

CHAPTER 6

Alternatives

A. Introduction

In accordance with California Environmental Quality Act (CEQA) *Guidelines* Section 15126.6(a), an environmental impact report (EIR) must describe a reasonable range of alternatives that would reduce or eliminate significant impacts of the project. The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (CEQA *Guidelines* Section 15126.6(f)).

A reasonable range of alternatives for comparison must include those alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project (CEQA *Guidelines* Section 15126.6). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. The following may also be taken into consideration when assessing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (CEQA *Guidelines* Section 15126.6(f)(1)). The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. (CEQA *Guidelines* Section 15126.6(c)).

CEQA also requires that a No Project Alternative be evaluated, with its impacts, as part of the EIR (CEQA *Guidelines* Section 15126.6(e)). Additionally, the CEQA *Guidelines* (Section 15126.6(e)(2)) require that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the fewest adverse environmental impacts on the project site and surrounding area. If the No Project Alternative is found to be the environmentally superior alternative, then the EIR must identify an environmentally superior alternative among the other alternatives.

CEQA *Guidelines* Section 15126.6(c) requires an EIR to identify and briefly discuss any alternatives that were considered by the Lead Agency but were rejected as infeasible during the scoping process.

This chapter identifies alternatives to the Proposed Project and discusses environmental impacts associated with each alternative. City decision-makers could adopt an alternative instead of approving the Proposed Project if that alternative would substantially reduce or eliminate significant environmental impacts identified for the Proposed Project, the alternative is determined feasible, and the alternative

would achieve most of the Proposed Project objectives. The determination of feasibility would be made by City decision-makers based on substantial evidence in the record, which shall include, but would not be limited to, information presented in the Draft EIR and comments received on it.

B. Proposed Project Alternatives Analysis

In an effort to develop a reasonable range of alternatives, this section first presents the Proposed Project's objectives (from Chapter 2, Project Description) and then summarizes the significant environmental impacts of the Proposed Project that were identified in Chapter 4, Environmental Setting and Impacts. The alternative approaches and strategies that would substantially lessen or avoid significant impacts are described, and then the feasibility of an alternative's strategies and its ability to meet project objectives are discussed.

Project Sponsor's Objectives

Western SoMa Community Plan

The project objectives for the Draft Plan are the following:

- Mitigate to the fullest extent possible neighborhood impacts resulting from new development;
- Stabilize the neighborhood against speculative land use proposals and developments;
- Promote safety in all areas of the public realm (e.g., streets, sidewalks, parks, etc.);
- Maintain and encourage the existing community cultural diversity;
- Proposed new land use development shall primarily serve the needs of existing residents and businesses. Citywide and regional needs are subordinate to existing local needs;
- Maintain and promote diversity (e.g., day/night, living/working, spectrum of uses, etc.) of neighborhood land uses;
- Provide clear and simple community planning policies and zoning recommendations;
- Generally maintain the existing scale and density of the neighborhood;
- Promote environmental sensitivity in new development projects;
- Encourage nurturing characteristics and maximize opportunities for seniors, families, youth and children;
- Develop and maintain local accountability and monitoring mechanism;
- Provide periodic reassessment of the community plan; and
- Maximize general environmental quality and health.

Rezoning of Adjacent Parcels

The project objectives for the Rezoning of Adjacent Parcels are the following:

- Rezone 46 parcels, comprising 35 lots,¹ adjacent to the *Western SoMa Community Plan Area*, which are not currently part of any area plan (proposed or adopted), but whose proximity to both the proposed Western SoMa Special Use District (SUD) and Eastern Neighborhoods² make them ideal candidates for “clean-up” rezoning;
- Promote land use types envisioned within this part of the city by rezoning these parcels from Heavy Commercial (C-M) and Service/Light Industrial/Residential (SLR) to downtown General Commercial (C-3-G) and Eastern Neighborhoods Mixed Use Office (MUO); and
- Encourage existing building heights and massing by preserving existing height and bulk limits.

350 Eighth Street Project

The project objectives for the 350 Eighth Street project are the following:

- Redevelop a large parking lot that does not currently contribute to the economic, social, and aesthetic qualities of the neighborhood;
- Create an apartment community that respects the neighborhood and context in which it is being built;
- Embrace and extend the existing network of alleys that connects Western SoMa by revitalizing the look and feel of Gordon and Ringold Streets adjacent to the 350 Eighth Street project site;
- Bring activity to the neighborhood through viable ground-floor commercial, art-related, and light industrial uses; and
- Develop a feasible project capable of providing an adequate return on investment.

Significant Environmental Impacts

As stated in the CEQA Guidelines, alternatives to a project must substantially lessen or avoid one or more of the significant environmental impacts associated with the project. The following section summarizes the significant impacts of the Proposed Project; these significant impacts provided the basis for the development of alternatives to the Proposed Project. There are two groups of significant impacts identified in this EIR: (1) significant and unavoidable impacts, which include impacts that would be significant and unavoidable with mitigation measures incorporated, and (2) significant impacts that can be mitigated to a less-than-significant level.

¹ One lot has been subdivided as part of a residential condominium project. The term “lot” refers to a tract of developable land, whereas the term “parcel” refers to developed individual units that have access to sewer, water and electricity services (i.e., condominium units).

² Eastern Neighborhoods include the East SoMa, Mission, and Showplace Square/Potrero Hill areas, which border Western SoMa to the east, south, and southeast, respectively. Central Waterfront, located farther southeast, is also part of the Eastern Neighborhoods. See Section C. Background below for additional information.

Significant and Unavoidable Impacts

- Cultural Resources.** As discussed in Section 4.D, Cultural and Paleontological Resources, the development under the Draft Plan and Rezoning of Adjacent Parcels could indirectly result in demolition of individual historical resources or contributing resources to a potential historic district located in the Project Area, causing a project-specific and cumulative substantial adverse change in the significance of a historical resource (Impacts CP-1 and C-CP-1). Although implementation of Mitigation Measures M-CP-1a through M-CP-1c would reduce these impacts, they would remain significant and unavoidable, for the Draft Plan and Rezoning of Adjacent Parcels, on project-specific and cumulative levels.
- Transportation and Circulation.** As discussed in Section 4.E, Transportation and Circulation, the Draft Plan would cause levels of service at the intersections of Fifth/Bryant/I-80 Eastbound on-ramp, Sixth/Brannan/I-280 ramps, and Eighth/Harrison/I-80 Westbound off-ramp to deteriorate such that it would result in a significant unavoidable impact, under both project-specific and cumulative conditions (Impacts TR-1a, TR-1b, TR-1c, and C-TR-1a). Furthermore, the Draft Plan's proposed transportation system improvements would remove on-street loading spaces along 12th Street that could not be located nearby, which would also result in a significant unavoidable impact (Impact TR-5). Lastly, the Draft Plan, under cumulative conditions, would contribute considerably to exceedance of the capacity utilization standards for Muni (Impact C-TR-2). Mitigation Measures M-TR-1c, M-TR-4, and M-C-TR-2 would reduce some of these impacts, but they would remain significant and unavoidable.
- Noise.** As discussed in Section 4.F, Noise and Vibration, the implementation of the Proposed Project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would result in a significant cumulative noise impact (Impact C-NO). Mitigation Measures M-NO-1a, M-NO-1b, M-NO-1c, and M-NO-1d would reduce this impact for the Draft Plan and Rezoning of Adjacent Parcels, but not below the less-than-significant threshold and it would remain significant and unavoidable. (This impact would be less than significant with mitigation for the 350 Eighth Street project.)
- Air Quality.** As discussed in Section 4.G, Air Quality, the implementation of the Draft Plan and Rezoning of Adjacent Parcels (individually and in combination) would violate an air quality standard or contribute to an existing or projected air quality violation (Impact AQ-2); expose existing and future sensitive receptors to substantial concentrations of particulate matter (PM_{2.5}) and toxic air contaminants (TACs) (Impacts AQ-3 and AQ-4); would result in construction-period emissions of criteria air pollutants, including ozone precursors, from subsequent individual development projects that would contribute to an existing or projected air quality violations with respect to criteria air pollutants (Impact AQ-6); and would expose sensitive receptors to substantial levels of construction-period TACs (Impact AQ-7). Furthermore, the construction of the 350 Eighth Street project would expose sensitive receptors to substantial levels of TACs generated by construction equipment (Impact AQ-11). The Proposed Project (although not the proposed transportation improvements or the 350 Eighth Street project) would also contribute considerably to cumulative air quality impacts related to emissions of criteria air pollutants (Impact C-AQ-1) and TACs (Impact C-AQ-2). Although implementation of Mitigation Measures M-AQ-2, M-AQ-3, M-AQ-4, M-AQ-6, M-AQ-7, and M-AQ-11 would reduce these impacts, they would remain significant and unavoidable on project-specific and cumulative levels.
- Shadow.** As discussed in Section 4.I, Wind and Shadow, the implementation of the Draft Plan and Rezoning of Adjacent Parcels, on a project-specific and cumulative level, would create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas, which would result in significant and unavoidable impacts (Impacts WS-3 and C-WS-2).

Significant Impacts That Can be Mitigated to a Less-than-Significant Level

As discussed in various sections of Chapter 4 of the EIR, one or more components of the Proposed Project would result in the following impacts which could be reduced to less-than-significant levels with implementation of mitigation measures indicated in Chapter 4:

- **Cultural Resources.** Impacts associated with change in the significance of an archeological resource that would occur as a result of the implementation of the Draft Plan and Rezoning of Adjacent Parcels (Impact CP-4), and the 350 Eighth Street project (Impact CP-9); impacts associated with substantial damage to historic architectural resources as a result of construction activity that would occur under the Draft Plan and Rezoning of Adjacent Parcels (Impact CP-7). Mitigation Measures M-CP-4a, M-CP-4b, M-CP-7a, M-CP-7b, and M-CP-9 would reduce those impacts to less-than-significant levels.
- **Transportation and Circulation.** Impacts associated with removal of on-street loading spaces along Folsom Streets as a result of the implementation of the Draft Plan (Impact TR-4) as well as impacts associated with unacceptable deterioration of levels of service at local intersections as a result of the 350 Eighth Street project (Impact TR-9). Mitigation Measures M-TR-4 and M-TR-1c would reduce those impacts to less-than-significant levels.
- **Noise and Vibration.** Impacts related to increases in temporary or permanent ambient noise levels or construction-related noise and vibration as a result of the Draft Plan and Rezoning of Adjacent Parcels (Impacts NO-1, NO-2, and NO-3), and the 350 Eighth Street project (Impacts NO-5, NO-6, and NO-7). Mitigation Measures M-NO-1a, M-NO-1b, M-NO-1c, M-NO-1d, M-NO-2a, M-NO-2b, and M-NO-5 would reduce those impacts to less-than-significant levels.
- **Wind.** Impacts associated with alterations to wind patterns in a manner that would substantially affect public areas as a result of the implementation of the Draft Plan and Rezoning of Adjacent Parcels (Impact WS-1). Mitigation Measure M-WS-1 would reduce this impact to a less-than-significant level.
- **Biological Resources.** Impacts on species identified as candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or United States Fish and Wildlife Service, as a result of the implementation of the Draft Plan and Rezoning of Adjacent Parcels (Impact BI-1), and the 350 Eighth Street Project (Impact BI-4). Mitigation Measures M-BI-1a and M-BI-1b would reduce this impact to a less-than-significant level.
- **Hazards and Hazardous Materials.** Impacts associated with accidental releases of mercury or polychlorinated biphenyls as a result of the implementation of the Draft Plan and Rezoning of Adjacent Parcels (Impact HZ-2), and the 350 Eighth Street project (Impact HZ-7) as well as impacts related to exposure of public or the environment to known or newly discovered hazardous materials as a result of a site being located on a hazardous materials list site, as a result of the implementation of the Draft Plan and Rezoning of Adjacent Parcels (Impact HZ-3), and 350 Eighth Street project (Impact HZ-8). Mitigation Measures M-HZ-2, M-HZ-3, M-HZ-8 would reduce these impacts to less-than-significant levels.

Selected Alternatives

In addition to the No Project Alternative, this chapter compares the impacts of two alternatives to the Proposed Project: (1) a Reduced Growth Alternative, including a Reduced Intensity Alternative for the 350 Eighth Street project; and (2) a Greater Growth Alternative. In accordance with CEQA *Guidelines* Section 15126.6(d), the comparison of the impacts of the identified alternatives is intended to be less detailed than the discussion of the impacts of the Proposed Project. The population and housing unit estimates, as well as the map identifying potential growth sites that are included in the description of the Greater Growth Alternative, are based on conceptual-level discussions held during the planning process and may evolve over time. They are not meant to represent detailed development proposals, but instead to provide the public and decision-makers a general basis for comparison among the alternatives.

With the exception of the No Project Alternative, all of the project alternatives would result in some impacts that could not be mitigated to a less-than-significant level. However, each alternative evaluated would also reduce one or more of the identified impacts of the Proposed Project. It is noted that the third alternative, the Greater Growth Alternative, is being explored by the Planning Department to determine whether a more intensive development program could be permitted within the Draft Plan Area and result in reduced environmental effects as compared to the Draft Plan.³

Table 6-1 presents projections for housing units, households, household population, and employment for each of the Alternatives, and compares them to projections under the Proposed Project.

**TABLE 6-1
COMPARISON OF PROJECTIONS BETWEEN PROPOSED PROJECT AND ALTERNATIVES**

	Existing Conditions	Proposed Project	No Project Alternative	Reduced Growth Alternative	Greater Growth Alternative
Housing Units	3,364	6,247	6,038	5,670	6,588
Compared to Proposed Project			-209	-577	341
Households	3,176	5,944	5,743	5,390	6,271
Compared to Proposed Project			-201	-554	327
Household Population	7,000	13,336	12,878	12,069	14,088
Compared to Proposed Project			-458	-1,267	751
Employment	17,655	24,009	22,941	22,738	24,156
Compared to Proposed Project			-1,068	-1,271	147

SOURCE: San Francisco Planning Department, 2012; ESA, 2012.

³ As discussed below, the Greater Growth Alternative does not include an increased development program for the Adjacent Parcels, because the parcels identified for more intensive development are all located within the Plan Area and do not include the Adjacent Parcels.

Alternative 1: No Project Alternative

Description

CEQA *Guidelines* Section 15126.6(e)(3)(A) states that, generally, when a project being analyzed is the revision of an existing land use or regulatory plan—such as the Western SoMa Community Plan and Rezoning of Adjacent Parcels, along with San Francisco Planning Code and Zoning Map revisions that would implement the Draft Plan and Rezoning of Adjacent Parcels—the No Project Alternative should be considered to be continuation of the existing plan into the future. As stated in CEQA Guidelines Section 15126.6(e)(3)(A), “typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed. Thus, the projected impacts of the proposed plan or alternative plans would be compared to the impacts that would occur under the existing plan.”

Consistent with this guidance, the No Project Alternative considered in this EIR is the maintenance of the existing zoning controls in the Project Area, including the Draft Plan Area, the Adjacent Parcels, and the 350 Eighth Street project site. Under this alternative, the San Francisco Planning Department would not implement the Draft Plan or the Rezoning of Adjacent Parcels. No rezoning reclassifications would occur for any portion of the Draft Plan Area or Adjacent Parcels, and the Project Area would remain zoned as under existing conditions. (See Chapter 2, Project Description, for a discussion of current zoning and height and bulk classifications.) This alternative includes what could be reasonably expected to occur in the foreseeable future if these two project components were not approved, based on existing use districts and height and bulk classifications (CEQA *Guidelines* Section 15126.6(e)). Specifically, no increases or decreases in building heights would occur due to height and bulk district reclassifications, and no areawide, systematic density or land use changes would be anticipated. It is noted that the Planning Department’s growth forecast for this alternative, which project less overall employment than with the Proposed Project, also foresee more retail employment under this alternative than with the Proposed Project, but substantially less office employment. (The Adjacent Parcels would remain under the C-M and SLR zoning designations, as under existing conditions.)

Specific private development projects may be proposed in the future on specific parcels throughout the Draft Plan Area and on one or more of the Adjacent Parcels. These would be required to go through the Planning Department review and permitting process, which would include any necessary zoning changes. However, any changes proposed as part of individually proposed projects would be site-specific and would be evaluated for approval by the Planning Department on an individual (i.e., project-specific) basis.

In addition, no area-wide transportation system improvements envisioned by the Draft Plan (along designated streets and intersections) would occur, including installations of signalized pedestrian crossings, installations of sidewalk extensions and corner bulb-outs, installations of gateway treatments, or installations of public realm greening and pedestrian enhancements.

350 Eighth Street Project

Normally the No Project Alternative for an individual development project is “the circumstance under which the project does not proceed” (CEQA *Guidelines* Section 15126.6(e)(3)(B)). Accordingly, a project-specific No Project Alternative for the proposed 350 Eighth Street project would involve no development on the 350 Eighth Street project site. The existing paved lot would remain, although it is assumed that Golden Gate Transit would relocate its midday bus parking to a location beneath the Bay Bridge approach, as this move is planned independently as part of implementation of the new Transit Center project. The No Project Alternative for the 350 Eighth Street project site would not preclude future development of the 350 Eighth Street project site. Any such future project would be subject to its own environmental review under CEQA.

Objectives

The No Project Alternative would not meet most of the project sponsors’ objectives (listed above). For the Draft Plan, for example, it would not provide any community planning policies or zoning recommendations, nor would it implement mechanisms to promote safety in the public realm, including streets, sidewalks, and parks. The No Project Alternative would also not stabilize the neighborhood against speculative land use proposals and developments or systematically promote environmental sensitivity in new development projects. It also would provide no way of ensuring that proposed new land use development would primarily serve the needs of existing residents and businesses, taking precedence over citywide and regional needs. This alternative would meet some project objectives, including general maintenance of existing scale and density of the neighborhood and, to some extent, maintenance of diverse neighborhood land uses.

With respect to the Rezoning of Adjacent Parcels, the objective of making the Adjacent Parcels more consistent with the type of land uses that are envisioned within this part of the city would potentially be less applicable in the absence of the Draft Plan. Nevertheless, the No Project Alternative would not meet this objective with respect to those parcels proposed for rezoning to C-3-G, which would be consistent with existing zoning north of Mission Street and west of 10th Street.

The No Project Alternative would also not meet any of the objectives associated with the 350 Eighth Street project. For example, it would not create an apartment community on the 350 Eighth Street project site or bring activity to the neighborhood through viable ground-floor commercial, art-related, and light industrial uses.

Plan-Level Impacts

Land Use

Under the No Project Alternative, the existing zoning regulations in the Project Area would remain in place. Development proposed for specific parcels, public parcel improvements, and transportation system improvements would occur as allowed by current regulations and would undergo separate reviews by the Planning Department and other regulatory bodies. Residential uses would continue to be permitted as of right within Residential Enclave District (RED), Service/Light Industrial/Residential (SLR),

and Residential Service District (RSD) zones and would be permitted with a Conditional Use (CU) authorization within the Service/Secondary Office (SSO), Service/Light Industrial (SLI), and Heavy Commercial (C-M) use districts. Commercial and/or retail development would be allowed in all districts except for the REDs. Development under the No Project Alternative would not divide or disrupt the Draft Plan Area or the Adjacent Parcels, although some community benefit programs proposed under the Draft Plan likely would not be implemented under this alternative, and the zoning of the Adjacent Parcels would not be reconciled with the existing zoning of the opposing block facades. Although the existing character of the Draft Plan Area may be less cohesive in comparison to what is proposed under the Draft Plan, the Draft Plan Area would be expected to retain its diverse, mixed-use character under the No Project Alternative.

Aesthetics

Under the No Project Alternative, development would be permitted to proceed under the existing zoning (growth forecasts under the No Project Alternative are nearly as great as under the Proposed Project). Thus, impacts to visual resource would be similar to those under the Proposed Project, except that building heights may be slightly higher (or lower) over time. The variety of building types and styles in the Project Area – including residential and commercial, large and small, architecturally ornate and simple structures – would remain, along with the visual character of the larger streets and smaller alleyways. In this sense, the No Project Alternative would not differ from the Proposed Project, which would also retain the building types and visual character of the Project Area. Furthermore, any changes to view corridors that would occur under the No Project Alternative would also be similar to what is expected under the Proposed Project over time, although, as stated above, within portions of the Project Area, building heights could be increased or reduced by different amounts, as compared to the Proposed Project. However, under this alternative, no guidelines or unifying goals and objectives would be adopted for the Draft Plan Area that could result in more consistent patterns of development in the future. Moreover, no package of streetscape improvements (considered a beneficial impact) would occur throughout the Draft Plan Area, although some minor improvements could be carried out on an individual basis. The Adjacent Parcels would continue to be developed over time, but only as permitted under the existing zoning designations. Nevertheless, aesthetic effects would be less than significant for all project components, as with the Proposed Project.

Population and Housing

By 2030, assuming the Proposed Project was not implemented, the number of residents within the Project Area would be about 12,900, approximately 460 less than projected under the Proposed Project, in approximately 5,740 households (about 200 fewer than with the Proposed Project). Similarly, the number of employees would be about 22,950, approximately 1,070 less than projected under the Proposed Project. Effects related to population and housing would be less than significant, as with the Proposed Project. Similar to the Proposed Project, the population, housing and jobs that would be attributable to the Adjacent Parcels would be a small percentage of what is assumed for the Project Area as a whole. However, as discussed in Section 4.C, Population and Housing, it is not possible to isolate those numbers for this analysis, since Adjacent Parcels are within the same Traffic Analysis Zones (TAZs) as the Draft Plan Area, and the TAZ is the forecasting unit.

Cultural and Paleontological Resources

Unlike the Proposed Project, the No Project Alternative would not provide any incentive for future development in the form of new use districts and increased height limits. Therefore, effects on historical resources would be less substantial than those under the Proposed Project. However, as with the Draft Plan and the Rezoning of Adjacent Parcels, individual projects implemented in the future under existing land use controls could result in demolition or substantial alteration of historical resources, both within the Draft Plan Area and on Adjacent Parcels. Therefore, impacts on historical resources under the No Project Alternative would be **significant and unavoidable**, as with the Proposed Project.

The No Project Alternative has the potential to result in significant impact with respect to archeological resources, because individual development projects could proceed under this alternative and could result in disturbance of archeological resources. However, because comparable mitigation measures to those identified in Chapter 4 would be applied individually as projects are proposed, this impact would be reduced to a less-than-significant level, similar to the Proposed Project. As with the Proposed Project, effects on paleontological resources would be less than significant.

Transportation and Circulation

Under the No Project Alternative, effects related to the intensity of development would be similar to those of the Proposed Project because, while the No Project Alternative would have less employment-generating development and fewer residential units added within the Draft Plan Area and on Adjacent Parcels than would be the case with the Proposed Project, the different mix of anticipated future land uses would not result in a commensurate decrease in trip generation. The assumed greater amount of retail space and lesser amount of office space under the No Project Alternative, as described above, would result in about 5 percent greater daily and peak-hour trip generation with the No Project Alternative, compared to the Proposed Project. However, the number of peak-hour vehicle trips would vary by less than 1 percent from that with the Proposed Project, meaning that intersection level of service conditions would be very similar to those with the Proposed Project. Therefore, the No Project Alternative would result in degraded level of service (LOS) at the same three intersections as under the Proposed Project: Fifth/Bryant/I-80 Eastbound on-ramp (p.m. peak hour), Eighth/Harrison/I-80 Westbound off-ramp (p.m. peak hour), and Sixth/Brannan/I-280 ramps (a.m. and p.m. peak hour). Thus, the No Project Alternative would not avoid the Proposed Project's **significant and unavoidable impacts** on LOS at these intersections.

Peak-hour transit ridership would be about 2 percent greater under the No Project Alternative than under the Proposed Project, and effects would be similar to those of the Proposed Project, and would be **significant and unavoidable** under cumulative conditions, as with the Proposed Project.

Pedestrian and bicycle operations would not be markedly different under the No Project Alternative from those with implementation of the Proposed Project, and impacts would be less than significant.

The No Project Alternative would not implement public realm and transportation system improvements proposed as part of the Draft Plan, such as widened sidewalks/bulb-outs, the addition of mid-block signalized crosswalks, truck route signage, the installation of traffic calming features, or the creation of

“gateway” treatments. Accordingly, the No Project Alternative would avoid the Proposed Project’s significant loading impact due to the removal of on-street loading spaces on 12th Street.

Noise and Vibration

Although incrementally less development would be anticipated under the No Project Alternative, construction of specific projects allowed under existing regulations would continue, both within the Draft Plan Area and on Adjacent Parcels. Construction related to the No Project Alternative would be expected to expose persons to or generate noise levels in excess of City standards, as with the Proposed Project. However, as with the Proposed Project, these effects would be less than significant with mitigation identified in Chapter 4. Traffic noise levels would be incrementally less under cumulative conditions than what was identified for the Proposed Project specifically because the No Project Alternative would not designate certain street segments as truck routes, as under the Proposed Project. This component constitutes a major contributor to the cumulative noise environment on street segments where such changes are proposed. Based on these, this alternative would reduce the Proposed Project’s significant and unavoidable cumulative noise impact to a less-than-significant level.

Air Quality

The relative increase in vehicle trip generation under the No Project Alternative would incrementally increase emissions of criteria air pollutants from traffic. However, these impacts would be less than significant, as with the Proposed Project. However, construction-related air quality emissions of both criteria air pollutants and toxic air contaminants (TACs) from development that could occur under the No Project Alternative would result in a **significant and unavoidable impact**, as with the Proposed Project, because, depending on construction schedules of individual projects, diesel-powered construction equipment that operates with emissions levels low enough to avoid exceeding the air quality thresholds of significance may not be available, at least during the next several years. Exposure of sensitive receptors (existing and future residential areas, along with child care centers) to TACs from existing and future stationary sources (mostly backup generators, gasoline stations, and auto repair facilities) would also result in a **significant and unavoidable impact**, as with the Proposed Project. Lastly, similar to the Proposed Project, the No Project Alternative would result in **significant and unavoidable** cumulative air quality impacts from emissions of criteria air pollutants and exposure of sensitive receptors to substantial levels of TACs. These would be incrementally increased as compared to the Proposed Project due to the increase in vehicle trip generation.

Greenhouse Gas Emissions

With incrementally more vehicular traffic, the No Project Alternative would result in slightly greater greenhouse gas emissions than would the Proposed Project. Effects would be less than significant, as with the Proposed Project.

Wind and Shadow

As under the Proposed Project, buildings under the No Project Alternative would generally be less than 80 feet tall and would therefore be unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would experience discomfort. As is standard citywide procedure, specific projects proposed under the No Project Alternative, either in the Draft Plan Area or on Adjacent Parcels, would likewise be required to undertake design modifications to reduce any potential wind impacts, if necessary. Therefore, wind impacts would be less than significant with mitigation, as under the Proposed Project. Regarding potential shadow impacts on neighborhood parks and recreational facilities, all future development be subject to review by the Planning Department and could be adjusted with respect to height and bulk to minimize shadow impacts. However, as with the Proposed Project, shadow impacts would be **significant and unavoidable** because it cannot be stated with certainty that shadow would not adversely affect parks and open spaces.

Biological Resources

Development under the No Project Alternative would also occur in a developed urban area with limited existing natural resources. Effects on biological resources would likely be similar in nature to, but somewhat less substantial in magnitude than, those resulting from implementation of the Proposed Project, and this would be the case both in the Draft Plan Area and on Adjacent Parcels. While the No Project Alternative would not permit buildings as tall as those that would be allowed under the Proposed Project (specifically, the Draft Plan component), as described in Section 4.L, Biological Resources, the lower stories of highly glazed buildings tend to result in the greatest risk of bird strikes because reflections of attractive ground-level features like vegetation can confuse birds and result in collisions. Therefore, effects related to bird strikes would be similar to those of the Proposed Project. This impact, however, would be rendered less than significant by compliance with Planning Code Section 139 and the City's *Standards for Bird-Safe Buildings*, and other effects on biological resources could be reduced to a less-than-significant level through implementation of mitigation measures identified in the EIR. For these reasons, as with the Proposed Project, effects on biological resources would be less than significant with mitigation.

Recreation

The No Project Alternative would result in an increased number of permanent residents in the Project Area that could potentially result in the use of existing parks and recreational facilities such that physical deterioration would occur or be accelerated. Even though no new parks are included in the Proposed Project, the Draft Plan does include the goal of providing at least one new public park or open space area serving Western SoMa. The Draft Plan also discusses the need for funding mechanisms to both maintain existing parks as well as to acquire sites for future parks. Whether such a new park would be constructed under the No Project Alternative is dependent to a certain degree on the City's current evaluation of open space needs as part of the Open Space 2100 project and the update of the *San Francisco General Plan's* Recreation and Open Space Element (ROSE). Other non-traditional open space improvements described in the Draft Plan, such as upgrades to the pedestrian and bicycle network, would not occur in a systematic manner under the No Project Alternative. The Rezoning of Adjacent Parcels does not include policies for creation of new parks or open spaces, but would permit new housing units within this portion of the Project

Area. However, as with the Proposed Project, impacts related to recreation would be less than significant for the No Project Alternative, both within the Draft Plan Area and on Adjacent Parcels.

Public Services, Utilities, and Service Systems

This alternative would incrementally increase the demand for public services and utilities within the Project Area. However, the population and employment increase in the Project Area anticipated under the No Project Alternative would be slightly less than if the Proposed Project were implemented. Therefore, the No Project Alternative, like the Proposed Project, would have a less-than-significant impact on public services and utilities, but the impact would be reduced as compared to the Proposed Project.

Other Effects Related to Site-Specific Conditions

Although less development would be anticipated under the No Project Alternative, construction of specific projects allowed under existing regulations would continue. The No Project Alternative would have less-than-significant impacts regarding water quality, erosion, flooding, and stormwater runoff, similar to the Proposed Project. Also similar to the Proposed Project, the No Project Alternative would have less-than-significant geological impacts resulting from groundshaking, liquefaction, and unstable or expansive soils. Impacts regarding the exposure to hazards and hazardous materials during construction and demolition activities would be less than significant with mitigation, similar to impacts under the Proposed Project. Finally, as under the Proposed Project, there would be less than significant or no impacts on mineral and energy resources or agricultural and forest resources under the No Project Alternative.

350 Eighth Street Impacts

Under the No Project Alternative for 350 Eighth Street project, the proposed development would not be undertaken and none of the impacts resulting from the 350 Eighth Street project, as described in Chapter 4, would occur. The 350 Eighth Street project site would remain paved and in use by Golden Gate Bridge, Highway, and Transportation District as a bus parking and inspection yard, until the bus yard is relocated to a location beneath the Bay Bridge approach, which is assumed to occur in 2013 as part of the new Transit Center, currently under construction. It is possible that another project would be conceived for this site in the near future; any such project would be subject to its own CEQA review at such time as it were proposed. At present, impacts related to such a future proposal are too speculative to predict.

Alternative 2: Reduced Growth Alternative

Description

Under the Reduced Growth Alternative, the San Francisco Planning Department would implement a modified version of the Proposed Project, with select modifications that would lessen the development potential in certain areas within the Project Area. As discussed above, the intent of this alternative is to eliminate or reduce significant and unavoidable impacts that would result from the Proposed Project. However, as discussed above, even with the No Project Alternative, some significant and unavoidable impacts would occur (including those related to historical resources, transportation, air quality, and

shadow), owing to anticipated changes that are expected to occur in the Project Area regardless of the Proposed Project or alternative implemented. Therefore, while reducing growth intensity could reduce some of those impacts, most would remain significant and unavoidable. For this reason, it is difficult to set growth reduction targets for this alternative in a way that would eliminate significant and unavoidable impacts.

For purposes of this analysis, however, the Reduced Growth Alternative assumes that about 20 percent fewer housing units and jobs would be created under this alternative than under the Proposed Project. There are several ways in which an areawide reduction in growth can be achieved, although no specific actions are stipulated in this EIR. For example, reduction in development buildout can be achieved by limiting some or all of the height and bulk districts within the Western SoMa Community Plan Area that have variable height limits to those permitted by the base height, such as the Western SoMa Service, Arts, Light Industrial district south of Bryant Street, which has a variable height limit of 40-X/55-X and portions of the Western SoMa Regional Commercial District north of Harrison Street that have a variable height limit of 55-X/65-B. This would reduce building heights by about one story on various parcels that would otherwise be eligible for height increases with CU authorization. A reduction in growth could also be achieved by designating larger areas as RED or RED Mixed zones than are currently proposed by the Draft Plan, or by reducing floor area ratios within the proposed commercial districts (Western SoMa Regional Commercial District [W SoMa RCD] and Folsom Neighborhood Commercial Transit [Folsom NC-T]). These types of zoning changes would lead to overall less intensive development in the Project Area.

Under this alternative, the Rezoning of Adjacent Parcels would be implemented as under the Proposed Project, since no height rezoning is proposed as part of this project component and because rezoning these parcels to districts other than those proposed would not meet the basic objectives of the project. However, this alternative assumes that net 20-percent reduction in housing and jobs could be achieved Project Area-wide.

Based on growth assumptions prepared as part of the transportation impact analysis, the Proposed Project would result in about 209 more housing units and 1,068 more jobs than the No Project Alternative. Therefore, a reduction of 20 percent from the Proposed Project projections would result in 42 fewer housing units and 213 fewer jobs, for a total of 5,670 housing units and 22, 738 jobs under the Reduced Growth Alternative.

The Reduced Growth Alternative would include most of the areawide streetscape and transportation system improvements envisioned by the Draft Plan. Specifically, the following would be implemented:

- Installation of new signalized mid-block crossings on Folsom Street at Rausch Street (between Seventh and Eighth Streets) and mid-block between Eighth and Ninth Streets;
- Installation of new signalized mid-block crossings at Seventh and Minna Streets and Eighth and Natoma Streets;
- Installation of streetscape and traffic calming improvements on Minna, Natoma, and Ringold Streets; and

- Installation of gateway treatments at and in vicinity of freeway off-ramps, potentially including signage, lighting, and physical roadway features such as enhanced hardscape area, landscaped islands, or colored textured pavement.

However, the Reduced Growth Alternative would not post “truck route” signs on Ninth, 10th, Harrison, and Bryant Streets in the Draft Plan Area nor include the public realm greening and pedestrian enhancements along Folsom Street and 12th Street that are proposed under the Draft Plan in order to avoid the Proposed Project’s significant unavoidable impacts related to removal of on-street loading spaces along 12th Street and also to avoid the less than significant with mitigation impacts related to removal of on-street loading spaces along Folsom Street.

350 Eighth Street Project

Under the Reduced Growth Alternative, the 350 Eighth Street project would be reduced in height from 65 feet to 55 feet, and the buildings along the Eighth Street and Harrison Street frontages and in the center of the 350 Eighth Street project site would be five stories plus mezzanine, one story less than under the Proposed Project. About 90 fewer dwelling units would be provided, for a total of 354 units, which would be a 20 percent reduction in unit count as compared to the Proposed Project. The buildings on Gordon and Ringold Streets would also be reduced in height by one story, to four stories plus mezzanine. The building at Gordon and Harrison Streets would be reduced in height to 50 feet, 10 feet shorter than with the project; this building would still have three floors of commercial (office) space over retail, but with lower floor-to-floor heights. The floor area of this building would remain the same as under the Proposed Project.

Objectives

Depending on which policies are implemented to achieve the targeted reduction in growth, it is likely that the Reduced Growth Alternative could still meet many of the project sponsors’ objectives. The same or similar policies to the Draft Plan could be enacted to target different portions of the Project Area for either residential or commercial growth (or a combination), in a way that would achieve the targeted 20-percent reduction in buildout. Therefore, in terms of objectives, the Reduced Growth Alternative could still be enacted to promote community cohesion and mitigate neighborhood impacts of new development, promote safety, promote environmental sustainability, maintain and promote diversity, and improve the public realm, including streets, sidewalks, and parks.

This alternative would meet the project objectives for the Rezoning of Adjacent Parcels, since this component would be implemented as under the Proposed Project. Likewise, it would also meet most of the objectives associated with the 350 Eighth Street project, albeit to a lesser degree than would the Proposed Project.

Plan-Level Impacts

Land Use

Under the Reduced Growth Alternative, most of the proposed rezoning changes would be made, as under the Proposed Project, although some of the bulk and height districts would be revised to achieve the commensurate reduction in population, housing, and employment growth. Development projects and streetscape and transportation system improvements would occur as under the Proposed Project, with the exception of the public realm greening and pedestrian enhancements along Folsom Street and 12th Street and the posting of truck route signs. As with the Proposed Project and the No Project Alternative, development under the Reduced Growth Alternative would not divide or disrupt the existing Western SoMa community, nor would this alternative result in substantial adverse changes in the character of the Project Area; effects would be less than significant, as with the Proposed Project.

Aesthetics

Aesthetic effects of the Reduced Growth Alternative would be similar to those of the Proposed Project. The Project Area could experience development on all of the same sites where development could occur under the Proposed Project, albeit at reduced intensity and/or height in some cases. The built environment of the Project Area would continue to be made up of buildings of different types and styles, including residential and commercial, large and small, architecturally ornate and simple structures, and the visual character of the larger streets would continue to differ from that of the smaller alleyways. As with the Proposed Project, no substantial changes to the view corridors would occur. The Reduced Growth Alternative would include adoption of Design Standards similar to those proposed under the *Western SoMa Community Plan*. Therefore, aesthetic effects would be less than significant, as with the Proposed Project.

Population and Housing

Based on growth assumptions prepared as part of the transportation impact analysis, the Reduced Growth Alternative would result in approximately 5,670 housing units and 22,740 jobs. This would be approximately 577 less housing units and 1,270 less jobs, as compared to the Proposed Project (a 20-percent reduction). As with the Proposed Project, impacts on population and housing would be considered less than significant.

Cultural Resources

Under the Reduced Growth Alternative, the effects on historical resources would be similar to those of the Proposed Project, because development would be expected to occur at all of the same sites as under the Proposed Project, although in some instances at reduced intensity and/or height. Effects on historical resources would be marginally less substantial than those under the Proposed Project. As with the Proposed Project, however, individual projects implemented under this alternative in the future could result in demolition or substantial alteration of historical resources. Therefore, impacts on historical resources would be **significant and unavoidable**, as with the Proposed Project.

Effects on archeological resources would be less than significant with implementation of mitigation identified in Chapter 4, as would be the case for the Proposed Project; under the Reduced Growth Alternative, these effects could be marginally less substantial than those of the Proposed Project. As with the Proposed Project, effects on paleontological resources would also be less than significant.

Transportation and Circulation

Effects of the Reduced Growth Alternative related to the intensity of development would be reduced, compared to those of the Proposed Project, because less employment-generating development and fewer residential units would be added. Daily and peak-hour vehicle trip generation would be approximately 20 percent less than with implementation of the Proposed Project. This would result in incrementally less average vehicle delay at some local intersections, but the reduction in trip generation would result in no change in the level of service (LOS) at the study intersections, compared to conditions with the Proposed Project. Like the Proposed Project, the Reduced Growth Alternative would result in degraded LOS at the same three intersections: Fifth/Bryant/I-80 Eastbound on-ramp (p.m. peak hour), Eighth/Harrison/I-80 Westbound off-ramp (p.m. peak hour), and Sixth/Brannan/I-280 ramps (a.m. and p.m. peak hour). Thus, the Reduced Growth Alternative would not avoid the Proposed Project's **significant and unavoidable impacts** on LOS at these intersections, since these impacts are a result of the background (cumulative) growth in population and jobs.

Transit ridership under the Reduced Growth Alternative would also be reduced by up to 20 percent as compared to implementation of the Proposed Project. As with the No Project Alternative, this decrease in ridership would be sufficient to avoid the Proposed Project's significant cumulative impact, and transit impacts would be less than significant under the Reduced Growth Alternative.

Pedestrian and bicycle operations would not be substantially different under the Reduced Growth Alternative from those with implementation of the Proposed Project, and would be less than significant, as with the Proposed Project.

The Reduced Growth Alternative would implement the same public realm and transportation system improvements proposed as part of the *Western SoMa Community Plan*, with the exception of the public realm greening and pedestrian enhancements along Folsom Street and 12th Street and the posting of truck route signs. As a result, the Reduced Growth Alternative would avoid the Proposed Project's significant unavoidable impacts related to removal of on-street loading spaces along 12th Street and would also avoid the less than significant with mitigation impact related to removal of on-street loading spaces along Folsom Street.

Noise and Vibration

The Project Area could experience development on all of the same sites where development could occur under the Proposed Project, albeit at reduced intensity and/or height in some cases. Therefore, noise impacts from construction and from operation (traffic and building noise) would be somewhat reduced from those of the Proposed Project. As with the Proposed Project, these effects would be significant, but could be reduced to a less-than-significant level with mitigation identified in Chapter 4. Traffic noise levels would be incrementally less under cumulative conditions than what was identified for the

Proposed Project specifically because the Reduced Growth Alternative would not designate certain street segments as truck routes, as under the Proposed Project. This component constitutes a major contributor to the cumulative noise environment on street segments where such changes are proposed. Based on these, this alternative would reduce the Proposed Project's significant and unavoidable cumulative noise impact to a less-than-significant level.

Air Quality

Under the Reduced Growth Alternative, the reduction in vehicle trip generation, compared to that of the Proposed Project, would incrementally reduce emissions of criteria air pollutants from traffic. These impacts would be less than significant, as with the Proposed Project; as under the Proposed Project, the Draft Plan and Rezoning of Adjacent Parcels would be consistent with the Bay Area's 2010 *Clean Air Plan* under the Lesser Growth Alternative. However, construction-related air quality emissions of both criteria air pollutants and toxic air contaminants (TACs) from development proceeding under this alternative would result in a **significant, unavoidable impact**, as with the Proposed Project and the No Project Alternative because, depending on construction schedules of individual projects, diesel-powered construction equipment that operates with emissions levels low enough to avoid exceeding the Bay Area Air Quality Management District's recommended thresholds of significance may not be available, at least during the next several years. Exposure of sensitive receptors (existing and future residential areas, along with child care centers) to TACs from existing and future stationary sources (mostly backup generators, gasoline stations, and auto repair facilities) would also result in a **significant and unavoidable impact**, as with the Proposed Project. Lastly, similar to the Proposed Project, the Reduced Growth Alternative (although not the proposed transportation improvements or the 350 Eighth Street project) would result in **significant and unavoidable** cumulative air quality impacts from emissions of criteria air pollutants and exposure of sensitive receptors to substantial levels of TACs. These would be reduced as compared to the Proposed Project, although not to a less-than-significant level.

Greenhouse Gas Emissions

With less development and less vehicular traffic, the Reduced Growth Alternative would result in lower greenhouse gas emissions than would the Proposed Project. Effects would be less than significant, as with the Proposed Project.

Wind and Shadow

As under the Proposed Project, buildings under the Reduced Growth Alternative would generally be less than 80 feet tall and would therefore be unlikely to result in substantial adverse effects on ground-level winds such that pedestrians would experience discomfort. As is standard citywide procedure, specific projects proposed under the Reduced Growth Alternative would likewise be required to undertake design modifications to reduce any potential wind impacts, if necessary. Therefore, wind impacts would be less than significant with mitigation, as under the Proposed Project. Regarding potential shadow impacts on neighborhood parks and recreational facilities, similar to the Proposed Project, the Reduced Growth Alternative could result in **significant and unavoidable** shadow impacts on nearby parks and open spaces. However, because the Reduced Growth Alternative would incentivize generally shorter

buildings throughout the Project Area than would the Proposed Project, impacts related to new shadow would be accordingly reduced, as compared to the Proposed Project. However, it cannot be determined if those impacts would be reduced to a less-than-significant level; therefore, they are assumed to remain significant and unavoidable.

Biological Resources

Development under the Reduced Growth Alternative would occur in a developed urban area with limited existing natural resources, as with the Proposed Project. Effects on biological resources would likely be similar in nature to those resulting from implementation of the Proposed Project. While the Reduced Growth Alternative would not permit buildings as tall as those that would be allowed under the Draft Plan at specific locations (as discussed throughout this EIR, the Rezoning of Adjacent Parcels does not proposed height limit changes), as described in Section 4.L, Biological Resources, the lower stories of highly glazed buildings tend to result in the greatest risk of bird strikes because reflections of attractive ground-level features like vegetation can confuse birds and result in collisions. Therefore, effects related to bird strikes would be similar to those of the Proposed Project. This impact, however, would be rendered less than significant by compliance with Planning Code Section 139 and the City's *Standards for Bird-Safe Buildings*, and other effects on biological resources could be reduced to less-than-significant levels through implementation of mitigation measures identified in Chapter 4. Therefore, as with the Proposed Project, effects on biological resources would be less than significant with mitigation.

Recreation

The Reduced Growth Alternative would result in an increased population and employment, compared to existing conditions, but the increase in the number of residents in the Project Area would be about 20 percent less than with the Proposed Project, while employment would likewise increase by about 20 percent less. Thus, while growth under this alternative could increase the use of existing parks and recreational facilities, the increase would be less than that of the Proposed Project, and effect would be less than significant, as with the Proposed Project. As with the Proposed Project, a new park could be constructed under the Reduced Growth Alternative, depending to a certain degree on the City's current evaluation of open space needs as part of the Open Space 2100 project and the update of the *San Francisco General Plan* ROSE. Other non-traditional open space improvements described in the Draft Plan, such as upgrades to the pedestrian and bicycle network, would be implemented in essentially the same manner under the Reduced Project Alternative, with the exception of the public realm greening and pedestrian enhancements along Folsom Street and 12th Street and posting of truck route signs, as noted under "Description" above.

Public Services, Utilities, and Service Systems

Like the Proposed Project and the No Project Alternative, the Reduced Growth Alternative would incrementally increase the demand for public services and utilities within the Project Area over time. However, effects would be reduced in approximate proportion to the lesser residential and employment growth, compared to the Proposed Project. Effects would be less than significant, as with the Proposed Project.

Other Effects Related to Site-Specific Conditions

Like the No Project Alternative, the Reduced Growth Alternative would result in less future development than assumed for the Proposed Project. However, development and construction could occur at all of the same sites as under the Proposed Project, albeit at reduced intensity and/or height in some cases. Therefore, the Reduced Growth Alternative would be expected to have similar site-specific effects as the less-than-significant impacts of the Proposed Project with respect to geology and soils, including those resulting from groundshaking and liquefaction; water quality, erosion, flooding, and stormwater runoff; and exposure to hazards and hazardous materials during construction and demolition activities (which would be less than significant with mitigation). As under the Proposed Project, there would be less than significant or no impacts on mineral and energy resources or agricultural and forest resources under the Reduced Growth Alternative.

350 Eighth Street Impacts

Under the Reduced Growth Alternative, the 350 Eighth Street project would have about 90 fewer dwelling units, but non-residential floor area would be the same as under the Proposed Project. With the reduced number of units and change in unit mix, effects related to the intensity of development, including trip generation and traffic-generated air pollutant emissions, greenhouse gas emissions, and traffic noise, would be reduced by about 20 percent. As with the Proposed Project, the traffic impact at the Eighth/Harrison Streets intersection would be less than significant with mitigation. Also as with the Proposed Project, construction air quality effects related to exposure to emissions from diesel equipment would be **significant and unavoidable**, as with the Proposed Project. Also like the Proposed Project, other impacts of the 350 Eighth Street project related traffic, air quality, and noise would be less than significant under the Reduced Growth Alternative, with mitigation where applicable as identified in Chapter 4.

Aesthetic effects would be marginally less substantial than those of the Proposed Project, given the one-story reduction in height of the 350 Eighth Street project under this alternative; effects would be less than significant, as with the Proposed Project. Ground-floor uses would be the same as under the Proposed Project, meaning effects at pedestrian level would be largely the same as with the Proposed Project.

Other impacts related to the intensity of development, including those on recreation and public space, utilities and service systems, public services, and shadow and wind, would be incrementally less substantial than those of the Proposed Project, given the reduced size of the buildings. These effects would be less than significant, as with the Proposed Project. Impacts related to site-specific conditions, such as those related to historical and subsurface cultural (archeological) resources, geology, hydrology and water quality, and hazardous materials would be similar to those of the Proposed Project because the same development site would be affected. These impacts would be less than significant, with the same mitigation measures, where applicable, as described for the Proposed Project. Effects on biological resources would be similar to those of the Proposed Project and would be less than significant with mitigation and with compliance with Planning Code Section 139 and the City's *Standards for Bird-Safe Buildings*.

Alternative 3: Greater Growth Alternative

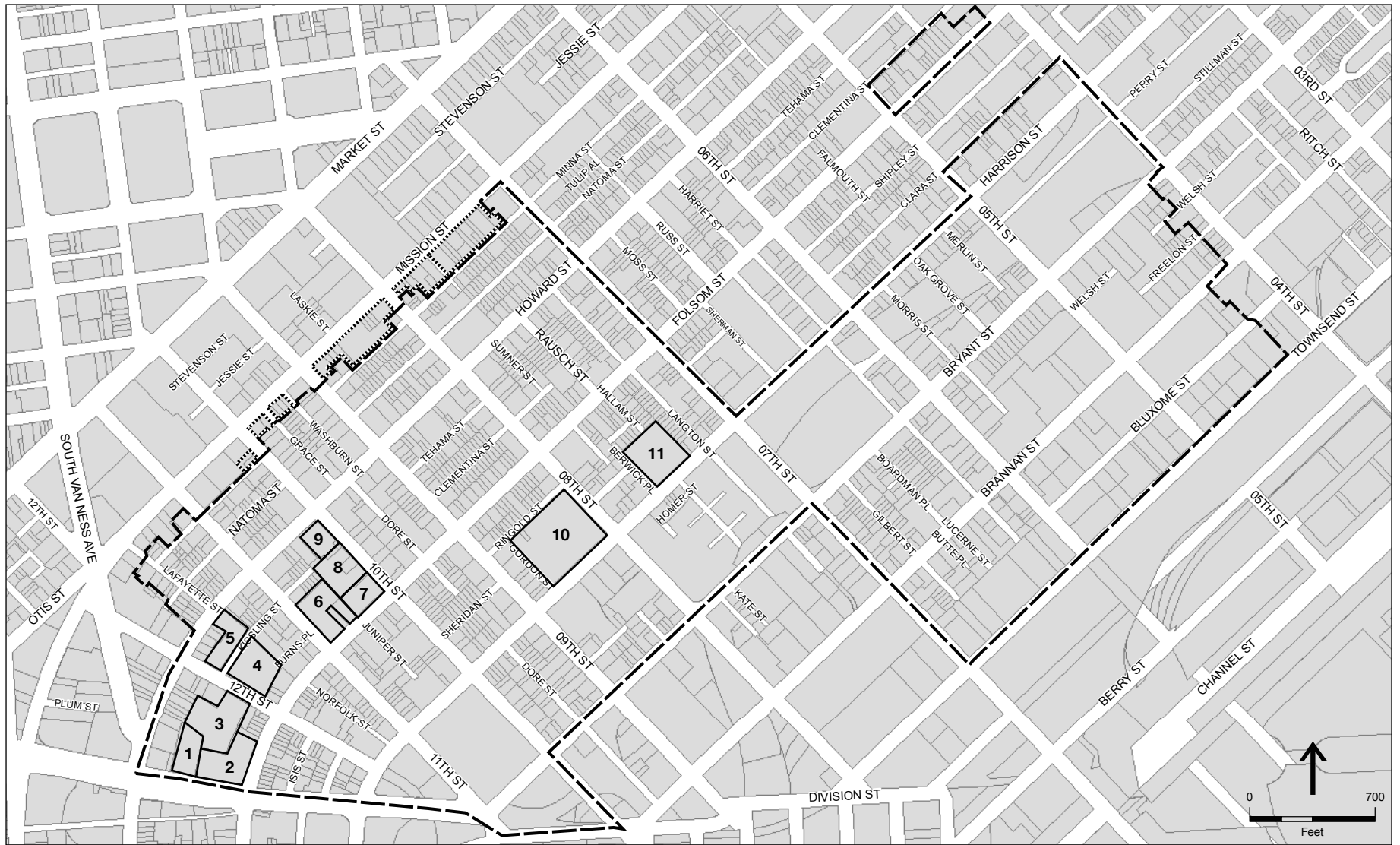
Description

The Greater Growth Alternative is based on a more intensive development program for certain sites (“opportunity sites”) within the *Western SoMa Community Plan Area*, as compared to the program envisioned in the Draft Plan. This alternative would also reduce one or more of the significant impacts identified for the Proposed Project, as discussed below. This alternative would develop 11 opportunity sites within the Draft Plan Area at a higher density than proposed by the Draft Plan, while implementing the Draft Plan as proposed under the Proposed Project everywhere else in the Draft Plan Area. These 11 opportunity sites, identified in **Figure 6-1** on the following page, are all located north of Harrison Street; one is located at 350 Eighth Street. Nine of the 11 opportunity sites are located in the area bounded by 10th, 13th, Howard, and Folsom Streets. The remaining site is located on a large parcel on the block bounded by Harrison, Folsom, Seventh, and Eighth Streets. Existing uses on these sites include automobile repair services, a sporting goods retailer, public storage, institutional uses, and public parking. Several of these parcels (including the 350 Eighth Street project site) are primarily used only on the ground level for automobile and bus storage yards. The 11 opportunity sites total approximately 14 acres and currently include buildings ranging from one to six stories tall.

Under the Greater Growth Alternative, all of the parcels identified for more intensive development would be rezoned as either Western SoMa Mixed-Use General (W SoMa MUG) or Western SoMa Regional Commercial District (W SoMa RCD), the same as proposed under the *Western SoMa Community Plan*. All 11 parcels are identified in the Draft Plan as parcels where building heights up to 65 feet could be considered through a CU authorization and hearing process. Under this alternative, however, the maximum height limits on these parcels would be increased to 85 feet, 20 feet higher than under the Draft Plan, in order to encourage more intensive development programs on these parcels, which are generally considered underused. The increased allowable heights on the 11 opportunity sites under the Greater Growth Alternative would result in larger buildings with more housing units than would be allowed under the Draft Plan. Non-residential uses (and, thus, employment) would remain similar to what is proposed under the Draft Plan, since this alternative specifically targets residential development.

It is assumed that, with the exception of more intensive development on these 11 opportunity sites, the Draft Plan would be implemented as proposed under the Proposed Project. Thus, the same rezoning and height and bulk changes would occur throughout the rest of the Draft Plan Area as described in Chapter 2, Project Description. Thus, the Greater Growth Alternative assumes the same growth projections for the remainder of the Draft Plan Area as assumed under the Draft Plan.

As shown in **Table 6-2**, below, a total of approximately 1,273 housing units could be developed under the Greater Growth Alternative on the 11 opportunity sites identified for more intensified growth. This would be approximately 341 more housing units than would be expected under the Draft Plan. It is noted that some of the opportunity sites identified, such as the St. Joseph’s Church (number 9 on **Table 6-2**, below), contain historic properties. Thus, development potential on those sites could be somewhat constrained, both under the Draft Plan and the Greater Growth Alternative.



- | | | | |
|--|---|--|---|
| <ul style="list-style-type: none"> --- Western SoMa Community Plan Area Adjacent Parcels | <ul style="list-style-type: none"> 1 170 13th Street 2 1690 Folsom Street 3 252 12th Street 4 255 12th Street | <ul style="list-style-type: none"> 5 160 Kissling Street 6 1480 Folsom Street 7 1400 Folsom Street 8 260 10th Street | <ul style="list-style-type: none"> 9 1401 Howard Street 10 350 Eighth Street 11 1144 Harrison Street |
|--|---|--|---|

SOURCE: ESA

2008.0877E and 2007.1035E: Western SoMa Community Plan, Rezoning of Adjacent Parcels, and 350 Eighth Street Project
Figure 6-1
 Greater Growth Alternative - Opportunity Sites

TABLE 6-2 (Revised)
GREATER GROWTH ALTERNATIVE OPPORTUNITY SITES

Map Number	Address	Existing Uses	Acres	Proposed Height/Bulk Limit under Draft Plan	Number of Housing Units w/ Proposed Height under Draft Plan	Height/Bulk Limit under Greater Growth Alternative	Number of Housing Units w/ Proposed Height under Greater Growth Alternative
1	170 13th Street	Automotive	0.8	55-X/65-B	44	55-X/85-K	60
2	1690 Folsom Street	Retail	1.4	55-X/65-B	75	55-X/85-K	105
3	252 12th Street	Automotive	1.6	55-X/65-B	89	55-X/85-K	124
4	255 12th Street	Public Parking	1.3	55-X/65-B	55	55-X/85-K	110
5	160 Kissling Street	Automotive	0.8	55-X/65-B	35	55-X/85-K	49
6	1480 Folsom Street	Automotive	1.0	55-X/65-B	42	55-X/85-K	59
7	1400 Folsom Street	Public Storage	0.8	55-X/65-B	37	55-X/85-K	52
8	260 10th Street	Institutional	1.0	55-X/65-B	43	55-X/85-K	60
9	1401 Howard Street	Institutional	0.6	55-X/65-B	27	55-X/85-K	37
10	350 Eighth Street	Bus Yard	3.3	55-X/65-B	444	55-X/85-K	560
11	1144 Harrison Street	Industrial	1.7	55-X/65-B	41	55-X/85-K	57
Total Housing Units					932	—	1,273
Net Addition Housing Units on Opportunity Sites							341

SOURCES: San Francisco Planning Department, 2012.

Similar to the Reduced Growth Alternative, the Greater Growth Alternative would include most of the areawide streetscape and transportation system improvements envisioned by the Draft Plan. Specifically, the following would be implemented:

- Installation of new signalized mid-block crossings on Folsom Street at Rausch Street (between Seventh and Eighth Streets) and mid-block between Eighth and Ninth Streets;
- Installation of new signalized mid-block crossings at Seventh and Minna Streets and Eighth and Natoma Streets;
- Installation of streetscape and traffic calming improvements on Minna, Natoma, and Ringold Streets; and
- Installation of gateway treatments at and in vicinity of freeway off-ramps, potentially including signage, lighting, and physical roadway features such as enhanced hardscape area, landscaped islands, or colored textured pavement.

However, the Greater Growth Alternative would not post “truck route” signs on Ninth, 10th, Harrison, and Bryant Streets in the Draft Plan Area nor include the public realm greening and pedestrian enhancements along Folsom Street and 12th Street that are proposed under the Draft Plan, in order to avoid the Proposed Project’s significant unavoidable impacts related to removal of on-street loading spaces along 12th Street and also avoid the less than significant with mitigation impacts related to removal of on-street loading spaces along Folsom Street.

Under this alternative, the Rezoning of Adjacent Parcels would be implemented as under the Proposed Project. However, as under the Proposed Project, no height rezoning is anticipated as part of this project component; therefore, a more intensified development would not necessarily be achieved on this portion of the Project Area. However, the rezoning these parcels would meet the basic objectives of the project and is therefore included as part of the Greater Growth Alternative.

350 Eighth Street Project

The 350 Eighth Street project site is one of the locations where increased height would be permitted under this alternative. Therefore, under the Greater Growth Alternative, that development project would accommodate 560 dwelling units, about 25 percent more than the 444 units proposed by the 350 Eighth Street project. Under the Greater Growth Alternative, the 350 Eighth Street project would include eight-story-plus-mezzanine structures on the Eighth Street and Harrison Street frontages and in the center of the site; these structures would be two stories taller than those included in the Proposed Project. The buildings on Gordon and Ringold Streets would be developed at the same height and intensity as under the Proposed Project.

Objectives

The Greater Growth Alternative would meet most of the project sponsors’ objectives for the implementation of the Draft Plan and of the objectives associated with the Rezoning of Adjacent Parcels. The additional dwelling units and associated population growth anticipated under this alternative would

not conflict with the promotion of safety in the public realm or the diversity of neighborhood land uses. With a larger population serving as “eyes on the street,” public safety concerns could in fact be reduced further under this alternative in comparison to the Draft Plan. However, this alternative would conflict with the objective to maintain the existing scale and density of the Draft Plan Area. If the maximum allowable 85-foot-tall buildings were constructed on these parcels, these new buildings could be somewhat out of scale with adjacent properties, even considering the height increases proposed under the Draft Plan for these parcels. New buildings on these 11 parcels would be 30 feet taller than most of the surrounding buildings, and up to 45 feet taller than an adjacent RED proposed on both sides of Kissling Street at 11th Street and another RED on Langton Street near Harrison Street.

Plan-Level Impacts

Land Use

Under the Greater Growth Alternative, most of the zoning and height and bulk district changes would be made as under the Proposed Project, with the exception of the 11 sites noted under “Description,” above. At those locations, additional height would be permitted, but the new use districts would be the same as with the Proposed Project. Therefore, development projects and streetscape and transportation system improvements would occur largely as assumed under the Proposed Project, except at greater heights on the 11 selected opportunity sites and with the exception of the public realm greening and pedestrian enhancements along Folsom Street and 12th Street that are proposed under the Draft Plan. As seen in **Figure 6-2** on page 6-22, the 11 parcels are generally near the northwest corner of the Draft Plan Area, meaning that the increased development intensity under this alternative would be focused in an area between Howard and Folsom Streets west of 10th Street and would not be proximate to most of the residential alleys, with the exception of Kissling Street on either side of 11th Street. As with the Proposed Project, the No Project Alternative, and the Reduced Growth Alternative, development under the Greater Growth Alternative would not divide or disrupt the existing Western SoMa community, nor would this alternative result in substantial adverse changes in the character of the Project Area; effects would be less than significant, as under the Proposed Project.

Aesthetics

Aesthetic effects of the Greater Growth Alternative would be similar to those of the Proposed Project: the Project Area would experience development on the same sites where development could occur under the Proposed Project, albeit at increased height on the 11 opportunity site. As described in Section 4.B, Aesthetics, the built environment of the *Western SoMa Community Plan Area* would continue to be made up of buildings of different types and styles, including residential and commercial, large and small, architecturally ornate and simple structures, and the visual character of the larger streets differs from that of the smaller alleyways. As with the Proposed Project, no changes to the view corridors would occur. As noted in the discussion of land use impacts, above, most of the greater height limits would be in the northwest corner of the Draft Plan Area. The Greater Growth Alternative would include adoption of Design Standards, as under the Proposed Project. For these reasons, and because the changes in height limits compared to the Proposed Project would be made only at selected parcels, aesthetic effects would be less than significant, as under the Proposed Project.

Population and Housing

Under the Greater Growth Alternative, by 2030, the number of residents within the Project Area would be about 14,100, representing an increase of about 750 as compared to the Proposed Project. Because the increased height limits under this alternative would only affect residential development, employment would be expected to be essentially the same as under the Proposed Project. Effects related to population and housing would be less than significant, as under the Proposed Project.

Cultural Resources

Effects on historical resources would be similar in nature to those of the Proposed Project, if marginally increased in severity, because development would be expected to occur at the same sites as under the Proposed Project, although at greater heights at the 11 sites identified in under “Description,” above. It is not expected that the potential increase of 20 feet in height would result in substantially greater impacts on historical resources compared to those that would occur with the Proposed Project. As with the Proposed Project, however, individual projects implemented in the future could result in demolition or substantial alteration of historical resources under this alternative. Therefore, impacts on historical resources would be **significant and unavoidable**, as under the Proposed Project.

Effects on archeological resources would be less than significant with implementation of mitigation identified in Chapter 4, as would be the case under the Proposed Project. As with the Proposed Project, effects on paleontological resources would be less than significant.

Transportation and Circulation

Effects of the Greater Growth Alternative related to the intensity of development would be marginally increased, compared to those of the Proposed Project, because more housing units would be added. Daily and peak-hour vehicle trip generation would be slightly greater as compared to the Proposed Project, but would not be enough to result in a perceptible change in average vehicle delay at local intersections. (The increase would be less than 1 second in all cases.) The increase in trip generation would result in no change in the LOS at the study intersections, compared to conditions with the Proposed Project. Like the Proposed Project and the No Project Alternative, the Greater Growth Alternative would result in degraded LOS at the same three intersections: Fifth/Bryant/I-80 Eastbound on-ramp (p.m. peak hour), Eighth/Harrison/I-80 Westbound off-ramp (p.m. peak hour), and Sixth/Brannan/I-280 ramps (a.m. and p.m. peak hour). Thus, the Greater Growth Alternative would not avoid the Proposed Project’s **significant and unavoidable impacts** on LOS at these intersections.

Transit ridership would also be marginally greater than with implementation of the Proposed Project. Unlike the No Project Alternative and Reduced Growth Alternative, transit ridership from the Greater Growth Alternative would contribute to a **significant and unavoidable cumulative impact** on transit demand, as would be the case with the Proposed Project.

Pedestrian and bicycle operations would not be substantially different under the Greater Growth Alternative from those with implementation of the Proposed Project, and impacts would be less than significant.

The Greater Growth Alternative would not include the public realm greening and pedestrian enhancements along Folsom Street and 12th Street that are proposed under the Draft Plan or the posting of truck route signs. Accordingly, the Greater Growth Alternative would avoid the Proposed Project's significant unavoidable impacts related to removal of on-street loading spaces along 12th Street and would also avoid the less than significant with mitigation impacts related to removal of on-street loading spaces along Folsom Street.

Noise and Vibration

Increased residential development would be anticipated under the Greater Growth Alternative, compared to the Proposed Project. Therefore, noise impacts from construction and from operation (traffic and building noise) could be incrementally greater than those of the Proposed Project. However, construction would occur at the same sites as under the Proposed Project, differing perhaps marginally in duration. Traffic noise levels would be incrementally less under cumulative conditions than what was identified for the Proposed Project specifically because the Greater Growth Alternative would not designate certain street segments as truck routes, as under the Proposed Project. This component constitutes a major contributor to the cumulative noise environment on street segments where such changes are proposed. Based on these, this alternative would reduce the Proposed Project's significant and unavoidable cumulative noise impact to a less-than-significant level.

Air Quality

Under the Greater Growth Alternative, the slight increase in vehicle trip generation, compared to that of the Proposed Project, would incrementally increase emissions of criteria air pollutants from traffic, but not to a level that would result in a significant impact; as under the Proposed Project, the Draft Plan and Rezoning of Adjacent Parcels would be consistent with the Bay Area's 2010 Clean Air Plan under the Greater Growth Alternative. Thus, these impacts would be less than significant, as with the Proposed Project. However, construction-related air quality emissions of both criteria air pollutants and toxic air contaminants (TACs) from development proceeding under this alternative would result in a **significant, unavoidable impact**, as under the Proposed Project, because, depending on construction schedules of individual projects, diesel-powered construction equipment that operates with emissions levels low enough to avoid exceeding the Bay Area Air Quality Management District's recommended thresholds of significance may not be available, at least during the next several years. Exposure of sensitive receptors (existing and future residential areas, along with child care centers) to TACs from existing and future stationary sources (mostly backup generators, gasoline stations, and auto repair facilities) would also result in a **significant and unavoidable impact**, as with the Proposed Project. Lastly, similar to the Proposed Project, the Greater Growth Alternative (although not the proposed transportation improvements or the 350 Eighth Street project) would result in **significant and unavoidable** cumulative air quality impacts from emissions of criteria air pollutants and exposure of sensitive receptors to substantial levels of TACs. Moreover, due to the increased development potential associated with this alternative, these impacts would be incrementally amplified as compared to the Proposed Project.

Greenhouse Gas Emissions

With more development and vehicular traffic, the Greater Growth Alternative would result in slightly increased greenhouse gas emissions than would the Proposed Project. This increase would not be substantial at the plan level, and effects would be less than significant, as under the Proposed Project.

Wind and Shadow

As under the Proposed Project, the maximum height of buildings at the 11 opportunity sites would be 85 feet. Therefore, wind impacts could be incrementally more substantial as compared to the Proposed Project. Therefore, mitigation measure identified in Chapter 4 would be applicable and would reduce those impacts to a less-than-significant level, same as under the Proposed Project. Regarding potential shadow impacts on neighborhood parks and recreational facilities, the Greater Growth Alternative, similar to the Draft Plan and Rezoning of Adjacent Parcels, could result in **significant and unavoidable** shadow impacts on nearby parks and open spaces. Moreover, because the Greater Growth Alternative would incentivize taller buildings on the 11 opportunity sites than would the Proposed Project, impacts related to shadow would be increased slightly as compared to the Proposed Project.

Biological Resources

Development under the Greater Growth Alternative would occur in a developed urban area with limited existing natural resources, as under the Proposed Project. Effects on biological resources would likely be similar in nature to those resulting from implementation of the Proposed Project. While the Greater Growth Alternative would permit taller buildings than those that would be allowed under the Proposed Project at specific locations, as described in Section 4.L, Biological Resources, the lower stories of highly glazed buildings tend to result in the greatest risk of bird strikes because reflections of attractive ground-level features like vegetation can confuse birds and result in collisions. Therefore, effects related to bird strikes would be similar to those under the Proposed Project. This impact, however, would be rendered less than significant by compliance with Planning Code Section 139 and the City's *Standards for Bird-Safe Buildings*, and other effects on biological resources could be reduced to less-than-significant levels through implementation of mitigation measures identified in the EIR. Therefore, as with the Proposed Project, effects on biological resources would be less than significant with mitigation.

Recreation

The Greater Growth Alternative would result in increased population and employment, compared to existing conditions, but the increase in the number of residents in the Project Area would not be substantial enough to markedly increase demand for recreational facilities. Thus, while growth under this alternative would increase the use of existing parks and recreational facilities, the effect would be less than significant, as with implementation of the Proposed Project. As with the Proposed Project, a new park could be constructed under the Greater Growth Alternative, depending to a certain degree on the City's current evaluation of open space needs as part of the Open Space 2100 project and the update of the *San Francisco General Plan* ROSE. Some of the other non-traditional open space improvements described in the Draft Plan, such as upgrades to the pedestrian and bicycle network, would be implemented similarly under the Greater Growth Alternative as under the Proposed Project. The

exception to this would be public realm greening and pedestrian enhancements along Folsom Street and 12th Street or the posting of truck route signs, as discussed above. However, in general, impacts related to recreation would be less than significant, as under the Proposed Project.

Public Services, Utilities, and Service Systems

Like the Proposed Project, the Greater Growth Alternative would incrementally increase the demand for public services and utilities within the Project Area over time. Effects would not be substantially greater than those of the Proposed Project and would be less than significant.

Other Effects Related to Site-Specific Conditions

Compared to the Proposed Project, the Greater Growth Alternative would result in larger future development on the 11 opportunity sites noted under “Description,” above. Development and construction are assumed to occur at the same sites as under the Proposed Project, albeit at increased height in the case of the 11 parcels. The additional 20 feet in height that could be accommodated at those sites under this alternative would not substantially alter site-specific impacts. Therefore, the Greater Growth Alternative would be expected to have similar site-specific effects as the less-than-significant impacts of the Proposed Project with respect to geology and soils, including those resulting from groundshaking and liquefaction; water quality, erosion, flooding, and stormwater runoff; and exposure to hazards and hazardous materials during construction and demolition activities (which would be less than significant with mitigation). As under the Proposed Project, there would be less than significant or no impacts on mineral and energy resources or agricultural and forest resources under the Greater Growth Alternative.

350 Eighth Street Impacts

Under the Greater Growth Alternative, as noted above, the 350 Eighth Street project would have about 115 more dwelling units than under the Proposed Project; non-residential floor area would be the same as under the Proposed Project. With the increased number of units, effects related to the intensity of development, including trip generation and traffic-generated air pollutant emissions, greenhouse gas emissions, and traffic noise, would be increased by about 25 percent. With more traffic, the Transportation impact associated with levels of service at the intersection of Eighth/Harrison/I-80 Westbound off-ramp would likely remain **significant and unavoidable** even with implementation of the mitigation measure to adjust signal timing. As with the Proposed Project, construction air quality effects related to exposure to emissions from diesel equipment would be **significant and unavoidable**, as with the Proposed Project. Also like the Proposed Project, other impacts of the 350 Eighth Street project related traffic, air quality, and noise impacts would be less than significant under the Greater Growth Alternative, with mitigation where applicable, as identified in Chapter 4.

Aesthetic effects would be greater than those of the Proposed Project because the 350 Eighth Street project under this alternative would present a street wall on Eighth and Harrison Streets composed of buildings eight stories (plus mezzanine) and 85 feet in height. However, with modulation of the facades, effects would be less than significant, as with the Proposed Project. Ground-floor uses would be the same as

under the Proposed Project, meaning effects at pedestrian level would be largely the same as with the Proposed Project.

Because this alternative would develop taller buildings, up to 85 feet in height, the 350 Eighth Street project, under the Greater Growth Alternative, would have the potential to result in wind impacts. However, with implementation of applicable mitigation measure identified in Chapter 4, this impact would be reduced to a less-than-significant level, similar to the Proposed Project. The taller buildings on the 350 Eighth Street project site would not cast shadow on Recreation and Park Commission properties or otherwise adversely affect enjoyment of nearby public parks and/or open spaces. For this reason, and shadow effects would be less than significant, as with the Proposed Project.

Other impacts related to the intensity of development, including those on recreation and public space, utilities and service systems, and public services, would be incrementally greater than those of the Proposed Project, given the increased size of the 350 Eighth Street project and the approximately 25-percent increase in residential population, compared to the Proposed Project. However, the increase of about 250 residents would not substantially increase demand for these utilities and services in the context of citywide and areawide demand, and these effects would be less than significant, as with the Proposed Project. Impacts related to site-specific conditions, such as those related to historical and subsurface cultural (archeological) resources, geology, hydrology and water quality, and hazardous materials, would be similar to those of the Proposed Project because the same development site would be affected. These impacts would be less than significant, with the same mitigation measures, where applicable, as described for the Proposed Project. Effects on biological resources would be similar to those of the Proposed Project and would be less than significant with mitigation and with compliance with Planning Code Section 139 and the City's *Standards for Bird-Safe Buildings*.

C. Environmentally Superior Alternative

The CEQA *Guidelines* require the identification of an environmentally superior alternative (Section 15126.6[e]). If it is determined that the “no project” alternative would be the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other project alternatives (Section 15126.6[3]).

The No Project Alternative would be the environmentally superior alternative because it would reduce or eliminate some of the environmental impacts associated with the Proposed Project, including impacts associated with removal of on-street loading along 12th and Folsom Street, cumulative noise impacts related to increased truck traffic along “truck routes,” project-specific and cumulative shadow impacts, and impacts associated with the general intensification of the Project Area, including transportation and air quality impacts. Of the remaining alternatives, the Reduced Growth Alternative would also qualify as the environmentally superior alternative because it would reduce some of the impacts associated with the Proposed Project, such as potential impacts to historical resources, air quality emissions, noise impacts, shadow impacts, and transportation-related impacts. However, whether those impacts would be reduced to a less-than-significant level cannot be determined. The Reduced Growth Alternative would also reduce the less-than-significant impacts associated with Proposed Project implementation, including those related to individual historical resources and contributors to historic districts, archeological resources, temporary or

permanent ambient noise levels and construction-related noise and vibration, alterations to wind patterns, impacts on species identified as candidate, sensitive, or special-status species, and impacts associated with hazardous materials.

D. Alternatives Considered and Rejected

An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines, Section 15126.6[f][3]). Alternatives may be eliminated from detailed consideration in the EIR if they fail to meet most of the project objectives, are infeasible, or do not avoid any significant environmental effects (CEQA Guidelines, Section 15126.6[c]). Several alternatives were considered in an attempt to alleviate impacts associated with the Proposed Project. Those that failed to meet the project objectives or were deemed infeasible were the Draft Plan Preservation Alternative and the 350 Eighth Street Off-Site Alternative. As such, both were eliminated from further consideration, as discussed below.

Draft Plan Preservation Alternative

The Planning Department explored an alternative that could reduce the significant adverse impact of the Draft Plan on historical resources. With the Draft Plan Preservation Alternative, Planning Code Section 803.9, Commercial Uses in Mixed Use Districts, which, under the Draft Plan would be applied to designated City Landmarks and contributors to City Landmark Districts (in both cases listed in Planning Code Article 10), would instead be applied to all historical resources determined eligible for the California Register. This would be consistent to how this Planning Code section is applied elsewhere in Eastern Neighborhoods Mixed-Use Districts. The application of Section 803.9 is intended to advance historic preservation by allowing historical resources to be converted to other uses, provided that any changes to these buildings are consistent with the Secretary of the Interior's Standards for Rehabilitation. Specifically, in the Eastern Neighborhoods MUG, MUO, and MUR use districts, Section 803.9(b) permits all land uses except nighttime entertainment as of right in qualifying buildings, providing the Zoning Administrator determines that the use(s) in question will aid preservation of the building; the Historic Preservation Commission finds that the project is consistent with the Secretary's Standards and applicable Planning Code preservation provisions; and, for residential uses, the Planning Code's affordable housing provisions

are met. This alternative was deemed infeasible because it would be preclude implementation of the Draft Plan's land use controls, particularly in the proposed Western SoMa MUG use district, that are intended to limit the intrusion of office use into the portion of the Draft Plan Area that contains the greatest concentration of residential uses; that is, the area north of Harrison Street.

Of the 19 full or partial blocks in the Draft Plan Area north of Harrison Street, most are proposed for designation of Western SoMa MUG for the majority of their non-residential land. This northern portion of the Draft Plan Area is substantially coincident with the California Register-eligible Western SoMa Light Industrial and Residential Historic District, two-thirds of the buildings of which are contributory to the district, meaning that nearly any land use would be permitted in many of these buildings under Section 803.9(b) as it is applied in the Eastern Neighborhoods MUG District. Because of the large

**TABLE 6-3
COMPARISON OF THE ENVIRONMENTAL IMPACTS OF THE PROJECT TO THE
IMPACTS OF THE ALTERNATIVES**

	Proposed Project	No Project Alternative	Reduced Growth Alternative	Greater Growth Alternative
Description	Western SoMa Community Plan, as proposed; Rezoning of Adjacent Parcels, as proposed; 350 Eighth Street project, as proposed.	Maintenance of existing zoning and height and bulk controls in the Project Area, including the Draft Plan Area, Adjacent Parcels, and 350 Eighth Street project site.	Rezoning to achieve 20 percent less growth Project Area-wide than would be created under the Proposed Project. 350 Eighth Street project would be 10 feet shorter, and would accommodate 90 fewer dwelling units. Posting of "truck route" signs on Ninth, 10th, Harrison, and Bryant Street and public realm greening and pedestrian enhancements along Folsom Street and 12th Street would be excluded from the Transportation and Street Network Improvements program. Rezoning of Adjacent Parcels as proposed under Proposed Project.	Western SoMa Community Plan as proposed, with exception of 11 opportunity sites (including 350 Eighth Street project site) that would be developed more intensively as compared to the Draft Plan. Posting of "truck route" signs on Ninth, 10th, Harrison, and Bryant Street and public realm greening and pedestrian enhancements along Folsom Street and 12th Street would be excluded from the Transportation and Street Network Improvements program. Rezoning of Adjacent Parcels as proposed under Proposed Project.
Ability to Meet Project Sponsor's Objectives	Would meet all objectives for the Draft Plan, Rezoning of Adjacent Parcels, and the 350 Eighth Street project.	Would not meet most objectives for the Draft Plan, Rezoning of Adjacent Parcels, or the 350 Eighth Street project.	Would meet most objectives for the Draft Plan and 350 Eighth Street project. Would meet all objectives for the Rezoning of Adjacent Parcels.	Would meet most objectives for the Draft Plan and the 350 Eighth Street project. Would meet all of the objectives for the Rezoning of Adjacent Parcels
Land Use	LS	LS↑	LS↔	LS↔
Aesthetics	LS	LS↑	LS↔	LS↑
Population and Housing	LS	LS↔	LS↔	LS↔
Cultural and Paleontological Resources	SU	SU↔	SU↓	SU↑
Transportation and Circulation	SU	SU↑	SU↓	SU↑
Noise and Vibration	SU	SM↓	SM ↓	SM ↓
Air Quality	SU	SU↑	SU↓	SU↑
Greenhouse Gas Emissions	LS	LS↑	LS↓	LS↑
Wind and Shadow	SU	SU↔	SU↓	SU↑
Recreation	LS	LS↑	LS↓	LS↑

TABLE 6-3 (Continued)
COMPARISON OF THE ENVIRONMENTAL IMPACTS OF THE PROJECT TO THE
IMPACTS OF THE ALTERNATIVES

	Proposed Project	No Project Alternative	Reduced Growth Alternative	Greater Growth Alternative
Public Services, Utilities, and Service Systems	LS	LS↔	LS↔	LS↔
Biological Resources	SM	SM ↔	SM ↔	SM ↔
Geology and Soils	LS	LS↔	LS↔	LS↔
Hydrology and Water Quality	LS	LS↔	LS↔	LS↔
Hazards and Hazardous Materials	SM	SM ↔	SM ↔	SM ↔
Mineral and Energy Resources	LS	LS↔	LS↔	LS↔
Agricultural Resources	N	N	N	N

Legend

LS Less than significant or negligible impact; no mitigation required

SM Significant but Mitigable

SU Significant and unavoidable adverse impact, after mitigation

N No impact

↑↓↔ Impact is more severe than, less severe than, or similar to project impact, after mitigation

Note: The identified level of significance represents the worst case significance conclusion of all impacts addressed under the corresponding environmental topic.

concentration of historical resources in the northern part of the Draft Plan Area, this alternative was deemed infeasible as not meeting many of the basic objectives of the Draft Plan. Specifically, this alternative could conflict with the following objectives: Mitigate to the fullest extent possible neighborhood impacts resulting from new development; Stabilize the neighborhood against speculative land use proposals and developments; Maintain and encourage the existing community cultural diversity; Proposed new land use development shall primarily serve the needs of existing residents and businesses. Citywide and regional needs are subordinate to existing local needs; Maintain and promote diversity (e.g., day/night, living/working, spectrum of uses, etc.) of neighborhood land uses; and Encourage nurturing characteristics and maximize opportunities for seniors, families, youth and children.⁴

⁴ For context, it is noted that the Western Western SoMa Light Industrial and Residential Historic District is comparable in size to the Kearny-Market-Mason-Sutter Conservation District that is identified in Planning Code Article 11, Preservation of Buildings and Districts of Architectural, Historical, and Aesthetic Importance in the C-3 District. The Kearny-Market-Mason-Sutter Conservation district is by far the largest of the landmark districts and conservation districts listed in Article 10 and 11, respectively, of the Planning Code, and it contains a comparable percentage of contributory buildings (about 70 percent, versus 66 percent for the Western Western SoMa Light Industrial and Residential Historic District). However, there are no comparably permissive land use controls to Section 803.9 that apply to historical resources outside the Eastern Neighborhoods Mixed-Use Districts.

350 Eighth Street Off-Site Alternative

The Planning Department explored the possibility of developing the 350 Eighth Street project elsewhere in San Francisco and not on the 350 Eighth Street project site. However, no suitable sites are readily available that could meet the needs of the 350 Eighth Street project, including those related to size and intensity as well as its connection to the transit network and proximity to the city's downtown. In particular, there are no other readily developable sites (i.e., the 350 Eighth Street project site is currently a 3.3-acre paved parking lot occupied by only three single-story buildings) in the Draft Plan Area that are as large as the project site. Moreover, the project sponsor lacks access to other sites. While such an alternative might meet project sponsor's objectives related to developing a project that is capable of providing return on investment (although this, too, is speculative), it would not meet any of the project's objectives related to revitalizing the 350 Eighth Street project site or relating it to the neighborhood context in which the site is located.