

Executive Summary

HEARING DATE: APRIL 3, 2014

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Recreation and Open Space Element Update

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March 27, 2014

2010.0641 M

Reviewed by: Joshua Switzky (Joshua.Switzky@sfgov.org)

Recommendation: Adoption of Proposed General Plan Amendments related to the update

to the Recreation and Open Space Element

PROJECT DESCRIPTION

Date:

Case No.:

Staff Contact:

Project:

The Recreation and Open Space Element of the General Plan is one of the ten elements of the San Francisco General Plan, guiding the City to "to ensure that the qualities that make San Francisco unique are preserved and enhanced." Each element of the General Plan signifies the City's overarching strategies and goals in the underlying matters. The Recreation and Open Space Element (ROSE) of the General Plan was last updated in 1986 and California State law requires all jurisdictions to maintain an up-to-date a relevant recreation and open space element.

In November 2007, the Mayor's Office launched the Mayor's Open Space Task Force, composed of over 80 landscape architects, open space advocates and residents from around the City. Their goal was to develop supportive open space policies, coordinate resources towards achieving open space goals, and create strategies to acquire, develop, renovate and maintain open space opportunities in every neighborhood. The work of this task force highlighted the need to update the Recreation and Open Space Element (ROSE) of the General Plan in order to address current opportunities and challenges to meeting the recreation and open space needs of the City today.

Public Outreach

After meeting for almost a year, the Task Force developed a series of overarching themes which provided direction for an update of the ROSE, and staff from the Planning Department, Recreation and Parks Department, and the Neighborhoods Parks Council (the City's nonprofit partner at the time) embarked upon a series of meetings with neighborhoods, organizations, and City departments to develop open space goals, policies and objectives.

After 17 meetings Planning staff developed the first *Draft Recreation and Open Space Element*. This Draft was released in May 2009 and reflected input and contributions from the Open Space Task Force, the community meetings and numerous city agencies. The Department received numerous comments from the community as well as public agencies. A revised Draft was published in June 2011, incorporating all comments and input received, followed by a hearing at the Planning Commission on August 4, 2011 to initiate adoption of the updated ROSE. The Commission and staff heard further comments at and

Memo to Planning Commission Hearing Date: April 3, 2014

CASE NO. 2010.0641M General Plan Amendment updating the Recreation and Open Space Element of the General Plan

subsequent to the hearing from certain stakeholders. In the following months, the Department worked closely with these stakeholders to understand their remaining concerns through multiple targeted working group meetings. This final round of community outreach along with further coordination with public agencies resulted in further edits and a publication of an updated "Final" Draft ROSE in December 2013. This draft was presented first in a stakeholder meeting in November and then in a public open house in December.

Following the release of the draft in December 2013, Planning Department staff attended the Parks and Recreation Advisory Committee, attended a Coalition for San Francisco Neighborhoods meeting, presented once at the Recreation and Parks Commission and twice at the Historic Preservation Commission, and has held one-on-one meetings with stakeholders. The Department has received several comments and staff has carefully considered each comment, made some additional edits to the Draft ROSE, and prepared detailed responses to each comment in the Public Comments Response to those Comments Document (included in the commission packet on March 13, 2014), indicating how the proposed Draft ROSE addresses each comment.

REQUIRED COMMISSION ACTION

Adopt amendments to the Recreation and Open Space Element of the General Plan.

The resolution for adoption, draft ordinance, and Final Negative Declaration are included in this Commission packet. On March 13, 2014 staff provided copies of the Final Draft Recreation and Open Space Element and a copy of all public comments and staff's response to those comments. The Final Draft ROSE and the public comments and our responses to those comments are also available online at http://www.openspace.sfplanning.org or by contacting staff.

ENVIRONMENTAL REVIEW

The Final Negative Declaration was published on March 27, 2014 and is included in this Commission packet.

RECOMMENDATION:	Adoption of General Plan Amendments related to the update to the	
	Recreation and Open Space Element	

Attachments:

- 1. Resolution for Adoption
- 2. Legislative Digest
- 3. Ordinance for Adoption
- 4. Final Negative Declaration

ATTACHMENT 2
Resolution
Hearing Date: April 3, 2014

CASE NO. 2010.0641M

General Plan Amendment updating the Recreation & Open Space Element of the General Plan

SAN FRANCISCO PLANNING COMMISSION RESOLUTION NO.

ADOPTING AMENDMENTS TO THE SAN FRANCISCO GENERAL PLAN, TO UPDATE THE RECREATIONAL AND OPEN SPACE ELEMENT ("ROSE"); MAKING FINDINGS, INCLUDING FINDINGS OF CONSISTENCY WITH THE GENERAL PLAN, PRIORITY POLICIES OF PLANNING CODE SECTION 101; AND FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, Section 4.105 of the Charter of the City and County of San Francisco mandates that the Planning Commission shall periodically recommend to the Board of Supervisors for approval or rejection proposed amendments to the General Plan.

The Planning Department, in cooperation with the Recreation and Parks Department and in consultation with other City agencies, developed an update to the Recreation and Open Space Element of the General Plan, hereineafter the Element, through a comprehensive community-based planning effort. Beginning with the establishment of an Open Space Task Force in November 2007, the Department worked closely with community leaders, stakeholders, City agencies, and community members across numerous fora to develop open space goals, policies and objectives for the update. The proposed General Plan Amendment of the Element was developed from feedback received through those fora. Staff recommends adoption of the draft Resolution to initiate proposed amendments to the General Plan.

Planning Code Section 101.1(b) establishes eight priority policies and is the basis by which differences between competing policies in the General Plan are resolved. The project is consistent with the eight priority policies, in that:

1. That existing neighborhood serving retail uses be preserved and enhanced and future opportunities for resident employment in or ownership of such businesses enhanced.

The Element calls for the expansion and improvement of the City's open space network and its recreational opportunities. Numerous studies have illustrated that open space opportunities make an area more attractive for investment, by attracting and expanding local businesses, by increasing tourism and by enhancing property values.

2. That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.

The Element includes objectives and policies that support the improvement of the City's parks, streets and public spaces, in accordance with the needs of their surrounding neighborhoods. It states that new acquisitions should be designed with their neighborhood populations in mind, and that existing spaces should be redesigned to better serve the needs of their neighborhoods, while ensuring that the spaces are flexible to adapt to changing neighborhood needs. It also promotes the development of cultural programming and activities in open spaces.

3. That the City's supply of affordable housing be preserved and enhanced.

The Element will not affect the City's supply of affordable housing. It does however prioritize the acquisition of new space and renovation of existing space in "high needs" areas, where the City's low-income and minority populations tend to be concentrated, and therefore will support the existence of affordable housing with open space and recreational opportunities.

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Recreation and Open Space Element of the General Plan

4. That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking.

The Element will not increase commuter traffic, and it encourages alternative modes of transportation – transit, bicycle and pedestrian access—to and from open spaces.

That a diverse economic base be maintained by protecting our industrial and service sectors from displacement due to commercial office development, and that future opportunities for resident employment and ownership in these sectors be enhanced.

The Element would not adversely affect the industrial or service sectors.

6. That the City achieves the greatest possible preparedness to protect against injury and loss of life in an earthquake.

The Element would not adversely affect the City's preparedness in the face of an earthquake. It supports recycling and reuse of water, as well as water conservation, which will assist in the event of water shortages caused by an earthquake.

7. That landmarks and historic buildings be preserved.

The Element would not have a negative effect on the preservation of landmarks and historic buildings.

8. That our parks and open space and their access to sunlight and vistas be protected from development.

The Element contains policies to preserve sunlight in public open space and preserves Planning Code regulations which prohibit the construction of buildings which cast shadow on Recreation and Park Department spaces.

The development of the Recreation and Open Space Element Update *was* coordinated with existing General Plan policies. Analysis of applicable General Plan Objectives and Policies has determined that the proposed action is, on balance, consistent with the General Plan as it is proposed to be amended. The proposed revisions support many concepts outlined in the General Plan. Below are specific policies and objectives that support the proposed actions.

NOTE: General Plan Elements are in *CAPITAL ITALICS*General Plan Objectives are in CAPITAL LETTERS
General Plan Policies are in Arial standard font

TRANSPORTATION ELEMENT

- POLICY 24.5 Where consistent with transportation needs, transform streets and alleys into neighborhood-serving open spaces...
- OBJECTIVE 26 CONSIDER THE SIDEWALK AREA AS AN IMPORTANT ELEMENT IN THE CITYWIDE OPEN SPACE SYSTEM.
- POLICY 26.1 Retain streets and alleys not required for traffic...
- POLICY 26.2 Close certain streets not required as traffic carriers for pedestrian use...
- POLICY 26.3 Establish frequent and convenient transit service, including water-based transit, to major recreational facilities...
- POLICY 27.9 Identify and expand recreational bicycling opportunities.

The Recreation and Open Space Element recognizes living streets, living alleys and streetscape improvements as an important supplement to traditional open space. It contains policies that call for improving access and connectivity to open space which includes transit, bicycling and pedestrian access.

URBAN DESIGN ELEMENT

SAN FRANCISCO
PLANNING DEPARTMENT

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POLICY 1.4	Protect and promote large-scale landscaping and open space that define districts and topography.
POLICY 2.2	Limit improvements in other open spaces having an established sense of nature to those that are necessary
POLICY 3.4	Promote building forms that will respect and improve the integrity of open spaces and other public areas.
POLICY 4.8	Provide convenient access to a variety of recreation opportunities.
POLICY 4.9	Maximize the use of recreation areas for recreational purposes.
POLICY 4.10	Encourage or require the provision of recreation space in private development.
POLICY 4.11	Make use of street space and other unused public areas for recreation

The Recreation and Open Space Element update emphasizes the need to preserve open space and specifies criteria for any encroachment from other uses. Such criteria assure a no loss of quantity and quality of open space. The Recreation and Open Space Element also recognizes the role of private open space in private developments and establishes that such private open space should be of high quality.

ENVIRONMENTAL PROTECTION ELEMENT

POLICY 7.1 Preserve and add to public open space...

The Recreation and Open Space Element Update focuses both on preserving existing open space, ensuring dynamic and flexible use of our existing open space, as well as acquiring new open spaces especially in areas of the city identified with high needs for open space.

BALBOA PARK AREA PLAN

- POLICY 5.1 Create A System Of Public Parks, Plazas And Open Spaces In The Plan Area.
- POLICY 5.2 Create Open Space Within New Development That Contributes To The Open Space System
- POLICY 5.4 Create An Space System That Both Beautifies The Neighborhood And Strengthens The Environment.

The Recreation and Open Space Element Update defines the open space system in the city as to include traditional parks as well as urban plazas and living streets. It also includes policies that highlight the need for environmentally sustainable design when constructing new open space or renovating existing ones.

BAYVIEW HUNTERS POINT AREA PLAN

- POLICY 12.1 Make better use of existing recreation facilities.
- POLICY 12.2 Maximize joint use of recreation and education facilities.
- POLICY 12.3 Renovate and expand Bayview's parks and recreation facilities, as needed.

The Recreation and Open Space Element Update encourages dynamic and flexible use of existing open space recognizing the need to better utilize our existing open space resources. Other policies prioritize renovation of underutilized open spaces, support development of signature open space along the shoreline, and call for a region serving open space at Hunters Point Shipyard.

CENTRAL WATERFRONT, EAST SOMA (SOUTH OF MARKET), MISSION AND SHOWPLACE SQUARE/POTRERO HILL AREA PLAN

- POLICY 5.1 Provide Public Parks And Open Spaces That Meet The Needs Of Residents, Workers And Visitors.
- POLICY 5.2 Ensure That New Development Includes High Quality Private Open Space.
- POLICY 5.3 Create A Network Of Green Streets That Connects Open Spaces And Improves The Walkability, Aesthetics, And Ecological Sustainability Of The Neighborhood.
- POLICY 5.4 The Open Space System Should Both Beautify The Neighborhood And Strengthen The Environment.
- POLICY 5.5 Ensure That Existing Open Space, Recreation And Park Facilities Are Well Maintained.

SAN FRANCISCO
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The Recreation and Open Space Element Update responds to community needs and changing demographics when providing new open space or renovating or programing existing open space. It also contains policies on improving access and connectivity to open space and specifically creating a network of green connections that increases access to parks, open spaces, and the waterfront. Other policies highlight maintenance and repair of open space to modern standards in order to guarantee enjoyment of the open space.

CHINATOWN AREA PLAN

Hearing Date: April 3, 2014

POLICY 4.4 Expand open space opportunities.

The Element update contains policies to acquire new open space in high needs areas of the City which are areas with high population density, high density of seniors, children and youth, and low income population, and low access to open space, as well as growth areas in the city.

CIVIC CENTER

Resolution

POLICY 1.3 Design Civic Center buildings and open spaces to serve as public gathering places for ceremonial, cultural, recreational, and other community activities.

The Element specifically supports the development of civic serving open spaces, including a series of connected open spaces along a civic center "axis".

DOWNTOWN PLAN

- OBJECTIVE 9 PROVIDE QUALITY OPEN SPACE IN SUFFICIENT QUANTITY AND VARIETY TO MEET THE NEEDS OF DOWNTOWN WORKERS, RESIDENTS, AND VISITORS.
- POLICY 9.1 Require usable indoor and outdoor open space, accessible to the public, as part of new downtown development.
- POLICY 9.2 Provide different kinds of open space downtown.
- POLICY 9.3 Give priority to development of two categories of highly valued open space; sunlit plazas and parks.
- POLICY 9.4 Provide a variety of seating arrangements in open spaces throughout downtown.
- POLICY 9.15 Improve the usefulness of publicly owned rights-of-way as open space.
- OBJECTIVE 10 ASSURE THAT OPEN SPACES ARE ACCESSIBLE AND USABLE.
- POLICY 10.1 Develop an open space system that gives every person living and working downtown access to a sizable sunlit open space within convenient walking distance.
- POLICY 10.2 Encourage the creation of new open spaces that become a part of an interconnected pedestrian network.
- POLICY 10.3 Keep open space facilities available to the public.
- POLICY 10.4 Provide open space that is clearly visible and easily reached from the street or pedestrian way.
- POLICY 10.5 Address the need for human comfort in the design of open spaces by minimizing wind and maximizing sunshine.

The Recreation and Open Space Element highlights the need for open space in dense areas of the city especially in downtown and calls for measures to ensure such open spaces are accessible, usable and activated. Other policies in the Recreation and Open Space Element emphasize preserving sunlight in public open spaces as well as safety and security for the public in open spaces.

HUNTERS POINT AREA PLAN

OBJECTIVE 7CREATE A WORLD CLASS SYSTEM OF OPEN SPACE THAT INCLUDES A SIGNIFICANT PORTION OF THE OVERALL HUNTERS POINT SHIPYARD, ENABLES IMPROVEMENTS THE SHORELINE ENHANCES ACCESS, PROVIDES A WIDE RANGE OF RECREATIONAL AND ECOLOGICAL RESTORATION OPPORTUNITIES, AND IS SEAMLESSLY INTEGRATED WITH THE EXISTING NEIGHBORHOOD.

AN FRANCISCO PLANNING DEPARTMENT 4 Resolution **CASE NO. 2010.0641 M** Hearing Date: April 3, 2014 General Plan Amendment updating the Recreation and Open Space Element of the General Plan

POLICY 7.1 Provide a wide variety of types and scale of open space with a wide variety of recreational and conservation opportunities.

Celebrate the history of the site, including the history of indigenous populations, by POLICY 7.2 incorporating interpretive elements throughout the development.

The Element Update encourages dynamic and flexible use of existing open space recognizing the need to better utilize our existing open space resources. Other policies prioritize renovation of underutilized open spaces, support development of signature open space along the shoreline, and call for a region serving open space at Hunters Point Shipyard.

MARKET AND OCTAVIA AREA PLAN

POLICY 4.1.7 Introduce traffic-calming measures on residential alleys and consider making improvements to alleys with a residential character to create shared, multipurpose public space for the use of residents.

The Recreation and Open Space Element recognizes living streets, living alleys and streetscape improvements as an important supplement to traditional open space and it calls for creative solutions to transform such public right of ways into open space.

NORTHEASTERN WATERFRONT

- POLICY 2.4 Promote the development of new maritime activities, public open space and public access improvements as part of major new development on piers.
- Emphasize water-related recreation, Bay-oriented commercial recreation and Bay-POLICY 2.5 oriented public assembly uses in non-maritime development adjacent to, or over, the water.

The Element Update encourages development of signature open space along the shoreline and calls for dynamic and flexible use of existing open space recognizing the need to better utilize our existing open space resources.

RINCON HILL AREA PLAN

- Create a Variety of New Open Spaces and Community Facilities... POLICY 4.1
- Create a New Neighborhood Park to Serve the District POLICY 4.2
- POLICY 4.3 Link the Area Via Pedestrian Improvements to Major Open Spaces...
- POLICY 4.4 Ensure Adequate Sunlight and Minimize Wind and Shadow on Public Streets and Open Spaces
- POLICY 4.6 Create an Inviting and Pleasant Mid-Block Pedestrian Corridor to the Waterfront
- POLICY 4.7 Require Private Development to Contribute to the Creation, Maintenance, and Operations of Open Spaces and Community Facilities...

The Element Update contains policies to acquire new open space especially in areas of the city with high needs for open space. Other policies also stress connectivity between parks and improvements for access to parks. The Element also recognizes the funding challenges around maintenance of parks and encourages innovative funding mechanisms to maintain parks and open spaces.

VAN NESS AVENUE

- POLICY 7.2 Provide Wind Protection and Sun Exposure in Open Space Areas POLICY 7.3 Maintain Existing Open Space Requirements for Residential Use
- The Element underscores the importance of requirements for private residential open space and further calls for ensuring such open space is developed at high quality. Preserving sunlight in open spaces is also specifically featured in the Element as a city policy.

WESTERN SHORELINE

- POLICY 2.2 Maintain the Landscaped Recreational Corridor to Link with Other Parks
- POLICY 2.3 Provide for a Continuation of the Bicycle Trail

SAN FRANCISCO
PLANNING DEPARTMENT 5 Resolution CASE NO. 2010.0641 M
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Recreation and Open Space Element of the General Plan

POLICY 2.4 Improve Public Access to Ocean Beach from Golden Gate Park

POLICY 2.5 Develop and Revise Golden Gate Park Plans to Improve Recreational Access in the Western Portion

OBJECTIVE 6 Maintain and Enhance the Recreational Use of the Ocean Beach Shoreline

OBJECTIVE 7 Preserve and Restore Sutro Heights Park

POLICY 8.1 Develop the Cliff House/Sutro Bath Area as a Nature-Oriented Shoreline Park

The Recreation and Open Space Element identifies Golden Gate Park as a valuable open space resource, and encourages further improvements to the park while preserving its beauty and landscape. Other policies emphasize the need for signature open spaces along the shoreline. The new policies also stress the need for improvements to accessing parks whether with transit or by bicycle or on foot.

WHEREAS, a Preliminary Negative Declaration (PND) for the Project was prepared and published for public review on February 19, 2014; and

WHEREAS, the PND was available for public comment until March 26, 2014; and

WHEREAS, on March 27, 2014, the Planning Commission reviewed and considered the Final Negative Declaration (FND) and found that the contents of said report and the procedures through which the FND was prepared, publicized, and reviewed complied with the California Environmental Quality Act (California Public Resources Code Sections 21000 et seq.) (CEQA), 14 California Code of Regulations Sections 15000 et seq. (the "CEQA Guidelines") and Chapter 31 of the San Francisco Administrative Code ("Chapter 31"): and

WHEREAS, the Planning Commission found the FND was adequate, accurate and objective, reflected the independent analysis and judgment of the Department of City Planning and the Planning Commission, and approved the FND for the Project in compliance with CEQA, the CEQA Guidelines and Chapter 31; and

WHEREAS, the Planning Department, Jonas Ionin, is the custodian of records, located in File No. 2010.0641M, at 1650 Mission Street, Fourth Floor, San Francisco, California; now therefore, be it

RESOLVED, That the Planning Commission has reviewed and considered the FND and the record as a whole and finds that there is no substantial evidence that the Project will have a significant effect on the environment, and hereby adopts the FND; and, be it

NOW, THEREFORE BE IT RESOLVED, that pursuant to Planning Code Section 340, the Planning Commission finds the proposed amendments would serve the public necessity, convenience and general welfare, and for that reason adopts a Resolution to Adopt amendments to the General Plan of the City and County of San Francisco, in order to update the Recreation and Open Space Element of the General Plan, as set forth in the General Plan amendment ordinance for the proposed update, which is incorporated by reference as if fully set forth herein.

I hereby certify that the foregoing Resolution was ADOPTED by the City Planning Commission on April 3, 2014.

Jonas Ionin
Commission Secretary

AYES: NOES: ABSENT:

ADOPTED: April 3, 2014

SAN FRANCISCO
PLANNING DEPARTMENT

LEGISLATIVE DIGEST

[General Plan – Amendments Related to the 2014 Update of the Recreation and Open Space Element]

Ordinance amending the San Francisco General Plan by adding the Glen Park Area Plan; and making findings, including environmental findings and findings of consistency with the General Plan and the Priority Policies of Planning Code Section 101.1.

Existing Law

The General Plan of the City and County of San Francisco is a planning document that sets a strategic and long term vision for the City. State law requires that the General Plan address seven issues: land use, circulation, housing, conservation, open space, noise and safety. In addition, a general plan can also contain area plans, which cover specific geographic areas of a city.

Amendments to Current Law

This Ordinance would amend the Recreation and Open Space Element (ROSE) of the General Plan. The ROSE is a policy document that consists in general objectives and policies to guide comprehensive long-term planning, conservation and use of open space and recreational facilities.

Background Information

San Francisco last updated the ROSE in 1986.

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FILE NO. ORDINANCE NO. [General Plan – Amendments Related to the 2014 Update of the Recreation and Open Space Element.] Ordinance amending the San Francisco General Plan by updating the Recreational and Open Space Element of the San Francisco General Plan; making findings, including environmental findings and findings of consistency with the General Plan and the eight Priority Policies of the Planning Code Section 101.1. Note: Additions are single-underline italics Times New Roman; deletions are strikethrough italies Times New Roman. Board amendment additions are double underlined. Board amendment deletions are strikethrough normal. Be it ordained by the People of the City and County of San Francisco: Section 1. Findings. Α. Section 4.105 of the Charter of the City and County of San Francisco provides that the Planning Commission shall periodically recommend to the Board of Supervisors, for approval or rejection, proposed amendments to the General Plan. B. On the Board of Supervisors received from the Planning Department a proposed General Plan amendment which updates the Recreational and Open Space Element ("ROSE") of the San Francisco General Plan. C. Section 4.105 of the City Charter further provides that if the Board of Supervisors fails to Act within 90 days of receipt of the proposed Housing Element Update Amendment, then the proposed amendment shall be deemed approved. D. San Francisco Planning Code Section 340 provides that an amendment to the

General Plan may be initiated by a resolution of intention by the Planning Commission, which

refers to, and incorporates by reference, the proposed General Plan amendment. Section

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PLANNING COMMISSION

1	the ROSE update are on file with the Clerk of the Board in File No These and any
2	and all other documents referenced in this Ordinance have been made available to, and have
3	been reviewed by, the Board of Supervisors, and may be found in either the files of the City
4	Planning Department, as the custodian of records, at 1650 Mission Street in San Francisco, or
5	in Board File No with the Clerk of the Board of Supervisors at 1 Dr. Carlton B.
6	Goodlett Place, San Francisco and incorporated herein by reference.
7	I. The Board of Supervisors has reviewed and considered the FND and the
8	environmental documents on file referred to herein. The Board of Supervisors has reviewed
9	and considered the CEQA Findings adopted by the Planning Commission in support of the
10	approval of the ROSE update, and hereby adopts as its own and incorporates the CEQA
11	Findings contained in Planning Commission Resolution by reference as though
12	such findings were fully set forth in this Ordinance.
13	J. The Board of Supervisors finds that since the FND was finalized, there have
14	been no substantial project changes and no substantial changes in project circumstances that
15	would require major revisions to the FND due to the involvement of new significant
16	environmental effects or an increase in the severity of previously identified significant impacts,
17	and there is no new information of substantial importance that would change the conclusions
18	set forth in the FND.
19	K. The Board of Supervisors finds, pursuant to Planning Code Section 340, that the
20	ROSE update set forth in the documents on file with the Clerk of the Board in File
21	No will serve the public necessity, convenience and general welfare for the reasons
22	set forth in Planning Commission Resolution No and incorporates those reasons
23	herein by reference.
24	L. The Board of Supervisors finds that the ROSE update as set forth in the
25	documents on file with the Clerk of the Board in Board File No, is in conformity with

1	the General Plan and the eight priority policies of Planning Code Section 101.1 for the		
2	reasons set forth in Planning Commission Resolution No The Board hereby		
3	adopts the findings set forth in Planning Commission Resolution No and		
4	incorporates those findings herein by reference.		
5	Section 2. The Board of Supervisors hereby amends the San Francisco General Plan		
6	by adopting the 2014 ROSE update, as recommended to the Board of Supervisors by the		
7	Planning Commission on, and referred to above.		
8			
9			
10	APPROVED AS TO FORM:		
11	DENNIS J. HERRERA, City Attorney		
12	By:		
13	Andrea Ruiz-Esquide Deputy City Attorney		
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PLANNING COMMISSION

Negative Declaration

Date: March 27, 2014; amended on March 27, 2014

(Amendments to the PND are shown in deletions as strikethrough;

additions in double underline)

Case No.: **2010.0641E**

Project Title: General Plan Recreation and Open Space Element (ROSE) Update

Project Sponsor: San Francisco Planning Department

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PROJECT DESCRIPTION:

The proposed project consists of an update (amendment) of the existing, 1986 Recreation and Open Space Element (ROSE) of the San Francisco General Plan. The ROSE is a policy document that consists of general objectives and policies to guide comprehensive long-term planning, conservation and use of open space land and recreational facilities. California state law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning." General plans are intended to underlie most land use decisions. The draft 2013 ROSE Update contains six objectives, with policies under each of the objectives. The objectives and policies in the existing, 1986 ROSE are proposed to be revised as follows: 1) the entire document is reorganized to eliminate distinctions between different types of open spaces (e.g., City-serving, District serving, Neighborhood-serving, etc.); 2) some objectives and policies are re-worded to reflect the concepts of the Open Space Framework; and 3) new policies are added based on community input.

The Approval by the Board of Supervisors is the Approval Action for the whole of the proposed project.

FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

In the independent judgment of the Planning Department, there is no substantial evidence that the project could have a significant effect on the environment.

SARAH B. JONES
Environmental Review Officer

March 27, 2014

Date of Adoption of Final Negative Declaration

cc:

Sue Exline, Project Contact

Historic Preservation Distribution List

Distribution List

Virna Byrd, M.D.F

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INITIAL STUDY

GENERAL PLAN RECREATION AND OPEN SPACE ELEMENT (ROSE) UPDATE PLANNING DEPARTMENT CASE NO. 2010.0641E

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INITIAL STUDY GENERAL PLAN RECREATION AND OPEN SPACE ELEMENT (ROSE) UPDATE PLANNING DEPARTMENT CASE NO. 2010.0641E

A. PROJECT DESCRIPTION

Background

This Initial Study is a review and evaluation of the Planning Department's proposed update (amendment) to the Recreation and Open Space Element (ROSE) of the *San Francisco General Plan* ("General Plan"). The ROSE is a policy document that consists of general objectives and policies to guide comprehensive long-term planning, conservation and use of open space land and recreational facilities. California state law requires each city and county to adopt a general plan "for the physical development of the county or city, and any land outside its boundaries which bears relation to its planning" (CA Government Code §65300). General plans are intended to underlie most land use decisions. State law requires that subdivisions, capital improvements, development agreements, and many other land use actions be consistent with a city or county's adopted general plan.

San Francisco's General Plan serves to:

- Identify the community's land use, circulation, environmental, economic, and social goals and policies as they relate to land use and development.
- Provide a basis for local government decision-making, including decisions on development approvals and exactions.
- Provide citizens with opportunities to participate in the planning and decision-making processes of their communities.
- Inform citizens, developers, decision-makers, and other cities and counties of the ground rules that guide development within a community. Protect, preserve, and enhance the economic, social, cultural, and esthetic values that establish the desirable quality and unique character of the city.
- Improve the city as a place for living, by aiding in making it more healthful, safe, pleasant, and satisfying, with housing representing good standards for all residents and by providing adequate open spaces and appropriate community facilities.
- Improve the city as a place for commerce and industry by making it more efficient, orderly, and satisfactory for the production, exchange and distribution of goods and services, with adequate space for each type of economic activity and improved facilities for the loading and movement of goods.

- Coordinate the varied pattern of land use with public and semi-public service facilities required for efficient functioning of the city, and for the convenience and well-being of its residents, workers, and visitors.
- Coordinate the varied pattern of land use with circulation routes and facilities required for the efficient movement of people and goods within the city, and to and from the city.
- Coordinate growth and development of the city with the growth and development of adjoining cities and counties and of the San Francisco Bay Region.

The manner in which the general goals are to be attained is set forth through a statement of objectives and policies in a series of elements that deal with a particular topic, applicable citywide. The General Plan includes "elements" that address state-mandated issues, additional non-mandatory elements that relate to San Francisco's physical development, a Land Use Index, Area Plans. General Plan currently contains and also The 10 elements: Housing, Commerce and Industry, Recreation and Open Space, Community Facilities, Transportation, Community Safety, Environmental Protection, Air Quality, Urban Design and Arts. The Land Use Index cross-references the policies related to land use located throughout the General Plan. An update to the ROSE is the subject of this Initial Study.

In addition to the 10 elements, which may be added from time to time, the General Plan also contains 18 Area Plans.¹ Area Plans are not mandated sections of the General Plan and focus on a particular geography of the City. They refine General Plan policies as they apply to a smaller geographic area and are implemented by ordinances and other discretionary actions. State law requires area plans to be internally consistent with the General Plan. The General Plan elements and Area Plans use a common format for land use categories, terminology, and diagrams.

Open Space Framework

The project sponsor, the San Francisco Planning Department, in conjunction with all City and County of San Francisco (City) agencies with Open Space jurisdiction, is proposing an update to the ROSE. The ROSE is a policy document that consists of general objectives and policies to guide comprehensive long-term planning, conservation and use of open space land. San Francisco last updated the ROSE in 1986. State law requires that a city's General Plan and its elements be periodically updated in order to prepare for its future. The update to the ROSE and content analyzed in this Initial Study is a product of a community-based planning process. Its goals are to better utilize existing open spaces, improve access to open space, and prioritize acquisitions and renovations of parks and open spaces in areas of high need for such space. The broad

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¹ Currently, the General Plan's Area Plans include: Downtown, Chinatown, Rincon Hill, Civic Center, Van Ness Avenue, Western Shoreline, Northeastern Waterfront, Market and Octavia, Central Waterfront, East SoMa, Mission, Showplace Square/Potrero Hill, and Bayview Hunters Point (formerly South Bayshore) and Hunters Point Shipyard, Glen Park, Balboa Park Station Area Plan, Western SoMa, and Transit Center District Plan. As of 2014, the Central SoMa Plan (formerly Central Corridor Plan) is under review and may be formally adopted as an Area Plan for inclusion within the General Plan.

principles of the Open Space Framework, developed in conjunction with public input, are as follows:

Multi-functionality: A major theme developed from the public outreach process was the concept of "making the most of what we have," that is, utilizing and improving the expansive network of open and natural spaces the City already provides. A variety of open space types should be integrated within the City's existing spaces, by layering functions and uses to create high-performing open spaces. An integrated open space network includes streets, alleyways, creeks, parks, habitat areas, urban forests, trails, recreational facilities, shorelines, commercial and civic spaces, backyards, and even buildings, as components of a multifunctional system.

Sense of Place: The Open Space Framework promotes San Francisco's role as a regional epicenter for ecological, economic, and cultural diversity. It is intended to build on the City's intrinsic qualities, both natural and cultural, and to reflect the values the City places on cultural diversity and biodiversity. Furthermore, it aims to create a network that inspires a deep connection to place.

Equity and Accessibility: The Open Space Framework focuses on ensuring equitable distribution of open space and recreational programs. It is intended to provide access for all residents, workers and visitors, and works towards a democratic network that includes all neighborhoods in the benefits of a multi-functional open space system.

Connectivity: The Open Space Framework envisions a wholly connected network of open spaces. Such a system is intended to facilitate non-motorized movement, link diverse neighborhoods, be easy to navigate and understand and, where feasible, enhance habitat through connectivity.

Health and Safety: The Open Space Framework uses open space as a way to increase the City's capacity as a safe and healthy place to live. It promotes social interaction, wellness, and a healthy lifestyle by providing opportunities for exercise, physical activity, cultural and social activities, and a connection to nature.

Ecological Function and Integrity: With environmental sustainability as a driving theme, the Open Space Framework seeks to expand the quantity and quality of natural systems in the City, by promoting aquatic and terrestrial biodiversity, by designing for watershed health, and by implementing environmental, ecological and conservation-minded strategies.

Sustaining Stewardship: The Open Space Framework aims to engage San Francisco's residents as active, involved participants in the City's future. Policies work towards shared, continued stewardship that increases the tangible link between citizens and their open space network. It seeks to create partnerships between public agencies, private business, and individual citizens to foster pride, purpose and community.

Description of Draft 2013 ROSE Update and Policy Context

The draft 2013 ROSE Update contains six objectives, with policies under each of the objectives, shown in Table 1, below, with the existing objectives and policies revised as follows: 1) the entire document is reorganized to eliminate distinctions between different types of open spaces (e.g., City-serving, District-serving, Neighborhood-serving, etc.) in the existing, 1986 ROSE; 2) some objectives and policies are re-worded to reflect the concepts of the Open Space Framework; and 3) new policies are added based on community input.

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Table 1: Proposed and Existing Recreation and Open Space Element Objectives and Policies

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
OBJECTIVE 1	
ENSURE A WELL-MAINTAINED, HIGHLY UTILIZED,	
AND INTEGRATED OPEN SPACE SYSTEM	
POLICY 1.1	POLICY 4.1
Encourage the dynamic and flexible use of existing open	Make better use of existing facilities.
spaces and promote a variety of open space uses, where	Make better use of existing ruenties.
appropriate.	
POLICY 1.2	POLICY 4.3
Prioritize renovation in highly-utilized open spaces and in	Renovate and renew the City's parks and recreation
high needs areas.	facilities.
DOLLOV 1.2	DOLLOV 2.2
POLICY 1.3	POLICY 2.2 Processing public appropriate
Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses,	Preserve existing public open space.
assuring no loss of quantity or quality of open space.	
POLICY 1.4	POLICY 3.2
Maintain and repair open spaces to modern maintenance	Maintain and improve the quality of existing shoreline
standards.	open space.
POLICY 1.5	POLICY 2.11
Prioritize the activation of McLaren Park, Ocean Beach,	Develop McLaren Park into t high-quality, city-serving
the Blue Greenway and other underutilized significant	park.
open space.	
POLICY 1.6	POLICY 2.10
Support the continued improvement of Golden Gate Park	Develop a master plan for Golden Gate Park.
while preserving the beauty of its naturalistic landscape.	
POLICY 1.7	
Support public art as an essential component of open	
space design. POLICY 1.8	POLICY 2.12
Support urban agriculture and local food security through	Expand community garden opportunities throughout the
development of policies and programs that encourage	City.
food production throughout San Francisco.	ony.
POLICY 1.9	POLICY 2.3
Preserve sunlight in public open spaces.	Preserve sunlight in public open spaces.
POLICY 1.10	
Ensure that open space is safe and secure for the City's	
entire population.	
POLICY 1.11	
Encourage private recreational facilities on private land	
that provide a community benefit, particularly to low- and	
moderate-income residents.	
POLICY 1.12 Preserve historic and culturally significant landscapes,	
sites, structures, buildings and objects.	
POLICY 1.13	
Preserve and protect character-defining features of	
historic resources in City parks, when it is necessary to make alterations to accommodate new needs or uses.	
make alterations to accommodate new needs of uses.	

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
OBJECTIVE 2	
INCREASE OPEN SPACE TO MEET THE LONG-TERM NEEDS OF THE CITY AND BAY REGION	
POLICY 2.1	POLICY 2.1
Prioritize acquisition of open space in high needs areas.	Provide an adequate total quantity and equitable distribution of public open spaces throughout the City.
	POLICY 2.7 Acquire additional open space for public use.
	POLICY 4.4 Acquire and develop new public open space in existing residential neighborhoods, giving priority to areas which are most deficient in open space.
POLICY 2.2 Provide and promote a balanced recreation system which offers a variety of high quality recreational opportunities for San Franciscans.	
POLICY 2.3 Provide recreational programs that are responsive to	
community needs and changing demographics. POLICY 2.4	POLICY 3.1
Support the development of signature public open spaces along the shoreline.	Assure that new development adjacent to the shoreline capitalizes on its unique waterfront location, considers shoreline land use provisions, improves visual and physical access to the water, and conforms with urban design policies.
	POLICY 3.4 Create a visually and physically accessible urban waterfront along the Embarcadero corridor between Fisherman's Wharf and China Basin.
	POLICY 3.5 Provide new public open spaces along the shoreline.
POLICY 2.5	POLICY 1.1
Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, Candlestick and Hunters Point Shipyard.	Protect the natural character of regional open spaces and place high priority on acquiring new open spaces noted for unique natural qualities.
POLICY 2.6	
Support the development of civic-serving open spaces.	
POLICY 2.7 Expand partnerships with open space agencies, transit agencies, private sector and nonprofit institutions to acquire, develop and/or manage existing open spaces	POLICY 1.4 Coordinate with regional parks districts, open space agencies, private sector and non-profit institutions to acquire and manage a regional greenbelt.
POLICY 2.8 Consider repurposing underutilized City-owned property as open space.	
POLICY 2.9 Address physical and bureaucratic barriers to opening schoolyards as community open space during non-school hours.	POLICY 4.2 Maximize joint use of other properties and facilities.

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
POLICY 2.10	POLICY 1.2
Improve access to and level of activity provided at San Francisco reservoirs.	Make open space lands already in public ownership accessible to the public for compatible recreational uses.
POLICY 2.11	POLICY 4.5
Assure that privately developed residential open spaces are usable, beautiful, and environmentally sustainable.	Require private usable outdoor open space in new residential development.
	POLICY 4.6 Assure the provision of adequate public open space to serve new residential development.
POLICY 2.12 Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated.	
(policy remove)	POLICY 2.5 Preserve the open space and natural historic, scenic and recreational features of the Presidio.
OBJECTIVE 3 IMPROVE ACCESS AND CONNECTIVITY TO OPEN SPACE	OBJECTIVE 4 PROVIDE OPPORTUNITIES FOR RECREATION AND ENJOYMENT OF OPEN SPACE IN EVERY SAN FRANCISCO NEIGHBORHOOD
POLICY 3.1	POLICY 4.7
Creatively develop existing publicly-owned rights-of-way and streets into open space.	Provide open space to serve neighborhood commercial districts.
POLICY 3.2 Establish and implement a network of Green Connections that increases access to parks, open spaces, and the waterfront.	
POLICY 3.3 Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering historic water courses to improve stormwater management.	POLICY 1.3 Increase the accessibility of regional parks by locating new parks near population centers, establishing low user costs, improving public transit service to parks and creating bike and hiking trails.
	POLICY 2.8 Develop a citywide urban trails system that links city parks and public open spaces, hilltops, the waterfront and neighborhoods and ties into the regional hiking trail system.
	POLICY 3.3 Create a trail around the perimeter of the City which links open space along the shoreline and provides for maximum waterfront access.

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
POLICY 3.4	POLICY 1.3
Encourage non-auto modes of transportation – transit,	Increase the accessibility of regional parks by locating
bicycle and pedestrian access – to and from open spaces	new parks near population centers, establishing low user
while reducing automobile traffic and parking in public	costs, improving public transit service to parks and
open spaces.	creating bike and hiking trails.
open spaces.	Grouning and rinking trails.
	POLICY 2.4
	Gradually eliminate non-recreational uses in parks and
	playground and reduce automobile traffic in and around
	public open spaces.
POLICY 3.5	POLICY 2.6
Ensure that open space is physically accessible,	Make open space accessible to people with special
especially for those with limited mobility.	needs.
POLICY 3.6	POLICY 2.9
Maintain, restore, expand and fund the urban forest.	Maintain and expand the urban forest.
OBJECTIVE 4	
PROTECT AND ENHANCE THE BIODIVERSITY,	
HABITAT VALUE, AND ECOLOGICAL INTEGRITY OF	
OPEN SPACES	
POLICY 4.1	POLICY 2.13
Protect, preserve and restore local biodiversity.	Preserve and protect natural resources.
POLICY 4.2	POLICY 1.1
Establish a coordinated management approach for	Protect the natural character of regional open spaces and
designation and protection of natural areas and	place high priority on acquiring new open spaces noted
watershed lands.	for unique natural qualities.
	1 1
POLICY 4.3	
Integrate the protection and restoration of local	
biodiversity into all open space construction, renovation,	
management and maintenance using environmentally	
sustainable design principles.	
DOLLOV 4.4	
POLICY 4.4	
Include environmentally sustainable practices in	
<u>construction, renovation, management and maintenance</u> <u>of open space and recreation facilities.</u>	
OBJECTIVE 5	
ENGAGE COMMUNITIES IN THE STEWARDHIP OF	
THEIR RECREATION PROGRAMS AND OPEN SPACES	
POLICY 5.1	
Engage communities in the design, programming and improvement of their local open spaces, and in the	
development of recreational programs.	
, , ,	
POLICY 5.2	
Increase awareness of the City's open space system.	
POLICY 5.3	
Facilitate and encourage the development of community-	
initiated or supported open spaces.	
POLICY 5.4	
Reduce governmental barriers to community-initiated	
recreation and open space efforts.	

Draft 2013 ROSE Objectives or Policies	Related 1986 ROSE Objectives or Policies
OBJECTIVE 6	
SECURE LONG-TERM RESOURCES AND	
MANAGEMENT FOR OPEN SPACE ACQUISITION,	
OPERATIONS AND MAINTENANCE	
POLICY 6.1	
Pursue and develop innovative long-term funding	
mechanisms for maintenance, operation, renovation and	
acquisition of open space and recreation.	

The public and decision-makers will consider the draft 2013 ROSE Update, policies and objectives in the above context.

Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,² the 2012 Parks Bond,³ the Significant Natural Resource Areas Management Plan (SNRAMP), and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

Approach to Analysis

The subject of this Initial Study is an analysis of new policies and objectives comprising an update (amendment) to the ROSE of San Francisco's General Plan. This Initial Study approaches the analysis of the proposed ROSE policies, goals and objectives in a comprehensive, programmatic manner, and focuses the analysis on a series of potential actions (e.g., adoption of high-level policy) that may be characterized as one large project with elements related to each other either geographically or in the context of future legislation (such as the issuance of rules, regulations or plans).

Based on the definition of a "project" under CEQA (Section 15378 of the CEQA *Guidelines*) and case law interpreting CEQA, environmental review of an amendment to a General Plan or General Plan element need only analyze changes from a previously adopted plan or element. Thus, this Initial Study addresses the changes of the draft ROSE Update from the previous 1986 ROSE, as presented in Table 1. No specific development projects are analyzed in this Initial Study.

B. ENVIRONMENTAL SETTING

The ROSE applies to recreational and open spaces under the jurisdiction of the San Francisco Recreation and Park Department (RPD), including Sharp Park in the City of Pacifica in San Mateo County and Camp Mather located in Groveland in Tuolumne County.

² SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

³ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Location

San Francisco is a consolidated city and county. As illustrated in Figure 1 below, the City is located on the tip of the San Francisco Peninsula with the Golden Gate Strait to the north, San Francisco Bay to the east, San Mateo County to the south, and the Pacific Ocean to the west. The City is one of nine counties adjacent to the San Francisco and San Pablo Bays. Daly City and the City of Brisbane abut San Francisco to the south. The City comprises a land area of approximately 49 square miles.

Sharp Park is a public park is located in the City of Pacifica in San Mateo County that is owned and operated by the RPD. It is bisected from north to south by the Pacific Coast Highway (PCH), with the project site located west of PCH. Sharp Park is bounded by the Pacific Ocean to the west. To the north and south, portions of Sharp Park are bordered by residential development. Sharp Park abuts portions of the Golden Gate National Recreation Area (GGNRA) to the south and east. Sharp Park contains an 18-hole golf course, an archery range, a clubhouse, a remediated former rifle range, a parking lot, and extensive natural areas including an approximately 27-acre wetland complex consisting of Horse Stable Pond (HSP), Laguna Salada (LS), a channel and culverts that connect HSP to LS, and adjacent wetlands.

Camp Mather is located in Groveland in Tuolumne County and approximately 150 miles east of San Francisco near the Hetch Hetchy Valley, offering family camp activities with campfire entertainment, sport activities, supervised recreation programs for children, and fine dining.⁴

Regional Facilities

Regional recreational facilities are provided by the East Bay Regional Park District in Alameda and Contra Costa counties; the National Park System in Marin, San Francisco, and San Mateo counties; and several State Park recreation facilities located throughout the Bay Area. In addition, thousands of acres of watershed and agricultural lands are preserved as open spaces by water and utility districts or are in private ownership. The Bay Trail is a recreational corridor that, when complete, would encircle San Francisco and San Pablo Bays with a continuous 500-mile network of bicycling and hiking trails. It would connect the shoreline of all nine Bay Area counties, link 47 cities, and cross the major toll bridges in the region. To date, approximately 310 miles of the Bay Trail alignment, about 60 percent of its ultimate length has been completed.

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⁴ SFRPD. Camp Mather. Available online at: http://sfrecpark.org/destination/camp-mather/. Accessed February 10, 2014.



Project Location

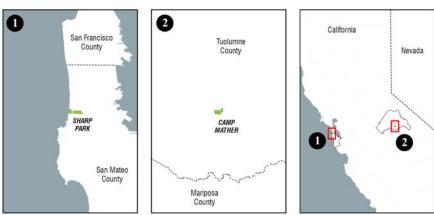


Figure 1: Project Location

City and County Facilities

Property in San Francisco that is permanently dedicated to publicly-accessible park and recreational uses totals roughly 5,890 acres. The provisional population estimate for San Francisco as of April, 2010, was 805,235, which equates to a ratio of roughly 7.3 acres of open space per 1,000 residents.⁵

A majority of local-serving parks and recreation facilities within San Francisco are owned and operated by the RPD. The RPD maintains 220 parks, playgrounds, and open spaces throughout the City, which function mainly for neighborhood use. The park system also includes 25 multiuse recreation centers, nine swimming pools and five golf courses, as well as hundreds of tennis courts, baseball diamonds, athletic fields and basketball courts. The RPD also manages the Marina Yacht Harbor, Candlestick Park, the San Francisco Zoo, and the Lake Merced Community Complex.⁶ The RPD currently owns and manages a total of approximately 3,400 acres of parkland and open space in San Francisco.⁷ In conjunction with community organizations, the City also maintains about 1,000 acres of natural land. The State owns approximately 255 acres at Candlestick Point State Recreation Area and Mount Sutro and the federal government owns approximately 1,600 acres primarily at the Presidio, Ocean Beach, Fort Funston, Lands End, Sutro Heights and China Beach, which are managed by the National Park Service (NPS) as part of the GGNRA. Figure 1 illustrates parks and open spaces within the City. This figure includes the City's community gardens, land owned by RPD and other open space areas (such as the Presidio, which is comprised of NPS land).

Several larger open space areas, including Golden Gate Park (approximately 1,000 acres), the Lake Merced complex (approximately 600 acres; 245-acre lake) and John McLaren Park (approximately 300 acres) comprise about one-half of the total City-owned acreage in recreational/open space use. These larger areas provide programs, activities or recreational opportunities that serve the City as a whole. These spaces, in addition to smaller areas with unique attributes such as water features or hilltop vista points, function as city-serving open spaces because they attract residents from the entire City.

Types of Uses and Activities

RPD's facilities offer a wide array of uses and activities to the public. Some facilities and activities are provided by third party entities through long-term RPD leases. These include clubhouses for nursery and daycare services, Golden Gate Park Bike Rentals, the Japanese Tea Garden Restaurant, the Zoo, golf courses, the Beach Chalet, Coit Tower, and museums. Other uses, organized activities and attractions are permitted through the RPD's Permits and Reservations Division. According to the most current data, the RPD permits between 50-60,000 activities

⁵ State of California, Department of Finance, Census 2010, from *www.dof.ca.gov*, accessed March 9, 2011.

⁶ In cases where a park or open space is subject to the Public Trust Doctrine (generally within the coastal zone), these spaces are managed by the Port of San Francisco. San Francisco Recreation and Parks Department and the Port of San Francisco, www.sfreckpark.org and www.sfport.com, accessed September 6, 2011.

⁷ San Francisco Neighborhoods Park Council, "Green Envy: Achieving Equity in Open Space." Available online at: http://sfnpc.org/greenenvy/, Table 5, pg. 1, accessed March 9, 2011.

annually. As shown in Table 2, below, the RPD issued 54,698 permits for the 2010-2011 fiscal year.⁸

The types of permitted activities on park properties range from small scale events (e.g., birthday parties and picnics), weddings, athletic rentals for kickball, softball, soccer, to larger scale events like the Outside Lands music festival and marathons (e.g., Bay to Breakers). Some permits are for ongoing activities, like those for Off the Grid that permit mobile food cart operation. The majority of permits are provided for athletic events: 76 percent are for baseball, soccer and other field use; picnics and recreation rooms rentals make up about 16 percent of permitted activities; 3 percent of the permits are for indoor events at gymnasiums; special events account for another 3 percent, and weddings and film permits total less than one percent of all permits RPD issues.

Table 2: RPD Permits (2010-2011)

Event/Permit	Number Issued
Film	241
Wedding sites	357
Gymnasia	1,400
Special Events	2,000
Recreation Center Rooms	3,137
Other Athletics	3,606
Picnics	5,643
Baseball Diamonds	9,967
Soccer Fields	28,617
TOTAL	54,698

The size of permitted events varies from 10 to more than 150,000 persons. On average, picnics accommodate about 15 people; the San Francisco Cross Country Running Race accommodates about 200 people at the Golden Gate Park Polo Field; the SF Jazz Summersets in Union Square permits 500 people; the Twitter Employee Picnic in Golden Gate Park's Speedway Meadow hosts about 1,200 employees; Family Day Kite Festival at Marina Green has attendance levels of about 5,000 persons; the Nike Women's Marathon draws about 25,000 participants to Golden Gate Park, while the Hardly Strictly Bluegrass festival have visitor levels of about 150,000 persons.

Permits are tailored to the specific event, each with a different set of obligations and requirements. Where relevant, permits regulate the type and location of structures; require a transportation plan for events with more than 10,000 attendees; require Americans with Disabilities Act (ADA) compliance and possibly safety monitors; as well as include set up and clean-up provisions, restrictions on smoking, and liability for damages.

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⁸ Email communication with Lisa Beyer, Recreation and Parks Department, July 28, 2011. This information is available for review in Case File 2010.0641E at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	Applicable	Not Applicable
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.		\boxtimes
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.		\boxtimes
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building		

Planning Code and Zoning

The San Francisco Planning Code ("Code"), which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and the configuration of buildings within San Francisco. Implementation of the draft ROSE Update would require General Plan text amendments, though no variances, special authorizations, or changes to the Zoning Maps would be necessary. The following Code Sections relate to open space and recreation:

Section 135 (et. seq.) – Usable Open Space for Dwelling Units and Group Housing in Residential, Neighborhood Commercial, Mixed Use, Commercial and Industrial Districts. Generally, the Code requires that usable open space be provided for each dwelling unit and each group housing structure in Residential (R), Neighborhood Commercial (NC), Commercial (C), Mixed Use (MU), and Industrial (M, or more recently "Production, Distribution and Repair" - or PDR) Districts. The Code requires that usable open space be comprised of an outdoor area or areas designed for outdoor living, recreation or landscaping, including such areas on the ground as well as on decks, balconies, porches and roofs, which are safe and suitably surfaced and screened on the same lot as the dwelling units (or bedrooms in group housing) they serve in either private or commonly accessible spaces. The amount of required open space is dependent on the use district in which a specific property is located and whether the space provided is private or commonly accessible. The Code requires between 300 square feet of private open space per dwelling unit in the City's lowest density residential districts and 36 square feet in its highest, with differing amounts linked to the specific use district. The Code also allows for the substitution of private for common open space at a ratio of 1.33 (except in Chinatown districts where it is 1.00). The Code also requires that streetscape improvements that are provided to meet publicly-accessible open space requirements must also conform to Better Streets Plan guidelines and other applicable neighborhood streetscape plans as discussed in Section 138.1 (see below).

Draft ROSE Policy 2.11 states "Assure that privately developed residential open spaces are usable, beautiful and environmentally sustainable," and is similar to Policies 4.5 and 4.6 in the existing ROSE calling for adequate amounts of open space to be developed as part of residential projects. Any amendment to the Code would be subject to specific study and review. The policies in the draft ROSE Update would not amend the specific ratios of usable open space required by this section, and would therefore not conflict with Planning Code Section 135.

Section 138 – Open Space Requirements in C-3 Districts. This Code provision requires applicants constructing new buildings or an addition of gross floor area equal to 20 percent or more of an existing building in C-3 (e.g., Downtown Commercial) districts to provide open space

in relation to the gross square feet of the overall project. Generally, depending on the type of use district within the C-3, the Code requires 1 square foot of open space for every 50 gross square feet of a particular use. In C-3-R (Downtown Commercial, Retail) districts, the Code requires a ratio of 1 square foot of open space for every 100 gross square feet of retail use. Open spaces may be on, or within 900 feet of the subject property, though they must be entirely within a C-3 use district. Subsection 138(d) also sets forth other standards with respect to the types and location of open space. Draft ROSE Update Policy 2.11 ("Assure that privately developed residential open spaces are usable, beautiful and environmentally sustainable.") and Policy 2.12 ("Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated.") would not conflict with this Code Section because these policies relate to existing ROSE Policies 4.5 and 4.6 that call for requiring usable open space as part of new residential development and that the amount of space be adequate to serve that development. Furthermore, no amendments to the Code controls related to the amount of open space required as part of private residential development are proposed as part of the draft ROSE Update.

Section 138.1 – Streetscape and Pedestrian Improvements. Adopted in May 2010, Section 138.1 codifies requirements for the improvement of public rights-of-ways associated with development projects, such that public right-of-ways may be "safe, accessible, convenient and attractive to pedestrian use and travel by all modes of travel consistent with the San Francisco General Plan, achieve best practices in ecological stormwater management, and provide space for public life, social interaction, in accordance with the City's Better Streets Policy." This section requires that pedestrian and streetscape elements included as part of development projects follow the principles and guidelines for street typologies outlined in the Better Streets Plan. These requirements apply to street trees (setting forth the size and type of trees required) and other streetscape and pedestrian elements for large projects (e.g., those that involve new construction on lots greater than 0.5-acre, have more than 250 feet of lot frontage, or have a lot frontage on an entire block face, as well as in some cases projects that entail substantial additions or alterations). In such a case, the Code requires the Planning Department to consider standard streetscape elements to be included in the public realm or sidewalk widening per the Better Streets Plan. The draft ROSE Update contains policies and objectives that relate to the intent of the Better Streets Plan implementing Planning Code controls (e.g., Policy 2.8, Objective 3, Policy 3.1 and Policy 3.3) and would not conflict with the Code Section 138.1.

Planning Code Section 412 – Downtown Park Special Fund. Existing public park facilities located in the downtown office districts are at or approaching capacity utilization by the daytime population in those districts. The need for additional public park and recreation facilities in the downtown districts will increase as the daytime population increases as a result of continued office development in those areas. While the open space requirements imposed on individual office and retail developments address the need for plazas and other local outdoor sitting areas to serve employees and visitors in the districts, such open space cannot provide the same recreational opportunities as a public park. In order to provide the City with the financial resources to acquire and develop public park and recreation facilities which will be necessary to serve the burgeoning daytime population in these districts, Section 412 et seq establishes a

Downtown Park Fund to address these needs. Generally, project applicants are assessed a fee of \$2 per square foot of the net addition of gross floor area of office use to be constructed as set forth in the final approved building or site permit. The policies proposed as part of the draft ROSE Update would neither amend these existing requirements, nor otherwise conflict with this Code Section.

Section 234 – Public Use (P) Districts. Parks and open spaces are generally within Public (P) Use Districts. The purpose of designating such land as a P District on the Zoning Map is to relate the Zoning Map to actual land use and to the General Plan with respect to such land. Public structures and uses of the City that are consistent with the General Plan are principally permitted uses in a P District. Implementation of the draft ROSE Update would not change or conflict with any existing use district, including P Districts.

Section 290 – Open Space (OS) Height and Bulk Districts. In the Open Space Districts designated by the symbol "OS" on Sectional Map Nos. 1H through 13H of the Zoning Map, the height and bulk of buildings and structures are determined in accordance with the objectives, principles and policies of the General Plan, and no building or structure or addition thereto may be permitted unless in conformity with the General Plan. The inclusion of land in OS Districts is intended to indicate its principal or exclusive purpose as open space, with future development of any character strictly limited. Implementation of the draft ROSE Update would not alter or conflict with any existing Height and Bulk District.

Plans and Policies: Adopted Area Plans

Balboa Park Station Area Plan

In 2008, the City adopted the Balboa Park Station Area Plan with the goal of restoring, revitalizing, and enhancing an approximately 210-acre area located in south central San Francisco surrounding the Balboa Park Bay Area Rapid Transit (BART) and Muni station. The Area Plan is guided by three primary principles, including: improving the public realm, making the transit experience safer and more enjoyable, and improving the economic vitality of the Ocean Avenue Neighborhood Commercial District. The Area Plan contains policies pertaining to land use, transportation, parking, housing, streets and open space, built form, historic preservation, and public art.

With respect to parks and recreational resources, Balboa Park, at approximately 24 acres, is the largest park in the area and includes a public swimming pool, a children's playground, a stadium, baseball diamonds, tennis courts and the Ingleside police station. Area Plan Policy 5.12 states, "Safe and active open spaces should be designed, including a re-design of Balboa Park," which generally relates to Policy 1.1 and 1.2 in the draft ROSE Update that call for "Encourage the dynamic and flexible use of existing open spaces and promote a variety of open space uses, where appropriate" and "Prioritize renovation in highly-utilized open spaces and in high needs areas," respectively. The Area Plan also envisions the creation of a system of neighborhood open spaces, including active, passive and informal gathering areas, such as publicly accessible neighborhood and transit-oriented parks, plazas and a children's playground. The draft ROSE Update policies would not conflict with those in the Balboa Park Station Area Plan.

Bayview/Hunters Point (formerly South Bayshore)

The Bayview/Hunters Point neighborhood covered by the 700-acre Bayview/Hunters Point Area Plan, is located in the southeastern portion of San Francisco, surrounded by the neighborhoods of Candlestick and Executive Park to the south, Visitacion Valley, Portola, and Bernal Heights to the west, the Central Waterfront and Showplace Square/Potrero Hill to the north, and San Francisco Bay to the east. The Area Plan's principle objectives are to achieve a favorable balance among residential, industrial, commercial and open space uses; to stimulate development in underused and declining areas; to enhance its low scale physical character; and to increase pedestrian-oriented neighborhood commercial and social activities.

The Area Plan area includes 15 parks and recreational spaces, the largest of which is the approximately 170-acre Candlestick Point State Recreation Area. The Area Plan's policies call for, among others, making better use of existing facilities; making joint use of existing recreation and educational facilities; and providing a continuous open space along the southeastern shoreline. These policies are generally consistent with existing ROSE Policy 1.1 ("Protect the natural character of regional open spaces and place a high priority on open spaces noted for unique, natural qualities.") and those proposed by the ROSE Update, particularly Policy 2.5, which "Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, and Candlestick and Hunter's Point Shipyard." The draft ROSE Update's objectives and policies would not conflict with those in the Bayview/Hunters Point Area Plan.

Central Waterfront

The Central Waterfront Plan area is bounded by Mariposa Street on the north, San Francisco Bay on the east, Islais Creek on the south, and I-280 on the west. The Central Waterfront is characterized primarily by PDR businesses in the area's many one- and two-story structures. Housing is concentrated around the Dogpatch neighborhood, between 20th and 22nd Streets and Indiana and 3rd Streets. Neighborhood-serving business and services are located on 22nd Street, which acts as Dogpatch's commercial heart. The approximately 1.8-acre Esprit Park is the neighborhood's primary open space. Objective 5 in the Central Waterfront Plan concerns itself with streets and open space, and includes policies that are intended to: promote parks and open spaces that meet the needs of area residents, workers and visitors; create green streets that connect open spaces and improve walkability and neighborhood aesthetics; create high quality open space in private developments; and maintenance of existing open space, recreation and park facilities. As discussed on draft ROSE Update under Policy 2.4, the Port of San Francisco (Port) is planning a number of open spaces and improvements to the central and southern waterfronts that will help address open space and recreational needs that will be connected by "the Blue Greenway," a recreational greenway which will extend from Mission Creek to the City's southern border, completing San Francisco's portion of the Bay Trail. Projects in the Southeastern Waterfront include, but are not limited to, Mission Bay waterfront open spaces, the Port's Blue Greenway projects and the India Basin (SFRA Area C), Hunters Point Shipyard and Candlestick projects and connections to San Mateo County.

The proposed Blue Greenway responds to Policy 2.4 of the draft ROSE Update calling to "support the development of signature public open spaces along the shoreline," which would generally advance and not conflict with the open space policies in the Central Waterfront Plan.

Chinatown

The area covered by the Chinatown Area Plan includes 30 blocks in whole or in part on the eastern slopes of Nob Hill as well as portions of Russian Hill. The Financial District lies to the east of Chinatown and to the south is Union Square. Grant Avenue, Stockton Street and the hillside blocks that intersect them comprise the core of Chinatown. Portsmouth Square, Chinese Playground and the Chinese Recreation Center are the primary neighborhood open spaces and recreational facilities.

In 1998, A Chinatown Alleyway Master Plan was commissioned by the Department of Public Works and authored by the non-profit Chinatown Community Development Center, to provide guidelines for the renovation of 31 alleys in Chinatown. The alleyway renovation projects were designed to reduce illegal parking and vehicle access, in order to improve pedestrian safety, mandate access improvements for the disabled and elderly, reduce illegal dumping through the consolidation of dumpster areas, create open space through the installation of landscape features and seating where appropriate, provide attractive and safe secondary streets for tourists and visitors, and improve the overall quality of life for Chinatown residents. Implementation of the Chinatown Alleyway Master Plan has been completed including five phases of alleyway renovation projects. The alleys renovated include Jack Kerouac, Waverly Place (two alleys), John, Commercial, Ross, Cordelia and Hang Ah, Beckett, Wentworth and Cooper alleyways.9

The Chinatown Area Plan includes Policy 4, which calls for "Expand[ing] open space opportunities," which is consistent with Objective 2 of the draft ROSE Update that calls for "Increas[ing] open space to meet the long-term needs of the City and Bay Region," and would be generally consistent with proposed ROSE Policy 2.1, which calls for prioritizing "the acquisition of open space in high needs areas," which corresponds to existing ROSE Policy 4.4 to "Acquire and develop new public open space in existing residential neighborhoods, giving priority access to areas which are most deficient in open space." The draft ROSE Update policies would not conflict with the objectives and policies in the Chinatown Plan.

Civic Center

The geographic area covered by the Civic Center Area Plan generally includes the area between Franklin, McAllister, Market, and Hayes Streets. The area is encompassed by multiple neighborhoods, including Downtown and the Western Addition. The Area Plan's objectives entail maintaining and reinforcing the symbolic and ceremonial focus of government culture, as well as developing the area as a cohesive center for government, cultural, ceremonial and community activities. Civic Center Plaza is the primary open space in the district, which also serves the nearby Uptown Tenderloin and Mid-Market areas. Policy 3 of the Civic Center Plaza Area Plan calls for designing buildings and open spaces to serve as public gathering places for ceremonial, cultural and recreational activities, while Policy 4 calls for providing a sense of

⁹ San Francisco Department of Public Works, streetscape projects, *www.sfdpw.org*, accessed August 17, 2011.

identity and cohesiveness through unifying street and plaza design treatments. Draft ROSE Update Policy 2.6 calls for "Support[ing] the development of civic-serving open spaces," which, as envisioned in the ROSE Update, would entail "a series of connected open spaces, along a Civic Center axis from Market Street to City Hall could be created with the development of pedestrian mall along Fulton Street between the new Main Library and Asian Art Museum, and with corresponding activity improvements to increase the usability of the Civic Center and UN Plazas." ¹⁰ The draft ROSE Update policies would not conflict with the Civic Center Area Plan.

Downtown Plan

The geographic area covered by the Downtown Plan is roughly bounded to the west by Franklin Street, to the east by the Embarcadero, to the north by Washington Street or Bush Street, and to the south by Folsom Street. The Downtown Plan grows out of an awareness of the often conflicting civic objectives between fostering a vital economy and retaining the urban patterns and structures which collectively form the physical essence of San Francisco. The Plan envisions downtown as a center of ideas, services and trade and as a place for stimulating experiences. Key parks and open spaces in the downtown include Justin Herman Plaza, the public access pier at Pier 7, Sue Bierman Park, Redwood Park, Yerba Buena Gardens, Union Square, St. Mary's Square, Boeddeker Park, MacCaulay Park, and the Tenderloin Playground.

Notable Downtown Plan policy objectives related to open space in the dense commercial office core entail Policy 9.1 ("Require usable indoor and outdoor open space, accessible to the public, as part of new downtown development."), Policy 9.2 ("Provide different kinds of open space downtown."), Policy 9.3 ("Give priority to development of two categories of highly valued open space; sunlight plazas and parks.") and Policy 11.1 ("Place and arrange open space to complement and structure the urban form by creating distinct openings in the otherwise dominant streetwall form of downtown."). These policies and supporting provisions of the Planning Code (primarily Sections 138: Open Space Requirements in C-3 Districts, and 138.1: Pedestrian Streetscape Requirements in C-3 Districts) have guided the development of 31 privately-owned public open spaces (POPOS) since adoption of the Downtown Plan in 1985.¹¹ The ROSE Update contains related Policy 2.12 "Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated."

The policies in the draft ROSE Update would not conflict with the existing Downtown Plan policies or Planning Code sections that pertain to open space.

East South of Market Area Plan (East SoMa)

The East SoMa Area Plan covers an irregularly-shaped geographic area which generally extends to 7th and 4th Streets on its west, Mission and Folsom Streets on its north, Harrison and Townsend Streets on its south and the Embarcadero on its east. Community-driven goals for the

¹⁰ Draft ROSE Update, p. 26.

¹¹ The Planning Departments 2012 Downtown Monitoring Report indicates 81 POPOs in the Downtown Area, 31 of which were provided prior to the 1985 Downtown Plan. Available online at: http://www.sf-planning.org/ftp/files/Citywide/Downtown_Annual_Report_2012.pdf. Accessed February 13, 2014.

East SoMa Plan Area include: encouraging an appropriate mix of land uses; retaining and promoting businesses and organizations that contribute to the diversity of the neighborhood; encouraging more neighborhood-serving businesses; attracting jobs for local residents; encouraging a mix of incomes in renter and owner-occupied housing and increasing affordable housing opportunities; offering a variety of transportation options; improving the character of streets and encouraging pedestrian safety; and improving community facilities and enhancing open space. Parks and recreational facilities in the neighborhood include South Park, Victoria Manolo Draves Park and the South of Market Recreation Center.

The Area Plan's Streets and Open Space chapter addresses major open space objectives, including: meeting resident and worker needs; developing high-quality private open spaces; creating a network of green streets; beautifying the neighborhood and strengthening the environment; and ensuring adequate maintenance. Within that framework, the East SoMa Area Plan includes, for example, Policy 5.1.1 to: Identify opportunities to create new public parks and open spaces and provide at least one new public park or open space serving the East SoMa; Policy 5.3.1: Redesign underutilized portions of streets as public open spaces, including widened sidewalks or medians, curb bulb-outs, "living streets" or green connector streets; Policy 5.3.4: Design the intersections of major streets to reflect their prominence as public spaces; and Policy 5.4.1: Increase environmental sustainability of East SoMa's system of public and private open spaces by improving the ecological function of all open space. These policies generally embrace the primary objectives in the ROSE Update, including Policy 2.1: Prioritizing acquisition of open space in high needs areas; Objective 3: Improve access and connectivity to open space; and Objective 4: Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces. The Area Plan identifies areas between Howard and Folsom, 4th and 5th Streets, as the area near Bryant and 4th Streets as areas in which to acquire and develop sites for open space or neighborhood parks. The East SoMa Area Plan also identifies Minna, Natoma and Russ Streets as alleys where "living street" treatments12 may be applied, as well as on Folsom Street, Townsend Street, 2nd Street and 7th Street. The policies of the draft ROSE Update would not conflict with those in the East SoMa Plan.

Hunters Point Shipyard Area Plan

Hunters Point Shipyard is located in the southeast quadrant of San Francisco, approximately 1.3 miles northeast of the City's southern boundary and approximately six miles south of Downtown. The shipyard is comprised of a largely flat 493-acre landfill peninsula. It is surrounded on three sides by water and is bordered on its land side by Hunters Point Hill. Park and Recreation facilities within the area include the 11.5-acrea Indian Basin Park and Milton Myer Recreation Center. Objective 7 in the area plan states: "Create a world class system of open space that includes a significant portion of the overall Hunters Point shipyard, enables improvements to the shoreline that enhances access, provides a wide range of recreational and ecological restoration opportunities, and is seamlessly integrated with the existing neighborhood." This objective relates to the draft ROSE Update Policy 4.3 which calls for integration of "the protection and restoration of local biodiversity into all open space

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¹² Living streets or alleyways where traffic is calmed and paving and landscaping are designed to reflect the pedestrian primacy of these streets.

construction, renovation, management and maintenance using environmentally sustainable design principles" <u>and Policy 4.4 which calls for inclusion of "environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities,"</u> and would not conflict with thisese policyies. The policies and objectives in the draft ROSE Update would not conflict with the Hunters Point Shipyard Area Plan.

Market and Octavia

The geography of the Market and Octavia Area Plan includes the area bounded roughly by 9th Street to the east, 16th Street to the south, Sanchez Street to the west, and Turk Street to the north. The removal of the Central Freeway and construction of Octavia Boulevard provided local opportunities to reconnect the community and to transform the area into a more vibrant, urban place. The Market and Octavia Area Plan encourages new mixed-use development, including a substantial amount of new housing intended to strengthen and enhance the area's character. Area parks and recreational facilities include Jefferson Square and Hayward Playground, Koshland Park, Duboce Park and Patricia's Green.

Compared with the City's other adopted area plans, the thrust of the Market and Octavia Area Plan's open space policies are geared toward better and more comprehensive use of existing public streets and rights-of-ways as assets to the neighborhood's open space network. Objective 4.1 calls for providing "safe and comfortable public rights-of-way for pedestrian use and improve[ing] the public life of the neighborhood." Individual policies call for enhanced landscaping, prioritizing intersection improvements, creating new open spaces around the freeway touchdown, and enhancing the transit hub around the Market and Church Streets, among other things.

The Area Plan calls for living street improvements on the following streets, alleyways and public rights-of-way: Birch, Ivy, Linden, Hickory, Lily, Rose, Laussat, Carmelita, Potomac, Herman, Walter, Henry, Belcher, Reservoir, Landers, Sharon, Alert, Hildago Terrace, Rosemont, Ramona, Pink, Pearl, Clinton Park, Brosnan, Stevenson, Jessie, McCoppin, Gough, Brady, Colusa, Minna, Lafayette and Plum. The Area Plan prioritizes open space and streetscape improvements as funding becomes available over time. The Area Plan also envisions a new, roughly 13,000-square-foot neighborhood park ("Brady Park") on a block bounded by Market, Gough, Otis and 12th Streets, consistent with the draft ROSE Update's identification of this part of the neighborhood as a "focus area" for City renovation and acquisition of open space. The policies in the draft ROSE Update would not conflict with the Market and Octavia Area Plan.

Mission

The Mission plan area is bounded by Guerrero Street to the west, Potrero Avenue to the east, Division Street to the north and Cesar Chavez Street to the south. Parks and recreational spaces in the Mission include Franklin Square, KidPower Park, Mission Playground, Alioto Mini Park, Jose Coronado Playground, Mission Center, Parque Niños Unidos, Juri Commons, the 24th & York Mini Park and Garfield Square. Based on analysis conducted for the Mission Area Plan, the Mission has a total existing deficiency in neighborhood-serving open spaces of upwards of 4.3

¹³ Draft ROSE Update, High Needs Areas, p. 21.

acres that should be provided to accommodate forecasted growth. Similar to the East SoMa Area Plan, the Mission Area Plan also includes a policy (5.1.1) that calls for identifying "opportunities to create public parks and open spaces and provide at least one new public park or open space serving the Mission." The Area Plan calls out the northwest Mission (generally between Division Street, South Van Ness Avenue, 18th Street and Guerrero Street) and 21st to 23rd and Harrison to Florida Streets as areas in which to acquire and develop sites for open space or neighborhood parks.

In keeping with Mission Area Plan Policy 5.1.1, the RPD recently acquired a parcel from the San Francisco Public Utilities Commission (SFPUC) on the north side of 17th Street between Folsom and Shotwell Streets for the construction of a 34,300-square-foot neighborhood park. The Planning Department issued a Community Plan Exemption and Mitigated Negative Declaration for the property acquisition and park development, which found that this project would be "expected to provide a foundation of stability in the form of open space use that could serve as an enhancement to the existing communities."¹⁴

Other policies in the Area Plan call for the creating a system of "green connector streets" in the neighborhood (e.g., 16th, 20th and 25th Streets and South Van Ness Avenue)¹⁵ as well as ensuring recreation and park facilities are well maintained. See also discussion of the Mission Streetscape Plan and the Better Streets Plan, p. 28 of this document, respectively, for more information. Taken together, the policies in the draft ROSE Update would not conflict with the Mission Area Plan.

Northeastern Waterfront

The Northeastern Waterfront Area Plan encompasses the city's waterfront and inland blocks from the Municipal Pier at the end of Van Ness Avenue to South Beach Harbor/McCovey Cove near AT&T Park. The Area Plan contains objectives and policies designed to contribute to the waterfront's environmental quality, to enhance the economic vitality of the Port and the City, to preserve the unique maritime character, and to provide for the maximum feasible visual and physical access to and along the Bay.

The Area Plan's primary recreation and open space objective is to "strengthen and expand the recreation character of the northern waterfront and to develop a system of public open spaces and recreation facilities that recognizes its recreational potential, provides utility and identity to the urban area, and establishes an overall waterfront character of openness of views, water and sky and public accessibility to the water's edge." Open spaces within the plan area include McCovey Cove, Willie Mays Plaza and South Beach Harbor Park; Brannan Street Wharf (planned); Rincon Park, Justin Herman and the Ferry Building Plazas; Pier 7; Sydney G. Walton Square; Levi's Plaza; and the Maritime National Historical/Aquatic Park. Additionally, the

¹⁴ Folsom Street Park Community Plan Exemption and Mitigated Negative Declaration, Case File No. 2009.1163E. The file is available for review at the Planning Department,1650 Mission Street, Suite 400.

¹⁵ The Mission Area Plan, p. 69, defines "green connector streets" as streets with "wider sidewalks, places to sit and enjoy, significant landscaping and gracious street trees that would provide linkages to between larger open spaces and diffuse the recreational and aesthetic benefits of these spaces into the neighborhood." The Area Plan is available for review on the Planning Department's website at http://www.sfplanning.org or in Case File No. 2004.0160E at the Planning Department,1650 Mission Street, Suite 400.

portion of the Embarcadero within the plan area also serves as the San Francisco Bay Trail, a recreational corridor that, when complete, would encircle San Francisco and San Pablo Bays with a continuous 500-mile network of bicycling and hiking trails. The Bay Trail would connect the shoreline of all nine Bay Area counties, link 47 cities, and cross the major toll bridges in the region. The draft ROSE Update policies, particularly Policy 2.4, calling for "support[ing] the development of signature public open spaces along the shoreline" correspond to the overarching objectives of the Waterfront Area Plan and would not, in and of themselves, result in obvious conflicts that would result in adverse environmental effects.

Rincon Hill

Rincon Hill is south of the Financial District and Transbay Terminal area, and north of the South Beach neighborhood. It is bounded generally by Folsom Street, the Embarcadero, Bryant Street, Beale Street, the Bay Bridge approach and Essex Street. The Rincon Hill Plan aims to transform the area into a mixed-use downtown neighborhood with substantial amounts of housing, while providing the full range of services and amenities that support urban living. In 2012, Emerald Park located on Harrison and Fremont streets was opened. It was built by the developer of the 333 Harrison development project and is available to the public through an irrevocable conservation easement, with the Parks Alliance as steward. As of 2013, parks and recreational facilities are limited in Rincon Hill, with a number of spaces located outside the district (e.g., Rincon Point Park and a recently-completed dog run on the north side of Bryant Street) or in the planning phases (e.g., a proposed neighborhood park near First and Harrison Streets). Additionally, a mini-park on Guy Place Street, was called for in the Rincon Hill Streetscape Plan, and is now funded and is starting planning, and design phases. The Area Plan's objective also calls for improvements to streets, and creation of linear parks (Living Alleys), which are generally consistent with the objectives and policies in the draft ROSE Update and also the Better Streets Plan. The draft ROSE Update would not conflict with the open space objectives in the Rincon Hill Plan.

Showplace Square/Potrero Hill

The geographic area of the Showplace Square/Potrero Hill Area Plan includes the area roughly bounded to the east by Interstate 280, to the south by 26th Street, to the west by Potrero Avenue, and to the north by Bryant Street. Parks and recreation spaces include Jackson Playground, McKinley Square, Potrero Playground, Potrero del Sol Park and the Potrero Hill Recreation Center. Showplace Square's history as an almost exclusively industrial area has meant that this area has comparatively little access to open space as compared with the rest of the city. An analysis prepared for the Eastern Neighborhood planning process¹⁶ found that a total of about 4.0 acres of new open space should be provided in this area to accommodate expected growth. Thus, the area plan proposes providing at least one new open space in the area (e.g., possibly at the 16th and Irwin public plaza as well as open space proposed on the Daggett Street right-of-way approved as part of the 1000 16th Street mixed-use development),¹⁷ in addition to widened

¹⁶ San Francisco's Eastern Neighborhoods Needs Assessment, Seifel Consulting, Inc. This document was prepared as a background report for the Eastern Neighborhoods Rezoning and Area Plans Project and is available for review in Case File No. 2004.0160E at the Planning Department, 1650 Mission Street, Suite 400.

¹⁷ For more information see 1000 16th Street Final Environmental Impact Report (FEIR) in Planning Department Case File No. 2003.0527E. The FEIR is available for review on line at www.sfplanning.org.

sidewalks with pocket parks and green streets. The Showplace Square/Potrero Hill Area Plan's open space and recreation policies are generally consistent with the ROSE Update policies that call for "prioritize acquisition of open space in high needs areas" (Policy 2.1) and "Assure that privately developed residential open spaces are usable, beautiful, and environmentally sustainable" (Policy 2.11).

Van Ness Avenue

Van Ness Avenue is situated in the valley between Nob and Russian Hills and Pacific Heights. The Van Ness Avenue plan area is encompassed by multiple neighborhoods (including the Downtown, Western Addition, Marina, and Northeast neighborhoods) and entails the full length of Van Ness Avenue and the entirety of one block to its east and west generally from Redwood Street along its south to Bay Street on its north. Its primary focus is to promote the continuation of existing commercial uses and the addition of substantial new housing with densities compatible with the existing character that reinforces topography and urban pattern. There is one park and recreational/cultural facility, the San Francisco National Maritime Historical Park, within (and also just outside of) the Van Ness Avenue Area Plan along its northern-most boundary. The park includes a fleet of historic vessels, a visitor center, a maritime museum, a library/research facility and a 1,850-foot municipal pier that provides public access to San Francisco Bay. The Van Ness Avenue Plan Policy 2 calls for "supporting the National Park Service plans for improvements of the area within the boundaries of the Golden Gate National Recreation Area (GGNRA)." This policy is in line with Policy 3.2 in the existing ROSE ("Maintain and improve the quality of existing shoreline open space.") and the corresponding Policy 1.4 in the draft ROSE Update, "Maintain and repair open spaces to modern maintenance standards." The draft ROSE Update's objectives and policies would not conflict with the Van Ness Avenue Area Plan.

Western Shoreline

The geographic area covered by the Western Shoreline Area Plan includes portions of the Great Highway, Golden Gate Park, the Zoo, Lake Merced, Ocean Beach, Sutro Heights Park, the Cliff House, Sutro Baths, Fort Funston, Olympic Country Club, and the Richmond and Sunset Residential neighborhoods. From the early years of the City's history, the coastal beach and cliff areas have been an important recreational and natural resource to City residents and to the Bay Area at large. Open space and recreational resources within the Western Shoreline area include the Olympic Country Club, Fort Funston, Lake Merced, the San Francisco Zoo, Ocean Beach, Sutro Heights Park, and the Cliff House and Sutro Baths.

The Area Plan includes ten subareas with specific policies that address transportation, circulation connectivity and conservation, such as Policy 2: "Provide transit connections amongst the important recreational destinations;" Objective 3: "Enhance the recreational connection between Golden Gate Park and the beach frontage;" Objective 4: "Improve the quality of the Zoo and its relationship to the Coastal Zone recreational system;" Policy 4: "Maintain and improve the physical connection and appearance of the Esplanade between Lincoln Way and the Cliff House;" and Objective 9: "Conserve the nature cliff environment along Fort Funston," among others. The draft ROSE Update, p. 22 states that the Western Shoreline "provides opportunities for enhanced access to the waterfront and recreational opportunities. The SFPUC is currently

exploring ways to improve access to the watershed lands in this area. If additional space becomes available, such as Harding Park, or the San Francisco Zoo, this space should provide improved connections from the neighborhood to the waterfront."

This concept is advanced by the draft ROSE Update objectives and policies, particularly by those related to Policy 1.5 ("Prioritize the activation of McLaren Park, Ocean Beach, the Blue Greenway and other underutilized significant open spaces."), Policy 2.4 ("Support the development of signature public open spaces along the shoreline."), and Objective 4 ("Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces."). The policies in the draft ROSE Update would not conflict with the Western Shoreline Area Plan.

Glen Park Community Plan

Glen Park is a small neighborhood located at the southern edge of the hills in the interior of the City, to the south of Diamond Heights and Noe Valley, west of Bernal Heights, and east of Glen Canyon Park. The Plan Area is served by several neighborhood parks and recreational facilities, including the 70-acre Glen Canyon Park, the Walter Haas Playground, Billy Goat Hill Park and Saint Mary's Playground/Recreation Center. Just outside of the plan area is Dorothy Erskine Park, Arlington Community Gardens, and Fairmont Plaza and Everson Digby lots that provide accessible open space to the public. The plan identifies a number of policies and associated recommended actions that may occur over time, including developing a conceptual landscape design for a greenway along the City-owned Bosworth Street parcels; building and maintaining an interconnected greenway path through the neighborhood; studying the feasibility and benefits of daylighting portions of Islais Creek through Glen Park; redesigning and reconfiguring the Glen Park BART station plaza and potentially adding small "parklets" in the neighborhood through the conversion of on-street parking stalls. The plan was adopted by the Board of Supervisors in February 2013. The policies in the draft ROSE Update would not conflict with the Glen Park Community Plan.

Transit Center District Plan

The Transit Center District Plan (TCDP) is a comprehensive plan for the southern portion of the downtown Financial District, roughly bounded by Market Street, the Embarcadero, Folsom Street, and Third Street. The area includes both private properties and properties owned or to be acquired by the Transbay Joint Powers Authority (TJPA) in and around the adopted Transbay Redevelopment Project Area (a plan for which was adopted in 2005) and the Transbay Terminal. The TCDP seeks to build on its established patterns of land use, urban form, public space, and circulation, and to make adjustments based on forecasting of local and regional job and population growth. The TCDP presents planning policies and controls for land use, urban form, and building design of private properties and properties owned or to be owned by the TJPA around the Transbay Transit Center, and for improvement and management of the District's public realm and circulation system of streets, plazas, and parks.

City Park, a 5.4-acre park planned to be located on the roof of the Transit Center would be the District's primary open space. As proposed, the park would be a self-sustaining ecosystem with a variety of both passive and active uses, educational experiences, special events, as well as habitat for local wildlife. Also part of the Transit Center development, Mission Square would serve as the

entrance to the new station at the corner of Fremont and Mission Streets. The square is designed to be a plaza underneath a vaulted glass-and-steel canopy that would include a funicular to lift visitors to the Transit Center Park above. On the block bounded Beale, Main, and new extensions of Tehama and Clementina Streets, the San Francisco Redevelopment Agency (SFRA) plans to build a new 1.1-acre Transbay Park once the Transit Center is operational. The plan also includes other ideas calling for the areas below the bus ramps serving the Transbay Transit Center, which could be improved with recreational amenities, such as sport courts or dog runs, to serve the neighborhood. The plan also includes a new half-acre public plaza at the northeast corner of Howard and Second Streets that would connect the Transit Center Park with the public realm at street level and provide a southern gateway to the Transit Center. Further, the plan includes mechanisms for directing necessary funding from increases in development to these purposes. The TCDP was adopted by the Board of Supervisors in May 2012. The policies in the draft ROSE Update would not conflict with the Transit Center District Plan.

Western SoMa Community Plan

The Western SoMa Community plan area is irregularly shaped and consists of two connected areas: one generally referred to as "north of Harrison Street," roughly bounded by 13th Street to the east, Bryant Street to the south, Seventh Street to the west, and Minna Street (an alleyway between Mission and Howard Streets) to the north, and the second area, generally referred to as "south of Harrison Street," roughly bounded by Townsend Street to the south, Fourth Street to the east, Harrison Street to the north and Seventh Street to the west. The Western SoMa Area Plan would amend the Western SoMa Special Use District (SUD) and would implement new planning policies and controls for land use, urban form, building height and design, street network and open space.

The Western SoMa neighborhood has approximately 0.23 acres of public parks serving its 8,363 residents (compared to about 7 acres of open space per 1,000 residents citywide). The plan states that "the need for developing new recreational space in Western SoMa is an imperative for existing and future neighborhood residents, workers and visitors." As such, the Plan's objectives pertaining to open space include: identifying new park sites based on public health and environmental recommendations and specific needs and conditions of the neighborhood; prioritizing public realm improvements; enhancing community diversity and pedestrian accessibility, safety and connections to transit; maintaining and developing at-grade yard patterns; promoting new sustainable and ecological open space, including public open space in private parcels, public gardens and public roofs; and measuring the impact of development in the neighborhood, and making it accountable for paying for public benefits. The Western SoMa plan was adopted by the Board of Supervisors in March 2013. The policies in the draft ROSE Update would not conflict with the Western SoMa Community Plan.

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¹⁸ *Draft Western SoMa Community Plan,* pg. 7:2. This document is available for review in Case File No. 2008.0877E at the Planning Department, 1650 Mission Street, Suite 400.

Plans and Policies: Draft Area Plans

The following is a brief description of a draft area plan, Central SoMa Plan, which has not yet been adopted and is undergoing environmental review. Adoption of the Central SoMa Plan requires future Planning Commission and Board of Supervisors review and action.

Central SoMa Plan (formerly, Central Corridor Plan)

The Central SoMa Plan is a comprehensive plan for the southern portion of the Central Subway transit line, an extension of the Third Street light rail line, in the South of Market neighborhood. The Plan area encompasses approximately 260 acres, and is bounded by Market Street to the north, Sixth Street to the west, Second Street to the east, and Townsend Street to the south. The project analyzed is the draft Central Corridor Plan (as it was then known) published in April 2013, as well as street network changes throughout the Plan area, including specific designs within, and in some cases extending beyond, the Plan area for the following streets: Folsom, Howard, Harrison, Bryant, Brannan, Third, and Fourth streets. The Central SoMa Plan identifies two height options for the Plan area. One of the primary objectives of the Plan is to propose an expanded network of open space and recreational uses to serve the existing and future population.

The Plan area encompasses an intensely developed urban area, and does not contain large regional park facilities, but does include a number of open spaces, one neighborhood park, and other recreational facilities. There is one existing facility managed by the SFRPD within the Plan area - South Park, located at South Park and Jack London Alley, between Second and Third streets and Bryant and Brannan streets. This is an approximately 1.2-acre, oval-shaped neighborhood park that contains a hummingbird garden, native plantings, benches, and a small playground area. The Plan proposes to develop an inter-connected network of open spaces and recreational facilities to enhance public health and livability within the Plan area and to improve pedestrian and bicycle access to existing recreational opportunities. Open spaces could include recreational amenities such as community gardens, athletic facilities, playgrounds, or other uses. To accommodate existing and future demand from residents as well as employees (e.g., on-site daytime population), the Plan would construct new publicly available spaces as well as a comprehensive pedestrian-friendly network to increase access to existing, new and improved spaces.

Other Plans and Policies

Former Redevelopment Projects

The San Francisco Redevelopment Agency, along with all 400 redevelopment agencies in California, was dissolved on February 1, 2012, by order of the California Supreme Court in a decision issued on December 29, 2011 (California Redevelopment Association et al. v. Ana Matosantos). In response, the City has created the Office of Community Investment and Infrastructure as the Successor Agency to the San Francisco Redevelopment Agency ("Successor Agency"). Under AB 26 and AB 1484, the Successor Agency is authorized to continue to implement three major redevelopment projects that were previously administered by the former Redevelopment Agency: 1) the Mission Bay North and South Redevelopment Project Areas, 2)

the Hunters Point Shipyard Redevelopment Project Area and Zone 1 of the Bayview Redevelopment Project Area, and 3) the Transbay Redevelopment Project Area (collectively, the "Major Approved Development Projects"). The Commission on Community Investment and Infrastructure exercises land use, development and design approval authority for the Major Approved Development Projects and manages the former Redevelopment Agency assets in YBC in place of the former San Francisco Redevelopment Agency Commission.¹⁹

The draft ROSE Update would not conflict with the policies contained in these projects, and the encouragement of new open spaces and recreational uses in appropriate areas would be, on balance, consistent with the open space related goals contained in these plans.

Waterfront Land Use Plan and Open Space Access

The Waterfront Plan was initially adopted by the Port Commission in 1997, defining acceptable uses, policies and land use information applicable to all properties under the Commission's jurisdiction, including the definition of locations for new public-private partnership projects coordinated with major public open space, maritime, and historic preservation improvements along the waterfront. The Design and Access Element of this Plan sets forth policies and site-specific design criteria to direct the location and types of public access and open spaces, public view corridors and urban design along San Francisco's waterfront. The draft ROSE Update would not conflict with the Waterfront Land Use Plan.

San Francisco Better Streets Plan

The Better Streets Plan describes a vision for the future of San Francisco's pedestrian environment and involves adoption of a set of citywide streetscape and pedestrian policies and guidelines to help accomplish this vision. The Better Streets Plan seeks to balance the needs of all City street users and identifies goals, objectives, policies and design guidelines, as well as future strategies to improve the pedestrian realm in San Francisco.

Major concepts covered in the Plan include: (1) pedestrian safety and accessibility features, such as enhanced pedestrian crossings, corner or mid-block curb extensions, pedestrian countdown and priority signals, and traffic calming features; (2) universal pedestrian design incorporating street trees, sidewalk planting, furnishings, lighting, efficient utility location, shared single-surfaces for small streets/alleys, sidewalk and median pocket parks, and temporary and permanent street closures to vehicles; (3) integrated pedestrian/transit functions using bulbouts and boarding islands; (4) enhanced usability of streetscapes for social purposes with reuse of excess street area, creative use of parking lanes, and outdoor restaurant seating; and, (5) improved ecological performance of streets and streetscape greening with incorporation of stormwater management techniques and urban forest maintenance.

In October 2010, the Planning Commission passed a resolution recommendation adoption of the Plan to the Board of Supervisors and in December 2010, the Board of Supervisors approved the Plan, which then became effective in January, 2011. Any Plan-proposed pedestrian realm

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¹⁹ Successor Agency to the San Francisco Redevelopment Agency. Available online at: http://www.sfredevelopment.org/index.aspx?page=1. Accessed February 10, 2014.

improvements would be analyzed in future site-specific street improvement projects, as part of the City's ongoing streetscape/pedestrian realm improvement efforts. The draft ROSE Update would not conflict with the Better Streets Plan.

Mission District Streetscape Plan

The Mission District Streetscape Plan's (or "MDSP") general boundaries are Division Street to the north, U.S. Highway 101 (U.S.-101) to the east, Precita Avenue/Mission Street/San Jose Avenue to the south, and Dolores Street to the west. The MDSP is an overall vision for the streetscape of the Mission District. It includes design framework and detailed policies, and site-specific streetscape improvement projects based on those policies. The MDSP would provide a framework to implement the policies of the Mission Area Plan, which was developed through the Eastern Neighborhoods planning process and adopted in December 2008. The MDSP does not include changes to public open spaces under the jurisdiction of the Recreation and Parks Department. It does, however, consider pedestrian and vehicular connections between such open spaces and the public right-of-ways. The MDSP would involve the implementation of site-specific streetscape improvement projects in the Mission District. These site-specific streetscape improvement projects are divided into two categories based on street type: 1) Alleys and Small Streets Projects; and 2) Streetscape Improvement Projects. Streetscape design elements to be implemented at specific locations under these two categories would include: raised crosswalks for alleys/narrow streets at intersections; chicanes; plaza improvements such as distinctive paving or artwork; permeable paving; new street trees; stormwater planters and other landscape improvements; bollards to demarcate protected pedestrian areas; seating; and pedestrian lighting. Implementation of the draft ROSE Update would not conflict with the Mission District Streetscape Plan.

San Francisco Bicycle Plan

In August 2009, the Board of Supervisors approved the San Francisco Bicycle Plan. The Bicycle Plan includes a citywide bicycle transportation plan and implementation of specific bicycle improvements. The Bicycle Plan includes objectives and identifies policy changes that would enhance the City's bicycle environment. It also describes the existing bicycle route network (a series of interconnected streets in which bicycling is encouraged), and identifies gaps within the citywide bicycle route network that require improvement. The draft ROSE Update includes policies that pertain to circulation as to "Encourage non-auto modes of transportation – transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces" (Policy 3.4). These policies are similar to those in the current ROSE that call for "Gradually eliminate[ing] non-recreational uses in parks and playgrounds and reduce automobile traffic in and around public open spaces." (Policy 2.4) The proposed policies and objectives within the ROSE Update would not conflict with the Bicycle Plan.

Golden Gate National Recreation Area Planning

The GGNRA encompasses a number of open space and parklands throughout Marin, San Mateo and San Francisco, including Alcatraz Island, Crissy Field, the Presidio and the majority of the City's public beaches. A major effort that began in 2011 is the Ocean Beach Erosion Control and Vision Planning process (see "Draft Ocean Beach Master Plan," below). The proposed policies

and objectives within the ROSE Update would not conflict with the Golden Gate National Recreation Area Planning efforts.

Golden Gate Park Master Plan

The Golden Gate Park Master Plan was adopted by the Recreation and Parks Commission in October of 1998. The Park Master Plan is a comprehensive planning document that includes general objectives and policies for the park, management strategies, and specific objectives and policies relating to park landscape, circulation, recreation facilities, visitor facilities and concessions, buildings and monuments, utilities and infrastructure, maintenance, operations and special subarea plans. As discussed in the Master Plan, the western portion of the park contains most of its larger meadows, lakes, and relatively natural areas, as well as facilities for activities and sports, and is more pastoral and sylvan than the eastern portion. The existing ROSE Policy 2.10 calls for the development of a Master Plan for Golden Gate Park. Since a Master Plan has been adopted, the current ROSE Policy 2.10 is proposed to be revised to "Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape" (draft ROSE Policy 1.4). The proposed policies and objectives within the ROSE Update would not conflict with the Golden Gate Park Master Plan.

Draft Significant Natural Resource Areas Management Plan

The RPD has developed a SNRAMP to address the restoration and management of the remaining aspects of San Francisco's original ecosystem. The SNRAMP contains detailed information on the biology, geology, and trails within 32 Natural Areas, 31 of which are in San Francisco and one (Sharp Park) is in Pacifica. The SNRAMP is intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years. The SNRAMP would be implemented by the Natural Areas Program, run by the RPD, and restore and enhance remnant natural areas of the City, while also developing and supporting community-based stewardship of these areas. The program also includes a number of volunteer opportunities to engage students, businesses, groups, and individuals in the stewardship of San Francisco's natural lands. The SNRAMP is currently under environmental review and is scheduled for adoption in 2014. The proposed policies and objectives within the ROSE Update would not conflict with the draft SNRAMP.

The Sustainability Plan

In 1993, the San Francisco Board of Supervisors established the Commission on San Francisco's Environment, charged with, among other things, drafting and implementing a plan for San Francisco's long-term environmental sustainability. The notion of sustainability is based on the United Nations' definition that "a sustainable society meets the needs of the present without sacrificing the ability of future generations and non-human forms of life to meet their own needs." The Sustainability Plan for the City of San Francisco was a result of community collaboration with the intent of establishing sustainable development as a fundamental goal of municipal public policy.

The Sustainability Plan is divided into 15 topic areas, 10 that address specific environmental issues (air quality; biodiversity; energy, climate change and ozone depletion; food and agriculture; hazardous materials; human health; parks, open spaces, and streetscapes; solid

waste; transportation; and water and wastewater), and five that are broader in scope and cover many issues (economy and economic development, environmental justice, municipal expenditures, public information and education, and risk management). Additionally, the Sustainability Plan contains indicators designed to create a base of objective information on local conditions and to illustrate trends toward or away from sustainability. Although the Sustainability Plan became official City policy in July 1997, the Board of Supervisors has not committed the City to perform all of the actions addressed in the plan. The Sustainability Plan serves as a blueprint, with many of its individual proposals requiring further development and public comment.

The Sustainability Plan includes four goals to create a sustainable civic landscape for San Francisco residents. The first goal is to provide attractive and numerous "vegetated oases and tree-lined streets." This goal includes an objective of providing a neighborhood park or open space within a 10-minute walk of every home, as well as an action calling for expansion of parks for broader public use to create new uses in underserved communities. The second goal is to maintain these vital resources. Goals 3 and 4, described as the basis of adequate maintenance, are to provide additional funding and to expand public participation, respectively. The draft ROSE Update includes policies that pertain to sustainability as to "Preserve, protect and restore local biodiversity" (Policy 4.1) and "Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities" (Policy 4.4). The draft ROSE Update would not conflict with the Sustainability Plan.

The Climate Action Plan for San Francisco

In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas (GHG) Emissions Reduction Resolution (Number 158-02) committing the City to a GHG emissions reduction goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the SFPUC published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Gas Emissions.²⁰ The Climate Action Plan provides the context of climate change in San Francisco and examines strategies to meet the 20 percent greenhouse gas reduction target. Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, the Plan serves as a blueprint for GHG emission reductions, and several actions have been implemented or are now in progress. The General Plan ROSE Update, in promoting new open spaces, would not conflict with the goals of the Climate Action Plan for San Francisco.

Draft Urban Forest Plan

The Draft Urban Forest Plan has been prepared and released in January 2014. The Plan was prepared by the Planning Department in coordination with the Department of Public Works. The plan promotes San Francisco's urban forest with a focus on street trees and identifies policies and strategies to proactively manage, grow and protect the City's street tree population. The draft

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²⁰ San Francisco Department of the Environment and San Francisco Public Utilities Commission, Climate Action Plan for San Francisco, Local Actions to Reduce Greenhouse Emissions, September 2004.

ROSE Update, including Policy 3.6 to "Maintain, restore, expand and fund the urban forest," would not conflict with the draft Urban Forest Plan.

In addition to the plans presented above, environmental plans and policies, like the Bay Area 2010 Clean Air Plan (CAP), directly address physical environmental issues and/or contain standards or targets that must be met in order to preserve or improve specific components of the City's physical environment. The draft ROSE Update would not obviously conflict with those plans.

Other Citywide Policies and Studies

Proposition C and the Recreation and Park Acquisition Policy

In 2000, San Francisco voters approved Proposition C, extending the Open Space Fund that is used to finance acquisitions and capital improvements for the RPD. The legislation created an annual set-aside of two and one-half cents for each one hundred dollars assessed valuation from the property tax levy. The Open Space Fund is funded through Fiscal Year 2030-2031. The legislation stipulates that at least five percent of the revenue raised through the set-aside be allocated to new land acquisition. In 2006, the RPD, at the request of the Recreation and Parks Commission, published the Recreation and Park Acquisition Policy to provide clear guidelines for the expenditure of acquisition funds under the Recreation and Park Commission's jurisdiction, followed by a comprehensive revision in 2011 which created a clear guidebook for the public and the department to the latest process and acquisition policies

The first policy in this document is to prioritize acquisition in areas with high needs as well as areas with park distribution deficiencies. These criteria align with the criteria used for Recreation and Open Space Element Map 6, which identifies priority renovation and acquisition areas Maps 4A to 4C illustrate each of the variables use including: population, density, age, and income. The distribution deficiency is illustrated in Maps 3A to 3C.

Recreation Assessment Report

In August 2004, the RPD published a *Recreation Assessment Report* that evaluates the recreational needs of San Francisco residents. Nine service maps were developed for the report. The service area maps were included to help RPD staff and key leadership assess where services are offered, how equitable the service delivery is across the City, and how effective the service is in serving the needs of key demographic groups – families with children, the elderly and low-income households.

Proposition B: Clean and Safe Neighborhood Parks Bond

As part of the City's 10-year Capital Plan, the RPD and the Port introduced a parks and open space general obligation capital bond ("Proposition B") on the November 2012 ballot to address the capital needs of the City's open space system. The 2012 Bond gave the department an additional \$195 million to continue capital projects for the renewal and repair of its parks, recreation, and open space assets. This Bond includes funding for 15 neighborhood parks, which were determined through a comprehensive outreach process in the preceding year. These park improvement projects include: neighborhood parks selected based on community feedback, their

physical condition, the variety of amenities offered, seismic safety risk, and neighborhood density, waterfront open spaces, failing playgrounds, investments in Golden Gate Park, Lake Merced, and McLaren Park, as well as Community Opportunity Fund, as well as forestry, trails, and water conservation.

Proposition M: the Accountable Planning Initiative

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the *Planning Code* to establish eight Priority Policies. These policies, and the subsection of Section E of this Initial Study addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Topic 1, Land Use and Land Use Planning, Question 1c); (3) preservation and enhancement of affordable housing (Topic 3, Population and Housing, Question 3b, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Topic 5, Transportation and Circulation, Questions 5a, 5b, and 5f); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Topic 1, Land Use and Land Use Planning, Question 1c); (6) maximization of earthquake preparedness (Topic 14, Geology and Soils, Question 14a through 14d); (7) landmark and historic building preservation (Topic 4, Cultural Resources, Question 4a); and (8) protection of open space (Topic 9, Wind and Shadow, Questions 9a and 9b; and Topic 10, Recreation, Questions 10a and 10c).

Prior to issuing a permit for any project which requires an Initial Study under the CEQA, prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the General Plan, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in Section E, Evaluation of Environmental Effects, of this Initial Study, providing information for use in the approval for the proposed project.

The consistency of the ROSE Update with the environmental topics associated with the Priority Policies is discussed in Section E, Evaluation of Environmental Effects, which provides information for use in the case report for ROSE Update. The case report and approval motions will contain the Planning Department's comprehensive project analysis and findings regarding consistency of the ROSE General Plan Amendment with the Priority Policies.

Approvals Required

After completion and adoption of the environmental review document by the Planning Commission, the approvals required for the draft 2013 ROSE Update are as follows:

Planning Commission General Plan amendment initiation, with the Commission's recommendation of approval, approval with modification, or rejection of the draft ROSE Update to the Board of Supervisors. The Planning Commission must find that public necessity, convenience and general welfare require the proposed amendment.

Recommendation for rejection of a proposed amendment by the Planning Commission can be appealed to the Board of Supervisors.

Board of Supervisors Ordinance adopting the draft ROSE Update.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

follo	wing pages present a more o	detailed checklist and discussion	of ea	ch environmental factor.
	Land Use	Air Quality		Biological Resources
	Aesthetics	Greenhouse Gas Emissions		Geology and Soils
	Population and Housing	Wind and Shadow		Hydrology and Water Quality
	Cultural and Paleo. Resources	Recreation		Hazards/Hazardous Materials
	Transportation and Circulation	Utilities and Service Systems		Mineral/Energy Resources
	Noise	Public Services		Agricultural and Forest Resources
				Mandatory Findings of Significance

The proposed project could potentially affect the environmental factor(s) checked below. The

This Initial Study examines the project to identify potential effects on the environment. All items on the Initial Study Checklist that have been checked "Less than Significant Impact," "No Impact" or "Not Applicable" indicates that, upon evaluation, staff has determined that the draft ROSE Update could not have a significant adverse environmental effect relating to that topic. A discussion is included for those issues checked "Less than Significant Impact" and for most items checked with "No Impact" or "Not Applicable." For all items checked "Not Applicable" or "No Impact" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Database (CNDDB) and maps, published by the California Department of Fish and Wildlife (CDFW).

On the basis of this study, the draft ROSE Update would not result in adverse physical effects on the environment; all issues are discussed in Section E below. Cumulative impacts are also discussed in Topic E-19 Mandatory Findings of Significance, beginning on p. 138 in this Initial Study.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Тор	pics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
1.	LAND USE AND LAND USE PLANNING— Would the project:					
a)	Physically divide an established community?			\boxtimes		
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?					
c)	Have a substantial impact upon the existing character of the vicinity?					

Impact LU-1: Implementation of the draft ROSE Update would not physically divide established communities. (Less than Significant)

There are 220 parks, open spaces and recreational facilities located throughout the City comprising over 5,890 acres, or about 23 percent of the City's total land area. Some of these facilities are located in residential areas (e.g., Koshland Park, Buena Vista Park, Alamo Square, and McCoppin Square); some are located in, or border on, commercial mixed-use areas (e.g., Patricia's Green, Washington Square, Portsmouth Square, and South Park); some are in transitional industrial neighborhoods (e.g., Esprit Park), on the City's waterfront edge, or in the City's natural areas (e.g., Ocean Beach, Presidio, Aquatic Park, Maritime National Historic Park, Rincon Park, India Basin Shoreline Park, and Glen Canyon Park). Under implementation of the draft ROSE Update, the City's parks, open spaces and recreational facilities are expected to continue in their established locales and interrelate with their surrounding land uses in the future as they currently do, and the draft ROSE Update policies would not physically divide existing communities.

The draft ROSE Update's objectives and policies would not eliminate existing recreational facilities. Instead, the draft policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provides a high level of service to their users with numerous amenities. As explained in the Open Space Framework and in the draft ROSE Update, the City would retain existing parks and open spaces (e.g., Policy 1.4) and develop new spaces over time in high needs areas consistent with residential growth, overall demand and other socio-economic factors (e.g., high-needs areas where there is a combination of high density, high percentages of children, seniors, and households with low incomes, etc. as discussed in Policy 2.1). The draft ROSE Update's policies would therefore help better connect parks and recreational facilities to the communities they serve rather than divide them.

As such, the ROSE Update policies and its implementing measures would not disrupt or divide neighborhoods.

Impact LU-2: The draft ROSE Update would not conflict with applicable land use plans, policies or regulations adopted for the purpose of avoiding or mitigating an environmental effect. (No Impact)

As discussed under *Subsection C. Plans and Policies* of this Initial Study, the draft ROSE Update objectives and policies would not conflict with the General Plan, its Elements, Area Plans or pertinent sections of the Code or other regulations or programs so as to cause substantial, adverse environmental effects. In addition, the draft ROSE Update would also not conflict with other plans, policies or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Roughly one-half of the objectives and policies in the draft ROSE Update (e.g., 23 of the 39 total policies) correlate to existing policies and objectives in the current ROSE, and promote similar policies to those in the existing ROSE. In instances where the draft ROSE Update introduces new objectives and policies, these generally relate to sustainability, management, and environmental stewardship, such as Objective 4 ("Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces") and subordinate policies (e.g., Policies 4.1, 4.2, and 4.3), Objective 5 ("Engage communities in the stewardship of their recreation programs and open spaces") and management, Objective 6 ("Secure long-term resources and management for open space acquisition, operations and maintenance."). Implementation of these objectives and policies would not result in conflicts that would cause substantial adverse physical effects.

Impact LU-3: The draft ROSE Update would not have a substantial impact upon the City's existing character. (Less than Significant)

The character of existing parks, open spaces and recreational facilities is defined by the physical attributes, activities and uses that occur at specific locations and how these spaces physically relate to their local communities. The City's parks and open spaces afford a variety of opportunities for recreation and respite including walking paths, hiking, sports facilities, open grass areas for lounging and relaxation, dog runs, playgrounds, cultural attractions, guest amenities and facilities, and events as described in the Environmental Setting of this Initial Study. Draft ROSE Update Objective 1 calls for "Ensure a well-maintained, highly utilized, and integrated open space system." Draft ROSE Policy 1.1 encourages "the dynamic and flexible use of existing open spaces and promote a variety of open space uses, where appropriate," which is similar to Policy 4.1 in the current ROSE that focuses on making "better use of existing facilities." While no specific projects are currently proposed, the draft ROSE Update presents the general type of activities that could be considered in the context of proposed Policy 1.1 in the future including the following options:

- Provide recreational opportunities that respond to user demographics and emerging recreational needs.
- Include innovative community-driven uses such as food production, education, and improved streetscaping.

- Design open spaces that include both active programming and passive uses in tranquil spaces.
- Provide programming for healthy and active lifestyles.
- Add user amenities such as concessions that cater to and attract visitors.
- Expand opportunities for temporary uses such as festivals, art, performances, and farmers markets.
- Allow active engagement with natural areas through public access trail, wildlife observation, birding, and educational displays and programs.
- Increase cultural programming and activities based on neighborhood need and interest.
- Provide spaces and structures that encourage unstructured natural play.

The above uses are considered potential ancillary activities to primary park and recreational uses. As described in the draft ROSE (p. 9), these spaces should be "redesigned to better serve the needs of the surrounding neighborhood, while ensuring a flexible design to adapt to changing neighborhood needs over time." As described in the Environmental Setting section of this Initial Study, a large number and wide variety of these types of ancillary uses, concessions, special events and activities currently take place in the City's parks, and are expected to continue to occur in the future. Any future proposals that encompass the above types of activities would be subject to RPD's permitting requirements and covenants, as well as to project-specific environmental review, if any such specific proposal is determined to have the potential to result in physical environmental effects.

The draft ROSE Update also includes Policy 1.3 "Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of open space." This policy is similar to existing ROSE Policy 2.2, "Preserve existing open space." This policy ensures that the character of parks and their surrounding vicinities are not adversely altered through conversion to another land use. When future proposals occur, the draft ROSE Update sets forth the following procedures and criteria for reviewing potential proposals for new or expanded buildings and uses in parks:²¹

Proposals for Non-recreational Uses on RPD Land

Decisions related to non-recreational uses on RPD land shall conform to the San Francisco Charter Section 4.113. The Charter requires a vote of the electors for park property to be sold or leased for non-recreational purposes or to build any structure for non-recreational purposes on park property.

Proposals for Permanent New or Expanded Recreation and Cultural Buildings, and Supporting Facilities on RPD Land

The draft ROSE Update, Policy 1.3, sets forth the following criteria for permanent new recreation and cultural buildings and supporting facilities in existing parks and open spaces:

²¹ The listed criteria comprise the key open space and recreation criteria that the Planning Department uses as part of its "General Plan Referral" review process. These criteria are weighed with others in the General Plan to determine whether an undertaking on public property is, on balance, consistent with the General Plan.

- Facility directly serves and improves the existing open space by supporting better utilization of space while continuing to provide access and respond to the needs of the local community.
- Facility is limited in size. The size will vary by open space, but the size shall be limited to
 the smallest footprint appropriate and feasible for the proposed use, taking into account
 the intensity of the use, expected participants and spectators, as well as other relevant
 factors.
- Facility incurs limited impacts on the exiting open space (because of a preponderance of nearby outdoor open space or other factor), or the projected benefits outweigh the impacts.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.

The draft ROSE Update, Policy 1.3 also notes that, "a loss of open space resulting from approval of the proposed facility should be offset with replacement open space of equal or higher quality."

New and Expanded Facilities in Non-RPD Open Spaces

Many of the City's open space sites are under the jurisdiction of public agencies other than the RPD, including the Port, the SFPUC, the Office of Community Investment & Infrastructure, and the Department of Public Works (DPW). Many of these spaces are often intended for public uses other than recreation, so the sites' role as open space is secondary to the primary use. Draft ROSE Update, Policy 1.3 (p. 11) states that decision-making bodies should analyze all of the following criteria in making their determinations on new and expanded facilities in non-RPD open spaces:

- Facility is necessary to provide the public service of the agency holding the site in question.
- A clear rationale exists for siting the facility, articulating the advantages of the proposed site compared to reasonable alternatives.
- Facility incurs limited impacts on the existing open space (because of a preponderance of nearby outdoor open space or other factor), or the projected benefits outweigh the impacts.

The proposed objectives and policies in the draft ROSE Update would not result in a substantial adverse effect on the City's parks, recreation and open spaces or the character of the communities surrounding them. As illustrated under Impact LU-3, above, the current procedures for evaluating changes to programming or new or altered uses on public parks would continue, in addition to new criteria, which address off-setting conversion of park/open space property. Moreover, specific future proposals including, but not limited to, those listed above could require focused environmental review if the proposal has the potential to result in physical changes to the environment.

At the policy level, implementation of the Open Space Framework, draft ROSE Update would not adversely affect the character of the City's parks and open spaces. As such, potential land use impacts of the draft ROSE Update are less than significant, both individually and cumulatively.

Impact C-LU: Implementation of the draft ROSE Update, in combination with past, present and reasonably foreseeable future projects, would not have a substantial adverse cumulative impact to land use. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant land use impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,²² the 2012 Parks Bond,²³ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. As discussed above, implementation of the draft ROSE Update would result in less-than-significant land use impacts. Implementation of the draft ROSE Update would not contribute in a cumulatively considerable way to divide an established community or conflict with plans, policies, and regulations. Therefore, the project would not result in any significant cumulative land use impacts.

Тор	vics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
2.	AESTHETICS – Would the project:					
a)	Have a substantial adverse effect on a scenic vista?					
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?					
c)	Substantially degrade the existing visual character or quality of the site and its surroundings?					

²² SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

²³ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Topics:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?					

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area;
- b) The project is on an infill site; and
- c) The project is residential, mixed-use residential, or an employment center.

The draft ROSE Update would not meet the above criteria. In addition, future construction activities that may result from the draft ROSE Update would not meet criterion c) above. Therefore, this checklist considers aesthetics in determining the significance of project impacts under CEQA.

Aesthetic Character

The visual setting of the City is varied, reflecting the unique visual characteristics of its topography, street grids, public open spaces, built environment and distinct neighborhoods. San Francisco's skyline is characterized by a general pattern of densely clustered high-rise commercial development in the downtown core that tapers off to low-rise development at its periphery. This compact urban form signifies the downtown as the center of commerce and activity and produces a downtown "mound," distinctive in views from the City's numerous hills. Outside of the highly commercial and built-up downtown core, much of the City is characterized by unique residential neighborhoods, each of which exhibits its own distinctive visual character. Neighborhoods within the City vary greatly in terms of density, scale, architectural style, and general design pattern.

Parks, open spaces and recreational facilities contribute to neighborhood aesthetic character and in some instances also to the image and identity of the City as a whole. In particular, Golden Gate Park, Lincoln Park, the Presidio, Sutro Heights Park and McLaren Park are some of the City's largest open spaces. Heavily landscaped, the expanse of these parks allows users to experience a green counterpoint in contrast to, and sometimes isolated from, the City's surrounding urban character. Golden Gate Park accommodates a number of the City's premiere cultural institutions, attractions and some concessions in a park setting, including the California Academy of Sciences,

De Young Museum, the Jack Hirose Tea Garden, and the Strybing Arboretum and Botanical Gardens.

The General Plan's Urban Design Element, p. I.5.38 states, "The most satisfying recreation space is close and visible, with a feeling of nature and a variety of facilities for all age groups. Such recreation space may be found on private properties, in neighborhood parks, along the sidewalks and in undeveloped street areas. On a citywide scale, larger recreation facilities that require travel away from home provide an even greater variety of opportunities. On this larger scale, the shoreline of San Francisco Bay has a potential that is not fully used." Situated on the City's edge, Ocean Beach, Sutro Heights Park, Fort Funston, Lincoln Park, the ruins of Sutro Baths; the Palace of the Legion of Honor, Crissy Field with its shoreline promenade trail, beaches, picnic tables, and tidal marsh overlooks; and Candlestick Point State Recreation Area capitalize on their locations by providing water-based recreational activities such as wind surfing, swimming and self-guided walks, as well as expansive views of the Golden Gate and Bay Bridges, Pacific Ocean, and the San Francisco Bay.

The General Plan's Urban Design Element, p. I.5.25 highlights "special characteristics of outstanding and unique areas in Telegraph Hill, Russian Hill, Pacific Heights, Buena Vista and Dolores Heights." Parks in these neighborhoods are often located on the tops of hills or on sloped hillsides (e.g., Pioneer Park, Russian Hill Park, Alta Plaza, Alamo Square, Lafayette Square, Buena Vista Park, Dolores Park, etc.). These spaces generally afford outstanding views of the Bay or the Downtown skyline. The General Plan attributes the high aesthetic quality of these spaces in relation to the neighborhoods surrounding the parks: "When large parks occur at the tops of hills, low-rise buildings surrounding them will preserve views from the park and maintain visibility of the park from other areas of the city."

Washington Square Park, Jackson Square, Franklin Square, Boedekker Park, Portsmouth Square, Union Square, Jefferson Square and the like reflect an urban character, and provide visual relief, public gathering space and respite in contrast to their dense and built up surroundings. These spaces are often characterized by turf or paved plaza areas, some with formal seating; levels of user intensity vary. Neighborhood recreation centers also contribute to the character of the vicinity and often include moderately scaled buildings housing sports or community facilities, some of which surround residential areas, such as the Joe DiMaggio pool and clubhouse in North Beach, the Hamilton Recreation Center in the Western Addition and the Gene Friend Recreation Center in SoMa. In Downtown, high-rises are interspersed with privately-owned, publicly accessible open spaces, which vary in quality, available amenities and intensity of use. Some of these spaces, like Redwood Park, are placid and include redwoods, sculptures and water features. Others are interior spaces used primarily during midday (101 Second Street); some are located on rooftops (Crocker Galleria); while others are heavily used snippets of street space with stand-up tables and seating areas adjacent to food services and transit (One Post Street).

Views

A "viewshed" refers to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that render an area its visual boundary and context, which are often both characterized by and contrast with urban development in San Francisco.

Known for its abundance of natural beauty and panoramic views, San Francisco is surrounded on three sides by water and featured by parks, lakes, and vistas. The Pacific Ocean, San Francisco Bay and their respective shorelines are considered by many to be the City's most lauded natural resources, offering significant opportunities for scenic views. The City's natural hills and ridges also define neighborhoods and provide contrast to the spacious setting provided by the bay and ocean waters. The City contains many open spaces and landscaped areas whose rich green colors help to further define and identify hills, districts, and places for recreation. These areas include the Presidio, Lake Merced and Golden Gate parks as well as smaller but prominent locations such as Alta Plaza, Lombard Street Hill, and Coit Tower, among others. These varied resources result in scenic viewpoints available at numerous locations from within the City and from approaches to the City.

The City contains many prominent viewsheds. The several roadways approaching and within the City provide views of the cityscape, the Golden Gate and Bay bridges, urban forests such as the Presidio and Golden Gate Park, and important historic or architectural landmarks such as the Palace of Fine Arts, Grace Cathedral, and the Ferry Building. Aside from the waters of the Bay, easterly views in the City are generally urban in character, with high-rise buildings visible at the Civic Center, and in downtown along Market Street.

The areas of the City within the elevated topography of Twin Peaks including Mt. Sutro, Mt. Davidson, Mt. Olympus, Glen Canyon, Buena Vista, and Forest Hill are typically provided with panoramic views of the City. Persons at the top of these inclines enjoy 360-degree views, which include the Bay, the downtown skyline, the Pacific Ocean, the Golden Gate and Bay bridges, and several other San Francisco landmarks and visual resources. Due to the proximity to the ocean and parks and open spaces, westerly views of the City generally appear more natural than those of the east. Low lying areas and valleys, such as Noe Valley, the Castro, Hayes Valley, and Cole Valley benefit from views of surrounding topography, and the hills and ridges themselves are aesthetically pleasing features. Sutro Tower, located southeast of Mt. Sutro, is a dominant part of the skyline in the central part of the City.

The General Plan's Urban Design Element concerns itself with the physical character of the City and the relationship between people and the environment. Figure 3 illustrates the City's important vistas to be protected according to the General Plan. The vistas are located throughout the City in areas of higher elevation or adjacent to the ocean or bay in areas including Buena Vista Park, Potrero Hill, Grand View Park, Bayview Park, and Alta Plaza Park. These parks and open spaces provide urban relief and views of the surrounding topography. Furthermore, the General Plan, p. I.5.2 states that water is a primary component of the City's pattern and includes "the Bay and the Ocean, which are boundaries for the City and a part of its climate and way of life. The water is open space, a focus of major views and a place of human activity." Merced

Heights and Ocean View take in views of the Pacific Ocean, Lake Merced and Harding Park to the West, and the northern slope of San Bruno Mountain to the south. San Francisco Bay, Treasure Island, and the Bay Bridge can be seen from the elevated areas atop Bernal Heights Park, McKinley Square, Bayview Park, and Twin Peaks.

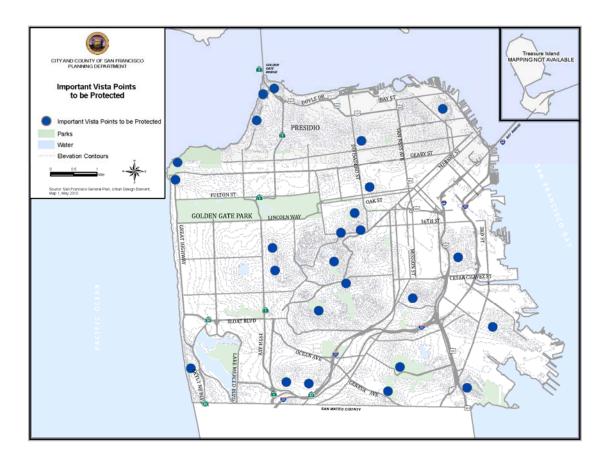


Figure 2: Important vistas to be protected

Impact AE-1: The draft ROSE Update would not have a substantial adverse effect on scenic vistas or damage scenic resources. (Less than Significant)

A review of the objectives and policies in the proposed draft ROSE Update (see Table 1, beginning on p. 5) indicate that none would have the potential to directly alter scenic vistas or damage scenic resources. Indirect effects associated with implementation of Policy 1.1: "Encourage the dynamic and flexible use of existing open spaces and promote a variety of open space uses, where appropriate;" Policy 1.2: "Prioritize renovation of highly-utilized open spaces and in high needs areas;" and Policy 1.7: "Support public art as an essential component of open space design" could result in new uses, structures, public art or landscaping that may be visible from within or along publicly-accessible perimeters of parks or open spaces, and may consequently change views of, or from, these parks and open spaces. This impact is not considered significant based on the fact that corresponding policies currently exist in the ROSE

that direct the City to: "Make better use of existing facilities" (Policy 4.1) and "Renovate and renew the City's parks and recreational facilities" (Policy 4.3). Furthermore, as discussed under LU-3, review procedures currently exist that regulate potential physical alteration, including new buildings and ancillary uses, in parks and open spaces. Therefore, the degree of potential physical change associated with these policies is considered minimal, because these policies reflect a continuation of existing policies and therefore a continuation of existing visual conditions.

Streets contribute substantially to open space in the City. The often regular, rectilinear street grids act as open, long-range view corridors through many of the City's neighborhoods. Policy 3.1 calls for "Creatively develop[ing] existing publicly-owned right-of-ways and streets into open space," which builds on existing Policy 4.7 that calls for "Provid[ing] open space to serve neighborhood and commercial districts." The effect of this policy, if carried out as described on pp. 33-34 of the draft ROSE Update, could be that certain streets may be altered to accommodate additional landscaping and "living streets" treatments, which may include new pedestrian seating areas, special pavers, and additional landscaping, which would be guided according to the street-typologies in the Better Streets Plan. Because trees are common elements in viewsheds along the perimeters of city streets, additional greening efforts that could occur associated with this policy or related implementation actions would not have a substantial, adverse effect on views.

The policies in the draft ROSE Update would not alter or otherwise amend existing height districts, typically designated as "OS Height and Bulk Districts" on Zoning Maps, which establish height districts open spaces and parks. As described in the Plans and Policies section in this Initial Study, "the height and bulk of buildings and structures are determined in accordance with the objectives, principles and policies of the General Plan, and no building or structure or addition thereto shall be permitted unless in conformity with the General Plan. The inclusion of land in Open Space Districts is intended to indicate its principal or exclusive purpose as open space, with future development of any character strictly limited." The policies would also not conflict with or adversely affect scenic vistas, specifically related to the "special characteristics of outstanding and unique areas in Telegraph Hill, Russian Hill, Pacific Heights, Buena Vista and Dolores Heights" as described in the Urban Design Element, because the policies would not affect the "low-rise buildings surrounding [outstanding and unique areas, and thus would]...preserve views from the park and maintain visibility of the park from other areas of the city."

Based on the above, the draft ROSE Update's policies and objectives would not have a substantial adverse effect on scenic vistas or damage scenic resources, thus this impact is considered less than significant.

Impact AE-2: The draft ROSE Update would not degrade the City's aesthetic character. (Less than Significant)

As discussed in the Environmental Setting of this Initial Study, the City's parks, open spaces and recreational facilities are diverse and provide a variety of amenities and activities to City residents and users. Each space has its own unique aesthetic character, depending on the size,

location, topography, type of vegetation and activities provided at the facility. Some spaces are characterized by formal spatial arrangements in urban settings (e.g., Civic Center Plaza, Justin Herman Plaza, etc.), while other spaces are characterized by their natural settings, with informal programming for passive uses (e.g., Kite Hill, Bernal Heights Park). Size, programming and type of amenity notwithstanding, the General Plan's Urban Design Element, p. I.5.49 states, "The more visible the recreation space is in each neighborhood, the more it will be appreciated and used."

The Urban Design Element underscores "Opportunities for Recreation," based on the following policies: "Provide convenient access to a variety of recreational opportunities" (Policy 8); "Maximize the use of recreation areas for recreation purposes." (Policy 9); "Encourage or require the provision of recreation space in private development." (Policy 10); and "Make use of street space and other unused public areas for recreation" (Policy 11). These policies relate to existing ROSE Policy 4.1, "Make better use of existing facilities;" Policy 4.5, "Require private usable outdoor open space in new residential development;" and Policy 4.6, "Assure the provision of adequate public open space to serve new residential development." As stated above, the level of activity, specific location of the park or recreational facility, its level of maintenance, and its relation to the surrounding setting, defines the aesthetic character of a particular park or open space. The Open Space Framework, the draft ROSE Update's policies, as illustrated in Table 1 of Project Description, do not represent a substantial departure from the existing policy context.

As described under Impact LU-3, the draft ROSE Update proposes to continue existing Planning Department review criteria through the General Plan referral process²⁴ that would address proposals for new, altered and/or expanded structures in parks and open spaces. These criteria call for future facilities to be limited in size, to demonstrate how surrounding open space would be improved by any potential new structures or expansions, and to provide additional open space in the form of activated programming, enhanced streetscaping, or to return space currently used by a structure to open space, if feasible.

Any future projects related to the implementation of the draft ROSE Update policies that include the alteration, demolition, or construction of buildings, recreational spaces, or open spaces would be subject to project-specific environmental review to evaluate potential impacts to aesthetic character. Because the draft ROSE Update's policies and objectives would not be considered to

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[&]quot;General Plan Referral" is a review process established by San Francisco Charter Section 4.105 and Sections 2A.52 and 2A.53 of the San Francisco Administrative Code for certain types of projects. The Planning Department or Planning Commission is required to review the project and determine whether a project is in conformity with the General Plan, prior to Board of Supervisors' consideration of an ordinance or resolution approving the project. The types of projects that trigger submittal of a General Plan Referral application include: 1) property acquisition, sale or lease by the City; 2) ordinances concerning the extension, widening, narrowing, removal, relocation, vacation, abandonment, sale or change in the use of any public way, transportation route, ground, open space, building, or structure owned by the City and County; 3) subdivisions of land within the City and County; 4) projects for the construction, improvement of, or demolition of City-owned buildings or structures within the City and County; 5) programs that link the General Plan to the allocation of local, state and federal resources, the City's annual capital expenditure plan, six-year capital improvement program, a capital improvement project or a long-term financing proposal, general obligation or revenue bonds or nonprofit corporation proposals; 6) project plans for public housing, or publicly assisted private housing in the City and County; 7) proposed Redevelopment project plans within the City and County; or 8) substantial change to the above.

degrade the existing aesthetic character of the City's parks, open spaces and other recreational facilities, this impact is considered to be less than significant.

Impact AE-3: The draft ROSE Update would not create new sources of substantial light or glare which would substantially impact other people or properties. (Less than Significant)

Existing recreation and park facilities, such as clubhouses, tennis and basketball courts, and some fields where permitted games are held, currently have night-lighting.²⁵ Light standards generally include shielded lamps, with the cone of light focused on the play area to reduce light spillover onto adjacent areas. The RPD illuminates these spaces until about 10 p.m. Cars traveling to, and sometimes through parks (e.g., Golden Gate Park) are also dynamic sources of light and glare during evening hours.

The draft ROSE Update also includes Policy 1.10 to "Ensure that open space is safe and secure for the City's entire population," which addresses, among other things, the provision of clear sightlines; adequate and appropriate lighting for safety and way-finding purposes and increasing park usership to increase "eyes on the park." In addition, City Resolution 9212 prohibits the use of highly reflective or mirrored glass in new construction. New development would be required to comply with this resolution. Based on the foregoing, the objectives and policies in the draft ROSE Update would not result in substantial light and glare impacts on people or properties.

Impact C-AE: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial adverse cumulative impact on aesthetic resources. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant aesthetics impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,²⁶ the 2012 Parks Bond,²⁷ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to

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Permitted fields or other recreation facilities that are illuminated during night-time hours include: Crocker soccer fields and diamond; Excelsior clubhouse; Franklin, Garfield, Jackson, Lang, Rolf Kimball, and Moscone fields; Silver Terrace; Sunset and West Sunset Recreation Centers; the Youngblood Coleman Recreation Center in the Bayview; and Beach Chalet, in the western end of Golden Gate Park. Kezar Stadium is also illuminated at night for special sporting events. Personal communication, Dana Ketcham, Permits and Reservations Manager, Recreation and Parks Department, June 20, 2011. Available for review at the Planning Department, 1650 Mission Street, Suite 400 in Case File No. 2010.0641E.

²⁶ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

²⁷ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. As stated above, implementation of the draft ROSE Update would result in less-than-significant effects related to aesthetics. Implementation of draft ROSE Update would not contribute in a cumulatively considerable way to substantially degrade views, damage scenic resources, degrade the existing visual character of the area, or create new sources of substantial light or glare. For the reasons discussed above, the proposed project's impacts related to aesthetics, both individually and cumulatively, would be less than significant.

Topics:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
3.	POPULATION AND HOUSING— Would the project:					
a)	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?					
b)	Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?					
c)	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?					

In general, a project would be considered growth-inducing if its implementation would result in a substantial population increase and/or new development that might not occur if the project were not implemented. As of 2010, the U.S. Census Bureau indicates that the City's total population is approximately 805,235 persons.²⁸ The Planning Department routinely prepares projections for the purpose of analyzing plans and projects undergoing environmental review. While the assumptions of these data sets may vary depending on the circumstances surrounding a specific project, the Department recently completed a citywide projection capturing citywide growth expectations by 2030 designed to closely match the recently adopted Association of Bay Area Governments (ABAG) *Projections* 2009 target, which take into account local knowledge of projects currently in various stages of the entitlement process, commonly referred to as the development pipeline. Table 3 shows population and housing projections through the horizon year of 2030.

²⁸ U.S. Census Bureau. State & County QuickFacts, San Francisco County, California. Available online at: http://quickfacts.census.gov/qfd/states/06/06075.html. Accessed February 19, 2014.

Table 3: Household Population and Jobs Forecast: 2000-2030

	2000	2005	2030	Growth 2000-2030	Growth 2005-2030
Households	329,700	341,478	403,292	73,592	61,814
Household Population	756,976	783,441	916,800	159,824	133,359
Jobs	642,500	533,090	748,100	105,600	195,010

Sources: ABAG, San Francisco Planning Department, 2011.

Impact PH-1: Implementation of the draft ROSE Update objectives and policies would not induce substantial population growth in San Francisco, either directly or indirectly. (No Impact)

The objectives and policies in the draft ROSE Update address parks, open spaces (including streets) and recreational facilities. As shown in Table 3, above, the City projects growth in overall households, household population, and jobs to occur in the near future. The draft ROSE Update does not include policies or objectives that directly resulting in development of new or renovated housing or fostering economic development, such as jobs.

In recognition of potential population growth in the City, the existing ROSE and draft ROSE Update contain policies that call for the preservation of existing open space (Policy 1.3) as well as policies that call for "Increas[ing] open space to meet the long-term needs of the city and bay region" (Objective 2) in addition to "Prioritize renovation in highly-utilized open spaces and in high needs areas (Policy 1.2)."

The draft ROSE Update would not induce substantial population growth either directly or indirectly. Therefore, the draft ROSE Update would not substantially impact the City's population growth.

Impact PH-2: Implementation of the draft ROSE Update would not displace existing housing units or create demand for additional housing, necessitating the construction of replacement housing. (No Impact)

The draft ROSE Update objectives or policies, similar to those in the existing ROSE, would neither displace existing housing units nor create demand for additional housing. As such, the draft ROSE Update would have no direct or cumulative impacts on population and housing.

Impact C-PH: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial adverse cumulative impact on population and housing. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to population and

housing. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,²⁹ the 2012 Parks Bond,³⁰ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. As discussed above, implementation of the draft ROSE Update would result in less-than-significant impacts related to population and housing. In addition, implementation of the draft ROSE Update would not contribute in a cumulatively considerable way that would induce substantial population growth and would not displace substantial numbers of people or existing housing units. For the reasons discussed above, the proposed project's impacts related to population and housing, both individually and cumulatively, would be less than significant.

Тор	oics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
4.	CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco <i>Planning Code</i> ?					
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?					
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?					
d)	Disturb any human remains, including those interred outside of formal cemeteries?					

Historical architectural resource impacts are considered to be significant if adoption of the draft ROSE Update would cause a substantial adverse change in the significance of an historical resource (CEQA Section 21084.1). The assessment of potential impacts on "historical resources," as defined by CEQA Guidelines Section 15064.5, is a two-step analysis. First, a determination is made as to whether a Project Site contains an "historical resource" as defined under CEQA. Since the draft ROSE Update is a policy document that affects recreational and open spaces throughout

²⁹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

³⁰ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

the City, the City as a whole, Sharp Park in the City of Pacifica, and Camp Mather in Groveland in Tuolumne County are considered to be the "Project Site." This Initial Study discusses the presence of identified and potential historical architectural resources related to the City's recreational and open spaces. The second step of the historical resource analysis is to determine whether the project could cause substantial adverse changes to historical resources. A substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of the historical resource would be materially impaired. Thus, this Initial Study discusses potential impacts of the draft ROSE Update policies to historical resources located within the Project Site.

There are 220 parks, open spaces and recreational facilities located throughout the City comprising over 5,800 acres. A number of these spaces and facilities have been identified, in whole or in part, as historical architectural resources in previous evaluations. These identified resources are listed in or have been found eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR), designated San Francisco Planning Code Articles 10 and 11 properties, or listed in local adopted registers and surveys (e.g., the *Here Today* survey, adopted as a local register by the Board of Supervisors in 1970). The list of resources within the City's parks, open spaces and recreational facilities includes buildings, structures, objects, sites, historic districts and cultural landscapes.³¹

To illustrate the types of historical resources within the City's recreation and open spaces, Table 4, below, lists the more prominent identified resources.

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³¹ As defined by the National Park Service, a "cultural landscape" is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or that exhibits other cultural or aesthetic values. There are four general types of cultural landscapes, not mutually exclusive: historic sites, historic designated landscapes, historic vernacular landscapes, and ethnographic landscapes.

Table 4: Listed or Eligible Historic Properties

National Register (listed or eligible) ³²	California Register (listed or eligible)	Articles 10 & 11 (listed)
Aquatic Park Historic District	Sharp Park Golf Course (Pacifica)	Alamo Square Historic District
Civic Center Historic District	Lincoln Park Legion of Honor	Civic Center Historic District
Embarcadero Historic District	Duboce Park	Cottage Row Park
Fort Point National Historic Site	Stern Grove	Hallidie Plaza
Golden Gate Park	Glen Canyon Park Recreation Building	Noe Valley Library
Hyde Street Pier		Olympic Country Club, 524 Post Street
Palace of Fine Arts		Sunnyside Conservatory
Presidio of San Francisco		Union Square
San Francisco Ferry Building		Washington Square
Fort Mason		Duboce Park Historic District
Pier 70		

Source: San Francisco Planning Department, 2011.

As noted above, properties formally listed in or found eligible for listing in the National or California Registers and properties listed in Articles 10 and 11 of the Code are considered historical resources for the purposes of CEQA analysis.

Golden Gate Park was added to the Historic Preservation Commission's Landmark Designation Work Program in 2010. In addition to the previously identified historic resources within the City's recreational and open spaces, there are also many buildings, structures, objects, sites, historic districts and cultural landscapes over 50 years in age that have not yet been evaluated for historical significance. These properties would require further consultation and project-specific environmental review if future projects proposed their alteration or demolition. The majority of recreational and open spaces – and the buildings, structures, objects, and sites located within them – fall within this unevaluated category of properties and are identified under the Planning Department's CEQA Review Procedures for Historic Resources and in its Parcel Information Database as "Category B" – properties (Properties Requiring Further Consultation and Review).

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³² These structures and districts appear from the California Historic Resources Inventory System (CHRIS) database as having a National Register Status Code (NRSC) or 1 or 2 and are, therefore, automatically included in the California Register.

Impact CP-1: The draft ROSE Update would not have a significant impact on historical architectural resources and cultural landscapes. (Less than Significant)

The draft ROSE Update's objectives and policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provide a high level of service to their users with numerous amenities. About one-half of the objectives and policies in the draft ROSE Update correlate to existing policies and objectives in the current ROSE, meaning that the draft ROSE Update policies are substantially similar to those in the existing ROSE.

As explained in the Open Space Framework and in the draft ROSE Update, the City would continue policies from the existing ROSE to preserve existing parks and open spaces as well as to develop new spaces over time in high needs areas consistent with existing need, population growth, overall demand and other socio-economic factors. Thus, the intent of the draft ROSE Update is to preserve parks and recreational facilities rather than eliminate or reduce them. Furthermore, in instances where new objectives and policies are introduced, these typically relate to sustainability and environmental stewardship (Objectives 4 and 5), as well as funding and management (Objective 6). Implementation of the objectives and policies of the draft ROSE Update would not result in adverse impacts to historical resources since they would not recommend the demolition or reduction of recreational and open spaces and to do not directly involve material changes to buildings, structures, or landscapes.

In some instances, the draft ROSE Update policies inherently align with the Secretary of the Interior *Standards for the Treatment of Historic Resources* and the NPS's *Guidelines for Rehabilitating Cultural Landscapes*. For example, Policy 1.3 calls for preserving "existing open space by restricting its conversion to other uses and limiting encroachment from other uses." This policy is similar to existing ROSE Policy 2.2, "Preserve existing open space." As discussed under Impacts LU-1 and LU-3 of this Initial Study, this policy would ensure that the character of parks and their surrounding areas are not adversely altered, divided or disrupted through conversion to another land use and sets forth procedures and criteria for reviewing potential proposals for new or expanded buildings and uses in parks. In addition to the Planning Department's procedures already in place for the review of historic resources, the above policy ensures an additional layer of protection for known and potential historic resources by preserving existing open spaces that may qualify for listing on the California Register as a cultural landscape or as a contributing landscape feature to a historic property or district.

More specifically related to the protection and preservation of historic resources, the draft ROSE Update includes Policy 1.6½ "Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape." Golden Gate Park is a historic district and cultural landscape listed on the National Register and it contains several Article 10 Landmarks.³³ The park is historically significant under Criterion A/1 (Events) and Criterion C/3 (Architecture) in the areas of landscape architecture and social history as "one of the pioneering examples of the

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Nelson, Douglas. NPS Form 10-900, Golden Gate Park. July 2003, revised June 2004. On file for review at the Planning Department, National Register Historic District Files, 1650 Mission Street, Suite 400, San Francisco.

large urban park in the United States" and as "the first naturalistic landscape park in the west." The park contains 133 contributing resources and 56 non-contributing resources. The above policy would help ensure the historic characteristics of Golden Gate Park. Implementation of the draft ROSE Update would not result in adverse physical impacts to historical resources in Golden Gate Park.

The draft ROSE Update includes Policy 1.12, "Preserve historic and culturally significant landscapes, sites, structures, buildings and objects;" and Policy 1.13, "Preserve and protect character-defining features of historic resources in City parks, when it is necessary to make alterations to accommodate new needs or uses." These policies, which primarily reflect the ongoing review mechanism implemented by the Planning Department, would not result in any significant impacts to historical resources.

In addition to the policies cited above, which explicitly include preservation principles in their statements, the draft ROSE Update and accompanying Open Space Framework also include policies that may indirectly result in material changes to recreational and open spaces and the buildings, structures, objects, and sites located therein. In such instances, the Planning Department's CEQA Review Procedures for Historic Resources would require further consultation and project-specific environmental review. In accordance with the Department's CEQA review policy, any project that involves the exterior alteration or demolition of a property over 50 years of age is required to undergo environmental review that includes an evaluation of the properties' historical significance and, if a resource is present, an analysis of project impacts. Therefore, any future projects related to the implementation of the draft ROSE Update policies that include the alteration, demolition, or construction of buildings, recreational spaces, or open spaces would be subject to project-specific environmental review that evaluates potential impacts to historic resources. Examples of draft ROSE Update policies that would potentially result in projects that require future environmental review are discussed below:

- Policy 1.5: "Prioritize the activation of McLaren Park, Ocean Beach, the Blue Greenway and other underutilized significant open spaces." This policy calls for the City to develop these large signature areas as multifunctional open spaces that serve a diverse set of users. Neither McLaren Park nor Ocean Beach have been previously evaluated for potential historical significance; however, some of the other signature open spaces identified on the map on the draft ROSE Update p. 24, such as the Ferry Building plaza and Hunters Point, contain identified historical architectural/structural resources. While many of the policy's directives pertain to programming of the spaces and would not result in material changes to the properties, others call for physical improvements to the spaces to increase user-friendliness and safety. These changes would not result in adverse impacts to historic resources since they would be maintaining the historic use and character of the spaces; however, such projects would trigger project-specific environmental review that evaluates potential impacts to historic resources.
- Policy 1.3: "Preserve existing open space by restricting its conversion to other uses and limiting encroachment from other uses, assuring no loss of quantity or quality of open space." In addition to limiting the development of non-recreational uses on existing park

land, this policy restates and amends existing criteria for the review of new or expanded recreational and cultural buildings. The policy acknowledges that the priority goal of retaining outdoor open spaces may not always be met when new recreational facilities are necessary and sets review criteria that are intended to balance these competing needs. While these criteria would reduce the impact of future projects to historic resources by restricting size and requiring the review of alternative sites, such projects would result in material changes to recreational and open spaces. Therefore, such projects would trigger project-specific environmental review that evaluates potential impacts to historic resources.

- Policy 2.4: "Support the development of signature public open spaces along the shoreline." According to the map on ROSE Update p. 24, "planned signature open spaces" are conceptually illustrated at the Ferry Building plaza and at Hunters Point, and "potential signature open spaces are proposed at China Basin and the Central Waterfront." All of these areas contain or are located near identified and potential historic resources. In addition, the policy lists multiple shoreline locations that have not yet been evaluated for historical significance. Improvements to these areas could include linking existing open spaces, completing the Bay Trail system in San Francisco, and the creation of parks and plazas with their associated landscape and hardscape features. Such projects would result in material changes to existing recreational and open spaces and would, therefore, trigger project-specific environmental review that evaluates potential impacts to historic resources.
- Policy 2.5: "Encourage the development of region-serving open spaces in opportunity areas: Treasure Island, Yerba Buena Island, Candlestick and Hunters Point Shipyard." These areas have recently undergone intensive environmental review for development projects unrelated to the draft ROSE Update. Each area contains identified historic resources and any recreation and open space projects related to those development plans were evaluated for potential impacts to historical resources during their independent review. Nevertheless, any new projects related to recreational and open space in these areas would trigger project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.
- Policy 2.6: "Support the development of civic-serving open spaces." This policy specifically addresses those open spaces that surround the Civic Center, which is designated as an Article 10 Historic District consisting of a principal aggregation of monumental buildings around a central open space, with additional buildings extending the principal axis at either end. There are eight major buildings, a group of secondary buildings, three unrealized building sites, and a large plaza within the historic district. The architectural features, formal plan composition and streetscape elements of district that should be preserved and strengthened are also identified in the Civic Center Plan, an Element of the City's General Plan, and in the Civic Center Urban Design Guidelines adopted by the Planning Commission pursuant to that plan. Any projects resulting from this policy must comply with these plans, guidelines, and Planning Code provisions in

- addition to undergoing project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.
- Policy 2.12: "Expand the Privately-owned Public Open Spaces (POPOS) requirement to new mixed-use development areas and ensure that spaces are truly accessible, usable and activated." The downtown area is rich in historical architectural/structural resources and includes a number of individually listed landmarks as well as Article 11 designated Significant Buildings and Conservation Districts. While some of the existing open spaces and parks in the downtown area have historical significance, such as Union Square which dates to 1850 and is part of the Kearny-Market-Mason-Sutter Conservation District, many of the open spaces are the result of Planning Code requirements adopted in the 1980s. Therefore, many of the downtown open spaces would not be considered to be historically significant due to their relatively recent history. Those spaces that have been determined to be historic resources would undergo separate environmental review as cited above. The remaining spaces primarily serve as a setting to surrounding historic resources. As such, the improvement of these spaces to ensure their continued use would not substantially change their existing character or the setting of historic resources that they abut. Therefore, the policy does not adversely affect historic resources.
- Policy 3.1: "Creatively develop existing publicly-owned rights-of-way and streets into open space." This policy encourages the reconfiguration and/or re-use of rights-of-way and streets within the City and would involve streetscape improvements such as bulbouts, crosswalk improvements, tree planting, pedestrian lighting, expansion of sidewalks and other landscape elements. In some cases, existing streetscape features may be considered to be individually historically significant or as contributing to the particular character of a historic district. Public right-of-ways also play an integral role in the interpretation and appreciation of individual historic buildings and structures by providing context and setting. Therefore, streetscape improvements should be analyzed for potential effects to the character of individual historic buildings or structures. In keeping with the procedures described above, such projects would be subject to project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.
- Policy 3.3: "Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering historic water courses to improve stormwater management." Similar to the discussion under Policy 3.1 above, existing trails may be considered to be individually historically significant or as contributing to the particular character of a historic district, such as those located within the Presidio or Golden Gate Park. While the physical effects of extending these trails systems are likely to be substantially less in comparison to the streets and rights-of-way improvements, there remains a possibility that historical architectural/structural resources could be affected by such future projects. For example, the conceptual Crosstown Trail shown on ROSE Update p. 36 would eventually span from Candlestick Point northeast across McLaren Park, Bernal Hill, Diamond Heights/Twin Peaks, connecting with the Ridge Trail through Buena Vista Park to Golden Gate Park and then to the Presidio. The

majority of the parks and landscapes that the Crosstown Trail would connect are either identified or potential historic resources. Therefore, any new projects related to the implementation of this policy would be subject to project-specific environmental review that evaluates potential impacts to historical architectural/structural resources.

In sum, for the reasons stated above the objectives and policies in the draft ROSE Update would not result in adverse impacts to historical resources since they do not recommend the demolition or reduction of recreational and open spaces and do not directly propose material changes to buildings, structures, objects, sites, historic districts and cultural landscapes. As previously stated, any implementation projects resulting from the draft ROSE Update would be subject to project-specific environmental review. As such, the draft ROSE policies and objectives are considered to have a less-than-significant effect on historical resources, both individually and cumulatively.

Impact CP-2: Implementation of the draft ROSE Update would not adversely affect legallysignificant archeological resources. (Less than Significant)

CEQA requires that the effects of a project on an archaeological resource shall be taken into consideration. CEQA recognizes two different categories of significant archeological resources: "unique" archeological resources (CEQA Sect. 21083.2) and archeological resources that qualify as "historical resources" under CEQA (CEQA and Guidelines. 21084.1, 15064.5). Under CEQA, evaluation of an archeological resource as an "historical resource" is privileged over the evaluation of the resource as a "unique archaeological resource," in that, CEQA requires that "when a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource" (CEQA Sect. 15064.5 (c)(1), that is, if the archaeological resource meets one or more of the criteria for listing on the CRHR (Public Resource Code §5024.1, Title 14 CCR, Section 4852):

The resource:

- is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1);
- is associated with the lives of persons important in our past (Criterion 2);
- embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values (Criterion 3); or
- has yielded, or may be likely to yield, information important in prehistory or history (Criterion 4).

To be eligible for listing to the CRHR under Criteria 1, 2, or 3, an archaeological site must contain artifact assemblages, features, or stratigraphic relationships associated with important events, or important persons, or exemplary of a type, period, or method of construction (CEQA Guidelines §15064.5(a)(1) and (3) and (c)(1) and (2)). To be eligible under Criterion 4, an archaeological site need only show the potential to yield important information (U.S. Department of the Interior 1986). An archaeological resource that qualifies as a "historical resource" under CEQA, generally,

qualifies for listing under Criterion 4 of the CRHR (CEQA Guidelines §15064.5 (a)(3)(D). An archaeological resource may qualify for listing under Criterion 4 when it can be demonstrated that the resource has the potential to significantly contribute to questions of scientific/historical importance.³⁴ Thus, the adoption of the draft ROSE Update would result in adverse effect to a legally-significant archeological resource, if it would cause directly or indirectly as substantial diminution in the informational/research value of the resource. Examples of actions that can directly or indirectly adversely affect archeological deposits are soils excavation, grading or recontouring of slopes, installation of foundational supports, remediation of hazardous soils, and injection of agents to stabilize subsurface soils. Where archeological deposits are located near or at the existing surface, minor soils disturbing activities may have the potential to substantially adversely affect an archeological resource.

The City has a rich, complex, and an unusually well-preserved archeological record that extends back to nearly 6,000 years before the present (B.P.). Our knowledge of all of the significant historical periods of pre-Modern San Francisco – the Hispanic Period (1776-1846), Yerba Buena Period (1835-1848), the Early and Late Gold Rush Periods (1848-1860), the Victorian Period (1860-1906) – continues to be expanded by the discovery and research of archeological sites associated with these periods.

Archeological resources in San Francisco can be vertically found from as deep as 75 feet below existing grade (CA-SFR-28) to as shallow as at the existing ground surface (Lake Merced Midden). An archeological resource can be as massive in scale as a buried Gold Rush period storeship (the General Harrison), as complex as representing occupations of several different peoples over a period of 3,000 years CA-SFR-4), as fragile and disperse as a prehistoric lithic scatter site (CA-SFR-113), or as small as a single artifact (CA-SFR-25). Since human occupation and use has occurred throughout the entire northern San Francisco peninsula extending back to geologic/climatic eras when the bay and ocean shorelines were considerably beyond and lower than their current alignments, the archeological record lies, potentially, throughout the City.

Although far from all extant archeological sites have been documented in the City, many archeological sites have been documented in public parks and open spaces, for example: Golden Gate Park, Lincoln Park, Lake Merced Park, the Presidio, Dolores Park, Glen Canyon Park, Ocean Beach, Fort Mason, Potrero del sol Park, U.N. Plaza, Justin Hermann Plaza, Portsmouth Square, etc. Archeological resources documented with the City's parks and open spaces range from buried Gold Rush period storeships (the William Grey), remains of the 1894 Midwinter Fair, remains of the first and second Presidio, two municipal and two Jewish cemeteries, and many prehistoric sites. Two characteristics of the City's parks and open spaces – their locational desirability and their comparatively low intensity of improvement – may be responsible for a stronger and better preserved archeological record, in general, within the City's parks and open spaces than other areas, since the desirability of the same locations for occupation and use may have been as true in prehistory as at present. Further, comparatively low intensity of development within the City's parks and open spaces would result in comparatively better

³⁴ State of California Office of Historic Preservation, *Preservation Planning Bulletin* No. 5.

preserved archeological deposits than areas of more intense infrastructural and structural development.

Implementation of the objectives and policies of the draft ROSE Update would not result in any adverse effects to archeological resources since they would not directly involve any material change to the physical environment, including subsurface soils that may contain archeological resources. Thus, the potential of the draft ROSE Update to result in any direct effect to archeological resources is less than significant. Implementation of the draft ROSE Update may indirectly result in soils disturbance of subsurface soils containing legally-significant (CRHR-eligible) archeological resources, through implementation of landscape or streetscape and improvements, construction of new parks or recreational facilities or enhanced maintenance activities. Any implementation projects resulting from the draft ROSE Update would be subject to project-specific environmental review, including preliminary archeology review by the Environmental Planning division archeologist, who will evaluate the potential of the project to adversely affect legally-significant archeological resources. Thus, implementation of the draft ROSE Update would result in a less-than-significant effect on archeological resources.

Impact CP-3: Implementation of the draft ROSE Update would not destroy a unique paleontological resource or site or unique geologic feature. (No Impact)

Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. Paleontological resources include vertebrate, invertebrate, and plant fossils or the trace or imprint of such fossils. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered nonrenewable resources because the organisms from which they derive no longer exist. Thus, once destroyed, a fossil can never be replaced. Ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities that could be implemented in the future could potentially damage or destroy paleontological resources that may be present below ground surface. As with archeological resources, paleontological resources are generally considered to be historical resources, as defined in Section 15064.5(a)(3)(D). Any implementation projects resulting from the draft ROSE Update will be subject to project-specific environmental review, including preliminary archeology and geological review by the Environmental Planning division staff, to evaluate the potential of the project to affect legally-significant archeological resources. Thus, implementation of the draft ROSE Update would result in a less than significant effect on paleontological resources.

Impact CP-4: The policies and objectives in the draft ROSE Update would not impact human remains. (No Impact)

Impacts on Native American burials are considered under Public Resources Code (PRC) Section 15064.5(d)(1). When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within a project site, the CEQA lead agency is required to work with the appropriate tribal entity, as identified by the California Native American Heritage Commission (NAHC). The lead agency may develop an agreement with the appropriate tribal entity for testing or disposing of, with appropriate dignity, the human remains and any items

associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than the dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains.

Subsequent projects that may be implemented in the context of the ROSE would be required to comply with applicable state laws, including immediate notification of the City Coroner should human remains and associated or unassociated funerary objects be discovered during any soils-disturbing activities. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC Section 5097.98). Because implementation of the draft ROSE Update does not include any specific projects, it would not directly disturb Native American burials or any human remains, and would therefore have no impact on human remains.

Impact C-CP: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not result in cumulative impacts to cultural resources. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts cultural or palentological resources. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,³⁵ the 2012 Parks Bond,³⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant impacts related to cultural or paleontological resources and would not result in a cumulatively considerable contribution to cultural or paleontological impacts. For the reasons discussed above, the proposed project's impacts related to cultural or paleontological resources, both individually and cumulatively, would be less than significant.

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³⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

³⁶ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Тор	oics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
5.	TRANSPORTATION AND CIRCULATION—Would the project:					
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?					
b)	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion man agement agency for designated roads or highways?					
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?					
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?					
e)	Result in inadequate emergency access?					
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?					

Less Than

Below is a list of significance criteria used by the San Francisco Planning Department to assess whether a proposed project would result in significant impacts to the transportation network. These criteria are organized by transportation mode to facilitate the transportation impact analysis; however, the transportation significance thresholds are essentially the same as the ones presented above in the checklist.

The operational impact on signalized intersections is considered significant when project-related traffic causes the intersection level of service (LOS) to deteriorate from LOS D or better to LOS E or F, or from LOS E to LOS F. The project may result in significant adverse impacts at intersections that operate at LOS E or F under existing conditions depending upon the magnitude of the project's contribution to the worsening of the average delay per vehicle. In addition, the project would have a significant adverse impact if it would cause major traffic hazards or contribute considerably to cumulative traffic increases that would cause deterioration in levels of service to unacceptable levels.

- The project would have a significant effect on the environment if it would cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service; or cause a substantial increase in delays or operating costs such that significant adverse impacts in transit service levels could result. With the Muni and regional transit screenlines analyses, the project would have a significant effect on the transit provider if project-related transit trips would cause the capacity utilization standard to be exceeded during the peak hour.
- The project would have a significant effect on the environment if it would result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the site and adjoining areas.
- The project would have a significant effect on the environment if it would create
 potentially hazardous conditions for bicyclists or otherwise substantially interfere with
 bicycle accessibility to the site and adjoining areas.
- A project would have a significant effect on the environment if it would result in a loading demand during the peak hour of loading activities that could not be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and created potentially hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians.
- The project would have a significant effect on the environment if it would result in inadequate emergency access.
- Construction-related impacts generally would not be considered significant due to their temporary and limited duration.

Approach to Analysis

This section addresses the potential transportation effects related to implementation of the draft ROSE Update. The draft ROSE Update consists of objectives and policies related to the operation and maintenance of the existing 220 parks, open spaces and recreation facilities which range in location from residential to commercial areas throughout the City; and provides guidance for the potential location of new facilities, primarily through the implementation of other Plan areas, such as Hunter's Point Candlestick Shipyard open space improvements or improvements in public rights-of-way or property to better connect existing facilities.

The ROSE, as a policy document, does not include specific recreation or open space projects, and as such would not generate foreseeable new person trips. Therefore, the analysis of this policy document focuses on how the general goals and objectives of the draft ROSE Update correspond with other City General Plan transportation policies related to traffic, transit, pedestrian, bicycle and emergency vehicle access. The policy analysis therefore, does not include level of service (LOS), transit demand, etc. analyses that would be typical for a development project that would

generate person trips. Similarly, since no specific projects are included, an analysis of construction-related transportation effects is not feasible or warranted. As a policy document, the draft ROSE Update would not alter or affect air traffic patterns. This section does provide a comparison of the ROSE objectives and policies with City parking policies for informational purposes.

Transportation Setting

Existing Roadway Network

The Transportation Element of the General Plan classifies roadways by type within the City ranging from Freeways, Major and Secondary Arterials to Collector and Local Streets. The General Plan further identifies Primary Transit, Transit Preferential Streets and Citywide or Neighborhood Pedestrian Network Streets. Due to their varied location throughout the City, existing parks, recreational facilities and open space areas can be accessed by a variety of roadway types.

Transit Network

Local transit service throughout the City is provided by Muni, the transit division of the San Francisco Municipal Transportation Authority (SFMTA). Muni operates a fleet of buses, cable cars and light rail routes throughout the City providing both local service and connections to regional transit providers serving the North Bay, East Bay, South Bay and the Peninsula. Golden Gate Transit buses and ferries provide service to the North Bay; Bay Area Rapid Transit (BART), the Water Emergency Transportation Authority (WETA) and Alameda-Contra Costa Transit (AC Transit) District to the East Bay; and Caltrain and San Mateo County Transit District (SamTrans) to the South Bay and Peninsula. Muni routes operate seven days a week, primarily between 6 a.m. to midnight; schedules vary route-by-route, with some late night (Owl) service. Service frequencies range from three to 30 minutes depending on time of day and route, with the most frequent service provided during the weekday AM peak period (7 – 9 a.m.) and PM peak period (6 – 9 p.m.). Typical peak capacities for transit operations occur during the weekdays, in the inbound (to Downtown) direction in the mornings and in the outbound (away from Downtown) in the evenings. Muni also provides express lines which only operate in the peak period peak direction and additional event day service for recreational, sports, and civic events.

Bicycle Facilities

As indicated in the Transportation Element of the General Plan and the San Francisco Bicycle Plan, the City has a series of designated bike routes and facilities including Class I (separated bike paths), Class II (bike lanes), and Class III (signed but shared streets) facilities, which interconnect neighborhoods, attractions, and commute destinations throughout the City. Many of these facilities lead to or are located within parks, recreational and open space facilities, and include shared pathways with pedestrian traffic.

Pedestrian Facilities

Sidewalks are provided on most city streets on both sides, and are wider (up to 30 feet) on major pedestrian corridors (such as The Embarcadero). Most of the intersections with major pedestrian

activity are signalized with pedestrian signals and crosswalks, and the heaviest pedestrian activities tend to occur in or near tourist attractions and in downtown commercial areas. Pedestrian facilities in or near recreational and open space areas vary from sidewalks on one or both sides of streets to paved or unimproved pedestrian pathways separated from vehicle traffic. The City has several ongoing programs to enhance pedestrian safety and facilities including investing in 'safe routes' to schools, adding pedestrian amenities such curb bulb-outs and benches and calming traffic where desirable to improve pedestrian conditions.

Loading Facilities

Commercial loading facilities throughout the City are provided for corresponding land uses consistent with Section 152 of the Code, and as such recreational and open space areas generally are not required to provide loading spaces except with recreational facility buildings where loading would be provided based on location in the City and building size. Therefore, commercial loading facilities related to recreational or open space facilities include designated loading spaces, nearby on-street commercial loading parking spaces (including metered spaces), and on- and off-street parking spaces, when available.

On-street passenger loading throughout the City is designated by white curbs and tends to be located near tourist (e.g., hotel, event) locations and transit facilities (BART stations). Additionally, on- or off-street passenger loading areas may be provided in relation to specific land uses, such as schools. Passenger drop-off areas are limited in recreational and open space areas and tend to be shared with other nearby land uses, such as museums or tourist attractions.

Parking Conditions

On-street parking conditions throughout the City vary depending on location, from on-street metered parking to unlimited (except for street-sweeping maintenance hours) on-street parking. Similarly the availability of off-street parking, both private and public, vary by location with more facilities being provided in the Downtown or adjacent areas than other areas of the City, where on-street parking is more readily available. Parking conditions in or near recreational or open space facilities similarly vary from providing some to no off-street parking spaces to relying on on-street parking which includes metered, posted restricted hours, or unlimited on-street parking spaces.

Key Transportation Policies and Regulations

The following is a summary of City policies and regulations related to transportation that were considered in the analysis of the draft ROSE Update objectives and policies.

San Francisco Countywide Transportation Plan

The San Francisco County Transportation Authority (SFCTA) is the designated Congestion Management Agency for San Francisco. The SFCTA is responsible for preparing a long-range Countywide Transportation Plan, prioritizing transportation investment and developing and maintaining a computerized travel demand forecasting model and related databases.

San Francisco General Plan

The Transportation Element of the General Plan is composed of several sections including 1) General, 2) Regional Transportation, 3) Congestion Management, 4) Vehicle Circulation, 5) Transit, 6) Pedestrians, 7) Bicycles, 8) Citywide Parking and 9) Goods Movement. Each section consists of objectives and policies regarding a particular segment of the master transportation system.

San Francisco Municipal Code

The San Francisco Transportation, Planning, Police and Building Code of the Municipal Code all contain provisions and regulations for traffic devices, building and facility requirements, operation of vehicles, and vehicle trip reduction.

San Francisco Transit First Policy

The San Francisco City Charter (Section 16.102) includes the Transit First Policy, a set of principles which underscore the City's commitment that travel by transit, bicycle and foot be given priority over the private automobile. These principles are further emphasized in the goals and policies of the General Plan's Transportation Element.

San Francisco Transit Effectiveness Project

The Transit Effectiveness Project (TEP) presents a thorough review of San Francisco's public transit system, initiated by SFMTA in collaboration with the City Controller's Office. The TEP is aimed at improving reliability, reducing travel times, providing more frequent service and updating Muni bus routes and rail lines to better match current travel patterns. The TEP recommendations were unanimously endorsed for purposes of initiating environmental review by the SFMTA Board of Directors in October 2008. They include new routes and route extensions, more service on busy routes, and elimination or consolidation of certain routes or route segments. SFMTA recently published a TEP Implementation Strategy (April 5, 2011). The TEP Implementation Strategy anticipates that many of the service improvements would be implemented sometime between the end of Fiscal Year (FY) 2013 and FY 2015 and that the remainder of the service improvements would occur in FY 2016.³⁷

San Francisco Bicycle Plan

The San Francisco Bicycle Plan includes short-term and long-term planned improvements for bicycle facilities throughout the City and is currently being implemented by SFMTA. Bicycle improvements range from new bike lanes to better bicycle route signage, and are located throughout the City, generally along existing designated bicycle routes.

Better Streets Plan

The Better Streets Plan consists of a set of guidelines to make San Francisco streets more useable, attractive and accessible, to make them safer and more welcoming to pedestrians, to improve their ecological functioning, and to make them a more central point of civic life.

³⁷ SFMTA, Draft Transit Effectiveness Project Implementation Strategy, April 5, 2011, page 3-5.

WalkFirst Project

The WalkFirst project is an interdepartmental collaborative project with the goal to identify key walking streets throughout San Francisco and establish criteria to prioritize pedestrian improvements fostering pedestrian safety and walking conditions, encourage walking, and enhance pedestrian connections to key destinations. This project builds on the Better Streets Plan and coordinates with other efforts to improve the City's streets and transportation system.

SFPark

The SFPark Program, implemented by SFMTA, improves parking management of metered spaces through providing dynamic information to drivers and in some locations varies the cost of parking based on demand. The SFPark Program aims to reduce traffic congestion related to drivers searching for available on-street parking spaces.

SFGo

Also implemented by SFMTA, the SFGo program is a citywide traffic management system which enables SFMTA traffic engineers, through monitoring cameras to remotely alter traffic signal controllers in key locations to dynamically adjust intersection signal timing in response to observed congestion or traffic incidents. Engineers also have access to control electronic message boards to alert drivers to upcoming observed conditions. Sometime in the future, the SFGo control center will be combined with Muni Central Control, so that transit operations can better respond to real-time congestion and incidents.

RPD - Event Permits

As described in the Environmental Setting, RPD issues permits for use of city recreational facilities ranging in size from picnic reservations to large events and concerts. For events estimated to draw 10,000 or more attendees, the permit submittal must include an Event Transportation Management Plan, which includes methods to encourage the use of alternative modes (transit, walk, and bicycle). Such methods may include providing funding for additional event day transit service, requiring attendees to purchase event day transit tickets, providing a bicycle valet parking area, or publicizing alternative modes of travel with the event, pointing out nearest transit stops or routes.

Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT)

ISCOTT is a city staff committee that reviews applications for temporary street closures for special events, including street fairs, athletic events, and neighborhood block parties, at a meeting open to the public. ISCOTT is composed of representatives of several agencies including SFMTA, including Muni Operations Division, Public Works, Police, Fire, Public Health, and the Port.

Impact TR-1: The draft ROSE Update would not result in significant impacts related to traffic conditions or conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, or with an applicable congestion management program. (Less than Significant)

The draft ROSE Update objectives and policies would not generate foreseeable new person trips, including vehicle trips, and as such would not result in impacts to traffic conditions, operations

or hazards. The draft ROSE Update is a regulatory program, and its adoption would update the existing ROSE, through amended, and in some cases, new objectives and policies. No direct person trip generation would result from adopting these policies. As discussed in Population and Housing, p. 47 of this Initial Study, increases in residents and employment are projected to occur in San Francisco over a planning horizon of the next 20 years with or without implementation of the ROSE.

The ROSE Update objectives and policies, such as the following, serve to foster the better use of existing City recreational and open space facilities and continue to implement area-specific (e.g., Candlestick Point-Hunters Point Shipyard, Balboa Park Station Area Plan, etc.) open space plans that would in many ways be consistent with the City's Transit First Policy, and as policies would not substantially or adversely affect traffic conditions in the City. Traffic to and from recreational facilities and recreational events would continue as under existing conditions, including for large events, which require traffic management plans encouraging the use of alternative modes of transportation.

- Objective 3 "Improve access and connectivity to open space"
- Policy 3.1: "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4: "Encourage non-auto modes of transportation transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the ROSE policies, such as those indicated above, would foster the continuation of existing programs and projects, such as the "Sunday Streets" program throughout the City, the closure of a portion of Golden Gate Park to vehicle traffic on weekends, and pedestrian-related improvements to many sidewalks and rights-of-way throughout the City, consistent with the Better Streets Program. Where policies envision the expansion of recreation or open space, such as in underutilized City-owned space, in schoolyards, and in previously analyzed plan areas, such as Treasure Island, such expansion would predominantly serve the local neighborhood population and would not substantially alter traffic patterns in the area. Where policies and objectives envision the creative use of streets, including temporary or permanent closures of streets, travel lanes or parking spaces, such improvements would be analyzed against goals to maintain sufficient travel patterns to manage congestion throughout the City. Furthermore, any specific project implementation or program would be subject to project-level environmental review. Therefore, the objectives and policies of the ROSE update would not conflict with the General Plan's Transportation Element and would not significantly impact traffic conditions in the City. Thus, implementation of the draft ROSE Update policies would have a less-thansignificant impact on traffic.

Impact TR-2: The draft ROSE Update would not result in significant impacts related to transit demand or transit operation or substantially conflict with adopted policies, plans or programs regarding public transit, or otherwise decrease transit performance or safety. (Less than Significant)

As discussed under TR-1 above, the draft ROSE Update objectives and policies, would not generate new person trips, including transit trips, and as such would not result in impacts to transit demand or substantially alter transit operations.

Generally recreational and open space facilities are well-served by transit with one or more transit routes within walking distance. Transit use related to existing recreational facilities or events generally occurs throughout the day and on weekends (not peak-dependent) and therefore generally adds riders to predominantly off-peak transit operating conditions. As indicated above, for large events Muni may provide additional transit service to aid in movement of event-goers/attendees. The draft ROSE Update objectives and policies, such as the following, would serve to foster the better use of existing City recreational and open space facilities and continue to implement area-specific (such as Candlestick Point-Hunters Point Shipyard) open space plans, would not conflict with the City's Transit First Policy, and as policies, would not substantially or adversely affect transit conditions in the City.

- Objective 3 "Improve access and connectivity to open space"
- Policy 3.1 "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4 "Encourage non-auto modes of transportation transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the draft ROSE Update policies and implementation actions, such as those indicated above, would foster the promotion of transit use to recreational facilities and open space. Such local transit service expansion would serve to increase the efficient use of transit without substantially affecting peak hour transit service. Similarly the continued encouragement and provision of transit use that occurs in the planning of large events, including additional service, limits the intermittent capacity effects on regularly scheduled transit operations. Although boarding times for bicyclists on transit is slightly higher, encouraging the use of bicycles on buses with bike racks would generally foster local service use and would not substantially affect peak hour transit operating conditions. As such, the objectives and policies of the draft ROSE Update would be consistent with City's Transportation Element, planned TEP service improvements and 'Transit First' transportation policies to encourage alternate modes of travel including transit, including to and from City parks and open space. The ROSE Update policies would not substantially or adversely affect transit conditions in the City.

Impact TR-3: The draft ROSE Update would not result in significant impacts related to bicycles or bicycle facilities or substantially conflict with adopted policies, plans or programs regarding bicycle facilities or otherwise decrease the performance or safety of such features. (Less than Significant)

As discussed above, the draft ROSE Update objectives and policies would not directly generate foreseeable new person trips and as such would not result in impacts to bicycle facilities. However, through implementation of the draft ROSE Update's policies, in conjunction with improvements set forth in the Bicycle Plan, a potential exists to shift some of the forecasted

growth from single-occupancy vehicles to bicycle, transit or other modes. Existing bicycle facilities in or near recreational facilities would continue to be utilized and implementation of any planned short- or long-term improvements contained in the San Francisco Bicycle Plan would not conflict with the policies or objectives in the ROSE Update that may be implemented.

The draft ROSE Update objectives and policies, such as the following, would serve to foster the better use of existing City recreational and open space facilities and continue to implement areaspecific (such as the Mission Area Plan) open space plans, encouraging the use of alternate modes over private vehicles and as policies would not substantially affect bicycle conditions in the City.

- Objective 3 "Improve access and connectivity to open space"
- Policy 3.1 "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4 "Encourage non-auto modes of transportation transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the draft ROSE Update policies, such as those indicated above, examine ways to improve bicycle facilities and further promote the use of bicycles in the City, including those connecting to recreational facilities and open space. Such expansion in the use of local or regionally connecting bicycle routes and paths would not substantially affect these facilities or their capacity. Furthermore, maintaining existing or implementing planned bicycle facilities in previously analyzed Plan areas, would continue to foster bicycle use throughout the City. Following study and recommendation, any specific project implementation or program would be subject to project-level review. The objectives and policies of the draft ROSE Update would neither create potentially hazardous conditions for bicyclists, nor otherwise substantially interfere with bicycle accessibility to parks or adjoining areas. The draft ROSE Update would therefore not conflict with City's Transportation Element and transportation policies to encourage alternate modes of travel including bicycles, including to and from City parks and open space, and would not significantly impact bicycle conditions in the City.

Impact TR-4: The draft ROSE Update would not result in significant adverse effects related to pedestrians or pedestrian facilities or substantially conflict with adopted policies, plans or programs regarding pedestrian facilities or otherwise decrease the performance or safety of such features. (Less than Significant)

As discussed above, the draft ROSE Update objectives and policies would not generate new person trips, including pedestrian trips, and as such would not result in impacts to pedestrian facilities. The draft ROSE Update objectives and policies, such as the following, would serve to foster the better use of existing City recreational and open space facilities and continue to implement area-specific (e.g., Market and Octavia) open space plans, in many ways that would be consistent with the City's Transit First Policy, encouraging improvements to pedestrian facilities and as policies would not substantially affect pedestrian conditions in the City.

- Policy 1.6: "Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape."
- Policy 3.3: "Develop and enhance the City's recreational trail system, linking to the regional hiking and biking trail system and considering historic water courses to improve stormwater management."

Many of the draft ROSE Update policies, such as those indicated above, call for examining ways to further promote improvements to pedestrian facilities both within parks and open space; examining creative ways to interconnect existing open space and park facilities; and for investigating opportunities to better use underutilized public space and public rights-of-way to foster pedestrian facilities. Such expansion in the use of pedestrian facilities in or outside of parks and recreation areas would not substantially affect these or surrounding pedestrian facilities or their capacity. Furthermore, maintaining existing or implementing planned pedestrian improvements in previously analyzed Plan areas, in conjunction with the design typologies in the adopted Better Streets Plan would further foster pedestrian use, as well as improving connections to other modes of travel, such as transit. Following study and recommendation, any specific project implementation or program would be subject to project-level environmental review. The objectives and policies of the draft ROSE Update would not be expected to result in substantial overcrowding on public sidewalks, create potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to parks, recreational facilities and adjoining areas. The draft ROSE Update would not conflict with the City's Transportation Element and policies to encourage alternate modes of travel including pedestrian travel to and from City parks and open space, and as policies would not significantly impact pedestrian conditions.

Impact TR-5: The policies and objectives in the draft ROSE Update would not result loading conflicts. (No Impact)

The draft ROSE Update does not include any policies that pertain to loading. While on- or off-street passenger loading areas may be proposed or required in relation to specific land uses, such as recreational facilities, future proposals would require project-specific review to determine loading demand and to evaluate the potential for conflicts associated with on- or off-street loading. Because the draft ROSE Update contains no policies related to loading, its implementation would not expected to create potentially hazardous conditions or significant delays affecting traffic, transit, bicycles or pedestrians.

Impact TR-6: The policies and objectives in the draft ROSE Update would not result inadequate emergency access. (Less than Significant)

The ROSE update objectives and policies would serve to foster the better use of existing City recreational and open space facilities and as such would not affect existing emergency access to recreational or open space facilities. Although some ROSE update policies and objectives would encourage the reduction of private vehicle use, in some cases through the reduction of non-essential roadways or in exploring further temporary or permanent changes to public rights-of-way, any such resulting recommendations which would alter vehicle access, including emergency access, would, similar to existing programs, be required to prioritize and provide

emergency access where needed. Additionally, some of the draft ROSE Update policies – and the Open Space Framework in general – call for "dynamic activation and flexible programming of open space" (Policy 1.1). Implementation of this policy could result in increased numbers of park users above existing conditions. The current ROSE contains a similar policy that calls for making "better use of existing facilities" (Policy 4.1). Although increases in attendees to special events could be an outcome of implementing the ROSE Update, its implementation would not conflict with or alter existing requirements or conditions for temporary street closures. Conditions that call for "a continuous passageway in the roadway at least 14 feet in width shall be maintained at all times during the period of such use or occupancy for the use of emergency vehicles" or others may be required as conditions of permits for RPD or other types of events.

Following study and recommendation, any specific project implementation or program would be subject to project-level review, including the examination of any alteration of vehicle access as part of ISCOTT review, environmental review or both. As such, the draft ROSE Update objectives and policies would not result in inadequate emergency access.

Impact C-TR: Implementation of the draft ROSE Update, in combination of past, present, and reasonably foreseeable future projects, would not result in substantial cumulative transportation impacts. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant transporation impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,³⁹ the 2012 Parks Bond,⁴⁰ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would not result in transportation-related impacts and would not result in a cumulatively considerable contribution to transportation-related impacts. For the reasons discussed above, the proposed project's impacts related to transportation and circulation, both individually and cumulatively, would be less than significant.

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³⁸ Temporary Street Closure application, SFMTA, Division of Sustainable Streets, accessible online at http://www.sfmta.com/cms/vclos/strclos.htm

³⁹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

⁴⁰ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Parking Conditions

Public Resources Code Section 21099(d), effective January 1, 2014, provides that, "aesthetics and parking impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment." Accordingly, aesthetics and parking are no longer to be considered in determining if a project has the potential to result in significant environmental effects for projects that meet all of the following three criteria:

- a) The project is in a transit priority area;
- b) The project is on an infill site; and
- c) The project is residential, mixed-use residential, or an employment center.

Implementation of the draft ROSE Update would not meet the above criteria. In addition, future construction activities that may result from the draft ROSE Update would not meet criterion c) above. San Francisco does not consider parking supply as part of the permanent physical environment and therefore, does not consider changes in parking conditions to be environmental impacts as defined by CEQA. The San Francisco Planning Department acknowledges, however, that parking conditions may be of interest to the public and the decision makers. Therefore, this report presents a parking analysis for information purposes.

Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. While parking conditions change over time, a substantial shortfall in parking caused by a project that creates hazardous conditions or significant delays to traffic, transit, bicycles or pedestrians could adversely affect the physical environment. Whether a shortfall in parking creates such conditions will depend on the magnitude of the shortfall and the ability of drivers to change travel patterns or switch to other travel modes. If a substantial shortfall in parking caused by a project creates hazardous conditions or significant delays in travel, such a condition could also result in secondary physical environmental impacts (e.g., air quality or noise impacts caused by congestion), depending on the project and its setting.

The absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service or other modes (walking and biking), would be in keeping with the City's "Transit First" policy and numerous San Francisco General Plan Policies, including those in the Transportation Element. The City's Transit First Policy, established in the City's Charter Article 8A, Section 8A.115, provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation."

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. The secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area, and thus choose to reach their destination by other modes (i.e. walking, biking, transit, taxi). If this occurs, any secondary environmental impacts that may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, would reasonably address potential secondary effects.

Parking generally is not required for recreational and open spaces, except in relation to the provision of arts activities in buildings, stadiums, or auditorium-type uses. As indicated under the Setting, off-street parking is provided at some recreational facilities, while others rely on onstreet metered or hourly-restricted parking spaces. In three instances, parking garages are located directly underneath RPD facilities: at the Music Concourse in Golden Gate Park; under Union Square; and beneath United Nations Plaza.

The draft ROSE Update objectives and policies, such as those listed below, would not substantially affect existing parking conditions in or near existing adjacent recreational facilities throughout the City. The draft ROSE Update objectives and policies, such as the following, do include measures to reduce automobile traffic in public open spaces and reuse rights-of-way, including parking spaces, to improve pedestrian conditions, and such policies would be consistent with the City's Transit First Policy.

- Policy 3.1: "Creatively develop existing publicly-owned right-of-ways and streets into open space."
- Policy 3.4: "Encourage non-auto modes of transportation transit, bicycle and pedestrian access—to and from open spaces while reducing automobile traffic and parking in public open spaces."

Many of the draft ROSE Update policies, such as those indicated above, foster the continuation of existing programs and projects, such as the City's "Pavement to Parks" and "Parklets" programs which convert city street rights-of-way, including parking spaces to passive recreational and pedestrian-oriented uses. Such expansions would not substantially alter existing parking conditions throughout the City, though they could contribute to a parking shortfall. Through encouraging the use of SFPark near recreational facilities would allow drivers to locate parking spaces more easily and help reduce traffic congestion related to the circling of vehicles looking for available parking.

In light of the above, implementation of the draft ROSE Update would not result in significant impacts with respect to parking.

Тор	oics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
6.	NOISE—Would the project:					
a)	Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?					
b)	Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?					
c)	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?					
d)	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?					
e)	For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?					
f)	For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?					
g)	Be substantially affected by existing noise levels?			\boxtimes		

Less Than

The City's parks, open spaces and recreational facilities are not within an airport land use plan area in the vicinity of private airstrips. Therefore, topics 6e and 6f are not applicable.

Impact NO-1: Implementation of the draft ROSE Update would not expose persons to noise levels in excess of standards established in the General Plan or noise ordinance. (No Impact)

Noise in San Francisco is regulated by the following state statutes and local ordinances:

Construction Noise: Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code), amended in November 2008. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA⁴¹ at a distance of 100 feet from the source. Impact tools (jackhammers,

⁴¹ Sound pressure is measured in decibels (dB), with zero dB corresponding roughly to the threshold of human hearing, and 120 dB to 140 dB corresponding to the threshold of pain. Because sound pressure can vary by over one trillion times within the range of human hearing, a logarithmic loudness scale is used to keep sound intensity numbers at a convenient and manageable level. Owing to the variation in sensitivity of the human ear to various frequencies,

hoerammers, impact wrenches) must have both intake and exhaust mufflers as well as be equipped with acoustically attenuating shields or shrouds to the satisfaction of the Director of Public Works or the Director of Building Inspection. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by 5 dBA at the project property line, unless a special permit is authorized by the Director of Public Works or the Director of Building Inspection.

- **Fixed Sources**: The Noise Ordinance limits noise from sources defined as "any machine or device, music or entertainment or any combination of same" located on residential or commercial/industrial property to 5 dBA or 8 dBA, respectively, above the local "ambient"⁴² at any point outside of the property plane of a residential, commercial/industrial or public land use, respectively, containing the noise source. An additional low-frequency criterion applies to noise generated from a licensed Place of Entertainment, specifically that no associated noise or music shall exceed the low-frequency ambient noise level by more than 8 dBA. The Noise Ordinance limits noise from a "fixed source"⁴³ from causing the noise level measured inside any sleeping or living room in any dwelling unit located on residential property to 45 dBA between the hours of 10:00 p.m. to 7:00 a.m. or 55 dBA between the hours of 7:00 a.m. to 10:00 p.m. with windows open except where building ventilation is achieved through mechanical systems that allow windows to remain closed.
- Special Events: The RPD regulates amplified noise as part of overall permitting provisions required for special events. In general, amplified sound levels are restricted to 80 dBA; hours of sound amplification are tailored to the specifics of the event. Park Patrol retains the right to monitor and adjust sound levels during the event as required for the general public.
- Noise Insulation: California's Building Standards Code (Title 24 of the California Code of Regulations, which at the local level is enforced by DBI) establishes energy efficiency standards for residential and non-residential buildings. Title 24 also contains noise insulation standards that require new multi-unit and hotel/motel structures to meet an interior noise level not exceeding 45 dBA (L_{dn}) in any habitable room and, where such units are proposed in areas subject to outdoor noise levels in excess of than 60 dBA (L_{dn}), acoustical studies must be conducted that demonstrate that the design of the building will reduce interior noise to 45 dBA (L_{dn}) or less. If compliance with the required interior noise levels would only occur with windows closed, an alternative means of ventilation must be provided.

sound is "weighted" to emphasize frequencies to which the ear is more sensitive, via a method known as A-weighting and expressed in units of A-weighted decibels (dBA).

⁴² By definition, Noise Ordinance Section 2901(a) states "ambient" means the lowest sound level repeating itself during a minimum ten-minute period as measured with a type 1, precision sound level meter, set on slow response and A-weighting ... in no case shall the ambient be considered or determined to be (1) less than 35 dBA for interior residential noise, and (2) 45 dBA in all other locations."

⁴³ Noise Ordinance Section 2901(e) states "fixed source" means a machine or device capable of creating a noise level at the property upon which it is regularly located, including but not limited to: industrial and commercial process machinery and equipment, pumps, fans, air conditioning apparatus or refrigeration machines.

■ Land Use Compatibility: The San Francisco General Plan, which contains Land Use Compatibility Guidelines for Community Noise in its Environmental Protection Element.⁴⁴ These guidelines, which are similar to state guidelines promulgated by the Governor's Office of Planning and Research, indicate maximum acceptable noise levels for various newly developed land uses. For playgrounds and parks, the maximum "satisfactory" outside noise level is 70 dBA (Ldn), while in areas where noise levels range between 70-75 dBA, a detailed analysis of noise reduction requirements is typically necessary prior to final review and approval. Above noise levels of 75 dBA (Ldn), park and playground development is generally discouraged.⁴⁵

The policies in the draft ROSE Update would not directly increase ambient noise levels or result in construction noise effects. Parks, open spaces and recreational facilities that may be developed in the future in the context of the ROSE would be subject to the above regulations, and would be reviewed based on the specifics of the land use program or proposal for their potential to cause adverse noise effects. As such, the draft ROSE Update would have no impact on noise.

Impact NO-2: Implementation of the draft ROSE Update would not result in exposure of persons to generation of excessive groundborne vibration or groundborne noise levels. (No Impact)

As previously stated, no buildings or facilities would be constructed as part of the draft ROSE Update. Depending on the specific proposal, future open space improvements could require the use of heavy equipment for grading and excavation that may result in groundborne vibration effects. Because no open space improvements are proposed at this time, specific construction details associated with possible projects, including phasing, duration and types of construction equipment are not known. The implementation of the ROSE Update is long-term in nature and future projects would be subject to independent study and environmental review. Compliance with the Noise Ordinance is required by law and would serve to avoid significant adverse vibration impacts of the potential open space improvements on sensitive receptors such as residential uses. Therefore, vibration impacts associated with construction of open space improvements that may result from the draft ROSE Update would be less than significant.

Impact NO-3: Implementation of the draft ROSE Update would not cause a substantial permanent increase in ambient noise levels. (Less than Significant)

The General Plan's Environmental Protection Element includes the following objectives and policies related to noise: "Promote site planning, building orientation and design and interior layout that will lessen noise intrusion" (Policy 10.1); "Promote land uses that are compatible with various transportation noise levels" (Objective 11); and "Locate new noise-generating

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⁴⁴ San Francisco General Plan, Environmental Protection Element, Policy 11.1, San Francisco Planning Department, June 30, 2007, Figure 19 – Land Use Compatibility Chart for Community Noise. Accessible on-line at http://www.sf-planning.org/ftp/general_plan/I6_Environmental_Protection.htm. Available for public review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco.

⁴⁵ The residential guidelines are based on maintaining an interior noise level of 45 dBA, Ldn, as required by the California Noise Insulation Standards in Title 24, Part 2 of the California Code of Regulations.

development so that the noise impact is reduced" (Policy 11.3). Parks, open spaces and recreational facilities are not inherently noisy land uses. Operational noise would be related to typical park use activities, temporary public gatherings, sporting events and to some extent, vehicular traffic. With regard to events, RPD regulates amplified noise as part of overall permitting provisions required for the event in question. Permit conditions restrict amplified sound levels to 80 dBA and the Park Patrol retains the right to monitor and adjust sound levels during the event as required for the general public. Implementation of the draft ROSE Update would not alter or conflict with this standard permit condition.

In most of San Francisco, traffic makes the greatest contribution to ambient noise levels. The draft ROSE Update would not directly generate person trips and would not be expected to increase vehicle trips to parks and recreational facilities. It also includes Policy 3.4 which "Encourage[s] non-auto modes of transportation - transit, bicycle and pedestrian access-to and from open spaces while reducing automobile traffic and parking in public open spaces." This policy relates to the policies and objectives in the General Plan's Environmental Protection Element that call for "Reduc[ing] transportation-related noise" (Objective 9); "Impos[ing] traffic restrictions to reduce transportation noise" (Policy 9.2); and "Minimiz[ing] the impact of noise on affected areas" (Objective 10).

The draft ROSE Update's policies would not conflict with the policies in the General Plan's Environmental Protection Element that pertain to noise. Scientific studies indicate that an approximate doubling of traffic volumes would be necessary to produce an increase in ambient noise levels noticeable to most people.46 Thus, given that implementation of the draft ROSE Update would not directly generate person trips, it follows that it would also not cause traffic volumes to double and would not have a noticeable effect on ambient noise levels.

Impact C-NO-: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative noise impacts. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant noise impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,⁴⁷ the 2012 Parks Bond,⁴⁸ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

⁴⁶ San Francisco Better Streets Plan Mitigated Negative Declaration, p. 111. Available for review at the Planning Department, 1650 Mission Street, Suite 400 in Case File No. 2007.1238E.

⁴⁷ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

⁴⁸ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would not result in construction or operation noise impacts and would not be expected to contribute to any significant cumulative increases in ambient noise as a result of the project. For the reasons discussed above, the proposed project's impacts related to noise, both individually and cumulatively, would be less than significant.

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
7.	AIR QUALITY—Would the project:					
a)	Conflict with or obstruct implementation of the applicable air quality plan?					
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?					
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?					
d)	Expose sensitive receptors to substantial pollutant concentrations?					
e)	Create objectionable odors affecting a substantial number of people?					

Setting

Overview

The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (SFBAAB), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa Counties and portions of Sonoma and Solano Counties. The BAAQMD is responsible for attaining and maintaining air quality in the SFBAAB within federal and state air quality standards, as established by the federal Clean Air Act (CAA) and the California Clean Air Act (CCAA), respectively. Specifically, the BAAQMD has the responsibility to monitor ambient air pollutant levels throughout the SFBAAB and to develop and implement strategies to attain the applicable federal and state standards. The CAA and the CCAA require plans to be developed for areas that do not meet air quality standards, generally. The most recent air quality plan, the 2010 Clean Air Plan, was adopted by the BAAQMD on September 15, 2010. The 2010 Clean Air Plan updates the

Bay Area 2005 Ozone Strategy in accordance with the requirements of the CCAA to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gases in a single, integrated plan; and establish emission control measures to be adopted or implemented. The 2010 CAP contains the following primary goals:

- Attain air quality standards;
- Reduce population exposure and protect public health in the San Francisco Bay Area;
 and
- Reduce greenhouse gas emissions and protect the climate.

The 2010 Clean Air Plan represents the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of air quality plans.

Criteria Air Pollutants

In accordance with the state and federal CAAs, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. In general, the SFBAAB experiences low concentrations of most pollutants when compared to federal or state standards. The SFBAAB is designated as either in attainment⁴⁹ or unclassified for most criteria pollutants with the exception of ozone, PM_{2.5}, and PM₁₀, for which these pollutants are designated as non-attainment for either the state or federal standards. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.⁵⁰

Land use projects may contribute to regional criteria air pollutants during the construction and operational phases of a project. Table 5 identifies air quality significance thresholds followed by a discussion of each threshold. Projects that would result in criteria air pollutant emissions below these significance thresholds would not violate an air quality standard, contribute substantially to an air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants within the SFBAAB.

⁴⁹ "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant. "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant. "Unclassified" refers to regions where there is not enough data to determine the region's attainment status for a specified criteria air pollutant.

⁵⁰ Bay Area Air Quality Management District (BAAQMD), California Environmental Quality Act Air Quality Guidelines, May 2011, page 2-1.

Table 5: Criteria Air Pollutant Significance Thresholds

	Construction Thresholds	Operational Thresholds			
Pollutant	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Maximum Annual Emissions (tons/year)		
ROG	54	54	10		
NOx	54	54	10		
PM ₁₀	82 (exhaust)	82	15		
PM _{2.5}	54 (exhaust)	54	10		
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable			

Ozone Precursors. As discussed previously, the SFBAAB is currently designated as nonattainment for ozone and particulate matter. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NOx). The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. To ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors ROG and NOx, the offset emissions level is an annual average of 10 tons per year (or 54 pounds (lbs.) per day).⁵¹ These levels represent emissions by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Particulate Matter (PM10 and PM2.5).52 The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health based ambient air quality standards. For PM₁₀ and PM_{2.5}, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels at which a source is not expected to have an impact on air quality.⁵³ Although the regulations specified above apply to new or modified stationary sources, land use development projects result in ROG, NOx, PM10 and PM2.5 emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these

⁵¹ BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 17.

 $^{52 \}text{ PM}_{10}$ is often termed "coarse" particulate matter and is made of particulates that are 10 microns in diameter or smaller. $PM_{2.5}, termed\ "fine"\ particulate\ matter, is\ composed\ of\ particles\ that\ are\ 2.5\ microns\ or\ less\ in\ diameter.$

⁵³ BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 16.

thresholds would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ozone precursors or particulate matter. Due to the temporary nature of construction activities, only the average daily thresholds are applicable to construction phase emissions.

Fugitive Dust. Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust.⁵⁴ Individual measures have been shown to reduce fugitive dust by anywhere from 30 to 90 percent.⁵⁵ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.⁵⁶ The City's Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) requires a number of fugitive dust control measures to ensure that construction projects do not result in visible dust. The BMPs employed in compliance with the City's Construction Dust Control Ordinance is an effective strategy for controlling construction-related fugitive dust.

Local Health Risks and Hazards

In addition to criteria air pollutants, individual projects may emit toxic air contaminants (TACs). TACs collectively refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long-duration) and acute (i.e., severe but of short-term) adverse effects to human health, including carcinogenic effects. Human health effects of TACs include birth defects, neurological damage, cancer, and mortality. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, TACs do not have ambient air quality standards but are regulated by the BAAQMD using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated, and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.⁵⁷

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential

⁵⁴ Western Regional Air Partnership. 2006. WRAP Fugitive Dust Handbook. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.

⁵⁵ BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 27.

⁵⁶ BAAQMD, CEQA Air Quality Guidelines, May 2011.

⁵⁷ In general, a health risk assessment is required if the BAAQMD concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The applicant is then subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer as a result of exposure to one or more TACs.

receptors, their exposure time is greater than for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 350 days per year, for 70 years. Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups.

Exposures to fine particulate matter (PM_{2.5}) are strongly associated with mortality, respiratory diseases, and lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.⁵⁸ In addition to PM_{2.5}, diesel particulate matter (DPM) is also of concern. The California Air Resources Board (ARB) identified DPM as a TAC in 1998, primarily based on evidence demonstrating cancer effects in humans.⁵⁹ The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other TAC routinely measured in the region.

In an effort to identify areas of San Francisco most adversely affected by sources of TACs, San Francisco partnered with the BAAQMD to inventory and assess air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the "Air Pollutant Exposure Zone," were identified based on two health-protective criteria: (1) excess cancer risk from the contribution of emissions from all modeled sources greater than 100 per one million population, and/or (2) cumulative $PM_{2.5}$ concentrations greater than 10 micrograms per cubic meter ($\mu g/m^3$).

Excess Cancer Risk. The above 100 per one million persons (100 excess cancer risk) criteria is based on United State Environmental Protection Agency (USEPA) guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level. As described by the BAAQMD, the USEPA considers a cancer risk of 100 per million to be within the "acceptable" range of cancer risk. Furthermore, in the 1989 preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking, the USEPA states that it "...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling. Acceptable of the province of the province of the Bay Area based on BAAQMD regional modeling.

⁵⁸ SFDPH, Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review, May 2008.

⁵⁹ California Air Resources Board (ARB), Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998.

⁶⁰ BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 67.

⁶¹ 54 Federal Register 38044, September 14, 1989.

⁶² BAAQMD, Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance, October 2009, page 67.

Fine Particulate Matter. In April 2011, the USEPA published *Policy Assessment for the Particulate Matter Review of the National Ambient Air Quality Standards,* "Particulate Matter Policy Assessment." In this document, USEPA staff concludes that the current federal annual PM_{2.5} standard of 15 μg/m³ should be revised to a level within the range of 13 to 11 μg/m³, with evidence strongly supporting a standard within the range of 12 to 11 μg/m³. The Air Pollutant Exposure Zone for San Francisco is based on the health protective PM_{2.5} standard of 11 μg/m³, as supported by the USEPA's Particulate Matter Policy Assessment, although lowered to 10 μg/m³ to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

Land use projects within these Air Pollutant Exposure Zones require special consideration to determine whether the project's activities would expose sensitive receptors to substantial air pollutant concentrations or add emissions to areas already adversely affected by poor air quality.

Approach to Analysis

Implementation of the draft ROSE Update is a regulatory program and in and of itself would not directly involve construction activities that would generate fugitive dust, criteria air pollutants, or TACs. However, the draft ROSE Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities. Air quality impacts related to future construction associated with the draft ROSE Update would fall into two categories: short-term impacts from construction and long-term impacts from operation of recreational facilities.

These future construction activities, which would generate fugitive dust or result in emissions of air pollutants or TACs would be temporary and substantially similar to those implemented under the existing, 1986 ROSE. Furthermore, the Planning Department screens each of these future projects to determine whether the project exceeds the criteria established by the BAAQMD and whether the project site is located in an identified Air Pollutant Exposure Zone and ensures that any conditions imposed by the decision body on the project are satisfied through the mitigation monitoring and reporting program (MMRP).

Therefore, the following analysis clarifies that the implantation of the draft ROSE Update would not directly result in significant air quality impacts and addresses that potential construction and operational air quality impacts that may result from construction activities associated with the draft ROSE Update.

Impact AQ-1: Implementation of the draft ROSE Update would not violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. (Less than Significant)

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants. However, the draft Rose Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities.

Construction activities (short-term) typically result in emissions of ozone precursors and particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily a result of the combustion of fuel from on-road and off-road vehicles. However, ROGs are also emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. During the period of future construction that may result from the draft ROSE update, construction activities would have the potential to result in emissions of ozone precursors and particulate matter, as discussed below.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure. According to the ARB, reducing particulate matter PM2.5 concentrations to state and federal standards of 12 μ g/m³ in the San Francisco Bay Area would prevent between 200 and 1,300 premature deaths.

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Demolition, excavation, grading, and other construction activities can cause wind-blown dust that adds particulate matter to the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

In response, the San Francisco Board of Supervisors approved a series of amendments to the San Francisco Building and Health Codes generally referred hereto as the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008) with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of onsite workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI).

The Ordinance requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The Director of DBI may waive this requirement for activities on sites less than one half-acre that are unlikely to result in any visible wind-blown dust.

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⁶³ ARB, Methodology for Estimating Premature Deaths Associated with Long-term Exposure to Fine Airborne Particulate Matter in California, Staff Report, Table 4c, October 24, 2008.

In compliance with the Construction Dust Control Ordinance, the project sponsor and the contractor responsible for construction activities at the project site would be required to use the following practices to control construction dust on the site or other practices that result in equivalent dust control that are acceptable to the Director. Dust suppression activities may include watering all active construction areas sufficiently to prevent dust from becoming airborne; increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible. Contractors shall provide as much water as necessary to control dust (without creating run-off in any area of land clearing, and/or earth movement). During excavation and dirt-moving activities, contractors shall wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday. Inactive stockpiles (where no disturbance occurs for more than seven days) greater than 10 cubic yards or 500 square feet of excavated material, backfill material, import material, gravel, sand, road base, and soil shall be covered with a 10 mil (0.01 inch) polyethylene plastic (or equivalent) tarp, braced down, or use other equivalent soil stabilization techniques.

For projects over one half-acre, such as the proposed project, the Dust Control Ordinance requires that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health. DBI will not issue a building permit without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan, unless the Director waives the requirement. Interior-only tenant improvement projects that are over one-half acre in size that will not produce exterior visible dust are exempt from the site-specific Dust Control Plan requirement.

The site-specific Dust Control Plan would require the project sponsor to: submit a map to the Director of Public Health showing all sensitive receptors within 1,000 feet of the site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party to conduct inspections and keep a record of those inspections; establish shut-down conditions based on wind, soil migration, etc.; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing with a tarpaulin; enforce a 15 mph speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the day; install and utilize wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements.

Compliance with the regulations and procedures set forth by the San Francisco Dust Control Ordinance would ensure that potential dust-related air quality impacts that may result from the potential future construction associated with the implementation of the draft ROSE Update would be reduced to a level of insignificance.

Criteria Air Pollutants

As discussed above, construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment. To assist lead agencies in determining whether short-term construction-related air pollutant emissions require further analysis as to whether the project may exceed the criteria air pollutant significance thresholds shown in Table 1, above, the BAAQMD, in its CEQA Air Quality Guidelines (May 2011), developed screening criteria. If a proposed project meets the screening criteria, then construction of the proposed project would result in less-than-significant criteria air pollutant impacts. A project that exceeds the screening criteria may require a detailed air quality assessment to determine whether criteria air pollutant emissions would exceed significance thresholds. The CEQA Air Quality Guidelines note that the screening levels are generally representative of new development on greenfield⁶⁴ sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions.

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants. However, the draft Rose Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities. As discussed above, the Planning Department screens each of the future projects associated with the draft ROSE Update to determine whether the project's construction and operational criteria air pollutant emissions would be significant based on the criteria established by the BAAQMD. This screening and possibly detailed modeling would be required for specific projects that may be developed in parks or open spaces. Furthermore, these future construction activities would be subject to, and comply with, San Francisco's Clean Construction Ordinance (Ordinance No. 70-07), which requires public works projects to utilize equipment with engines that either meet or exceed Tier 2 standards for off-road engines or operates with the most effective ARB verified diesel emission control strategy. Each piece of construction-related equipment would result in between a 25 percent and 85 percent reduction in PM (which includes DPM) emissions from, as compared to pieces of equipment with uncontrolled or Tier 1 engines.⁶⁵ As such, implementation of the draft ROSE Update would not violate an air quality standard, would not contribute substantially to an existing or projected air quality violation, or would not result in a cumulatively considerable net increase in criteria air pollutants.

Impact AQ-2: Implementation of the draft ROSE Update would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants, nor would it introduce any new sensitive receptors (e.g.,

⁶⁴ A greenfield site refers to agricultural or forest land or an undeveloped site earmarked for commercial, residential, or industrial projects.

⁶⁵ The 25 percent reduction comes from comparing the ARB/USEPA PM emission standards for off-road engines between 25 hp and 50 hp for Tier 2 (0.45 (grams per brake horsepower per hour (g/bhp-hr)) and Tier 1 (0.60 g/bhp-hr). The 85 percent reduction comes from requiring a Level 3 ARB verified emission control strategy.

residents) to parks or open spaces owned by the SFRPD. However, the draft Rose Update includes policies that may indirectly result in construction activities, such as ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities.

Off-road equipment (which includes construction-related equipment) is a large contributor to DPM emissions in California, although since 2007, the ARB has found the emissions to be substantially lower than previously expected. Newer and more refined emission inventories have substantially lowered the estimates of DPM emissions from off-road equipment such that off-road equipment is now considered the sixth largest source of DPM emissions in California. This reduction in emissions is due, in part, to effects of the economic recession and refined emissions estimation methodologies. For example, revised particulate matter (PM) emission estimates for the year 2010, which DPM is a major component of total PM, have decreased by 83 percent from previous estimates for the SFBAAB. Approximately half of the reduction can be attributed to the economic recession and approximately half can be attributed to updated assumptions independent of the economic recession (e.g., updated methodologies used to better assess construction emissions).

Additionally, a number of federal and state regulations are requiring cleaner off-road equipment. Specifically, both the USEPA and California have set emissions standards for new off-road equipment engines, ranging from Tier 1 to Tier 4. Tier 1 emission standards were phased in between 1996 and 2000 and Tier 4 Interim and Final emission standards for all new engines would be phased in between 2008 and 2015. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control technologies. Although the full benefits of these regulations will not be realized for several years, the USEPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent.⁷⁰ Furthermore, California regulations limit maximum idling times to five minutes, which further reduces public exposure to DPM emissions.⁷¹

In addition, construction activities do not lend themselves to analysis of long-term health risks because of their temporary and variable nature. As explained in the BAAQMD's CEQA Air Quality Guidelines:

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⁶⁶ ARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, p.1 and p. 13 (Figure 4), October 2010.

⁶⁷ ARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, October 2010.

⁶⁸ ARB, "In-Use Off-Road Equipment, 2011 Inventory Model," Query accessed online, April 2, 2012, http://www.arb.ca.gov/msei/categories.htm#inuse_or_category.

ARB, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Proposed Amendments to the Regulation for In-Use Off-Road Diesel-Fueled Fleets and the Off-Road Large Spark-Ignition Fleet Requirements, October 2010.

⁷⁰ United State Environmental Protection Agency (USEPA), "Clean Air Nonroad Diesel Rule: Fact Sheet," May 2004.

⁷¹ California Code of Regulations, Title 13, Division 3, § 2485.

"Due to the variable nature of construction activity, the generation of TAC emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet (ARB 2005). In addition, current models and methodologies for conducting health risk assessments are associated with longer-term exposure periods of 9, 40, and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities. This results in difficulties with producing accurate estimates of health risk."⁷²

Therefore, project-level analyses of construction activities have a tendency to produce overestimated assessments of long-term health risks. However, within the Air Pollutant Exposure Zone, as discussed above, additional construction activity may adversely affect populations that are already at a higher risk for adverse long-term health risks from existing sources of air pollution.

Although on-road heavy-duty diesel vehicles and off-road equipment would be used during construction of such future projects, emissions would be temporary and variable in nature and would not be expected to expose sensitive receptors to substantial air pollutants. Furthermore, the proposed project would be subject to, and would comply with, San Francisco's Clean Construction Ordinance and California regulations limiting idling to no more than five minutes, which would further reduce nearby sensitive receptors exposure to temporary and variable DPM emissions. Therefore, construction period TAC emissions would result in a less-than-significant impact to sensitive receptors.

As discussed above, the Planning Department screens each of these future projects to determine whether the project site is located in an identified Air Pollutant Exposure Zone and ensures that any conditions imposed by the decision body on the project are satisfied through the mitigation monitoring and reporting program (MMRP).

In light of the above, implementation of the draft ROSE Update would not expose sensitive receptors to substantial pollutant concentrations.

Impact AQ-3: The proposed project would not conflict with, or obstruct implementation of, the 2010 CAP. (Less than Significant).

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

⁷² BAAQMD, CEQA Air Quality Guidelines, May 2011, page 8-6.

The primary goals of the CAP are to: (1) reduce emissions and decrease concentrations of harmful pollutants, (2) safeguard the public health by reducing exposure to air pollutants that pose the greatest health risk, and (3) reduce greenhouse gas emissions. To meet the primary goals, the CAP recommends specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. The CAP recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and greenhouse gases from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options. To this end, the CAP includes 55 control measures aimed at reducing air pollution in the SFBAAB.

Implementation of the draft ROSE Update would not directly involve construction activities that would generate criteria air pollutants or TACs. While future construction projects associated with the draft ROSE Update may result in trips transporting construction materials or workers from or to project sites (primarily parks or open spaces), the total number of such trips would be substantially similar to that occurring under the current, 1986 ROSE. In addition, the draft ROSE Update would be generally consistent with the *San Francisco General Plan*, as discussed in Section C. Transportation control measures that are identified in the CAP are implemented by the *San Francisco General Plan* and the Planning Code, for example, through the City's Transit First Policy, bicycle parking requirements, and transit impact development fees. Compliance with these requirements would ensure the project includes relevant transportation control measures specified in the CAP. Therefore, the future construction projects associated with the draft ROSE Update would include applicable control measures identified in the CAP to the meet the CAP's primary goals.

Examples of a project that could cause the disruption or delay of CAP control measures are projects that would preclude the extension of a transit line or bike path, or projects that propose excessive parking beyond parking requirements. The draft ROSE Update or future construction projects associated with the draft ROSE Update would not preclude the extension of a transit line or a bike path or result in excessive parking beyond parking requirements, and thus would not disrupt or hinder implementation of control measures identified in the CAP.

For the reasons described above, the proposed project would not interfere with implementation of the 2010 Clean Air Plan, and because the proposed project would be consistent with the applicable air quality plan that demonstrates how the region will improve ambient air quality and achieve the state and federal ambient air quality standards, this impact would be less than significant.

Impact AQ-4: The proposed project would not create objectionable odors that would affect a substantial number of people. (Less than Significant)

Typical odor sources of concern include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During construction, diesel exhaust from construction equipment would generate some odors. However, construction-related odors would be temporary and would not persist upon project completion.

Implementation of the draft ROSE Update or future construction projects associated with the draft ROSE Update would not result in any significant source of new odors. Therefore, odor impacts would be less than significant.

Cumulative Air Quality Impacts

Impact C-AQ: The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area would result in less-than-significant cumulative air quality impacts. (Less than Significant)

As discussed above, regional air pollution is by its very nature largely a cumulative impact. Emissions from past, present and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.⁷³ The project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. The draft ROSE Upgrade in and of itself would not result in construction activities that would generate fugitive dust or emit criteria air pollutants or TACs. In addition, future construction activities associated with the draft ROSE Update would be substantially similar in nature and scope to those currently ongoing under the 1986 ROSE, the draft ROSE Upgrade would not be considered to result in a cumulatively considerable contribution to regional, construction air quality impacts.

Furthermore, the Planning Department screens each of these future projects to determine whether the project exceeds the criteria established by the BAAQMD and whether the project site is located in an identified Air Pollutant Exposure Zone and ensures that any conditions imposed by the decision body on the project are satisfied through the mitigation monitoring and reporting program (MMRP).

Given the above, the project's incremental increase in localized emissions of criteria air pollutants or TACs would not contribute substantially to cumulative criteria air pollutant or TAC emissions

⁷³ BAAQMD, CEQA Air Quality Guidelines, May 2011, page 2-1.

that could affect sensitive land uses. Therefore, cumulative air quality impacts would be considered less than significant.

Topics:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
8.	GREENHOUSE GAS EMISSIONS— Would the project:					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?					
b)	Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?					

Environmental Setting

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG's has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

Individual projects contribute to the cumulative effects of climate change by emitting GHGs during demolition, construction, and operational phases. While the presence of the primary GHGs in the atmosphere is naturally occurring, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of carbon dioxide are largely byproducts of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Black carbon has recently emerged as a major contributor to global climate change, possibly second only to CO₂. Black carbon is produced naturally and by human activities as a result of the incomplete combustion of fossil fuels, biofuels and biomass.⁷⁴ N₂O is a byproduct of various industrial processes and has a number of uses, including use as an anesthetic and as an aerosol propellant. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO₂E).⁷⁵

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Many impacts resulting from climate change, including

⁷⁴ Center for Climate and Energy Solutions. What is Black Carbon?, April 2010. Available online at: http://www.c2es.org/docUploads/what-is-black-carbon.pdf. Accessed September 27, 2012.

⁷⁵ Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

increased fires, floods, severe storms and heat waves, are occurring already and will only become more frequent and more costly. Fe Secondary effects of climate change are likely to include a global rise in sea level, impacts to agriculture, the state's electricity system, and native freshwater fish ecosystems, an increase in the vulnerability of levees in the Sacramento-San Joaquin Delta, changes in disease vectors, and changes in habitat and biodiversity. Tr, 78

The California Air Resources Board (ARB) estimated that in 2009 California produced about 457 million gross metric tons of CO₂E (MMTCO₂E).⁷⁹ The ARB found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state generation and imported electricity) at 23 percent and industrial sources at 18 percent. Commercial and residential fuel use (primarily for heating) accounted for nine percent of GHG emissions.⁸⁰ In the Bay Area, the transportation (on-road motor vehicles, off-highway mobile sources, and aircraft) and industrial/commercial sectors were the two largest sources of GHG emissions, each accounting for approximately 36 percent of the Bay Area's 95.8 MMTCO₂E emitted in 2007.⁸¹ Electricity generation accounts for approximately 16 percent of the Bay Area's GHG emissions followed by residential fuel usage at seven percent, off-road equipment at three percent and agriculture at one percent.⁸²

Regulatory Setting

In 2005, in recognition of California's vulnerability to the effects of climate change, then-Governor Schwarzenegger established Executive Order (EO) S-3-05, which sets forth a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels (approximately 457 MMTCO₂E); by 2020, reduce emissions to 1990 levels (estimated at 427 MMTCO₂E); and by 2050 reduce statewide GHG emissions to 80 percent below 1990 levels (approximately 85 MMTCO₂E).

In response, the California legislature passed Assembly Bill No. 32 in 2006 (California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and

⁷⁶ California Climate Change Portal. Available online at: http://www.climatechange.ca.gov. Accessed September 25, 2012.

⁷⁷ California Climate Change Portal. Available online at: http://www.climatechange.ca.gov. Accessed September 25, 2012.

⁷⁸ California Energy Commission. California Climate Change Center. *Our Changing Climate* 2012. Available online at: http://www.energy.ca.gov/2012publications/CEC-500-2012-007/CEC-500-2012-007.pdf. Accessed August 21, 2012.

⁷⁹ ARB. California Greenhouse Gas Inventory for 2000-2009 — by Category as Defined in the Scoping Plan. Available online at: http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-09_2011-10-26.pdf. Accessed August 21, 2012.

⁸⁰ ARB. California Greenhouse Gas Inventory for 2000-2009 — by Category as Defined in the Scoping Plan. Available online at: http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_00-09_2011-10-26.pdf. Accessed August 21, 2012.

⁸¹ BAAQMD. Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, February 2010. Available online at: http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ash x. Accessed August 21, 2012.

⁸² BAAQMD. Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010. Available online at:

 $http://www.baaqmd.gov/\sim/media/Files/Planning\%20 and\%20 Research/Emission\%20 Inventory/regional inventory 2007_2_10. ash x. Accessed August 21, 2012.$

other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction from forecast emission levels).83

Pursuant to AB 32, ARB adopted a Scoping Plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. The Scoping Plan is the State's overarching plan for addressing climate change. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business as usual emissions levels, or about 15 percent from 2008 levels. The Scoping Plan estimates a reduction of 174 million metric tons of CO₂E (MMTCO₂E) (about 191 million U.S. tons) from the transportation, energy, agriculture, forestry, and high global warming potential sectors, see Table 6, below. ARB has identified an implementation timeline for the GHG reduction strategies in the Scoping Plan. 85

Table 6. GHG Reductions from the AB 32 Scoping Plan Sectors^{86,87}

GHG Reduction Measures By Sector	GHG Reductions (MMT CO₂E)
Transportation Sector	62.3
Electricity and Natural Gas	49.7
Industry	1.4
Landfill Methane Control Measure (Discrete Early Action)	1
Forestry	5
High Global Warming Potential GHGs	20.2
Additional Reductions Needed to Achieve the GHG Cap	34.4
Total	174
Other Recommended Measures	
Government Operations	1-2
Methane Capture at Large Dairies	1
Additional GHG Reduction Measures:	
Water	4.8
Green Buildings	26
High Recycling/ Zero Waste	
Commercial Recycling	
 Composting 	9
 Anaerobic Digestion 	9
 Extended Producer Responsibility 	
 Environmentally Preferable Purchasing 	
Total	41.8-42.8

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⁸³ Governor's Office of Planning and Research (OPR). Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review, June 19, 2008. Available online at: http://opr.ca.gov/docs/june08-ceqa.pdf. Accessed August 21, 2012.

⁸⁴ ARB. *California's Climate Plan: Fact Sheet*. Available online at: http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed August 21, 2012.

⁸⁵ ARB. Assembly Bill 32: Global Warming Solutions Act. Available online at: http://www.arb.ca.gov/cc/ab32/ab32.htm/. Accessed August 21, 2012.

⁸⁶ ARB. Climate Change Scoping Plan, December 2008. Available online at: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 21, 2012.

⁸⁷ ARB. California's Climate Plan: Fact Sheet. Available online at: http://www.arb.ca.gov/cc/facts/scoping_plan_fs.pdf. Accessed August 21, 2012.

The AB 32 Scoping Plan recommendations are intended to curb projected business-as-usual growth in GHG emissions and reduce those emissions to 1990 levels. Therefore, meeting AB 32 GHG reduction goals would result in an overall annual net decrease in GHGs as compared to current levels and accounts for projected increases in emissions resulting from anticipated growth.

The Scoping Plan also relies on the requirements of Senate Bill 375 (SB 375) to implement the carbon emission reductions anticipated from land use decisions. SB 375 was enacted to align local land use and transportation planning to further achieve the State's GHG reduction goals. SB 375 requires regional transportation plans, developed by Metropolitan Planning Organizations (MPOs), to incorporate a "sustainable communities strategy" in their regional transportation plans (RTPs) that would achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 would be implemented over the next several years and the Bay Area Metropolitan Transportation Commission's 2013 RTP, Plan Bay Area, would be its first plan subject to SB 375.

AB 32 further anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from current levels for local governments themselves and noted that successful implementation of the Scoping Plan relies on local governments' land use planning and urban growth decisions because local governments have the primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions. The BAAQMD has conducted an analysis of the effectiveness of the region in meeting AB 32 goals from the actions outlined in the Scoping Plan and determined that in order for the Bay Area to meet AB 32 GHG reduction goals, the Bay Area would need to achieve an additional 2.3 percent reduction in GHG emissions from the land use driven sector. Figure 15.

At a local level, the City has developed a number of plans and programs to reduce the City's contribution to global climate change. San Francisco's GHG reduction goals, as outlined in the 2008 Greenhouse Gas Reduction ordinance are as follows: by 2008, determine the City's GHG emissions for the year 1990, the baseline level with reference to which target reductions are set; by 2017, reduce GHG emissions by 25 percent below 1990 levels; by 2025, reduce GHG emissions by 40 percent below 1990 levels; and finally by 2050, reduce GHG emissions by 80 percent below 1990 levels. San Francisco's Greenhouse Gas Reduction Strategy documents the City's actions to pursue cleaner energy, energy conservation, alternative transportation and solid waste policies. As identified in the Greenhouse Gas Reduction Strategy, the City has implemented a number of mandatory requirements and incentives that have measurably reduced GHG emissions including, but not limited to, increasing the energy efficiency of new and existing buildings,

20Dec%207%2009.ashx. Accessed September 25, 2012.

⁸⁸ ARB. Climate Change Scoping Plan. December 2008. Available online at: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed August 21, 2012.

⁸⁹ BAAQMD. California Environmental Quality Act Guidelines Update, Proposed Thresholds of Significance, December 2009. Available online at: http://www.baaqmd.gov/~/media/Files/Planning%20and%20Research/CEQA/Proposed%20Thresholds%20of%20Significance%

installation of solar panels on building roofs, implementation of a green building strategy, adoption of a zero waste strategy, a construction and demolition debris recovery ordinance, a solar energy generation subsidy, incorporation of alternative fuel vehicles in the City's transportation fleet (including buses), and a mandatory recycling and composting ordinance.

The Greenhouse Gas Reduction Strategy concludes that San Francisco's policies and programs have resulted in a reduction in GHG emissions below 1990 levels, exceeding statewide AB 32 GHG reduction goals. San Francisco's communitywide 1990 GHG emissions were approximately 6,201,949 MTCO₂E. As stated above, San Francisco GHG emissions in 2010 were 5,299,757 MTCO₂E, which is a 14.5 percent reduction in GHG emissions compared to 1990 levels. The reduction has largely come from the electricity sector, from 2,032,085 MTCO₂E (year 1990) to 1,333,959 MTCO₂E (year 2010), and waste sector, from 472,646 MTCO₂E (year 1990) to 244,625 MTCO₂E (year 2010).90

Approach to Analysis

GHG emissions and global climate change represent cumulative impacts. GHG emissions contribute, on a cumulative basis, to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; the combination of GHG emissions from past, present, and future projects have contributed to global climate change and its associated environmental impacts. There does not currently appear to be a consensus in the scientific community as to when and under what circumstances a project's incremental contribution to climate change would be considered cumulatively considerable.

CEQA Guidelines Sections 15064.4 and 15183.5 address the analysis and determination of significant impacts from a proposed project's GHG emissions. CEQA Guidelines Section 15064.4 allows lead agencies to rely on a qualitative analysis to describe GHG emissions resulting from a project. CEQA Guidelines Section 15183.5 allows for public agencies to analyze and mitigate GHG emissions as part of a larger plan for the reduction of greenhouse gases and describes the required contents of such a plan. Consistent with these sections, San Francisco has prepared its own Greenhouse Gas Reduction Strategy (described above). The BAAQMD has reviewed San Francisco's Greenhouse Gas Reduction Strategy, concluding that "Aggressive GHG reduction targets and comprehensive strategies like San Francisco's help the Bay Area move toward reaching the State's AB 32 goals, and also serve as a model from which other communities can learn."91

Consistent with CEQA Guidelines Sections 15064.4 and 15183.5, the GHG analysis below includes a qualitative assessment of GHG emissions that would result from a proposed project

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⁹⁰ San Francisco Department of Environment (SFDOE). San Francisco Community -Wide Carbon Emissions by Category, Excel spreadsheet provided via email between Pansy Gee, SFDOE and Wade Wietgrefe, San Francisco Planning Department, June 7, 2013.

⁹¹ BAAQMD. Letter from J. Roggenkamp, BAAQMD, to B. Wycko, San Francisco Planning Department, October 28, 2010. Available online at: http://www.sf-planning.org/ftp/files/MEA/GHG-Reduction_Letter.pdf. Accessed September 24, 2012.

and an assessment of the proposed project's compliance with San Francisco's Greenhouse Gas Reduction Strategy.

Given that the City's local greenhouse gas reduction targets are more aggressive than the State and Region's 2020 GHG reduction targets and consistent with the long-term 2050 reduction targets, the City's Greenhouse Gas Reduction Strategy is consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan. Therefore, proposed projects that are consistent with the City's Greenhouse Gas Reduction Strategy would be consistent with the goals of EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan, would not conflict with these plans, and would therefore not exceed San Francisco's applicable GHG threshold of significance.

The following analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions. Given that the analysis is in a cumulative context and that implementation of the draft ROSE Upgrade does not involve construction activities that would emit GHGs, this section does not include an individual project-specific impact statement.

Impact C-GG: The proposed project would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (Less than Significant)

Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers, energy required to pump, treat, and convey water, and emissions associated with waste removal, disposal, and landfill operations.

Implementation of the draft ROSE Update is a regulatory program and in and of itself would not directly involve construction activities that would generate GHGs. The draft ROSE Update's objectives and policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provide a high level of service to their users with numerous amenities. About one-half of the objectives and policies in the draft ROSE Update correlate to existing policies and objectives in the current ROSE, meaning that the draft ROSE Update policies are substantially similar to those in the existing ROSE. Furthermore, in instances where new objectives and policies are introduced, these typically relate to sustainability and environmental stewardship (Objectives 4 and 5), as well as funding and management (Objective 6). Based on this, implementation of the draft ROSE Update would not conflict with the City's Greenhouse Gas Reduction Strategy.

The draft ROSE Update includes policies that may indirectly result in construction activities, which would emit GHGs. These construction activities include ground-disturbing activities associated with park maintenance, streetscape improvements, or construction of recreational facilities. Therefore, the draft ROSE Update could indirectly contribute to annual long-term

increases in GHGs as a result of increased vehicle trips (mobile sources) and operation and maintenance of recreational facilities that result in an increase in energy use, water use, wastewater treatment, and solid waste disposal. Construction activities could also result in temporary increases in GHG emissions.

The future construction activities that may result from the implementation of the draft ROSE Update would be subject to project-specific review and may be required to comply with several regulations adopted to reduce GHG emissions as identified in the GHG Reduction Strategy and the RPD's Climate Action Plan.

The regulations in the GHG Reduction Strategy, as outlined in San Francisco's *Strategies to Address Greenhouse Gas Emissions*, have proven effective as San Francisco's GHG emissions have measurably reduced when compared to 1990 emissions levels, demonstrating that the City has met and exceeded EO S-3-05, AB 32, and the Bay Area 2010 Clean Air Plan GHG reduction goals for the year 2020. Other existing regulations, such as those implemented through AB 32, will continue to reduce a proposed project's contribution to climate change. Therefore, GHG emissions resulting from future projects that are associated with the draft ROSE Update would not conflict with state, regional, and local GHG reduction plans and regulations, and thus such future projects' contribution to GHG emissions would not be cumulatively considerable or generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment.

In light of the above, implementation of the draft ROSE Update would result in a less-thansignificant impact with respect to GHG emissions. In general, city parks do not contribute substantially to GHG emissions. No mitigation measures are necessary.

Тор	pics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
9.	WIND AND SHADOW—Would the project:					
a)	Alter wind in a manner that substantially affects public areas?					
b)	Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?					

Impact WS-1: The draft ROSE Update would not alter wind in a matter that substantially affects public areas. (Less than Significant)

Wind impacts are generally caused by large building masses extending substantially above neighboring buildings, and by buildings oriented such that a new large wall catches a prevailing wind, particularly if such a wall contains little or no articulation. Average wind speeds in San Francisco are greatest in summer and least in the fall. Winds also exhibit a diurnal variation with the strongest winds occurring in the afternoon and the lightest winds occurring in the early

morning. Winds in the City occur most frequently from the west to northwest directions, reflecting the persistence of sea breezes. Wind direction is most variable in the winter.⁹² The approach of winter storms often results in southerly winds. Although not as frequent as westerly winds, these southerly winds are often strong. The strongest winds in the City are typically from the south during the approach of a winter storm.

Winds vary at pedestrian levels within a city. In San Francisco wind strength is generally greater, on average, along streets that run east-west as buildings tend to channel westerly winds along these streets. Streets running north-south tend to have lighter winds, on average, due to the shelter offered by buildings on the west side of the street. Within the City, the streets systems north of Market Street and portions of the systems south of Market Street (including those in the Mission District, Potrero Hill, Mission Bay, and Central Waterfront) are mainly on a north/south and east/west grid. However, portions of the street systems south of Market Street (including those in South of Market, South Beach, Bayview Hunters Point, and Visitacion Valley) are mainly northwest/southeast and southwest/northeast, which results in a less predictable pattern of wind variation at the pedestrian level.

New construction could result in wind impacts if future buildings were constructed in a manner that would increase ground-level wind speeds. Typically, new development greater than 85 feet in height could potentially affect ground level wind speeds. Buildings that would result in wind speeds that exceed the hazard criterion of 26 miles per hour (mph) for one hour of the year would result in a significant wind impact.

The Planning Department evaluates potential wind impacts on a project-level basis, and generally evaluates wind effects by using the wind hazard criterion to determine CEQA significance. Any new building or addition that would cause wind speeds to exceed the hazard level of 26-mph-equivalent wind speed (as defined in the Planning Code) more than one hour of any year must be modified and is subject to the relevant wind hazard criterion. Buildings below 85 feet generally do not have the potential to affect wind speeds. Buildings that extend in height above surrounding development have more impact than those of similar height to surroundings. As noted in Section E.1, Land Use, p. 35, existing controls would regulate the type of buildings and/or additions in public spaces, including parks.

The draft ROSE Update does not include any policy or objective that could in and of itself result in adverse wind effects. To the extent that future recreation buildings or the like could be proposed within parks or recreational areas, the potential for adverse wind effects would be assessed in conjunction with the particular proposal. However, buildings and structures within parks are typically far below the height necessary to create substantial wind impacts. Thus, implementation of the draft ROSE Update would not result in significant wind impacts.

⁹² Market and Octavia Neighborhood Plan Final EIR, page 4-14, adopted September 2007. This document is available for review at the Planning Department as part of Case File No. 2003.0347E

⁹³ Ibid.

^{94 &}quot;Equivalent wind speed" is defined as an hourly mean wind speed adjusted to incorporate the effects of gustiness or turbulence on pedestrians. San Francisco Planning Code Section 148(b).

Impact WS-2: The draft ROSE Update would not create new shadow in a manner that could substantially affect outdoor recreation facilities or other public areas. (Less than Significant)

Section 295 of the Planning Code was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the RPD by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant.

In general, all applications for new construction or additions to existing buildings above 40 feet in height must be reviewed to determine whether a project would cast additional shadows on properties under the jurisdiction of, or designated to be acquired by the RPD. In this case, the Planning Department develops a "shadow fan" diagram that shows the maximum extent of the shadows cast by a proposed building throughout the year, between one hour after sunrise and one hour before sunset. If the shadow fan indicates a project shadow does not reach any property protected by Planning Code Section 295 (the sunlight ordinance), no further review related to such properties is required. If the shadow fan shows that a project has potential to shade such properties, further analysis is required.

Furthermore, the Code regulates sunlight access on particular downtown street segments during certain daytime hours. Specifically, Planning Code Section 146(a) includes sunlight access criteria to allow direct sunlight to reach sidewalk areas of designated streets during critical hours of the day. In the case of sidewalks, the critical hours are considered to be midday hours. The Code designates 18 streets within the project area (all near the Downtown) as subject to Section 146(a). Individual projects within downtown must comply with Section 146(a) requirements, or obtain an allowable exception under Section 309 of the Code.

The Code Section 146(c) includes sunlight access criteria to reduce substantial shadow impacts on public sidewalks in the C-3 Districts other than those protected by Section 146(a). New buildings and additions to existing structures must minimize any substantial shadow impacts in the C-3 (Downtown) Districts not protected under Subsection (a), as long as this can be accomplished without the creation of unattractive building design and the undue restriction of development potential. The Code Section 147 states that new buildings and additions to existing buildings in C-3, South of Market Mixed Use, and Eastern Neighborhoods Mixed Use Districts where the building height exceeds 50 feet shall be shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site in question, to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section 295.

Existing ROSE Policy 2.3 calls for "Preserv[ing] sunlight in public open spaces." The draft ROSE Update proposes the identical policy (Policy 1.9). To the extent that future recreation buildings could be proposed on parks or in recreational areas (or on sites adjacent to such spaces), the potential for adverse shadow effects would be assessed in conjunction with the particular proposal; the draft ROSE Update neither alters Policy 2.3 in the existing ROSE, nor would otherwise amend the Planning Department's procedures regarding the review of shadow effects.

Therefore, the draft ROSE Update would not create shadow in a manner that substantially affects outdoor recreation facilities or other public areas.

In light of the above, the draft ROSE Update would not result significant shadow impacts.

Impact C-WS: Implementation of the draft ROSE Update, in combination with other past, present or reasonably foreseeable projects, would not result in less-than-significant wind and shadow impacts. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to wind or shadow. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond, 95 the 2012 Parks Bond, 96 the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant shadow and wind impacts and would not contribute considerably to adverse shadow and wind effects under cumulative conditions. For the reasons discussed above, the proposed project's impacts related to shadow and wind, both individually and cumulatively, would be less than significant.

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
10.	RECREATION—Would the project:					
a)	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?					
b)	Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?					
c)	Physically degrade existing recreational resources?					

⁹⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

⁹⁶ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Impact RE-1: The draft ROSE Update policies would not cause substantial physical deterioration of citywide parks or otherwise physically degrade existing recreational resources. (Less than Significant)

The draft ROSE Update's objectives and policies seek to ensure that all of the City's parks and open spaces are high performing and satisfactorily maintained, and are part of a unified and connected open space system that provide a high level of service to their users with numerous amenities.

The draft ROSE Update includes objectives and policies that address maintenance and physical deterioration of existing park and recreational facilities, including Policy 1.2 ("Prioritize renovation of highly-utilized open spaces in high needs areas."); Policy 1.4 ("Maintain and repair open spaces to modern maintenance standards."); Policy 1.6 ("Support the continued improvement of Golden Gate Park while preserving the beauty of its naturalistic landscape."); Policy 3.6 ("Maintain, restore, expand and fund the urban forest."); Objective 4 "Protect and enhance the biodiversity, habitat value, and ecological integrity of open spaces."; and Policy 4.3 ("Integrate the protection and restoration of local biodiversity into all open space construction, renovation, management and maintenance using environmentally sustainable design principles."); and Policy 4.4 ("Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities.")

The draft ROSE Update, a regulatory program, would not directly physically degrade any recreational resources citywide. The draft ROSE Update includes policies that call for maintaining and repairing facilities to the highest level of quality and encourage long-term resources and management for open space acquisition, operations and maintenance. As such, implementation of the ROSE Update would result in less-than-significant physical impacts to recreational resources, both individually and cumulatively.

Impact RE-2: The draft ROSE Update would not entail construction or expansion of recreational facilities that might have an adverse physical effect on the environment. (No Impact)

The ROSE provides the goals, objectives and policies that guide open space development, acquisition and priorities for San Francisco over a roughly 25-year future timeframe. If adopted the draft ROSE Update would supersede the City's existing, 1986 ROSE that was enacted in 1986. As described in the project description of this Initial Study, no specific recreation and/or park projects are proposed as part of the draft ROSE Update.

Future projects resulting from the draft ROSE Update will be subject to project-specific environmental review, in order to evaluate the potential of the specific undertaking to have an adverse physical effect on the environment. However, the policies included in the draft ROSE Update, including the implementation actions described above, would not result in adverse physical environmental impacts. Thus, implementation of the draft ROSE Update, therefore would have a less-than-significant impact on recreational facilities.

Impact C-RE: Implementation of the draft ROSE Update, in combination with past, present, and reasonable foreseeable future projects, would not considerably contribute to recreation impacts in the project site vicinity. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant recreation impacts. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,⁹⁷ the 2012 Parks Bond,⁹⁸ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreational resources. As stated above, implementation of the draft ROSE Update would not noticeably increase the use of existing neighborhood parks or other recreational facilities; would not require the construction of recreational facilities; and would not physically degrade existing recreation facilities. Furthermore, the contribution of the proposed project to cumulative recreation-related impacts would not be considerable. For the reasons discussed above, the proposed project's impacts related to recreation, both individually and cumulatively, would be less than significant.

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
11.	UTILITIES AND SERVICE SYSTEMS—Would the project:					
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?					
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?					
c)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?					

⁹⁷ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

⁹⁸ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Тор	oics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
d)	Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?					
e)	Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?					
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?					
g)	Comply with federal, state, and local statutes and regulations related to solid waste?					

Impact UT-1: Implementation of the draft ROSE Update would result in a less-than-significant impact to wastewater collection and treatment facilities and would not require or result in the construction of new stormwater drainage facilities or expansion of existing facilities. (No Impact)

The City requires National Pollutant Discharge Elimination System (NPDES) permits, as administered by the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB), according to federal regulations for both point source discharges (a municipal or industrial discharge at a specific location or pipe) and nonpoint source discharges (diffuse runoff of water from adjacent land uses) to surface waters of the U.S. For point source discharges, such as sewer outfalls, each NPDES permit contains limits on allowable concentrations and mass emissions of pollutants contained in the discharge.

The policies in the draft ROSE Update would not directly result in the construction of new parks or recreational facilities, but would serve to guide how and where the development and maintenance of these uses should occur in the future. Subsequent construction activities would be required to comply with all provisions of the NPDES program, as enforced by the SFBRWQCB. Therefore, the proposed draft ROSE Update would not directly result in an exceedance of wastewater treatment requirements. Additionally, the NPDES Phase I and Phase II requirements would regulate discharge from construction sites. Future recreation and park development would be required to comply with all applicable wastewater discharge requirements issued by the State Water Resources Control Board (SWRCB) and SFBRWQCB. The policies and objectives in the draft ROSE Update would also not conflict with the City's Green Building Ordinance. This ordinance addresses stormwater management by seeking to reduce impervious cover, promote infiltration, and capture and treat 90 percent of the runoff from an average annual rainfall event using acceptable Best Management Practices.

In addition, subsequent projects would also be subject to the Stormwater Management Ordinance (SMO), which became effective on May 22, 2010. This ordinance requires that any project resulting in a ground disturbance of 5,000 square feet or greater prepare a Stormwater Control Plan (SCP), consistent with the November 2009 Stormwater Design Guidelines (SDG). Responsibility for approval of the SCP is with the SFPUC Wastewater Enterprise, Urban Watershed Management Program (UWMP); or if a project is located on Port property, with the Port. The ordinance requires compliance with the Stormwater Design Guidelines (SDG).

As per the requirements of the SDG, projects must achieve the performance requirements of LEED Sustainable Sites (SS) c6.1, "Stormwater Design: Quantity Control," which require implementation of stormwater management approachs to prevent stormwater runoff flow rate and volume from exceeding existing conditions for the one- and two-year 24-hour design storm. For projects with impervious areas greater than 50 percent, a stormwater management approach must be implemented that reduces existing stormwater runoff flow rate and volume by 25 percent for a two-year 24-hour design storm. Projects are required to minimize disruption of natural hydrology by implementing Low Impact Design approaches such as reduced impervious cover, reuse of stormwater, or increased infiltration. This in turn would limit the incremental demand on both the collection system and wastewater facilities resulting from stormwater discharges, and minimize the potential for upsizing or constructing new facilities.

The SFPUC is currently developing a Sewer System Improvement Program (SSIP) to address anticipated infrastructure issues, to meet anticipated regulatory requirements, as well as to accommodate planned growth.⁹⁹ Projections for sewer service demand were assessed to 2030 to determine future population, flows, and loads based on 1) population information provided by the ABAG and accepted by the Planning Department; 2) flows projected by the SFPUC based on water usage within the city; and 3) flows projected by the outside agencies that are discharging into San Francisco's sewer system based on agreements made with the USEPA during the grants programs of the 1970s and 1980s. Implementation of the draft ROSE Update would not conflict with the Sewer System Master Plan nor would be expected to exceed applicable wastewater treatment requirements of the SFBRWQCB with respect to discharges to the sewer system or stormwater system within the City. Therefore, the draft ROSE Update would have a less than significant impact with respect to the exceedance of wastewater treatment requirements.

Impact UT-2: The City projects that there would be sufficient water supplies and entitlements to serve anticipated citywide population growth; implementation of the draft ROSE Update would not require expansion or construction of new water treatment facilities. (Less than Significant)

The SFPUC provides water to approximately 2.4 million people in San Francisco, Santa Clara, Alameda, San Mateo, and Tuolumne Counties. Approximately 96 percent of the water provided to San Francisco is supplied by the SFPUC Regional Water System, which is made up of water

⁹⁹ SFPUC. Sewer System Improvement Program (SSIP). Available online at: http://www.sfwater.org/index.aspx?page=116. Accessed February 18, 2014.

from the Hetch Hetchy Reservoir and Bay Area reservoirs in the Alameda Creek and Peninsula watersheds.¹⁰⁰

Citywide water use in the year 2000 was approximately 84 million gallons per day (mgd), of which about 57 percent was for residential customers and about 34 percent for business. Systemwide demand from both retail and wholesale customers is projected to increase to about 300 mgd by 2030. Residential water demand in San Francisco is expected to decrease slightly between 2000 and 2030, in spite of a projected increase in the City's population, because of an anticipated decrease in household size and an increased use of water-efficient plumbing fixtures.

The 2010 Urban Water Management Plan (UWMP) for the City projects that, during normal precipitation years, the SFPUC will have adequate supplies to meet projected demand. During multiple dry years, however, additional water sources will be required. To address this issue, the SFPUC initiated the multi-year program Water System Improvement Program (WSIP) to rebuild and upgrade the water system and is currently implementing the WSIP to provide improvements to its water infrastructure. The SFPUC also is developing an Integrated Water Resource Plan, a planning document detailing how long-term water demand can also be met through a mix of water supply options (such as groundwater, recycled water, conservation, and imported water).

Future parks and recreational facilities could increase demand for water resources primarily associated with irrigation for landscaping. The RPD is the biggest user of water in the city, with an annual total usage of 691 million gallons. According to the UWMP, approximately 2.5 mgd of ground water are used for irrigation purposes.

In recognition of water demands associated with irrigation, the SFPUC is seeking to reduce reliance on potable water for nonpotable uses through the production and distribution of highly treated recycled water through the development of the Westside Water Project. The project objective is to meet the current demands of several SFPUC customers with substantial irrigation demands, including Golden Gate Park, Lincoln Park/Lincoln Park Golf Course (Lincoln Park), and the Presidio Golf Course. Together, the recycled water demand for these customers is estimated at 1.6 mgd (annual average). The project would be sized to accommodate peak-day demands of up to 4.5 mgd (or 2.0 mgd annual average) in anticipation that the facility could also provide future service to other nearby parks or irrigated medians. The project would involve the construction of a recycled water treatment facility and underground storage, and construction of and/or upgrades to distribution facilities (pipelines and pumping facilities) for service to these customers. The project is currently undergoing environmental review and the system is estimated to be completed by 2015. 102 Planning and feasibility of other possible projects as part of

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¹⁰⁰ Information related to water supply and summarized from San Francisco 2004 and 2009 Housing Element Final Environmental Impact Report, Case No. 2007.1275E and Water System Improvement Program Final Environmental Impact Report, Case No. 2005.0159E. These documents are available for review at the Planning Department, 1650 Mission Street, Suite 400.

^{101 2010} *Urban Warter Management Plan for the City and County of San Francisco*, San Francisco Public Utilities Commission, June 2011. This document is available for review at: http://www.sfwater.org.

¹⁰² San Francisco Westside Recycled Water Project, Notice of EIR Preparation, September 2008. This document is part of Case File No. 2008.0091E, available for review online at: http://www.sfplanning.org/index.aspx?page=1829.

the San Francisco Recycled Water Project; Harding Park Recycled Water Project; and the Sharp Park Recycled Water Project.

The San Francisco Green Landscaping Ordinance (No. 84-10) was adopted on April 22, 2010 and applies to new development projects and projects involving significant alternation. The ordinance requires landscaping of publicly visible areas and rights-of-way including front yards, parking lot perimeters, and pedestrian walkways, as well as screening of parking and vehicular use areas. The ordinance also requires compliance with San Francisco Administrative Code Chapter 63, which applies to property owners requesting a new irrigation water service meter with a landscape area of 1,000 square feet or larger. The goals of the Green Landscaping Ordinance include the following: healthier and more plentiful plantings through screening, parking lot, and street tree controls; increased permeability through front yard and parking lot controls; encourage responsible water use through increasing "climate appropriate" plantings; and improved screening by creating an ornamental fencing requirement and requiring screening for newly defined "vehicle use areas." 103

San Francisco's Water Efficient Irrigation Ordinance (Chapter 63 of the Administrative Code) requires that landscape projects be installed, constructed, operated, and maintained in accordance with rules adopted by the SFPUC that establish a water budget for outdoor water consumption. A Maximum Applied Water Allowance, or water budget, is calculated for each landscape project and provides the project applicant with the appropriate amount of water that may be used to irrigate their landscape area. The requirements apply to public agencies and owners of residential, commercial, and mixed use properties with new construction landscape projects or rehabilitated landscape projects. If there are no plans to modify or improve the property's existing landscape or if the improvement areas are less than 1,000 square feet over a one year period, landscape documentation does not need to be submitted to the SFPUC; however, water efficient landscaping practices are encouraged. All landscapes are still subject to water waste prevention provisions. Different compliance mechanisms are applied based on the square footage of the new or rehabilitated landscape area.

The City also has adopted recycled water ordinances (Nos. 390-91, 391-91, 393-94) which require property owners, including municipal property owners, to install recycled water systems for recycled water use within designated recycled water use areas under the following circumstances: new or remodeled buildings and all subdivisions with a total cumulative area of 40,000 square feet or more or new and existing irrigated areas of 10,000 square feet or more. Non-potable recycled water is also required for soil and compaction and dust control activities during project construction (Ordinance 175-91). The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant that provides recycled water for these activities at no charge.

In sum, according to the UWMP, projected growth in residential and commercial sectors, and indirectly recreation and other uses, would be accommodated by current and future water

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¹⁰³ Complying with San Francisco's Water Efficient Irrigation Requirements, SF PUC, January 2011. This document is available for review on line at: http://sfwater.org/Modules/ShowDocument.aspx?documentID=731.

supplies through 2030. The policies and objectives in the draft ROSE Update would not require expansion or construction of new water treatment facilities to meet anticipated needs. Further, the objectives and policies would not conflict with existing ordinances that have been adopted to address water conservation. Therefore, effects on water supply and wastewater treatment facilities would be less than significant.

Impact UT-3: Implementation of the draft ROSE Update would not to substantially affect landfill capacity or conflict with the City's current disposal agreement. (Less than Significant)

Solid waste generated in San Francisco is transported to and disposed of at the Altamont Landfill. The Altamont Landfill has an annual solid waste capacity of 2,226,500 tons for the City. However, the City is below its allowed capacity, generating approximately 550,000 tons of solid waste in 2005.¹⁰⁴

The San Francisco Board of Supervisors and Commission on the Environment set the City's landfill diversion goals at 75 percent by 2010 and zero waste by 2020 (Resolutions 679-02 and 002-03-COE). In order for the City to reach its 75 percent diversion goal, it must divert over 100,000 additional tons per year from the residential, commercial and City government sectors. Recycling, composting and waste reduction efforts are expected to increasingly divert waste from the landfill. Solid waste associated with future park and recreational facility construction and operations is an assumed part of the overall projected annual waste stream that San Francisco manages. The draft ROSE Update's objectives and policies would not substantially affect the projected life of the Altamont Landfill or the City's current disposal agreement, and this impact would be less than significant.

Impact UT-4: The construction and operation of future recreation and parks projects would follow all applicable statutes and regulations related to solid waste. (No Impact)

The draft ROSE Update's policies and objectives would not conflict with pertinent federal, state and local statutes and regulations regarding the disposal of solid waste generated by construction activities; therefore, no adverse impacts would occur.

Impact C-UT: In combination with past, present, and reasonably foreseeable future projects, implementation of the draft ROSE Update would not have a substantial cumulative impact on utilities and service systems. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to utilities or service systems. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond, ¹⁰⁵ the 2012

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¹⁰⁴ Cesar Chavez Street Sewer System Improvement Project, Mitigated Negative Declaration, Case No. 2009.0276E, December 2, 2009. This report is available for review at the Planning Department.

¹⁰⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

Parks Bond,¹⁰⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than significant impacts on utilities and service systems and would not he expected to have a considerable effect on utility service provision or facilities under cumulative conditions. For the reasons discussed above, the proposed project's impacts related to utilities and service systems, both individually and cumulatively, would be less than significant.

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
12.	PUBLIC SERVICES — Would the project:					
a)	Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?					

Impact PS-1: The draft ROSE Update would not increase demand for police protection and fire protection or require new or physically altered governmental facilities, the construction of which could cause significant environmental impacts. (No Impact)

The San Francisco Police Department provides police services to residents, visitors and workers in the City from the following ten stations: Central, Southern, Bayview, Mission, North, Park, Richmond, Ingleside, Taraval, and the Tenderloin. The draft ROSE Update would not require new or physically altered governmental facilities such as police stations.

Policy 1.5 in the General Plan's Community Facilities Element states, "As they require replacement, relocate existing nonconforming facilities consistent with community desires for neighborhood police facilities." The General Plan further elaborates: 107

Stable and horse care requirements for mounted patrols, prior to the widespread use of vehicles, suggested that police stations be located in parks. Ingleside and Park Stations, which were built in 1910, are located in Balboa Park and Golden Gate Park for this

¹⁰⁶ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014

¹⁰⁷ General Plan Community Safety Element, Policy 1.5. Accessed electronically on July 25, 2011 via: http://www.sf-planning.org/ftp/General_Plan/I7_Community_Facilities.htm.

reason. Likewise, the noise aspect of pistol practice suggested the remote location of this activity at Lake Merced. Replacement of horses by vehicles and developments in gunfire muffing techniques bring into question the logic of maintaining Ingleside and Park Stations and the Pistol Range in their current remote open space settings.

In light of the high community value attached to parks in San Francisco, the preservation and restoration of park areas to park use is a long-range objective. Under the Recreation and Open Space Element of the General Plan, police facilities in designated recreation and open space areas are nonconforming uses. As these facilities become obsolete and require replacement, they should be relocated, consistent with the location and neighborhood service policies of this plan, and consistent with community desires for continued location of a district station in the neighborhood.

The draft ROSE Update does not call for elimination of any of the above police stations.

With respect to fire protection, the San Francisco Fire Department (SFFD) provides emergency services to the City. The SFFD consists of 42 engine companies, 19 truck companies, 20 ambulances, 2 rescue squads, 2 fire boats and 19 special purpose units. The engine companies are organized into 9 battalions. There are 41 permanently-staffed fire stations, and although the SFFD system has evolved over the years to respond to changing needs, the current station configuration has not changed substantially since the 1970s. 108

Implementation of the draft ROSE Update would not conflict with Policy 1.5 of the General Plan's Community Facilities Element pertaining to police facilities, nor would it conflict with the General Plan's "Principles for Fire Facilities," related to the siting of future fire stations. As such, the ROSE Update would have no impact on police or fire services.

Impact PS-2: The draft ROSE Update would and would not require the construction of new or physically altered school facilities. (No Impact)

The San Francisco Unified School District (SFUSD) provides public educational services within the City. In the last decade, overall SFUSD enrollment has gradually declined. The decline stopped in the fall of 2008, when kindergarten enrollments began to increase, reflecting a growth in birth rates five years earlier. SFUSD projections indicate that elementary enrollment will continue to grow.¹⁰⁹ The number of elementary school students will eventually rise from 25,000 students in 2008 to 27,600 in 2013, representing an 11 percent increase in five years. After a slight decline in 2009 and 2010, middle school enrollment will increase again. However, in 2013 it will still stand below current enrollment (at 11,640 compared with 11,816 in 2008). High school enrollment will experience a continuous decline over the next five years, from 19,696 students in 2008 to 18,396 in 2013. District-wide enrollment as of Fall 2008 was 55,272. The District currently

¹⁰⁸ A Review of San Francisco's Fire and EMS Services, City and County of San Francisco, Office of the Controller, April 28, 2004. This document is available for review at the Planning Department in Case File No. 2010.0641E.

¹⁰⁹ San Francisco Unified School District, Capital Plan FY 2010-2019, September 2009. Available at http://portal.sfusd.edu/data/facilities/FINAL%20APPROVED%20CAPITAL%20PLAN%2020102019%20Oct%2027%202009.pdf, accessed February 11, 2010.

maintains a property and building portfolio that has a student capacity for over 90,000 students. Thus, even with increasing enrollment, facilities throughout the City are underutilized.

Implementation of the draft ROSE Update would not change the demand for schools, and no new school facilities would be needed to accommodate the objectives of the ROSE Update. The draft ROSE Update contains Policy 1.8 which calls for "Support[ing] urban agriculture and local food security through development of policies and programs that encourage food production throughout San Francisco" and Policy 2.9, which states "Address physical and bureaucratic barriers to opening schoolyards as community open space during non-school hours." These policies are related to existing ROSE Policy 2.12 ("Expand community garden opportunities in the City") and Policy 4.2 ("Maximize joint use of other properties and facilities") and differ in that they have been refined to specifically call out school grounds in the policy objectives. Because the draft ROSE Update would not require the construction of new or physically altered schools, its implementation would have no adverse impact on public services.

Impact PS-3: The draft ROSE Update would not increase demand for government services. (No Impact)

Implementation of the draft ROSE Update would not substantially increase demand for government services and would not trigger the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts.

Impact C-PS: Implementation of the draft ROSE Update, combined with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact to public services. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to public services. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹¹¹ the 2012 Parks Bond,¹¹² the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update is not expected to increase demand for public services beyond levels anticipated and planned for by public service providers, and would

¹¹⁰ S.F.U.S.D. School Profiles 2008-2009, http://orb.sfusd.edu/profile/prfl-100.htm, accessed February 11, 2010.

¹¹¹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

¹¹² SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

not be cumulatively considerable. For the reasons discussed above, the proposed project's impacts related to public services, both individually and cumulatively, would be less than significant.

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
13.	BIOLOGICAL RESOURCES— Would the project:					
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?					
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?					
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?					
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?					
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?					
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?					

Impact BIO-1: The draft ROSE Update would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species, sensitive natural community, protected wetlands, or conflict with an adopted conservation plan. (Less than Significant)

For the purposes of this Initial Study, the term "special-status species" includes species that are: 1) legally protected by the Federal Endangered Species Act (FESA), California ESA, or Migratory Bird Treaty Act (MBTA); or 2) locally significant sensitive species, including species on the

National Audubon Society's Watch List or those under threat of local extirpation, as determined by the Yerba Buena chapter of the California Native Plant Society (CNPS) or the Golden Gate chapter of the National Audubon Society.

The policies in the draft ROSE Update would not directly result in the construction of new parks or recreational facilities, but would serve to guide how and where the development and maintenance of these uses should occur in the future. Therefore, the ROSE Update would not directly have a substantial adverse effect on any special-status species or sensitive natural community. Subsequent projects that may be proposed under the context of the ROSE Update would be subject to project specific environmental review to determine whether they would result in any biological impacts.

Existing ROSE Policy 2.13 mandates that the City "preserve and protect natural resources." Policy 4.1 in the draft ROSE Update calls for "Protect[ing], preserv[ing] and restor[ing] local biodiversity." The draft ROSE Update would not conflict with existing or foreseeable plans or programs that pertain to the protection of special status species or other natural resources. Therefore, implementation of the draft ROSE Update would not have a substantial adverse effect, either directly or through habitat modifications, on any special-status species, sensitive natural community, protected wetlands, or conflict with an adopted conservation plan.

In the late 1990s, the RPD developed a Natural Areas Program to protect and manage natural areas for the natural and human values that these areas provide. The Natural Areas Program mission is to preserve, restore and enhance the remnant Natural Areas and to promote environmental stewardship of these areas. In 1995, the San Francisco Recreation and Parks Commission approved the first SNRAMP. As described in Plans and Policies, p. 30, the SNRAMP is currently undergoing an update and contains detailed information on the biology, geology and trials within the designated areas. The SNRAMP also recommends actions and best management practices intended to guide natural resource protection, habitat restoration, trail and access improvements, other capital projects, and maintenance activities over the next 20 years. Maintenance and conservation activities are categorized based on management priorities and represent differing levels of sensitivity, species presence, and habitat complexity. The SNRAMP is currently under environmental review and is scheduled for adoption in 2014.

In light of the above, implementation of the draft ROSE Update would not result in significant impacts on any special-status species, sensitive natural community, or protected wetlands, and would not conflict with an adopted conservation plan.

Impact BIO-2: Implementation of the draft ROSE Update would not have a substantial adverse effect on any riparian habitat or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. (No Impact)

Wetlands and riparian areas provide habitat, biological benefits, and resource efficient methods for treating storm water runoff that often serve recreational users. Many of the City's wetlands have been buried by development and little of the original wetlands have survived. A number of

restoration projects have recently been completed or are underway, including Crissy field, Heron's Head, Pier 94 and the fresh and seasonal wetland at Lake Merced.

The state's authority in regulating activities in wetlands and waters resides primarily with the SWRCB. The SWRCB, acting through the SFBRWQCB, must certify that an U.S. Army Corps of Engineers (USACE) permit action meets state water quality objectives (CWA Section 401). Any condition of water quality certification is then incorporated into the Corps Section 404 permit authorized for a specific project. The SWRCB and SFBRWQCB also have jurisdiction over waters of the state under the Porter-Cologne Water Quality Control Act (Porter-Cologne). The SWRCB and SFBRWQCB evaluate proposed actions for consistency with the RWQCB's Basin Plan, and authorize impacts on waters of the state by issuing Waste Discharge Requirements (WDR) or in some cases, a waiver of WDR.

The San Francisco Bay Conservation and Development Commission (BCDC) has jurisdiction over coastal activities occurring within the San Francisco Bay Area. BCDC was created by the McAteer-Petris Act (California Government Code Sections 66600–66682). BCDC regulates fill, extraction of materials, and substantial change in use of land, water, and structures in San Francisco Bay and development within 100 feet of the Bay. BCDC has jurisdiction over all areas of the Bay that are subject to tidal action, including subtidal areas, intertidal areas, and tidal marsh areas that are between mean high tide and 5 feet above mean sea level. BCDC's permit jurisdiction does not extend to federally owned areas, such GGNRA lands, because they are excluded from state coastal zones pursuant to the Coastal Zone Management Act of 1972 (CZMA). However, the CZMA requires that all applicants for federal permits and federal agency sponsors obtain certification from the state's approved coastal program that a proposed project is consistent with the state's program. In San Francisco Bay, BCDC is charged with making this consistency determination.

As discussed above, the draft ROSE Update includes Policy 4.1, which states: "Protect, preserve and restore local biodiversity." The draft ROSE Update, p. 42, states: "The City should employ appropriate management practices to protect a well-balanced ecosystem which protects native species and preserves existing wildlife habitat... ... The long-term vision for the City should also include conserving and restoring hydrological resources, including riparian communities, seeps, springs, creeks, ponds, and lakes and exploring the feasibility of day lighting creeks that are completely or partially buried, ..."

Implementation of the draft ROSE Update would not have a substantial adverse effect on any riparian habitat or federally protected wetlands through direct removal, filling, hydrological interruption, or other means. In general, the draft ROSE Update policies call for identifying, mapping, preserving and in some instances day-lighting buried creeks where appropriate. Future projects that may affect wetland or riparian areas would require specific study and would be subject to review by agencies including, but not limited to, the USACE, SWRCB, SFBRWQCB and BCDC as appropriate.

Impact BIO-3: The draft ROSE Update would not interfere with the movement of native resident or wildlife species or with established native resident or migratory wildlife corridors. (Less than Significant)

Measures to Protect Migratory Birds

The MBTA of 1918 states that no person may "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention... for the protection of migratory birds... or any part, nest, or egg of any such bird (16 U.S.C. 703)."

In compliance with the MBTA, the RPD routinely implements measures to protect migratory birds and bird nests as part of construction projects. These measures require that: 1) a general preconstruction survey of the area be conducted by a qualified wildlife biologist; and 2) the construction schedule be developed or modified to work around predicted nesting activity to minimize the risk of conflict with the bird nesting season. When preconstruction surveys indicate "active" nests of protected birds are found in a tree slated for pruning or removal, the measures require that work on the tree be put on hold until the conclusion of the nesting season on August 15; and 2) a no-disturbance buffer be established around active nests during the breeding season, or until it is determined that all young have fledged.

Standards for Bird-Safe Buildings

There are approximately 400 resident and migratory species of birds in San Francisco, due to the diverse habitats of the Bay Area and its position on a coastal migration path known as the Pacific Flyway. In July 11, the San Francisco Board of Supervisors adopted the Standards for Bird-Safe Buildings ("Standards"). The Standards provide guidelines for evaluating the hazards posed to birds by window glazing and proximity to landscaping. These standards would apply, for example, to future clubhouses or other structures in parks or in areas where two "hazard triggers" are met: 1) location-related hazards where the siting of a structure creates increased risk to birds, and 2) feature-related hazards which may create increased risk to birds regardless of where the structure is located. Location-related hazards are created by structures that are near or adjacent to large open spaces and/or water.

The Standards identify designs that may pose hazards, and identify treatments that would provide safe buildings for birds. Buildings that pose the greatest hazard to birds are called bird-hazards and include those that:

- have a glass courtyard;
- have a transparent building corner;
- have a glazed passageway and/or sight lines through the building;
- clear glazed railings or bus shelters;
- clear-glass walls, greenhouse, or other clear barriers on rooftops or balconies; or

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 are located within or immediately adjacent to open spaces of more than one acre with lush landscaping, or immediately adjacent to open water, and with a façade of more than 35 percent glazing.

The features listed above are prohibited unless the building incorporates treatments to address a bird hazard. The following treatments are required for all bird-hazards:

- Glazing treatments: fritting, permanent stencils, frosted glass, exterior screens, physical grids placed on the exterior of glazing or UV patterns visible to birds. These treatments are required so that the amount of untreated glazing is reduced to less than 35 percent of the façade facing the landscaping or water for 100 percent of a bird trap (any of the first five characteristics listed above). Vertical elements of the pattern shall be at least ¼-inch wide with a maximum spacing of 4 inches, and horizontal elements shall be at least 1/8-inch wide with a maximum spacing of 2 inches. Equivalent treatments recommended by a qualified biologist may be used if approved by the Zoning Administrator. No glazing shall have a "Reflectivity Out" coefficient greater than 30 percent.
- Minimal lighting (limited to pedestrian safety needs) shall be used. Lighting shall be shielded.
- No uplighting should be used.
- The site must not use horizontal axis windmills or vertical axis wind generators that do not appear solid.

The draft ROSE Update is a policy document that does not include construction activities. Future project proposals that may result from the draft ROSE Update could require project-specific environmental review if the proposal has the potential to result in physical changes to the environment. With compliance with the MBTA and adherence to the City's Bird-Safe Building Standards, implementation of the draft ROSE Update would not adversely affect the movement of wildlife species.

Impact BIO-4: The draft ROSE Update would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Less than Significant)

The San Francisco Planning Department, DBI, and DPW have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees is implemented. The DPW Code Section 8.02-8.11 requires disclosure and protection of Landmark, Significant, and Street trees, collectively "protected trees" located on private and public

¹¹³ A "Street Tree" is any tree growing within the public right-of-way (e.g., sidewalk) that is not also a Landmark Tree. A "Landmark Tree" is a tree designated as such by the Board of Supervisors owing to particular age, size, shape, species, location, historical association, visual quality, or other contribution to the City's character. A "Significant Tree" is a tree that is planted on the subject property (i.e., outside of the public right-of-way) with any portion of its trunk within 10 feet of the public right-of-way that has: a) a diameter at breast height (DBH) in excess of 12 inches; or b) a height in excess of 20 feet; or c) a canopy in excess of 15 feet. Removal of Significant Trees on privately owned property is subject to the requirements for removal of Street Trees. As part of the determination to authorize removal of a Significant Tree, the Director of DPW is required to consider certain factors related to the tree, including (among

property. A Landmark Tree has the highest level of protection and must meet certain criteria for age, size, shape, species, location, historical association, visual quality, or other contribution to the City's character and have been found worthy of Landmark status after public hearings at both the Urban Forestry Council and the Board of Supervisors. A Significant tree is either on property under the jurisdiction of the DPW, or on privately owned land within 10 feet of the public-right-of-way which satisfies certain criteria. Street trees are trees within the public right-of-way or within the DPW jurisdiction. A Planning Department "Tree Disclosure Statement" must accompany all permit applications that could potentially impact a protected tree.

For trees on RPD property, tree removal is subject to established RPD procedures:114

- Emergencies: All trees posing an imminent hazard or posing a potential for disease transmission shall be mitigated, including potential removal without public notification.
- Golden Gate Park: Trees removed for the reforestation program shall not be posted for public review. During the course of work, each reforestation plot shall have an informal posting explaining the program and contact for further information. Golden Gate Park's reforestation plan has been documented for the last seventeen years [e.g., since 1980] and is included in the Park's Master Plan. Specimen, historical or significant trees removed for other than hazards shall be posted with high-visibility notices for 30 days. The notices shall include the reason for the removal, a comment period, proposed date of removal, and contact information. Tree removal shall recognize wildlife habitat, such as nesting birds.
- Neighborhood Parks and Squares: All tree removals in neighborhood parks and squares, for other than hazard abatement, shall be posted with high visibility notice for 30 days. The notices shall include the reason for the removal, a comment period, proposed date of removal, and contact information. Neighborhood association notification will also be conducted when applicable and to the extent feasible. The [Recreation and Park] Department will attempt to involve the community whenever a tree must be removed as to replacement specifics and location. Park construction projects shall include information on pending tree removals during community and meetings and mailings.

Existing ROSE Policy 2.9 states, "Maintain, and expand the urban forest." Draft Policy 3.6 states, "Maintain, restore, expand and fund the urban forest." Implementation of the draft ROSE Update would not conflict with existing tree preservation policies or ordinances, and this impact is considered less than significant.

Impact C-BIO: Implementation of the draft ROSE Update, combined with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative adverse impacts to biological resources. (Less than Significant)

others) its size, age, species, and visual, cultural, and ecological characteristics (Sections 810A(b) and 810A(c) of San Francisco Public Works Code).

¹¹⁴ Recreation and Parks Department, Tree Removal Procedures, Adopted July 31, 1997. This document is available for review at the Planning Department as part of Case File No. 2010.0641E.

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to biological resources. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹¹⁵ the 2012 Parks Bond,¹¹⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant biological impacts, and would not contribute to cumulative biological impacts. For the reasons discussed above, the proposed project's impacts related to biological resources, both individually and cumulatively, would be less than significant.

Тор	ics:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
14.		OLOGY AND SOILS— uld the project:					
a)	sub	oose people or structures to potential stantial adverse effects, including the risk of s, injury, or death involving:					
	i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)					
	ii)	Strong seismic ground shaking?			\boxtimes		
	iii)	Seismic-related ground failure, including liquefaction?					
	iv)	Landslides?			\boxtimes		
b)		ult in substantial soil erosion or the loss of soil?					

¹¹⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

¹¹⁶ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Тој	oics:	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
c)	Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in onor off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?					
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?					
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?					
f)	Change substantially the topography or any unique geologic or physical features of the site?			\boxtimes		

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Impact GE-1: The draft ROSE Update would not result in exposure of people and structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, expansive soils, seismic ground-shaking, liquefaction, lateral spreading, or landslides. (Less than Significant)

The General Plan's Community Safety Element contains maps that show areas of the City subject to seismic geologic hazards. The draft ROSE Update's policies and objectives would apply to parks, recreational facilities and open spaces, including spaces or facilities that are within areas subject to ground shaking from earthquakes along the San Andreas, Northern Hayward and other Bay Area faults. Because these parks, recreational facilities, and open spaces are located in a seismically active region, the potential exists for seismic-related ground failure. Some areas in the City may also be subject to seismic-related liquefaction or landslides. These areas generally include the Western Shoreline, Presidio, Northeastern Waterfront, Downtown, Mission Bay, SOMA, the Mission, Central Waterfront, Bayview-Hunters Point. This is due to the presence of artificial fill and the fact that the San Francisco Bay Area and surrounding areas are characterized by numerous geologically young faults. There are, however, no known fault zones or designated Alquist-Priolo Earthquake Fault Zones In or near the parks or open spaces to which the draft ROSE Update applies. Therefore, the draft ROSE Update would have no impact with respect to rupture of a known earthquake fault.

¹¹⁷ State of California Divisions of Mines and Geology, Map 4 – Seismic Hazard Study Zones – Area of Liquefaction Potential for San Francisco; San Francisco General Plan, Community Safety Element.

¹¹⁸ The Alquist-Priolo Earthquake Fault Zoning (AP) Act was passed into law following the destructive magnitude 6.6 San Fernando earthquake in 1971. The AP Act provides a mechanism for reducing losses from surface fault rupture on a statewide basis. The intent of the AP Act is to ensure public safety by prohibiting the siting of most structures for human occupancy across traces of active faults that constitute a potential hazard to structures from surface faulting or fault creep. Source: California Department of Conservation/Geological Survey website, http://www.consrv.ca.gov/cgs/rghm/ap/Pages/Index.aspx, accessed July 26, 2011.

Although the potential for seismic ground shaking and ground failure to occur within San Francisco is unavoidable, no structures or specific projects are proposed under the draft ROSE Update that would be constructed and could expose people to new seismic-related hazards. Draft ROSE Update Policies 1.1, 1.2, 1.3, 1.4, 2.1, 2.3, 2.4, 2.5, 2.9, 2.10, 3.1, and 3.2 could result in increased activities in some mapped hazard areas. While increased activities and new structures (e.g., potential clubhouses, recreation centers and the like) associated with implementing draft ROSE policies may occur in parks and open spaces, potential impacts would be offset with compliance with the San Francisco Building Code, Earthquake Hazards Reduction Act, Alquist-Priolo Earthquake Fault Zoning Act, and Seismic Hazards Mapping Act of 1990. The State of California provides minimum standards for building design through the California Building Code (CBC). The CBC regulates excavation, foundation and retaining walls. The CBC applies to building design and construction in the state and is based on the federal Uniform Building Code (UBC), used widely throughout the country. The CBC has been modified for California conditions with numerous, more detailed and/or more stringent regulations. The Code identifies seismic factors that must be considered in structural design.

Additionally, the Building Code includes regulations that would further reduce potential impacts, such as requiring compliance with the City's Code that contains specific provisions related to seismic hazards and upgrades. Compliance with the Building Code is mandatory for development in San Francisco. Throughout the permitting, design, and construction phases of a building project, Planning Department staff, DBI engineers, and DBI building inspectors confirm that the Building Code is being implemented by project architects, engineers, and contractors. During the design phase for future residential development, foundation support and structural specifications based on the preliminary foundation investigations would be prepared by the engineer and architect and would be reviewed for compliance with the Building Code by the Planning Department and DBI. Although some draft ROSE Update policies could potentially increase the effect of this hazard by increasing the intensity of parks and recreational facilities, DBI in its permit review process would ensure that buildings meet specifications for the protection of life and safety and all new development would be required to comply with the previously discussed federal, state, and local regulations. Therefore, the draft ROSE Update would have a less than significant impact with respect to the exposure of people to strong seismic ground shaking and seismic-related ground failure, including liquefaction, or landslides.

Impact GE-2: The draft ROSE Update would not result in substantial loss of topsoil, erosion or adverse impacts to topographical features. (Less than Significant)

Construction activities could result in impacts related to soil erosion and the loss of top soil, if future parks or improvements to recreational facilities and open spaces in the context of the draft ROSE Update would require substantial amounts of grading. This could result in erosion as well as potentially change the topography or any unique geologic or physical features.

Potential impacts would be offset by compliance with the California Building Standards Code and the San Francisco Building Code that include regulations that have been adopted to reduce impacts from grading and erosion. Compliance with the Building Code is mandatory for development in San Francisco. During the design phase for buildings, grading plans must be

prepared by the engineer and architect that would be reviewed by the Planning Department and Department of Building Inspection for compliance with the Building Code. Regulations that would further reduce erosion effects include compliance with (NPDES permits related to construction activities as administered by the San Francisco Bay Regional Water Quality Control Board. Under these regulations, a project sponsor must obtain a general permit through the NPDES Stormwater Program for all construction activities with ground disturbance of one acre or more. The general permit requires the implementation of best management practices to control erosion, including the development of an erosion and sediment control plan for wind and rain. Therefore, the draft ROSE Update would have a less-than-significant impact with respect to soil erosion or the loss of topsoil.

Impact GE-3: The draft ROSE Update would not locate recreational uses on geologic units or soils that are expansive, unstable, or that would become unstable as a result of future uses, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. (Less than Significant)

Construction of park, recreation and open space projects could occur in the context of the ROSE in the future and may result in impacts related to expansive soil if new recreational uses would be constructed on or near unstable areas. As discussed under Impact GE-1, the draft ROSE Update policies promote increasing intensity of use and making better use of existing facilities. Potential geotechnical and soils impacts would be offset by compliance with the previously discussed regulations, including those in the San Francisco Building Code. DBI, in its permit review process, would ensure that buildings meet specifications for the protection of life and safety. Therefore, the implementation of the draft ROSE Update would have a less-than-significant impact with respect to expansive soils, creating substantial risks to life or property.

Impact GE-4: The draft ROSE Update would not use septic tanks or alternative wastewater disposal systems, which would have soils incapable of adequately supporting them. (Not Applicable)

While the draft ROSE Update would not directly result in the construction of recreational facilities, potential future projects proposed in the context of the ROSE could be connected to the City's existing wastewater treatment and disposal system. No septic tanks or alternate wastewater disposal system are proposed. Therefore, the draft ROSE Update would have no impact with respect to septic tanks or alternative wastewater disposal systems.

Impact C-GE: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact on geology and soils. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to geology or soils. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of

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the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹¹⁹ the 2012 Parks Bond,¹²⁰ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would result in less-than-significant impact to topographical features, loss of topsoil or erosion, or risk or injury or death involving landslides, and would not have a considerable contribution to related cumulative impacts. For the reasons discussed above, the proposed project's impacts related to geology, soils, and seismicity, both individually and cumulatively, would be less than significant.

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
15.	HYDROLOGY AND WATER QUALITY—Would the project:					
a)	Violate any water quality standards or waste discharge requirements?					
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?					
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?					
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?					

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¹¹⁹ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

¹²⁰ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Тор	vics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
e)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?					
f)	Otherwise substantially degrade water quality?			\boxtimes		
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?					
h)	Place within a 100-year flood hazard area structures that would impede or redirect flood flows?					
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?					
j)	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?					

Impact HY-1: The draft ROSE Update would not violate water quality standards or otherwise substantially degrade water quality. (Less than Significant)

Construction of future projects that may be proposed in the context of the ROSE would be required to comply with federal, state, and local regulations that pertain to water quality. Groundwater that is encountered during construction is subject to the requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77), requiring that groundwater meet specified water quality standards before it may be discharged into the sewer system. Treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for its wastewater treatment plants.

San Francisco's combined sewer system is overseen by a comprehensive master plan adopted approximately 40 years ago. The sewer system has operated well but aging infrastructure, funding constraints, and deferred maintenance have created the need for another long-term master plan. In 2005, the SFPUC initiated a new master plan to develop a long-term strategy for management of the City's wastewater and stormwater, to provide a detailed roadmap for improvements needed over the next few decades and to estimate funds to implement these improvements, to address specific challenges facing the system, and to maximize system reliability and flexibility. The SFPUC is also preparing the Recycled Water Master Plan, which would guide implementation of recycled water projects that would reduce overall need for additional wastewater treatment. Additional regulations that would reduce potential impacts from polluted runoff include compliance with NPDES permits related to construction activities as administered by the SFBRWQCB and Article 4 of the Porter-Cologne Water Quality Act,

compliance with the Combined Sewer Overflow Control Policy and Total Maximum Daily Load standards as set forth by the Basin Plan. ¹²¹

Lastly, regulations incorporated into the San Francisco Green Building Ordinance address stormwater management by seeking to reduce impervious cover, promote infiltration, and capture and treat 90 percent of the runoff from an average annual rainfall event using acceptable Best Management Practices. These regulations require that projects on undeveloped sites would need to avoid any increase in runoff, while previously developed sites would be required to reduce runoff from existing amounts.

The draft ROSE Update policies and objectives would not conflict with existing policies, regulations or programs that pertain to water quality. As such, implementation of the draft ROSE Update would not substantially degrade water quality or contaminate a public water supply.

Impact HY-2: The draft ROSE Update would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge. (Less than Significant)

The City overlies all or part of seven groundwater basins. These groundwater basins include the Westside, Lobos, Marina, Downtown, Islais Valley, South San Francisco, and Visitation Valley basins. The Lobos, Marina, Downtown and South basins are located wholly within the City limits, while the remaining three extend south into San Mateo County. With the exception of the Westside and Lobos basins, all of the basins are generally inadequate to supply a significant amount of groundwater for municipal supply due to low yield. Local groundwater use has occured in small quantities in the City. For several decades groundwater has been pumped from wells located in Golden Gate Park and the San Francisco Zoo. Based on well operator estimates, about 1.5 mgd is produced by these wells. The groundwater is mostly used in the Westside Groundwater Basin by the RPD for irrigation in Golden Gate Park and at the Zoo. These wells are located in the North Westside Groundwater Basin. The California Department of Water Resources (DWR) has not identified this basin as over-drafted, nor as projected to be over-drafted in the future. Based on semi-annual monitoring, the groundwater currently used for irrigation and other non-potable uses in San Francisco meets, or exceeds, the water quality needs for these end uses.

Implementation of the draft ROSE Update would not directly result in the removal of water, either from the ground or other sources. However, construction of future projects that may be proposed as a result of the draft ROSE Update could result in impacts related to groundwater supplies if the development of future recreational facilities would require dewatering or result in groundwater drawdown or substantially reduce infiltration. Future proposals would be evaluated on a project-level basis considering location of development, depth of potential

¹²¹ The Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Quality Control Board's master water quality control planning document. It designates beneficial uses and water quality objectives for waters of the State, including surface waters and groundwater. It also includes programs of implementation to achieve water quality objectives. The Basin Plan has been adopted and approved by the State Water Resources Control Board, U.S. EPA, and the Office of Administrative Law where required.

^{122 2010} Urban Water Management Plan for the City and County of San Francisco, pg. 25, SFPUC, June, 2011.

groundwater, and type of construction being proposed. Proposals would be required to comply with existing regulations, including the SFPUC's Stormwater Design Guidelines. As such, the draft ROSE Update would result in less-than-significant effects related to groundwater.

Impact HY-3: The draft ROSE Update would not substantially alter the City's existing drainage patterns, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation. (Less than Significant)

The City contains many small creeks which historically ran from the east side of the City to the Bay, including Hayes Creek, Arroyo Delores, Mission Creek, Precita Creek, Islais Creek, and Yosemite Creek. The Presidio is home to Lobos Creek and Dragonfly Creek; Islais Creek runs through Glen Canyon and O'Shaughnessy Hollow. However, most of these creeks have been filled or run underground in culverts and are not free-flowing on the surface. There are no existing rivers in the City. Implementation of the draft ROSE Update would not result in any direct erosion effects or alter the course of a stream or river.

The potential for on-site erosion of exposed soil surfaces during construction activity is addressed in Impact GE-2. As described therein, future projects would comply with regulations related to runoff and grading, including the Stromwater Management Ordinance. As such, implementation of the draft ROSE Update would have less-than-significant effects related to erosion and siltation.

Impact HY-4: The draft ROSE Update would not expose people, housing, or structures to substantial risk of loss due to flooding. (Less than Significant)

Development in the City must account for flooding potential. Areas located on fill or bay mud can subside to a point at which the sewers do not drain freely during a storm (and sometimes during dry weather) and there can be backups or flooding near these streets and sewers. Portions of the City prone to flooding during storms, especially where a structure's ground-floors are located below an elevation of 0.0 City Datum or, more importantly, below the hydraulic grade line or water level of the sewer.

The City has implemented a review process to avoid flooding problems caused by the relative elevation of the structure to the hydraulic grade line in the sewers. Applicants for building permits for either new construction, change of use or change of occupancy, or for major alterations or enlargements are referred to the SFPUC for a determination of whether the project would result in ground-level flooding during storms. The side sewer connection permits for these projects need to be reviewed and approved by the SFPUC at the beginning of the review process for all permit applications submitted to the Planning Department, DBI, or the Successor Agency. The SFPUC and/or its delegate (SFDPW, Hydraulics Section) will review the permit application and comment on the proposed application and the potential for flooding during wet weather. The SFPUC will receive and return the application within a two-week period from date of receipt. The permit applicant shall refer to SFPUC requirements for information required for the review of projects in flood-prone areas. Requirements may include provision of a pump station for the sewage flow, raised elevation of entryways, and/or special sidewalk construction and the provision of deep gutters.

Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the USACE. The flood management agencies and cities implement the NFIP under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City does not participate in the NFIP and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City for the first time. FIRMs identify areas that are subject to inundation during a flood having a 1 percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the flood plain that is at risk from a flood of this magnitude as a special flood hazard area ("SFHA").

Because FEMA has not previously published a FIRM for the City, there are no identified SFHAs within San Francisco's geographic boundaries. FEMA has completed the initial phases of a study of the San Francisco Bay. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco for review and comment by the City. The City has submitted comments on the preliminary FIRM to FEMA. FEMA anticipates publishing a revised preliminary FIRM in 2012¹²³, after completing the more detailed analysis that Port and City staff requested in 2007. After reviewing comments and appeals related to the revised preliminary FIRM, FEMA will finalize the FIRM and publish it for flood insurance and floodplain management purposes.

FEMA has tentatively identified SFHAs along the City's shoreline in and along the San Francisco Bay consisting of Zone A (in areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).¹²⁴ On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new construction and substantial improvements in flood prone areas of San Francisco, and to authorize the City's participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally-backed flood insurance by FEMA. Once the City has reviewed the revised preliminary FIRM, FEMA will publish a final FIRM that will be used for floodplain management and flood insurance purposes. In the meantime, the City uses the Interim Floodplain Map to support the implementation of the Floodplain Management Ordinance.

Implementation of the draft ROSE Update would have a less-than-significant impact with regard to exposing people or structures to significant flooding risk. Future projects that may result from the draft ROSE Update would be subject to appropriate controls related to flooding. Therefore, the draft ROSE Update policies would result in less-than-significant effects related to flooding hazards.

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¹²³ San Francisco Floodplain Management Program Fact Sheet, Office of the City Administrator, Revised January 25, 2011. This document is available for review at the Planning Department in Case File 2010.0641E.

¹²⁴ City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf, accessed July 31, 2008.

Impact HY-5: The draft ROSE Update would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. (No Impact)

The draft ROSE Update includes Policy 2.10 that states, "Improve access to and level of activity provided at San Francisco reservoirs." Potential future projects that could be developed in the context of the ROSE could result in impacts related to flooding if parks and recreational facilities are placed near aboveground reservoirs and tanks. Dams and reservoirs which hold large volumes of water represent a potential hazard due to failure caused by ground shaking.

The SFPUC owns aboveground reservoirs and tanks within the City. It also monitors its facilities and submits periodic reports to DWR, Division of Safety of Dams, which regulates large dams. The City's largest reservoir is the Sunset Reservoir located in the Outer Sunset area. The reservoir includes a publicly accessible park around its perimeter and users in this area could potentially be subject to risk from flooding in the event of reservoir failure. The SFPUC has recently completed a seismic retrofit of the Sunset Reservoir. The north basin roof, columns and beams have been seismically reinforced and the earth embankment around the reservoir was stabilized to minimize risk from liquefaction. 125

Tsunamis (seismic sea waves) are long-period waves that are typically caused by underwater seismic disturbances, volcanic eruptions, or submerged landslides. Tsunamis, which travel at speeds up to 700 miles per hour, are typically only 1 to 3 feet high in open ocean water but may increase in height to up to 90 feet as they reach coastal areas, causing potentially large amounts of damage when they reach land. Low-lying coastal areas such as tidal flats, marshlands, and former Bay margins that have been artificially filled but are still at or near sea level are generally the most susceptible to tsunami inundation. Existing parks and recreational facilities, including Ocean Beach, the Presidio, Crissy Field, Marina Green, Aquatic Park, Justin Herman Plaza, Treasure Island, Candle Stick Point Recreation Area, and Sharp Park are located within mapped tsunami inundation areas. A seiche is an oscillation of a water body, such as a bay, which may cause local flooding. A seiche could occur on the San Francisco Bay due to seismic or atmospheric activity. Seiches can result in long-period waves that cause run-up or overtopping of adjacent landmasses, similar to tsunami run up. According to the historical record, seiches are rare.

Implementation of the draft ROSE Update would have a less-than-significant impact with regard to exposing people or structures to significant risk of loss, injury or death involving inundation by seiche, tsunami or mudflow. Objective 1 of the General Plan's Community Safety Element states: "Improve the coordination of City programs that mitigate physical hazards, help individuals and organizations prepare for and respond to disasters, and recover from the impacts

¹²⁵ Subsequent to the completion of the seismic upgrade the City and County engaged in a public-private partnership to install a 5 mega-watt solar array on the reservoir's roof. The solar array project was completed in December, 2010. Source: http://sanfrancisco.cbslocal.com/2010/12/07/massive-solar-project-at-sunset-reservoir-completed, accessed August 15, 2011.

¹²⁶ City and County of San Francisco Hazard Mitigation Plan, URS Corporation, http://www.sfdem.org/, accessed August 15, 2011.

¹²⁷ California Emergency Management Agency, California Geological Survey, Tsunami Inundation Maps for Emergency Planning, San Francisco West, North and East Quadrangles, California Department of Conservation, http://www.conservation.ca.gov/CGS/GEOLOGIC_HAZARDS/TSUNAMI/Pages/Index.aspx, accessed August 15, 2011.

of disasters." The draft ROSE Update policies would not conflict with or preclude the implementation of existing policies in the General Plan's Community Safety Element.

In the event that an earthquake occurred that would be capable of producing a tsunami that could affect San Francisco, the National Warning System would provide warning to the City. The San Francisco warning system (sirens and loudspeakers, tested each Tuesday at noon) would then be initiated, which would sound an alarm alerting the public to tune into local TV, cable TV, or radio stations, which would carry instructions for appropriate actions to be taken as part of the Emergency Alert System. Police would also canvas the neighborhoods sounding sirens and bullhorns, as well as knocking on doors if needed, to provide emergency instructions. Evacuation centers would be set up if required. The advance warning system would allow for evacuation of people, including those who may be in parks or using recreational facilities, prior to a seiche and would provide a high level of protection to public safety.

Therefore, impacts related to exposure of people to risk from inundation by seiche and tsunamis are considered less than significant.

Impact C-HY: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact on hydrology and water quality. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to hydrology or water quality. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹²⁸ the 2012 Parks Bond,¹²⁹ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would have less-than-significant impacts on hydrology and water quality, and the project's contribution to any cumulative impacts on hydrology or water quality would be less-than significant.

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¹²⁸ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

¹²⁹ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
16.	HAZARDS AND HAZARDOUS MATERIALS— Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?					
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?					
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?					
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?					
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?					⊠
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?					
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?					
h)	Expose people or structures to a significant risk of loss, injury or death involving fires?					

Because San Francisco International Airport is about 8 miles south of the City, topics 6e and 6f are not applicable.

Impact HZ-1: Implementation of the draft ROSE Update would not create a significant hazard through routine transport, use, disposal, handling, or emission of hazardous materials. (Less than Significant)

The draft ROSE Update would not directly create significant hazards, though implementation of future projects resulting from the draft ROSE Update may require the use of motor vehicles and

motorized equipment for the management of activities such as tree removal or pruning, erosion control and trail maintenance. Additionally, pesticides may be used as part of the Integrated Pest Management Plan. Aside from pesticides, hazardous materials used during the implementation of potential future projects could include fuel, oil, solvents, and lubricants used for equipment maintenance. Any activities involving hazardous materials and hazardous waste would be conducted in accordance with health and safety standards mandated by the Occupational Safety and Health Administration (OSHA) and included in the Pest Management Plan, reducing potential hazards to workers, the public and the environment from the use, transport, and disposal of those materials and wastes.

Impact HZ-2: Implementation of the draft ROSE Update would not create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than Significant)

In the past, asbestos, arsenic, polychlorinated biphenyls (PCBs), and lead were commonly used in play equipment, and in such materials as fireproofing, floor tiles, roofing tar, electrical transformers, elevators, fluorescent light ballasts, and paint. Therefore, older recreational buildings, clubhouses and other facilities may contain hazardous materials such as asbestos, PCBs and lead. The Planning Department, Department of Public Health (DPH), and other responsible agencies may require that a Phase I Environmental Site Assessment ("Phase I ESA") be prepared in conjunction with a future project that may result from the draft ROSE Update to determine the potential for hazardous materials to be present at, within, or beneath the surface of a building or a property. If the Phase I ESA determines a potential for hazardous materials or contamination to exist, further analysis ("Phase II Site Assessment") may be required. As part of a Phase II, soils or materials sampling may be required to test for the presence of hazardous materials. If such materials exist in a building when it is demolished or altered, or if soils are disturbed that may be contaminated, they could pose hazards to workers, neighbors, or the environment. The removal of hazardous building materials, including lead-based paint and asbestos, is regulated as described below by Chapter 34 of the San Francisco Building Code and Section 19827.5 of the California Health and Safety Code, respectively.

¹³⁰ The Integrated Pest Management Ordinance established the City's integrated pest management program for city properties in 1996. It requires an integrated approach to all pest control operations; establishes posting, record keeping and accountability requirements; and phased out the use of most hazardous pesticides. San Francisco Department of the Environment, accessed electronically on July 28, 2011 at: http://www.sfenvironment.org

Hazardous materials, as defined in Section 25501(h) of the California Health and Safety Code, are materials that, because of their quantity, concentration or physical or chemical characteristics, pose a substantial present or potential hazard to human health and safety if released to the workplace or to the environment.

¹³² Hazardous waste is defined as any material that is relinquished, recycled or inherently waste-like and falls under Title 22 of the California Code of Regulations, Division 4.5, Chapter 11 that contains regulations for the classification of hazardous wastes. A waste is considered hazardous if it is toxic (causes adverse human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damages materials), or reactive (causes explosions or generates toxic gases).

Arsenic

Arsenic is commonly used in wood treatment and preservatives as either Ammonium Copper Arsenate (ACA) or Chromated Copper Arsenate (CCA). CCA is the more prevalent; it is a mixture of three pesticide compounds containing arsenic, chromium, and copper. These watersoluble chemicals are used as wood preservatives for vacuum pressure treatment of dimensional lumber. Arsenic and Hexavalent Chromium are considered potential human carcinogens. The natural background level of arsenic in the soil of the San Francisco Bay Area is approximately 20 parts per million (ppm). The California Department of Toxic Substances (DTSC) and the USEPA classify materials containing arsenic at levels above 500 parts per million as hazardous waste, mandating disposal through regulations.

Public agencies have long considered the presence of arsenic in treated wood, including those on some RPD playground structures, and have presented them as low and insignificant risk materials. For reasons of general safety, public awareness, and the overall trend of replacing the play structures with more modern, painted metal structures, in 2003 the RPD set up a systematic program—the Arsenic-Hazard Assessment (A-HA) Program—to serve as a general scheme for prioritizing the long term replacement and/or maintenance of these structures. The RPD program assigns priorities (P1 through P6) for cleanup, removal, sealing and/or monitoring of play structures and other materials based on the sampled material, its sampled arsenic content, whether the material can be dislodged, whether the material is sealable, and the probability of hand-to-mouth contact. P1 priorities are for materials at the greatest risk of exposure to users, and they require cleanup or removal of materials, blocked access to children, and warnings to playground staff. P6 priorities are for materials that pose no reasonable risk for exposure, and they require only periodic monitoring. The RPD considers these ratings in the renovation of playgrounds that contain structures with pressure-treated wood.

The disposal of pressure-treated wood is regulated by California State agencies. Pursuant to the California Health and Safety Code (HSC) Sec. 25150.7 and 25150.8 as amended by Assembly Bill 1353 (2004), treated wood with arsenic levels greater than 500 ppm must be stabilized and disposed of as "hazardous waste." ¹³⁴ Although sealable, not ingestible, and given a P6 rating in the RPD A-HA program, the square and round posts of the playground were still found to contain arsenic levels higher than 500 ppm. Therefore, they would be required to be disposed of as hazardous waste.

HSC Sec. 251450.7(g)(2) requires that "any size reduction of treated wood waste is conducted in a manner that prevents the uncontrolled release of hazardous constituents to the environment, and that conforms to applicable worker health and safety requirements." In addition, "all sawdust and other particles generated during the size reduction are captured and managed as treated wood waste." The A-HA program therefore requires that sawing of timbers for waste disposal occurs off-site at a facility designated by the contractor. Such facilities shall include High-

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¹³³ SCA Environmental, Inc. Arsenic Guidance: Arsenic in Playstructures Response Ranking System. Oakland, CA, June 2003. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in File No. 2010.0641E.

¹³⁴ Western Wood Preserves Institute, Management of Treated Wood Products: Addendum for the Western United States, http://www.wwpinstitute.org/pdffiles/westernstatesdisp.pdf, accessed August 18, 2011.

efficiency particulate absorption (HEPA) attachment on all saws and a dust collection system. Where open cutting with chain saws will occur (offsite), the workers shall wear HEPA-filtered PAPRs. Workers should use polyethylene or canvas drop cloths extended from at least a 20-ft radius from the sawing activities to collect nuisance sawdust. Loose debris and materials shall be HEPA-vacuumed from the ground. Nearby landscaping and buildings, including HVAC vents shall be covered with polyethylene sheeting to prevent dust infiltration, as applicable. All collected saw dust will be disposed of as hazardous waste.

If sawing has to be done onsite, all sawing activities would have to be done within a negatively pressurized containment ducted to a HEPA-filtered unit (minimum 600 CFM). The containment will have to enclose the entire saw while allowing the saw operator to stay outside, and while trapping 100 percent of the sawdust. Burning of waste is not permitted. All collected saw dust will be disposed of as hazardous waste. The material must also meet the individual landfill's requirements for acceptance. Depending on the waste profile, concrete, sand and soils that surrounded the arsenic-treated wood may generally be disposed of as non-hazardous waste. Concrete materials are recycled, where feasible. Written notification to each receiving entity documents that it is fully aware of the presence of arsenic in the non-hazardous waste.

Subsequent projects that may result from the draft ROSE Update would be subject to project specific environmental review to determine whether they would result in the handling or disposal of pressure-treated wood and whether such wood has the potential to contain arsenic. In such an instance, adherence to the above measures would be required. Implementation of the draft ROSE Update would neither conflict with nor prelude RPD from implementing its program to regulate arsenic, and this impact is considered less than significant.

Asbestos

Asbestos-containing materials may be found within some of RPD or other City structures that could be renovated or demolished in the future in the context of implementing the draft ROSE Update. Section 19827.5 of the California HSC, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The California Legislature has vested the BAAQMD with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement. BAAQMD is to be notified ten days in advance of any proposed demolition or abatement work. Notification includes the names and addresses of operations and persons responsible; a description and location of the structure to be demolished or altered, including size, age, and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be used; procedures to be used to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations and would inspect any removal operation for which it has received a complaint.

The local office of the Occupational Safety and Health Administration must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14, where there is

asbestos-related work involving 100 square feet or more of ACM. Asbestos removal contractors must be certified as such by the Contractors State License Board. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a hazardous waste manifest that details the hauling of the material from the project site and the disposal of it. Pursuant to California law, the San Francisco DBI would not issue the required permit until the applicant has complied with the above notice requirements. Compliance with these regulations and procedures, already established as a part of the permit review process, would ensure that potential impacts of demolition due to asbestos would be reduced to a less than significant level.

Lead-based Paint

Recreational facilities that may be renovated in the future, resulting from the draft ROSE Update would be required to comply with Chapter 34, Section 3426, of the San Francisco Building Code, Work Practices for Lead-Based Paint (LPB) on Pre-1979 Buildings and Steel Structures. Chapter 34 requires specific notification and work standards and identifies prohibited work methods and penalties. This would apply where there is any work that may disturb or remove lead paint on any building built on or before December 31, 1978, or on any steel structures where LBP would be disturbed or removed and where exterior work would disturb more than 100 square feet or 100 linear feet of LBP.

Section 3426 applies to buildings or steel structures built before 1979, which are assumed to have LBP on their surfaces unless a certified lead inspector assessor tests surfaces for lead and determines it is not present, according to the definitions of Section 3426. The ordinance contains performance standards, including establishment of containment barriers at least as effective at protecting human health and the environment as those in the Department of Housing and Urban Development Guidelines (the most recent guidelines for evaluation and control of lead-based paint hazards). The ordinance also identifies prohibited practices that may not be used when disturbing or removing LBP. Any person performing work subject to the ordinance should, to the maximum extent possible, protect the ground from contamination during exterior work, should protect floors and other horizontal surfaces from work debris during interior work and should make all reasonable efforts to prevent migration of lead-paint contaminants beyond containment barriers during the course of the work. Cleanup standards require the removal of visible work debris, including the use of a high efficiency particulate air filter vacuum following interior work. Chapter 34, Section 3426, also includes notification requirements, information the notice should contain, and requirements for signs. Notification includes notifying project construction contractors of any paint-inspection reports that verify the presence or absence of LBP in the regulated area of the proposed project. Before work, the responsible party must provide written notice to the Director of DBI of the following:

- Location of the project;
- The nature and approximate square footage of the painted surface being disturbed or removed:
- Anticipated job start and completion dates for the work;
- Whether the responsible party has reason to know or presume that LBP is present;

- Whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any;
- The dates that the responsible party has or would fulfill any tenant or adjacent property notification requirements; and
- The name, address, telephone number, and pager number of the party who would perform the work.

Further notice requirements include posting signs when containment is required, the landlord notifying tenants of the impending work, the availability of a pamphlet about lead in the home, notice by contractor of the early commencement of work, and notice of lead-contaminated dust or soil, if applicable. The ordinance contains provisions regarding inspection and sampling for compliance by DBI and enforcement and describes penalties for noncompliance. The regulations and procedures established by the San Francisco Building Code would ensure that potential impacts from LBP disturbance during construction would be reduced to a level of insignificance. These regulations and procedures are already established as a part of the permit review process to further ensure their implementation. They would ensure that potential impacts of rehabilitation related to LBP would be reduced to a level of insignificance. Implementation of the draft ROSE Update would not conflict with the Building's Codes provisions that deal with LBP, and this impact is considered less than significant.

PCBs and Mercury

PCBs are regulated under federal and state law. Byproducts of PCB combustion are known carcinogens and are respiratory hazards, so specific handling and disposal of PCB-containing products is required. PCBs are most commonly found in lighting ballasts, wet transformers, and electrical equipment that uses dielectric fluids. PCBs are also occasionally found in hydraulic fluids.

Hazardous Soil and Groundwater

Future projects that may result from the draft ROSE Update may involve soil disturbance activities within a site that contains hazardous soils or groundwater. Depending on the location of such future projects and extent of the soil disturbing activities, the future projects would be subject to Article 22A of the Health Code, also known as the Maher Ordinance, which is administered and overseen by DPH. The Maher Ordinance requires the project sponsor to retain the services of a qualified professional to prepare a Phase I Environmental Site Assessment (ESA) that meets the requirements of Health Code Section 22.A.6. The Phase I would determine the potential for site contamination and level of exposure risk associated with the project. Based on that information, the project sponsor may be required to conduct soil and/or groundwater sampling and analysis. Where such analysis reveals the presence of hazardous substances in excess of state or federal standards, the project sponsor is required to submit a site mitigation plan (SMP) to DPH or other appropriate state or federal agency(ies), and to remediate any site contamination in accordance with an approved SMP prior to the issuance of any building permit or the commencement of any soil disturbing activities.

For departments, boards, commissions and agencies of the City that authorize construction or improvements on land under their jurisdiction where no building or grading permit is required, the ordinance requires protocols be developed between that entity and DPH that will achieve the environmental and public health and safety goals of Article 22A.

In light of the above, implementation of the draft ROSE Update would not result in a significant hazard to the public or environment from contaminated soil and/or groundwater and would result in a less than significant impact.

Impact HZ-3: Implementation of the draft ROSE Update would not substantially emit hazardous emissions or acutely hazardous materials to schools. (Less than Significant with Mitigation)

As discussed in HZ-1 above, the draft ROSE Update would not directly create significant hazards, though implementation of future projects that may result from the draft ROSE Update may require the use of motor vehicles and motorized equipment for the management of activities such as tree removal or pruning, erosion control and trail maintenance. The exact location and quantity of potential hazardous materials associated with future projects or management activities is unknown.

Although hazardous materials and waste generated from future projects of may pose a health risk to nearby schools, all businesses associated with housing construction that handle or involve on-site transportation of hazardous materials would be required to comply with the provisions of the City's Fire Code and any additional regulations as required in the California Health and Safety Code Article 1 Chapter 6.95 for a Business Emergency Plan, which would apply to those businesses associated with construction activities. Both the federal and state governments require all businesses that handle more than a specified amount of hazardous materials to submit a business plan to a regulating agency. In addition, implementation of federal and state regulations would minimize potential impacts by protecting schools from hazardous materials and emissions. For example, federal regulations such as Resource Recovery and Conservation Act would ensure that hazardous waste is regulated from the time that the waste is generated until its final disposal, and National Emission Standards for Hazardous Air Pollutants would protect the general public from exposure to airborne contaminants that are known to be hazardous to human health. San Francisco's Hazardous Materials Unified Program Agency is responsible for California Uniform Program Authority in the City and would require all businesses (including city contractors) handling hazardous materials to create a Hazardous Materials Business Plan which would reduce the risk of an accidental hazardous materials release.

Impact HZ-4: Implementation of the draft ROSE Update would not expose people or structures to a significant risk of loss, injury, or death involving fires and would not interfere with the implementation of an emergency response plan. (Less than Significant)

San Francisco ensures fire safety and emergency access within new and existing developments by its building and fire codes. Implementation of future projects that may result from the draft ROSE Update would conform to these standards, which may include development of an emergency procedure manual and an exit drill plan for specific developments, as applicable. Therefore, potential fire hazards would be addressed during the permit review process for a specific

undertaking. Conformance with these standards would ensure appropriate life safety protections for park and recreational facilities.

Implementation of the draft ROSE Update's policies and objectives would not conflict with existing laws, programs and practices geared toward regulating hazardous wastes. Future recreation, open space and park projects would be required to adhere to pertinent local, state and federal laws pertaining to hazardous materials use, transport, exposure, management and disposal. The draft ROSE Update would have a less-than-significant impact on hazards and hazardous materials.

Impact C-HZ: Implementation of the draft ROSE Update, in combination with past, present, and reasonably foreseeable future projects, would not have a substantial cumulative impact with hazards and hazardous materials. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to hazards and hazardous materials. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond, ¹³⁵ the 2012 Parks Bond, ¹³⁶ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would have less-than-significant impacts on hazards and hazardous materials. Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. Therefore, implementation of the draft ROSE Update would not contribute to cumulatively considerable significant effects related to hazards and hazardous materials. For the reasons discussed above, the proposed project's impacts related to hazards and hazardous materials, both individually and cumulatively, would be less than significant.

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¹³⁵ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

¹³⁶ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Topics:		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
17.	MINERAL AND ENERGY RESOURCES— Would the project:					
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?					
b)	Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?					
c)	Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?					

Impact ME-1: The draft ROSE Update would not result in the loss or availability of known mineral resources or locally-important mineral resource recovery sites. (No Impact)

All land in the City is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975. This designation indicates that there is inadequate information available for assignment to any other MRZ and therefore the City is not a designated area of significant mineral deposits. No area within the City is designated as a locally-important mineral resource recovery site. There are no known mineral resource sites at Sharp Park or Camp Mather.

Impact ME-2: The draft ROSE Update would not result in the use of large amounts of fuel, water or energy, or use these resources in a wasteful manner. (Less than Significant)

Future recreational uses that could be developed resulting from the draft ROSE Update would use energy produced in regional power plants using hydropower and natural gas, coal and nuclear fuels. New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for a building permit. Title 24 is enforced by DBI.

Pursuant to the San Francisco Green Building Ordinance (No. 180-08), all new municipal buildings in the City are required to obtain US Green Building Council Leadership in Energy and Environmental Design (LEED) Silver Certification. This certification system could require future projects to incorporate best management practices in sustainable site development, water savings, energy efficiency, materials selection and indoor environmental quality where feasible. Policy 4.3 of the draft ROSE Update calls for "Integrat[ing] the protection and restoration of local biodiversity into all open space construction, renovation, management and maintenance using environmentally sustainable design principles." In addition, Policy 4.4 of the draft ROSE Update

¹³⁷ California Division of Mines and Geology, Open File Report 96-03 and Special Report 146 Parts I & II.

states "Include environmentally sustainable practices in construction, renovation, management and maintenance of open space and recreation facilities."

Given that future projects would be required to adhere to Title 24 provisions as well as the Green Building Ordinance, implementation of the draft ROSE Update would have a less-than-significant impact on energy use.

Impact C-ME: Implementation of the draft ROSE Update, in combination with the past, present, and reasonably foreseeable future projects, would result in less than significant cumulative impacts to energy and minerals. (Less than Significant)

As of February 2014, there are no known past, present, or reasonably foreseeable projects in or near parks and open spaces under the jurisdiction of the RPD that would interact with the proposed project to result in cumulative significant impacts with respect to energy or minerals. Reasonably foreseeable future projects in or near parks and open spaces under the jurisdiction of the RPD include projects related to the 2008 Clean and Safe Parks Bond,¹³⁸ the 2012 Parks Bond,¹³⁹ the SNRAMP, and several athletic field renovations. These projects primarily involve renovation of existing parks and open spaces.

As a policy document, the ROSE would not directly result in physical impacts, and would not be expected to result in indirect impacts that would demonstrably contribute considerably to cumulative impacts from projects affecting or in the vicinity of open space and recreation resources. Implementation of the draft ROSE Update would have less-than-significant impacts on mineral and energy resources and would not contribute to any cumulative impact on mineral and energy resources. For the reasons discussed above, the proposed project's impacts related to mineral and energy resources, both individually and cumulatively, would be less than significant.

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Case No. 2010.0641E

¹³⁸ SFRPD. 2008 Clean and Safe Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2008-clean-safe-bond/. Accessed February 19, 2014.

¹³⁹ SFRPD. 2012 Parks Bond. Available online at: http://sfrecpark.org/park-improvements/2012-bond/. Accessed February 19, 2014.

Тор	ics:	Potentially Significant Impact	Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
envi (199 farm agen inve fore	AGRICULTURE AND FOREST RESOURCES: In definition mental effects, lead agencies may refer to the Call (7) prepared by the California Dept. of Conservation Inland. In determining whether impacts to forest resonates may refer to information compiled by the California of forest land, including the Forest and Range st carbon measurement methodology provided in Follould the project	ifornia Agricu as an optional urces, includir ornia Departm Assessment P	ultural Land Eval model to use in ng timberland, an ent of Forestry a roject and the Fo	uation and Sit assessing imp re significant e and Fire Protectorest Legacy A	e Assessme acts on agri nvironment tion regard ssessment p	nt Model culture and cal effects, lead ing the state's project; and
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?					
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?					
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?					
d)	Result in the loss of forest land or conversion of forest land to non-forest use?					
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest					

Less Than

Impact AG-1: The draft ROSE Update would not conflict with zoning for agricultural use, result in the loss of forest land, or otherwise convert farmland or forest land to non-agricultural or non-forest use. (No Impact).

The City is located within an urban area, which the California Department of Conservation's Farmland Mapping and Monitoring Program identifies as Urban and Built-Up Land, defined as "... land [that] is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes."

The project site does not contain agricultural uses and is not zoned for such uses. Implementation of the draft ROSE Update would not convert any prime farmland, unique farmland or Farmland of Statewide Importance to non-agricultural use. It would not conflict with existing zoning for agricultural land use or a Williamson contract, nor would it involve any changes to the environment that could result in the conversion of farmland. Accordingly, Initial Study Checklist Topics 17a, 17b, and 17c are not applicable to the ROSE Update.

use?

Тор	ics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
19.	MANDATORY FINDINGS OF SIGNIFICANCE—Would the project:					
a)	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?					
b)	Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			⊠		
c)	Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?					
As discussed above, the proposed project is anticipated to have only less-than-significant impacts in the environmental topics discussed. The proposed project would not result in a considerable contribution to any cumulatively significant impacts. In light of the above, the proposed project would not result in any significant impacts.						

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F. PUBLIC NOTICE AND COMMENT

The following is a summary of other public entities who have participated in the planning and policy development of the draft ROSE Update.

Open Space Task Force: In November 2007, the Mayor's Office launched the Mayor's Open Space Task Force. This Task Force was composed of over 80 landscape architects, open space advocates and residents from around the City. The Task Force met over the course of a year, concluding in January 2009, and developed emerging themes for action, which set the structure for the Open Space Framework.

City Roundtable: Led by the Mayor's Office, all City agencies with lands or responsibilities related to open space or recreation met regularly to share ideas, update each other on programs, and discuss future possibilities for the City's open space network. Participants include the DPW, Port, the Redevelopment Agency, the Unified School District, and others.

Working committees: Members of the Mayor's Open Space Task Force, as well as individuals representing specific open space perspectives, worked closely with staff in a series of working committees and focus meetings. These work groups meet in the interim of the larger Task Force meetings in order to compile Task Force outcomes and flesh out details on specific programs. They also looked at topics including Finance, Planning and Programming, Policy and Implementation, Natural Areas, Pedestrian and Bicycle Access, and others. The working committees created a number of specific policies, as well as recommendations for action.

Community workshops: The Neighborhood Parks Council (which has since merged with another organization and is called the Parks Alliance) and the City Open Space team spent three months meeting with neighborhoods and organizations throughout the City on the key goals of the Recreation and Open Space Plan. At each community workshop, citizens gave feedback on favorite open space(s) in San Francisco, pointed out opportunities for new open spaces in their neighborhood, and talked about what types of spaces, facilities, and programs were needed to enhance the open space experience in the City. Working in small groups, participants reported back on their priorities for open space moving forward in the future.

City Focus Groups and stakeholder meetings: The City also hosted a series of focus groups and meetings related to specific interests, e.g., youth, bicycle and pedestrian groups, natural areas, etc. City staff also had one-on-one meetings with interested parties throughout the process.

Public Hearings: City staff had publicly noticed meetings with the Parks and Recreation Open Space Advisory Committee, the Recreation and Parks Department Commission, the Historic Preservation Commission and the Planning Commission throughout this process.

G. DETERMINATION

On th	e basis of this Initial Study:			
\boxtimes	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.			
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.			
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.			
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.			
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.			
	DATE Felmany 24, 2014 King Jaces Sarah B. Jones Environmental Review Officer for			

John Rahaim

Director of Planning

H. INITIAL STUDY PREPARERS

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