code.

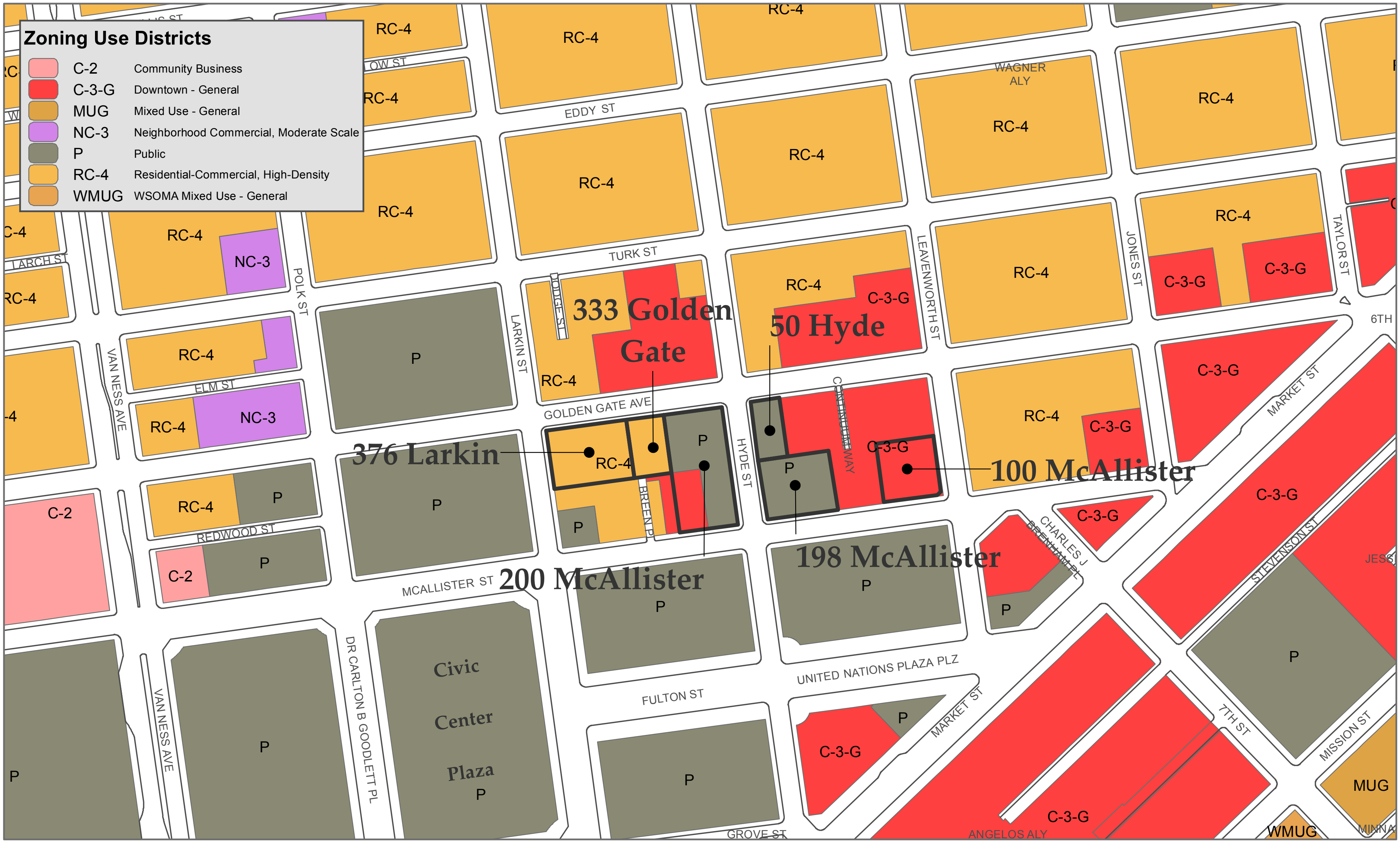
Figure 4.6-2, Planning Code Height and Bulk Districts, illustrates Planning Code height and bulk districts in the area. The UC Hastings campus is within an 80-T height and bulk district. This district permits new structures up to 80 feet in height, with an additional 16-foot allowance for mechanical projections, as allowed per Planning Code Section 260(B). The 308-foot-high 100 McAllister Street Tower was built before the adoption of the current Planning Code height districts.

4.6.2 Impacts and Mitigation

Significance Criteria

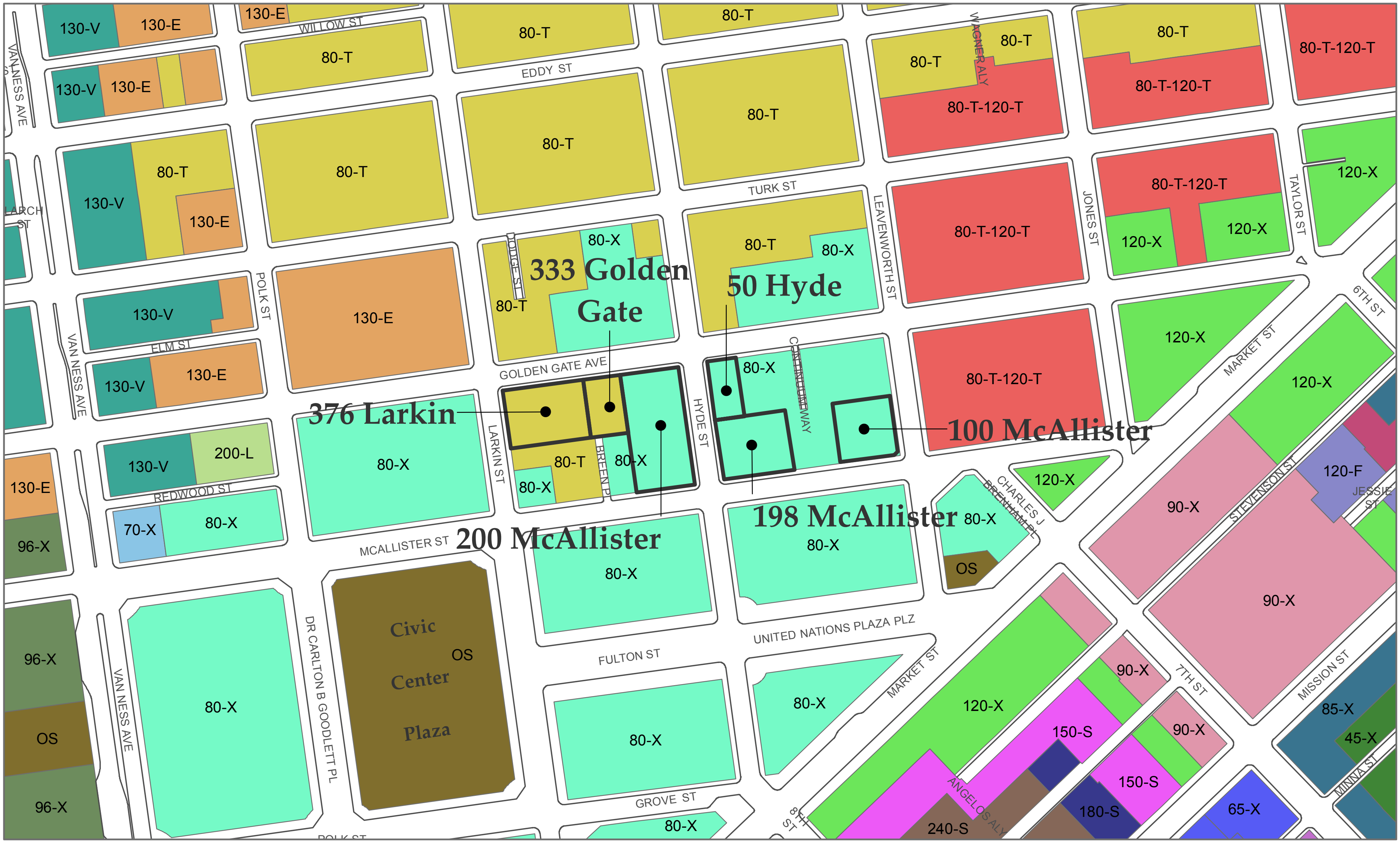
The thresholds for determining the significance of the impacts in this analysis are consistent with the environmental checklist in Appendix G of the CEQA Guidelines. For the purposes of this analysis, the following applicable thresholds were used to determine whether implementation of the UC Hastings LRCP would result in a significant impact related to planning or land use. Implementation of the LRCP would have significant impacts if it would:

- conflict with any applicable land use plan, regulation, or policy adopted for the purpose of avoiding or mitigating an environmental effect; or
- have a substantial impact upon the existing character of the vicinity.



Source: TRC Solutions, City and County of San Francisco

FIGURE 4.6-1: PLANNING CODE USE DISTRICTS



Source: TRC Solutions, City and County of San Francisco

FIGURE 4.6-2: PLANNING CODE HEIGHT AND BULK DISTRICTS

Methodology

Although UC Hastings is not subject to City and County of San Francisco plans and policies, the LRCP is evaluated against State of California plans and policies related to land use and planning; City and County of San Francisco zoning and General Plan designations are evaluated for context and for informational purposes.

Proposed LRCP developments were also evaluated against the existing land uses and land use character of UC Hastings and the surrounding area to determine any potential incompatible uses.

Impacts

Impact LU-1 The project would not conflict with any applicable land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect. ***Less-than-Significant Impact***

Land use impacts would be considered significant if the LRCP development projects would conflict with any applicable plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. As a state entity, UC Hastings is not subject to San Francisco jurisdiction. While no state-level plans have immediate influence over the LRCP area, other regional plans, such as ABAG's Land Use Policy Framework and Projections 2009 and Building Momentum: Projections and Priorities 2009, provide future land use projections for the purpose of avoiding or mitigating environmental effects. ABAG's Land Use Policy Framework establishes policy framework to guide future land use decision making in the Bay Area. Among other policies and actions, it advocates for a city-centered concept of urban development, directing and permitting development within existing urban boundaries, and along established transit corridors and infrastructure. LRCP development projects would meet the criteria contained in the plan, and would not conflict with regional land use goals. Furthermore, the LRCP is a programmatic document that is intended to enhance the objectives and infrastructure of the existing campus to achieve campus-wide academic and campus housing goals. The LRCP would not expand campus boundaries. The LRCP development projects would not conflict with the goals and objectives set forth in any state plans or policies related to land use and planning.

Existing development and uses at UC Hastings are consistent with relevant goals and elements of the San Francisco General Plan. The LRCP would not expand the UC Hastings campus beyond its current properties; rather, the LRCP would reorganize uses on existing campus sites to accommodate academic and campus housing uses proposed in the LRCP. However, the uses under the LRCP would not differ from existing campus functions. UC Hastings uses and buildings would remain consistent with land use policies and objectives in the General Plan, Downtown Plan, and Civic Center Plan.

UC Hastings is an established institution within the downtown area of San Francisco, and an integral part of the existing character of the Civic Center and Tenderloin neighborhoods. The LRCP and proposed developments would be consistent with key Downtown Plan and Civic Center Plan goals to maintain educational uses, provide infill housing, and enhance mixed uses, including ground-floor commercial and retail spaces. Any reorganization of uses or development would be consistent with the character of the Downtown and Civic Center Plans.

Although the Tenderloin Plan does not specifically discuss educational uses as part of plan goals, as an established fixture of the Tenderloin neighborhood, UC Hastings is a key part of the community. With the inclusion of things like ground-floor retail/commercial space, the LRCP would continue to support and enhance the goals of developing greater community within the Tenderloin neighborhood. Therefore, the LRCP would not conflict with any established plans in the area.

Potential development under the LRCP would include development of the undeveloped lot at 333 Golden Gate Avenue with an academic building that would be a maximum of 90 feet tall, and redevelopment of 198 McAllister Street and potential redevelopment of 50 Hyde Street with 140-foot-tall campus housing buildings. UC Hastings would not be subject to Planning Code height limits, and LRCP development would be taller than the 80-foot Planning Code height limit. While not consistent with Planning Code height limits, the development of buildings at UC Hastings that would be taller than the Planning Code height limits would not, in and of itself, be an adverse environmental impact. The LRCP projects would respond to City of San Francisco planning goals for increased density near transit and for infill building. However, LRCP development at the proposed 90-foot to 140-foot heights could have effects on aesthetic, wind, and shadow conditions. Section 4.1, Aesthetics, Section 4.9, Shadow, and 4.10, Wind, of this EIR discuss those environmental effects.

Therefore, the LRCP would have less-than-significant impacts regarding land use plans, policies, and regulations adopted for the purposes of mitigating an environmental effect.

Impact LU-2 The project would not have a substantial impact upon the existing character of the vicinity. *Less-than-Significant Impact*

As discussed in Section 4.6.1, Setting, the existing character of the UC Hastings campus and the surrounding vicinity is a mixture of educational, civic, residential, commercial-residential, and public uses in and near the Civic Center neighborhood.

The LRCP is a programmatic document that is intended to enhance the objectives and infrastructure of the existing campus to achieve campus-wide academic and campus housing goals. The LRCP would not expand campus boundaries. As described in Table 4.6-1 and Section 4.6.1, UC Hastings is and has historically been an integral part of the Civic Center neighborhood, and development of new academic and campus housing buildings under the LRCP would maintain the existing character of the UC Hastings campus.

The LRCP would include new campus housing that is consistent with existing UC Hastings housing uses at 100 McAllister Street and with the range of residential uses found in the Tenderloin and Civic Center areas.

The LRCP would include the following five major infrastructure projects:

1. Construct a new, approximately 57,000-gsf academic building on the undeveloped lot at 333 Golden Gate Avenue
2. Demolish Snodgrass Hall at 198 McAllister Street and construct a new campus housing building in its place
3. Modernize or replace 50 Hyde Street; planning options include the possibility of incorporating the academic functionality of 50 Hyde Street into the lower levels of a campus housing complex on the combined 198 McAllister Street and 50 Hyde Street sites.
4. Renovate and reconfigure the Tower at 100 McAllister Street
5. Renovate and reuse the Great Hall at 100 McAllister Street

333 Golden Gate Avenue Construction

LRCP development at 333 Golden Gate Avenue would change the character of the immediate vicinity of the campus by replacing a currently paved open lot used by UC Hastings for demonstration gardening and outdoor recreation space with a building that is a maximum of approximately 90 feet tall and 57,000 gsf. Developing the property with academic uses would not constitute a change in the range of uses in the area. Also, the building may include ground-floor retail space, which would be consistent with other street-level uses in the vicinity, and would enhance greenspace through landscaped patios, roof decks, and vertical garden walls, in keeping with the LRCP commitment to generating cool-island effects throughout the campus as part of development projects.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Redeveloping the 198 McAllister Street building would change the use of the campus property to include additional campus housing (LRCP Variant A). The building would be approximately 13 stories and 140 feet in height, and would provide approximately 400 to 600 housing units within approximately 227,000 gsf. Residential uses are typical in the area, and the LRCP would incrementally increase the overall housing supply in San Francisco. Also, the building may include ground-floor retail space, which is consistent with other street-level uses in the vicinity. Modernization of the 50 Hyde Street building with Variant A would maintain existing uses, and therefore, would have no effect on the existing character of the area.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

As with Variant A, Variant B would redevelop the 198 McAllister site for campus housing, but would also include redevelopment of the 50 Hyde Street site for campus housing, allowing for an additional approximately 125 to 170 housing units. As with Variant A, residential uses are typical in the area, and the LRCP would incrementally increase the overall housing supply in San Francisco. Also, the building may include ground-floor retail space, which is consistent with other street-level uses in the vicinity.

The renovated 100 McAllister Street building would remain consistent with the existing character and uses established on the property, and the addition of up to approximately 100 new housing units would be consistent with the existing uses of the building and the uses in the vicinity.

While not consistent with Planning Code height limits, the development of buildings at UC Hastings that would be taller than the Planning Code height limits would not, in itself, be an adverse environmental effect. LRCP development at the proposed 90-foot to 140-foot heights could have effects on aesthetic, wind, and shadow conditions; these effects are discussed in Sections 4.1, Aesthetics, 4.9, Shadow, and 4.10, Wind, of this EIR.

Overall, while development under the LRCP would reorganize uses within the UC Hastings campus, it would not introduce new or unusual uses to the area. Inclusion of ground-floor retail and support services would enhance street-level activity within the UC Hastings campus and the surrounding community. Therefore, the LRCP would not have a substantial effect on the existing character of the area, and impacts would be less than significant.

4.6.3 Cumulative Impacts

Cumulative land use impacts are evaluated in the context of existing and reasonably foreseeable future development in the vicinity of UC Hastings, as well as applicable land use policies that guide future development in the area. Reasonably foreseeable future development could result in a noticeable change in the surrounding area in terms of increasing the number of people in the vicinity of the campus. Approximately 12 residential and mixed-use projects are under review, approved, or under construction within a three-block radius of UC Hastings. However, these developments would not alter the overall land use pattern of the Civic Center or Tenderloin areas beyond what is currently permitted under applicable local plans and codes.

Similarly, the LRCP would be consistent with the existing uses at the UC Hastings campus and in the surrounding area. While the use of specific sites would be reorganized under the LRCP, the overall mixture of commercial, commercial-residential, and public uses would not be changed, and thus, would not contribute to significant land use impacts. Development under the LRCP would not change the character of the Civic Center and Tenderloin areas, and would not expand the campus beyond its current boundaries.

The LRCP would not conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding an adverse environmental impact.

For these reasons, the LRCP, in combination with past, present, and reasonably foreseeable future projects, would result in less-than-significant cumulative land use impacts.

4.7 NOISE

This section provides an overview of existing noise and vibration levels in the vicinity of the UC Hastings campus and evaluates the potential for the UC Hastings LRCP development projects to result in impacts related to noise and vibration. This section also discusses short-term construction and long-term operational noise and vibration impacts. The following background information provides noise and vibration characteristics and effects.

4.7.1 Setting

Noise Characteristics and Effects

Characteristics of Sound

Sound is technically described in terms of the loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The A-weighted scale, abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Figure 4.7-1, A-Weighted Decibel Scale, provides examples of A-weighted noise levels from common sounds.

Noise Definitions

This noise analysis discusses sound levels in terms Equivalent Noise Level (L_{eq}), Day/Night Noise Level (L_{dn}), and Community Noise Equivalent Level (CNEL).

Equivalent Noise Level.

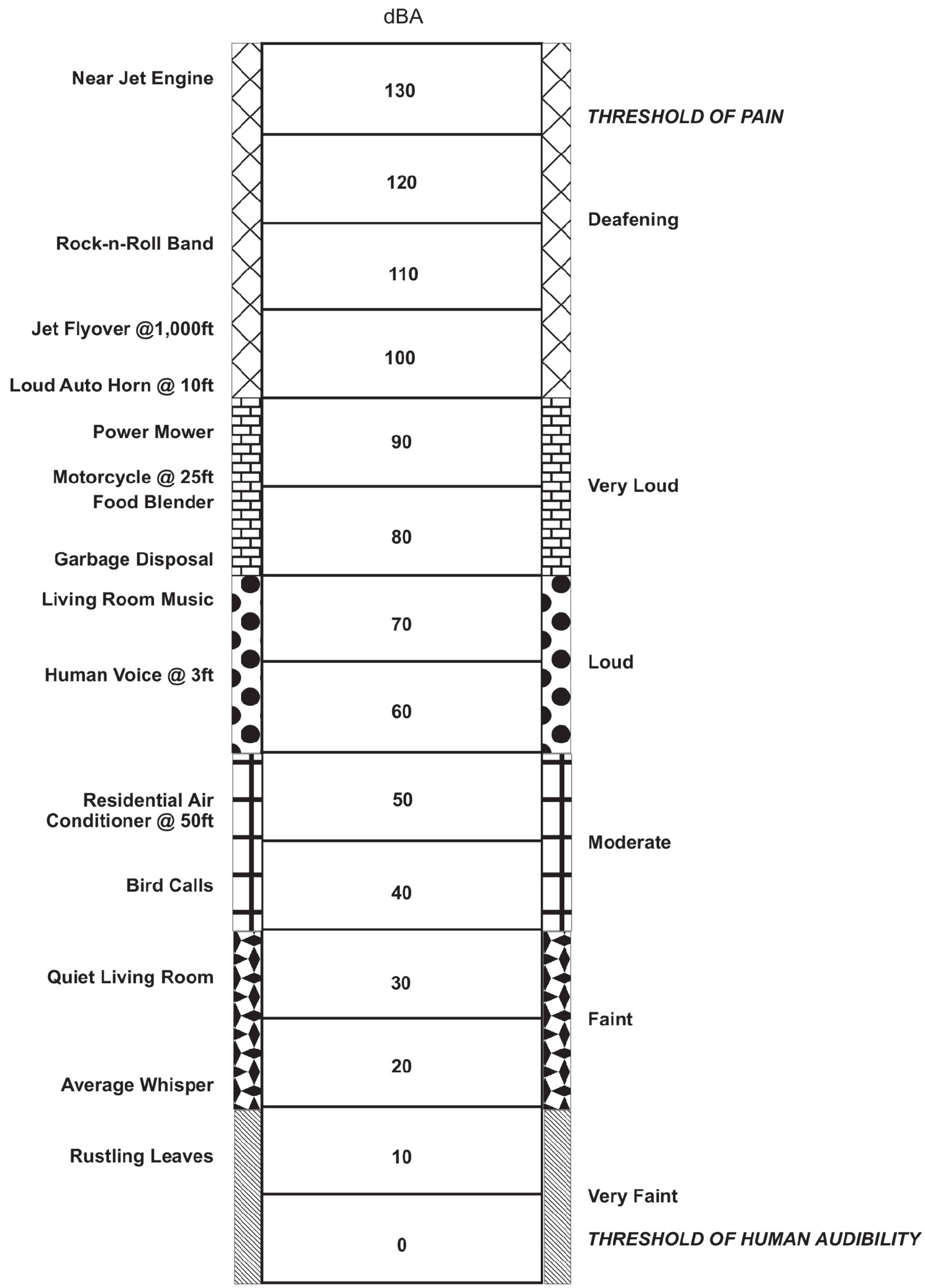
L_{eq} is the average noise level on an energy basis (i.e., acoustic energy of the sound) for any specific time period. The L_{eq} for 1 hour is the energy average noise level during the hour. L_{eq} can be thought of as the level of a continuous noise, which has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in terms of dBA.

Day/Night Noise Level

L_{dn} is the 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 decibels to sound levels occurring in the night between 10:00 p.m. and 7:00 a.m.

Community Noise Equivalent Level

CNEL is an average sound level during a 24-hour period, and is a noise measurement scale that accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m.



SOURCE: Cowan, James P., *Handbook of Environmental Acoustics.*

Source: TAHA, 2015

FIGURE 4.7-1: A-WEIGHTED DECIBEL SCALE

From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to the lower background level. Hence, the CNEL is obtained by adding an additional 5 dBA to sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night before 7:00 a.m. and after 10:00 p.m. Because CNEL accounts for human sensitivity to sound, the CNEL 24-hour noise level is always a higher number than the actual 24-hour average.

Effects of Noise

Noise generally is defined as unwanted sound. The degree to which noise can impact the human environment ranges from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Studies have shown that the smallest perceptible change in sound level for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and would likely evoke a community reaction. A 10-dBA increase is subjectively heard as a doubling in loudness, and would cause a community response. Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or point source, will decrease by approximately 6 dBA over hard surfaces (e.g., pavement) and 7.5 dBA over soft surfaces (e.g., grass) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of the distance. Generally, noise is most audible when traveling by direct line-of-sight. Barriers—such as walls, berms, or buildings—that break the line-of-sight between the source and the receiver greatly reduce noise levels from the source because sound can only reach the receiver by bending over the top of the barrier (diffraction).

Vibration Characteristics and Effects

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. In contrast to noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction sources, such as blasting, pile driving, and heavy earth-moving equipment.

Vibration Definitions

Several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (VdB) is commonly used to measure RMS. The decibel notation acts to compress the range of numbers required to describe vibration.

Effects of Vibration

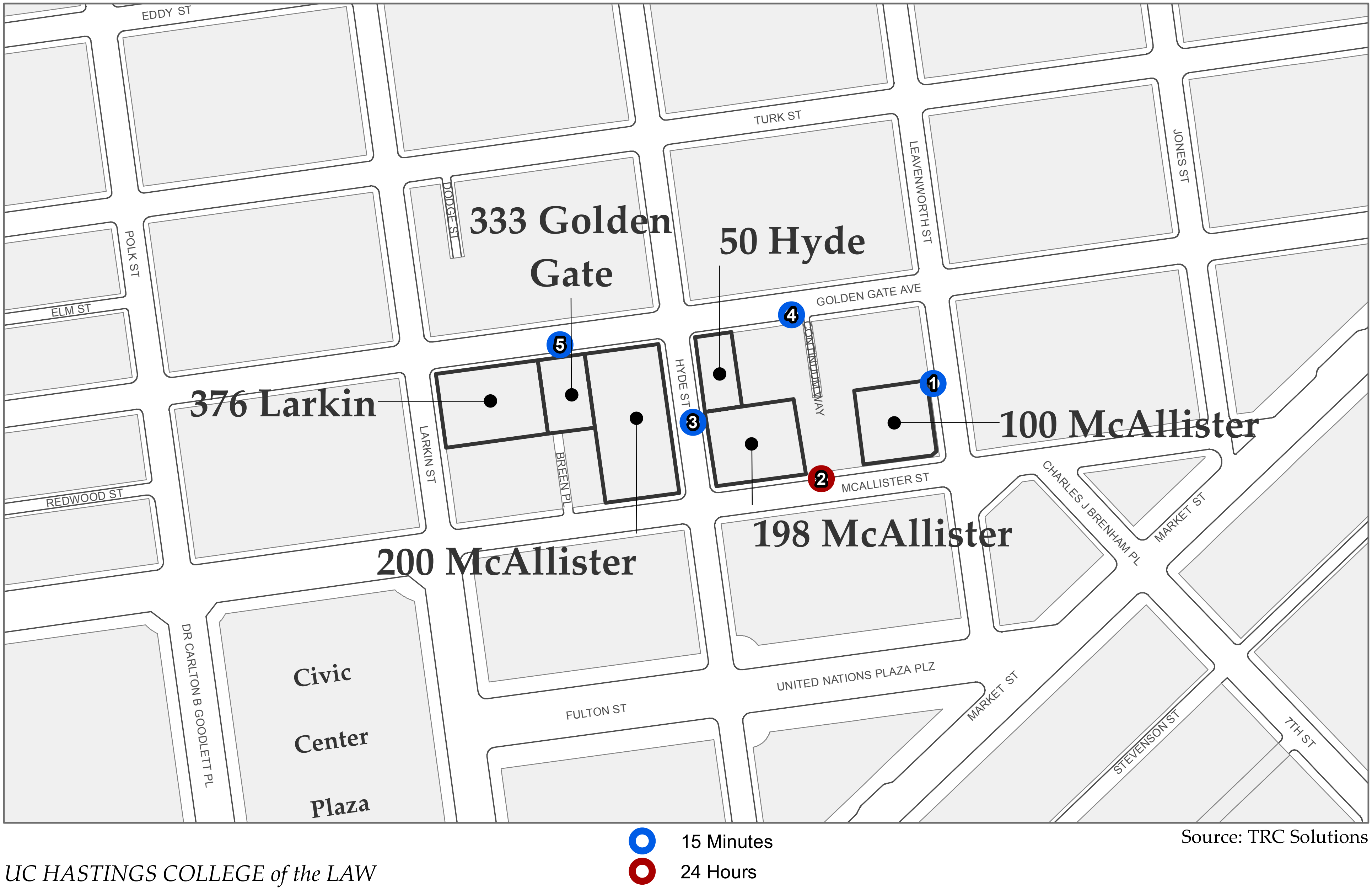
High levels of vibration may cause physical personal injury or damage to buildings. However, vibration levels rarely affect human health. Instead, most people consider vibration to be an annoyance that may affect concentration or disturb sleep. In addition, high levels of vibration may damage fragile buildings or interfere with equipment that is highly sensitive to vibration (e.g., electron microscopes).

Perceptible Vibration Changes

In contrast to noise, vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually 50 Vdb RMS or lower, well below the threshold of perception for humans, which is around 65 Vdb RMS. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible vibration are construction equipment, steel-wheeled trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible.

Existing Noise Conditions

The UC Hastings campus is in San Francisco’s Civic Center and Tenderloin neighborhoods where the existing noise environment is dominated by traffic noise sources, as is typical of urban environments. The campus has frontages on McAllister Street, Larkin Street, Golden Gate Avenue, Hyde Street, and Leavenworth Street. Major public transportation routes, including MUNI and BART lines, are on Market, McAllister, Hyde, Larkin, and Turk Streets, as well as Golden Gate Avenue. Four short-term (15-minute) measurements and one long-term (24-hours) measurement were completed on November 4, 2015, at locations shown in Figure 4.7-2, Noise Monitoring Locations. Table 4.7-1, Existing Noise Levels, presents the daytime monitored noise levels.



Source: TRC Solutions

FIGURE 4.7-2: NOISE MONITORING LOCATIONS

Table 4.7-1: Existing Noise Levels

Location		Start Time	Duration	Noise Level
1	Leavenworth Street	12:58 p.m.	15 minutes	63.7 L_{eq}
2	McAllister Street	12:05 p.m.	24 hours	69.2 L_{dn}
3	Hyde Street	11:39 a.m.	15 minutes	70.5 L_{eq}
4	Golden Gate Avenue	12:22 p.m.	15 minutes	68.5 L_{eq}
5	Golden Gate Avenue	12:40 p.m.	15 minutes	65.8 L_{eq}
Source: TRC Solutions 2015.				

Existing Land Uses and Sensitive Receptors

Land uses immediately surrounding the UC Hasting campus include areas northeast and northwest that are residential, commercial, and office uses (often with ground-floor retail). Areas to the south of the campus include numerous civic uses, primarily associated with the Civic Center, including cultural, institutional, and educational uses owned by various local, state, and federal agencies.

The southwestern portion of the McAllister-Larkin-Golden Gate-Hyde block—which is adjacent to the UC Hastings Parking Garage at 376 Larkin Street and Kane Hall at 200 McAllister Street—is occupied by older apartment structures, many with ground-floor retail uses. South of this block, the Asian Art Museum shares the McAllister frontage from the other side of McAllister Street, and further south is the San Francisco Public Library.

The northern portion of the McAllister-Hyde-Golden Gate-Leavenworth block fronting Golden Gate Avenue and Leavenworth Street, which is adjacent to Snodgrass Hall and 100 McAllister Street, is also occupied by older apartment structures with ground-floor retail uses. Mixed-use buildings are on the McAllister frontage between the UC Hastings buildings. East of this block are more mixed-use buildings, as well as St. Boniface Catholic Church and the DeMarillac Academy (grades 4 through 8).

Many of the properties in this area consist of older, four- to six-story apartment buildings with ground-floor commercial uses. The six-story, 80-foot-tall California State Building at 350 McAllister Street is west of the campus, and is connected to the 14-story, 200-foot-tall State Office Building at 455 Golden Gate Avenue. The 20-story, 300-foot-tall Phillip Burton Federal Building at 450 Golden Gate Avenue is northwest of the project site. The old Federal Office Building at 50 United Nations Plaza is immediately south of the UC Hastings buildings located at 100 and 198 McAllister Street.

Some land uses are considered more sensitive to noise and vibration than others. Noise- and vibration-sensitive land uses are locations where people reside or where the presence of unwanted sound/vibration could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, religious institutions, and some passive recreation areas would each be considered noise- and vibration-sensitive and may warrant unique measures for protection from intruding noise and vibration.

Sensitive receptors within 500 feet of a potential construction zone at the UC Hastings campus are as follows:

- On-site campus housing at 100 McAllister Street
- Civic Center Suites neighboring the campus on the eastern side, with receptors located within approximately 10 feet
- Madonna Senior Residence (Mercy Housing) located approximately 20 feet north of the campus
- Plaza Ramona Apartments neighboring the campus on the south side, with receptors located within approximately 20 feet
- Hampton Court Apartments located approximately 100 feet northwest
- St. Boniface Church and DeMarillac Academy located approximately 150 feet east
- The Asian Art Museum located approximately 200 feet south
- Classic Suites Apartments located approximately 200 feet east
- C5 Children's School daycare center located approximately 266 feet west
- Oasis Apartments located approximately 300 feet north
- Kelly Cullen Community Apartments located approximately 500 feet east

Regulations

Federal

U.S. Environmental Protection Agency

The EPA Office of Noise Abatement and Control was originally established to coordinate federal noise-control activities. The office issued the Federal Noise Control Act of 1972, which set programs and guidelines to identify and address the effects of noise on public health and welfare, and the environment. Although the primary responsibility of regulating noise was transferred to state and local governments in 1982, the EPA provided guidelines for noise levels that would be considered safe for community exposure without the risk of adverse health or welfare effects. The EPA found that to prevent hearing loss over the lifetime of a receptor, the yearly average L_{eq} should not exceed 70 dBA, and the L_{dn} should not exceed 55 dBA in outdoor activity areas or 45 dBA indoors to prevent interference and annoyance.[1]

[1] U.S. Environmental Protection Agency. 1974. *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*.

Federal Transit Administration

The Federal Transit Administration (FTA) has published vibration guidance relevant to the project analysis. To address the human response to groundborne vibration, FTA has established guidelines for maximum acceptable vibration criteria for different types of land uses for ongoing groundborne vibration events.[2] These guidelines recommend that maximum vibration levels be established from 72 VdB to 80 VdB for residential uses and buildings where people normally sleep. The FTA has established guideline thresholds for construction vibration impacts for various structural categories, as shown in Table 4.7-2, Vibration Damage Criteria.

Table 4.7-2: Vibration Damage Criteria

Building Category	PPV (inches/second)
I. Reinforced – Concrete, Steel, or Timber (no plaster)	0.5
II. Engineered Concrete and Masonry (no plaster)	0.3
III. Non Engineered Timber and Masonry Buildings	0.2
IV. Buildings Extremely Susceptible to Vibration Damage	0.12
Source: Federal Transit Administration. 2006. *Transit Noise and Vibration Impact Assessment.*	

State

State Noise Insulation Standard

The State of California has established regulations that help prevent adverse impacts on occupants of buildings located near noise sources. Title 24, Part 2, of the California Code of Regulations, referred to as the State Noise Insulation Standard, requires buildings to meet performance standards through design and/or building materials that would offset any noise source in the vicinity of the receptor. State regulations include requirements for the construction of new hotels, motels, apartment houses, and dwellings, other than detached single-family dwellings, that are intended to limit the extent of noise transmitted into habitable spaces. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior noise sources, the noise insulation standards set an interior standard of 45 dBA CNEL in any habitable room, with all doors and windows closed. In addition, the standards require preparation of an acoustical analysis demonstrating the manner in which dwelling units have been designed to meet this interior standard, where such units are proposed in an area with exterior noise levels greater than 60 dBA CNEL.

[2] Federal Transit Administration. 2006. *Transit Noise and Vibration Impact Assessment*.

California Department of Transportation

The California Department of Transportation (Caltrans) has published vibration guidance relevant to the project analysis. The Traffic Noise Protocol includes a standard related to interior noise levels in classrooms.[3] The guidance states that interior noise levels should not exceed 52 dBA L_{eq}.

Local

As a state entity, UC Hastings is not subject to City and County of San Francisco jurisdiction. Local noise policies, regulations, and ordinances are provided herein for informational purposes.

San Francisco General Plan

San Francisco addresses noise policies in the General Plan's Environmental Protection Element.[4] This element includes a Transportation Noise section that provides general guidance for reducing transportation noise through land use and transportation planning. The General Plan Transportation Noise Section states that, "in a fully developed city, such as San Francisco, where land use and circulation patterns are by and large fixed, the ability to reduce the noise impact through a proper relationship of land use and transportation facility location is limited."[5]

The General Plan focuses on the effect of noise on the community due to ground transportation noise sources and establishes the Land Use Compatibility Chart for Community Noise for determining when noise reduction requirements should be analyzed, such as providing sound insulation for affected properties. The standards in the land use compatibility standards for community noise determine the maximum acceptable noise environment for each newly developed land use, and are shown in Figure 4.7-3, Land Use Compatibility Chart for Community Noise. Detailed noise analyses are needed if exterior noise levels at proposed residences and school locations exceed 70 dBA L_{dn}.

San Francisco Noise Ordinance

As a state entity, UC Hastings is not required to comply with the San Francisco Noise Ordinance (Noise Ordinance). However, the Noise Ordinance is used to inform the analysis in this EIR. The Noise Ordinance regulates both construction noise and stationary-source noise within the city, including noise from transportation, construction, mechanical equipment, entertainment, and human or animal behavior. In Article 29, Regulation of Noise, of the San Francisco Police Code, the Noise Ordinance addresses noise from construction equipment, nighttime construction work, and noise from stationary mechanical equipment and waste processing activities.[6]

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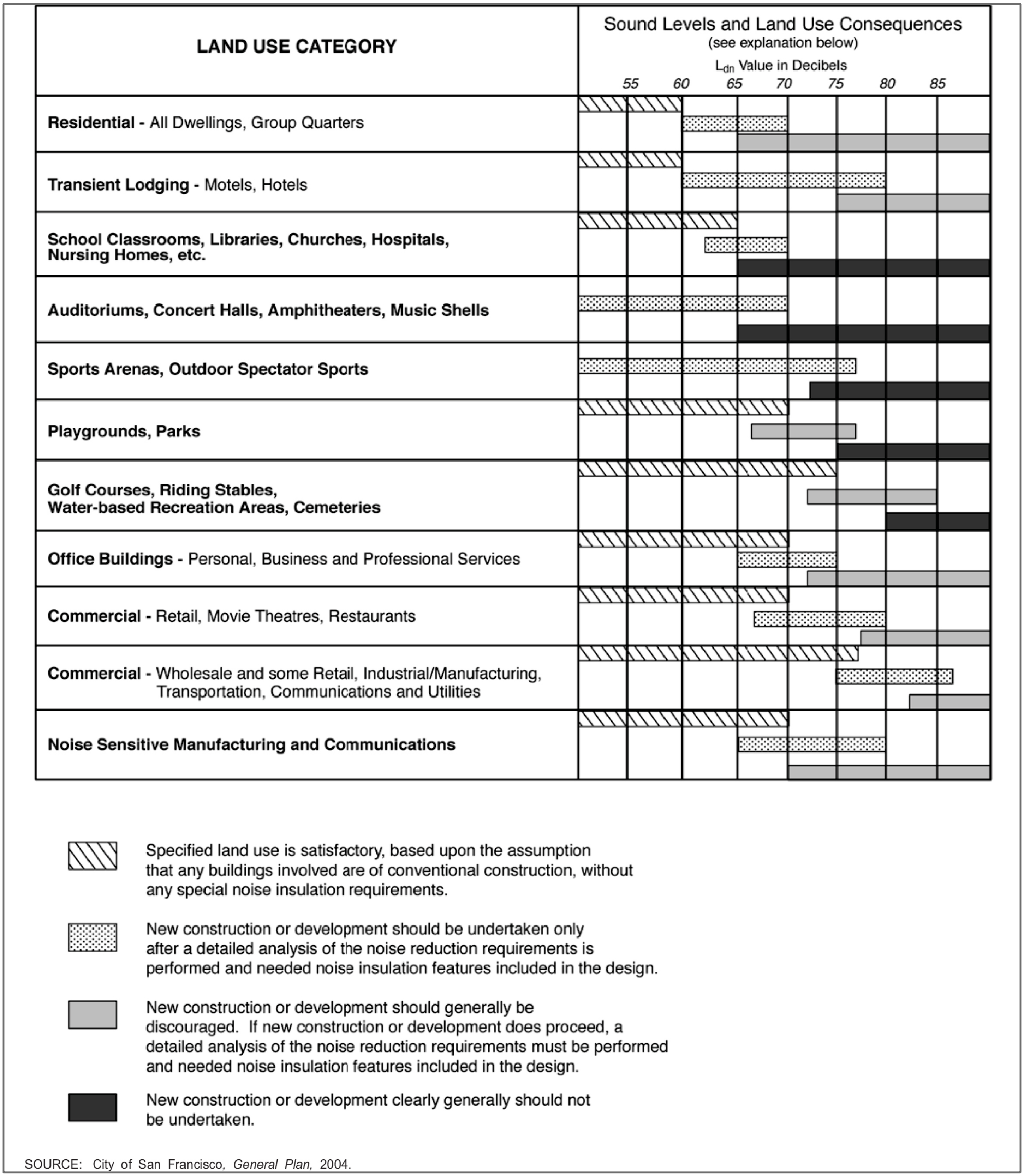
3 Caltrans. 2011. *Traffic Noise Protocol*.

4 City and County of San Francisco. 2004. *City of San Francisco General Plan*. Online: http://www.sf-planning.org/ftp/general_plan/. Site visited on December 7, 2015.

5 Ibid.

6 City and County of San Francisco. 2012. Article 29 of the San Francisco Police Code, Regulation of Noise.



Source: TAHA, 2015

FIGURE 4.7-3: LAND USE COMPATIBILITY CHART FOR COMMUNITY NOISE

Section 2907, Construction Equipment, and Section 2908, Construction Work at Night, establishes the following noise regulations for construction equipment:

- Section 2907 (a) limits noise levels from construction equipment as specified under the ordinance to 80 dBA L_{eq} at 100 feet (or other equivalent sound levels at other distances) from construction equipment between 7:00 a.m. and 8:00 p.m.

- According to Section 2908, construction work at night (from 8:00 p.m. to 7:00 a.m.) may not exceed the ambient level by 5 dBA at the nearest property line unless a special permit is granted before such work by the Director of Public Works or the Director of Building Inspection. If night work is in the general public interest, under Section 2908, the Director of Public Works or the Director of Building Inspection shall prescribe such conditions, working times, types of construction equipment to be used, and permissible noise emissions.

- The provisions of Section 2907(a) do not apply to impact tools and equipment if the impact tools and equipment have intake and exhaust mufflers, as recommended by the manufacturers, and are approved by the Director of Public Works or the Director of Building Inspection as accomplishing maximum noise attenuation. The noise exemption also does not apply to pavement breakers and jackhammers, which also must be equipped with acoustically attenuating shields or shrouds, as recommended by the manufacturers and approved by the Director of Public Works or the Director of Building Inspection as accomplishing maximum noise attenuation.

- Section 2909, Noise Limits. This section of the Noise Ordinance regulates noise from mechanical equipment and other similar sources.. Mechanical equipment operating on commercial or industrial property must not produce a noise level more than 8 dBA above the ambient noise level at the property plane. Equipment operating on residential property must not produce a noise level more than 5 dBA above the ambient noise level at the property boundary. Section 2909 also states in subsection (d) that no fixed (permanent) noise source (as defined by the Noise Ordinance) may cause the noise level inside any sleeping or living room in a dwelling unit on residential property to exceed 45 dBA between 10:00 p.m. and 7:00 a.m. or 55 dBA between 7:00 a.m. and 10:00 p.m. when windows are open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed.

4.7.2 Impacts and Mitigation

Significance Criteria

A significant impact relative to noise and vibration would occur if:

- the proposed project would expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

- the proposed project would result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- the proposed project would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project
- the proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; and/or
- the proposed project would be substantially affected by existing noise levels.

A significant noise or vibration impact would therefore result from any of the following occurrences:

- Construction noise would exceed the ambient noise level at 100 feet from the noise source by 5 dBA L_{eq} or more at a noise-sensitive use from 8:00 p.m. to 7:00 a.m.
- Construction noise would exceed the maximum noise level of 80 dBA at 100 feet from the noise source at a noise-sensitive use from 7:00 a.m. to 8:00 p.m.
- On-road vehicle activity would increase operational noise by 5 dBA, which is considered a noticeable increase that would likely evoke a community reaction.
- The operation of mechanical equipment would produce a noise level more than 8 dBA above the ambient noise level at the property line.
- Interior noise levels at new classrooms and residences would exceed 52 dBA L_{eq} and 45 dBA L_{dn}, respectively.
- Construction or operational vibration levels exceed 0.3 inches per second for engineered concrete and masonry buildings (no plaster) or 0.12 inches per second for historic buildings.
- The construction or operational vibration levels exceed 80 VdB at residential land uses from 8:00 p.m. to 7:00 a.m.

Methodology

Construction noise levels were based on EPA information. Noise levels associated with typical construction equipment were obtained from the Federal Highway Administration Roadway Construction Noise Model and EPA. This model predicts noise from construction operations based on a compilation of empirical data and the application of acoustical propagation formulas. Maximum equipment noise levels were adjusted based on anticipated percentage of use. Example equipment noise levels were estimated by making a distance adjustment to the construction source noise level. The methodology used for this analysis can be viewed in

Section 2.1.4 (Sound Propagation) of the Caltrans Technical Noise Supplement. Vibration levels generated by construction equipment were estimated using example vibration levels and propagation formulas provided by FTA.[7] The methodology used for the analysis can be viewed in Section 12.2 (Construction Vibration Assessment) of the FTA guidance.

Impacts

Impact NO-1 The project would expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. ***Significant and Unavoidable Impact***

Construction

The development of new buildings under the LRCP could involve a range of construction techniques and schedules that would be established during later design phases. Depending on specific site conditions or engineering needs, project construction activities could require nighttime construction or use of equipment that could create vibration impacts. Project construction is expected to use of a mix of construction equipment typical of large development projects, including bulldozers, jackhammers, graders, and auger drillers. While those activities may be limited in duration, the construction noise and vibration analysis herein assumes that such activities could occur. As presented in the following paragraphs, certain nighttime construction may be necessary. Thus, some noise and vibration effects may not be avoided with mitigation measures and are conservatively judged to be significant unavoidable environmental impacts.

Two types of short-term noise impacts would occur during the demolition and construction phases of potential development under the LRCP. The first would be the increase in traffic flow on local streets, associated with the transport of workers, equipment, and materials to and from the campus. The pieces of heavy equipment for demolition and construction would be moved to the site and remain for the duration of each construction phase. An increase in traffic flow on the surrounding roads due to construction traffic is expected. However, the noise levels associated with trucks arriving at and departing from the project site would be short term and intermittent. In addition, average daily construction trips would be a minimal percentage of the existing background traffic volumes on access routes, and therefore, would not result in a perceptible increase in average daily traffic noise levels.

The second type of short-term noise impact would be related to the noise generated by heavy equipment operating at an LRCP development site. Construction is performed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise

[7] Federal Transit Administration. 2006. *Transit Noise and Vibration Impact Assessment*.

sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 4.7-3, Maximum Noise Levels of Typical Construction Equipment, lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet and 100 feet between the equipment and a noise receptor.

Table 4.7-3: Maximum Noise Levels of Typical Construction Equipment

Noise Source	Noise Level (dBA, L_{eq})	
	50 Feet	100 Feet
Backhoe	77.6	71.5
Compressor	77.7	71.6
Concrete Mixer Truck	78.8	72.8
Concrete Pump Truck	81.4	75.4
Crane	80.6	74.5
Dozer	81.7	75.6
Dump Truck	76.5	70.4
Excavator	80.7	74.7
Flat Bed Truck	74.3	68.2
Grader	85.0	79.0
Jackhammer	88.9	82.9
Man Lift	74.7	68.7
Auger Drill	77.4	71.4
Paver	77.2	71.2
Roller	80.0	74.0
Pile Driver	94.3	88.3
Source: Federal Highway Administration. 2008. Roadway Construction Noise Model, Version 1.1.		

To more accurately characterize construction-period noise levels, the average noise level was calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction phase, and are typically attributable to multiple pieces of equipment operating simultaneously. The noise levels in Table 4.7-4, Outdoor Construction Noise Levels, take into account the likelihood that more than one piece of construction equipment would be in operation at the same time, and lists the typical overall noise levels that would be expected for construction. The highest noise levels are expected to occur during the grading/excavation and finishing phases of construction. A typical piece of noisy equipment is assumed to be active for 40 percent of the 8-hour workday (consistent with the EPA studies of construction noise), generating a noise level of 89 dBA L_{eq} at a reference distance of 50 feet.

Table 4.7-4: Outdoor Construction Noise Levels

Construction Phase	Noise Level At 50 Feet (dBA)
Ground Clearing	84
Grading/Excavation	89
Foundations	78
Structural	85
Finishing	89
Source: EPA. 1971. Noise from Construction Equipment and Operations, Building Equipment and Home Appliances. PB 206717.	

333 Golden Gate Avenue

Buildings that would be most susceptible to noise-related impacts are the mixed-use residences on the same block as 333 Golden Gate Avenue, located at distances of 10 feet to 120 feet to the south and southwest. Mixed-use residences to the north and northeast would also be susceptible to noise impacts.

UC Hastings is not subject to San Francisco jurisdiction. For purposes of CEQA analysis, it is noted that the San Francisco Noise Ordinance requires that (1) noise levels from individual pieces of construction equipment, other than impact tools, must not exceed 80 dBA at a distance of 100 feet from the source (the equipment generating the noise); (2) impact tools, such as jackhammers, must have both the intake and exhaust muffled; and (3) if the noise from construction were to exceed ambient noise levels at the property line of the site by 5 dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m.

Table 4.7-3 shows that noise levels would generally be less than 80 dBA L_{eq} at 100 feet. The exception would be use of a jack hammer, which would generate a noise level of approximately 89 dBA L_{eq} at 100 feet. However, the local regulations do not apply to impact tools that are equipped with appropriate noise-control features. Thus, assuming that the impact equipment would comply with what are considered standard construction practices pertaining to noise-control features, the 80-dBA threshold at 100 feet would not apply to the impact equipment in Table 4.7-3, and impacts would be less than significant.

In acknowledgement that multiple pieces of equipment would operate at one time, a conservative analysis using combined noise levels is shown in Table 4.7-4. Construction noise levels associated with multiple pieces of equipment would generate 89 dBA at 50 feet or 83 dBA at 100 feet. Construction noise would have the potential to exceed the established threshold. MM-NO-1, Noise Reduction, includes measures to reduce noise levels. For example, a 6-foot construction barrier would reduce noise levels by a minimum of 5 dBA. Best available noise-control techniques would reduce standard equipment noise levels by at least an additional 3 dBA. Based on a conservative noise reduction of 3 dBA from implementation of MM-NO-1, equipment-related noise at 100 feet would be reduced to at least 80 dBA L_{eq}. This mitigation measure would ensure that noise associated with daytime construction activity would result in a less than significant impact.

It is anticipated that construction activity would generally only occur between 7:00 a.m. and 8:00 p.m. However, certain construction activities may be necessary between 8:00 p.m. and 7:00 a.m. Occupants at nearby residences and hotels would be sensitive to increased nighttime noise. MM-NO-1, Noise Reduction, would help control exposure to nighttime noise. Due to lower ambient noise levels at nighttime than daytime, it is anticipated that nighttime construction noise could be audible and could interfere with sleep activity at residences and hotels. If necessitated by construction schedules, these conditions could occur during excavation, foundation, or structural work phases between 8:00 p.m. and 7:00 a.m. Nighttime construction activity, if any, once a building shell was complete, would not be expected to generate noise levels that would interfere with sleep. Because some nighttime construction activities could exceed ambient noise levels at the property line of the site by 5 dBA, they are conservatively judged to be significant unavoidable environmental impacts.

Based on the previously described analysis, daytime construction activity associated with 333 Golden Gate Avenue would result in a less-than-significant construction-related noise impact with implementation of MM-NO-1. However, nighttime construction activity would result in a significant and unavoidable impact.

MM-NO-1: Noise Reduction

UC Hastings shall designate a dedicated public liaison who shall be responsible for addressing public concerns about construction activities, including excessive noise and vibration. The public liaison shall determine the cause of the concern and shall work with the construction contractor to implement feasible, reasonable measures to address the concern.

If nighttime construction activity between 8:00 p.m. and 7:00 a.m. is required, UC Hastings shall ensure that advance notice is provided to residences and hotels within 300 feet of the construction site.

For all development under the LRCP, the construction contractor shall be required to prepare and submit a comprehensive Noise Control Plan for review and approval by the project engineer. The Noise Control Plan shall be established prior to the start of project construction. The basic goals of the plan are to:

- ensure that the contractor is fully aware that noise control is an important issue and that noise abatement must be fully considered in constructing and costing the project;

- confirm that construction activities will not significantly increase overall community noise levels; and
- provide a means to evaluate the validity of community complaints regarding construction noise.

The plan shall establish means and methods for ensuring that construction activities do not exceed the noise impact thresholds at the property boundaries of adjacent noise-sensitive receptors. Specifically, noise levels should not exceed the ambient noise level (CNEL) at the property line of the closest noise-sensitive receptors by more than 5 dB for nighttime construction and mobile sources.

The Noise Control Plan may include, but is not limited to the following:

- Limiting noise emissions for construction equipment by ensuring that only well-maintained and properly muffled equipment is used at the construction site.
- Locating stationary noise sources (such as compressors) as far from adjacent or nearby sensitive receptors as possible.
- Undertaking the noisiest activities during times of least disturbance to surrounding residents and occupants, as feasible.
- Using impact tools (e.g., jackhammers) that are hydraulically or electrically powered, wherever possible, to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, exhaust mufflers on the compressed air exhaust apparatuses shall be used, along with external noise jackets on the tools, which could reduce noise levels by as much as 10 dBA.
- Managing construction traffic to minimize disruption to area residences and existing operations surrounding the construction zones.
- Locating staging areas as far away as possible from residences.
- Building temporary noise barriers around the construction site.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

In addition to the receptors discussed for 333 Golden Gate Avenue, buildings that would be most susceptible to noise-related impacts would be the mixed-use residences on the same block as 198 McAllister Street. Mixed-use residences to the north, northeast, and southeast would also be susceptible to noise impacts. Additionally, construction noise could impact St. Boniface

Catholic Church and DeMarillac Academy, located approximately 150 feet to the east of construction activity at 100 McAllister Street.

Construction activity associated with 198 McAllister Street would be similar to activity discussed previously for 333 Golden Gate Avenue. Construction activity associated with 50 Hyde Street would generally be within the structure, although equipment would be required to deliver materials and improve the facades. Construction noise associated with Variant A can be assessed in a similar manner as 333 Golden Gate Avenue. As previously discussed, construction noise would have the potential to exceed 80 dBA L_{eq} at 100 feet. Based on a conservative noise reduction of 3 dBA from implementation of MM-NO-1, equipment-related noise at 100 feet would be reduced to at least 80 dBA L_{eq}. Implementation of MM-NO-1 would reduce daytime impacts of construction noise to a less-than-significant level. However, as discussed above for 333 Golden Gate Avenue, nighttime construction activity that would exceed ambient noise levels at the property line of the site by 5 dBA would result in a significant and unavoidable impact, despite the implementation of MM-NO-1.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

In addition to the receptors discussed for 333 Golden Gate Avenue, buildings that would be most susceptible to noise-related impacts would be the mixed-use residences on the same block as the two buildings. These residences are located between 198 McAllister Street and 100 McAllister Street, and east of 50 Hyde Street. There are no other sensitive receptors on the same block. Mixed-use residences to the north, northeast, and southeast would also be susceptible to noise impacts. Additionally, construction noise could impact St. Boniface Catholic Church and DeMarillac Academy, located approximately 150 feet east of construction activity at 100 McAllister Street.

Construction activity associated with 198 McAllister Street and 50 Hyde Street would be similar to that discussed previously for 333 Golden Gate Avenue. Construction noise associated with Variant B can be assessed in a similar manner as 333 Golden Gate Avenue. As previously discussed, construction noise would have the potential to exceed 80 dBA L_{eq} at 100 feet. Based on a conservative noise reduction of 3 dBA from implementation of MM-NO-1, equipment-related noise at 100 feet would be reduced to at least 80 dBA L_{eq}. Implementation of MM-NO-1 would reduce the impact of daytime construction noise to a less-than-significant level. However, as discussed above for 333 Golden Gate Avenue, nighttime construction activity that would exceed ambient noise levels at the property line of the site by 5 dBA would result in a significant and unavoidable impact, despite the implementation of MM-NO-1.

100 McAllister Street

Construction activity associated with the 100 McAllister Street renovation would generally occur within the structure, although equipment would be required to deliver materials and improve the facade. Construction noise associated with the 100 McAllister Street renovation would likely be more limited than that with development of 333 Golden Gate Avenue, Variant

A, or Variant B. Conservatively, however, and as previously discussed, construction noise would have the potential to exceed 80 dBA L_{eq} at 100 feet. Based on a noise reduction of 3 dBA from implementation of MM-NO-1, equipment-related noise at 100 feet would be reduced to at least 80 dBA L_{eq}. Because construction activity would primarily be interior renovation, it would be expected that there would be minimal potential for nighttime construction noise impacts that would exceed ambient noise levels at the property line of the site by 5 dBA. Implementation of MM-NO-1 would reduce construction noise impacts to a less-than-significant level.

Operation

The potential for a substantial permanent increase in noise levels was assessed for mobile sources and stationary sources.

Mobile Sources. Development under the LRCP would generate new vehicle trips in the project vicinity from the increase in campus housing occupied by UC Hastings or UCSF students and employment. The campus would be accessible via Golden Gate Avenue, Larkin Street, McAllister Street, Hyde Street, and Leavenworth Street. The existing parking structure at 376 Larkin Street would be accessed via Larkin Street. A doubling of traffic is needed to audibly increase traffic noise.

333 Golden Gate Avenue

The academic facility at 333 Golden Gate Avenue would replace the College's existing primary academic space. As discussed in Section 4.8, Transportation, this replacement would not increase PM peak hour vehicle trips. Therefore, development of 333 Golden Gate Avenue would not increase mobile noise.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Variant A would increase PM peak hour trips to 114 trips. These trips would be spread throughout the roadway network. An additional 40 PM peak hour trips would not double traffic volumes on any roadway. Therefore, Variant A would result in a less-than-significant impact related to mobile noise.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

Variant B would increase PM peak hour trips to 124. These trips would be spread throughout the roadway network. An additional 50 PM peak hour trips would not double traffic volumes on any roadway. Therefore, Variant B would result in a less-than-significant impact related to mobile noise.

100 McAllister Street

According to the traffic analysis, renovating 100 McAllister Street to include additional residential units would lead to an increase of 8 daily peak-hour vehicle trips. More students would walk to campus instead of driving, which would decrease noise emissions. There would be minimal potential for the renovation of 100 McAllister Street to generate additional mobile source noise.

Stationary Sources. The proposed LRCP would not include stationary sources of noise other than standard building features. These include emergency generators, building heating, ventilation, and air conditioning systems, backup generators, and fire pumps.

333 Golden Gate Avenue

The new building at 333 Golden Gate Avenue would include operational sources of noise typical to the existing urban environment. There would not be unusually loud sources of noise that would expose nearby land uses to excessive noise levels. Depending on the size of the equipment, heating and ventilation systems (HVAC) and other mechanical equipment can produce sound levels in the range of 70 to 75 dBA at 50 feet. As previously discussed, existing noise levels adjacent to 333 Golden Gate Avenue range from 65.8 to 68.5 dBA L_{eq}. New HVAC equipment located on the property line of the 333 Golden Gate Avenue could increase existing noise levels by 9.2 dBA. This would exceed the 8-dBA significance threshold. MM-NO-2, Mechanical Equipment Noise Reduction, would require rooftop mechanical equipment on buildings developed under the LRCP to be enclosed, screened, or otherwise controlled to reduce noise levels at the property line by at least 5 dBA. With implementation of MM-NO-2, mechanical noise increases would be less than 8 dBA, and would be less than significant. In addition, based on field visits to the campus, mechanical equipment noise at existing and academic residential facilities is not audible beyond the property line of the buildings. Therefore, development at 333 Golden Gate Avenue would result in a less-than-significant impact related to operational noise.

MM-NO-2: Mechanical Equipment Noise Reduction

Rooftop mechanical equipment at buildings developed under the LRCP shall be enclosed, screened, or otherwise controlled, to reduce noise at the property lines by at least 5 dBA.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Similar to the discussion for the new building at 333 Golden Gate Avenue, Variant A would not include unusual sources of mechanical equipment noise in an urban environment. Existing noise levels adjacent to Variant A range from 63.7 to 70.5 dBA L_{eq}. New HVAC equipment located on the property line could increase existing noise levels by 11.3 dBA. This would exceed the 8 dBA significance threshold. MM-NO-2 would require rooftop mechanical equipment on buildings developed under the LRCP to be enclosed, screened, or otherwise controlled to reduce noise levels at the property line by at least 5 dBA. With implementation of MM-NO-2, mechanical noise increases would be less than 8 dBA, and would be less than significant. In addition, based on visits to the campus, mechanical equipment noise at existing academic and residential facilities is not audible past the property line of the buildings. Therefore, Variant A would result in a less-than-significant impact related to operational noise.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

Similar to the discussion for the new building at 333 Golden Gate Avenue, Variant B would not include unusual sources of mechanical equipment noise in an urban environment. Existing noise levels adjacent to Variant B range from 63.7 to 70.5 dBA L_{eq}. New HVAC equipment located on the property line could increase existing noise levels by 11.3 dBA. This would exceed the 8 dBA significance threshold. MM-NO-2 would require rooftop mechanical equipment on buildings developed under the LRCP to be enclosed, screened, or otherwise controlled to reduce noise levels at the property line by at least 5 dBA. With implementation of MM-NO-2, mechanical noise increases would be less than 8 dBA, and would be less than significant. In addition, based on visits to the campus, mechanical equipment noise at existing academic and residential facilities is not audible past the property line of the buildings. Therefore, Variant B would result in a less-than-significant impact related to operational noise.

100 McAllister Street

As with the new building at 333 Golden Gate Avenue, renovation of 100 McAllister Street would not include unusual sources of mechanical equipment noise in an urban environment. Existing noise levels near 100 McAllister Street range from 63.7 to 70.5 dBA L_{eq}. If required as part of 100 McAllister Street renovation, new equipment located on the property line could increase existing noise levels by 11.3 dBA. This would exceed the 8 dBA significance threshold. MM-NO-2 would require any new rooftop mechanical equipment to be enclosed, screened, or otherwise controlled to reduce noise levels at the property line by at least 5 dBA. With implementation of MM-NO-2, mechanical noise increases would be less than 8 dBA, and would be less than significant.

In addition, based on site visits, mechanical equipment noise at existing academic and residential facilities is not audible past the property line of the buildings. Therefore, renovation of 100 McAllister Street would result in a less-than-significant impact related to operational noise.

Impact NO-2 The project would result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. ***Significant and Unavoidable Impact***

Construction

Construction activity can generate varying degrees of vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels.

In most cases, the primary concern regarding construction vibration relates to damage to buildings. Activities that can result in damage include demolition and drilling in close proximity to sensitive structures. Typical vibration levels associated with construction equipment are provided in Table 4.7-5, Vibration Velocities for Construction Equipment. Heavy equipment (e.g., a large bulldozer) generates vibration levels of 0.089 inch per second at a distance of 25 feet. It is expected that foundation piles would be placed through predrilling, and impact pile-driving would not be used during construction of LRCP development projects.

Table 4.7-5: Vibration Velocities for Construction Equipment

Equipment	PPV at 25 feet (Inches/Second)	VdB at 25 feet (Micro-Inches/Second)
Jackhammer	0.035	79
Large Bulldozer	0.089	87
Caisson Drill	0.089	87
Loaded Trucks	0.076	86
Small Bulldozer	0.003	58
Pile Driver	0.644	104
Source: Federal Transit Administration. 2006. Transit Noise and Vibration Impact Assessment.		

333 Golden Gate Avenue

Construction of the new academic building at 333 Golden Gate Avenue would involve the use of heavy equipment, including a jackhammer to break up pavement. Buildings that would be most susceptible to vibration-related impacts are the mixed-use residences and the historic Civic Center Powerhouse. These receptors would be located within 10 to 120 feet of construction activity.

Heavy construction equipment (e.g., large bulldozers and loaded trucks) frequently generates between 86 and 87 VdB at 25 feet. On-site and adjacent sensitive receptors within the nearest buildings would experience peak levels of 99 VdB during those instances when heavy construction equipment moves adjacent to the façades of the existing buildings (within about 10 feet). Equipment used at distances greater than 45 feet from existing structures would cause vibration levels below 80 VdB. However, daytime construction activity adjacent to residences to the south would generate vibration levels that exceed the annoyance threshold. MM-NO-3, Construction Vibration Reduction, would reduce human annoyance caused by vibration by providing a community liaison to respond to and address complaints. Therefore, with mitigation, daytime construction activity associated with 333 Golden Gate Avenue would result in a less-than-significant vibration impact.

If nighttime construction activities were required, construction vibration during the 8:00 p.m. to 7:00 a.m. period that exceeds 80 VdB at residential land uses would result in a significant and unavoidable impact despite the implementation of MM-NO-3, Construction Vibration Reduction.

Regarding building damage, the appropriate significance thresholds are 0.12 PPV for historic structures, and 0.3 PPV for engineered concrete and masonry (no plaster) buildings, such as the adjacent buildings. As discussed in Section 4.3, Cultural Resources, two historic resources on the same block as the proposed building at 198 McAllister Street include the apartment/hotel building at 132–154 McAllister Street, adjacent to the east, and 255 Golden Gate Avenue, located approximately 35 feet north. Construction activities associated with 333 Golden Gate Avenue would not create vibration conditions that would affect those resources. The Civic Center Powerhouse would be 120 feet from construction activity, and the vibration level would be 0.008 PPV. This would be less than the 0.12 PPV significance threshold for historic structures.

Vibration levels at adjacent residential buildings would be 0.35 PPV at the property line. This would exceed the 0.3 PPV significance threshold. MM-NO-3 would avoid damage caused by vibration by implementing a pre-construction assessment and, if needed, monitoring would be performed during vibration-causing activities to detect ground settlement or lateral movement of structures. Therefore, with implementation of MM-NO-3, construction activity associated with 333 Golden Gate Avenue would result in less-than-significant vibration-related impacts associated with potential building damage.

MM-NO-3: Construction Vibration Reduction

UC Hastings shall designate a dedicated public liaison who shall be responsible for addressing public concerns about construction activities, including excessive noise and vibration (see MM-NO-1). The public liaison shall determine the cause of the concern and shall work with the construction contractor to implement feasible, reasonable measures to address the concern.

For any construction activities during the 8:00 p.m. to 7:00 a.m. period that would exceed 80 VdB at residential land uses, UC Hastings shall ensure that advance notice is provided to residences and hotels within 300 feet of the construction site.

The Noise Control Plan required with MM-NO-1 shall include measures to reduce vibration exposure to the extent feasible, and may include, but not be limited to:

- operating earth-moving equipment as far away from vibration-sensitive receptors as possible, and prioritizing use of smaller, lighter-duty equipment when operation is necessary within 45 feet of sensitive receptors in existing buildings; and

- phasing demolition and ground-disturbing activity to reduce occurrences in the same time period.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Each component of Variant A would be adjacent (within 10 feet) of existing residential structures and additional buildings. Renovation activities, such as those associated with 50 Hyde Street and 100 McAllister Street, would require less heavy equipment than new construction activities. However, renovation activities would still require some heavy equipment, and vibration levels associated with renovation have been assessed in a similar manner as new construction. As discussed in Section 4.3, Cultural Resources, two historic resources on the same block as the proposed building at 198 McAllister Street include the apartment/hotel building at 132–154 McAllister Street, adjacent to the east, and 255 Golden Gate Avenue, located approximately 35 feet north. As discussed previously, unmitigated construction activity would generate vibration levels that exceed the annoyance and damage significance thresholds. MM-NO-1, MM-NO-3, and Cultural Resources MM-CR-1, Prepare a Historic Property Protection Plan in Conjunction with Demolition and Construction Plans for 198 McAllister Street or 50 Hyde Street, would mitigate vibration annoyance and damage caused by construction activities. Therefore, with implementation of mitigation measures, construction activity associated with Variant A would result in a less-than-significant vibration impact associated with potential building damage.

As discussed previously for 333 Golden Gate Avenue, MM-NO-3 would reduce construction vibration effects. Therefore, with mitigation, daytime construction activity associated with Variant A would result in a less-than-significant vibration impact. If nighttime construction activities were required, construction vibration during the 8:00 p.m. to 7:00 a.m. period that exceeds 80 VdB at residential land uses would result in a significant and unavoidable impact despite the implementation of MM-NO-3.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

As with Variant A, Variant B would be adjacent (within 10 feet) of existing residential structures and additional buildings. Unmitigated construction activity would generate vibration levels that exceed the annoyance and damage significance thresholds. As discussed previously, MM-NO-1, MM-NO-3, and MM-CR-1 would mitigate vibration annoyance and damage caused by construction activities. Therefore, with implementation of mitigation measures, construction activity associated with Variant B would result in a less-than-significant vibration impact associated with potential building damage.

As discussed previously for 333 Golden Gate Avenue, MM-NO-3 would reduce construction vibration effects. Therefore, with mitigation, daytime construction activity associated with Variant B would result in a less-than-significant vibration impact. If nighttime construction activities were required, construction vibration during the 8:00 p.m. to 7:00 a.m. period that exceeds 80 VdB at residential land uses would result in a significant and unavoidable impact despite the implementation of MM-NO-3.

100 McAllister Street

Renovation activities, such as those associated with 100 McAllister Street, would require less heavy equipment than new construction activities. However, renovation activities would still require some heavy equipment, and vibration levels associated with renovation have been assessed in a similar manner as new construction. Unmitigated construction activity would generate vibration levels that exceed the annoyance and damage significance thresholds. As discussed previously, MM-NO-1 and MM-CR-1 would mitigate vibration annoyance and damage caused by construction activities. Therefore, with mitigation, construction activity associated with 100 McAllister Street would result in a less-than-significant vibration impact. Because construction activity would primarily be interior renovation, it would be expected that there would be minimal potential for construction vibration impacts that would exceed 80 VdB noise levels. Implementation of MM-NO-3 would reduce construction vibration impacts to a less-than-significant level.

Operation

333 Golden Gate Avenue

333 Golden Gate Avenue would not include significant stationary sources of vibration, such as heavy equipment operation. Operational vibration in the project vicinity would be generated by vehicular travel on the local roadways. However, traffic-related vibration levels would not be perceptible to sensitive receptors. Therefore, operational activity associated with 333 Golden Gate Avenue would result in a less-than-significant vibration impact.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

As with 333 Golden Gate Avenue, Variant A would not include significant stationary sources of vibration. Therefore, operational activity associated with Variant A would result in a less-than-significant vibration impact.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

As with 333 Golden Gate Avenue, Variant B would not include significant stationary sources of vibration. Therefore, operational activity associated with Variant B would result in a less-than-significant vibration impact.

100 McAllister Street

Interior renovation of 100 McAllister Street would not result in new sources of vibration. There would be no potential for 100 McAllister Street to generate additional sources of vibration.

Impact NO-3 The project could result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. ***Less than Significant with Mitigation***

Potential permanent increases in ambient noise levels were assessed previously for mobile and stationary sources. Development with the LRCP would not generate new vehicle trips in the vicinity such that traffic noise would increase audibly. Traffic noise effects would be less than significant. Without mitigation, mechanical equipment noise on new structures could substantially increase permanent noise levels. Impacts related to mechanical equipment noise would be reduced to a less-than-significant level with implementation of MM-NO-2.

Impact NO-4 The project could result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. ***Less than Significant with Mitigation***

Potential temporary increases in ambient noise levels associated with construction activity are assessed in Impact NO-1. Without mitigation, equipment noise levels would exceed 80 dBA at 100 feet. MM-NO-1, Noise Reduction, includes, for example, construction barriers and best available noise-control techniques to reduce construction equipment noise levels. Based on a conservative noise reduction of 3 dBA from MM-NO-1, construction equipment-related noise at 100 feet would be reduced to at least 80 dBA L_{eq}. Noise impacts related to construction would be reduced to a less-than-significant level with implementation of MM-NO-1.

Impact NO-5 The project would not be substantially affected by existing noise levels. ***Less-than-Significant Impact***

For this analysis, the Land Use Compatibility chart in the city's General Plan Noise Element (see Figure 4.7-3) is used to assess the appropriate placement of new sensitive land uses. The General Plan indicates that educational facilities and residences would be properly located in existing noise environments of up to 70 dBA L_{dn} if a detailed analysis of noise-reduction requirements is completed and necessary noise insulation features are included in building design. For the determination of additional noise insulation features, the analysis uses 52 dBA L_{eq} inside classrooms, per Caltrans guidance, and 45 dBA L_{dn} in a multi-family residence, per Title 24 requirements.

333 Golden Gate Avenue

The monitored noise level at 333 Golden Gate Avenue was 65.8 dBA L_{eq} (Table 4.7-1). Typical building construction (e.g., single-glazed windows) provides a minimum noise reduction of approximately 25 dBA.[8] It was assumed that the building would be constructed with a fresh air supply system, and windows could be closed if exterior noise levels were disruptive. Based on

[8] Federal Highway Administration. 2011. *Highway Traffic Noise: Analysis and Abatement Guidance*.

the 25 dBA reduction, it is anticipated that the interior noise levels at classrooms would be less than 42 dBA L_{eq}, and noise levels would not exceed the 52-dBA L_{eq} standard. Therefore, educational facilities at 333 Golden Gate Avenue would not be substantially affected by existing noise levels.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

The existing land uses at 50 Hyde Street and 100 McAllister Street would not change in function, and there would be no potential for new receptors to be exposed to incompatible noise levels. New construction and rehabilitation would be based on current construction standards that would provide increased protection from exterior noise. In addition, certain housing projects would also be built with fresh air supply. This would allow windows to be closed when exterior noise levels become excessive. As discussed previously, educational facilities at 333 Golden Gate Avenue would not be exposed to incompatible noise levels. Regarding new campus housing at 198 McAllister Street, the long-term monitored noise level in the project vicinity was 69.2 dBA L_{dn} (see Table 4.7-1). Based on the 25 dBA reduction described above, it is anticipated that the interior noise levels would be 44.2 dBA L_{dn}, and noise levels would not exceed the 45 dBA L_{dn} standard. Therefore, housing at 198 McAllister Street with Variant A would not be substantially affected by existing noise levels.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

Variant B would only differ in the analysis presented for Variant A in that 50 Hyde Street would be new campus housing, with some academic and support space. The long-term monitored noise level in the project vicinity was 69.2 dBA L_{dn} (see Table 4.7-1). Based on the 25 dBA reduction described above, it is anticipated that the interior noise levels would be 44.2 dBA L_{dn}, and noise levels would not exceed the 45 dBA L_{dn} standard. Therefore, land uses associated with Variant B would not be substantially affected by existing noise levels.

100 McAllister Street Renovation

The long-term monitored noise level at 100 McAllister Street was 69.2 dBA L_{dn} (see Table 4.7-1). Based on the 25 dBA reduction described above, it is anticipated that the interior noise levels would be 44.2 dBA L_{dn}, and noise levels would not exceed the 45 dBA L_{dn} standard. Campus housing at 100 McAllister Street would not be substantially affected by existing noise levels.

4.7.3 Cumulative Impacts

Cumulative impacts would include the construction- and operation-related noise and vibration impacts that would result from the incremental impact of the development under the LRCP and other nearby projects. Cumulative construction noise and vibration impacts are localized impacts, with noise impacts typically limited to within 500 feet of the source and vibration impacts typically limited to within 25 feet of the source.

Current pending projects within 500 feet of the UC Hastings campus include the following:

- 101 Hyde Street: Proposed demolition of an existing building and construction of an eight-story, 85-unit residential building, approximately 100 to 200 feet from 200 McAllister Street, 333 Golden Gate Avenue, and 50 Hyde Street.
- 361 Turk Street: Proposed new construction of a nine-story, approximately 80-foot-tall residential building containing 137 group housing rooms and ground floor retail space, approximately 300 feet north of 100 McAllister Street, 50 Hyde Street, and 198 McAllister Street.
- 145 Leavenworth Street: Proposed new construction of an eight-story, approximately 80-foot-tall residential building containing 94 group housing rooms and ground floor retail space, located approximately 300 feet northeast of 100 McAllister Street, 50 Hyde Street, and 198 McAllister Street.

Construction

Construction activity in the vicinity of the project—including demolition, excavation, and building construction activities—could occur in conjunction with other planned and foreseeable projects. Construction noise is a localized impact that reduces as distance from the source increases. Intervening features, such as buildings, increase the attenuation of noise with distance by providing barriers to sound wave propagation. As with noise effects, vibration impacts are localized because vibration attenuates rapidly from the source. Implementation of MM-NO-1 would reduce project-related daytime noise levels, and in turn, would reduce daytime cumulative noise levels. Noise from project-related construction truck trips could combine with noise from trucks associated with the other nearby development projects. However, due to the urban nature of the area and existing ambient daytime noise levels from traffic on roadways adjacent to and near the LRCP development sites, any cumulative increase in ambient daytime noise levels from construction-related traffic would be brief, moderate, and intermittent in nature. Therefore, project-related daytime construction noise and vibration impacts would be less than significant in a cumulative scenario.

Certain construction activities may be necessary between 8:00 p.m. and 7:00 a.m. Nearby residences and hotels are sensitive to increased nighttime noise and vibration. Although unlikely due to construction schedules and requirements for nighttime construction, it is possible that LRCP-related nighttime construction activity would overlap with nighttime activity approved for related projects or public projects in the roadway right-of-way. In this case, cumulative noise and vibration associated with LRCP and other projects would interfere with sleep activities at residences and hotels. Therefore, LRCP-related nighttime construction noise and vibration impacts would be significant and unavoidable in a cumulative scenario.

Operation

Other development in the vicinity of the UC Hastings campus would generate operational noise and could contribute to an overall increase in ambient noise levels in the area. The noise environment of the area would be influenced by traffic increases and stationary or fixed sources of noise that would be developed as part of past, present, and reasonably foreseeable future development, such as new heating and ventilation equipment, emergency power generators, and other mechanical equipment. As discussed in Impact NO-1, development under the LRCP would result in less-than-significant impacts related to stationary noise. Cumulative projects in the LRCP vicinity would be expected to include standard measures related to incorporation of appropriate noise insulation design features (e.g., installation of relatively quiet models of mechanical equipment, orientation or shielding to protect sensitive uses, and installation within an enclosure) in their respective project designs, which would ensure that noise impacts from stationary and operational sources would be less than significant.

Development under the LRCP would not double traffic volumes on any roadway, and therefore, the LRCP would not result in a considerable contribution to stationary or traffic noise levels in the project vicinity. The LRCP would not result in any operational sources of vibration. Therefore, development under the LRCP would not result in cumulatively considerable operational noise and vibration impacts.

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4.8 TRANSPORTATION

This section describes the existing transportation setting and provides a transportation impact analysis for proposed LRCP development at UC Hastings. The transportation impact analysis evaluates the LRCP's potential impacts on traffic conditions, transit operations, bicycle conditions, pedestrian conditions, loading operations, emergency access, construction activities, and parking conditions.[1]

On January 20, 2016, under SB 743 passed in 2013, the OPR released a revised proposal for changes to the CEQA Guidelines that will amend the way transportation impacts are analyzed (Public Resources Code Section 21099). Specifically, SB 743, codified as Public Resources Code Section 21099, requires OPR to amend the CEQA Guidelines to provide an alternative to Level of Service (LOS) for evaluating transportation impacts. Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." Once the CEQA Guidelines are amended to include those alternative criteria, auto delay will no longer be considered a significant impact under CEQA. Because the amended CEQA Guidelines are still under review, the transportation discussion herein presents LOS analysis. However, the impact conclusions note the expected guideline changes under SB 743.[2]

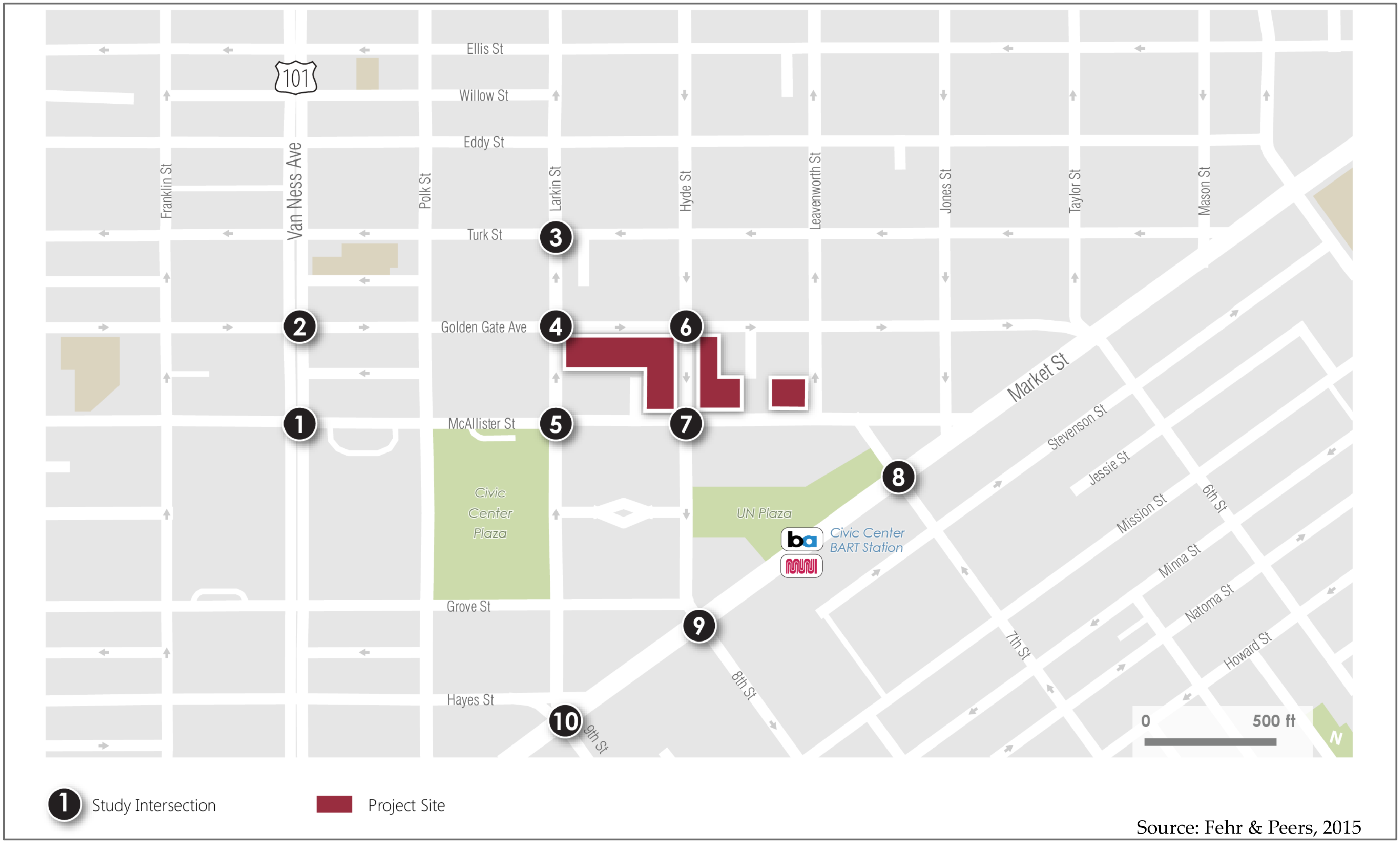
SB 743 also eliminates the need to evaluate parking impacts of projects proposed in a transit priority area. Parking effects are reviewed for informational purposes.

4.8.1 Setting

This section describes the existing transportation and circulation setting in the vicinity of the UC Hastings campus, including the existing roadway network, intersection operating conditions, transit network and service, pedestrian conditions, bicycle conditions, on-street loading, emergency access, and existing on-street parking supply and occupancy. Figure 4.8-1, LRCP Location and Study Intersections, shows the study area.

[1] This section is based on University of California Hastings College of the Law Long Range Campus Plan Transportation Analysis, Fehr & Peers Transportation Consultants. March 2016.

[2] Particularly within areas served by transit, implementation of SB 743 must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Public Resources Code Section 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated." Once the CEQA Guidelines are amended to include these alternative criteria, auto delay will no longer be considered a significant impact under CEQA.



Source: Fehr & Peers, 2015

FIGURE 4.8-1: LRCP LOCATION AND STUDY INTERSECTIONS

Roadway Facilities

Regional Access

Regional roadway access to the UC Hastings campus is provided by several major freeways and highways, including Interstate (I-)80, I-280, and U.S. 101. I-80, approximately 0.6 mile southeast of the campus, provides primary regional access connecting San Francisco to the East Bay via the San Francisco-Oakland Bay Bridge. I-280, approximately 1.5 miles southeast of the campus, connects San Francisco to the South Bay and Peninsula. U.S. 101 provides regional access within San Francisco via Van Ness Avenue and Lombard Street, approximately 0.2 mile west and 1.45 miles north of the campus, respectively.

Local Access

Key local roadways in the vicinity of UC Hastings are described as follows:

- *Market Street* – Market Street is the primary, and multi-modal, transit route through San Francisco, as well as in the LRCP area. Market Street operates as a two-way arterial with two travel lanes in each direction. No street parking is allowed along Market Street. The center lanes operate primarily as transit lanes, and accommodate Muni historic streetcar service, with island and curbside transit stops in both directions. The eastbound center lane is officially designated as a transit-only lane (buses and taxis only) in the LRCP area. The curbside lanes operate as shared (general purpose) lanes, and accommodate general vehicular traffic, transit vehicles accessing curbside stops along Market Street, and bicycles. Market Street is a designated Class III Bikeway in the LRCP area.

- *Turk Street* – Turk Street runs one-way westbound with three travel lanes, has street parking on both sides, and provides Muni transit routes.

- *Golden Gate Avenue* – Golden Gate Avenue runs one-way eastbound with three travel lanes, has street parking on both sides, and provides Muni transit routes.

- *McAllister Street* – McAllister Street has three lanes in the LRCP area, and runs in the eastbound and westbound directions. Street parking is available in the westbound direction. McAllister Street also serves Muni transit routes, and is a designated Class II Bikeway adjacent to the LRCP area.

- *Grove Street* – Grove Street has two travel lanes in the LRCP area, and runs in the eastbound and westbound directions. Street parking is available in both directions. Grove Street also serves Muni transit routes, and is a designated Class II Bikeway in the LRCP area.

- *Jones Street* – Jones Street runs one-way southbound, with three travel lanes and street parking on both sides.

- *Leavenworth Street* – Leavenworth Street runs one-way northbound, with three travel lanes and street parking on both sides.
- *Hyde Street* – Hyde Street runs one-way southbound, with three travel lanes and street parking on both sides.
- *Larkin Street* – Larkin Street runs one-way northbound, with three travel lanes and street parking on both sides. Larkin Street also provides Muni transit routes, and is a designated Class II Bikeway south of the LRCP area.
- *Polk Street* – Polk Street has two travel lanes, and runs in the northbound and southbound direction, with street parking in both directions. South of Grove Street, Polk Street is one-way southbound. Polk Street also serves Muni transit routes, and is a designated Class II Bikeway in the LRCP area.
- *Van Ness Avenue* – Van Ness Avenue (U.S. 101), is the major north-south arterial in the central section of San Francisco. Van Ness Avenue has three travel lanes in each direction separated by a center median, and has metered parking on both sides of the street. Van Ness Avenue also serves Muni transit routes.
- *Seventh Street* – Seventh Street runs one-way northbound with four travel lanes, serves Muni transit routes, and is a designated Class II Bikeway.
- *Eighth Street* – Eighth Street runs one-way southbound with four travel lanes, serves Muni transit routes, and is a designated Class II Bikeway.
- *Ninth Street* – Ninth Street runs one-way northbound with four travel lanes, and provides Muni transit routes.

Intersection Operation Conditions

As previously stated, implementation of SB 743 will amend methodologies for evaluating transportation impacts to no longer include LOS. However, because the CEQA guidelines have not yet been formally amended, this analysis evaluates the operating characteristics of intersections using LOS. LOS is a quantitative description of an intersection's performance based on the average delay per vehicle. Intersection levels of service range from LOS A, which indicates free flow or excellent vehicle flow conditions with short delays, to LOS F, which indicates congested or overloaded vehicle flow conditions with extremely long delays. In San Francisco, LOS A through D are currently considered acceptable, and LOS E and LOS F are currently considered unsatisfactory service levels.

The analysis evaluates the operational roadway characteristics during the weekday PM peak hour traffic periods between 4:00 p.m. and 6:00 p.m. Figure 4.8-1, LRCP Location and Study Intersections, shows the ten study intersections. Figure 4.8-2, Existing PM Peak-Hour Traffic

Volumes and Lane Configurations, displays the existing PM peak hour traffic volumes for those intersections, as well as existing lane configurations and traffic controls (signals, stop signs, etc.). Table 4.8-1, PM Peak Hour Intersection Levels of Service – Existing Conditions, presents LOS conditions for the study intersections. As shown in Table 4.8-1, all 10 study intersections operate at acceptable LOS in the PM peak hour.[3]

Table 4.8-1: PM Peak Hour Intersection Levels of Service – Existing Conditions

Intersection	Traffic Control	Average Delay	LOS
1. Van Ness Ave & McAllister Street	Signalized	20	B
2. Van Ness Ave & Golden Gate Ave	Signalized	22	C
3. Turk Street & Larkin Street	Signalized	18	B
4. Golden Gate Ave & Larkin Street	Signalized	13	B
5. McAllister Street & Larkin Street	Signalized	< 10	A
6. Hyde Street & Golden Gate Ave	Signalized	13	B
7. Hyde Street & McAllister Street	Signalized	15	B
8. Market Street & Seventh Street	Signalized	20	C
9. Market Street & Eighth Street/ Hyde Street	Signalized	49	D
10. Market Street & Ninth Street/Hayes Street/Larkin Street	Signalized	23	C

Notes: Bold indicates unacceptable LOS E or F.
Delay reported as seconds per vehicle.
LOS based on average intersection delay, based on the methodology in the Highway Capacity Manual, 2000.
Source: Fehr & Peers, 2016

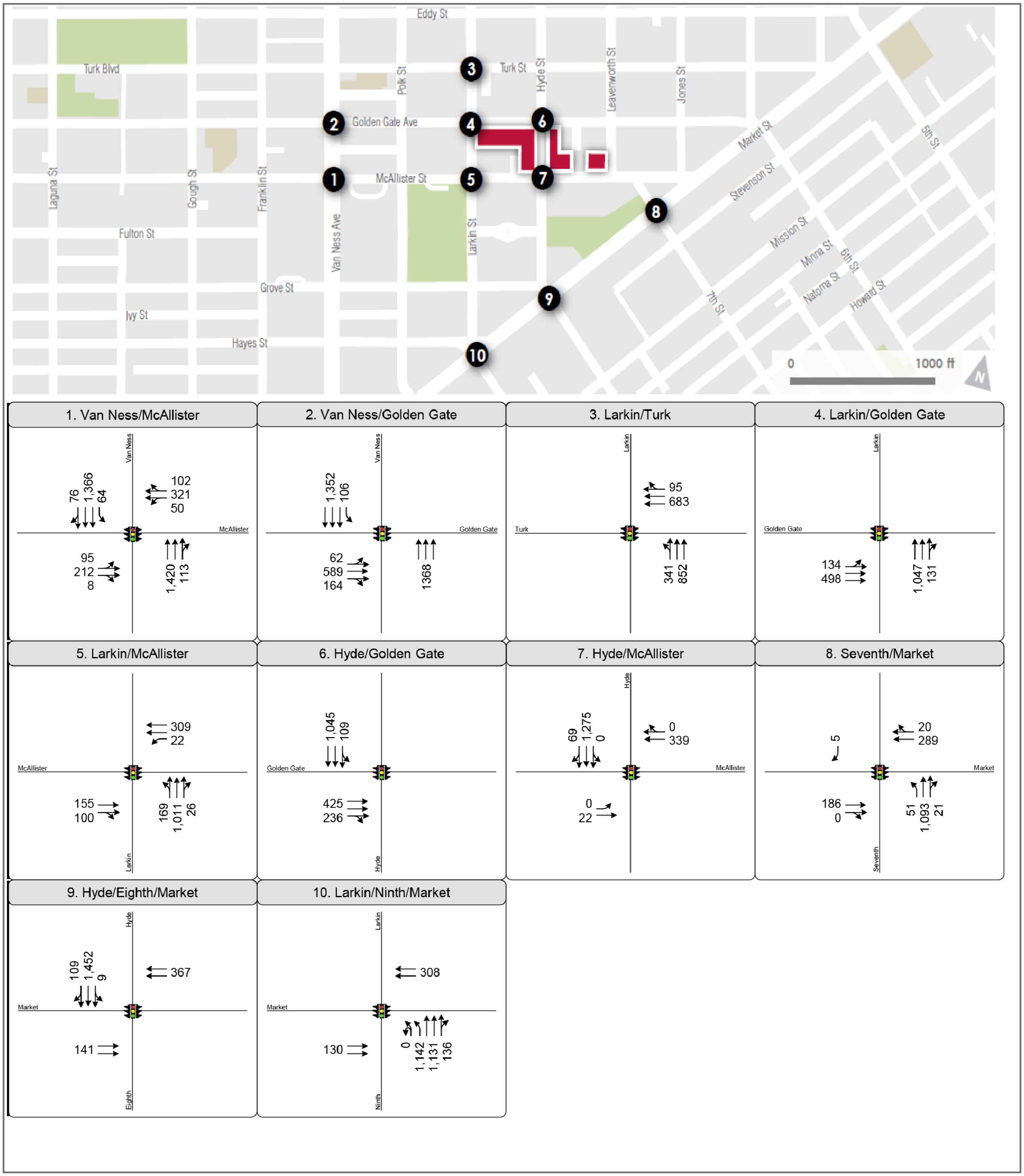
Transit

The UC Hastings campus is well served by public transit, with bus, streetcar, Muni Metro light rail, and Bay Area Rapid Transit (BART) regional rail available in the surrounding area. Figure 4.8-3, Existing Transit Routes, shows available Muni and BART transit within a 0.25-mile radius.

San Francisco Municipal Transportation Agency

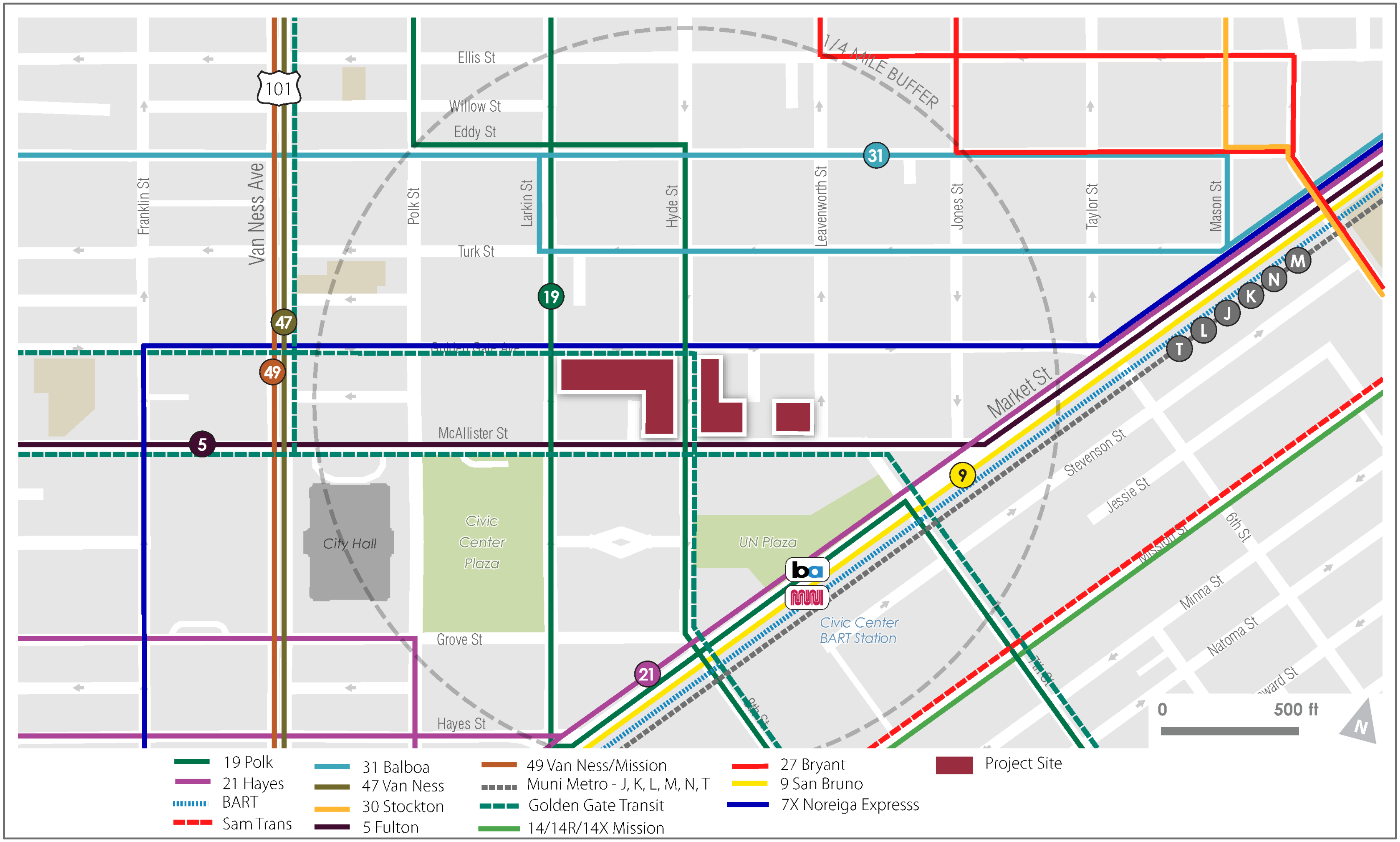
Primary transit access to the campus is provided by San Francisco Municipal Transportation Agency (SFMTA) Muni service, which also provides connections to other modes of transit in the area. Muni transit routes within a 0.25-mile radius are shown in Table 4.8-2, Local Muni Operations.

[3] Fehr & Peers Transportation Consultants. 2016. *University of California Hastings College of the Law Long Range Campus Plan Transportation Analysis*, Appendix 4.7-A, and Appendix 4.7-B. March.



Source: Fehr & Peers, 2015

FIGURE 4.8-2: EXISTING PM PEAK-HOUR TRAFFIC VOLUMES AND LANE CONFIGURATIONS



Source: Fehr & Peers, 2016

FIGURE 4.8-3: EXISTING TRANSIT ROUTES

Table 4.8-2: Local Muni Operations

Route	AM Peak Weekday Headways (7 a.m. - 9 a.m.)	Midday Peak Weekday Headways (12 p.m. - 2 p.m.)	PM Peak Weekday Headways (4 p.m. - 7 p.m.)	Hours of Operation	Nearest Stop Location	Distance to Project site[1]	Neighborhoods Served by Route
5 Fulton	9 min	10 min	10 min	2:30 a.m. - 2:00 a.m.	McAllister and Hyde	0.1 mile	Richmond, Western Addition, Civic Center, SoMa
5 Fulton Rapid	6 min	7 min	8 min	7:00 AM - 8:00 p.m.	McAllister and Jones	0.2 mile	Richmond, Western Addition, Civic Center, SoMa
7 Haight/ Noriega	8 min	No Service	8 min	6:30 a.m. - 9:30 a.m. 4:00 p.m. - 7:00 p.m.	Golden Gate and Hyde	<0.1 mile	Sunset, Market Street, Downtown
9 San Bruno	12 min	12 min	12 min	5:00 a.m. - 1:00 a.m.	Market and Eighth	0.2 mile	Visitacion Valley, Potrero Hill, Market Street
9 San Bruno Rapid	8 min	8 min	8 min	6:30 a.m. - 8:00 p.m.	Market and Eighth	0.2 mile	Visitacion Valley, Potrero Hill, Market Street
19 Polk	15 min	15 min	15 min	5:15 a.m. - 12:45 a.m.	Market and Seventh	0.2 mile	Russian Hill, Nob Hill, Civic Center, SoMa, Potrero Hill, Bayview, Hunters Point
21 Hayes	9 min	12 min	10 min	5:00 a.m. - 1:00 a.m.	Market and Seventh	0.2 mile	North Panhandle, Civic Center, Market Street
31 Balboa	12 min	15 min	15 min	4:30 a.m. - 1:30 a.m.	Turk and Hyde	0.1 mile	Financial District, Downtown, Civic Center, Western Addition, Inner Richmond, Outer Richmond, Lincoln Park
47 Van Ness	10 min	9 min	10 min	6:00 a.m. - 12:45 a.m.	McAllister and Van Ness	0.3 mile	Telegraph Hill, North Beach, Russian Hill, Nob Hill, Downtown, Civic Center, SoMa
49 Van Ness/ Mission	8 min	9 min	9 min	4:00 a.m. - 1:00 a.m.	McAllister and Van Ness	0.3 mile	City College, Balboa Park, Mission, Van Ness Avenue, Fort Mason

Route	AM Peak Weekday Headways (7 a.m. - 9 a.m.)	Midday Peak Weekday Headways (12 p.m. - 2 p.m.)	PM Peak Weekday Headways (4 p.m. - 7 p.m.)	Hours of Operation	Nearest Stop Location	Distance to Project site[1]	Neighborhoods Served by Route
J Church	9 min	10 min	9 min	4:30 a.m. - 1:30 a.m.	Market and Eighth	0.2 mile	Balboa Park, Castro, Market Street
KT Ingleside-Third	9 min	10 min	9 min	4:30 a.m. - 2:00 a.m.	Market and Eighth	0.2 mile	Balboa Park, Market Street, Visitacion Valley
L Taraval	8 min	10 min	8 min	4:30 a.m. - 1:30 a.m.	Market and Eighth	0.2 mile	Parkside, West Portal, Market Street
M Ocean View	9 min	10 min	9 min	4:15 a.m. - 1:30 a.m.	Market and Eighth	0.2 mile	Balboa Park, West Portal, Market Street
N Judah	7 min	10 min	7 min	4:30 a.m. - 2:00 a.m.	Market and Eighth	0.2 mile	Ocean Beach, Market Street, Caltrain

Note:
1. Distances are approximate and are measured from the center of the UC Hastings campus along local streets to reach nearest stop.
Source: SF Muni, 2015; 511.org, 2015; Prepared by Fehr & Peers, 2015.

Existing Muni Ridership Data

The availability of existing local and regional transit service near UC Hastings was analyzed using the screenline method to determine if screenline corridors in the LRCP area have adequate capacity to serve demand operating at or below the 85 percent capacity utilization threshold.

Table 4.8-3, Muni Downtown Screenlines – Existing Conditions, presents the existing ridership and capacity utilization at the maximum loading point for the routes crossing the four downtown screenlines. While most corridors within the screenlines operate under the 85 percent performance standard, two exceed this threshold, including the Northwest Fulton/Hayes Screenline (89 percent), and the Southeast Third Street Screenline (99 percent).

Table 4.8-3: Muni Downtown Screenlines - Existing Conditions

Outbound Screenline	PM Peak Hour[1] Ridership	PM Peak Hour[1] Capacity	PM Peak Hour[1] Capacity Utilization
Kearny/Stockton	2,245	3,327	67%
Other lines	683	1,078	63%
Northeast Screenline Total	2,928	4,405	66%
Geary	1,964	2,623	75%
California	1,322	1,752	75%
Sutter/Clement	425	630	67%
Fulton/Hayes	**1,184**	**1,323**	**89%**
Balboa	625	974	64%
Northwest Screenline Total	5,519	7,302	76%
Third Street	**782**	**793**	**99%**
Mission	1,407	2,601	54%
San Bruno/Bayshore	1,536	2,134	72%
Other lines	1,084	1,675	65%
Southeast Screenline Total	4,810	7,203	67%
Subway lines	4,904	6,164	80%
Haight/Noriega	977	1,554	63%
Other lines	555	700	79%
Southwest Screenline Total	6,435	8,418	76%
Total All Screenlines	19,693	27,328	72%

Notes:
PM peak hour; outbound (i.e. away from Downtown) only
Source: San Francisco Planning Department, May 2015; Fehr & Peers, 2015.

Recent and Proposed Changes to Local Transit

In March 2014, the SFMTA Board of Directors approved many recommendations designed to make Muni service more reliable, quicker, and more frequent; these recommendations emerged from the Muni Forward project, a review of the city's public transit system. These recommendations include new routes and route extensions, service-related capital improvements, more service on busy routes, designation of rapid transit routes and travel time reduction proposals on those routes, and elimination or consolidation of certain routes or route segments with low ridership. The Muni Forward Implementation Strategy anticipates that many of the service improvements will be implemented between 2016 and 2017, pending resource availability.

Regional Transit Service

In addition to Muni operations, the following regional transit services operate within San Francisco and are accessible from the UC Hastings campus:

- *BART* – Provides regional rail service between the East Bay, San Francisco, and San Mateo County. The nearest station is the Civic Center Station, approximately 500 feet south.

- *Caltrain* – Provides passenger rail service on the Peninsula between San Francisco and San Jose. The nearest station is the Fourth/King Station, approximately 1.3 miles south

- *Alameda-Contra Costa County Transit District (AC Transit)* – Provides bus service between Alameda, Contra Costa, and San Mateo Counties, and San Francisco. The nearest station is the Transbay Terminal, temporarily located at Howard Street and Beale Street, which is accessible from BART and Muni.

- *San Mateo County Transit District (SamTrans)* – Provides bus and rail service (through Caltrain) in San Mateo County, with select routes providing transit service to downtown San Francisco. The nearest stop is approximately 0.5 mile south, at Seventh Street and Mission Street.

- *Golden Gate Transit (GGT)* – Provides bus and ferry service between the North Bay and San Francisco. The nearest GGT bus stop to the campus is located on Hyde Street, between Golden Gate Avenue and McAllister Street. Muni and BART lines connect UC Hastings to Golden Gate Transit ferry service at the Ferry Building via the Civic Center Station to Embarcadero Station.

Regional Transit Screenlines

Similar to Muni, regional transit service is examined on a screenline basis. Table 4.8-4, Regional Transit Screenlines – Existing Conditions, presents the ridership and capacity utilization at the maximum loading point for regional screenlines within San Francisco during the weekday PM peak hour. For regional transit providers, the established capacity utilization threshold is equal to the number of available seats (and in the case of BART, also standing area) (i.e., 100 percent of capacity). All regional screenlines operate within their established capacity utilization standards.

Table 4.8-4 Regional Transit Screenlines – Existing Conditions

Screenline	PM Peak Hour Ridership	PM Peak Hourly Capacity	Capacity Utilization
East Bay			
BART	19,716	22,050	89%
AC Transit	2,256	3,926	57%
Ferries	805	1,615	50%
Screenline Subtotal	22,777	27,591	83%
North Bay			
Golden Gate Transit Buses	1,384	2,817	49%
Ferries	968	1,959	49%
Screenline Subtotal	2,352	4,776	49%
South Bay			
BART	10,682	14,910	72%
Caltrain	2,377	3,100	77%
SamTrans	141	320	44%
Screenline Subtotal	13,200	18,330	72%
Regional Total	**38,330**	**50,697**	**76%**

Notes:
Whereas Muni threshold for overcrowding is 85% of capacity, each agency listed in this table has an overcrowding threshold of 100%. Therefore, none of the transit providers operate over their established load standard.
Source: San Francisco Planning Department, 2015; Fehr & Peers, 2015.

UC Hastings and UCSF Shuttle Services

UC Hastings provides an evening van escort service to transport students to locations in San Francisco, as listed in the Student Safety Handbook. The van service operates on-demand from 5:00 p.m. (6:00 p.m. during Daylight Savings Time) until 11:30 p.m. According to UC Hastings, students typically use the van service to reach bus and Muni transfer points. The van service may be scheduled by phone or in-person at the lobby of 200 McAllister Street.

UCSF operates several shuttle routes throughout San Francisco. The shuttle system fleet (currently 60 shuttles) provides service between transit facilities, remote parking lots, the various UCSF campus sites, and UCSF-affiliated hospitals/medical centers within the city. Most routes operate approximately between 6:00 a.m. and 9:00 p.m., Monday through Friday. The service is free for UCSF faculty, staff, students, patients, and visitors.

Two UCSF shuttle routes currently pass by the UC Hastings campus, but do not stop near the campus—the Blue route, which provides counterclockwise circulator service between the Mission Bay, Mount Zion, Parnassus, and San Francisco General Hospital campus sites, and the Gold route, which provides clockwise circulator service between the same locations. Each route operates at 20 minute headways approximately between 6:00 a.m. and 9:00 p.m.

Pedestrian Facilities

A qualitative evaluation of existing pedestrian conditions near the UC Hastings campus in October and November of 2015 included sidewalks, crosswalks, curb ramps, countdown timers, and pedestrian call buttons. All streets within the study area have sidewalks between 12 and 18 feet wide on all block faces. In addition, there are several pathways through United Nations Plaza, south of the UC Hastings campus, to transit stops on Market Street.

All intersections in the LRCP area have marked crosswalks at all crossings. Pedestrian countdown timers are present at all intersections near the UC Hastings campus. During the PM peak hour, an average of 1,680 crossings occurred at each intersection; with the majority of the UC Hastings campus pedestrian activity occurring at the intersection of Hyde Street and McAllister Street.

Bicycle Facilities

Bicycle facilities consist of bicycle lanes, trails, and paths, as well as bike parking, bike lockers, and showers for cyclists. On-street bicycle facilities are generally grouped into the following three categories:

- Class I: Provides a completely separated right-of-way for the exclusive use of cyclists and pedestrians with cross-flow minimized (e.g. off-street bicycle paths)
- Class II: Provides a striped lane for one-way travel on a street or highway
- Class III: Provides for shared use with motor vehicle traffic; however, are often signed or include a striped bicycle lane

The area surrounding the Hastings campus has an established bicycle network. Current on-street bicycle facilities in the UC Hastings area, as designated by the San Francisco Bike Plan (June 2009), are shown in Figure 4.8-4, Existing Bicycle Routes, listed below, and discussed in the following paragraphs.

- Route 20 – Class III facility along McAllister and Grove Streets with striped bicycle lane
- Route 23 – Class II facility along Seventh Street
- Route 25 – Class II facility along Larkin and Polk Streets

UC Hastings is located between the Civic Center and the Tenderloin neighborhoods, where the surrounding area is relatively flat. The Civic Center neighborhood has an established network of bicycle routes, although dedicated bicycle lanes are not provided on all routes, and along some routes during peak commute periods, bicyclists share the road with high volumes of traffic.

The campus includes two on-site bicycle parking facilities, located at the 200 McAllister Street and 198 McAllister Street buildings, totaling approximately 100 secure spaces. On-street bicycle parking is also available throughout the surrounding area.

In addition to on-street bicycle facilities, Bay Area Bike Share operates a regional public bicycle sharing system, allowing members to rent bicycles from secure docking stations. Two bike share stations are within 0.25 mile of the campus. One Bay Area Bicycle Share station close to the LRCP site is on the south side of Market Street, near the intersection of Seventh Street, Market Street, and McAllister Street, with 24 spaces. The other nearby station is on the east side of Polk Street north of Grove Street, with 19 spaces. Bay Area Bike Share is proposed to be expanded from 700 bicycles to 7,000 bicycles by 2017, with stations in San Francisco, San Jose, Oakland, Berkeley, and Emeryville. A bike share station in the Mission Bay/UCSF area will be installed by early 2017.

Loading

Commercial and passenger loading activities occur at each UC Hastings campus building. One on-street metered commercial loading space is available in front of 100 McAllister Street, and mid-block space is available between the 100 and 198 McAllister Street buildings. The 198 McAllister Street and 200 McAllister Street buildings each provide off-street commercial loading docks along McAllister Street. Passenger loading primarily occurs along McAllister Street, Hyde Street, and Golden Gate Avenue, at unmetered on-street passenger loading areas.

Source: Fehr & Peers, 2015

FIGURE 4.8-4: EXISTING BICYCLE ROUTES

Transportation Demand Management

Transportation Demand Management (TDM) refers to a set of strategies intended to reduce the demand for roadway travel. UC Hastings does not have a formal TDM program; however, the university includes several transportation practices that are consistent with TDM measures. These practices include unsubsidized employee and student parking, unbundled residential parking, employee commuter benefits, and an evening van service.

UCSF has an existing TDM program including, but not limited to, an extensive shuttle service among other alternative transportation opportunities, vanpools, and reserved carpool stalls at various campus sites, unsubsidized employee and student parking, access to City Carshare vehicles, an "emergency ride home" program, and employee commuter benefits. UCSF TDM measures would apply to UCSF households upon occupancy.

Emergency Services

Emergency vehicle access to the campus would occur along Golden Gate Avenue, Hyde Street, Larkin Street, and McAllister Street. The closest San Francisco Fire Department station to the campus is Station 3, approximately 0.5 mile northwest, at Post Street and Polk Street. The closest hospital is Saint Francis Memorial Hospital, approximately 0.75 mile north, at Hyde Street and Bush Street. Police services are provided on site by the UC Hastings Public Safety Department.

Parking

As previously noted, under SB 743, parking related impacts within a transit priority area are not considered significant under CEQA. Therefore, parking conditions are discussed for context and for informational purposes.

Both on and off-street parking is available in the UC Hastings area. Two public off-street parking garages are available in the immediate area. The UC Hastings parking garage, at 376 Larkin Street between Golden Gate Avenue and McAllister Street, contains 395 spaces and is open to UC Hastings patrons as well as public use (including UCSF students and faculty). The Civic Center Parking Garage, on McAllister Street between Larkin Street and Polk Street, contains 843 spaces. Table 4.8-5, UC Hastings Parking Garage Weekday Occupancy, shows the garage occupancy rates of available off-street parking at the UC Hastings parking garage during weekday operating hours.

Table 4.8-5: UC Hastings Parking Garage Weekday Occupancy

Time	User Type		Total Occupancy	Percent Occupied
	Permit Holders[1]	Hourly Rate Users		
6 a.m.	74	8	82	20%
9 a.m.	121	165	286	71%
12 p.m.	157	214	370	93%
3 p.m.	148	189	338	84%
6 p.m.	92	68	160	40%
9 p.m.	92	32	124	31%
12 a.m.	86	11	96	24%

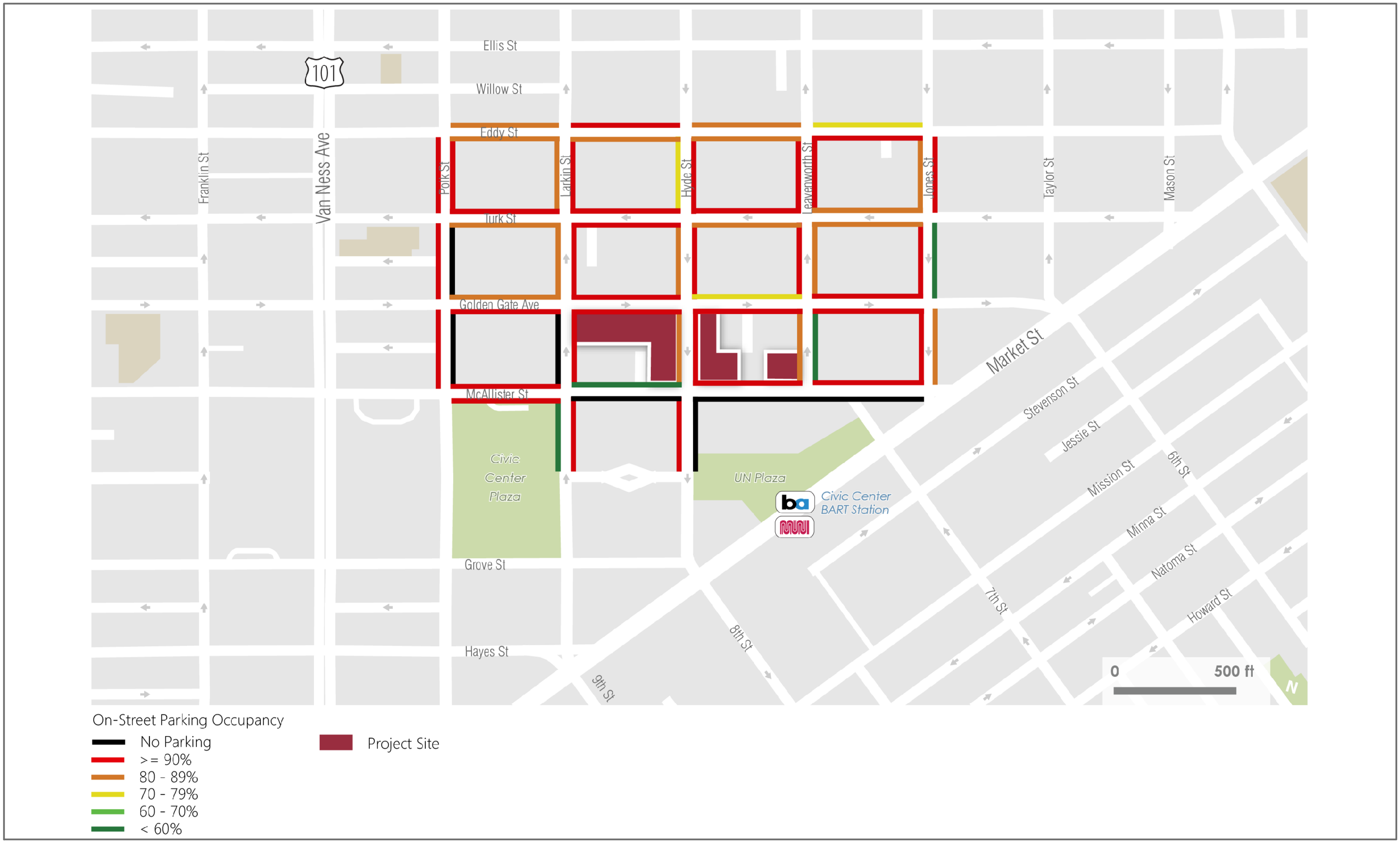
Notes:
1 Permit holders may include, but are not limited to, UC Hastings employees and students.
Source: UC Hastings, 2015

On-street metered parking is available along most streets in the LRCP area. A parking study assessed on-street parking conditions and occupancy rates for the weekday midday period (10:00 a.m. to 2:00 p.m.) in the LRCP area. The parking study area, which is bounded by Jones Street to the east, McAllister Street to the south, Polk Street to the west, and Eddy Street to the north, includes a total of 481 public on-street parking spaces. Figure 4.8-5, Midday Parking Occupancy, summarizes parking occupancy rates in the study area during the midday period. On-street parking is generally well utilized in the LRCP area.

San Francisco has implemented a parking management system for on-street and off-street spaces. The SFpark program, administered by SFMTA, uses new technologies and parking pricing policies to optimize the use of existing parking resources to make finding a parking space faster and easier and, by extension, reduce circling by vehicles looking for parking near their destination. Currently, SFpark manages 7,000 on-street metered parking spaces (25 percent of the city's supply) and 12,250 off-street parking spaces in city-owned garages or lots. Near UC Hastings, there are SFpark meters along all east-west streets between Hyde Street and Van Ness Avenue and all north-south streets between Eddy Street and Grove Street.

Travel Demand Analysis

Travel demand refers to the new vehicle, transit, bicycle, and pedestrian traffic that would be generated by the LRCP. This analysis provides a forecast of the daily and PM peak hour trips that would be generated by new uses associated with LRCP development. The new academic building at 333 Golden Gate Avenue, which would replace academic and administrative space at 198 McAllister Street, would not generate net new travel demand at UC Hastings. The residential uses proposed with the LRCP would generate new travel demand. Parking demand and delivery/service vehicle-trips for the new uses are also presented.



Source: Fehr & Peers, 2015

FIGURE 4.8-5: MIDDAY PARKING OCCUPANCY (10 AM - 2 PM)

Travel demand estimates were developed specifically for the LRCP based on results from employee and student travel surveys completed in November 2015, pedestrian volume counts at campus building entrances completed in September and October 2015, area travel information from the US Census American Community Survey, interviews with UC Hastings facilities managers, and information from the San Francisco Planning Department's transportation impact guidelines (SF Guidelines);[4] these data were used to develop the existing travel patterns for UC Hastings students and employees. The resulting trip generation and mode share rates were then applied to the projected net new number of employees and on- and off-campus students at UC Hastings to estimate future travel demand. Thus, the methodology assumes that the modal share would be appropriate to represent both existing and future travel conditions at the campus; that is, mode shifts between existing conditions and future conditions are not expected to change.

Trip Generation

Table 4.8-6, LRCP Trip Generation, presents the weekday daily and PM peak hour person-trip generation forecasts for the Variant A, Variant B, and 100 McAllister Street scenarios. As outlined in Chapter 3, Project Description, Section 3.1.1, the forecasts assume the upper end of the range of potential campus housing units for Variant A, Variant B, and 100 McAllister Street, and the projected ratio of UC Hastings and UCSF students and faculty at the new campus housing. The trip generation is inclusive of all campus affiliates, including commuting faculty, staff, and students, as well as resident faculty and students. The trip rates and daily to PM peak-hour ratios for UC Hastings commuters and residents from the existing conditions are applied to each LRCP scenario. As discussed previously, no net new trips would be generated by the 333 Golden Gate Avenue project.

Daily trip rates for UCSF students and faculty who would reside at UC Hastings reflect the student resident trip rates for the UCSF Parnassus and Mission Bay campuses, as reported in the UCSF Long Range Development Plan Environmental Impact Report.[5] The trip rate for UCSF students and faculty is four daily trips per person, and 13.5 percent of trips are assumed to occur during the PM peak hour.

[4] San Francisco Planning Department. 2002. *Transportation Impact Analysis Guidelines for Environmental Review*. October.

[5] UCSF. 2014. *Long Range Development Plan Final Environmental Impact Report*, State Clearinghouse Number 2013092047. November.

Table 4.8-6: LRCP Trip Generation

Affiliation		Person Trips		External Trips	
		Daily	PM Peak Hour	Daily	PM Peak Hour
Variant A					
100 McAllister Street Residents	280 UC Hastings Students	2,436	268	924	102
	1 UC Hastings Faculty	9	1	4	0
	93 UCSF Students	372	50	372	50
	6 UCSF Faculty	24	3	24	3
198 McAllister Street Residents[4]	73 UC Hastings Students	635	70	241	26
	5 UC Hastings Faculty	44	4	17	2
	489 UCSF Students	1,953	264	1953	264
	34 UCSF Faculty	136	18	136	18
Commuters	184 UC Hastings Faculty	1,306	123	791	75
	196 UC Hastings Staff	1,411	133	804	76
	581 UC Hastings Students	3,487	314	2,378	214
Total		11,812	1,248	7,643	830
Variant B					
100 McAllister Street Residents	280 UC Hastings Students	2,436	268	924	102
	1 UC Hastings Faculty	9	1	4	0
	93 UCSF Students	372	50	372	50
	6 UCSF Faculty	24	3	24	3
198 McAllister Street Residents	73 UC Hastings Students	635	70	241	26
	5 UC Hastings Faculty	44	4	16.5	2
	489 UCSF Students	1,953	264	1953	264
	34 UCSF Faculty	136	18	136	18
50 Hyde Street Residents[5]	21 UC Hastings Students	182	20	69	8
	1 UC Hastings Faculty	9	1	3	0
	138 UCSF Students	552	75	552	75
	10 UCSF Faculty	32	4	32	4
Commuters	183 UC Hastings Faculty	1,299	122	787	74
	200 UC Hastings Staff	1,440	136	820	77
	560 UC Hastings Students	3,367	303	2,296	207
Total		12,489	1,339	8,230	910

Affiliation		Person Trips		External Trips	
		Daily	PM Peak Hour	Daily	PM Peak Hour
100 McAllister Street					
100 McAllister Street Residents[1]	280 UC Hastings Students	2,436	268	924	102
	1 UC Hastings Faculty	9	1	4	0
	93 UCSF Students	372	50	372	50
	6 UCSF Faculty	24	3	24	3
Commuters	189 UC Hastings Faculty[2]	1,342	126	813	77
	178 UC Hastings Staff	1,282	121	730	69
	653 UC Hastings Students[3]	3,926	353	2,677	241
Total		9,390	922	5,544	542

Notes:
[1] 100 McAllister currently has 280 UC Hastings student residents. This number would be maintained, and it is assumed that all additional units would be allocated to UC Hastings faculty and UCSF students and faculty.
[2] The remaining number of UC Hastings faculty after subtracting faculty residents (seven total faculty)
[3] The remaining number of UC Hastings students after subtracting student residents (933 total students)
[4] The 600 residents at 198 McAllister are proportionally divided between UC Hastings students and faculty and UCSF students and faculty, based on the proportion of students and faculty not living in 100 McAllister (12 percent UC Hastings students, 1 percent UC Hastings faculty, 81 percent UCSF students, and 6 percent UCSF faculty).
[5] The 170 residents at 50 Hyde are proportionally divided between UC Hastings and UCSF students based on the remaining students and faculty not living in 100 McAllister.
Source: Fehr & Peers, 2016

Variant A would generate 11,812 daily person-trips and 1,248 PM peak-hour trips, increases of 2,841 (32 percent) and 394 (46 percent) daily and peak-hour person-trips, respectively. Variant B would generate 12,489 daily person trips and 1,339 PM peak-hour person-trips. The 100 McAllister Street scenario would generate 9,390 total daily person-trips on a typical weekday and 922 person-trips during the weekday PM peak hour. This would be an increase in 419 daily trips (5 percent) and 68 peak-hour trips (8 percent) from the existing makeup of employees and students. These increases result in 3,519 additional daily person trips (39 percent) and 485 additional peak-hour person-trips (57 percent). Table 4.8-7, Net New Person-Trips by Scenario, shows the net new trips.

Table 4.8-7: Net New Person-Trips by Scenario

Affiliation	Person Trips		External Trips	
	Daily	PM Peak Hour	Daily	PM Peak Hour
Variant A	2,842	381	2,507	301
Variant B	3,518	472	3,094	381
100 McAllister Street	419	55	408	13

Source: Fehr & Peers 2016

Trip Distribution

The geographic distribution of the project-generated trips was obtained from student and employee travel surveys, US Census data, information from UCSF Planning staff, and the UCSF LRDP EIR. The distribution is based on the origin/destination of the trip, and are separated into the four quadrants of San Francisco (Superdistricts 1 through 4), East Bay, North Bay, South Bay, and outside the region. The UC Hastings campus is in Superdistrict 1. As shown in Table 4.8-8, Trip Distribution, the majority of the LRCP-generated trips would be within San Francisco. These patterns were used as the basis for assigning project-generated vehicle trips to the local streets in the study area and transit trips to individual transit lines.

Table 4.8-8: Trip Distribution

Place of Trip Ends	Commuters			Residents	
	Faculty[1]	Staff[1]	UCH[2]	UCH[3]	UCSF[3]
San Francisco	39%	44%	58%	95%	95%
Superdistrict 1 (Northeast Quadrant)	9%	7%	20%	70%	35%
Superdistrict 2 (Northwest Quadrant)	15%	16%	18%	10%	10%
Superdistrict 3 (Southeast Quadrant)	12%	16%	12%	10%	45%
Superdistrict 4 (Southwest Quadrant)	3%	5%	8%	5%	5%
East Bay	35%	35%	25%	2%	2%
North Bay	12%	4%	6%	1%	1%
South Bay	15%	16%	11%	2%	2%
Other	0%	0%	0%	0%	0%
Total	100%	100%	100%	100%	100%

Notes:
[1] Based on UC Hastings Employee Travel Survey results
[2] Based on UC Hastings Student Travel Survey results
[3] Based on adapted values from the American Community Survey (2010-2014) and the UCSF LRDP EIR

Mode Split

Table 4.8-9, LRCP PM Peak-Hour External Trips by Mode, summarizes the weekday PM peak-hour external trip generation by mode for the LRCP, less the 333 Golden Gate Avenue scenario, which would have the same PM peak-hour external trip generation as the existing conditions. Under the 100 McAllister Street scenario, weekday PM peak-hour external trips would be approximately 16 percent by automobile, 45 percent by transit, 31 percent by walking, 2 percent by bicycling, and 4 percent by shuttle. Auto trips are inclusive of single driver, carpool, motorcycle, and drop-off trips (including taxis and transportation network companies).

Under Variant A, approximately 12 percent of all external person-trips would be by automobile, 38 percent by transit, 31 percent by walking, 3 percent by bicycling, and 18 percent by the UCSF shuttle. Variant A would generate 106 vehicle trips during the weekday PM peak hour, an increase of 32 vehicle trips from the existing conditions.

Under Variant B, approximately 12 percent of all external person-trips would be by automobile, 37 percent by transit, 27 percent by walking, 3 percent by bicycling, and 20 percent by the UCSF shuttle. Variant B would generate 113 vehicle trips during the weekday PM peak hour, an increase of 39 vehicle trips from the existing conditions.

With the renovation of 100 McAllister Street, approximately 18 percent of all external person-trips would be by automobile, 45 percent by transit, 31 percent by walking, 2 percent by bicycling, and 4 percent by the UCSF shuttle. The 100 McAllister Street scenario would generate 80 vehicle-trips during the weekday PM peak hour, which would be an increase of six trips from the existing conditions.

With the Variant A and B scenarios, and renovation of 100 McAllister Street, UCSF would provide up to five express shuttles during the AM (7 a.m. to 10 a.m.) and PM (3 p.m. to 7 p.m.) peak periods, in addition to the existing routes. These express shuttles would accommodate the additional travel demand generated by the UCSF residents at 198 McAllister Street, and 50 Hyde Street, and 100 McAllister Street. The shuttle trips would total up to a maximum of 175 trips during the PM peak hour with Variant B. The new express shuttle would have 20- to 25-minute headways during both the AM and PM peak periods, and would travel primarily between the UCSF Parnassus campus and UC Hastings. The UCSF shuttle trips are included in the vehicle trip totals.

Table 4.8-9: LRCP PM Peak-Hour External Trips by Mode

Scenario	Person Trips						Vehicle Trips
	Auto	Transit	Walk	Bicycle	Shuttle	Total	
Variant A	107 12%	301 38%	214 27%	20 3%	141 18%	784 99%	114
Variant B	114 12%	324 37%	232 27%	23 3%	175 20%	867 99%	124
100 McAllister Street	84 18%	223 45%	149 31%	12 2%	22 4%	491 99%	82
Source: Fehr & Peers, 2016							

In summary, Variant A would generate 114 peak-hour vehicle trips, a net increase of 40 trips (an increase of 28 inbound trips and an increase of 12 outbound peak-hour vehicle trips). Variant B would generate 124 trips, a net increase of 50 trips (an increase of 35 inbound trips and 15 outbound trips). The 100 McAllister Street renovation would generate an estimated 82 PM peak-hour vehicle trips, a net increase of eight trips (an increase of five trips inbound and three trips outbound). Table 4.8-10, Net New Peak-Hour Trips by Mode, summarizes the net new trips by mode.

Table 4.8-10: Net New Peak-Hour Trips by Mode

Scenario	Person Trips					Vehicle Trips
	Auto	Transit	Walk	Bicycle	Shuttle	
Variant A	28	95	73	10	141	40
Variant B	35	118	92	12	175	50
100 McAllister Street	5	17	8	2	22	8
Source: Fehr & Peers, 2016						

Trip Assignment

It is expected that Variant A, Variant B, and 100 McAllister Street vehicle trips would marginally increase PM peak-hour volumes on nearby study intersections, as shown in Table 4.8-11, PM Peak-Hour Trip Assignment by Intersection.

Table 4.8-11: PM Peak-Hour Trip Assignment by Intersection

Intersection	Variant A	Variant B	100 McAllister Street
1. Van Ness & McAllister	10	13	2
2. Van Ness & Golden Gate	10	13	2
3. Turk & Larkin	2	2	0
4. Golden Gate & Larkin	8	10	2
5. McAllister & Larkin	28	35	5
6. Hyde & Golden Gate	10	13	3
7. Hyde & McAllister	17	21	3
8. Market & 7th	13	16	2
9. Market & 8th	8	10	2
10. Market & 9th	9	11	2
Source: Fehr & Peers, 2016			

Three intersections closest to UC Hastings would have the greatest increase in vehicle traffic, including Golden Gate Avenue and Larkin Street (Intersection 4), McAllister Street and Larkin Street (Intersection 5), and Hyde Street and McAllister Street (Intersection 7). For the purposes of trip assignment, all new trips to and from the campus would be expected to enter and exit the UC Hastings Garage via Larkin Street. This is a conservative assumption, as some new vehicle trips may park in the Civic Center garage or on-street within or outside of the study area.

Loading Demand

Loading demand with LRCP development would be expected to roughly match existing demand. For the 333 Golden Gate Avenue building, loading demand would be expected to be approximately the same as the existing demand at 198 McAllister Street, whose uses it would replace.

Per the factors in the SF Guidelines, Variants A and B would result in new commercial loading demand of approximately seven to 10 trips per day associated with the new campus housing. During the PM peak hour, average loading demand would be less than one space. For all scenarios, it is assumed that recycling/garbage collection would continue to occur at the same time as the existing collection, and thus, would not generate new trips.

For the 100 McAllister Street scenario, while additional housing units could result in an increased volume of deliveries, this increase would likely be accommodated within existing loading zones serving the site.

Passenger loading demand for the 333 Golden Gate Avenue and 100 McAllister Street scenarios would be expected to approximately match existing demand. The relocation of academic uses from 198 McAllister Street to the new 333 Golden Gate Avenue building could cause a shift in some passenger loading activity to Golden Gate Avenue, although it would not constitute an increase in net demand. For the 100 McAllister Street scenario, while additional housing units could result in an increase in passenger loading activity, this increase in activity would likely be marginal. Passenger loading would be accommodated with a 40- to 50-foot curb loading zone on Golden Gate Avenue and a similar zone on McAllister Street. UC Hastings would work with SFMTA to establish appropriate curb designations for loading zones. The two loading zones could reduce curb parking by up to four spaces.

Variant A and Variant B would increase passenger loading demand associated with new housing. Notably, passenger loading activity would increase as a result of the introduction of UCSF shuttle service at the UC Hastings campus, which is not currently served by the shuttle. The UCSF shuttle would include two dedicated stops—one for the Blue route and one for the Gold route. Each route is currently served by three shuttles per hour between approximately 6:00 a.m. and 9:00 p.m. The shuttle would be open to students, faculty, staff, and affiliates of both UCSF and UC Hastings.

Parking Demand

Parking demand with the LRCP is a function of the proportion of employees, students, and residents requiring parking (e.g., driving a personal vehicle, rather than being dropped off or picked up by a taxi) and the daily absentee rate of each population group. These rates were derived from the UC Hastings employee and student survey cited previously; the "Parking Required" rate for students residing on campus is based on their personal vehicle ownership, while commuter rates are based on the mode share for each population group. Table 4.8-12, Parking Demand, summarizes the parking demand derived from the employee and student surveys. Existing parking demand is about 140 midday spaces and 79 evening spaces. The 333 Golden Gate Avenue building would generate the same amount of parking demand as the existing condition. Variant A would generate demand for 251 parking spaces midday and 191 spaces in the evening. Variant B would generate demand for 271 parking spaces midday and 218 spaces in the evening. The 100 McAllister Street scenario would generate demand for 180 parking spaces midday and for 95 evening spaces.

Table 4.8-12: Parking Demand

Affiliation	Requiring Parking	Absentee Rate	Existing		Variant A		Variant B		100 McAllister Street	
			Midday	Evening	Midday	Evening	Midday	Evening	Midday	Evening
Campus Residents										
On-Campus UCH	16%	0%	36	46	47	58	49	62	37	46
On-Campus UCSF	16%	0%	0	0	81	101	100	125	13	16
Commuters										
Faculty	31%	26%	43	12	42	11	42	11	43	12
Staff	12%	5%	19	4	21	5	22	5	19	4
Off-Campus UCH	12%	10%	42	17	60	15	58	14	68	17
Total Spaces			**140**	**79**	**251**	**191**	**271**	**218**	**180**	**95**
Source: Fehr & Peers, 2016										

Table 4.8-13, Net New Parking Demand, shows the net new parking spaces demanded by UC Hastings affiliates. The 100 McAllister Street, Variant A, and Variant B scenarios represent an increase in parking demand. The 100 McAllister Street scenario would increase demand by 28 percent and 20 percent during the midday and evening periods, respectively. Variant A would

generate demand for more parking—a 76 percent increase for midday spaces and a 242 percent increase for evening spaces. Variant B would generate the largest net new parking demand, with an increase of 94 percent and 275 percent for midday and evening parking, respectively. These increases in demand are attributable to more student residents who own vehicles, as it is assumed that midday residential parking demand is 80 percent of evening residential parking demand.

Table 4.8-13: Net New Parking Demand

Scenario	Midday	Evening
Variant A	111	112
Variant B	131	139
100 McAllister Street	40	16
Source: Fehr & Peers, 2016		

Construction Effects

Development under the LRCP would occur using a coordinated, phased construction schedule that would maintain UC Hastings operations during the construction periods. This section describes the estimated construction truck demand per work day. The type of truck will vary per the construction project, but could include a combination of hauler, excavation, materials delivery, cement, and/or smaller, more specialized trucks for specific functions.

The estimated range of average truck trips per workday would vary for each project scenario. Construction of 333 Golden Gate Avenue could require between five and 15 truck trips per workday at peak activity. With Variant A, 198 McAllister Street could require between 10 and 30 truck trips at peak activity. The renovation of 50 Hyde Street could require between five and 15 truck trips at peak activity. Renovation of 100 McAllister Street could require up to 10 truck trips at peak activity.

As the new 333 Golden Gate Avenue building would be completed and occupied before construction at 198 McAllister Street would proceed, Variant A could require an additional 10 to 30 truck trips per workday at peak activity. Construction work at 50 Hyde Street could proceed at the same time as 198 McAllister Street, and Variant B could require up to 15 to 45 truck trips per workday at peak activity.

4.8.2 Impacts and Mitigation

Significance Criteria

The LRCP development projects would have a significant impact relative to transportation if the criteria below, organized by transportation mode or topic, were exceeded.

Traffic

As noted previously, under SB 743 and Public Resources Code Section 21099, and when the OPR adopts alternative metrics for determining significant traffic effects under CEQA, intersection LOS will no longer be considered a significance criterion for traffic impacts. However, this section discusses LOS for informational purposes to disclose potential LRCP effects related to traffic conditions.

Transit

Development under the LRCP would have a significant effect if demand for public transit causes the need for development or expansion of mass transit facilities, the development of which would cause significant environmental impacts.

Parking

Per SB 743, Public Resources Code Section 21099(d), effective January 1, 2014, provides that "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." LRCP development would meet each of the three criteria, and therefore, this analysis presents a parking demand, supply, and requirements analysis for informational purposes.

Bicycles and Pedestrians

Development under the LRCP would have a significant effect on the environment if it would conflict with adopted bicycle and pedestrian plans or policies or cause a substantial conflict among automobiles, bicyclists, pedestrians, and transit vehicles.

Loading

LRCP development would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, or if it created potentially hazardous conditions or significant delays affecting traffic, transit, bicycles, or pedestrians.

Emergency Vehicle Access

LRCP development would have a significant effect on the environment if it would result in inadequate emergency vehicle access or pose conflicts for emergency vehicles.

Impacts

Impact TR-1 The proposed LRCP would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. *Less-than-Significant Impact*

Development of the new academic building at 333 Golden Gate Avenue would move existing academic space to a new location on campus, but would otherwise generate the same amount of vehicle trips to the campus as the existing condition. Therefore, potential LRCP development at 333 Golden Gate Avenue would have a less-than-significant impact on traffic, transit, pedestrian, and bicycle conditions. Therefore, the 333 Golden Gate Avenue building is not discussed further under these topics.

Traffic

Implementation of the LRCP would have less-than-significant impacts at all study intersections under Existing plus Project Conditions. As shown in Table 4.8-14, Existing plus LRCP Intersection Delay and LOS, LRCP development would not materially change existing delay or LOS at any study intersections, and would not cause the deterioration of operation at any study intersections.

Variant A – New Campus Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

LRCP development with Variant A would result in minor changes in existing PM peak hour vehicle trips generated at the UC Hastings campus. Variant A would generate a net increase of 32 trips (an increase of 24 inbound trips and an increase of eight outbound trips). However, as shown in Table 4.8-14, the minor increase in trips would not cause LOS deterioration at any of the study intersections. All new trips would be assumed to enter and exit the UC Hastings Parking Garage via Larkin Street; however, it is possible that some spillover activity could occur at the Civic Center Parking Garage. Variant A would have a less-than-significant impact on traffic conditions.

Variant B – New Campus Housing Development at 198 McAllister Street and 50 Hyde Street

LRCP development with Variant B would also result in minor changes to existing PM peak-hour vehicle trips generated at the UC Hastings campus. Variant B would generate a net increase of 40 trips (an increase of 30 inbound trips and 10 outbound trips). However, as shown in Table 4.8-14, LOS at study intersections would not deteriorate beyond current conditions.

Similar to Variant A, all new trips are assumed to enter and exit the UC Hastings Parking Garage via Larkin Street; however, it is possible that some spillover activity could occur at the Civic Center Parking Garage. Variant B would have a less-than-significant on impact traffic conditions.

100 McAllister Street Renovation

Renovation at 100 McAllister Street would result in minor changes to existing PM peak-hour vehicle trips generated at the UC Hastings campus. Renovation of 100 McAllister Street would generate a net increase of six trips (an increase of four inbound trips and an increase of two outbound trips). However, as shown in Table 4.8-14, the minor increase in trips would not cause LOS deterioration at any of the study intersections. All new trips would be assumed to enter and exit the UC Hastings Garage via Larkin Street; however, it is possible that some spillover activity could occur at the Civic Center garage. Renovation of 100 McAllister Street would have a less-than-significant impact on traffic conditions.

Table 4.8-14: Existing plus LRCP Intersection Delay and LOS

Intersection	Existing		Existing + Variant A[1]		Existing + Variant B[2]		Existing + 100 McAllister Street[3]	
	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS	Average Delay	LOS
1. Van Ness & McAllister	20	B	20	B	20	B	20	B
2. Van Ness & Golden Gate	22	C	22	C	22	C	22	C
3. Turk & Larkin	18	B	18	B	18	B	18	B
4. Golden Gate & Larkin	13	B	13	B	13	B	13	B
5. McAllister & Larkin	9	A	9	A	9	A	9	A
6. Hyde & Golden Gate	13	B	13	B	13	B	13	B
7. Hyde & McAllister	15	B	15	B	15	B	15	B
8. Market & Seventh	20	C	20	B	20	B	19	C
9. Market & Eighth	49	D	51	D	51	D	49	D
10. Market & Ninth	23	C	23	C	23	C	23	C

Notes:
1 Existing + Variant A scenario includes renovation at 100 McAllister Street.
2 Existing + Variant B scenario includes renovation at 100 McAllister Street.
3 Existing + 100 McAllister Street Only scenario.
Source: Fehr & Peers, 2016

As noted, SB 743, implemented in Public Resources Code Section 21099, will change CEQA transportation impact analysis. Those changes will include elimination of auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts. The proposed changes in the CEQA Guidelines to implement SB 743, which are under review by the OPR as of January 2016, present Vehicle Miles Traveled (VMT) as an appropriate measure of transportation impacts. That criterion presumes that projects near a transit corridor would have limited VMT increases and less-than-significant transportation impacts. UC Hastings has not adopted VMT as a transportation impact criterion. VMT changes are discussed in the following paragraphs for informational purposes.

VMT was calculated using the CalEEMod air quality impact model. This model includes default VMT factors for different land uses that do not specifically account for projects in transit priority areas. Therefore, the VMT presented in Table 4.8-15, Existing plus LRCP Annual and Daily VMT Calculation, is conservatively high, and actual LRCP-related VMT would be lower than in the table. Implementation of the LRCP would increase VMT by 15 percent for Variant A and 28 percent for Variant B, which would be consistent with the increase in vehicle trips generated by each scenario.

Table 4.8-15: Existing plus LRCP Annual and Daily VMT Calculation

Scenario	Existing	Existing + Variant A	Existing + Variant B
Annual	1,630,000	1,882,700	2,084,700
Daily	4,470	5,160	5,710
Source: Fehr & Peers, 2016			

Development under the LRCP would have less-than-significant impacts on traffic conditions. Nonetheless, while UC Hastings does not have a formal Transportation Demand Management (TDM) Program, it supports ways to minimize the number of single occupancy vehicle (SOV) trips generated by the LRCP by encouraging people to select other modes of transportation, including walking, bicycling, transit, carshare, UCSF shuttle use, carpooling, and other modes.

Transit

Implementation of the LRCP would have less-than-significant impacts on all transit services under existing plus LRCP development conditions. As shown in Table 4.8-16, LRCP-Generated PM Peak-Hour Transit Trips, Variants A and B and 100 McAllister Street would increase transit trips by approximately 95, 118, and 17 trips, respectively. These new transit trips would be distributed across several local and regional routes (such as BART, Golden Gate Transit, Muni Metro, and Muni bus routes along Market Street, Geary Street, Van Ness Avenue, and other corridors), and would be a relatively small number compared to available passenger throughput. Nearly all new transit trips associated with Variants A and B and 100 McAllister

Street would be generated by the UCSF students living in 198 McAllister or 50 Hyde. As these residents would travel primarily between their UC Hastings residences and classes at UCSF campuses during the PM peak hour, travel would occur in the opposite direction of the local and regional transit peak. As a result, no increase in transit trips across any screenlines would be expected with any of the LRCP scenarios, and therefore, no scenarios would create the need for the development or expansion of transit facilities. Thus, the Variant A, Variant B, and 100 McAllister Street scenarios would result in less-than-significant impacts related to transit conditions.

Table 4.8-16: LRCP-Generated PM Peak-Hour Transit Trips

Affiliation	Variant A	Variant B	100 McAllister Street
Faculty	-1	-2	0
Staff	6	8	1
On-Campus UCH	1	2	0
Off-Campus UCH	-12	-15	0
On-Campus UCSF	101	125	16
Total	95	118	17
Source: Fehr & Peers 2016			

Parking

As noted previously, under SB 743, provides parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment; therefore, this analysis presents a parking demand, supply, and requirements analysis for informational purposes.

The 333 Golden Gate Avenue building would generate the same amount of parking demand as the existing condition. The Variant A and Variant B scenarios, and renovation at 100 McAllister Street would result in additional parking demand at the UC Hastings campus that may exceed available parking supply at the UC Hastings Parking Garage. Unmet parking demand may be accommodated at off-site locations such as the Civic Center Parking Garage (which, as noted in Section 4.8.1, has available capacity). The availability and cost of parking in the vicinity of the UC Hastings campus could also cause drivers to convert to alternative modes.

Project-generated parking demand that would not be met by the project would not be considered a significant impact under CEQA.

Bicycle

Implementation of the LRCP would have less-than-significant impacts on bicycle conditions under Existing plus Project Conditions. Variant A and Variant B would result in seven to 10 new bicycle trips to and from the campus. These changes in bicycle activity are small and would be distributed across several streets, including McAllister Street, Larkin Street, Golden Gate Avenue, and Hyde Street. Bicycle parking demand associated with UC Hastings trips would be adequately accommodated within the combined 100 secure spaces at 200 McAllister Street and the UC Hastings Parking Garage. Additional bicycle parking demand associated with UCSF student residents would not be accommodated within existing campus parking; additional bicycle parking would be accommodated within the design of 198 McAllister (Variant A) or 50 Hyde (Variant B). Nonetheless, Variant A and Variant B would not change the existing condition such that there would be substantial conflicts between modes. Therefore, Variant A and Variant B would result in less-than-significant impacts on bicycle conditions.

Renovation at 100 McAllister Street would generate roughly the same amount of bicycle trips as the existing condition. Bicyclists would continue to access the UC Hastings campus via McAllister Street, Larkin Street, Golden Gate Avenue, and Hyde Street. Bicycle parking demand would be adequately accommodated within the combined 100 secure spaces at 200 McAllister Street and the UC Hastings Parking Garage. LRCP development at 100 McAllister Street would result in less-than-significant impacts on bicycle conditions.

Pedestrian

Implementation of the LRCP would have less-than-significant impacts related to pedestrian conditions under existing plus LRCP conditions. The Variant A, Variant B, and 100 McAllister Street development scenarios would result in minor changes to pedestrian circulation around the campus. Variant A and Variant B would increase pedestrian trips by 71 and 89 trips, respectively, associated with new housing at 198 McAllister Street and 50 Hyde Street. The 100 McAllister Street scenario would result in six new pedestrian trips associated with additional housing at that location.

All scenarios would shift pedestrian circulation patterns for UC Hastings students as on-campus circulation between classes would be wholly contained in adjacent buildings at 200 McAllister Street and 333 Golden Gate Avenue, which might ultimately reduce the number of pedestrian trips across the intersection of Hyde Street and McAllister Street. Overall, those changes in pedestrian activity would be minor in the context of the local pedestrian conditions, and would not result in substantial conflicts. Therefore, development with the LRCP would result in less-than-significant impacts on pedestrian conditions.

Loading

Commercial

Implementation of the LRCP would have less-than-significant impacts on commercial loading activities under existing plus LRCP conditions. The 333 Golden Gate Avenue scenario would generate the same amount of commercial loading as the existing condition. The Variant A and Variant B scenarios would result in a minor net increase in deliveries associated with new residences; however, that demand would not be expected to substantially change existing loading activity. Variant A and Variant B would increase loading demand; however, during the PM peak hour, average loading demand would be less than one space and loading demand for all scenarios could be accommodated within the existing loading dock at 200 McAllister Street. Renovation of 100 McAllister Street would generate a similar amount of loading demand as currently occurs at the site. Therefore, LRCP development would result in less-than-significant impacts on commercial loading conditions.

Passenger

Implementation of the LRCP would have less-than-significant impacts on passenger loading conditions under existing plus LRCP conditions. With 333 Golden Gate Avenue development, some passenger loading demand may shift to that location, which does not currently have passenger loading spaces. These minor changes in demand would be accommodated by potential new passenger loading zones in those locations. Therefore, the 333 Golden Gate Avenue scenario would result in a less-than-significant impact on passenger loading conditions.

Variant A, Variant B, and 100 McAllister Street would result in increased passenger loading demand associated with new housing. Passenger loading activity would be accommodated within the existing curb loading areas. UC Hastings would provide passenger loading areas to accommodate both the existing UC Hastings and UCSF shuttles, and up to an additional five UCSF shuttle runs serving UC Hastings. Variant A, Variant B, and 100 McAllister Street would not result in significant delays or hazardous conditions associated with passenger loading demand, and would result in less-than-significant impacts on passenger loading conditions.

Emergency Access

Implementation of the LRCP would have less-than-significant impacts on emergency vehicle access under existing plus LRCP conditions. Development with the LRCP would not substantially change existing emergency vehicle access. All new UC Hastings buildings would maintain circulation around adjacent streets. Therefore, development with the LRCP would result in less-than-significant impacts related to emergency conditions.

Construction

Construction activity at UC Hastings would result in temporary disruptions to nearby streets, transit services, and pedestrian and bicycle facilities, and the generation of new truck trips. LRCP construction would occur in the following phases:

- Construction at 333 Golden Gate Avenue is projected to be completed by 2020, and may require between five and 15 truck trips per day at peak activity. Construction activities may temporarily disrupt vehicle, bicycle, and pedestrian circulation along Golden Gate Avenue adjacent to the site, and may displace some on-street parking.

- Demolition and construction at 198 McAllister Street would occur after 2020 occupancy of 333 Golden Gate Avenue, and may require between 10 and 30 truck trips per day at peak activity. Construction activities may temporarily disrupt vehicle, transit (5 Fulton, 5R Fulton Rapid), bicycle, and pedestrian circulation along McAllister Street adjacent to the site.

- Demolition and construction at 50 Hyde Street would occur after 2020 occupancy of 333 Golden Gate Avenue, and may require between five and 15 truck trips per day at peak activity. Construction activities may temporarily disrupt vehicle, transit (19 Polk), bicycle, and pedestrian circulation along Hyde Street adjacent to the site, and may displace some on-street parking.

- Renovation at 100 McAllister Street would commence upon the completion of 198 McAllister Street. Construction is anticipated to begin between 2022 and 2025, depending upon the schedule of other LRCP projects, and would result in up to 10 truck trips per day at peak activity. Construction activities may temporarily disrupt vehicle, transit (5 Fulton, 5R Fulton Rapid), bicycle, and pedestrian circulation along McAllister Street adjacent to the site, and may displace some on-street parking.

The type of trucks would vary, but could include a combination of hauler, excavation, materials delivery, cement, and smaller, more specialized trucks for specific functions.

Prior to project construction, UC Hastings and their construction contractor(s) would meet with the San Francisco Department of Public Works (DPW) and SFMTA staff to develop and review truck routing plans for demolition, disposal of excavated materials, materials delivery and storage, as well as staging for construction vehicles. For any work in the public right-of-way, the construction contractor would be required to comply with the SFMTA Blue Book,[6] including regulations regarding sidewalk and lane closures, and would meet with SFMTA staff to determine if any special traffic permits would be required. Prior to construction, the project

[6] SFMTA. 2012. Regulations for Working in San Francisco Streets, 8th Edition. January. Online: https://www.sfmta.com/services/streets-sidewalks/construction-regulations. Accessed on March 9, 2016.

contractor(s) would coordinate with Muni's Street Operations and Special Events Office to coordinate construction activities and reduce any impacts on transit operations.

The addition of the worker-related vehicle or transit trips would not substantially affect transportation conditions, as impacts on local intersections or the transit network would be temporary in nature. Construction workers who drive to the construction sites would cause a temporary increase in parking demand, and potential temporary parking restrictions along frontages where construction and/or staging are occurring would cause a temporary decrease in parking supply. Construction workers would park at the UC Hastings Parking Garage or at off-campus garages such as the Civic Center Parking Garage.

Overall, because construction activities would be phased, temporary, and limited in duration, and because they would comply with city requirements, construction-related transportation impacts related to LRCP development at 333 Golden Gate Avenue, 198 McAllister Street, 50 Hyde Street, and 100 McAllister Street would be less than significant.

4.8.3 Cumulative Impacts

Cumulative Analysis Approach

Cumulative conditions include transportation demand resulting from reasonably foreseeable land use changes, and conditions associated with reasonably foreseeable transportation projects.

Traffic and Transit Demand

Future 2040 cumulative traffic and transit demand projections were estimated based on cumulative development and growth identified by the San Francisco County Transportation Authority travel demand model (SF-CHAMP).

- Traffic: Future 2040 Cumulative traffic volumes were estimated based on cumulative development and growth identified by SF-CHAMP, using model output that represents existing conditions and model output for 2040 Cumulative conditions. The 2040 Cumulative traffic volumes take into account cumulative development projects in the project vicinity. Because the LRCP scenarios are not accounted for in the growth projections included in the SF-CHAMP cumulative model, the traffic generated by the LRCP scenarios was overlaid on the cumulative traffic volumes as part of a manual process. Figure 4.8-6 shows the PM peak-hour cumulative plus LRCP vehicle volumes.

- Transit: The 2040 Cumulative transit screenline analysis accounts for ridership and/or capacity changes associated with Muni Forward, the Van Ness and Geary Bus Rapid Transit (BRT) projects, the Central Subway Project (which is scheduled to open in 2019), the new Transbay Transit Center, the electrification of Caltrain, and expanded Water Emergency Transportation Authority ferry service. Because the LRCP scenarios are not accounted for in the growth projections included in the SF-CHAMP cumulative model, the transit ridership generated by the LRCP scenarios was overlaid on the cumulative transit ridership as part of a manual process.

Transportation Projects

Van Ness Bus Rapid Transit Project

The San Francisco County Transportation Authority (SFCTA) and the SFMTA Board of Directors approved a Locally Preferred Alternative for the Van Ness BRT project in May and June of 2012. The Locally Preferred Alternative includes dedicated center-running bus lanes separated from traffic from Mission to Lombard Streets, which will be used by Muni Routes 49 Van Ness/Mission and 47 Van Ness, and by Golden Gate Transit. This configuration, along with elimination of most left turns, transit signal priority, and traffic signal optimization, will help reduce travel time on the corridor by as much as 33 percent; new pedestrian and streetscape improvements will also be implemented throughout the corridor. The Federal Transit Administration issued a Record of Decision in December 2013, determining that environmental review requirements have been met. In November 2014, the SFMTA completed 65 percent design for this project and the SFMTA Board legislated the traffic, transit, and parking changes necessary for the project. Van Ness BRT construction is expected to begin in 2016, with BRT service beginning on the Van Ness Avenue corridor in 2018.

Geary Bus Rapid Transit Project

The SFCTA is currently leading the environmental review phase for the Geary BRT project, and is working to address comments from the Federal Transit Administration on the administrative draft Environmental Impact Statement completed at the end of 2014. The Geary BRT project includes a package of transit and pedestrian improvements along the 6.5-mile-long Geary Street corridor between the Transbay Transit Center and 48th Avenue, including dedicated bus lanes, high-quality transit stations, and numerous pedestrian safety improvements. This project will follow the current route of Muni Routes 38 Geary and 38R Geary Rapid. The SFCTA anticipates project environmental approvals in spring 2016, with the implementation of some of the initial construction phase improvements during 2016, and engineering design of the full project beginning at the end of 2016. Geary BRT construction is anticipated to occur between 2018 and 2020.

Muni Forward Program

As indicated in Section 4.8.1, the Muni Forward Program anticipates changes to routes in the vicinity of the LRCP. The year 2040 Cumulative analysis assumes changes to the capacity of the lines, as identified by route changes and headway changes indicated within the recommended Muni Forward Program (as described in Section 4.8.1).

Impact TR-2 Implementation of the LRCP would have considerable contribution to significant cumulative transportation conditions for traffic, transit, bicyclists, pedestrians, loading, emergency access, and construction. ***Less-than-Significant Impact***

Traffic

The Variant A, Variant B, and 100 McAllister Street scenarios would result in minor changes to PM peak-hour vehicle trips generated at the UC Hastings Campus. Variant A would generate a net increase of 40 trips (an increase of 28 inbound trips and an increase of 12 outbound trips) during the PM peak hour. Variant B would generate a net increase of 50 trips (an increase of 35 inbound trips and 15 outbound trips) during the PM peak hour. The 100 McAllister Street scenario would generate a net increase of eight trips (an increase of four inbound trips and two outbound trips) during the PM peak hour. Table 4.8-17, Intersection Levels of Service – Cumulative Conditions, PM Peak Hour, summarizes the delay and LOS in the Existing and Cumulative plus Variant B scenario, which would result in the greatest amount of net new vehicle trips of the LRCP scenarios, and thus, the highest delay and corresponding intersection LOS. This is a conservative analysis of potential cumulative effects.

Table 4.8-17: Intersection Levels of Service – Cumulative Conditions, PM Peak Hour

Intersection	Existing		Cumulative plus Variant B	
	Average Delay	LOS	Average Delay	LOS
1. Van Ness & McAllister	20	B	30	C
2. Van Ness & Golden Gate	22	C	43	D
3. Turk & Larkin	18	B	20	C
4. Golden Gate & Larkin	13	B	14	B
5. McAllister & Larkin	< 10	A	8	A
6. Hyde & Golden Gate	13	B	14	B
7. Hyde & McAllister	15	B	17	B
8. Market & Seventh	20	C	49	D
9. Market & Eighth	49	D	>80	F
10. Market & Ninth	23	C	40	D
Source: Fehr & Peers, 2016				

In the cumulative plus LRCP scenarios, nine of the 10 intersections would operate at acceptable LOS. The intersection of Market Street and Eighth Street would operate at LOS F, with an average delay greater than 80 seconds during the PM peak hour in the cumulative plus LRCP scenarios. At this intersection, the critical southbound-through movement operates at LOS F. Variant B would contribute 10 trips to this movement, which would be less than 5 percent of the critical movement volume. This would not be a considerable contribution to the LOS F condition at that intersection.

Development under the LRCP would not cause the deterioration of any intersection operations, or increase traffic volumes by 5 percent or more at critical movements at the Market Street and Eighth Street intersection that would operate at LOS F under cumulative conditions. Because the contribution of project trips would not substantially affect cumulative intersection operations or contribute considerably to poorly operating critical movements, the LRCP developments would result in a less-than-significant impact on cumulative traffic conditions.

Transit

As shown in Table 4.8-18, Muni Screenline Capacity Utilization – Cumulative Conditions, PM Peak, for 2040 Cumulative plus Variant B conditions, the capacity utilization of the Northeast and Southwest screenlines and corridors within the screenlines would be less than Muni's 85 percent capacity standard during the PM peak hour. However, capacity utilization on the California, Sutter/Clement, and Fulton/Hayes corridors in the Northwest screenline (as well as overall for the Northwest screenline), and on the Mission and San Bruno/Bayshore corridors in the Southeast screenline, would increase and exceed the 85 percent capacity utilization standard during the PM peak hour. Those exceedances of the capacity utilization standard for the three corridors in the Northwest screenline and for the Northwest screenline as a whole, and for the two corridors in the Southeast screenline under 2040 Cumulative plus Variant B conditions would be considered a significant cumulative impact. However, Variant B would contribute less than 5 percent to this utilization, and therefore, would not have a considerable contribution to screenlines or corridors operating at greater than 85 percent capacity utilization. Because Variant B would result in the largest amount of net new transit trips of the LRCP scenarios, the LRCP would not contribute considerably to screenlines or corridors operating at greater than 85 percent capacity utilization. The LRCP would result in a less-than-significant impact on cumulative Muni transit conditions.

As shown in Table 4.8-19, Regional Transit Screenlines – Cumulative Conditions, PM Peak, for 2040 Cumulative plus Variant B conditions, all regional transit service providers are projected to operate under the capacity utilization standard of 100 percent during the PM peak hour.

Table 4.8-18: Muni Screenline Capacity Utilization – Cumulative Conditions, PM Peak

Screenline	Existing		Cumulative Plus Variant B	
	Ridership	Capacity Utilization	Ridership	Capacity Utilization
Kearny/Stockton	2,245	67%	8,326	76%
Other lines	683	63%	2,064	60%
Northeast Screenline Total	2,928	66%	10,391	72%
Geary	1,964	75%	3,620	83%
California	1,322	75%	2,021	97%
Sutter/Clement	425	67%	756	99%
Fulton/Hayes	1,184	89%	1,877	94%
Balboa	625	64%	973	80%
Northwest Screenline Total	5,519	76%	9,247	87%
Third Street	782	99%	5,712	40%
Mission	1,407	54%	3,008	90%
San Bruno/Bayshore	1,536	72%	2,134	85%
Other lines	1,084	65%	1,927	84%
Southeast Screenline Total	4,809	52%	12,781	66%
Subway lines	4,904	80%	6,803	84%
Haight/Noriega	977	63%	1,593	79%
Other lines	555	79%	840	45%
Southwest Screenline Total	6,435	76%	9,239	79%
Source: San Francisco Planning Department, 2015; Fehr & Peers, 2015.				

Table 4.8-19: Regional Transit Screenlines – Cumulative Conditions, PM Peak

Screenline	Existing		Cumulative 2040	
	Ridership	Capacity Utilization	Ridership	Capacity Utilization
East Bay				
BART	19,716	89.4%	30, 378	91.6%
AC Transit	2256	57.5%	7,000	58.3%
Ferries	805	49.8%	5,319	89.5%
Screenline Subtotal	22777	82.6%	42, 697	83.5%
North Bay				
Golden Gate Transit Bus	1384	49.1%	2, 069	73.5%
Ferries	968	49.4%	1,619	82.6%
Screenline Subtotal	2352	49.2%	3, 688	77.2%
South Bay				
BART	10682	71.6%	13, 970	57.8%
Caltrain	2377	76.7%	2, 528	70.3%
SamTrans	141	44.1%	150	46.9%
Screenline Subtotal	13200	75.6%	16,707	59.0%
Regional Subtotal	38330	75.6%	63,092	75.0%
Source: San Francisco Planning Department, May 2015; Fehr & Peers 2015				

As shown in Table 4.8-10, Net New Peak-Hour Trips by Mode, Variants A and B and the 100 McAllister Street scenario would increase transit trips by approximately 95, 118, and 17 trips, respectively, but this increase would be distributed across several routes, and would be relatively small in relation to available passenger throughput. Nearly all new transit trips associated with Variant A, Variant B, and 100 McAllister Street would be generated by the UCSF students living in 198 McAllister Street or 50 Hyde Street. As these residents would travel primarily between their UC Hastings residences and UCSF classes during the PM peak hour, travel would occur in the opposite direction of the local and regional transit screenlines, including the Northwest and Southeast screenlines. As a result, no increase in transit trips across any screenlines would be expected to result from the 100 McAllister Street, Variant A, and Variant B scenarios. Therefore, LRCP development would not cause the need for the development or expansion of transit facilities under cumulative conditions, and the cumulative impacts would be less than significant.

Parking

As noted previously, parking effects of the LRCP would not be considered significant impacts under CEQA, and this discussion of cumulative parking demand is provided for informational purposes.

LRCP development would result in additional parking demand at the UC Hastings campus that may exceed available parking supply at the UC Hastings Parking Garage. Unmet parking demand could be accommodated at off-site locations such as the Civic Center Parking Garage (which has available capacity, as noted in Section 4.8.1). The availability and cost of parking near UC Hastings may also cause people to convert to modes other than driving.

LRCP-generated parking demand that would not be met by the available parking supply would not be considered a significant impact.

Bicycle

Bicyclists would continue to access the UC Hastings campus via McAllister Street, Larkin Street, Golden Gate Avenue, and Hyde Street. Bicycle trips in the campus vicinity may increase due to general background growth in the area.

Variant A and Variant B would result in seven to 10 new bicycle trips to and from the UC Hastings campus. These small changes in bicycle activity would be distributed across several streets, including McAllister Street, Larkin Street, Golden Gate Avenue, and Hyde Street. Bicycle parking demand associated with UC Hastings trips would be adequately accommodated within the combined 100 secure spaces at 200 McAllister and the UC Hastings Parking Garage. Additional bicycle parking demand associated with student residents would be accommodated within the design of Variant A and Variant B.

The 100 McAllister Street scenario would result in approximately the same number of trips by bicycle, and would not change bicycle conditions such that substantial conflicts between modes would result. Therefore, the LRCP development would result in a less-than-significant impact related to cumulative bicycle conditions.

Pedestrian

The Variant A, Variant B, and 100 McAllister Street scenarios would result in minor changes to pedestrian circulation around the campus. The 100 McAllister Street scenario would result in six new pedestrian trips associated with new housing. Variants A and B would increase pedestrian trips by 73 and 92 trips, respectively, associated with new housing at 198 McAllister Street and 50 Hyde Street. Additionally, pedestrian trips in the vicinity of UC Hastings may increase due to general background growth in the area. All scenarios would shift pedestrian circulation patterns, as on-campus circulation would be between 200 McAllister Street and 333 Golden Gate Avenue, which may reduce the number of pedestrian trips across the intersection of Hyde

Street and McAllister Street. Overall, these changes in pedestrian activity would be minor in the context of the local transportation network, which adequately accommodates current pedestrian circulation and could accommodate any cumulative growth in pedestrian trips that may occur. Therefore, LRCP development would result in a less-than-significant impact related to cumulative pedestrian conditions.

Truck Loading

The Variant A, Variant B, and 100 McAllister Street scenarios would result in a minor net increase in deliveries associated with new campus housing; this demand would not be expected to substantially change existing loading activity. However, Variant A and Variant B would increase loading demand during the PM peak hour. Average loading demand would be less than one space, and loading demand for all scenarios could be accommodated within the existing loading dock at 200 McAllister Street. Therefore, LRCP development would result in a less-than-significant impact related to cumulative truck loading conditions.

Passenger Loading

Renovation of 100 McAllister Street would not result in significant delays or hazardous conditions associated with passenger loading demand relative to the existing condition. As part of 333 Golden Gate Avenue construction, some passenger loading demand may shift to 333 Golden Gate Avenue, which does not currently have passenger loading spaces. Existing passenger loading spaces are located on the block front. Additional passenger loading activity may occur at 100 McAllister Street, which does not have an immediately adjacent passenger loading space. These minor changes in demand would be accommodated by potential new passenger loading zones at the two locations. Therefore, the 333 Golden Gate Avenue and 100 McAllister Street scenarios would result in a less-than-significant impact related to cumulative passenger loading conditions.

Variant A and Variant B would not result in significant delays or hazardous conditions associated with passenger loading demand relative to the adequate accommodations of the existing conditions. Variants A and B would result in increased passenger loading demand associated with new housing. Passenger loading activity associated with passenger vehicles would be accommodated by existing facilities; however, passenger loading activity associated with the operation of UCSF shuttle service would be accommodated with new shuttle stops at the UC Hastings campus to serve both UC Hastings and UCSF students. Therefore, Variant A and Variant B scenarios would result in a less-than-significant impact related to cumulative passenger loading conditions.

Emergency Access

The LRCP would not substantially change existing emergency vehicle access. Emergency vehicles would retain access to the UC Hastings campus and would maintain circulation around adjacent streets without additional conflicts. Therefore, the LRCP would result in a less-than-significant impact related to cumulative emergency access conditions.

Construction

Overall, localized construction-related transportation impacts could occur as a result of cumulative projects that generate increased traffic at the same time and on the same roads as the LRCP developments. The construction manager for each project would work with the various city departments to develop a detailed and coordinated plan that would address construction vehicle routing, traffic control, and pedestrian movement adjacent to the construction area for the duration of any overlap in construction activity. Cumulative construction-related transportation impacts would be less than significant.

4.9 SHADOW

This section describes potential new shadow conditions that could occur with development under the LRCP, and applicable plans/policies as they relate to those topics. This section identifies potential impacts, if any, and mitigation measures, if necessary, to reduce those impacts to a less-than-significant level. As described in Chapter 3, Project Description, UC Hastings is a state entity, and is not subject to San Francisco jurisdiction. The San Francisco Planning Code includes specific requirements regarding shadow effects that could result from new development. This section discusses those standards, and, where appropriate, considers them as criteria for evaluating the significance of shadow impacts under CEQA.

4.9.1 Setting

UC Hastings is in the downtown Civic Center neighborhood of San Francisco, and owns and occupies five buildings and one undeveloped lot on the two blocks bounded by Golden Gate Avenue to the north, Larkin Street to the west, McAllister Street to the south, and Leavenworth Street to the east (see Chapter 3, Figure 3-1, Project Location). This area is characterized by dense urban development, including 14- to 20-story government buildings primarily west and south of the campus, and predominantly one- to six-story commercial, mixed-use, and residential buildings north of the campus. These existing buildings, including the UC Hastings buildings, currently cast shadows on surrounding areas throughout various daylight hours (see Figure 4.9-1, Aggregate Full-Year New Shadow, and Figure 4.9-3, June 21/Summer Solstice 8:00 AM Shadow Effect, through Figure 4.9-11, December 21/Winter Solstice 3:55 p.m. Shadow Effect, in Section 4.9.2, Impacts and Mitigation). Existing buildings on the UC Hastings campus that currently contribute shadows to the surrounding area are listed in Table 4.9-1, Height of Existing UC Hastings Buildings.

Table 4.9-1: Height of Existing UC Hastings Buildings

Building	Building Height (ft)
100 McAllister Street	308
198 McAllister Street	85
50 Hyde Street	75
200 McAllister Street	85
376 Larkin Street	80
Source: UC Hastings. September 2015. *Five Year Infrastructure Plan 2016–2021.*	

Public open space in the surrounding vicinity includes Civic Center Plaza one block southwest, bounded by Grove, Polk, McAllister, and Larkin Streets; UN Plaza south across McAllister Street, between Leavenworth and Hyde Streets; and Phillip Burton Plaza on the south side of the Phillip Burton Federal Building one block northwest, on Golden Gate Avenue between Larkin and Polk Streets.

Civic Center Plaza occupies a 4.43-acre double block that is under the jurisdiction of the San Francisco Recreation and Park Department (RPD). The plaza includes rows of flagpoles and landscaped grass panels along its north and south sides. Rows of pollarded sycamore trees, bisected by a crushed gravel strip, occupy the center of the plaza. Two children's play areas are in the northeast and southeast corners of the plaza along Larkin Street. All other areas of the plaza are paved walking areas. Existing shadows are cast over much of the plaza at various daylight hours throughout the year. During the summer solstice sunrise plus 1 hour and 1 hour before sunset periods, shadows created by existing structures located east and northeast of the plaza—primarily the Asian Art Museum on the east side of Larkin Street and 100 McAllister Street—cover the majority of the plaza. Similar conditions occur during the winter solstice 1 hour before sunset period. While not as extensive, other shadows intermittently occur over the plaza during other daylight hours.

The approximately 2.6-acre irregularly shaped UN Plaza is managed by the San Francisco Department of Public Works (DPW) and is paved with red brick, with the exception of several landscaped panels containing either grass or crushed gravel and pollarded trees. Existing shadows cover the entire plaza during the winter solstice sunrise plus 1 hour and 1 hour before sunset periods, as well as intermittently during other daylight hours.

Phillip Burton Plaza is a rectangular plaza on the southern frontage of the Federal Building along Golden Gate Avenue. The open space, managed by the Phillip Burton Federal Building, is concrete paved with the exception of several rows of street trees. As with UN Plaza, existing shadows cover the entire plaza during the winter solstice sunrise plus 1 hour and 1 hour before sunset periods, as well as intermittently during other daylight hours.

4.9.2 Impacts and Mitigation

Significance Criteria

New development would have a significant adverse shadow effect if newly shaded areas affected a public open space, taking into consideration the area shaded, uses of the open space, and the time of day, duration, and time of year of new shadow.

As previously noted, UC Hastings is not subject to San Francisco jurisdiction and the discussion of San Francisco Planning Code Section 295 below is included for informational purposes and context. However, the shadow analysis uses the parameters and methodology of Section 295 for the purpose of determining potential adverse shadow effects.[1]

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[1] PreVision Design. 2015. *Shadow Analysis Report for the Proposed UC Hastings Developments at 198 McAllister, 333 Golden Gate, and 50 Hyde Streets*. Prepared for UC Hastings. December 7, 2015.

In 1984, San Francisco adopted Proposition K, codified as Section 295 of the Planning Code, which protects certain public open spaces under the jurisdiction of the RPD from shadowing by new and altered structures during the period between 1 hour after sunrise and 1 hour before sunset, year round. Section 295 restricts new shadow upon public open spaces under RPD jurisdiction by any structure exceeding 40 feet in height, unless the Planning Commission finds that any adverse impact on use of the open space caused by the shadow would be insignificant.

The Planning Department guidelines for evaluation of shadow effects on RPD open space under Section 295 includes the analysis of the new shadow compared to existing shadow conditions in terms of amount of theoretical annual available sunlight (TAAS), which is presented in square foot hours (sfh).

Methodology

As noted, the shadow analysis applies the methodology of Planning Code Section 295 for the purpose of identifying potential adverse shadow impacts. The study analyzed a full-site rectangular massing for the three potential LRCP development sites—333 Golden Gate Avenue, 198 McAllister Street, and 50 Hyde Street—to determine potential impacts on open spaces.

Impact SH-1 The project would not create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas. ***Less-than-Significant Impact***

Shadows on Open Space

As previously noted, public open spaces in the vicinity include Civic Center Plaza, UN Plaza, and Phillip Burton Plaza; Civic Center Plaza is the only open space under the jurisdiction of the RPD.

Proposed LRCP development would include an up to approximately 90-foot-tall building at 333 Golden Gate Avenue, an up to approximately 140-foot-tall building at 198 McAllister Street, and an up to approximately 140-foot-tall building at 50 Hyde Street. The shadow analysis herein evaluated full-site rectangular massing buildings, with no setbacks or other architectural details.

The shadow analysis included a full-year aggregated shadow diagram, referred to as a "shadow fan," showing all areas where new shadow would fall at some point throughout the calendar year (see Figure 4.9-1). The shadow fan shows all street-level areas that would be newly shaded by LRCP development projects between 1 hour after sunrise to 1 hour before sunset, at any time of the year. The shadow fan accounts for existing shade cast by buildings on the LRCP sites and other surrounding buildings.

The shadow fan shows that the development at 198 McAllister Street with LRCP Variant A and Variant B would add shade to parts of Civic Center Plaza, Phillip Burton Plaza, and UN Plaza. Development with the LRCP at 50 Hyde Street with Variant B and at 333 Golden Gate Avenue would add shade to parts of Phillip Burton Plaza.

Source: PreVision Design

FIGURE 4.9-1: AGGREGATE FULL-YEAR NEW SHADOW

198 McAllister Street - Variant A Shadow Effects

Civic Center Plaza encompasses a 4.43-acre area, which at times is heavily shaded by existing buildings in the surrounding vicinity. As shown in Figure 4.9-1, potential shadow impacts from proposed LRCP development projects would affect the Civic Center Plaza in the northeast corner. As discussed in the following paragraphs, shadows would be limited to paved and landscaped areas that are part of the park, and an automobile ramp. The existing children's playground in the northeast portion of the plaza would not be affected.

A 140-foot-tall building at 198 McAllister Street would add shade to Civic Center Plaza within the first approximately 39 minutes of the sunrise plus 1 hour period from May 18 to July 25. The duration of shading would start at approximately 1 minute on May 18, and reach a maximum duration of approximately 39 minutes on June 21 (6:48 a.m. to 7:27 a.m.). The maximum effect on June 21 is shown in Figure 4.9-2, Maximum LRCP Shadow Effect on Civic Center Plaza. The duration would then decrease until shading would again be approximately 1 minute on July 25. Most of the new shade in the park would be on paved walking areas, a tree bed, and a lawn area just north of the existing children's playground; the playground itself would not be affected. The shade would also cover the automobile ramp to the Civic Center Plaza below-grade parking garage.

LRCP development at 198 McAllister Street would add shade to Civic Center Plaza for up to 39 minutes after the sunrise plus 1 hour period on an area of the plaza primarily serving as walkways or automobile ramps. The new shade would occur during early morning (before 8:00 a.m.) periods of low use of Civic Center Plaza, and would not affect the children's playgrounds. The effect would increase square foot hours of annual shading by 0.002 percent. Therefore, the LRCP would not create new shade that would substantially affect outdoor recreation uses at Civic Center Plaza, and the shadow impact would be less than significant.

For information, the TAAS at Civic Center Plaza is 717,981,871 sfh, which is considered to be the amount of sun that would fall on the park throughout the year if there were no shading present at any time. Existing shade cast on Civic Center Plaza totals 57,105,180 sfh, resulting in the plaza being shaded 7.95 percent of the time. The remaining permitted shadow load at Civic Center Plaza under Planning Department criteria is about 0.0035 percent.[2] The shadow analysis calculations determined that LRCP development at 198 McAllister Street would contribute an additional 17,126 sfh annually, constituting a 0.002 percent increase. This would be below the permitted shadow load at Civic Center Plaza.

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2 San Francisco Planning Commission Motion No. 17290. Case No. 2002.1179K, 1167 Market Street, Findings on Net New Shadow on Civic center Plaza and Howard-Langton Mini Park. August 3, 2006.

Source: PreVision Design

FIGURE 4.9-2: MAXIMUM LRCP SHADOW EFFECT ON CIVIC CENTER PLAZA

LRCP development at 198 McAllister Street would cast new shadow on the southeast corner of Phillip Burton Plaza. These effects would occur at intermittent times before 9:00 a.m. around the times of the September 21 and March 21 equinoxes. The shading would occur for less than 1 hour on walkways and paved areas of the plaza. The shading would not affect landscaped areas. The plaza does not provide active recreation areas. These impacts would not be substantial beyond current shadow conditions at the plaza, and impacts on use of this open space would be less than significant.

LRCP development at 198 McAllister Street would cast new shadow on part of UN Plaza south of McAllister Street. These effects would occur for less than 1 hour after 6:00 p.m., around the time of the June 21 summer solstice. This part of UN Plaza includes a paved walkway and landscaped areas; there are no benches or recreation facilities. The shading would affect less than 10 percent of UN Plaza, near the McAllister Street sidewalk, during the late afternoon for less than 1 hour. This part of the plaza is primarily a walkway, compared to the larger active use areas of UN Plaza closer to Market Street. These impacts would not be substantial beyond current shadow conditions at the plaza, and impacts on use of this open space would be less than significant.

Chapter 5, Alternatives, includes Alternative B, 198 McAllister Reduced Building Alternative. This alternative would be the development of a building at 198 McAllister Street with reduced massing that would not add shade to Civic Center Plaza at any time between 1 hour after sunrise and 1 hour before sunset, year round.

333 Golden Gate Avenue and 50 Hyde Street – Variant B Shadow Effects

Other shadow effects of LRCP development over different times of day and year would add shading to sidewalks in the UC Hastings vicinity. Figures 4.9-3, June 21/Summer Solstice 8:00 AM Shadow Effect, through 4.9-11, December 21/Winter Solstice 3:55 PM Shadow Effect, show shadow conditions at 8:00 a.m., 12:00 noon, and 4:00 p.m., on June 21, the summer solstice; September 21/March 21, the autumnal and vernal equinoxes; and 8:22 a.m., 12:00 noon, and 3:55 p.m., on December 21, the winter solstice. The figures illustrate net new shading from 333 Golden Gate Avenue, 198 McAllister Street, and 50 Hyde Street with different color patterns.

Potential development at 333 Golden Gate Avenue and 50 Hyde Street would not cast new shadow on RPD open space or on UN Plaza. Development at 333 Golden Gate Avenue would cast new shadow on the southeast corner of Phillip Burton Plaza. These effects would occur at intermittent times before 9:00 a.m. around the times of the September 21 and March 21 equinoxes. The shading would occur for less than 1 hour on walkways and paved areas of the plaza. These impacts would not be substantial beyond current shadow conditions at the plaza, and impacts on use of this open space would be less than significant.

Source: PreVision Design

FIGURE 4.9-3: JUNE 21/SUMMER SOLSTICE 8:00 AM SHADOW EFFECT

Source: PreVision Design

FIGURE 4.9-4: JUNE 21/SUMMER SOLSTICE 12:00 PM SHADOW EFFECT

Source: PreVision Design

FIGURE 4.9-5: JUNE 21/SUMMER SOLSTICE 4:00 PM SHADOW EFFECT

Source: PreVision Design

FIGURE 4.9-6: MARCH 21/SEPTEMBER 21 VERNAL/AUTUMNAL EQUINOX 8:00 AM SHADOW EFFECT

Source: PreVision Design

FIGURE 4.9-7: MARCH 21/SEPTEMBER 21 VERNAL/AUTUMNAL EQUINOX 12:00 PM SHADOW EFFECT

FIGURE 4.9-8: MARCH 21/SEPTEMBER 21 VERNAL/AUTUMNAL EQUINOX 4:00 PM SHADOW EFFECT

FIGURE 4.9-9: DECEMBER 21/WINTER SOLSTICE 8:22 AM SHADOW EFFECT

Source: PreVision Design

FIGURE 4.9-10: DECEMBER 21/WINTER SOLSTICE 12:00 PM SHADOW EFFECT

Source: PreVision Design

FIGURE 4.9-11: DECEMBER 21/WINTER SOLSTICE 3:55 PM SHADOW EFFECT

Shadows on Sidewalks

Potential development under the LRCP would cast net new shadow on nearby sidewalks and buildings at certain times of day throughout the year. However, many of the sidewalks and buildings in this part of San Francisco are already shadowed for much of the day by densely developed, multi-story buildings, and additional LRCP-related shadow would not substantially affect the use of sidewalks, or alter the amount of shading on nearby properties.

For the previously discussed reasons, development under the LRCP would not create new shadow that would substantially affect outdoor recreation facilities or other public areas, and shadow impacts would be less than significant.

4.9.3 Cumulative Impacts

LRCP development projects would have less-than-significant shadow-related effects on the use of nearby open space. The shadow impacts on San Francisco RPD open space at Civic Center Plaza would occur during the first approximately 39 minutes of the sunrise plus 1 hour period from May 18 to July 25. However, these effects were found to be less than significant.

Other potential projects in the area could contribute new cumulative shadows to the Civic Center Plaza. The shadow analysis herein included under-review and approved development projects in the vicinity of UC Hastings, specifically the approved 80-foot-tall 101 Hyde Street project, that would potentially affect shading conditions on Civic Center Plaza. The LRCP shading would be the net effect. Any other projects subject to San Francisco jurisdiction that could potentially add shadow on Civic Center Plaza would be reviewed under Planning Code Section 295, and would not be approved unless the Planning Commission determines that the new shade would not have a significant adverse effect on the use of RPD open space.

For these reasons, development under the LRCP, in combination with other past, present, and reasonably foreseeable future projects, would not result in cumulatively considerable shadow impacts.

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4.10 WIND

This section describes potential new wind conditions that could occur with development under the LRCP, and applicable plans and policies related to wind. This section identifies potential impacts, if any, and mitigation measures, if necessary, to reduce those impacts to a less-than-significant level. As described in Chapter 3, Project Description, UC Hastings is a state entity, and is not subject to San Francisco jurisdiction. The San Francisco Planning Code includes specific criteria relating to pedestrian-level hazardous wind conditions resulting from new development in certain zoning districts. This section discusses those standards, and where appropriate, considers them as criteria for evaluating the significance of wind impacts under CEQA.

4.10.1 Setting

Average wind speeds in San Francisco are the highest in the summer and lowest in winter. However, the strongest peak winds occur in winter. Throughout the year, the highest wind speeds occur in mid-afternoon and the lowest in the early morning. West-northwest, west, northwest, and west-southwest are the most frequent and strongest of primary wind directions during all seasons (referred to as prevailing winds).

Tall buildings and exposed structures can strongly affect the wind environment for pedestrians. A building that stands alone or is much taller than the surrounding buildings can intercept and redirect winds that might otherwise flow overhead, and bring them down the vertical face of the building to ground level, where they create ground-level wind and turbulence. These redirected winds can be relatively strong, turbulent, and incompatible with the intended uses of nearby ground-level spaces. A building with a height that is similar to the heights of surrounding buildings typically would cause little or no additional ground-level wind acceleration and turbulence. Thus, wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. In general, new buildings less than approximately 80 feet in height are unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would be uncomfortable. Such winds may exist under existing conditions, but shorter buildings typically do not cause substantial changes in ground-level winds.

Tall buildings that have the potential to redirect winds—such as the government buildings, including the Phillip Burton Federal Building and the California State Building to the west—are located within the immediate vicinity of UC Hastings.

4.10.2 Impacts and Mitigation

Significance Criteria

New development that would be 80 feet in height or taller would be considered to have significant adverse wind effects if pedestrian-level wind speeds were to exceed 26 miles per hour (mph). That is a speed where wind gusts can blow people over, and therefore, is hazardous.

San Francisco Planning Code Section 148, Reduction of Ground-level Wind Currents in C-3 Districts, outlines wind-reduction criteria for projects in C-3 districts. The UC Hastings campus is within C-3-G, Downtown Commercial – General, P – Public Use, and RC-4, Residential-Commercial High Density districts. The 100 McAllister Street Tower is the only UC Hastings property within a C-3 district (refer to Section 4.6, Land Use and Planning, for a description of local zoning). The Planning Code sets criteria for comfort and hazards, and requires buildings to be shaped so as not to cause ground-level wind currents to exceed these criteria. As a state entity, those criteria would not be applicable to LRCP development at UC Hastings; however, for the purposes of evaluating impacts under CEQA, this analysis uses the Section 148 hazard criterion to determine whether development with the LRCP would alter wind in a manner that would substantially affect public areas.

The Planning Code pedestrian comfort criterion of 11 mph is based on wind speeds measured and averaged over a period of 1 minute. In contrast, the Planning Code wind hazard criterion of 26 mph is defined by a wind speed that is measured and averaged over a period of 1 hour. When stated on the same time basis as the comfort criterion wind speed, the hazard criterion wind speed (26 mph averaged over 1 hour) is equivalent to a 1-minute average of 36 mph, which is a speed where wind gusts can blow people over, and therefore, is hazardous. As noted, the analysis uses the hazard criterion to determine significant effects under CEQA. Effects related to the comfort criterion are presented for informational purposes.

Methodology

A wind study evaluated potential development under the LRCP to determine whether the LRCP would create hazardous wind conditions, a significant effect under CEQA.[1] The study used Section 148 testing, analysis, and evaluation methods.

To study wind conditions in the area and those generated by potential LRCP development, a wind tunnel model was used that included the UC Hastings campus and all relevant surrounding buildings and topography within a 1,500-foot radius. As shown in Figure 4.10-1, Pedestrian Wind Comfort Conditions – Existing, through Figure 4.10-4, Pedestrian Wind Comfort Conditions – 333 Golden Gate Avenue, 198 McAllister Street, 50 Hyde Street, and

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[1] RWDI. 2015. University of California Hastings College of the Law. San Francisco, CA, Pedestrian Wind Conditions Consultation - Wind Tunnel Tests, RWDI #1600144. November 20, 2015.

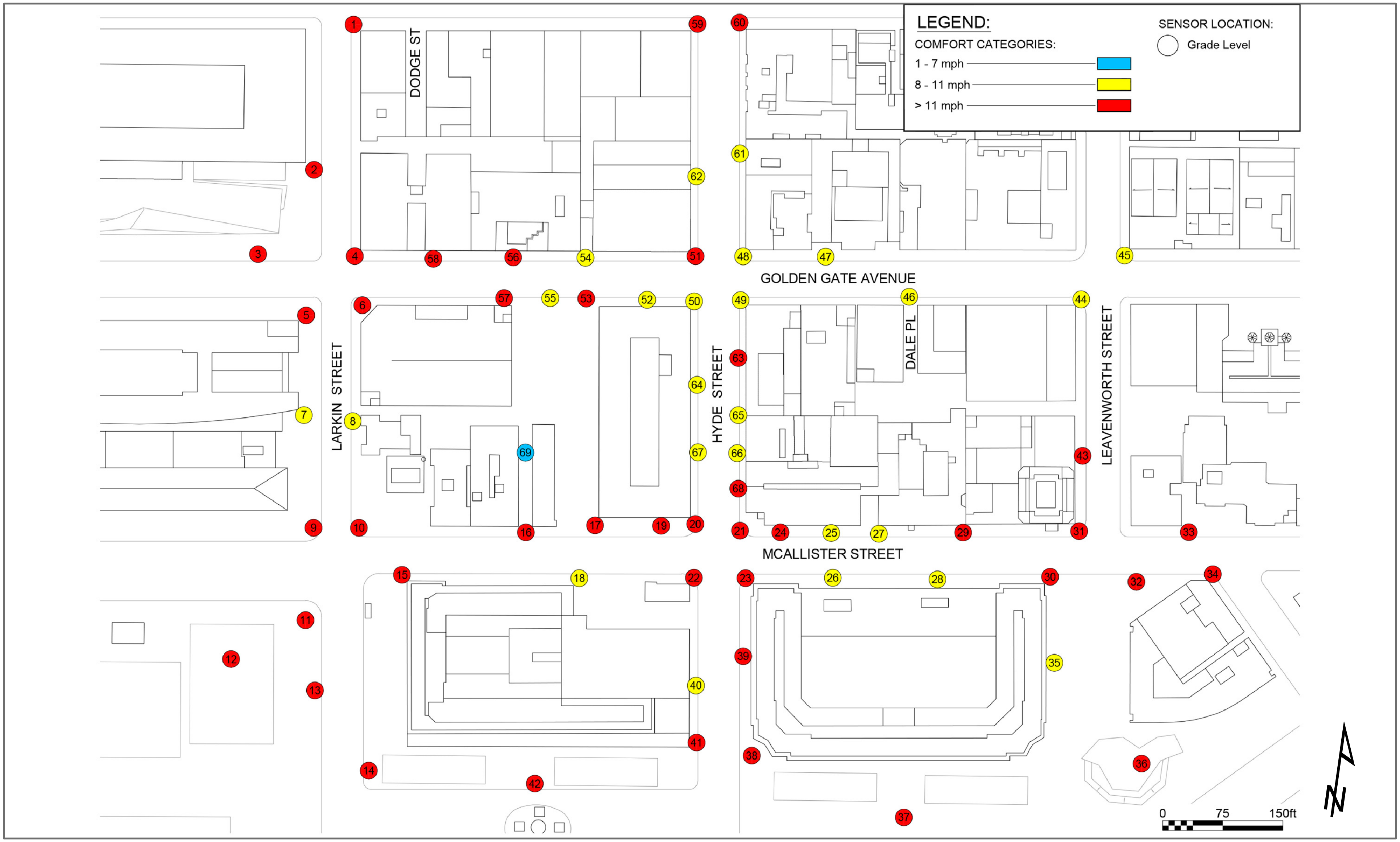
Cumulative, the model used 69 wind speed sensors to measure mean and gust wind speeds. These measurements were recorded and analyzed for the west-southwest, west, west-northwest, and northwest wind directions, following the Planning Code's methodology.

The wind tunnel testing analyzed conditions with the following four scenarios:

- **Scenario A – Existing**: Including all existing UC Hastings buildings and other existing buildings within the surrounding radius
- **Scenario B – Existing plus 333 Golden Gate Avenue**: Scenario A conditions, plus proposed LRCP development at 333 Golden Gate Avenue
- **Scenario C – Existing plus 333 Golden Gate Avenue, 198 McAllister Street, and Cumulative Conditions**: proposed LRCP development at 333 Golden Gate Avenue and 198 McAllister Street (Variant A), and cumulative development
- **Scenario D – Existing plus 333 Golden Gate Avenue, 198 McAllister Street, 50 Hyde Street, and Cumulative Conditions**: proposed LRCP development at 333 Golden Gate Avenue; 198 McAllister Street and 50 Hyde Street (Variant B); and cumulative development

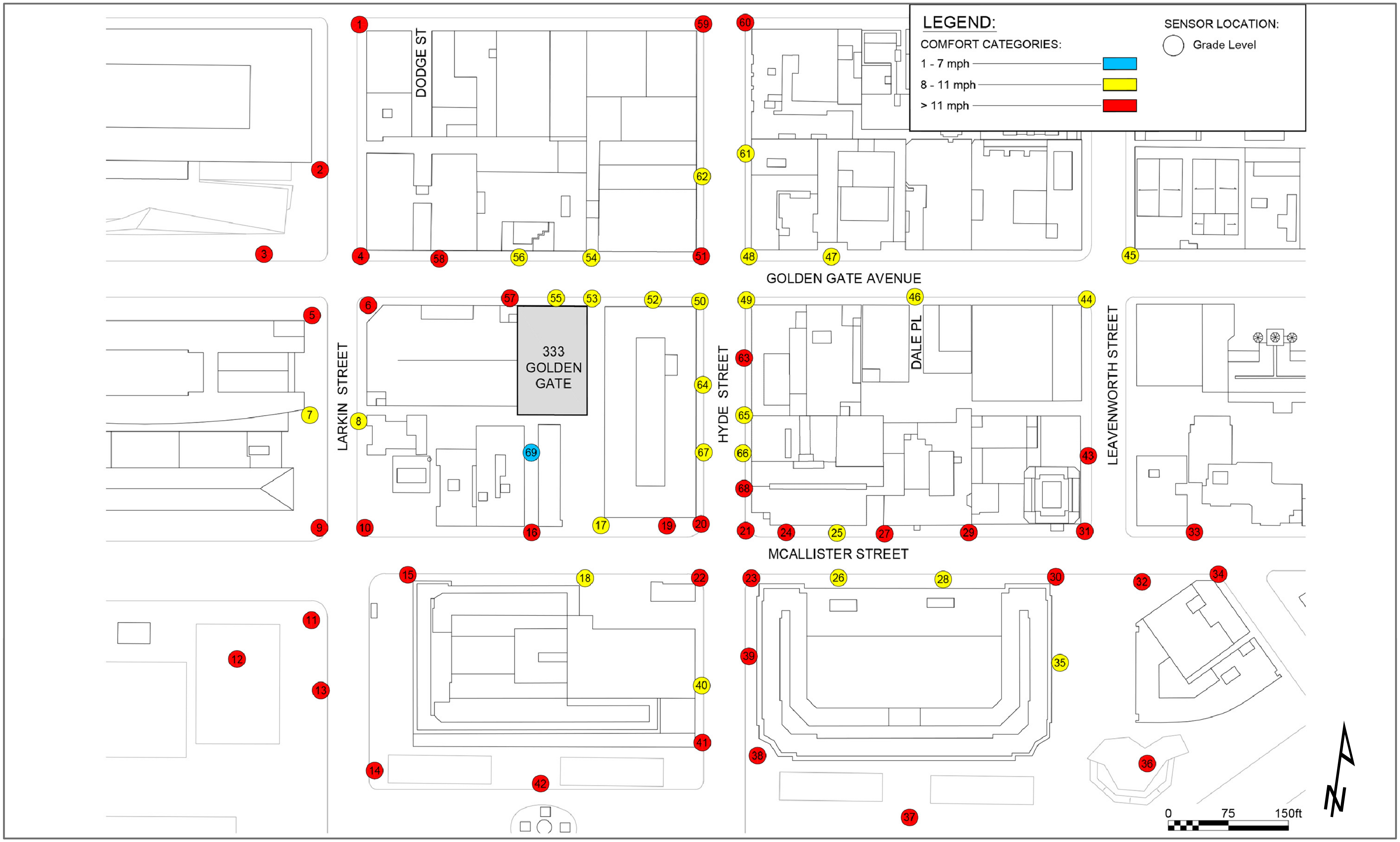
It is noted that the wind tunnel testing in Scenarios B, C, and D analyzed the maximum massing of potential LRCP development at 333 Golden Gate Avenue, 198 McAllister Street, and 50 Hyde Street. The models tested were the full 90-foot height at 333 Golden Gate Avenue, and the full 140-foot height at 198 McAllister Street and 50 Hyde Street. Future design of LRCP projects would likely include architectural features such as setbacks, street and frontage plantings, articulation of building facades, or a variety of materials that would be expected to vary and reduce pedestrian-level wind effects of LRCP development. The testing also did not model the existing mature street-tree plantings on the west sidewalk of Hyde Street between McAllister Street and Golden Gate Avenue. Such landscaping would be expected to reduce adverse wind conditions on adjacent sidewalks. Thus, the results of the analysis of wind effects presented herein are considered conservative.

To represent future conditions at the time Variant A or Variant B would be completed (sometime after 2020), cumulative development in Scenarios C and D included 10 projects within an approximately four-block radius that are currently under review or approved. This radius represents areas where new development could potentially affect wind conditions around the UC Hastings campus. Scenarios C and D used information obtained from the San Francisco Planning Department. Projects within the study area that are currently under construction were included in all test scenarios. The testing results determined wind comfort and wind hazard conditions at 69 locations, as shown in Figure 4.10-1, Pedestrian Wind Comfort Conditions – Existing, through Figure 4.10-7, Pedestrian Wind Hazard Conditions – 333 Golden Gate Avenue, 198 McAllister Street, 50 Hyde Street, and Cumulative. Tested conditions were then compared against Planning Code Section 148 criteria to determine potentially significant impacts associated with LRCP development.



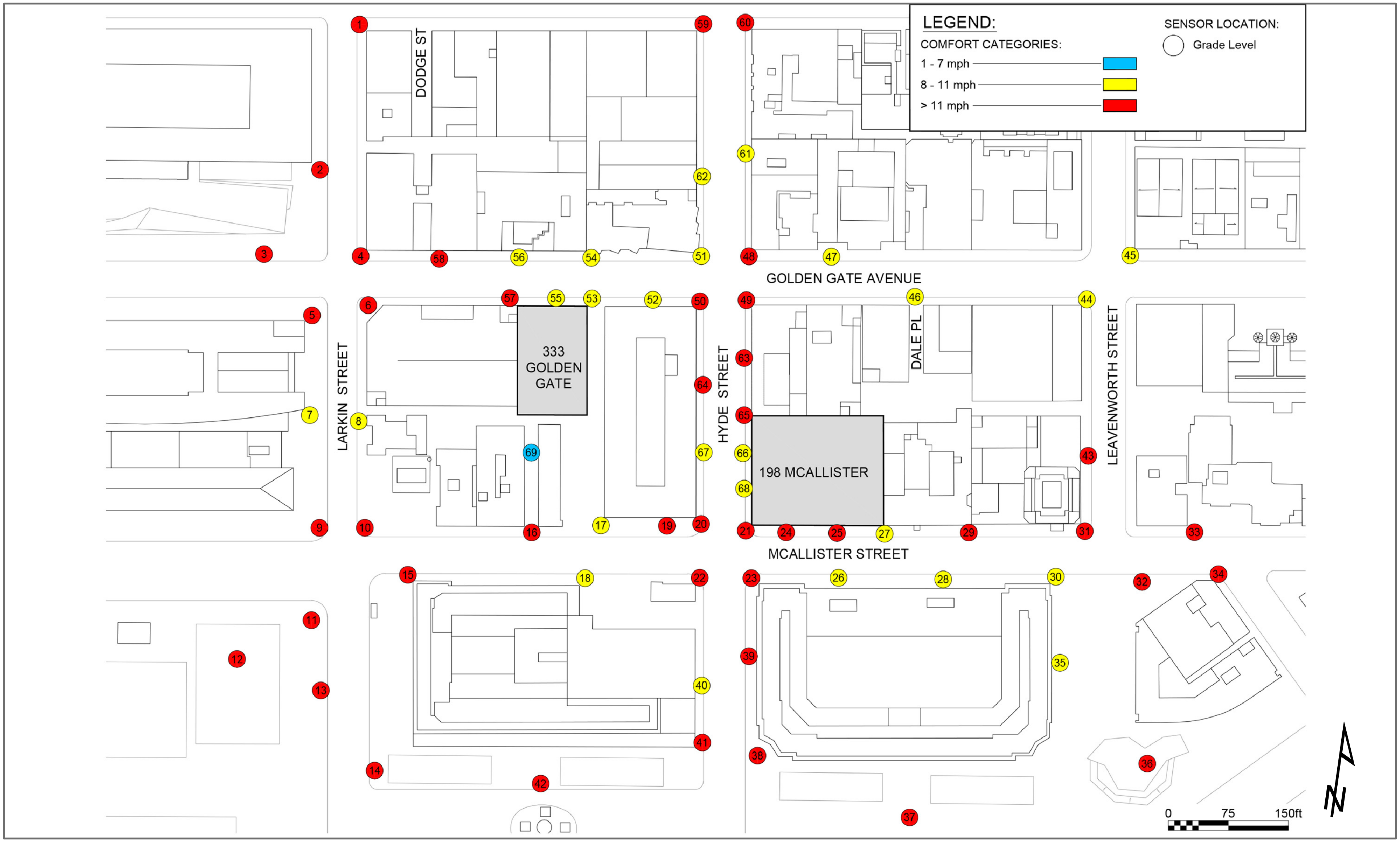
Source: RWDI

FIGURE 4.10-1: PEDESTRIAN WIND COMFORT CONDITIONS - EXISTING



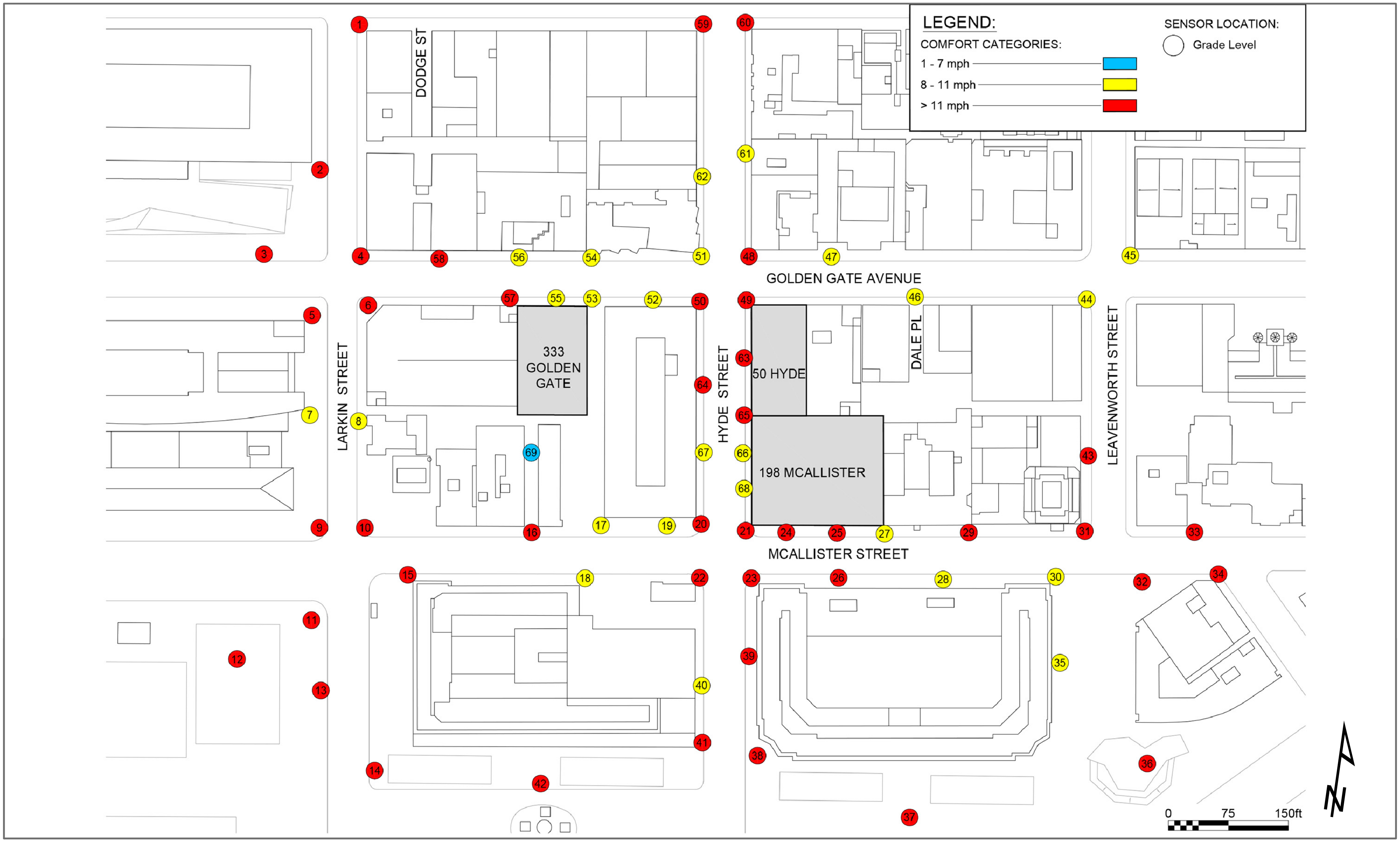
Source: RWDI

FIGURE 4.10-2: PEDESTRIAN WIND COMFORT CONDITIONS - EXISTING PLUS 333 GOLDEN GATE AVENUE



Source: RWDI

FIGURE 4.10-3: PEDESTRIAN WIND COMFORT CONDITIONS - 333 GOLDEN GATE AVENUE, 198 MCALLISTER STREET, AND CUMULATIVE



Source: RWDI

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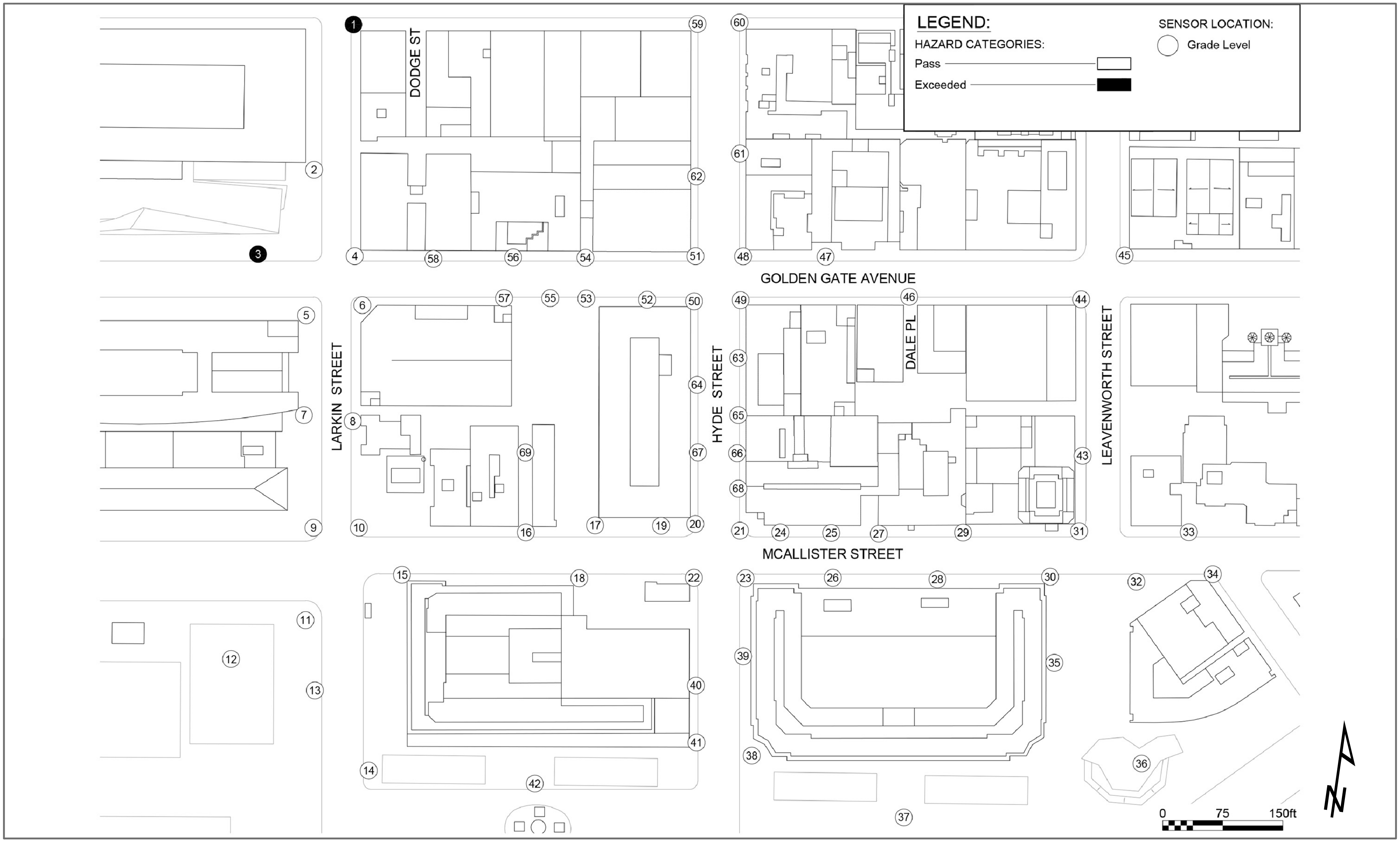
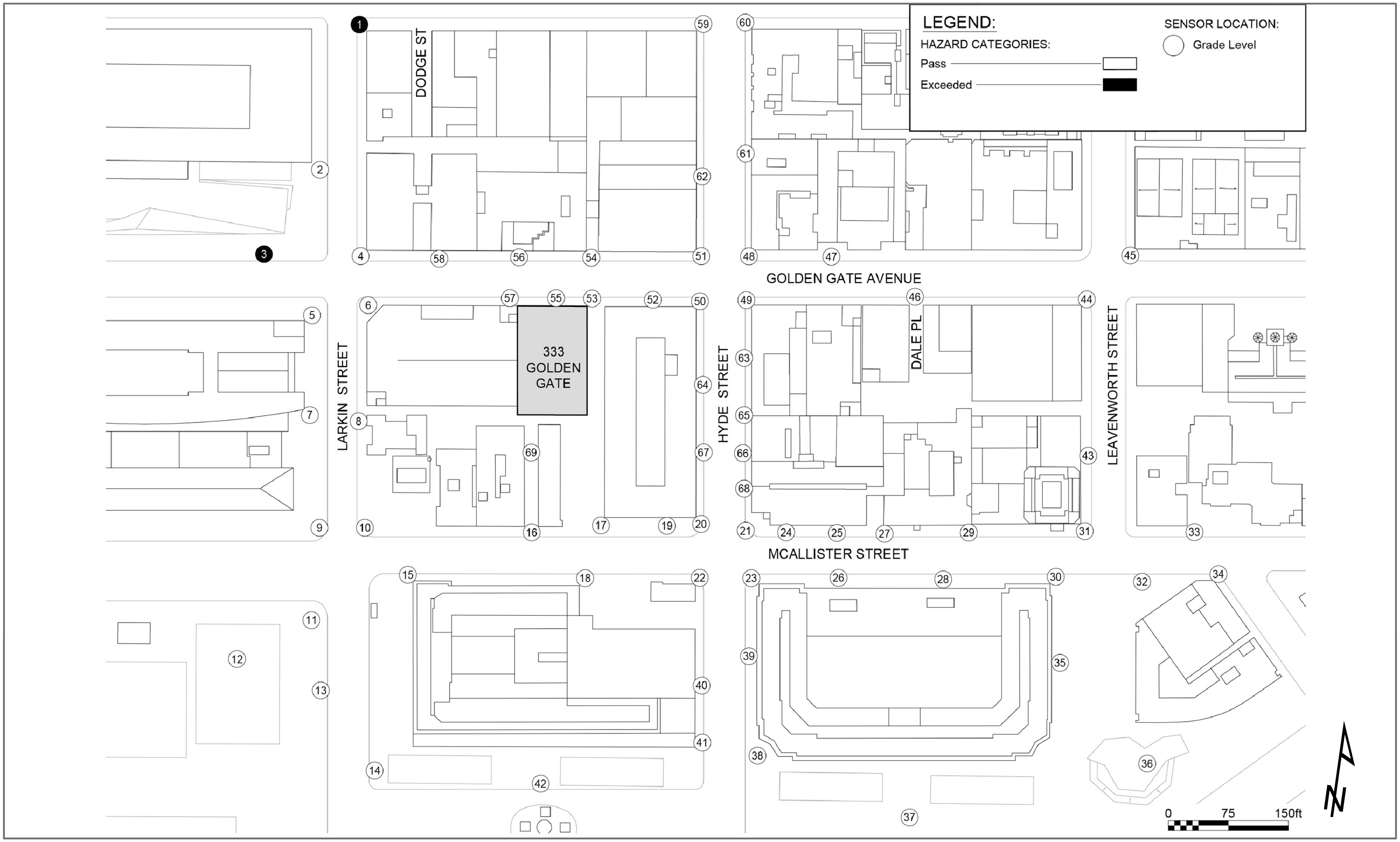
FIGURE 4.10-4: PEDESTRIAN WIND COMFORT CONDITIONS - 333 GOLDEN GATE AVENUE, 198 MCALLISTER STREET, 50 HYDE STREET, AND CUMULATIVE



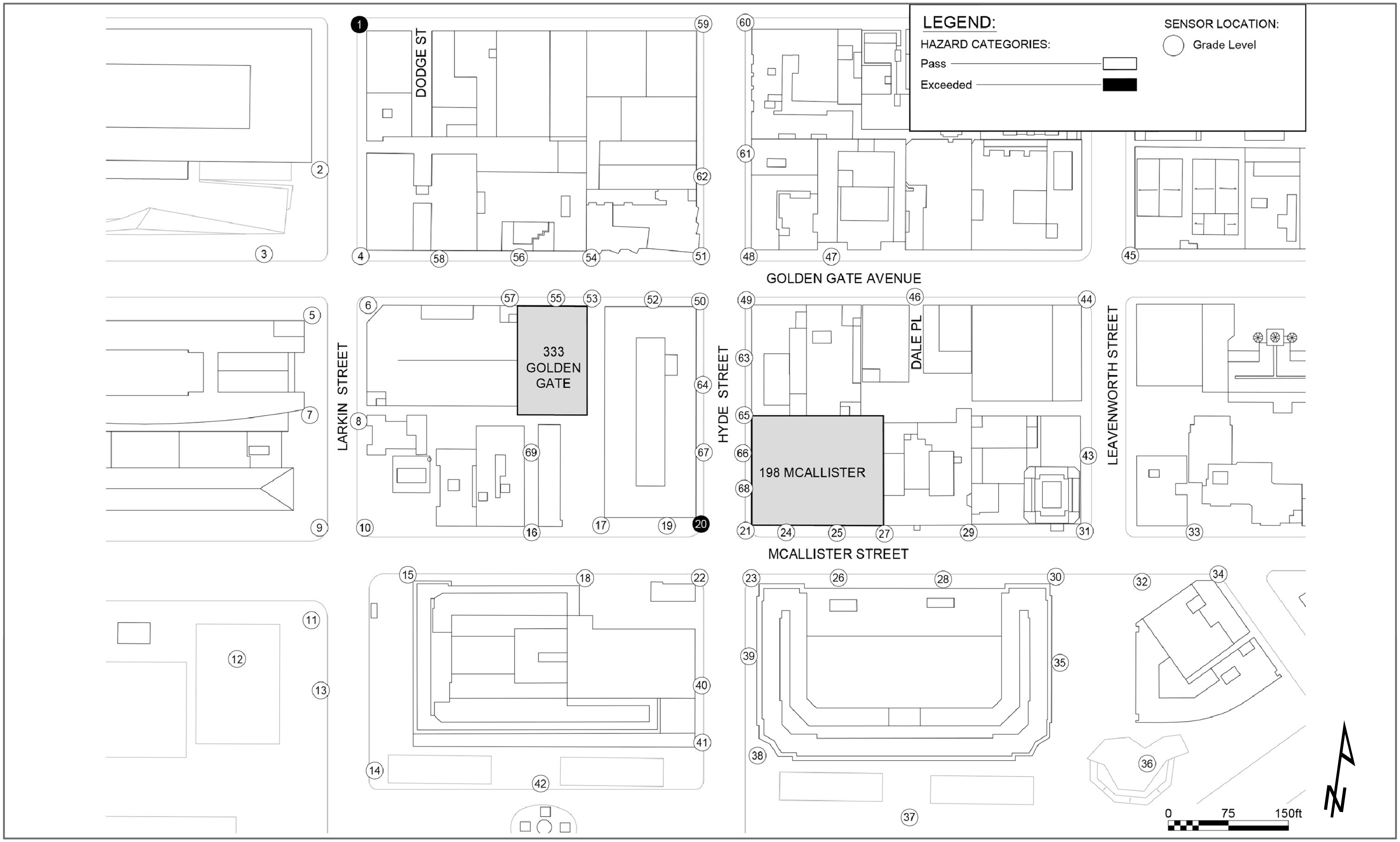
Source: RWDI

FIGURE 4.10-5: PEDESTRIAN WIND HAZARD CONDITIONS - EXISTING



Source: RWDI

FIGURE 4.10-6: PEDESTRIAN WIND HAZARD CONDITIONS - EXISTING PLUS 333 GOLDEN GATE AVENUE



Source: RWDI

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FIGURE 4.10-7: PEDESTRIAN WIND HAZARD CONDITIONS - 333 GOLDEN GATE AVENUE, 198 MCALLISTER STREET, AND CUMULATIVE

Impacts

Impact WI-1 The project could alter wind in a manner that substantially affects public areas. ***Less than Significant With Mitigation***

Wind Comfort Conditions

When determining impacts under CEQA, wind comfort conditions do not constitute potential impacts or significance criteria. However, comfort conditions help establish tangible measurements for determining wind effects experienced at the pedestrian level, and are discussed here for informational purposes.

Wind tunnel testing concluded that under existing conditions at the campus and the surrounding area, 43 of the 69 measurement locations exceed the Planning Code's 11 mph pedestrian comfort criterion (see Figure 4.10-1, Pedestrian Wind Comfort Conditions – Existing). Under Scenario B, the addition of the 333 Golden Gate Avenue development would result in 41 of 69 measurement locations exceeding the pedestrian comfort criterion (see Figure 4.10-2, Pedestrian Wind Comfort Conditions – Existing plus 333 Golden Gate Avenue).

Scenario C, with the addition of the new 198 McAllister Street building with Variant A, and Scenario D, the addition of both the 198 McAllister Street and 50 Hyde Street buildings with Variant B, along with future cumulative development, would result in 43 of 69 measurement locations exceeding the pedestrian comfort criteria (see Figure 4.10-3, Pedestrian Wind Comfort Conditions – 333 Golden Gate Avenue, 198 McAllister Street, and Cumulative, and Figure 4.10-4, Pedestrian Wind Comfort Conditions – 333 Golden Gate Avenue, 198 McAllister Street, 50 Hyde Street, and Cumulative).

Under all tested scenarios, the average wind speed of 13 mph would not change. Also, under all scenarios, the percentage of time that wind speeds would exceed 11 mph, the comfort criterion threshold, would decrease from 18 percent to 17 percent. Overall, development with the LRCP would not be expected to worsen local wind comfort conditions.

Wind Hazard Conditions

As previously noted, Planning Code Section 148 outlines wind speed criteria for projects in C-3 districts. Wind hazard conditions exceeding Section 148 criteria would be considered significant impacts under CEQA. While no new construction under the LRCP would occur in a C-3 zoning district, these thresholds were used to determine whether LRCP development could generate potentially significant wind hazard conditions.

Wind tunnel testing found that the wind hazard criterion is currently exceeded at two locations northwest of the project site. One location is at the southeast corner of Larkin Street and Turk Street, the second is at the southeast corner of Phillip Burton Plaza near the corner of Larkin Street and Golden Gate Avenue (see Locations 1 and 3 in Figure 4.10-5, Pedestrian Wind

Hazard Conditions – Existing). Winds at these locations would exceed the Planning Code's hazard criterion by 1 mph for no more than 2 hours per year.

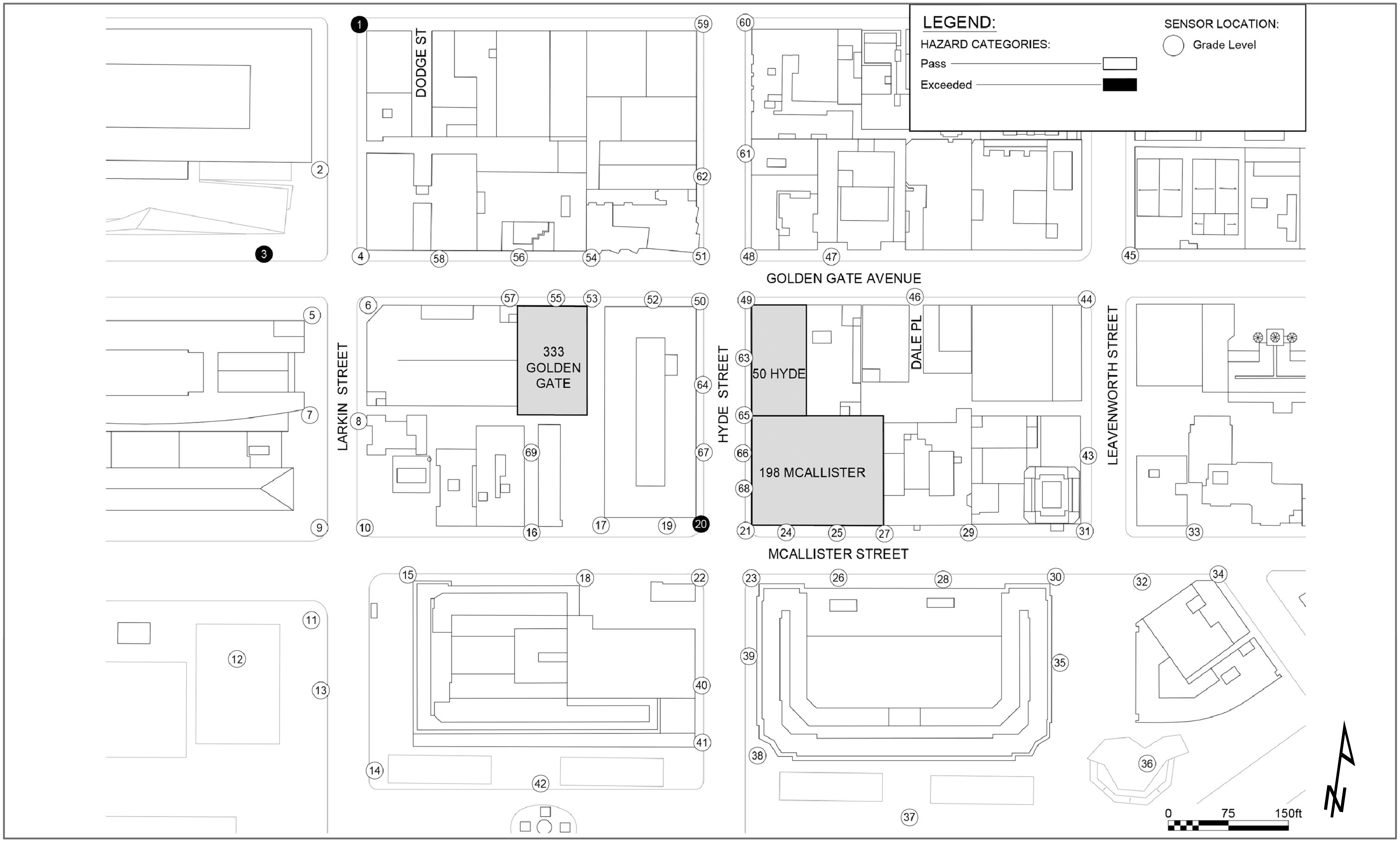
Under Scenario B, the addition of the 333 Golden Gate Avenue building would not increase the number of locations with wind hazard exceedances (see Figure 4.10-6, Pedestrian Wind Hazard Conditions – Existing plus 333 Golden Gate Avenue). The duration of hazard conditions at Locations 1 and 3 would increase by 1 hour per year. Because the development of 333 Golden Gate Avenue would not change the number of locations that would exceed the wind hazard criterion, this would be a less-than-significant impact.

Under Scenario C, construction of the 198 McAllister Street building with Variant A, and cumulative development, would avoid the existing wind hazard exceedance at Location 3, Phillip Burton Plaza. The duration of hazard conditions at Location 1 would increase by 2 hours per year from existing conditions.

As tested in Scenario C, Variant A would result in one new hazard exceedance at the northwest corner of McAllister and Hyde Streets (see Location 20 in Figure 4.10-7, Pedestrian Wind Hazard Conditions – 333 Golden Gate Avenue, 198 McAllister Street, and Cumulative). This exceedance would be 1 mph over the criterion threshold for a total of 2 hours per year.

Under Scenario D, development at 333 Golden Gate Avenue, 198 McAllister Street and 50 Hyde Street (Variant B), and cumulative development, would result in an exceedance at McAllister and Hyde Streets, Location 20, as with Variant A conditions. The duration of hazard conditions would be 3 hours per year (see Figure 4.10-8, Pedestrian Wind Hazard Conditions – 333 Golden Gate Avenue, 198 McAllister Street, 50 Hyde Street, and Cumulative). The two hazard exceedances with existing conditions, Locations 1 and 3, would occur with Scenario D. The two locations would exceed the hazard criterion by 1 mph for no more than 2 hours per year, as with existing conditions shown in Figure 4.10-5, Pedestrian Wind Hazard Conditions – Existing.

Variant A and Variant B would create an exceedance of the hazardous wind criterion near the entrance of the 200 McAllister Street building (Location 20). On the basis of the tested scenarios, the wind hazard exceedance at Location 20 is directly related to potential development at 198 McAllister Street. As noted previously, the wind tunnel testing analyzed the maximum massing of at 198 McAllister Street, and is considered conservative. Future detailed design would likely include architectural features such as setbacks, street and frontage plantings, articulation of building facades, or a variety of materials that would be expected to vary and reduce pedestrian-level wind effects.



Source: RWDI

FIGURE 4.10-8: PEDESTRIAN WIND HAZARD CONDITIONS - 333 GOLDEN GATE AVENUE, 198 MCALLISTER STREET, 50 HYDE STREET, AND CUMULATIVE

MM-WI-1 would require wind tunnel testing of the detailed design of 198 McAllister Street to identify design features that would eliminate the wind hazard exceedance at Location 20, and would reduce this impact to a less-than-significant level.

MM-WI-1: 198 McAllister Street Building Design Wind Analysis

Prior to design approval of LRCP development at 198 McAllister Street, UC Hastings shall retain a qualified wind consultant to determine if the building design would result in wind impacts that could exceed the threshold of 26-mph-equivalent wind speed for a single hour during the year. The wind analysis shall be conducted to assess wind conditions for the proposed building in conjunction with the anticipated pattern of development on surrounding blocks. The wind tunnel testing may identify design changes that would mitigate the adverse wind conditions to below the wind hazard criterion threshold. These design changes could include, but are not limited to, wind-mitigating features such as building setbacks, placement of awnings on building frontages, street and frontage plantings, articulation of building facades, or the use of a variety of architectural materials. Implementation of these design changes would reduce the wind hazard impact to a less-than-significant level.

Implementation of MM-WI-1 would reduce hazardous wind effects to below the cited threshold and would ensure safety in pedestrian access areas. With implementation of MM-WI-1, the potential impact would be less than significant.

Chapter 5, Alternatives, includes Alternative B, 198 McAllister Reduced Building Alternative, which would develop a building at 198 McAllister Street with reduced massing that also would avoid the wind hazard exceedance at Location 20.

4.10.3 Cumulative Impacts

As previously discussed, to represent future conditions at the time Variant A or Variant B would be completed (sometime after 2020), cumulative development in Scenarios C and D included 10 projects within an approximately four-block radius of UC Hastings that are either under review or approved. This radius represents areas where new development could potentially affect wind conditions around the UC Hastings campus. Scenarios C and D used information obtained from the San Francisco Planning Department. Projects within the study area that are currently under construction were included in all test scenarios.

With the exception of the hazardous wind exceedance at one location at the northwest corner of Hyde and McAllister Streets with development of 198 McAllister Street, LRCP development—including 333 Golden Gate Avenue and 50 Hyde Street—in combination with other surrounding past, present, and future developments, would not generate wind hazard exceedances. With the implementation of MM-WI-1, 198 McAllister Street Building Design Wind Analysis, wind hazard conditions related to LRCP development at 198 McAllister Street would be reduced to a less-than-significant level. Thus, the cumulative impact would be less than significant.

5. ALTERNATIVES

5.1 INTRODUCTION

This chapter identifies alternatives to the proposed Long Range Campus Plan (LRCP) and discusses environmental impacts associated with each alternative. Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines requires an evaluation of "a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects, and evaluate the comparative merits of the alternatives." The purpose of the alternatives analysis is to determine whether or not a variation of the proposed LRCP would reduce or eliminate significant impacts within the basic framework of UC Hastings objectives.

5.2 ALTERNATIVES CONSIDERED AND REJECTED

Section 15126.6(c) of the CEQA Guidelines requires that an Environmental Impact Report (EIR) identify any alternatives that were considered by the Lead Agency, but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the Lead Agency's determination. Among factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts.

Section 15126.6(f)(2) of the CEQA Guidelines requires that an EIR consider alternative locations to the project site. The City of San Francisco is almost entirely built out, and there are few remaining undeveloped parcels left in the City. Development within San Francisco primarily occurs from the recycling of developed properties at a higher intensity of use, such as what would occur under the proposed LCRP. UC Hastings does not own or control any other sites in San Francisco. Further, redevelopment of similarly sized parcels in San Francisco would likely create the same impacts as the proposed LRCP, only those impacts would be shifted to the area immediately surrounding an alternative site. Development under the LRCP at an alternative site would not reduce or avoid any environmental impacts. Therefore, alternate locations to the existing UC Hastings campus were not considered for this EIR.

5.3 ALTERNATIVES ANALYSIS

Based on the environmental analysis conducted for the LRCP, significant impacts requiring mitigation have been identified related to air quality (exposure to sensitive receptors due to construction-related effects), noise (construction-related effects and mechanical equipment noise), cultural resources (construction-related impacts on historic resources and archeological resources), and wind (hazard impacts on surrounding sidewalks).

The EIR identifies less-than-significant impacts for aesthetics, geology and soils, greenhouse gas emissions, land use and planning, transportation, and shadow. The EIR did not identify any significant and unavoidable environmental impacts. Three alternatives have been carried forward for analysis in the EIR, including the "No Project" alternative, as required by CEQA. The alternatives in this section thus include the following:

- No Project/No Build Alternative
- 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative
- 198 McAllister Reduced Building Alternative

5.3.1 No Project/No Build Alternative

According to the CEQA Guidelines Section 15126.6(e)(3)(b), the No Project Alternative is defined as the "circumstance under which the proposed project does not proceed." The purpose of describing and analyzing the No Project Alternative is "to allow decision-makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." Under the No Project/No Build Alternative, the development under the proposed LRCP would not proceed and the UC Hasting campus would remain in its existing condition. No new structures would be constructed and no structures would be demolished. The academic and office building spaces, housing, and infrastructure would remain the same as the existing conditions.

5.3.2 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative

For the purpose of this alternatives discussion, the range of development—including gross square footage and the number of units under Variant B—encompasses those of Variant A, as Variant B would be a more expansive development. Therefore, this alternative discussion focuses on Variant B with 80-foot heights for the alternative projects evaluation.

Variant B would include the redevelopment of both sites with an expanded campus housing building, including academic support and/or retail space on the bottom levels.

Under the 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative, the new academic building at 333 Golden Gate Avenue would still be constructed, and 100 McAllister Street would still be renovated and reconfigured. This alternative would include demolition of the buildings at 198 McAllister and 50 Hyde Streets, and construction of new buildings up to 80 feet tall, compared to 140 feet under the proposed LRCP. The total gross floor area with the 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative would be 185,000 gross square feet (gsf), including 61,000 gsf of multipurpose space to replace existing 50 Hyde space and 3,300 gsf of retail/other space. The total housing unit count under this alternative would be 240 to 350 campus housing units. With 260 to 350 units at 100 McAllister Street, the 80-Foot Height for 198

McAllister and 50 Hyde Streets alternative would have a total of 500 to 700 campus housing units, compared to 660 to 1,120 units with the proposed LRCP.

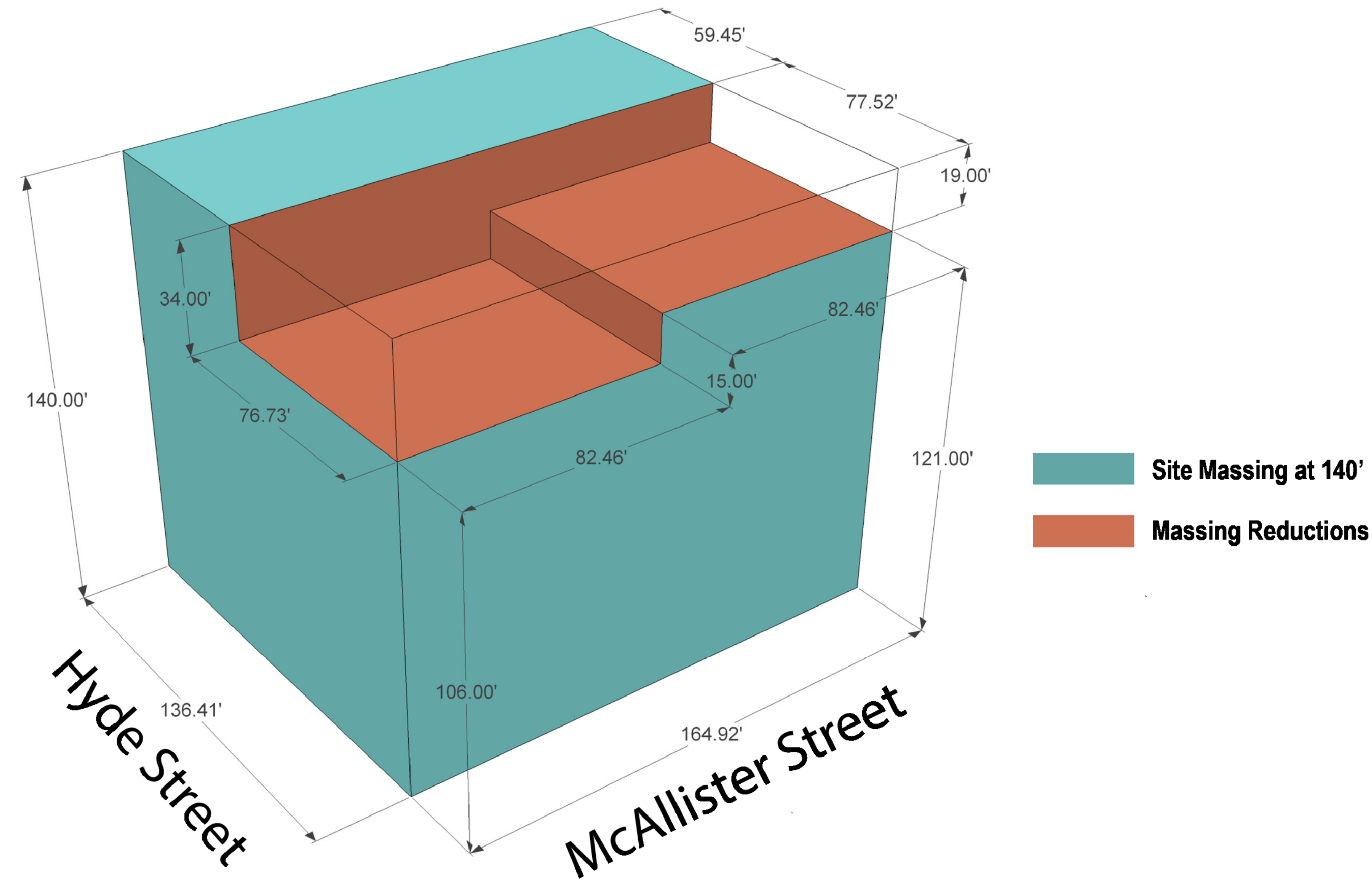
5.3.3 198 McAllister Reduced Building Alternative

Under the 198 McAllister Reduced Building Alternative, the new academic building at 333 Golden Gate Avenue would still be constructed, and the building at 100 McAllister Street would still be renovated and reconfigured. This alternative would include demolition of 198 McAllister Street and construction of an approximately 13-story, 140-foot-tall structure, with portions near the top of the building set back, or terraced, to create a reduction in the building envelope. The development of this building would also include the demolition of the existing 50 Hyde Street building, resulting in a development encompassing both sites. The new 198 McAllister Street building would be approximately 13 stories (140 feet) tall, 285,000 gsf, and would provide approximately 440 to 640 campus housing units (depending on unit size). This alternative would also demolish 50 Hyde Street, and would develop an approximately 102,000-gsf building with an additional approximately 125 to 170 housing units, depending upon the square footage of the average unit, including 61,000 gsf of multipurpose space, and 3,300 gsf of retail/other space. With this alternative, 50 Hyde Street development would be the same as Variant B, with a 140-foot building. With 260 to 350 units at 100 McAllister Street, the alternative would have an approximate total of approximately 700 to 990 campus housing units, compared to 660 to 1,120 units with the proposed LRCP. See Figure 5-1, 198 McAllister Street Alternative Massing, for the building massing for the 198 McAllister Reduced Building Alternative.

5.3.4 Overview of Alternative Impacts Compared to the LRCP

No Project/No Build Alternative

Under the No Project/No Build Alternative, the environmental characteristics would be the same as those described in the environmental setting sections of Chapter 4. Construction impacts related to air quality, noise, and cultural resources associated with the proposed LRCP would be avoided because no development would occur on the UC Hastings campus under the No Project/No Build Alternative. No existing structures would be demolished, and the existing uses on campus would continue to operate in their current capacity and function for UC Hastings. No modernization of 50 Hyde Street or renovation and reconfiguration of the Tower at 100 McAllister Street would occur under the alternative. Maintenance activities would occur as needed to maintain the existing facilities.



Source: PreVision Design

1/25/2016

FIGURE 5-1: 198 MCALLISTER STREET ALTERNATIVE MASSING

Operational impacts associated with aesthetics (glare from new structures), wind (hazardous conditions at the pedestrian level), shadow (new shadow cast on open space), and aesthetics (new and modified campus buildings) would be avoided because no changes to the UC Hastings campus would occur. The number of vehicles trips to/from the campus would be similar to the existing conditions. Thus, no substantial increase in mobile emissions or vehicular noise would be expected to occur. Further, this alternative would not achieve any of the objectives of the proposed LRCP.

Comparison of the Build Alternatives

Table 5-1, Alternative Impact Discussion and Comparison, provides a discussion of the two build alternatives (80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative and 198 McAllister Reduced Building Alternative) in comparison to the proposed LRCP.

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

An EIR is required to identify the environmentally superior alternative from a range of reasonable alternatives to the proposed project. This alternative would result in fewer significant unavoidable impacts and impacts requiring mitigation. Of the alternatives analyzed in this document, the No Project/No Build Alternative is considered the environmentally superior alternative, as it would avoid all of the potential environmental impacts related to the proposed project. However, the No Project/No Build Alternative would not meet any of the UC Hastings objectives for the LRCP. In accordance with Section 15126.6(e)(2) of the CEQA Guidelines, if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Of the two remaining alternatives, the 198 McAllister Reduced Building Alternative would be the environmentally superior alternative because it would allow for development that would contribute to satisfying the goals and objectives of the LRCP, while reducing impacts related to shadow and wind. However, development under this alternative would not fully meet UC Hastings and UCSF objectives.

Under the 198 McAllister Reduced Building Alternative, portions near the top of the proposed building would be set back, or terraced, creating a reduction in building massing. This overall reduction would eliminate shadows being cast on the northeast corner of Civic Center Plaza during the first approximately 39 minutes of the sunrise plus 1 hour period from May 18 to July 25. While this shadow effect was determined to be less than significant, as it would affect an area of the park with low public use, and for a limited time of day and year, this alternative would avoid the new shadow on Civic Center Plaza.

The alternative would also eliminate a new wind hazard criterion exceedance generated at the northwest corner of McAllister and Hyde Streets. Mitigation Measure-WI-1 would require wind-tunnel testing of detailed design of 198 McAllister Street, to identify and implement design features that would eliminate the wind hazard exceedance at this location, and would reduce this impact to a less-than-significant level.

Under this alternative, other potentially significant impacts relating to air quality would be generated; however, these impacts would be reduced to less-than-significant levels with implementation of mitigation similar to that described in this LRCP EIR for the proposed LRCP project.

Under this alternative, potentially significant construction-related noise and vibration impacts, similar to those with the proposed project, could be generated depending on necessary equipment and possible nighttime work. These impacts would be unmitigated, and therefore, would be significant and unavoidable.

Table 5-1: Alternative Impact Discussion and Comparison

Environmental Topic	Proposed LRCP	80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative	198 McAllister Reduced Building Alternative
Aesthetics	The LRCP would meet the criteria of Public Resources Code Section 21099(d). Aesthetics effects of projects on in-fill sites in a transit priority area shall not be considered significant and the discussion of Aesthetics is included in the EIR for informational purposes. LRCP development would contribute new sources of light and glare to the area, but would not be uncharacteristic of the dense urban environment. Future building design would be expected to have limited use of highly-reflective building materials. The impact would be less than significant.	Aesthetics impacts with this alternative would be similar to the proposed LRCP, because similar development would occur with reduced height of the buildings at 198 McAllister and 50 Hyde Streets. No impact would occur. Alternative LRCP development would contribute new sources of light and glare to the area, but would not be uncharacteristic of the dense urban environment. . Future building design would be expected to have limited use of highly-reflective building materials. The impact would be less than significant.	Aesthetics impacts under this alternative would be similar to the proposed LRCP because similar development would occur with reduced building massing at 198 McAllister Street. No impact would occur. Alternative LRCP development would contribute new sources of light and glare to the area, but would not be uncharacteristic of the dense urban environment. . Future building design would be expected to have limited use of highly-reflective building materials. The impact would be less than significant.
Air Quality	Development with the LRCP would not exceed BAAQMD significance thresholds. LRCP development would temporarily increase emissions in the project area from equipment use. However, emissions would not exceed BAAQMD significance thresholds, and impacts would be less than significant.	Construction and operational emissions with this alternative would be reduced compared to the proposed LRCP because the reduced height of the buildings at 198 McAllister and 50 Hyde Streets would require less construction activity and because it would include fewer housing units compared to Variants A and B. Transportation patterns of UC Hastings and UCSF students would be similar or slightly reduced. Impacts would be less than significant.	Construction and operational emissions with this alternative would be reduced compared to the proposed LRCP because the reduced massing at 198 McAllister would require less construction activity and because it would include fewer housing units compared to Variants A and B. Transportation patterns of UC Hastings and UCSF students would be similar or slightly reduced. Impacts would be less than significant.
Cultural Resources	198 McAllister Street and 50 Hyde Street, are not historic resources, and their demolition would not be an adverse effect. LRCP development would not impact any historic resources within the Civic Center historic districts or the Uptown Tenderloin Historic District, nor would it adversely affect the integrity of those historic districts. Renovation of 100 McAllister Street, a historic resource, would maintain the building's character-defining features. Construction vibration mitigation would avoid vibration impacts on adjacent historical resources. The impacts would be less than significant with mitigation. The LRCP would not disrupt any known archaeological resources. Mitigation measures would avoid adverse impacts if unanticipated subsurface archeological resources were discovered. The impact would be less than significant with mitigation.	Cultural resources impacts would be similar to the proposed LRCP, and development of the alternative would not impact any historic resources within the Civic Center historic districts or the Uptown Tenderloin Historic District, or the 100 McAllister Street building, an historic resource, Construction vibration mitigation would avoid vibration impacts on adjacent historical resources. The impact would be less than significant with mitigation. The alternative would not disrupt any known archeological resources. Mitigation measures would avoid adverse impacts if unanticipated subsurface archeological resources were discovered. The impact would be less than significant with mitigation.	Cultural resources impacts would be similar to the proposed LRCP, and development of the alternative would not impact any historic resources within the Civic Center historic districts or the Uptown Tenderloin Historic District, or the 100 McAllister Street building, a historic resource, Construction vibration mitigation would avoid vibration impacts on adjacent historical resources. The impact would be less than significant with mitigation. The alternative would not disrupt any known archeological resources. Mitigation measures would avoid adverse impacts if unanticipated subsurface archeological resources were discovered. The impact would be less than significant with mitigation.

Environmental Topic	Proposed LRCP	80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative	198 McAllister Reduced Building Alternative
Geology and Soils	The UC Hastings campus and vicinity is in an area with varying subsurface conditions, and in a region prone to seismic events. A geotechnical investigation was completed for the 333 Golden Gate Avenue site which determined that while shallow soils underlying potential LRCP development sites consist mostly of fill material, deeper soils consist of stable compositions appropriate for foundations and have low liquefaction or expansion potential. Excavation would be anticipated to remove fill material, reaching stable soils. Rupture of known faults in the region would cause seismic related ground shaking, LRCP development would incorporate California Building Code requirements regarding seismic safety. The impact would be less than significant.	Geology and Soils impacts under this alternative would be similar to the proposed LRCP because similar development would occur with reduced height of the buildings at 198 McAllister and 50 Hyde Streets encountering the same subsurface conditions. Excavations and foundations would be anticipated to be similar to the proposed LRCP. Impacts would be less than significant.	Geology and Soils impacts under this alternative would be similar to the proposed LRCP because development would encounter the same subsurface conditions. Excavations and foundations would be anticipated to be similar to the proposed LRCP. Impacts would be less than significant.
Greenhouse Gas Emissions	The LRCP would not contribute GHG emissions above regional significance thresholds established by the BAAQMD. LRCP development would generate incremental increases in GHG emissions with expansion of campus facilities; however, increases would be below significance thresholds, and impacts would be less than significant.	GHG emissions with this alternative would be slightly less than those generated by the proposed LRCP, as a reduced building height and number of units would generate a lower energy consumption demand. However, emissions would still be below BAAQMD regional significance thresholds, and impacts would be less than significant.	GHG emissions with this alternative would be similar to those with the proposed LRCP. Development with this alternative would have a similar building massing and footprint as with the proposed LRCP, and would have a similar energy consumption demand. Impacts would be less than significant.
Land Use and Planning	No state-level plans have immediate influence over the LRCP area. LRCP development would be consistent with existing uses on the campus, and would not expand campus boundaries. As a state entity, UC Hastings is not subject to San Francisco Planning Code requirements. The 140-foot building heights with LRCP developments would exceed Planning Code 80-foot height limits. The impact would be less than significant.	As a state entity, UC Hastings is not subject to San Francisco Planning Code requirements. The 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative would be consistent with San Francisco Planning Code height limits for UC Hastings sites. The impact would be less than significant	Land use impacts under this alternative would be similar to the proposed LRCP, As a state entity, UC Hastings is not subject to San Francisco Planning Code requirements. The 140-foot building heights with LRCP development would exceed the Planning Code 80-foot height limits. The impact would be less than significant.
Noise	The development of new buildings under the LRCP could involve a range of construction techniques that, depending on specific site conditions or engineering needs, could potentially require nighttime construction, or use of equipment that could create vibration impacts. While those activities may be limited in duration, the nighttime noise and vibration effects would be reduced but not avoided with mitigation measures, and would be significant unavoidable environmental impacts.	Construction noise generated under this alternative would be similar to the proposed LRCP, and could involve construction techniques and equipment that could potentially require nighttime construction, or use of equipment that could create vibration impacts. While these activities may be limited in duration, the nighttime noise and vibration effects would be reduced but not avoided with mitigation measures, and would be significant unavoidable environmental impacts.	Construction noise generated under this alternative would be similar to the proposed LRCP; and could involve construction techniques and equipment that could potentially exceed EPA thresholds, require nighttime construction, or require use of equipment that could create vibration impacts. While these activities may be limited in duration, the nighttime noise and vibration effects would not be avoided with mitigation measures, and would be significant unavoidable environmental impacts.
Transportation	Under SB 743, parking impacts of projects proposed in a transit priority area, such as the LRCP, are not considered significant under CEQA, and are included for information. The UC Hastings campus is located in a transit priority area, with all modes of private and public transportation available. The transportation analysis determined that LRCP development would have less-than-significant impacts on vehicle traffic and intersection operations, transit capacity, pedestrian and bicycle facilities, loading conditions, and emergency access.	Similar or slightly reduced transportation impacts would occur under this alternative to the proposed LRCP because similar development would occur with a reduced number of student housing units at 198 McAllister and 50 Hyde Streets, generating a slightly reduced number of trips to and from the campus. Transportation impacts would be less than significant.	Similar or slightly reduced transportation impacts would occur under this alternative to the proposed LRCP because similar development would occur with a reduced number of student housing units at 198 McAllister and 50 Hyde Streets, generating a slightly reduced number of trips to and from the campus. Transportation impacts would be less than significant.

Environmental Topic	Proposed LRCP	80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative	198 McAllister Reduced Building Alternative
Shadow	LRCP development at 198 McAllister Street would add shade to Civic Center Plaza, a Recreation and Park Department open space. The new shade would occur during early morning periods of low use of Civic Center Plaza, and would not affect the children's playgrounds. The LRCP would not create new shade that would substantially affect outdoor recreation uses at Civic Center Plaza, and the shadow impact would be less than significant.	The 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative would not add shade to Civic Center Plaza in early morning periods. Impacts would be less than significant. As a state entity, UC Hastings is not subject to San Francisco Planning Code requirements; however, this alternative would be consistent with Planning Code criteria to avoid shadow impacts on Recreation and Park Department open space.	The 198 McAllister Reduced Building Alternative would not add shade to Civic Center Plaza in early morning periods. Impacts would be less than significant. As a state entity, UC Hastings is not subject to San Francisco Planning Code requirements; however, this alternative would be consistent with Planning Code criteria to avoid shadow impacts on Recreation and Park Department open space.
Wind	LRCP development at 198 McAllister Street would generate a single new wind hazard exceedance at the northwest corner of McAllister and Hyde Streets that would exceed the criteria threshold by 1 mile-per-hour for a total of approximately 2 hours per year. A mitigation measure would require wind-tunnel testing of detailed design of 198 McAllister Street, to identify design features that would eliminate this wind hazard exceedance, and would reduce this impact to a less than significant level.	The 80-Foot Height for 198 McAllister and 50 Hyde Streets Alternative would not create any new wind hazard exceedances. No hazardous conditions would occur. The impact would be less than significant.	The 198 McAllister Reduced Building Alternative would not create any new wind hazard exceedances No hazardous conditions would occur. The impact would be less than significant.

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6. OTHER CEQA CONSIDERATIONS

This chapter provides an overview of the impacts of the proposed Long Range Campus Plan (LRCP) based on the analyses presented in Chapters 4 and 5 of this Draft Environmental Impact Report (EIR). The topics covered in this chapter include environmental effects found to be not significant, growth inducement, unavoidable significant impacts, and significant irreversible changes, as required under Sections 15128 and 15126 of the California Environmental Quality Act (CEQA) Guidelines.

6.1 ENVIRONMENTAL EFFECTS FOUND TO BE NOT SIGNIFICANT

Sections 15128 and 15143 of the CEQA Guidelines require the identification of impacts of a project that were determined not to be significant and that were not discussed in detail in the impact section of the EIR. For this project, it was determined that significant impacts would not occur in the following resource categories: Agriculture and Forest Resources, Biological Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, Mineral and Energy Resources, Population and Housing, Public Services, Recreation, and Utilities and Service Systems. The Initial Study outlines the reasons why these effects were found to be not significant (see Appendix A).

6.2 UNAVOIDABLE SIGNIFICANT IMPACTS

In accordance with Section 21100(b)(2)(A) of CEQA and Section 15126.2(b) of the State CEQA Guidelines, the purpose of this section is to identify environmental impacts that could not be eliminated or reduced to a less-than-significant level by mitigation measures included as part of the proposed LRCP, if the LRCP was implemented. As detailed in Chapter 4, Environmental Evaluation, environmental impacts associated with potential noise and vibration during proposed LRCP construction periods would be significant and unavoidable.

Certain LRCP construction activities may be necessary between 8:00 p.m. and 7:00 a.m. Occupants at nearby residences and hotels would be sensitive to increased nighttime noise. Mitigation Measure (MM)-NO-1, Noise Reduction Plan, would help control exposure to nighttime noise. Due to lower ambient noise levels at nighttime than daytime, it is anticipated that nighttime construction noise would be audible and would interfere with sleep activity at residences and hotels. Nighttime construction activity that would exceed ambient noise levels at the property line of the site by 5 dBA, and would result in a significant and unavoidable impact despite the implementation of MM-NO-1.

LRCP construction activity adjacent to residences could generate vibration levels that exceed the annoyance threshold. MM-NO-3, Construction Vibration Reduction, would help reduce exposure to vibration. However, nighttime construction vibration that would exceed 80 VdB at residential land uses would result in a significant and unavoidable impact despite the implementation of MM-NO-3.

6.3 Significant Irreversible Environmental Changes

Section 15126.2(c) of the CEQA Guidelines requires that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations will not be able to reverse.

Construction and operation of the development under the LRCP would result in the use of nonrenewable resources, including fossil fuels, natural gas, and water, and building materials such as lumber, concrete, and steel. However, development under the LRCP is not anticipated to consume substantial amounts of energy in a wasteful manner, and it is unlikely to result in significant impacts as a result of consumption of utilities that would not be expected in an urban area, especially for redevelopment projects. Operation of new development under the LRCP would require the use of nonrenewable resources for electricity that would result in an irreversible or irretrievable commitment of resources. However, the small amounts of resources consumed during operation of the development would be considered normal for San Francisco. Although irreversible environmental changes would result from the implementation of the LRCP, such changes would not be considered significant.

6.4 Growth-Inducing Impacts

Section 15126.2(d) of the State CEQA Guidelines requires an EIR to discuss growth-inducing impacts of the project. Growth-inducing impacts are those effects that could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to CEQA, increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the implementation of a project. Typically, a project's potential for growth inducement would be considered significant if it would result in growth or population concentrations exceeding those assumptions included in pertinent master plans, land use plans, or projections made by regional planning authorities. However, creating the potential for growth inducement does not automatically lead to growth, whether it would be below or exceeding a projected level. The environmental effects of induced growth are secondary or indirect impacts of a project. Secondary effects of growth could result in significant adverse environmental impacts, which could include increased demand on community or public services that exceed currently available and planned capacity, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses.

Growth inducement under CEQA considers the ways in which the proposed and foreseeable activities of a project could encourage and facilitate other activities that would induce economic or population growth, either directly or indirectly. Examples of projects likely to have growth-inducing effects include expansions of infrastructure systems beyond what is needed to serve existing demand in the project area, and development of new residential uses in areas that were only sparsely developed or undeveloped.

Development under the LRCP would involve demolition and construction activities that could generate temporary construction jobs. Because the construction would not have unusual labor requirements (i.e., requiring specialized labor skills), worker recruitment would be expected to be filled from the local labor market in the Bay Area, without attracting construction labor from areas beyond the region. Because the number of workers with applicable skills would be from the local labor market, it would be unlikely that a substantial number of construction workers would need to relocate to work on development under the LRCP. Thus, implementation of the LRCP would not be considered growth inducing from a short-term employment perspective.

The Initial Study, Section 5.13, Population and Housing, found that development under the LRCP would accommodate existing housing demand, and would not require extension or expansion of public services or utilities.

For the previously described reasons, implementation of the LRCP would not result in substantial additional population and employment growth in the surrounding neighborhood or citywide, and thus, the LRCP would not result in direct or indirect substantial growth inducement.

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Appendix A
Initial Study

Initial Study

Long Range Campus Plan

University of California
Hastings College of the Law

December 14, 2015

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1. PROJECT INFORMATION

1.1 PROJECT TITLE

University of California Hastings College of the Law (UC Hastings or the College) Long Range Campus Plan

1.2 LEAD AGENCY NAME AND ADDRESS

University of California Hastings College of the Law
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San Francisco, California 94102

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1.3 RESPONSIBLE AGENCY NAME AND ADDRESS

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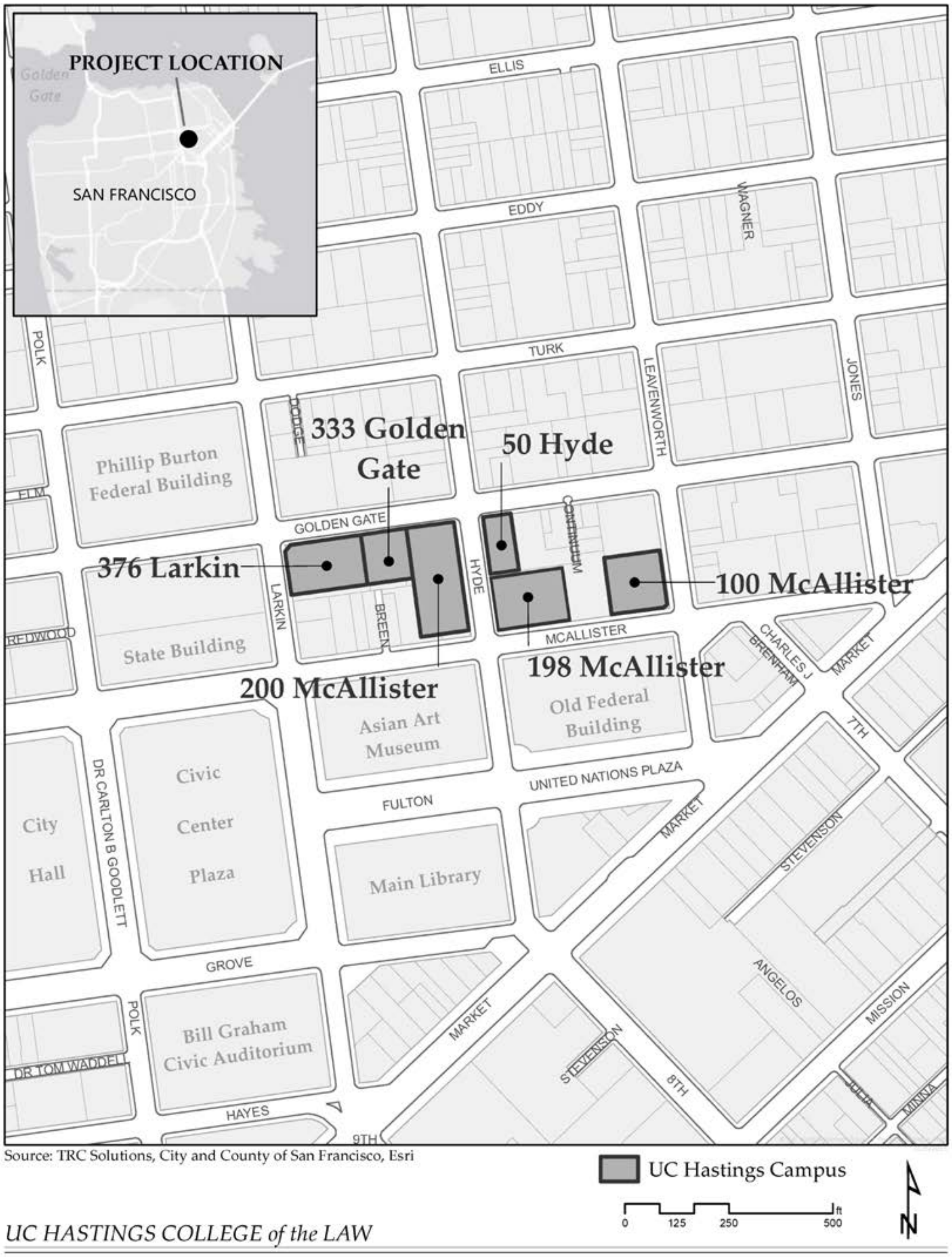
San Francisco, California 94143

1.4 PROJECT SPONSOR NAME AND ADDRESS

University of California Hastings College of the Law
200 McAllister Street
San Francisco, California 94102

1.5 PROJECT LOCATION

UC Hastings occupies five buildings and owns one vacant lot on the two blocks bounded by Golden Gate Avenue, Larkin Street, McAllister Street, Hyde Street, and Leavenworth Street, one block north of the San Francisco Civic Center (see Figure 1, Project Location).



UC HASTINGS COLLEGE of the LAW

Long Range Campus Plan

FIGURE 1: PROJECT LOCATION

2. PROJECT DESCRIPTION

2.1 INTRODUCTION

The University of California Hastings College of the Law (UC Hastings or the College) was founded in 1878 as the first law department of the University of California, and is the oldest public law school in California. Founded by California Chief Justice Serranus Clinton Hastings, UC Hastings was established by the California Legislature with its own Board of Directors, which operates the College independently of the Board of Regents of the University of California. UC Hastings is the only standalone public law school in the nation.

Since its founding, UC Hastings has been an integral part of the fabric of the City and County of San Francisco. It is strategically located at the intersection of three distinct neighborhoods: (1) Civic Center, where the Supreme, Appellate, and Superior courts of California are located along with the federal District Court and 9th Circuit Court of Appeal and amidst city, state and federal office buildings, as well as San Francisco's major cultural institutions; (2) Mid-Market, where a growing concentration of technology firms, including Twitter, Zendesk, Uber, Square, and many others, are located; and (3) the Tenderloin, a densely populated, primarily residential neighborhood with a diverse population composed of multiple ethnicities and a broad demographic.

The strategic location of UC Hastings is emblematic of its mission to unite the theory and the practice of law by providing an academic program of the highest quality—based upon scholarship, teaching, and research—to a diverse student body, and to assure that its graduates have a comprehensive understanding and appreciation of the law, and are well-trained for the multiplicity of roles they will play in a society and profession that are subject to continually changing demands and needs.

Societal and economic change is evident in the community surrounding UC Hastings. Business development in the Mid-Market area and the nascent renewal of the Tenderloin, supported by the steadfastness of the stakeholder institutions of the Civic Center, provide a perfect backdrop for UC Hastings to revitalize its campus to meet the needs of future generations of law students and promote the revitalization of the area for students, workers, and residents alike.

As of 2015, UC Hastings hosts approximately 933 full-time Juris Doctor, Master of Law, and Master of Studies in Law students within its comprehensive academic programs, and extensive and innovative experiential learning and judicial externship programs.

The UC Hastings faculty of approximately 69 full-time and 81 part-time and adjunct faculty members includes a full roster of eminent scholars and professional leaders from a wide range of disciplines, who embody the College's ethos by turning knowledge into action and helping students do the same.

The UC Hastings campus currently consists of five buildings located at 100, 198, and 200 McAllister Street, 50 Hyde Street, and 376 Larkin Street (the UC Hastings Parking Garage), and a vacant lot at 333 Golden Gate Avenue, all of which are on two contiguous blocks between Larkin and Leavenworth Streets, and Golden Gate Avenue and McAllister Street.

The existing facilities are described as follows:

- 100 McAllister Street (Block 0348/Lot 006), known as the Tower, is a 27-story, 249,000-gross-square-foot (gsf) structure constructed in 1929; it serves as student housing, with 252 units and recreational facilities. The 11,000-sf Great Hall, which was originally used as a cathedral and is currently vacant, is within the Tower. The Tower's educational and research functions currently utilize approximately 20,000 gsf of the building.
- 198 McAllister Street (Block 0348/Lot 009), known as Snodgrass Hall, is a four-story, 76,000-gsf structure constructed in 1953; it serves as the primary academic facility of UC Hastings, housing the majority of the College's lecture halls and seminar rooms, along with 80 offices.
- 50 Hyde Street (Block 0348/Lot 014), known as the Snodgrass Hall Annex, is a four-story, 61,000-gsf structure constructed in 1969 and is immediately adjacent to Snodgrass Hall; it consists of four classrooms, the Marvin and Jane Baxter Appellate Law Center, Moot Court, the Gold Reading Room, and the large Louis B. Mayer multi-purpose hall.
- 200 McAllister Street (Block 0347/Lot 003), known as Mary Kay Kane Hall, is a six-story, 177,000-gsf structure that was constructed in 1980 and renovated in 2007; it houses many UC Hastings faculty and administrative offices, the library, cafeteria, faculty lounge, and various student support facilities.
- The UC Hastings Parking Garage, at 376 Larkin Street (Block 0347/Lot 016), is a seven-story, 157,000-gsf structure constructed in 2009; it provides 395 parking spaces to meet student, faculty, staff, and public parking needs, and houses 13,000 sf of retail space.
- The vacant lot at 333 Golden Gate Avenue (Block 0347/Lot 017) measures 11,962 sf and is currently used as a recreational area by UC Hastings students and for demonstration urban gardening.

Table 1 includes a summary of existing UC Hastings facilities.

Table 1: Existing UC Hastings Facilities

Building	Land Area (sf)	Building (gsf)	Housing Units	No. of Floors	Primary Program
100 McAllister Street	19,000	249,000	252	27 (+ basement)	Residential
198 McAllister Street	23,000	76,000	-	4 (+ 3 mezzanine)	Academic
50 Hyde Street	9,000	61,000	-	4	Academic/Multipurpose
200 McAllister Street	42,000	177,000	-	6	Academic/Office
376 Larkin Street	26,000	157,000	-	7 (+basement)	Parking
333 Golden Gate Avenue	12,000	0	-	n/a	n/a
Total	**131,000**	**720,000**	252	-	-
Source: UC Hastings. 2015. *Five Year Infrastructure Plan 2016–2021*; 2015. *Five Year Institutional Master Plan.*					

2.2 LONG RANGE CAMPUS PLAN

To complement the dynamic renaissance of Mid-Market and the changing face of the Tenderloin, UC Hastings is focusing its Long Range Campus Plan (LRCP) on strategically enhancing its infrastructure to support an innovative approach to legal education, focusing on practical skill and experiential learning to ensure that its law students are well equipped to enter the modern legal marketplace.

The UC Hastings LRCP, incorporating the findings and capital proposals of the Five Year Infrastructure Plan 2016–2021, identifies the primary focus of the College's efforts in recent years as a systematic effort to achieve campus-wide, code-compliance, and fire/life-safety objectives, as well as other space improvements to enhance campus life for students, faculty, and staff. [1]

The Five Year Infrastructure Plan 2016–2021, proposed the following five major infrastructure projects, which are further detailed in Table 2:

1. Constructing a new, approximately 57,000-gsf academic building on the vacant lot at 333 Golden Gate Avenue
2. Demolishing Snodgrass Hall at 198 McAllister Street and constructing a new campus housing building in its place
3. Modernizing 50 Hyde Street; planning options include the possibility of incorporating the academic functionality of 50 Hyde Street into the lower levels of a campus housing complex on the combined 198 McAllister Street and 50 Hyde Street sites
4. Renovating and reconfiguring the Tower at 100 McAllister Street
5. Renovating and reusing the Great Hall at 100 McAllister Street

[1] UC Hastings. 2015. *Five Year Infrastructure Plan 2016–2021.* September.

Table 2: Long Range Campus Plan Projects

Building	Building (gsf)	Housing Units	Floors	Primary Program
100 McAllister Street	249,000	260–350	27	Residential
198 McAllister Street/50 Hyde Street				
Residential Variant A[1]	227,000	400–600	13	Residential/Multipurpose
Residential Variant B[2]	329,000	525–770	13	Residential/Multipurpose
200 McAllister Street[3]	177,000	-	6	Academic/Office
376 Larkin Street[3]	157,000	-	7	Parking
333 Golden Gate Avenue	57,000	-	8	Academic/Office
Total	**867,000–969,000**	**660–1,120[4]**	-	-

Note:
1 This variant includes renovation of the existing building at 50 Hyde Street and continuance of its current uses (academic/multipurpose).
2 This variant includes demolition of the existing building at 50 Hyde Street and development of the site into campus housing. The existing academic functions housed at 50 Hyde Street would be replicated in the lower floors of a new student housing facility. The total number of units shown includes those that would be constructed as part of Residential Variant A, with an additional 125–170 units that would be constructed with Residential Variant B.
3 LRCP projects conducted at this site would not result in changes to building square footage, units, floors, or programming.
4 The total number of housing units includes 252 existing units at 100 McAllister Street.

Source: UC Hastings. September 2015. *Five Year Infrastructure Plan 2016–2021*; December 2015. *Five Year Institutional Master Plan.*

2.2.1 New Academic Building at 333 Golden Gate Avenue

To support the educational and infrastructure goals of UC Hastings, California Governor Edmund G. Brown recently approved the Budget Act of 2015, which appropriated $36.8 million of lease revenue bond financing to construct a new academic building on the vacant lot at 333 Golden Gate Avenue. [2] As discussed further in Section 2.5.1, the State Department of General Services (DGS) will oversee design and development of 333 Golden Gate Avenue through a design-build process.

It is anticipated that the new academic building at 333 Golden Gate Avenue would be approximately 57,000 gsf and would be approximately 80 feet tall. However, to allow for design and engineering changes, an additional 10 feet in building height, or approximately 90 feet in total height, will be analyzed. The building would replace all academic programming and faculty offices currently in Snodgrass Hall at 198 McAllister Street. The building would provide a more cohesive campus and enable UC Hastings to create state-of-the-art classroom facilities that would serve the College for decades. With a smaller footprint than Snodgrass Hall, the new

2 The College reviewed the cost effectiveness of renovating 198 McAllister Street. The 198 McAllister Street building is one of the College's least efficient facilities in terms of energy usage and programmatic layout. The building's inefficient and aging building systems and its confused layout contribute to making it three times less efficient—in terms of annual operating costs—than the 200 McAllister Street building completed in 1980. *The Engineering Enterprise and Taylor Engineering. 2011. UC Hastings College of the Law MEP Due Diligence Report, 198 McAllister St, San Francisco.*

academic building would benefit from efficient space planning that corresponds with the College's implementation of a reduction in enrollment of 20 to 25 percent to better align the school's population to the needs of the legal marketplace it serves, ensure a better learning environment for its students, and increase opportunities for employment after graduation.

Construction at 333 Golden Gate Avenue is projected to be completed by 2020, with the commencement of instructional operations beginning in the fall 2020 semester.

2.2.2 Demolish Snodgrass Hall and Construct Student Housing at 198 McAllister Street

Upon completion of the new academic building at 333 Golden Gate Avenue, Snodgrass Hall would be demolished to allow for construction of an approximately 13-story, 140-foot-tall (as measured from McAllister Street; 130-foot-tall as measured from Golden Gate Avenue), 227,000-gsf building that would provide approximately 400 to 600 housing units, depending upon the square footage of the average unit; approximately 15,000 sf of non-revenue-generating College-serving academic and instructional uses, and/or revenue-generating third-party retail uses on the ground floor to provide student amenities and to activate the street level. Common open space and recreational services would be included for UC Hastings students and staff.

Demolition and development at 198 McAllister Street would occur after 2020 occupancy of 333 Golden Gate Avenue.

2.2.3 Modernize 50 Hyde Street/Demolish and Replace with Student Housing and Academic/Support Space

With the proposed demolition of Snodgrass Hall at 198 McAllister Street, 50 Hyde Street would require major HVAC and other building systems renovation and modernization to maintain important College functions, including the Louis B. Mayer Auditorium, Gold Reading Room, and Moot Court. Further, many of the building systems at 198 McAllister Street that support 50 Hyde Street would need to be replaced when the former building is demolished. Recognizing the need to modernize 50 Hyde Street, the Governor's 2015 Five Year Infrastructure Plan indicated future state support of an additional $6.8 million to modernize the building.

An alternative to modernizing 50 Hyde Street would demolish the building to create an enlarged development site that would allow for a greater increase in campus housing. Extending the proposed approximately 13-story, 140-foot-tall structure at 198 McAllister Street to the site of 50 Hyde Street would increase its size to approximately 329,000 gsf and would allow for an additional approximately 125 to 170 housing units, depending upon the square footage of the average unit; approximately 61,000 sf would be dedicated to academic, administrative, assembly, faculty, and multipurpose/support space on the ground and second floors to replace the existing 50 Hyde Street facilities. Common open space and recreational services would be included for UC Hastings students and staff.

Demolition and development at 50 Hyde Street would occur after 2020 occupancy of 333 Golden Gate Avenue.

2.2.4 Renovate and Reconfigure the Tower at 100 McAllister Street/Renovate and Reuse the Great Hall

Constructed in 1929, 100 McAllister Street (the Tower) would benefit from seismic strengthening and general building interior upgrade and modernization. The building currently contains 252 units of housing accommodating approximately 280 residents. The development of new housing at 198 McAllister Street would allow UC Hastings to continue providing student housing for its students while 100 McAllister Street is renovated.

UC Hastings has conducted extensive reviews of various redevelopment scenarios for the Tower. One scenario would renovate the unfinished space on the 25th and 26th floors of the Tower as additional housing units, with an average unit size of 390 sf. This would increase the total number of housing units from 252 to approximately 260 units. Another scenario would redevelop all existing housing units into an average unit size of 275 sf, which would increase the total number of housing units to approximately 350.

The Tower also includes approximately 36,000 sf of office space dedicated to research, clinical, and fiscal and communications functions, as well as the College's nine law journals. UC Hastings currently plans to relocate the research centers and clinics to the 200 McAllister Street building to use space more efficiently and create additional sources of revenue at the 100 McAllister Street building in the released space. Upon the renovation of 100 McAllister Street, the majority of these office uses would be preserved for UC Hastings or other compatible tenancies, with the exception of the space on the 22nd and 23rd floors currently occupied by the law journals, which may be converted back to residential use.

UC Hastings is currently analyzing the best use for the renovation and reuse of the approximately 9,200-gsf Great Hall, a space complemented by ceiling heights of 70 feet.

Assuming that the new academic building at 333 Golden Gate Avenue is complete by 2020, work at 100 McAllister Street would commence upon the projected completion of the new student housing facility at 198 McAllister Street in 2022, or sometime in 2024 or 2025 depending on schedule attainment of other projects in the sequential development queue.

2.2.5 Partnership with University of California San Francisco

New student housing at UC Hastings may be jointly developed with the University of California San Francisco (UCSF). To further enhance and strengthen its relationship with

UCSF and the broader University of California System, in December 2015, UC Hastings entered into a Letter of Intent with UCSF for the development of campus housing at UC Hastings to accommodate the academic and housing needs of UC Hastings and UCSF under their shared affiliation with the University of California System. Shared campus housing would be a natural extension of the existing collaboration between UC Hastings and UCSF on a successful consortium on law, science, and health policy for medical students and law students. Further, UC Hastings and UCSF are studying other partnerships that would include, but not be limited to, police services and student health centers, supplementing existing shared services with between the sister organizations.

2.3 PURPOSE OF AN INITIAL STUDY

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15063, an Initial Study is a preliminary environmental analysis that may be used by the Lead Agency to focus an Environmental Impact Report (EIR) on potentially significant environmental effects that may result from a proposed project. Accordingly, the purpose of this Initial Study is to analyze the LRCP and individually proposed projects to identify environmental impacts that are potentially significant, and therefore, require detailed study in the EIR. Potential environmental impacts determined to be less than significant require no further study in the EIR.

The CEQA Guidelines require that an Initial Study contain a project description, a description of environmental setting, an identification of environmental effects by checklist or other similar form, an explanation of environmental effects, a discussion of mitigation for significant environmental effects, an evaluation of the project's consistency with existing and applicable land use controls, and the names of the persons who prepared the study.

2.4 PROGRAM- AND PROJECT-LEVEL ANALYSIS

Pursuant to CEQA, a program EIR is prepared on a series of actions that can be characterized as one large project, such as for the UC Hastings LRCP. A program EIR generally establishes a framework for tiered or project-level environmental documents that are prepared in accordance with the overall program (see CEQA Guidelines Section 15168 [a]). An LRCP is defined by statute (Public Resources Code Section 21080.09) as a "physical development and land use plan to meet the academic and institutional objectives for a particular campus or medical center of public higher education." UC Hastings will prepare an EIR, as required by Public Resources Code Section 21080.09, which will evaluate the environmental effects of growth under the proposed LRCP. The LRCP EIR will be a program EIR that will be used by the UC Hastings Board of Directors to evaluate the environmental implications of adopting the proposed LRCP. Once certified, the EIR will also be used to tier subsequent environmental analyses for future UC Hastings development projects (CEQA Guidelines Section 15152).

Proposed UC Hastings development projects would then be reviewed in light of the LRCP EIR and CEQA Guidelines Sections 15162 and 15168(c), to determine whether the project's effects would require further environmental review. If UC Hastings finds that no new effects would occur and no new mitigation measures would be required, UC Hastings could approve the project as being within the scope of the LRCP EIR, under Guidelines Section 151628(c)(2). If the later project could have effects not identified in the LRCP EIR, UC Hastings could prepare a Supplement to the LRCP EIR, under Guidelines Section 15163, or an Addendum to the LRCP EIR, under Guidelines Section 15164.

The program-level analysis of proposed campus changes with the new LRCP in the EIR may analyze a number of specific and foreseeable development proposals. These proposals would be analyzed in the EIR in sufficient detail to permit project approval and implementation following certification of the EIR, as discussed previously. UC Hastings anticipates proceeding with some LRCP projects in the near term, within several years of EIR certification, while others would occur at a later date and are included at the program level in the EIR. Future projects would proceed when funding becomes available and project implementation is logistically feasible. Proposed projects are discussed in Section 2.2, Long Range Campus Plan.

2.5 CEQA Analysis of Long Range Campus Plan Projects

2.5.1 333 Golden Gate Avenue Construction

The new building at 333 Golden Gate Avenue would replace the College's existing primary academic facilities. Construction at 333 Golden Gate Avenue is projected to be completed by 2020, with the commencement of instructional operations beginning in the fall 2020 semester.

As noted previously, DGS will oversee the development of 333 Golden Gate Avenue through a design-build process. DGS would develop design guidelines and performance criteria in 2016, which would be subsequently approved by the State Department of Finance and State Public Works Board. After a Request for Qualifications process, three finalist design-build teams would be in a design competition through early 2017. The design-build phase with the selected team would then occur from mid-2017 to 2020, with occupancy by 2020.

Therefore, as discussed previously under Section 2.4, Program- and Project-Level Analysis, this Initial Study and the LRCP EIR will analyze the effects of 333 Golden Gate Avenue at a program level of detail.

2.5.2 Potential Residential Variant A – New Student Housing Development at 198 McAllister Street/Renovation of 50 Hyde Street

Upon the completion of the replacement academic building at 333 Golden Gate Avenue, the LRCP calls for demolition of the existing 198 McAllister Street building and development of the site as a housing facility. The new building would be approximately 13 stories (140 feet) tall, 227,000 gsf, and would provide approximately 400 to 600 campus housing units (depending on unit size), with approximately 15,000 sf of non-revenue-generating College-serving academic and instructional uses and/or revenue-generating third-party retail uses on the ground floor to provide student amenities and to activate the street level.

This scenario is referred to hereinafter as Residential Variant A. No detailed design for 198 McAllister Street has been developed. Therefore, as discussed previously under Section 2.4, Program- and Project-Level Analysis, this Initial Study and the LRCP EIR will analyze the effects of Residential Variant A at a program level of detail.

The renovation-only option for 50 Hyde Street would be considered exempt from CEQA under CEQA Guidelines Section 15301, Maintenance of Existing Facilities, and will not be addressed further.

2.5.3 Potential Residential Variant B – New Student Housing Development at 198 McAllister Street and 50 Hyde Street

As with Potential Residential Variant A, Residential Variant B would include development of the 198 McAllister Street site as a student housing facility, with approximately 400 to 600 housing units (depending on unit size) and ground-floor commercial or retail space and/or UC Hastings facilities. Residential Variant B would also demolish the 50 Hyde Street Annex, and would develop approximately 102,000 gsf with an additional approximately 125 to 170 housing units, depending upon the square footage of the average unit, and approximately 61,000 sf dedicated to academic, administrative, assembly, faculty, and multipurpose/support space on the ground and second floors to replace space formerly in the demolished 50 Hyde Street Annex.

Residential Variant B would include approximately of 329,000 gsf, with 525 to 770 campus housing units, and approximately 64,000 gsf of retail, academic, administrative, assembly, faculty, and multipurpose/support space.

No detailed design for Residential Variant B has been developed. Therefore, as discussed previously under Section 2.4, Program- and Project-Level Analysis, this Initial Study and the LRCP EIR will analyze Residential Variant B effects at a program level of detail.

2.5.4 100 McAllister Street Renovations

Renovation of 100 McAllister Street would repurpose unfinished space on the 25th and 26th floors as additional housing units, to increase the total number of housing units from 252 to 260. Another scenario would repurpose unfinished space on the 25th and 26th floors and redevelop all existing housing units into an average unit size of 275 sf to increase the total number of housing units to 350. As noted previously, some of the lower floors of the Tower also house approximately 36,000 sf of research, clinic, and fiscal and communications office space. UC

Hastings currently plans to relocate the research centers and clinics to the 200 McAllister Street building to utilize space more efficiently and create additional sources of revenue at the 100 McAllister Street building with the released space.

UC Hastings is currently analyzing the best option for renovation and reuse of the Great Hall.

The LRCP EIR will analyze the effects of the renovation of 100 McAllister Street at a program level of detail.

2.6 SURROUNDING LAND USES AND ENVIRONMENTAL SETTING

UC Hastings occupies five buildings and owns one vacant lot on the two blocks bounded by Golden Gate Avenue, Larkin Street, McAllister Street, Hyde Street, and Leavenworth Street, one block north of the San Francisco Civic Center (see Figure 1, Project Location).

The areas northeast and northwest of the campus include residential, commercial, and office uses (often with ground floor retail). Areas to the south include numerous civic uses, primarily associated with the Civic Center, including cultural, institutional, and educational uses owned by various local, state, and federal agencies.

In particular, the southwestern portion of the McAllister-Larkin-Golden Gate-Hyde block—which is adjacent to the UC Hastings Parking Garage at 376 Larkin Street and Mary Kay Kane Hall at 200 McAllister Street—is occupied by older apartment structures, many with ground-floor retail uses. The northern portion of the McAllister-Hyde-Golden Gate-Leavenworth block fronting Golden Gate Avenue and Leavenworth Street—which is adjacent to Snodgrass Hall and 100 McAllister Street—is occupied by a newer residential structure and older commercial structures. Mixed-use buildings are on the McAllister frontage between the UC Hastings buildings.

Many of the properties in these areas consist of older, four- to six-story apartment buildings with ground floor commercial uses. The six-story, 80-foot-tall California State Building at 350 McAllister Street is west of the campus, and is connected to the 14-story, 200-foot-tall State Office Building at 455 Golden Gate Avenue.

The 20-story, 300-foot-tall Philip Burton Federal Building at 450 Golden Gate Avenue is northwest of the project site. The old Federal Office Building at 50 United Nations Plaza is immediately south of the UC Hastings buildings located at 100 and 198 McAllister Street.

The Civic Center area includes the city-designated Civic Center Historic District, the federally designated Civic Center National Register Historic District, the Civic Center National Register Landmark District, and the Uptown Tenderloin National Register Historic District. As such, the Civic Center contains numerous buildings that are individual landmarks or are contributory to the historic districts. The project site is located just north and east of these Civic Center historic district boundaries. The Civic Center Powerhouse at 320 Larkin Street (corner of Larkin and McAllister Streets), south of the project site, is listed as noncontributory to the city-designated Civic Center Historic District. The Uptown Tenderloin National Register Historic District, roughly bounded by Mason, McAllister, Larkin, and Geary Streets and Golden Gate Avenue, is north and east of UC Hastings; the 100 McAllister Street building is within the Uptown Tenderloin Historic District boundaries, and is listed as a contributory resource to the historic district.

As a state entity, UC Hastings is not subject to City and County of San Francisco's jurisdiction or its planning and land use controls. For information, the UC Hastings campus includes sites designated in the San Francisco Planning Code as P – Public Uses, consistent with the current educational uses; the 100 McAllister Street building is in a C-3-G, Downtown Commercial – General district, which permits educational and residential uses; and the 333 Golden Gate Avenue lot and UC Hastings Parking Garage are in RC-4, Residential-Commercial High Density, districts, which allow high-density residential, commercial and institutional uses.

The EIR will further describe San Francisco Planning Code and other San Francisco zoning and planning conditions for reference and informational purposes.

2.7 LONG RANGE CAMPUS PLAN AND PROJECT APPROVALS

UC Hastings is the Lead Agency under CEQA, and is also the Project Sponsor. The following approval steps and uses of the EIR are anticipated:

- The UC Hastings Board of Directors will certify the Final Environmental Impact Report (FEIR) and adopt the Mitigation Monitoring and Reporting Program (MMRP)
- The UC Hastings Board of Directors will adopt the Long Range Campus Plan
- The State Public Works Board will consider the FEIR findings and MMRP as part the 333 Golden Gate Avenue design guidelines and performance criteria
- Future UC Hastings development projects would be reviewed in light of the FEIR and CEQA Guidelines Sections 15162, 15163, 15164, and 15168(c), to determine whether the projects’ effects would require further environmental review

The University of California, San Francisco (UCSF) will be a Responsible Agency under CEQA Guidelines Section 15381, because it could participate in the joint development of housing after adoption of the LRCP by the UC Hastings Board of Directors. The Regents of the University of California or its designee will adopt CEQA findings based upon the LRCP FEIR at the time it approves the business transaction for joint development of campus housing with UC Hastings.

3. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

☒ Aesthetics	☐ Agriculture and Forest Resources	☒ Air Quality
☐ Biological Resources	☒ Cultural Resources	☒ Geology/Soils
☒ Greenhouse Gas Emissions	☐ Hazards/Hazardous Materials	☐ Hydrology/Water Quality
☒ Land Use/Planning	☐ Mineral/Energy Resources	☒ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☒ Transportation/Circulation	☐ Utilities/Service Systems	☒ Wind/Shadow
		☒ Mandatory Findings of Significance

4. DETERMINATION

On the basis of the initial evaluation that follows:

______	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
______	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
______	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
X	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
______	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental document is required. FINDINGS consistent with this determination will be prepared.

Signature: David Seward Date: December 14, 2015

Printed Name: David Seward, Chief Financial Officer

5. EVALUATION OF ENVIRONMENTAL IMPACTS

5.1 AESTHETICS

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	☐	☒
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area or that would substantially impact other people or properties?	☐	☐	☐	☐	☒

a) Would the project have a substantial adverse effect on a scenic vista? ***Not Applicable***

Pursuant to Public Resources Code Section 21099(d)(1), "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site in a transit priority area shall not be considered significant impacts on the environment."

The Long Range Campus Plan (LRCP) would include development on existing UC Hastings properties, including construction of an approximately 57,000-gsf academic building on the vacant lot at 333 Golden Gate Avenue; demolishing the existing building at 198 McAllister Street and constructing a new campus housing building in its place; modernizing 50 Hyde Street, including the possibility of incorporating the academic functions of 50 Hyde Street into the lower levels of a campus housing complex on the combined 198 McAllister Street and 50 Hyde Street sites; and renovating the existing 100 McAllister Street building.

Development under the LRCP would meet the Section 21099(d)(1) criteria:

1. The UC Hastings campus is in a transit priority area within 0.5 mile of a major transit stop, the Civic Center BART/Muni Metro station, and is served by major bus routes with frequencies of 15 minutes or less during morning and evening rush hours.

2. Development under the LRCP would include infill sites within the existing UC Hastings campus.

3. The LRCP development of academic and campus housing buildings would include residential, retail, and employment center uses.

Therefore, potential adverse impacts on scenic vistas would not be an applicable significance criterion. However, for informational purposes, the LRCP EIR will include a discussion of the LRCP's effects on scenic vistas and other aesthetic factors.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? ***Not Applicable***

The LRCP would be contained within the existing UC Hastings campus, and no state-designated scenic highways are located within or in the vicinity of the campus. Therefore, damage to scenic resources would not be applicable to the LRCP.

c) Would the project substantially degrade the existing visual character or quality of the site and its surroundings? ***Not Applicable***

The LRCP involves construction of a replacement academic building at 333 Golden Gate Avenue and other development within the existing UC Hastings campus. 333 Golden Gate Avenue and other associated LRCP development would result in changes to the visual character of the sites and vicinity. However, as stated previously, under Public Resources Code Section 21099(d)(1), impacts on aesthetic resources as a result of infill projects within transit priority areas are not considered to be significant. Development under the LRCP would include residential, mixed-use and employment center projects, and would satisfy the three criteria in Public Resources Code Section 21099(d)(1). Therefore, impacts relating to the degradation of the existing visual character of the area would not be applicable. However, the LRCP EIR will discuss the LRCP's effects on visual character and quality for informational purposes.

d) Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area or that would substantially impact other people or properties? ***Not Applicable***

Development under the LRCP would include the replacement academic building at 333 Golden Gate Avenue and redevelopment of the 198 McAllister Street and/or 50 Hyde Street sites at the UC Hastings campus. New structures would not create substantial new sources of light and glare in the area.

5.2 AGRICULTURE AND FOREST RESOURCES

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.					
Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	☐	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	☐	☐	☐	☐	☒

UC Hastings is within an urbanized area in the City and County of San Francisco that does not contain any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; forest land; or land under Williamson Act contract. The area is not zoned for any agricultural uses. Therefore, the loss of farmland, agricultural land, or forest resources would not be applicable to the LRCP.

5.3 AIR QUALITY

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☒	☐	☐	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☒	☐	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☒	☐	☐	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☒	☐	☐	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☒	☐	☐	☐	☐

Air quality in the project area is regulated by the Bay Area Air Quality Management District (BAAQMD). Construction and operational air quality emissions will be assessed in accordance with BAAQMD guidance and methodologies. The construction analysis will focus on equipment and truck exhaust emissions. The operational analysis will focus on new vehicle trips and energy-related emissions. The EIR will analyze potential air quality emissions impacts resulting from development under the LRCP.

5.4 BIOLOGICAL RESOURCES

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

a) **Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?** ***Less-than-Significant Impact***

The LRCP encompasses the UC Hastings campus and sites within the boundaries of the campus. UC Hastings is located in an urban environment with high levels of human activity, and common bird species are the only wildlife likely to be present or nest in the area. The UC Hastings campus is primarily covered with impervious surfaces, and does not provide habitat for any rare or endangered plant or wildlife species. A search of the California Natural Diversity Database (CNDDB) revealed that no special-status species are known to occur within the LRCP area.[3]

Construction of the proposed academic building at the 333 Golden Gate Avenue site and Variants A or B could potentially affect bird migration and local movement within the LRCP area, as it would introduce a new structure to the area that may present risks for migratory birds. Other potential LRCP development would include renovation of existing structures, and thus, would have no effect on bird species. With the exception of street trees, the LRCP area does not support habitat for any known rare or endangered species. However, all LRCP development would be required to comply with the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA), which protect special-status bird species. Therefore, the LRCP would have a less-than-significant impact on special-status species.

b) **Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?** ***Not Applicable***

The UC Hastings campus is located within a densely urbanized area and does not contain riparian habitat or other sensitive natural communities. Therefore, topic (b) would not be applicable to the LRCP and will not be addressed in the EIR.

c) **Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?** ***Not Applicable***

The UC Hastings campus is not within federally protected wetlands, as defined by Section 404 of the Clean Water Act. The area covered by the LRCP is in an urban environment in the Civic

[3] CNDDB search conducted by TRC Solutions, Inc. on October 6, 2015.

Center neighborhood of San Francisco. Therefore, topic (c) would not be applicable to the LRCP and will not be addressed in the EIR.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? *Less-than-Significant Impact*

The area covered by the LRCP is within the highly urban environment of the downtown Civic Center neighborhood. Structures in an urban environment may present risks for migratory birds. No other migratory fish or wildlife species are located in the UC Hastings campus area. Although migratory birds do pass through San Francisco, development under the LRCP would not support habitat for those species. New development under the LRCP could include structures that may potentially present increased risks to birds. However, all LRCP development would be required to comply with the California Fish and Game Code and the MBTA, which protect special-status bird species. Therefore, impacts related to migratory species movement would be less than significant.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? *No Impact*

UC Hastings development projects that require changes in sidewalks or street trees under the jurisdiction of the San Francisco Department of Public Works would be subject to Article 16 of the San Francisco Public Works Code, the Urban Forestry Ordinance, which provides for the protection of landmark, significant, and street trees. Development under the proposed LRCP could potentially entail the removal of street trees. The removal of street trees would be a less-than-significant impact, and Article 16 polices would require replacement or addition of street trees as part of development. Therefore, no impact would occur.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? *Not Applicable*

UC Hastings is not within an area covered by an adopted Habitat Conservation Plan; Natural Community Conservation Plan; other approved local, regional, or state habitat conservation plan. Therefore, related impacts would not be applicable to the LRCP.

5.5 CULTURAL RESOURCES

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.	☒	☐	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☒	☐	☐	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☒	☐	☐	☐	☐
d) Cause a substantial adverse change in the significance of a tribal cultural resource, as defined in Public Resources Code §21074?	☒	☐	☐	☐	☐

The UC Hastings campus includes parts of two blocks in the Civic Center area of San Francisco, near the Tenderloin neighborhood. The campus academic buildings are near the Uptown Tenderloin National Register Historic District, and three San Francisco Civic Center historic districts—Civic Center National Historic Landmark District, Civic Center National Register Historic District, and the San Francisco Planning Code Article 10 Civic Center Historic District. One UC Hastings building, 100 McAllister Street, is within the Uptown Tenderloin National Register Historic District and is listed as a contributory resource in that district. 198 McAllister Street, built in 1953, is more than 50 years old, and therefore, requires further evaluation to determine whether it is a historic resource under CEQA. 50 Hyde Street, built in 1970, is more than 45 years old and may similarly require further evaluation. Development or redevelopment of 333 Golden Gate Avenue, 198 McAllister Street, 50 Hyde Street, and potential renovation and seismic strengthening of the 100 McAllister Street building would not directly affect the historic districts, but CEQA requires evaluation of potential contextual effects. The EIR will evaluate potential effects on historic resources.

The proposed development under the LRCP would be expected to include excavation as well as installation of building foundations. Implementation of the LRCP could result in ground disturbance within the UC Hastings campus and damage to, or destruction of, unknown archaeological, human remains, or tribal cultural resources should such resources or remains exist beneath the campus. This potential impact will also be evaluated in the EIR.

5.6 GEOLOGY AND SOILS

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☒	☐	☐	☐	☐
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☒	☐	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐	☐
iv) Landslides?	☐	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒	☐	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☒	☐	☐	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	☒	☐	☐	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐
g) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)? Less-than-Significant Impact

The UC Hastings campus is not within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults exist within or in the immediate vicinity of the College.[4] The nearest mapped active fault is the N. San Andreas Peninsula Fault, which is located approximately 7.5 miles west of the campus.[5]

During a major earthquake located on a nearby fault, very strong ground shaking would be expected to occur in the UC Hastings area; however, California Building Code requirements include building codes that mitigate the effects of seismic events and geologic hazards. Development under the LRCP would meet California Building Code requirements. Adherence to the California Building Code would incorporate engineering standards and procedures designed to alleviate the effects of seismic events. Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking? Potentially Significant Impact

The LRCP would include development of a new academic building at 333 Golden Gate Avenue, a new campus housing building at 198 McAllister Street, and potential additional campus housing at 50 Hyde Street. These facilities could subject people and structures to strong seismic ground shaking, as the UC Hastings campus is located in a seismically active area. The potential impacts related to strong seismic ground shaking would be addressed in the EIR.

iii) Seismic-related ground failure, including liquefaction? Potentially Significant Impact

The UC Hastings campus is within an area that has liquefaction potential, identified by the California Department of Conservation under the Seismic Hazards Mapping Act of 1990,[6] and could experience the effects of liquefaction. The potential impacts related to ground failure, including liquefaction, will be addressed in the EIR.

iv) Landslides? Not Applicable

The UC Hastings campus is not located in a landslide zone, as delineated in the San Francisco General Plan Safety Element.[7] The topography of the UC Hastings campus area is generally flat,

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[4] State of California Department of Conservation. Alquist-Priolo Regulatory Maps. Online: http://www.quake.ca.gov/gmaps/WH/regulatorymaps.htm. Accessed on November 2, 2015.

[5] Ibid.

[6] California Department of Conservation, Division of Mines and Geology. 2000. State of California Seismic Hazard Zones, City and County of San Francisco, Official Map.

[7] City of San Francisco. 2012. *General Plan*. Community Safety Element, Map 4. June.

and thus, is not be prone to seismically induced landslides. Therefore, topic (a.iv) is not applicable to the LRCP and will not be addressed in the EIR.

b) Would the project result in substantial soil erosion or the loss of topsoil? *Less-than-Significant with Mitigation*

The UC Hastings campus is located within a highly developed urban area covered primarily with impervious surfaces, including various buildings, streets, and sidewalks. Potential development under the LRCP would create the potential for wind- and water-borne soil erosion only in relatively small areas where soils would be exposed during potential demolition and excavation activities. These activities would occur over a short-term and temporary timeframe. Implementation of Mitigation Measure M-GS-1, Development of an Erosion and Sediment Control Plan, would further reduce potential impacts to a less-than-significant level through implementation of procedures identified in the Association of Bay Area Governments (ABAG) Manual of Standards for Erosion and Sediment Control Measures, [8] which would prevent erosion and the loss of topsoil from the campus during construction activities.

Mitigation Measure M-GS-1: Development of an Erosion and Sediment Control Plan

Prior to any grading or excavation activities, UC Hastings shall develop an Erosion and Sediment Control Plan (Plan) to prevent or reduce erosion and the loss of topsoil from development sites on the UC Hastings Campus. The Plan shall incorporate and rely upon best management practices listed in the ABAG *Manual of Standards for Erosion and Sediment Control Measures*. The Plan shall include, but not be limited to:

- a narrative briefly describing the proposed ground-disturbing activities, existing site conditions and critical areas, adjacent areas, project timeline, measures to control erosion and sedimentation, and maintenance programs;
- a map showing existing contours, activity limits, final contours, existing vegetation and critical areas, soil classifications, and location of control measures; and
- plan details, including drawings of control structures, design assumptions, and specification and maintenance notes.

Due to the temporary nature of construction activities and the implementation of sediment and erosion controls under Mitigation Measure M-GS-1, the potential impacts would be less than significant.

[8] ABAG. 1995. *Manual of Standards for Erosion and Sediment Control Measures*. Chapter 3, Erosion and Sediment Control Plans.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse? *Potentially Significant Impact*

UC Hastings could be located on a geological unit or soils that are or could become unstable with potential excavation and construction of proposed developments under the LRCP, including 333 Golden Gate Avenue, 198 McAllister Street and/or 50 Hyde Street, and 100 McAllister Street. Potential impacts related to unstable soils will be addressed in the EIR.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property? *Potentially Significant Impact*

Expansive soils expand and contract in response to changes in soil moisture, most notably when soils near the surface repeatedly change from a saturated to a low-moisture content condition. The UC Hastings area—including the 333 Golden Gate Avenue site that would be developed under the LRCP—is known to contain historic fill material; however, the presence of expansive soils is typically determined using site-specific data. [9] Potential development sites under the LRCP have the potential to be located on expansive soils. The potential impacts related expansive soils will be addressed in the EIR.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? *Not Applicable*

The UC Hastings campus is currently connected to the city's combined sewer system, which is the wastewater conveyance system for the City of San Francisco. Any new development under the LRCP would also be connected to the combined sewer system, and would not require septic tanks or other on-site land disposal systems for sanitary sewage. Therefore, topic (e) would not be applicable and will not be addressed in the EIR.

f) Would the project change substantially the topography or any unique geologic or physical features of the site? *No Impact*

The UC Hastings campus area is generally flat or gently sloping with no unique topographic, geologic, or physical features. Potential developments under the LRCP would not substantially alter the topography of the area. Therefore, no impact would occur.

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[9] Treadwell and Rollo. 2000. *Environmental Site Characterization, Hastings Property, Golden Gate Avenue and Larkin Street, San Francisco, California*. September 20.

g) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? ***Less than Significant with Mitigation Incorporated***

Development under the LRCP at 333 Golden Gate Avenue, 198 McAllister Street, and 50 Hyde Street could potentially require excavation. Future sub-grade construction at the development sites could potentially encounter and potentially damage or destroy unknown unique paleontological resources and/or unique geologic features. Based on review of a geotechnical report previously completed for the UC Hastings Parking Garage at Larkin Street and Golden Gate Avenue,[10] the adjacent 333 Golden Gate Avenue site is known to be underlain by approximately 9 feet of historic fill material, with fine to medium-grained sand (Dune Sand) extending to a maximum of 30 feet below ground surface (bgs). The 198 McAllister Street and 50 Hyde Street sites are also underlain by fill material to similar depths. Other project sites in the vicinity, including 101 Hyde Street, across Golden Gate Avenue from the 50 Hyde Street UC Hastings site, have similar subsurface conditions as described for 333 Golden Gate Avenue.[11] The geotechnical report prepared for 101 Hyde Street also stated that the Colma Formation—which is known to potentially contain paleontological resources—was present below the encountered Dune Sand. It is reasonable to assume that similar geologic formations may be present on the UC Hastings campus. As excavation depths for future LRCP development have not been defined, paleontological resources could potentially be encountered during such excavation.

However, with implementation of Mitigation Measure M-GS-2, Paleontological Resource Accidental Discovery, development under the LRCP would result in less-than-significant impacts on paleontological resources.

Mitigation Measure M-GS-2: Paleontological Resource Accidental Discovery

The following measures shall be undertaken to avoid any significant potential future project-related adverse effect on paleontological resources.

- Before the start of any earthmoving activities, UC Hastings shall retain a qualified paleontologist to train all construction personnel, including the site superintendent, involved with earthmoving activities. The training shall include the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils be encountered.

- If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work near the find, and notify UC Hastings. A qualified paleontologist shall be retained to evaluate the resource and

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[10] Ibid.

[11] Rockridge Geotechnical. 2012. *Geotechnical Study, Proposed Mid-Rise Building, 101 Hyde Street, San Francisco, California*. September 10.

prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines.[12] The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

[12] Society of Vertebrate Paleontology. 1996. *Conditions of Receivership for Paleontologic Salvage Collections (final draft)*. Society of Vertebrate Paleontology News Bulletin 166:31-32.

5.7 GREENHOUSE GAS EMISSIONS

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☒	☐	☐	☐	☐
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☒	☐	☐	☐	☐

The greenhouse gas (GHG) analysis will comply with the methodology established by the BAAQMD and other local agencies. GHG emissions will be discussed in terms of compliance with relevant GHG-reduction plans. The University of California is a founding signatory to the American College and University Presidents Climate Commitment, and is committed to reducing GHG emissions. Additional local documents that may be discussed in the GHG analysis include the Association of Bay Area Governments Sustainability Communities Strategy and the City of San Francisco's GHG-Reduction Strategies. The potential GHG emissions impact of the development under the LRCP and the potential for the LRCP to conflict with any applicable plan, policy, or regulation for the purpose of reducing the emissions of GHG will be analyzed in the EIR.

5.8 HAZARDS AND HAZARDOUS MATERIALS

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project located within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
h) Expose people or structures to a significant risk of loss, injury, or death involving fires?	☐	☐	☒	☐	☐

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? *Less-than-Significant Impact*

Approval of the LRCP would not alter land uses of the UC Hastings campus to include uses such as industrial or manufacturing activities that could potentially involve large quantities of hazardous materials. Common types of hazardous materials—such as cleaners, disinfectants, and chemical agents—are currently used on the campus, and would continue to be used after approval of the LRCP. These commercial products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures.

As described in the Phase I Environmental Site Assessments (ESAs) completed for potential development sites under the LRCP, UC Hastings is permitted to use, maintain, and dispose of small quantities of hazardous material on campus property.[13,14] Development of the 333 Golden Gate Avenue site with an academic building could potentially require a slight increase in the use of such materials for operation and maintenance purposes. However, it is unlikely that a small increase in quantity would change the pattern of hazardous materials use and transportation on the UC Hastings campus. The majority of these hazardous materials would be consumed upon use, and would produce very little waste.

The state manages hazardous materials and waste under the California Health and Safety Code (HSC). Division 20, Chapter 6.5 of the HSC governs standards for topics including, but not limited to, reporting, control, transportation, and disposal of hazardous materials and waste within California.[15] As an existing facility that stores, consumes, and transports small quantities of hazardous materials, UC Hastings complies with the applicable requirements of the California HSC. The potential small increase of storage, use, and transportation of hazardous materials and waste under the LRCP would not be anticipated to alter compliance with HSC standards.

In addition, although not subject to San Francisco jurisdiction or code requirements, UC Hastings voluntarily participates in certain San Francisco Department of Public Health (SFDPH) regulatory programs governing hazardous waste and is permitted to use, store and dispose of small amounts of hazardous waste under them. Development of new academic, campus housing, or support space under the LRCP would entail similar levels of use of hazardous materials, and would be permitted under current procedures

Transportation of any additional hazardous materials would also be regulated by the California Highway Patrol and the California Department of Transportation; however, the described hazardous materials are not expected to cause any substantial health or safety hazards. Therefore, potential impacts related to the routine use, transport, and disposal of hazardous materials would be less than significant.

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[13] TRC Solutions. 2015. *Phase I Environmental Site Assessment, 333 Golden Gate Avenue, San Francisco, CA, 94102*. November.

[14] TRC Solutions. 2015. *Phase I Environmental Site Assessment, 198 McAllister Street, San Francisco, CA, 94102*. November.

[15] State of California. 2015. Legislative Counsel. California Health and Safety Code, Division 20. Online. http://www.leginfo.ca.gov/cgi-bin/calawquery?codesection=hsc. Accessed on November 25, 2015.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? ***Less than Significant with Mitigation Incorporated***

Development under the LRCP would result in demolition of existing buildings and construction in the downtown Civic Center and Tenderloin areas. While UC Hastings is not subject to San Francisco jurisdiction or code requirements related to hazardous materials, demolition and construction activities would adhere to all appropriate standards and procedures—including the California Health and Safety Code—regarding proper mitigation of hazardous materials.

Under the LRCP, sites at UC Hastings—including 333 Golden Gate Avenue, 198 McAllister Street, and/or 50 Hyde Street—would be developed with new campus buildings. As previously noted, Phase I ESAs were completed for those sites to assess the potential for adverse environmental impacts to result from the current and historical practices on the sites and the surrounding area. Recognized Environmental Conditions (RECs) were determined likely to be present at those locations, and are summarized in the following paragraphs.

333 Golden Gate Avenue

Prior to its use as a demonstration garden and paved recreational area, 333 Golden Gate Avenue was used for housing and office buildings from the early to late 20th century. Previous sampling at the site and the adjacent UC Hastings parking structure indicated the presence of total petroleum hydrocarbons as diesel (TPHd) and lead in soils.[16]

Under Article 22A of the San Francisco Health Code (Maher Ordinance), the SFDPH has identified sites that are likely to contain earthquake rubble (historic landfill), which may contain contaminated soils. According to Maher Ordinance maps, the 333 Golden Gate Avenue site is underlain by historic landfill and may contain contaminated soils.[17]

198 McAllister Street

198 McAllister Street was used for housing in the early 1900s, and was then used as an automobile parking area, with auto grease and petroleum products present. A previous Leaking Underground Storage Tank (LUST) case was determined to be present north (up-gradient) of the site, listing previous contamination of TPH. Review of the Phase I ESA determined that due to a lack of records pertaining to the past storage and use of such products at the site and the known historic presence of contamination in an up-gradient location, related contamination could be present in underlying soils. Although not listed as a known Maher area, the 198

[16] TRC Solutions. 2015. *Phase I Environmental Site Assessment, 333 Golden Gate Avenue, San Francisco, CA, 94102*. November.

[17] City and County of San Francisco Planning Department. 2015. Expanded Maher Area map. March 2015. Online: http://www.sf-planning.org/ftp/files/publications_reports/library_of_cartography/Maher%20Map.pdf. Accessed on November 4, 2015.

McAllister site and vicinity is understood to be underlain by historic fill material, which is known to potentially contain high levels of lead.[18]

50 Hyde Street

50 Hyde Street was historically used for housing from the late 1800s to the early 1900s, and was occupied by an auto shop and auto sales room until the mid-1900s. At that time, the site changed use and functioned as a hotel until the late 1960s. By the early 1970s, 50 Hyde Street was adjoined to the 198 McAllister Street building to the south, and was operated as a UC Hastings campus building. Review of the Phase I ESA determined that past uses of the adjoining 198 McAllister Street property included storage and use of petroleum products, which may have led to potential sub-surface impacts on both properties. As previously described, a former LUST case was determined to be present north (up-gradient) of the site, listing previous contamination of TPH and stating that related contamination could potentially be present in underlying soils. Finally, while not listed as a known Maher area, the 50 Hyde Street site and vicinity are understood to be underlain by historic fill material, which is known to potentially contain high levels of lead.[19]

Due to the likely presence of contaminated soils at these sites, construction activities, such as grading and excavation, have the potential to accidentally release constituents into the environment. However, implementation of Mitigation Measure M-HZ-1, Phase II Subsurface Investigation and Remediation, would require that prior to development on any site under the LRCP, UC Hastings would conduct a subsurface investigation to clearly identify any potential contaminants and define the extent of impacted soils at development sites. If contamination were to be discovered, UC Hastings would properly remove and dispose of materials at an appropriate facility in compliance with Division 20, Chapter 6.5 of the California HSC. As previously noted, transportation of any hazardous materials would also be regulated by the California Highway Patrol and the California Department of Transportation.

Mitigation Measure M-HZ-1: Phase II Subsurface Investigation and Remediation

Prior to any development activities, UC Hastings shall conduct a Phase II investigation of subsurface soils, and clearly identify and characterize contaminants of concern (COC) present at development sites. Subsurface investigations shall also define the extent of impacted soils and include recommendations for the limits of removal necessary to achieve compliance with California Regional Screening Levels for residential and mixed-use developments. If determined necessary, UC Hastings shall prepare remedial action plans to properly remove and dispose of materials containing COCs at an appropriately permitted facility, in compliance with Division 20, Chapter 6.5 of the California Health

[18] TRC Solutions. 2015. *Phase I Environmental Site Assessment, 198 McAllister Street, San Francisco, CA, 94102*. November.
[19] TRC Solutions. 2015. *Phase I Environmental Site Assessment, 50 Hyde Street, San Francisco, CA, 94102*. November.

and Safety Code, and with California Highway Patrol and California Department of Transportation regulations.

As construction activities would follow all appropriate standards and procedures, including the California Health and Safety Code, regarding proper mitigation of hazardous materials, potential impacts would be less than significant.

Development under the LRCP would result in demolition of existing buildings. Due to the age of the buildings on the UC Hastings campus, the potential exists for hazardous building materials, such as lead-based paint (LBP) and asbestos-containing materials (ACM), to be present in those structures. If these or other hazardous building materials were present, disruption of these materials could pose health concerns for construction workers and the surrounding environment if not properly handled or disposed of. However, implementation of Mitigation Measure M-HZ-2, Hazardous Building Materials Abatement, would require that the presence of such materials be evaluated prior to demolition or renovation. If such materials are found present, Mitigation Measure M-HZ-2 would require that these materials be properly handled and disposed of. With implementation of Mitigation Measure M-HZ-2, potential impacts resulting from exposure to hazardous building materials would be reduced to a less-than-significant level.

Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement

UC Hastings shall ensure that any portion of the structure planned for demolition or renovation is surveyed for hazardous building materials including, lead, asbestos containing materials, polychlorinated biphenyls (PCB)-containing electrical equipment, fluorescent light ballasts containing PCBs or bis (2-ethylhexyl) phthalate (DEHP), and fluorescent light tubes containing mercury vapors. These materials shall be removed and properly disposed of prior to the start of demolition or renovation. Light ballasts that are proposed to be removed during renovation shall be evaluated for the presence of PCBs; if the presence of PCBs in the light ballasts cannot be verified, it shall be assumed that they contain PCBs, and shall be handled and disposed of as such, according to applicable laws and regulations. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to federal and state laws and regulations.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? ***Less than Significant with Mitigation Incorporated***

Several schools are located within 0.25 mile of the UC Hastings campus, including the following:

- De Marillac Academy, at 175 Golden Gate Avenue, approximately 0.08 mile northeast
- Art Institute of California, at 1170 Market Street, approximately 0.1 mile south
- L.E.N. Business and Language Institute, at 1254 Market Street, approximately 0.2 mile south-southwest
- Tenderloin Community Early Elementary School, at 627 Turk Street, approximately 0.2 mile northwest.

Although not subject to San Francisco jurisdiction or code requirements, as noted previously, UC Hastings currently complies with SFDPH regulations and is permitted to use, store, and dispose of small amounts of hazardous waste on the campus. Development of new academic, campus housing, or support space under the LRCP would entail similar levels of use of hazardous materials, and would be permitted under current procedures.

Construction activities under the LRCP could potentially cause the release of hazardous building materials, if they are determined to be present at development sites. However, with implementation of Mitigation Measures M-HZ-1, Phase II Subsurface Investigation and Remediation, and M-HZ-2, Hazardous Building Materials Abatement, risks from a release of hazardous building materials would be avoided. Further, implementation of Mitigation Measure M-HZ-3: Preparation of a Stormwater Pollution Prevention Plan, a Stormwater Pollution Prevention Plan (SWPPP), incorporating Best Management Practices (BMPs) identified under the State Water Resources Control Board's (SWRCB) Construction General Permit (Order No. 2009-009-DWQ),[20] would control stormwater runoff from the project area, preventing or minimizing potential impacts from hazardous materials and sediments entering San Francisco's combined stormwater and sewer system.

Mitigation Measure M-HZ-3: Preparation of a Stormwater Pollution Prevention Plan

UC Hastings shall prepare and implement, or shall cause to be prepared and implemented, a Stormwater Pollution Prevention Plan (SWPPP) to prevent or minimize the discharge of pollutants and other sediments to San Francisco's combined stormwater and wastewater sewer system. The SWPPP shall incorporate and rely upon Best

[20] State Water Resources Control Board. 2015. Storm Water Program. Construction Storm Water Program. Online. http://www.waterboards.ca.gov/water_issues/programs/stormwater/construction.shtml. Site visited December 9, 2015.

Management Practices (BMPs) identified in Section A of the Construction General Permit (Order No. 2009-009-DWQ) of the State Water Resources Control Board.

The SWPPP shall contain, but not be limited to, a site map(s) that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP shall list BMPs the project contractor would use to protect stormwater runoff, and the placement of those BMPs. Additionally, the SWPPP shall contain a visual monitoring program and chemical monitoring program for "non-visible" pollutants, to be implemented if there is a failure of BMPs.

The operation of proposed academic and campus housing facilities would not generate hazardous emissions. For the reasons described previously, impacts would be reduced to a less-than-significant level.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? ***Less-than-Significant Impact***

Development under the LRCP could occur on sites identified as hazardous material sites pursuant to Government Code Section 65962.5. Review of the Regional Water Quality Control Board (RWQCB) and California Department of Toxic Substances Control (DTSC) online Geotracker and EnviroStor databases indicated that no sites with indication of significant environmental impacts are present within the UC Hastings campus. However, a LUST cleanup site was identified near to and up-gradient of the UC Hastings buildings at 50 Hyde Street and 198 McAllister Street; if contamination from the identified LUST site migrated beneath the UC Hastings campus, this site may have resulted in subsurface environmental impacts. However, soils underlying potential LRCP development sites would be characterized and, if applicable, remediated in accordance with Mitigation Measure M-HZ-1, Phase II Subsurface Investigation and Remediation, reducing potential impacts to a less–than-significant level.

As previously described, the 333 Golden Gate Avenue site is within a known Maher Ordinance area. While the 198 McAllister and 50 Hyde Street sites are not known to be within a defined Maher Ordinance area, the sites and surrounding vicinity are likely underlain by historic fill material. Although UC Hastings is not subject to SFDPH requirements (which necessitate soil sampling if a project requires excavation of an area subject to the Maher Ordinance), soils underlying potential development sites under the LRCP would be characterized and, if applicable, remediated in accordance with Mitigation Measure M-HZ-1, Phase II Subsurface Investigation and Remediation, reducing potential impacts to a less-than-significant level.

Phase I ESAs were completed for potential development sites—including 333 Golden Gate Avenue, 198 McAllister Street, and 50 Hyde Street—under the LRCP. RECs—including the known presence of historic fill at 333 Golden Gate Avenue, potential TPH contamination at 198

McAllister Street and 50 Hyde Street from previous site uses and an identified historic up-gradient LUST case, and the likely presence of fill beneath 198 McAllister Street and 50 Hyde Street—were determined present at those locations.

Prior to any ground-disturbing activities within potential LRCP development sites, soils would be sampled to properly identify and characterize the extent of any hazardous materials, and, if applicable, remediated under Mitigation Measure M-HZ-1, Phase II Subsurface Investigation and Remediation. If the presence of contaminants were detected, prior to construction, the affected soils would be removed and properly disposed of at a landfill that is licensed to accept hazardous materials. Because any potential contamination would be removed from sites subject to LRCP development within the campus, the sites would not be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, impacts would be less than significant.

e) Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, resulting in a safety hazard for people residing or working in the project area? ***Not Applicable***

The UC Hastings campus is located in downtown San Francisco and is not located within an airport use plan area. The LRCP is only applicable to UC Hastings sites, and therefore, topic (e) would not be applicable and will not be addressed in the EIR.

f) Would the project be located within the vicinity of a private airstrip, resulting in a safety hazard for people residing or working in the project area? ***Not Applicable***

The UC Hastings campus is not located within the vicinity of a private airstrip. The LRCP is only applicable to UC Hastings campus sites, and therefore, topic (f) would not be applicable and will not be addressed in the EIR.

g) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ***Less-than-Significant Impact***

Additional residents, employees, and visitors resulting from development under the LRCP could contribute to congestion in the area if an emergency evacuation of the greater downtown area were required. Although UC Hastings is not subject to San Francisco jurisdiction or code requirements, implementation of the College's existing emergency procedures and exit drill plans[21] would be consistent with the city's Emergency Response Plan and potential impacts would be less than significant.

[21] UC Hastings College of the Law, Department of Public Safety. 2010. UC Hastings Emergency Procedure Plan. July.

h) Would the project expose people or structures to a significant risk of loss, injury, or death involving fires? ***Less-than-Significant Impact***

The LRCP would not expose students, faculty, and staff to significant risks involving fire. The LRCP would develop 333 Golden Gate Avenue with a replacement academic building, develop 198 McAllister Street and/or 50 Hyde Street with new campus housing and academic facilities, and rehabilitate and seismically strengthen the 100 McAllister Street building. UC Hastings would be required to comply with California Building Codes .The existing emergency procedures and exit drill plans at UC Hastings would be implemented throughout the entire campus, which would include developments under the LRCP. Furthermore, the UC Hastings campus is not within a fire hazard severity zone.[22] Therefore, potential LRCP impacts related to fire hazards would be less than significant.

[22] California Department of Forestry and Fire Protection. 2007. Draft Fire Hazard Severity Areas in LRA, San Francisco (Map). September 17.

5.9 HYDROLOGY AND WATER QUALITY

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☒	☐	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☐	☒

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☐	☒
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☐	☒

a) Would the project violate any water quality standards or waste discharge requirements? ***Less-than-Significant Impact***

Development under the LRCP would generate wastewater that would flow to the city's combined stormwater and sewer system to be treated at the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Wastewater and stormwater are currently treated to standards contained in the city's National Pollutant Discharge Elimination System (NPDES) Permit, which is regulated by the San Francisco Bay Area RWQCB, and future development would continue to comply with all applicable regulations. UC Hastings is located in downtown San Francisco, which has sufficient existing wastewater and stormwater infrastructure in place to support current buildings and uses. The LRCP would introduce additional facilities and housing units to the area, creating an incremental increase in water discharged to the combined system. However, the existing system would have sufficient capacity to accommodate this incremental increase (see Section 5.17, Utilities and Service Systems, for a more detailed discussion of water supply and wastewater treatment capacity). LRCP development would include measures—such as water efficient fixtures and stormwater management systems—required by Title 24 of the California Code of Regulations, to retain water discharge from the campus to the extent possible.

During construction under the LRCP, the potential for erosion and transportation of soil particles would exist. Once in surface water runoff, sediment and other pollutants could leave construction sites and drain into the combined sewer and stormwater system, necessitating treatment at the Southeast Water Pollution Control Plant prior to discharge into the San Francisco Bay. Implementation of Mitigation Measure M-GS-1, Development of an Erosion and Sediment Control Plan, would minimize surface water runoff and sediment and other pollutants from entering the combined sewer and stormwater system. Groundwater has been previously observed at a depth of approximately 20 feet bgs in the project vicinity[23] and,

[23] Treadwell and Rollo. 2000. *Environmental Site Characterization, Hastings Property Golden Gate Avenue and Larkin Street, San Francisco, California.* September 20.

depending on the depth of excavations, groundwater could potentially be encountered during LRCP construction activities. However, if necessary, dewatering activities would be temporary and limited to the duration of construction, and any groundwater encountered would be contained and tested for compliance with NPDES requirements prior to discharge to the city's combined sewer system. Therefore, the LRCP would have a less-than-significant impact on water quality and discharge.

b) Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? *Less-than-Significant Impact*

As noted previously, the UC Hastings campus is in a developed urban area covered primarily by impervious surfaces, greatly limiting the amount of surface that water could infiltrate to groundwater. Development under the LRCP would completely cover each site with impervious surfaces, and therefore, would not significantly alter the amount of area that water could infiltrate to the groundwater. Excavation associated with future development could encounter groundwater, depending on the depth of excavation and groundwater conditions at a particular project site, as groundwater has been previously observed at a depth of approximately 20 feet bgs in the project vicinity.[24,25]

Potential development under the LRCP would follow all applicable regulations and would not result in the use of groundwater. Furthermore, if groundwater were to be encountered, construction dewatering would be implemented. If dewatering were necessary during construction, activities would be short term, limited to the duration of construction, and would not significantly deplete groundwater in the area. Therefore, the LRCP would have a less-than-significant impact on groundwater recharge.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site? *Less-than-Significant Impact*

Development under the LRCP would not alter any natural drainage patterns or result in any erosion or siltation, as UC Hastings is in a developed urban environment and is generally covered by impervious surfaces. The campus currently maintains a demonstration garden at the 333 Golden Gate Avenue property; however, the site is completely covered with an asphalt surface, and vegetation is maintained in aboveground planter boxes that would be removed prior to any development activities. Therefore, no erosion or siltation would occur. Potential

[24] Ibid.

[25] Rockridge Geotechnical. 2012. *Geotechnical Study, Proposed Mid-Rise Building 101 Hyde Street, San Francisco California*. September 10.

development under the LRCP could alter the existing footprints of established buildings and include construction of new buildings; however, all potential structures would be typical of the surrounding cityscape, and would not alter drainage patterns of the area. Implementation of Mitigation Measure M-GS-1, Development of an Erosion and Sediment Control Plan, in Section 5.6, Geology and Soils, would minimize surface water runoff and sediment and other pollutants from entering the combined sewer and stormwater system, and would avoid changing drainage patterns,

During construction, excavation of development sites could potentially release sediments into the city's combined stormwater and sewer system. However, as previously described in Section 5.8, Hazards and Hazardous Materials, implementation of Mitigation Measure M-HZ-3, Preparation of a Stormwater Pollution Prevention Plan, including BMPs, would minimize the potential for pollutants to migrate off site and enter the city's combined sewer and stormwater system; this would reduce potential impacts to a less-than-significant level.

d) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site? *Less-than-Significant Impact*

Development under the LRCP would not substantially alter any drainage patterns, and no streams or rivers are located in the vicinity of the UC Hastings campus. Although LRCP development is planned to include a new academic building at 333 Golden Gate Avenue, all potential development sites are currently covered by impervious surfaces. Therefore, the LRCP would not create additional impervious surfaces in the area, and would not alter drainage patterns on the UC Hastings campus. Furthermore, during construction, implementation of Mitigation Measure M-HZ-3, Preparation of a Stormwater Pollution Prevention Plan, including BMPs, would minimize the potential for pollutants to migrate off site and enter the city's combined sewer and stormwater system, thereby reducing potential impacts from water runoff to a less-than-significant level. All other applicable regulations would be followed. Therefore, impacts related to surface runoff would be less than significant.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? *Less-than-Significant Impact*

The UC Hastings campus is located in downtown San Francisco, with water runoff currently flowing to the city's Southeast Water Pollution Control Plant, which has sufficient existing wastewater and stormwater infrastructure in place to support current buildings and uses. The UC Hastings campus and surrounding area is predominantly covered by impervious surfaces, including streets, sidewalks, and buildings or other infrastructure. Development under the LRCP would not substantially contribute additional impervious surfaces beyond the current conditions, and thus, would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, or provide substantial additional sources of polluted runoff beyond current conditions. Therefore, the LRCP would have a less-than-significant impact.

Further, development under the LRCP would implement and install appropriate stormwater management systems that would retain runoff on site, promote stormwater reuse, and limit the site discharge entering the combined sewer collection system.

f) Would the project otherwise substantially degrade water quality? *Less-than-Significant Impact*

As previously discussed, UC Hastings is located in an area of San Francisco that is predominantly covered with impervious surfaces, and potential development under the LRCP would not contribute significant new amounts of impervious surfaces that would contribute polluted runoff or affect drainage patterns. Development under the LRCP would all be serviced by the city's combined stormwater and sewer system, and would not contribute a substantial enough amount of new wastewater to necessitate expansion or addition of facilities.

During construction activities, implementation of Mitigation Measure M-HZ-3, Preparation of a Stormwater Pollution Prevention Plan, including BMPs, would minimize the potential for pollutants and sediments to migrate off site and enter the city's combined sewer and stormwater system. The SWPPP would ensure that siltation and runoff to the city's combined system would be minimized, to the extent possible, during construction activities. For these reasons, development under the LRCP would have a less-than-significant impact on water quality.

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map? *Not Applicable*

The UC Hastings campus is not within a 100-year flood hazard area, and thus, development under the LRCP would not be within a 100-year flood hazard area.[26] Therefore, topic (g) would not be applicable and will not be addressed in the EIR.

[26] Federal Emergency Management Agency. 2007. Draft Special Flood Hazard Areas (San Francisco).

h) Would the project place within a 100-year flood hazard area structures that would impede or redirect flood flows? ***Not Applicable***

The UC Hastings campus is not within a 100-year flood hazard area, and thus, development under the LRCP would not be within a 100-year flood hazard area.[27] Therefore, topic (h) would not be applicable and will not be addressed in the EIR.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam? ***Not Applicable***

The UC Hastings campus is not within a dam failure area, as indicated by the San Francisco General Plan Community Safety Element.[28] Therefore, development under the LRCP would not be within a dam failure area and topic (i) would not be applicable and will not be addressed in the EIR. Further, as addressed under topic (h), UC Hastings is not located within a 100-year flood hazard area and would not expose people or structures to risk involving flooding.

j) Would the project expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow? ***Not Applicable***

The UC Hastings campus is not within a tsunami hazard area, as indicated by the San Francisco General Plan Community Safety Element.[29] Development under the LRCP would not be subject to mudslide hazards as the campus is not located within a landslide-prone area. A seiche is an oscillation of a water body, such as a bay, that may cause local flooding. A seiche could occur in the San Francisco Bay due to seismic or atmospheric activity. However, the UC Hastings campus is approximately 1.5 miles from San Francisco Bay, and thus, development under the LRCP would not be subject to a seiche. Topic (j) would not be applicable and will not be addressed in the EIR.

[27] Ibid.
[28] City of San Francisco. 2012. *General Plan.* Community Safety Element, October 2012, Map 6.
[29] Ibid, Map 5.

5.10 LAND USE AND PLANNING

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Physically divide an established community?	☐	☐	☒	☐	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☐	☐	☐
c) Have a substantial impact upon the existing character of the vicinity?	☒	☐	☐	☐	☐

a) Would the project physically divide an established community? *Less-than-Significant Impact*

Implementation of the LRCP and associated projects would not physically divide an established community. Any potential future development under the LRCP would occur on the existing UC Hastings campus. No roads or other infrastructure that could physically divide the area are proposed as a part of the LRCP. Therefore, impacts would be less than significant.

b) Would the project conflict with any applicable land use plan or policy? *Potentially Significant Impact*

As a state entity, UC Hastings is not subject to City and County of San Francisco jurisdiction, or its planning and land use controls. For information, the UC Hastings campus includes sites designated in the San Francisco Planning Code as P – Public Uses, consistent with the current educational uses; the 100 McAllister Street building is in a C-3-G, Downtown Commercial – General district, which permits educational and residential uses; and the 333 Golden Gate Avenue lot and UC Hastings Parking Garage are in RC-4, Residential-Commercial High Density, districts, which allow high-density residential, commercial and institutional uses.

The EIR will further describe San Francisco Planning Code and other San Francisco zoning and planning conditions for reference and informational purposes.

c) Would the project have a substantial impact upon the existing character of the vicinity? ***Potentially Significant Impact***

Implementation of the LRCP would result in changes in use of existing buildings and developed areas at the UC Hastings campus, which could result in potentially significant impacts on the existing character of the vicinity. These potential impacts will be evaluated in the EIR.

5.11 MINERAL AND ENERGY RESOURCES

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☐	☒
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? *Not Applicable*

All land in the City of San Francisco, including the area covered by the LRCP, is designated by the California Division of Mines and Geology as Mineral Resource Zone (MRZ)-4 under the Surface Mining and Reclamation Act of 1975.[30] The MRZ-4 designation indicates that adequate information does not exist to assign the area to any other MRZ; thus, the area is not designated as containing significant mineral deposits. Furthermore, the UC Hastings campus is located in a highly developed area, and implementation of the LRCP would not have any impact on the presence of minerals at the site. Therefore, the loss of a known mineral resource would not occur and topic (a) would not be applicable and will not be addressed in the EIR.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? *Not Applicable*

As described previously, the UC Hastings campus is located in an area designated as MRZ-4, and it is assumed that no significant mineral deposits exist at the site. Furthermore, according to the San Francisco General Plan, no significant mineral resources exist in all of San Francisco, and therefore, the loss of locally important minerals would not occur and topic (b) would not be applicable and will not be addressed in the EIR.

[30] California Division of Mines and Geology. Open File Report 96-03 and Special Report 146 Parts I and II.

c) Would the project encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner? ***Less-than-Significant Impact***

Development under the LRCP would replace academic and replace or add housing facilities to the area, which could include an increased consumption of energy resources. However, potential development under the LRCP would be in a densely developed area of San Francisco, and energy demand would be typical for an urban academic campus. Future development under the LRCP would comply with current state codes concerning energy consumption, including Title 24 of the California Code of Regulations. UC Hastings would continue to be served by existing utilities in San Francisco, and would not require expansion of power facilities.

UC Hastings supports Governor Brown's efforts and intends to adopt the goals stipulated in Executive Order B-30-15, which establishes a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030 to reduce carbon emissions over the next decade and a half.

Therefore, the energy demand associated with the LRCP would result in a less-than-significant impact.

5.12 NOISE

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐	☐
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☒	☐	☐	☐	☐
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒
g) Be substantially affected by existing noise levels?	☒	☐	☐	☐	☐

a) Would the project expose persons to noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? ***Potentially Significant Impact***

UC Hastings voluntarily complies with the City of San Francisco Noise Ordinance. Implementation of the LRCP would include changes on the UC Hastings campus, and development under the LRCP would include new construction and operational noise. The potential noise impacts of changes on the UC Hastings campus will be addressed in the EIR.

b) Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels? *Potentially Significant Impact*

Development under the LRCP could potentially increase groundborne vibration or groundborne noise levels during construction activities. The potential changes on campus included in the LRCP would not include substantial sources of operational vibration. Potential construction and operational vibration impacts will be analyzed in the EIR.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? *Potentially Significant Impact*

Development and land uses under the LRCP would be similar to the current uses on the UC Hastings campus. Because the changes under the LRCP may result in new noise sources, the potential noise impacts of these changes will be addressed in the EIR.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project? *Potentially Significant Impact*

Development and land uses under the LRCP would be similar to the current uses on the UC Hastings campus. Because the changes under the LRCP may result in temporary construction noise, the potential noise impacts of these changes will be addressed in the EIR.

e) Would the project be located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, exposing people residing or working in the area to excessive noise levels? *Not Applicable*

No airports are located within 2 miles of the City of San Francisco. San Francisco International Airport is over 5 miles from the city. Therefore, impacts from exposure to excessive noise levels from public use airports are not applicable to the LRCP, and topic (e) will not be addressed in the EIR.

f) Would the project be located in the vicinity of a private airstrip, exposing people residing or working in the project area to excessive noise levels? *Not Applicable*

No private airstrips are located within 2 miles of the City of San Francisco. Therefore, impacts resulting from exposure to excessive noise levels from a private airstrip are not applicable to the LRCP, and topic (f) will not be addressed in the EIR.

g) Would the project be substantially affected by existing noise levels? *Potentially Significant Impact*

As a program-level document, the LRCP EIR will address overall land use changes and development. The EIR will describe existing noise conditions in the UC Hastings area and their relationship to noise acceptability criteria in urban settings. Land use changes and construction proposed under the LRCP may result in new noise sources. The EIR will also address potential noise impacts related to LRCP development

5.13 POPULATION AND HOUSING

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐	☐
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐	☐

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)? ***Less-than-Significant Impact***

In general, a project would be considered growth inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not implemented. The potential development of new campus housing units under the LRCP—including approximately 8 to 98 units at 100 McAllister Street, approximately 400 to 600 units at 198 McAllister Street (Variant A), and/or approximately 525 to 770 units at 198 McAllister Street and 50 Hyde Street (Variant B)—could directly induce population growth in the UC Hastings campus area and the citywide context. The housing would serve the UC Hastings population, and potentially, the UCSF population. The 2010 U.S. Census reported a population of 805,235 residents in the City and County of San Francisco. The area covered by the proposed LRCP includes parcels located within U.S. Census Tract 12402, reporting a population of 3,974 residents.[31]

The LRCP would include construction of a replacement academic facility on the UC Hastings campus at 333 Golden Gate Avenue, and would potentially develop new campus housing at 100 McAllister Street, 198 McAllister Street, and 50 Hyde Street. The LRCP would include

[31] United States Census. 2010. New York Times. Mapping the U.S. Census. Online: http://projects.nytimes.com/census/2010/map?view=PopChangeView&l=14&lat=37.78219966826208&lng=-122.41140246867958. Accessed on November 2, 2015.

renovation and seismic strengthening activities at the 100 McAllister Street building. The UC Hastings campus is located in an urbanized area and implementation of the LRCP would not be expected to substantially alter existing development patterns in the Civic Center neighborhood, or in San Francisco as a whole. Because UC Hastings is in an established urban neighborhood, the LRCP would not require or create new demand for extension of municipal infrastructure. While the addition of housing units on campus would be noticeable to residents of the immediate neighborhood, this would not result in a substantial increase in the population. Students would be expected to vacate housing elsewhere in the city once the new campus housing developed under the LRCP is opened. This would only result in a projected incremental increase of approximately 870 new residents in the city as vacated housing units are occupied. Along with the reduction in UC Hastings student body, the LRCP is anticipated to result in an eventual reduction of demand on housing in the city.

Retail space or campus amenities uses proposed as part of the LRCP at the new 333 Golden Gate Avenue site or as part of 198 McAllister Street or 50 Hyde Street development would not be expected to require the employment of substantial additional staff**.** Any retail employment created as a result of development under the LRCP would not likely offer sufficiently high wages such that it would be anticipated to attract new employees to San Francisco (or nearby communities); thus, the project would not generate demand for new housing for potential retail employees, and impacts would be less than significant.

b) Would the project displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing? ***Less-than-Significant Impact***

The LRCP would not displace existing housing units, as it would potentially include approximately eight to 98 new units at 100 McAllister Street, 400 to 600 new units at 198 McAllister Street (Variant A), and/or approximately 525 to 770 new units at 198 McAllister Street and 50 Hyde Street (Variant B). The replacement academic building at the 333 Golden Gate Avenue site, which is currently a recreational and open space area, would not displace any residents or housing units. Development of housing at 198 McAllister Street and 50 Hyde Street would meet the current housing needs of the UC Hastings student population, and potentially, the UCSF student population. Overall, development under the LRCP would add approximately 408 to 868 units of housing in the UC Hastings area, and would be expected to reduce the demand placed on the local housing market by students who would otherwise seek market-rate housing in the vicinity.

The renovation of the housing at 100 McAllister Street proposed under the LRCP could possibly temporarily displace students residing in the 252-unit facility; however, plans call for the existing housing stock at 100 McAllister Street to be maintained until the new housing at 198 McAllister Street and/or 50 Hyde Street is opened for use.

An estimated 10 to 20 new permanent jobs would be created under the LRCP. The retail employment created by implementation of the LRCP would not likely attract a substantial amount of new employees to San Francisco because the number of new of jobs would be negligible and the type of retail jobs would be comparable to those elsewhere in the city. Therefore, it can be anticipated that most of the employees would live in San Francisco (or nearby communities), and that the LRCP would not generate demand for new housing for these employees.

Therefore, the LRCP would have a less-than-significant impact related to the displacement of housing or the creation of demand for additional housing elsewhere.

c) **Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere? *Less-than-Significant Impact***

The LRCP would not displace people from the area as it would only affect the UC Hastings campus. 333 Golden Gate Avenue, which is currently vacant, would be developed with a replacement academic facility. Furthermore, development of housing at 198 McAllister Street and 50 Hyde Street would meet the current housing needs of the UC Hastings and potentially UCSF student population. The proposed renovation of the housing at 100 McAllister Street under the LRCP could temporarily displace students residing in the 252-unit facility; however, impacts would be temporary and no long-term effects on housing supply would occur. Additionally, as stated previously, the existing housing stock at 100 McAllister Street would be maintained until the new housing at 198 McAllister Street and/or 50 Hyde Street is opened for use.

As noted previously, development under the LRCP would add approximately 8 to 98 units of housing at 100 McAllister Street and approximately 400 to 600 units of housing under Variant A or 525 to 770 units of housing under Variant B, and would be expected to reduce the UC Hastings student demand for market-rate housing in the vicinity.

Therefore, the LRCP would not require replacement housing, and impacts would be less than significant.

5.14 PUBLIC SERVICES

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	☐	☐	☒	☐	☐

a) **Would the project result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?** ***Less-than-Significant Impact***

Police Services

The UC Hastings Public Safety Department provides on-campus police protection. Development under the LRCP, including new housing, could incrementally increase the demand for police services within the UC Hastings campus area, as well as in the City of San Francisco. However, the increase in student population would not be substantial in light of the existing demand for police services throughout the city and UC Hastings campus area. It is anticipated that the UC Hastings Public Safety Department would have sufficient resources to maintain public safety throughout the campus. Furthermore, San Francisco police services in the area are provided by the Tenderloin Police Station at 301 Eddy Street (on the corner of Eddy and Jones Streets), approximately three blocks east of UC Hastings. Because UC Hastings maintains its own public safety department and development under the proposed LRCP would be in proximity to existing police services, impacts would be less than significant.

Alternatively, UC Hastings has studied the possibility of having public safety services provided by the UCSF Police Department. This would result in higher levels of service with expanded police services and functionality. In December 2015, the UC Hastings Board of Directors authorized the commencement of contract negotiations with UCSF and has directed staff to assure that all provisions of the Higher Education Employee Employer Relations Act are met.

Fire Services

The San Francisco Fire Department provides fire safety services in the UC Hastings area. The nearest fire stations to the UC Hastings campus include Station 3 at 1067 Post Street, approximately seven blocks north of the campus, and Station 36 at 109 Oak Street, approximately 10 blocks southwest of the campus. Potential development under the LRCP would increase demand for fire services; however, the increase would not require the alteration or addition of existing facilities. New development under the LRCP would meet current life-safety standards. Therefore, impacts associated with fire services would be less than significant.

Schools

Implementation of the LRCP would increase the resident student population on campus. This increased student population would not be expected to include a substantial number of families with children who would attend public schools in San Francisco. Students would be expected to vacate housing elsewhere in the city once the new campus housing developed under the LRCP is opened. This would result in only an incremental increase of new residents in the city as vacated housing units are occupied, which could result in a small increase of families with school-age children. Overall, impacts associated with public school services would be less than significant.

Other Government Services

Implementation of the LRCP would increase the resident student population in the area. However, this increased population would not generate significant or visible demand for facilities such as libraries, cultural centers, and other public facilities, as many of these services are currently provided by UC Hastings for students, staff, and faculty. Public facilities, such as parks and cultural centers located throughout the city, would be sufficient to accommodate the minor population increase and altered or additional facilities would not be required. Therefore, the impact would be less than significant.

5.15 RECREATION

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐	☐
c) Physically degrade existing recreational resources?	☐	☐	☒	☐	☐

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated? ***Less-than-Significant Impact***

UC Hastings is in an area of the city that has a "high need" for open space, as identified in the San Francisco General Plan Recreation and Open Space Element. High-need areas are defined as those with high population densities, high concentrations of seniors and youth, and lower income populations that are located outside of existing park service areas.[32] Neighborhood parks and recreational facilities in the vicinity of the UC Hastings campus include Civic Center Plaza and Turk and Hyde Mini Park, which are managed by the San Francisco Recreation and Parks District, as well as the United Nations Plaza, which is managed by the San Francisco Department of Public Works.

Development under the LRCP would include an academic building at 333 Golden Gate Avenue, renovating and reconfiguring the 100 McAllister Street building increasing the total number of housing units from 252 to approximately 260 to 350 units, and approximately 400 to 600 units of campus housing at 198 McAllister Street (Variant A) or approximately 525 to 770 units of campus housing at 198 McAllister Street and 50 Hyde Street (Variant B). Common open space and recreational services would be included for UC Hastings students, faculty, and staff. Students, faculty, and staff would have access to the previously described public facilities, and

[32] City of San Francisco. 2014. *General Plan*. Recreation and Open Space Element, Map 7. April.

numerous additional public parks and recreational areas throughout the city would also be available to UC Hastings students, faculty, and staff.

Although development of campus housing under the LRCP would cause an increase in population in the UC Hastings campus area, the number of new residents would not be large enough so as to substantially increase demand on public recreational facilities in the vicinity or the citywide region, and therefore, would not cause or accelerate deterioration of public parks and recreational facilities. Therefore, the LRCP would have a less than significant effect on the use and deterioration of public parks and recreational facilities.

b) Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? *Less-than-Significant Impact*

The LRCP would include developing and upgrading UC Hastings facilities. Students and staff would have access to recreational facilities at UC Hastings including the fitness center and basketball court located in the 100 McAllister Street Tower, as well as other facilities in the vicinity (described previously), and throughout the city. Therefore, the LRCP would not require construction of new public recreational facilities or the expansion of existing facilities, no related adverse physical impacts would occur, and the impact would be less than significant.

c) Would the project physically degrade existing recreational resources? *Less-than-Significant Impact*

Development under the LRCP would increase the population in the area. As noted previously, existing or new UC Hastings or existing public recreational facilities would serve this population. The population increase would not be substantial enough to cause degradation of existing public facilities. Therefore, implementation of the LRCP would not physically degrade existing recreational facilities and the impact would be less than significant.

5.16 TRANSPORTATION AND CIRCULATION

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☒	☐	☐	☐	☐
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☒	☐	☐	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☐	☐	☐	☒	☐
e) Result in inadequate emergency access?	☒	☐	☐	☐	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☒	☐	☐	☐	☐

a, b, e, f) Would the project conflict with any applicable traffic, transportation, congestion management, or public transit, bicycle, or pedestrian facilities plans or policies; or result in inadequate emergency access? ***Potentially Significant Impact***

The UC Hastings campus is located in the downtown Civic Center neighborhood of San Francisco and is well served by multimodal transportation services in the area. Implementation of the LRCP would increase the population in the area through the development of additional campus housing. This population increase and campus development could potentially impact existing transportation conditions in the area, and therefore, the EIR will analyze these topics.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks? ***Not Applicable***

Implementation of the LRCP would not change existing air traffic volumes or affect existing air traffic patterns in a way that would result in substantial safety risks. Therefore, no further study of air traffic patterns is necessary, and topic (c) will not be addressed in the EIR.

d) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses? ***No Impact***

While the LRCP would include development of select UC Hastings campus sites, no modifications of existing roadways or transportation systems would occur. Therefore, no new or increased hazards would occur, and no impacts due to a hazardous design feature would result. The LRCP would include primarily academic and campus housing uses. Those uses would be consistent with existing UC Hastings activities, and would not create transportation hazards due to incompatible uses.

5.17 UTILITIES AND SERVICE SYSTEMS

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

a) Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board? *Less-than-Significant Impact*

The UC Hastings area is served by San Francisco's combined sewer system. The sewer system is designed to collect and treat sanitary sewage and rainwater runoff in the same treatment plants. Wastewater treatment for the east side of the city is provided primarily by the Southeast Water Pollution Control Plant. Project-related wastewater and stormwater would be treated according to standards contained in the city's NPDES permit. The NPDES standards are set and regulated by the RWQCB, and therefore, would not conflict with other RWQCB requirements.

Development under the LRCP would include an approximately 57,000-gsf academic building at 333 Golden Gate Avenue, renovating and reconfiguring the 100 McAllister Street building increasing the total number of housing units from 252 to approximately 260 to 350 units, and approximately 400 to 600 units of campus housing at 198 McAllister Street (Variant A) or approximately 525 to 770 units of campus housing at 198 McAllister Street and 50 Hyde Street (Variant B). Development under the LRCP would incrementally increase wastewater flows due to an increase in the resident population; however, development under the LRCP would incorporate water-efficient fixtures, as required by Title 24 of the California Code of Regulations. Compliance with these regulations would reduce wastewater flows and the amount of potable water used for building functions.

Construction activities associated with the LRCP could require dewatering, depending on the depth of excavation required at individual development sites, increasing groundwater discharge, which has the potential to enter the city’s combined sewer system. However, as previously described in Section 5.8, Hazards and Hazardous Materials, implementation of Mitigation Measure M-HZ-3, Preparation of a Stormwater Pollution Prevention Plan, including BMPs, would minimize the potential for pollutants to migrate off site and enter the city’s combined sewer and stormwater system, which would reduce the potential for impacts related to runoff water to a less-than-significant level. Furthermore, construction activities would be short term in nature, and any potential wastewater discharge would be temporary.

UC Hastings is within the urbanized environment of downtown San Francisco, which is predominantly developed and covered with impervious surfaces. Development under the LRCP would not change impervious surface conditions and would be required to meet the standards for stormwater management identified in Title 24 of the California Code of Regulations. UC Hastings maintains a demonstration garden at 333 Golden Gate Avenue; however, the property is paved and vegetation is maintained in aboveground planter boxes. Removing the planter boxes would not alter stormwater drainage from the campus. Adherence to Title 24 of the California Code of Regulations and other stormwater management practices would reduce the total stormwater runoff volume and peak stormwater runoff rate through the use of low-impact design approaches (e.g., landscape solutions designed to capture rainwater, such as vegetated roof areas). Wastewater and stormwater generated by development under the LRCP would be treated according to standards contained in the city’s NPDES permit. The NPDES standards are set and regulated by the RWQCB, and thus, would not conflict with RWQCB requirements. Therefore, while proposed future development under the LRCP may incrementally increase stormwater and wastewater flows, wastewater treatment requirements would not be exceeded, and the impact would be less than significant.

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? *Less-than-Significant Impact*

As described previously, the LRCP would include development that would minimally increase demand on San Francisco's combined stormwater and wastewater sewer system, and the associated Southeast Water Pollution Control Plant. Development under the LRCP would not have a significant or noticeable effect on these existing systems. The San Francisco Public Utilities Commission (SFPUC) infrastructure capacity plans account for projected population and employment growth in the city, and thus, the UC Hastings campus would be served by existing water facilities with sufficient capacity to handle the slight demand increase under the LRCP. As noted previously, any incremental increase in wastewater generated would be treated according to standards contained in San Francisco's NPDES permit, the standards for which are set and regulated by the RWQCB, and therefore, would not conflict with RWQCB requirements. Furthermore, during construction activities, implementation of Mitigation Measure M-HZ-3, Preparation of a Stormwater Pollution Prevention Plan, including BMPs, would minimize the potential for pollutants to migrate off site and enter the city's combined sewer and stormwater system, requiring treatment at the city's Southeast Water Pollution Control Plant. Therefore, the addition or expansion of water or wastewater facilities would not be necessary, and a less-than-significant impact would result.

c) Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects? *Less-than-Significant Impact*

As described previously, the proposed LRCP would include development that would minimally increase demand on San Francisco's combined stormwater and wastewater sewer system, and the Southeast Water Pollution Control Plant. However, the UC Hastings area is essentially completely developed and covered primarily with impervious surfaces, and implementation of the LRCP would not substantially alter or add to the amount of impervious surfaces currently contributing stormwater runoff in the area. As previously discussed, the SFPUC's infrastructure has planned capacity to account for projected population and employment increases, the existing system would have sufficient capacity to accommodate development under the LRCP, and the LRCP would not have a significant or noticeable effect on stormwater drainage. Furthermore, low-impact design features would be incorporated, in accordance with Title 24 of the California Code of Regulations, to minimize the amount of stormwater runoff to the extent possible. Therefore, the addition or expansion of stormwater facilities would not be necessary, and a less-than-significant impact would result.

d) Would the project have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements? *Less-than-Significant Impact*

Under the Water Supply Assessment (WSA) law (Sections 10910 through 10915 of the California Water Code), cities and counties are required to obtain an assessment of certain large-scale projects from a regional or local water agency to determine the availability of a long-term water supply sufficient to satisfy project-generated water demand. A WSA is required if a proposed project is subject to CEQA, requiring an EIR or Negative Declaration, and includes any of the following: (1) a residential development of more than 500 dwelling units; (2) a shopping center or business employing more than 1,000 persons or having more than 500,000 sf of floor space; (3) a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space; (4) a hotel or motel with more than 500 rooms; (5) an industrial or manufacturing establishment housing more than 1,000 persons or having more than 650,000 sf or 40 acres; (6) a mixed-use project containing any of the foregoing; or (7) any other project that would have water demand at least equal to a 500-dwelling-unit project.

The San Francisco Public Utilities Commission (SFPUC) provides water service in San Francisco, including the UC Hastings campus. Urban water suppliers like the SFPUC must furnish a WSA to the city or county that has jurisdiction to approve the environmental documentation for certain qualifying projects (as defined in California Water Code Section 10912 [a]) subject to CEQA. UC Hastings, as the Lead Agency under CEQA, is not a city or county and is not subject to the WSA law. As noted in the following paragraphs, the SFPUC can meet the current and future water demand in years of average or above-average precipitation. It can also meet future water demand in single dry-year and multiple dry-year events, with the exception of 2015. With the SFPUC Water Shortage Allocation Plan in place, and the addition of local supplies developed under the SFPUC Water System Improvement Program, the SFPUC has concluded that it has sufficient water available to serve existing customers and planned future uses.[33]

Potential development under the LRCP—including construction of an approximately 57,000-gsf academic building at 333 Golden Gate Avenue, renovating and reconfiguring the 100 McAllister Street building increasing the total number of housing units from 252 to approximately 260 to 350 units, and approximately 400 to 600 units of campus housing at 198 McAllister Street (Variant A) or 525 to 770 units of campus housing at 198 McAllister Street and 50 Hyde Street (Variant B)—would incrementally increase the amount of water required to serve the UC Hastings area. However, this increase would not be substantial and the SFPUC would have sufficient available resources to serve the additional demand. Furthermore, proposed LRCP development would be designed with water-conserving measures identified in Title 24 of the California Code of Regulations, such as low-flush restroom fixtures, thus reducing additional

[33] SFPUC 2013. 2013 *Water Availability Study for the City and County of San Francisco*.

water demand. Future campus housing projects under the LRCP that would develop 500 or more units could conduct site-specific water supply assessments at that time. However, the SFPUC projects sufficient water capacity after 2016, such that no new water facilities are anticipated to be required, and all applicable regulations and management practices related to water conservation would be implemented. Therefore, implementation of the LRCP would not require new water delivery facilities or systems; the SFPUC water supply is sufficient to meet demands and the impact would be less than significant.

e) Would the project result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments? *Less-than-Significant Impact*

Wastewater generated by potential development under the LRCP would enter the city's combined wastewater and stormwater sewer system, and would flow to the Southeast Water Pollution Control Plant for treatment prior to discharge into the San Francisco Bay. The UC Hastings campus is already served by these municipal systems, and a relatively slight increase in population and facilities contributing wastewater to this system would not constitute a significant and unmanageable increase, as the SFPUC's infrastructure capacity plans account for projected population and employment increases in San Francisco. Wastewater, including an incremental increase under the LRCP, would continue to be treated to the city's NPDES permit standards, which are set and regulated by the RWQCB. Therefore, the LRCP would not conflict with RWQCB requirements, and would have a less-than-significant impact on wastewater treatment facilities.

f) Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs? *Less-than-Significant Impact*

The majority of San Francisco's solid waste that is not recycled is disposed of in the Altamont Landfill. As of March 2013, San Francisco's remaining capacity at the landfill was approximately 1 million tons out of the original 15 million-ton capacity. At current disposal rates, San Francisco's available landfill space under the existing contract will run out in January 2016.[34] According to CalRecycle, the Altamont Landfill is permitted through and has an estimated closure date of January 2025.[35] The San Francisco Department of the Environment has contracted with Recology to transfer waste disposal to the Hay Road Landfill in Solano County

[34] San Francisco Department of the Environment. Zero Waste FAQ. Online: http://www.sfenvironment.org/zero-waste/overview/zero-waste-faq. Accessed on November 2, 2015.

[35] CalRecycle. 2015. Active Landfills Profile for Altamont Landfill and Resource Recv'ry (01-AA-0009). Online: http://www.calrecycle.ca.gov/SWFacilities/Directory/01-AA-0009/Detail/. Accessed on November 2, 2015.

once the Altamont Landfill has reached capacity.[36] The Hay Road Landfill has a remaining capacity of approximately 30,433,000 cubic yards, and is permitted until January 1, 2077.[37]

Development under the LRCP would contribute waste to the Altamont Landfill's remaining capacity, and would contribute to the future diversion of solid waste to the Hay Road Landfill. However, students and employees would participate in the city's recycling and composting program, as UC Hastings currently does, and the anticipated amount of additional solid waste generated would not be significantly more than the current amounts generated. Any construction waste generated would be recycled to the extent feasible, and landfills would have sufficient capacity to accept remaining debris. Therefore, the contracted landfills would be able to accommodate any increase in solid waste resulting from implementation of the LRCP, and the LRCP would have a less-than-significant impact on solid waste facilities.

g) Would the project comply with federal, state, and local statutes and regulations related to solid waste? *Less-than-Significant Impact*

As described previously, San Francisco's solid waste that is not recycled is currently disposed of at the Altamont Landfill. The Altamont Landfill is managed by CalRecycle under California Code of Regulations Title 14, Division 7.[38] UC Hastings currently contributes solid waste to the Altamont Landfill through the City of San Francisco, and thus, complies with applicable state statutes, and would continue to comply with applicable regulations under the LRCP. Once capacity is reached at the Altamont Landfill, UC Hastings would transfer disposal of solid waste to the Hay Road Landfill, which would also comply with regulations under Title 14 of the California Code of Regulations. As previously stated, UC Hastings would divert recyclable and compostable debris from construction, demolition, and operation under the LRCP to the extent feasible. All other applicable federal statutes and regulations related to solid waste would also be followed. Therefore, the impact of the LRCP on solid waste would be less than significant.

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[36] San Francisco Planning Department. 2015. *Final Negative Declaration, Agreement for Disposal of San Francisco Municipal Solid Waste at Recology Hay Road Landfill in Solano County*. July 20, 2015. Online: http://sfmea.sfplanning.org/2014.0653E_Revised_FND.pdf. Accessed on November 2, 2015.

[37] CalRecycle. 2015. Facility/Site Summary Details: Recology Hay Road (48-AA-0002). Online: http://www.calrecycle.ca.gov/SWFacilities/Directory/48-AA-0002/Detail/. Accessed on November 2, 2015.

[38] California Office of Administrative Law. 2015. Title 14. Natural Resources. Division 7. Department of Resources and Recycling. Online: https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=IFF17BBCC72F5412C8FEEF78290C1526E&originationContext=documenttoc&transitionType=Default&contextData=(sc.Default). Accessed on November 30, 2015.

5.18 WIND AND SHADOW

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Alter wind in a manner that substantially affects public areas?	☒	☐	☐	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☒	☐	☐	☐	☐

a) Would the project alter wind in a manner that substantially affects public areas? ***Potentially Significant Impact***

In San Francisco, wind conditions at the street level and in public open spaces can affect pedestrian comfort. Winds from 4 to 8 miles-per-hour (mph) are felt on the face. Winds from 8 to 13 mph disturb hair, cause clothing to flap, and extend a light flag mounted on a pole. Winds from 13 to 19 mph raise loose paper, dust, and dry soil, and disarrange hair. Wind conditions can also affect pedestrian safety. Under certain wind conditions and directions, times of year, and a local environment of taller buildings (greater than 80 to 100 feet in height), ground-level wind speeds of 26 mph or above can occur, and walking or maintaining balance can be difficult. On east-west streets with taller buildings, wind funneling can accelerate prevailing winds, affect pedestrian comfort levels, and, in some cases, increase the occurrence of 26 mph or greater wind speeds. A wind speed of 26 mph or greater would be considered a hazardous condition.

In general, new buildings less than approximately 80 feet in height are unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would be uncomfortable. Such winds may exist under existing conditions, but shorter buildings typically do not cause substantial changes in ground-level winds.

New development under the LRCP at 333 Golden Gate Avenue would be up to 90 feet in height, and at 198 McAllister Street and/or 50 Hyde Street under Variants A and B would include buildings up to 140 feet in height. That development could affect pedestrian-level wind conditions.

These potential impacts will be evaluated in the EIR. The wind analysis will use the hazard criterion to determine significant effects under CEQA. In addition, the effects related to the comfort criterion will be presented for informational purposes.

b) Would the project create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas? ***Potentially Significant Impact***

Sun and shade conditions in San Francisco affect public use of open space. In the UC Hastings vicinity, Civic Center Plaza, approximately one block west, and Turk-Hyde Mini Park, approximately one block north, are under San Francisco Recreation and Park Department jurisdiction. United Nations Plaza, which is under San Francisco Department of Public Works jurisdiction, occupies parts of several blocks to the south. Development under the LRCP would potentially add shade to those public open places. The EIR will evaluate whether new shadow would substantially affect those public open spaces.

5.19 MANDATORY FINDINGS OF SIGNIFICANCE

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact	Not Applicable
Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐	☐
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐	☐
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐	☐

The EIR will evaluate potential impacts, including cumulative impacts, related to air quality, cultural resources, geology and soils, GHG emissions, land use and planning, noise, transportation and circulation, and wind and shadow.

6. MITIGATION MEASURES

The following mitigation measures and are necessary to avoid potential significant impacts related to implementation of the LRCP:

Mitigation Measure M-GS-1: Development of an Erosion and Sediment Control Plan

Prior to any grading or excavation activities, UC Hastings shall develop an Erosion and Sediment Control Plan (Plan) to prevent or reduce erosion and the loss of topsoil from development sites on the UC Hastings Campus. The Plan shall incorporate and rely upon best management practices listed in the Association of Bay Area Governments (ABAG) *Manual of Standards for Erosion and Sediment Control Measures*. The Plan shall include, but not be limited to:

- a narrative briefly describing the proposed ground-disturbing activities, existing site conditions and critical areas, adjacent areas, project timeline, measures to control erosion and sedimentation, and maintenance programs;
- a map showing existing contours, activity limits, final contours, existing vegetation and critical areas, soil classifications, and location of control measures; and
- plan details, including drawings of control structures, design assumptions, and specification and maintenance notes.

Mitigation Measure M-GS-2: Paleontological Resource Accidental Discovery

The following measures shall be undertaken to avoid any significant potential future project-related adverse effect on paleontological resources.

- Before the start of any earthmoving activities, UC Hastings shall retain a qualified paleontologist to train all construction personnel, including the site superintendent, involved with earthmoving activities. The training shall include the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils be encountered.
- If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work near the find, and notify UC Hastings. A qualified paleontologist shall be retained to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines.[39] The recovery plan may include a field survey, construction monitoring,

[39] Society of Vertebrate Paleontology. 1996. *Conditions of Receivership for Paleontologic Salvage Collections (final draft)*. Society of Vertebrate Paleontology News Bulletin 166:31-32.

sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.

Mitigation Measure M-HZ-1: Phase II Subsurface Investigation and Remediation

Prior to any development activities, UC Hastings shall conduct a Phase II investigation of subsurface soils, and clearly identify and characterize contaminants of concern (COC) present at development sites. Subsurface investigations shall also define the extent of impacted soils and include recommendations for the limits of removal necessary to achieve compliance with California Regional Screening Levels for residential and mixed-use developments. If determined necessary, UC Hastings shall prepare remedial action plans to properly remove and dispose of materials containing COCs at an appropriately permitted facility, in compliance with Division 20, Chapter 6.5 of the California Health and Safety Code, and with California Highway Patrol and California Department of Transportation regulations.

Mitigation Measure M-HZ-2: Hazardous Building Materials Abatement

UC Hastings shall ensure that any portion of the structure planned for demolition or renovation is surveyed for hazardous building materials including, lead, asbestos containing materials, polychlorinated biphenyls (PCB)-containing electrical equipment, fluorescent light ballasts containing PCBs or bis (2-ethylhexyl) phthalate (DEHP), and fluorescent light tubes containing mercury vapors. These materials shall be removed and properly disposed of prior to the start of demolition or renovation. Light ballasts that are proposed to be removed during renovation shall be evaluated for the presence of PCBs; if the presence of PCBs in the light ballasts cannot be verified, it shall be assumed that they contain PCBs, and shall be handled and disposed of as such, according to applicable laws and regulations. Any other hazardous building materials identified either before or during demolition or renovation shall be abated according to federal and state laws and regulations.

Mitigation Measure M-HZ-3: Preparation of a Stormwater Pollution Prevention Plan

UC Hastings shall prepare and implement, or shall cause to be prepared and implemented, a Stormwater Pollution Prevention Plan (SWPPP) to prevent or minimize the discharge of pollutants and other sediments to San Francisco's combined stormwater and wastewater sewer system. The SWPPP shall incorporate and rely upon Best

Management Practices (BMPs) identified in Section A of the Construction General Permit (Order No. 2009-009-DWQ) of the State Water Resources Control Board.

The SWPPP shall contain, but not be limited to, a site map(s) that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project. The SWPPP shall list BMPs the project contractor would use to protect stormwater runoff, and the placement of those BMPs. Additionally, the SWPPP shall contain a visual monitoring program and chemical monitoring program for "non-visible" pollutants, to be implemented if there is a failure of BMPs.

7. INITIAL STUDY PREPARERS

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