



SAN FRANCISCO PLANNING DEPARTMENT

Addendum to Environmental Impact Report

Addendum Date: May 9, 2013
Case No.: 2005.0555E
Project Title: California Pacific Medical Center (CPMC) Long Range Development Plan
EIR: CPMC LRDP Final Environmental Impact Report (Final EIR)
SCH No. 2006062157, Certified April 26, 2012
Zoning: Various
Height and Bulk: Various
Block/Lot: Various
Lot Size: Various
Project Sponsor: California Pacific Medical Center
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1.0 INTRODUCTION AND BACKGROUND

This Addendum to the California Pacific Medical Center (CPMC) Long Range Development Plan (LRDP) Final Environmental Impact Report (Final EIR) describes the originally proposed CPMC LRDP that was analyzed in the Final EIR (referred to in this document as the “Previous Project”); provides a summary of subsequently proposed changes to the Previous Project (referred to in this document as the “Revised Project”); analyzes the Revised Project in the context of the previous environmental review; and summarizes the potential environmental effects that may occur as a result of implementing the Revised Project. The Final EIR, Case File No. 2005.0555E, was certified on April 26, 2012.¹

Since certification of the Final EIR, the Project Sponsor, CPMC, has proposed amendments to the LRDP (i.e., the Revised Project). The purpose of this Addendum to the CPMC LRDP Final EIR is to substantiate the Planning Department’s determination that no supplemental environmental review is required for the Revised Project, which includes modifications to the proposed hospitals at the Cathedral Hill Campus and St. Luke’s Campus, pursuant to California Environmental Quality Act (CEQA) Guidelines Sections 15162, 15163, and 15164². This is because this Addendum concludes that the environmental effects of

¹ San Francisco Planning Department, California Pacific Medical Center (CPMC) Long Range Development Plan, Final Environmental Impact Report. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2005.0555E. The Planning Commission certified the Final EIR and approved the project on April 26, 2012. The EIR Certification was appealed on May 16, 2012. The Board of Supervisors first heard the Appeal on July 17, 2012, and continued the Appeal Hearing to March 12, 2013. At the March 12, 2013 Board hearing, the Board unanimously voted to uphold the EIR Certification for this project and reject the EIR Appeal. During the pendency of the Appeal (i.e., between July 17, 2012 and March 12, 2013), the Project Sponsor (CPMC) revised the originally proposed LRDP (Previous Project) to include a smaller Cathedral Hill Campus and larger St. Luke’s Campus, relative to the Previous Project (Revised Project).

² CEQA Guidelines provisions regarding the preparation of a Subsequent EIR, Supplemental EIR, or Addendum to an EIR.

implementation of the Revised Project are fully covered and have been adequately analyzed pursuant to CEQA in the Final EIR previously prepared for the CPMC LRDP project, and that the analyses conducted and conclusions reached in the CPMC LRDP Final EIR continue to remain valid. The Revised Project would not result in any new significant environmental impacts not identified in the Final EIR, or result in a substantial increase in the severity of previously identified significant impacts, and no new, feasible project alternatives or mitigation measures considerably different from others previously analyzed have been identified that would clearly lessen the environmental impacts of the project, but that the Project Sponsor has declined to adopt. No changes have occurred with respect to circumstances surrounding the original CPMC LRDP project that would result in cumulative significant environmental impacts to which the Revised Project would contribute considerably, and no new information has been put forward which shows that the Revised Project would result in new or substantially more severe significant environmental impacts. Therefore, no supplemental environmental review is required for the Revised Project beyond this Addendum.

1.1 SUMMARY OF PREVIOUS PROJECT (CPMC LRDP)

The Previous Project analyzed in the Final EIR was CPMC's LRDP, a multi-phased plan to meet State seismic safety requirements for its hospitals; expand medical facilities and create a 20-year framework for CPMC's four existing medical campuses (Pacific Campus at Sacramento and Buchanan Streets, California Campus at Maple and California Streets, Davies Campus at Castro and 14th Streets, and St. Luke's Campus at Cesar Chavez and Valencia Streets); and for construction of a new medical campus (Cathedral Hill Campus at Van Ness Avenue and Geary Boulevard) in San Francisco. When completed, the proposed Cathedral Hill Campus would have allowed CPMC to consolidate existing acute-care and primary emergency services, and Women's and Children's Center at existing Pacific and California Campuses within the new Cathedral Hill Campus Hospital³, as well as to redevelop its existing campuses.

The CPMC LRDP included near-term and long-term Projects. The near-term Projects were the following:

(1) Cathedral Hill Campus included (a) demolition of the existing on-site vacant Cathedral Hill Hotel and 1255 Post Street office building and development of a new 15-floor, 265-foot-tall, 555-bed, 1,163,790-gross square foot (gsf) hospital with 513 underground parking spaces in a three-level below-grade parking; (b) demolition of seven existing, on-site vacant residential and commercial buildings and construction of a new 9-floor, 130-foot-tall, 496,278-gsf medical office building (MOB) (the Cathedral Hill Campus MOB) with 542 underground parking spaces, (c) an underground pedestrian tunnel beneath Van Ness Avenue connecting the new Cathedral Hill Campus MOB and new hospital; (d) conversion of the office uses within the 1375 Sutter Street office building to exclusively MOB use, (e) conversion of Cedar Street to two-way operation west of the Cathedral Hill Campus MOB garage access; and (f) various streetscape, sidewalk, and landscape improvements;

(2) St. Luke's Campus included (a) street vacation of a portion of San Jose Avenue between Cesar Chavez and 27th Streets and construction of a new five-floor, 99-foot-tall, 80-bed, 154,800-gsf St. Luke's Campus Hospital; (b) demolition of the existing on-site St. Luke's hospital tower and construction of a new five-floor, 100-foot-tall, 201,050-gsf St. Luke's Campus MOB with approximately 220 underground parking spaces in four basement levels on the site of the former (demolished) hospital tower, and (c) various streetscape improvements such as new entry plaza, courtyard, and pedestrian pathway; and

³ As used herein, the "Cathedral Hill Campus Hospital", "Cathedral Hill Campus MOB", "St. Luke's Campus Hospital", and "St. Luke's Campus MOB" refer to the same buildings as the "Cathedral Hill Hospital", "Cathedral Hill MOB", "St. Luke's Replacement Hospital", and "St. Luke's MOB/Expansion Building," as those terms are respectively used in the Final EIR.

(3) Davies Campus included construction of a new, four-floor, 40-foot-tall, 50,100-gsf Neuroscience Institute building on a portion of the campus at the corner of Noe Street and Duboce Avenue.

The long-term Projects at Davies Campus included demolition of the existing parking garage at 14th and Castro Streets and construction of a three-floor MOB in its place. The long-term Projects at Pacific Campus included demolition of certain existing on-campus buildings and construction of an underground parking garage, a nine-floor Ambulatory Care Center (ACC) Addition and a six-floor (plus top deck) parking garage. There are no near-term or long-term Projects proposed for California Campus. CPMC would sell California Campus by 2020 after relocation of its inpatient services to the new Cathedral Hill Campus Hospital and other services to Pacific Campus.

The proposed new Cathedral Hill Campus is within the RC-4 (Residential Commercial-High Density) Use District, NC-3 (Neighborhood Commercial, Moderate-Scale) Use District, Van Ness Special Use District (SUD), and Van Ness Automotive SUD; and 130-V and 130-E Height and Bulk Districts. The Pacific Campus is within the RM-1 and RM-2 (Low Density Residential, Mixed and Moderate Density Residential, Mixed, respectively) Use Districts; and 40-X and 160-F Height and Bulk Districts. The California Campus is within the RM-2 and RH-2 (Residential House, Two-Family) Use Districts; and the 80-E Height and Bulk District. The Davies Campus is within the RH-3 (Residential House, Three-Family) Use District; and the 65-D and 130-E Height and Bulk Districts. The St. Luke's Campus is within the RH-2 (Residential House, Two-Family) Use District; and 65-A and 105-E Height and Bulk Districts. The CPMC LRDP project required General Plan and Planning Code text and map amendments; General Plan referrals; Planned Unit Development (PUD) modifications and Conditional Use (CU) authorizations, addressing height, bulk, parking and permitted uses, and Office Allocations, among other approvals.

1.1.1 SUMMARY OF PROPOSED MODIFICATIONS TO PREVIOUS PROJECT

Compared to the Previous Project, the primary changes under the Revised Project include: the proposed Cathedral Hill Campus Hospital would be reduced by three floors, 39 feet, and 251 licensed beds, while the St. Luke's Campus Hospital would be increased by two floors, 43 feet, and 40 licensed beds. Other components of the proposed near-term projects under the LRDP, including but not limited to the MOB's at Cathedral Hill and St. Luke's Campuses, and the Neuroscience Institute at Davies Campus would remain unchanged under the Revised Project. In addition, all components of the proposed long-term projects under the LRDP at Pacific and Davies Campuses would remain unchanged under the Revised Project. As under the LRDP, there is no development proposed at California Campus and the Project Sponsor, CPMC, would sell the California Campus by 2020 after relocation of its inpatient services to the new Cathedral Hill Campus Hospital and other services to the Pacific Campus.

1.1.2 SUMMARY OF LRDP ENVIRONMENTAL REVIEW PROCESS

CPMC applied for environmental review of the LRDP on June 10, 2005. Pursuant to and in accordance with the requirements of Section 21094 of CEQA and Sections 15063 and 15082 of the CEQA Guidelines, the Planning Department, as lead agency, published and circulated a Notice of Preparation (NOP) on July 1, 2006, that solicited comments regarding the scope of the environmental impact report (EIR) for the LRDP. As planning for the LRDP continued, additional components were added to the LRDP, and revised Environmental Evaluation Applications (EEAs) were filed on February 28, 2008, and December 8, 2008. The NOP was revised and re-issued for a 30-day public review period on May 27, 2009. A public scoping meeting was held on June 9, 2009, to accept oral comments on the revised and refined LRDP proposal. In addition, the City and County of San Francisco (City) extended the public review period 30 days to July 26, 2009.

A total of 96 comment letters were received on the revised and re-issued NOP, in addition to the verbal comments received at the public scoping meeting. Commenters identified issues related to the following topics that would need to be evaluated in the Draft Environmental Impact Report (Draft EIR): Land Use and Planning; Aesthetics; Population and Housing; Cultural and Paleontological Resources; Transportation and Circulation; Noise; Air Quality; Greenhouse Gas Emissions; Wind and Shadow; Recreation; Public Services; Utilities and Service Systems; Geology and Soils; Hazards and Hazardous Materials; Demolition and Construction Effects; and Project Alternatives.

1.1.2.1 DRAFT ENVIRONMENTAL IMPACT REPORT

The Planning Department then prepared the Draft EIR, which described the LRDP and the environmental setting, analyzes potential impacts, identifies mitigation measures for impacts found to be significant or potentially significant, and evaluates alternatives to the proposed LRDP. In assessing construction and operational impacts of the Project, the Draft EIR considered the potential impacts of the LRDP on the environment, and the potential cumulative impacts associated with the proposed LRDP, in combination with other past, present, and future actions with potential for impacts on the same resources. The thresholds for determining the significance of impacts in the Draft EIR analyses were consistent with the environmental checklist in Appendix G of the CEQA Guidelines, which has been adopted and modified by the San Francisco Planning Department.

The Planning Department published the Draft EIR on July 21, 2010 which was circulated to local, state, and federal agencies, and to interested organizations and individuals for review and comment. The public review period was initially 60 days, but was extended to 90 days, ending on October 19, 2010. The Commission held a public hearing to solicit testimony on the Draft EIR during the public review period on September 23, 2010. A court reporter, present at the public hearing, transcribed the oral comments verbatim, and prepared written transcripts. The Planning Department also received written comments on the Draft EIR.

1.1.2.2 COMMENTS AND RESPONSES

The Planning Department then prepared the Comments and Responses (C&R) document. The C&R document was published on March 29, 2012, and includes copies of all of the comments received on the Draft EIR and written responses to each comment. The C&R provided additional, updated information, clarification and modifications on issues raised by commenters, as well as Planning Department staff-initiated text changes. The Final EIR, which includes the Draft EIR, the C&R document, an Errata Sheet, and all supporting information (including the appendices to the Draft EIR and C&R document), was reviewed and considered.

1.1.2.3 EIR CERTIFICATION

On April 26, 2012, the Planning Commission by Motion No. 18588, found that the Final EIR was adequate, accurate, and objective, reflected the independent judgment of the Planning Commission, and that the C&R document contained no significant revisions to the Draft EIR, certified the completion of the Final EIR for the Project in compliance with CEQA, and the CEQA Guidelines and Chapter 31 of the Administrative Code.

1.1.2.4 APPEAL AND PLANNING DEPARTMENT RESPONSES

On May 16, 2012, an appeal of Planning Commission Motion No. 18588 certifying the Final EIR was filed with the Clerk of the Board of Supervisors. The Planning Department submitted a detailed Appeal Response and Responses to Late Comments dated July 9, 2012. The Board of Supervisors held a duly

noticed hearing on July 17, 2012 to consider the appeal of the Final EIR certification. The Planning Department also submitted a supplemental memorandum on July 30, 2012 to the Board of Supervisors regarding issues raised at the July 17, 2012 appeal hearing.

All of the issues raised by Appellants in the May 16, 2012 appeal letter, and the Appellants' subsequent July 9, 2012 document submittal as well as in testimony to the Board at the July 17, 2012 appeal hearing, were either (1) previously raised by Appellants in the comments submitted on the Draft EIR and responded to in the C&R document dated March 29, 2012, or (2) raised in the later comment letters on the Draft EIR submitted to the Planning Commission on April 25, 2012, and April 26, 2012 and were addressed in the Planning Department's Appeal Response and Responses to Late Comments dated July 9, 2012, the supplemental Planning Department staff testimony and responses, including responses at the July 17, 2012, appeal hearing and the Planning Department's supplemental memorandum to the Board of Supervisors dated July 30, 2012.

On March 12, 2013, by adoption of Motion No. M13-042, the Board rejected the appeal and affirmed the decision of the Planning Commission to certify the Final EIR and found the Final EIR to be complete, adequate and objective, and reflecting the independent judgment of the Planning Department in compliance with CEQA, the CEQA Guidelines and Chapter 31 of the Administrative Code. On April 1, 2013, CPMC submitted a revised EEA reflecting the Revised Project.

Remarks

The environmental impacts of the development proposed under the Revised Project, the subject of this Addendum, were found to fall within the range of the impacts of the Previous Project and Alternative 3A as analyzed in the Final EIR, as discussed below under "Environmental Analysis." San Francisco Administrative Code Section 31.19(c)(1) states that a modified project must be reevaluated and that "[i]f, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefore shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter." CEQA Guidelines Section 15164 provides for the use of an addendum to document the basis for a lead agency's decision not to require a Subsequent or Supplemental EIR for a project that is already adequately covered in an existing certified EIR. The lead agency's decision to use an addendum must be supported by substantial evidence that the conditions that would trigger the preparation of a Subsequent EIR, as provided in CEQA Guidelines Section 15162, are not present.

The CPMC LRDP Final EIR concluded that the Previous Project would result in less-than-significant impacts in the following environmental topic areas: Land Use and Planning; Visual Quality and Urban Design; Population, Housing and Employment; Cultural Resources (Historic Architectural Resources); Wind and Shadow; Recreation; Utilities and Service Systems; Energy and Natural Resources; and Mineral and Energy Resources; and Agricultural and Forest Resources. The Final EIR found that potentially significant impacts of the Previous Project could be avoided or reduced to less-than-significant levels with mitigation measures incorporated in the following environmental topic areas: Cultural Resources (Archeological Resources); Public Services; Biological Resources; Geology and Soils; Hydrology and Water Quality; and Hazards and Hazardous Materials. The Final EIR found that implementation of the Previous Project would result in significant and unavoidable impacts in the following environmental topic areas: Transportation and Circulation; Noise; Air Quality; and Greenhouse Gas (GHG) Emissions.

The CPMC LRDP Final EIR concluded that Alternative 3A would result in less-than-significant impacts in the following environmental topic areas: Land Use and Planning; Visual Quality and Urban Design; Population, Housing and Employment; Cultural Resources (Historic Architectural Resources); Wind and

Shadow; Recreation; Utilities and Service Systems; Energy and Natural Resources; Mineral and Energy Resources; and Agricultural and Forest Resources. The Final EIR found that potentially significant impacts of Alternative 3A could be avoided or reduced to less-than-significant levels with mitigation measures incorporated in the following environmental topic areas: Cultural Resources (Archeological Resources); Public Services; Biological Resources; Geology and Soils; Hydrology and Water Quality; and Hazards and Hazardous Materials. The Final EIR found that implementation of Alternative 3A would result in significant and unavoidable impacts in the following environmental topic areas: Transportation and Circulation; Noise; Air Quality; and GHG Emissions.

As described in this Addendum under “Summary of Proposed Modifications to Previous Project” on page 3 above (and in more detail in Section 2.0, “Project Revisions,” starting on page 7 below), the Revised Project would involve mainly the following changes, compared to the Previous Project: the proposed Cathedral Hill Campus Hospital would be reduced by three floors, 39 feet, and 251 licensed beds, while the St. Luke’s Campus Hospital would be increased by two floors, 43 feet, and 40 licensed beds. The Previous Project was originally proposed, in part, to comply with the Alfred E. Alquist Hospital Facilities Seismic Safety Act of 1994, as amended, which requires all hospital facilities to meet new seismic standards and establishes a timeline for these improvements. These project objectives have not changed under the Revised Project. The Revised Project would still include substantially the same uses as the Previous Project, including a proposed new hospital at the Cathedral Hill Campus and a proposed replacement hospital at the St. Luke’s Campus, and associated medical buildings and garages, as described in the CPMC LRDP Final EIR. Other components of the proposed development under the Revised Project would remain as discussed in the CPMC LRDP Final EIR and except for changes to the timing of project phasing, no changes are proposed at the Davies, Pacific or California Campuses under the Revised Project, relative to the Previous Project.

This Addendum provides a three-way comparison of the Revised Project to the Previous Project and Alternative 3A that were previously analyzed in the CPMC LRDP Final EIR. As discussed below under “Comparison of Previous Project, Revised Project and Alternative 3A,” development proposed under the Revised Project is similar to that proposed under the EIR’s Alternative 3A at the Cathedral Hill and St. Luke’s Campuses except that: (1) the proposed Cathedral Hill Campus Hospital under the Revised Project would be taller (as discussed below) and have greater floor area, but would have fewer beds and a greater overall parking reduction compared to under Alternative 3A; (2) the St. Luke’s Campus Hospital would be taller under the Revised Project than the first-phase hospital in the same location under Alternative 3A; and (3) unlike Alternative 3A, which would include construction of a second phase Women’s and Children’s hospital building at the site of the existing (proposed to be demolished) St. Luke’s hospital tower and demolition of the Duncan Street parking garage for construction of a larger MOB, the Revised Project (similar to the Previous Project) would not include a second-phase hospital and instead would include construction of the St. Luke’s Campus MOB and retention of the Duncan Street parking garage, resulting in fewer beds and less total development or floor area at full build-out of the St. Luke’s Campus than under Alternative 3A.

This Addendum describes the potential environmental effects of the Revised Project compared to the impacts of the Previous Project and, where relevant, Alternative 3A identified in the EIR under “Environmental Analysis” below. It explains how the proposed modifications under the Revised Project would not result in any new significant environmental impacts or a substantial increase in the severity of previously identified environmental effects, and would not require any new feasible mitigation measures considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Project, but that the Project Sponsor has declined to adopt. This Addendum provides written documentation for the case record that the proposed modifications to the CPMC LRDP project (i.e., the Revised Project) do not warrant additional environmental review.

2.0 PROJECT REVISIONS

2.1 CATHEDRAL HILL CAMPUS

Table 2-1 shows the principal changes to the originally proposed Cathedral Hill Campus, which includes the following reductions: three floors (2 within the hospital tower and 1 within the podium, decreasing the building from 15 to 12 total floors) or 39 feet (decreasing the total height from 265 to 226 feet); 174,560 gsf (decreasing the total hospital floor area from 1,163,790 to 989,230 gsf⁴); and 251 beds (reducing the total from 555 to 304 beds) at the proposed hospital. The hospital's initial buildout would result in 274 available beds, with "shelled" space providing capacity for up to 30 additional beds in the future.

The Revised Project would reduce the originally proposed 265-foot-tall, 15-floor hospital tower by 39 feet or three floors, so that it would be a 226-foot-tall, 12-floor (plus two basement level) hospital tower under the Revised Project (see Figures 1-3 through 1-9). The building footprint and general design of the hospital under the Revised Project would remain the same as proposed for the Previous Project.

Because the site is sloped, the structure would vary in height relative to the side from which it is viewed. The proposed hospital's podium structure would range between four and five floors and range in height from 43 to 94 feet. Horizontal dimensions and the bulk of the project, both of the podium and tower, would remain within the development scope previously analyzed in the EIR. Under the Revised Project, the proposed Cathedral Hill Campus Hospital's exterior design would consist primarily of metal and glass, with stone and concrete at lower levels, as analyzed for the Previous Project in the EIR.

Many of the inpatient services currently offered at the Pacific and California Campuses would be relocated to the proposed Cathedral Hill Campus Hospital under the Revised Project, as they were under the Previous Project. As originally proposed, inpatient hospital beds would be located primarily in the bed tower, and invasive services, circulation, public entry, cafeteria and support services would be included in the podium. Some modification of department types, sizes, and locations would occur within the overall envelope of the building.

Under the Revised Project, the proposed Cathedral Hill Campus Hospital would continue to have three levels of at- or below-grade parking (the parking garage depth would range from 24 to 64 feet depending on the side of the site). The number of underground parking spaces would be reduced to reflect the smaller size of the proposed Cathedral Hill Campus Hospital under the Revised Project. The number of parking spaces within the hospital would be reduced by 237 spaces (decreasing the total from 513 to 276

⁴ The Project Description of the Revised Project in this Addendum is consistent with the project descriptions in the project approval documents being considered by the Planning Commission. In some cases, the gsf numbers cited in this Addendum vary from, and are greater than, those in the proposed CEQA Findings and other approval documents. The gsf numbers in this Addendum are based upon the same methodology used in the Final EIR, in order to facilitate a consistent comparison of the Revised Project to the Previous Project as analyzed in the Final EIR. The gsf numbers used in the project approval documents and CEQA findings differ from these numbers in some cases because, as part of the approval process for both the Previous Project and the Revised Project, Planning Department staff reviewed the gsf numbers under the methodology set forth in Planning Code Section 102.9 and further refined the total square footage numbers to reflect Planning Code gross square footage. The Planning Code gsf numbers, to the extent that they vary from those used in the Final EIR and Addendum, are smaller because the Planning Code methodology excludes some areas (such as certain areas within parking garages) that are within the building envelope and that were counted as building gsf for CEQA purposes in order to conservatively assume maximum gsf based on the physical building envelope. The Department had not determined the gsf numbers under the Planning Code methodology prior to publication of the Draft EIR and, therefore, those numbers were not available at the time that CEQA analysis of the Previous Project was undertaken. The figures used in the CEQA Findings and other approval documents reflect the Department's refined analysis. The variation in gsf is a result of that process, and does not reflect actual variation in building square footage, envelope, or program between the Revised Project as described in this Addendum and in the approval documents.

parking spaces). The amount of underground garage space within the hospital (and therefore the number or depth of basement levels and amount of excavation) would not change; however, less space would be dedicated to parking, as some mechanical, storage, and support functions originally proposed for other levels would be relocated to the underground levels. The Project Sponsor is studying the best way to achieve the reduction of 237 spaces on the campus and may ultimately propose to remove some or all of this parking from the proposed Cathedral Hill Campus MOB instead of/in addition to the hospital.

Ingress and egress points would remain as originally analyzed, as would "public realm" improvements surrounding the entire hospital block. The proposed Cathedral Hill Campus Hospital footprint and site plan, and the pedestrian and vehicle access and circulation would remain the same. No other changes are included in the proposed Cathedral Hill Campus under the Revised Project, including for the Cathedral Hill Campus MOB, Van Ness Avenue underground pedestrian tunnel (between the hospital and the MOB on the other side of Van Ness Avenue, at the lowest level (P3)), or 1375 Sutter MOB.

| Table 2-1 Cathedral Hill Campus: Project Summary Table | | |
|--|-------------------|------------------|
| Category under the LRDP (numbers for building uses below depict square footage) | Construction | |
| | Previous Hospital | Revised Hospital |
| Residential | — | — |
| Hotel | — | — |
| Retail | 3,100 | 2,540 |
| Office | — | — |
| Medical Office | — | — |
| Light Industrial | — | — |
| Parking—Structured | 244,900 | 133,380 |
| Medical Center | — | — |
| Hospital Administration | 12,100 | 39,240 |
| Cafeteria | 10,800 | 8,780 |
| Education/Conference | 14,690 | 39,460 |
| Inpatient Care | 388,100 | 199,570 |
| Skilled Nursing Care | — | — |
| Outpatient Care | 1,485 | 1,570 |
| Diagnostic and Treatment | 130,025 | 164,910 |
| Emergency Department | 19,900 | 24,530 |
| Support | 79,950 | 94,190 |
| Research | — | — |
| Other | — | — |
| Lobby | 9,200 | 17,290 |
| Building Infrastructure | 207,280 | 180,460 |
| Central Plant | 26,670 | 24,920 |
| Mechanical and Electrical | — | 45,370 |
| Loading | 15,590 | 13,020 |
| Total sq. ft. | 1,163,790 | 989,230 |
| Dwelling Units | — | — |
| Residential Hotel Rooms | — | — |
| Hotel Rooms | — | — |
| Parking Spaces—Structured | 513 | 276 |
| Parking Spaces—Surface | — | — |
| Loading Spaces | 6 + 14 vans | 6 + 14 vans |
| Height of Buildings | 265 | 226 |
| Number of Floors | 15 | 12 |
| Floors Underground | 2 | 2 |

2.2 ST. LUKE'S CAMPUS

The principal changes at the St. Luke's Campus are shown in Table 2-2 and include the following: an addition of two floors (increasing the total from five to seven floors) and 43 feet (increasing the total height from 99 to 142 feet); 80,890 gsf of hospital space (increasing the total hospital floor area from the previously planned 154,800 to 235,690 gsf); and 40 additional licensed acute care beds (increasing the total from 80 to 120 beds) at the proposed St. Luke's Campus Hospital. The 80,890 gsf of additional hospital space includes an approximately 5,049-gsf building connector between the St. Luke's Campus Hospital and St. Luke's Campus MOB, which was attributed to the St. Luke's Campus MOB under the Previous Project. However, the building connector would be attributed to the St. Luke's Campus Hospital building under the Revised Project. This is because under the Revised Project, the building connector would be constructed concurrently with the hospital rather than with the St. Luke's Campus MOB, resulting in a net addition of 75,841 gsf at the St. Luke's Campus under the Revised Project as compared to the Previous Project. There would be no change to the parking spaces and building footprints at the St. Luke's Campus as compared to the Previous Project. However, there would be an incremental increase in the number of vehicular trips due to the additional 75,841 gsf (and 40 more beds) of hospital development associated with the Revised Project. Although the footprint of the St. Luke's Campus Hospital would not change, there would be approximately 9,000 additional cubic yards of excavation below grade (increasing the total excavation at the St. Luke's Campus from 61,400 under the Previous Project to 70,400 cubic yards under the Revised Project). There would be no change in the number of basement levels.

The proposed St. Luke's Campus Hospital under the Previous Project that was analyzed in the Final EIR was a 5-floor, 99-foot-tall, 154,800-total-gsf building with 80 acute care beds. The total building height for the St. Luke's Campus Hospital under the Revised Project would be approximately seven floors and 142 feet tall, which is an increase of two floors and 43 feet, compared to the 99-foot-tall hospital tower under the Previous Project. The Revised Project's proposed 120-bed St. Luke's Campus Hospital would otherwise maintain the same above-grade footprint, bulk, and overall design characteristics as under the Previous Project.

Under the Revised Project, the proposed St. Luke's Campus Hospital's podium structure would range in height from approximately 47 to 60 feet, representing an approximately 7-foot increase in its mechanical screen height, compared to the podium structure under the Previous Project (which was 34 to 51 feet tall). Under the Revised Project, the above-grade horizontal dimensions and the bulk of the St. Luke's Campus Hospital (both of the podium and tower) and the hospital building footprint at grade would otherwise remain similar to those analyzed in the Final EIR for the Previous Project.

The two additional new hospital floors under the Revised Project would visually resemble the lower floors of the hospital under the Previous Project. The exterior design and architectural treatment of the two new floors would be similar to the design of the floors below and the same building façade materials would be used. Under the Revised Project, the St. Luke's Campus Hospital's exterior design would consist primarily of concrete, metal and glass, similar to the St. Luke's Campus Hospital design analyzed in the Final EIR for the Previous Project. Figures 1-30 through 1-32 includes elevations from each side of the campus. Figures 1-39 through 1-41 show a comparison of the North, South, East, and West Elevations of the hospital under the Previous Project to those of the Revised Project.

**Table 2-2
St. Luke's Campus: Project Summary Table**

| Category under the LRDP (numbers for building uses below depict square footage) | Construction | | | |
|---|---|--|--------------------------------------|-------------------------------------|
| | Previous St. Luke's Campus Hospital | Revised St. Luke's Campus Hospital | Previous St. Luke's Campus MOB | Revised St. Luke's Campus MOB |
| Residential | — | — | — | — |
| Hotel | — | — | — | — |
| Retail | — | — | 2,600 | 2,600 |
| Office | — | — | — | — |
| Medical Office | — | — | 31,820 | 31,820 |
| Light Industrial | — | — | — | — |
| Parking—Structured | — | — | 111,000 | 111,000 |
| Hospital Administration | 3,200 | 3,200 | 2,080 | 2,080 |
| Cafeteria | 1,800 | 1,970 | 1,560 | 1,560 |
| Education/Conference | 1,000 | 1,920 | 1,560 | 1,560 |
| Inpatient Care | 65,200 | 87,860 | | — |
| Skilled Nursing Care | — | — | — | — |
| Outpatient Care | — | — | 8,680 | 8,680 |
| Diagnostic and Treatment | 18,700 | 43,910 | 22,460 | 22,460 |
| Emergency Department | 11,500 | 13,940 | | — |
| Support | 15,900 | 26,570 | 3,640 | 3,640 |
| Research | — | — | | — |
| Other | — | — | | — |
| Lobby | 6,300 | 5,400 | 520 | 520 |
| Building Infrastructure | 19,800 | 35,180 | 15,130 | 10,081 ¹ |
| Central Plant | 2,900 | 7,660 | — | — |
| Mechanical and Electrical Floors | — | — | — | — |
| Loading | 8,500 | 8,080 | — | — |
| Total sq. ft. | 154,800 | 235,690 | 201,050 | 196,001 |
| Dwelling Units | — | — | — | — |
| Hotel Rooms | — | — | — | — |
| Parking Spaces—Structured | — | — | 220 | 220 |
| Parking Spaces—Surface | — | — | — | — |
| Loading Spaces | — | — | — | — |
| Number of Buildings | — | — | 1 | 1 |
| Height of Buildings | 99 | 142 | 100 | 100 |
| Number of Floors | 5 | 7 | 5 | 5 |
| Floors Underground | — | — | 4 | 4 |

Note:

¹ Connector area of 5,049 gsf moved from MOB to Hospital.

The St. Luke's Campus Hospital tower under the Revised Project would be about 235,690 gsf in size and have a total of 120 acute care beds. This represents about 75,841 gsf of additional hospital tower space and an additional 40 licensed acute care beds that would be accommodated on the two additional floors (see Figures 1-33 through 1-34). Inpatient beds within the hospital would still be located primarily in the bed tower, and invasive services, Emergency Department, circulation, public entry, cafeteria and support services would remain in the podium. However, some modification of department types, sizes, and locations would occur within the overall envelope of the building under the Revised Project, compared to the Previous Project.

In order to accommodate needed hospital podium space on the constrained site, up to approximately 5,500 square feet (sq. ft.) of below-grade space would be added to the hospital, in the area directly beneath the emergency ambulance bays and extending along 27th Street to the south (see Figure 1-28). This additional excavated area would not change the above-ground site plan for St. Luke's Campus under the Revised Project, compared to the Previous Project. The additional excavated volume totals approximately 9,000 cubic yards beyond the 61,400 cubic yards estimated for the St. Luke's Campus Hospital and St. Luke's Campus MOB under the Previous Project.

The project construction phasing would also change slightly under the Revised Project, so that the 5,049 square foot development serving as a building connector between the hospital and St. Luke's Campus MOB would be built as part of the initial hospital phase at the St. Luke's Campus under the Revised Project, versus the later St. Luke's Campus MOB phase under the Previous Project (see Figure 1-28). Under the Revised Project, the connector would need to be built concurrently with the hospital to allow expanded hospital programs to occupy the connector space. In addition, as a result of programming changes for the St. Luke's Campus Hospital, the plaza originally proposed to be built as a separate phase from the St. Luke's Campus Hospital under the Previous Project, would be built during the same phase as the hospital under the Revised Project. Table 2-2 therefore reflects both the increase in square footage/floor area and the transfer of the plaza and connector components of the St. Luke's Campus from the later St. Luke's Campus MOB development phase (under the Previous Project) to the earlier St. Luke's Campus Hospital development phase (under the Revised Project).

Other than the fact that the connector and plaza between the St. Luke's Campus Hospital and St. Luke's Campus MOB would be constructed earlier than previously proposed, the site plan, parking, pedestrian and vehicle access and circulation for St. Luke's Campus under the Revised Project would remain the same as with the Previous Project. Ingress and egress points would remain as originally analyzed, as would the "public realm" improvements surrounding the entire hospital block.

No changes are proposed for the new St. Luke's Campus MOB, 1912 Building, Monteagle Medical Center, or Hartzell Building under the Revised Project. No other changes are proposed at the St. Luke's Campus under the Revised Project.

2.3 DAVIES, PACIFIC, AND CALIFORNIA CAMPUSES

No changes from the Previous Project are proposed for any other CPMC Campus or component of the Previous Project. Other than the timing of project phasing, no changes are proposed at the Davies, Pacific or California Campuses relative to the Previous Project. A Revised Project schedule is included in this Addendum at the end of Section 2.0 (as Table 2-7).

2.3.1 COMPARISON OF PREVIOUS PROJECT, REVISED PROJECT, AND ALTERNATIVE 3A

A description of the Revised Project's components that are being modified from the Previous Project and how they compare to the Previous Project and Alternative 3A (at Cathedral Hill and St. Luke's Campuses) follows. Tables 2-3 through 2-6 below provide a comparison of development at the Cathedral Hill and St. Luke's Campuses under the Revised Project to the Previous Project and Alternative 3A.

Development proposed under the Revised Project is similar to that proposed under the EIR's Alternative 3A at the Cathedral Hill and St. Luke's Campuses, except for the following:

Compared to Alternative 3A, the proposed Cathedral Hill Campus Hospital under the Revised Project would be taller (96 feet or three floors taller) and have greater floor area (by about 166,437 gsf), but would have 96 fewer beds and a greater overall parking reduction (15 fewer parking spaces). The proposed Cathedral Hill Campus Hospital under the Revised Project has been organized differently than the Cathedral Hill Campus Hospital envisioned under Alternative 3A. The design of the proposed Cathedral Hill Campus Hospital under Alternative 3A was preliminary with respect to hospital programming and was designed to achieve a "code-complying" height. Therefore, the Alternative 3A hospital design resulted in a uniform, box-like, 130-foot tall structure. Under the Revised Project, the design for the proposed Cathedral Hill Campus Hospital is a reduced version of the podium and tower hospital design proposed under the Previous Project.

The first phase hospital at the St. Luke's Campus would be taller (26 feet or 1 story taller) under the Revised Project than under Alternative 3A. Unlike Alternative 3A, which would subsequently involve construction of a second phase Women's and Children's hospital building (289,900 gsf, 116 feet or six floors tall) at the site of the existing (proposed to be demolished) St. Luke's hospital tower and would involve the demolition of the Duncan Street parking garage to construct a larger MOB, the Revised Project (similar to the Previous Project) would not include a second phase hospital building and instead would include construction of the St. Luke's Campus MOB at the site of the existing hospital tower (proposed to be demolished) and retention of the Duncan Street parking garage, resulting in 120 fewer beds and less total development (about 220,157 fewer gsf) at full buildout of the St. Luke's Campus than under Alternative 3A.

Table 2-3 and Table 2-4 provide a comparison of the Previous Project, Revised Project, and Alternative 3A at the Cathedral Hill and St. Luke's Campuses. Table 2-5, Site Usage Comparison, provides a comparison of project site usage under the Previous Project and the Revised Project, and Table 2-6, Parking Comparison, provides a comparison of parking spaces provided under the Previous Project, Revised Project, and Alternative 3A at the Cathedral Hill St. Luke's Campuses.

Table 2-3
Comparison of the Previous Project, Alternative 3A, and the Revised Project – Cathedral Hill Campus

| Project Component | Previous Project | Alternative 3A | Revised Project |
|--------------------------------|---|---|---|
| Cathedral Hill Campus Hospital | The proposed Cathedral Hill Campus Hospital would be 1,163,798 gsf and contain 555 licensed acute care beds. The proposed hospital would reach 15 floors and 265 feet in height. The exterior design would consist primarily of metal and glass, with stone and concrete. | Under Alternative 3A, the proposed Cathedral Hill Campus Hospital would be 166,437 gsf smaller in size than under the Revised Project and 340,997 gsf less than the Previous Project and would include 96 more beds than the Revised Project. The hospital would also be 96 feet and three floors shorter than under the Revised Project. | While all other features would remain the same as the Previous Project, the Revised Project would eliminate approximately 174,560 gsf with a total reduction of three floors (two in the tower, one in the podium). The Revised Project hospital would be 39 feet shorter than the Previous Project and include 251 fewer licensed beds, for a total of 304 beds. The hospital footprint would remain the same, and no changes are proposed to the exterior design, except for the reduction of three floors. |
| Cathedral Hill Campus MOB | The proposed Cathedral Hill Campus MOB would be 496,278 gsf and include 542 structured parking spaces in a 9-floor, 130-foot-tall building. | Same as Previous Project and Revised Project. | Same as Previous Project. |
| Parking Garages | The proposed Cathedral Hill Campus MOB would contain 542 structured parking spaces. | Same as Previous Project and Revised Project. | No changes to the proposed Cathedral Hill Campus MOB parking garage (542 spaces), ¹ compared to Previous Project. |
| | The proposed Cathedral Hill Campus Hospital would contain 513 structured parking spaces. | Under Alternative 3A, 15 more parking spaces would be provided at the proposed Cathedral Hill Campus Hospital than under the Revised Project (291 total parking spaces under Alternative 3A versus 276 parking spaces under Revised Project). | Underground area and excavation for the proposed Cathedral Hill Campus Hospital would remain the same, but number of parking spaces would be reduced by 237 spaces, for a total of 276 spaces. The remainder of below-grade space would be dedicated to other uses such as mechanical, storage, and support functions. |
| Vehicular Access | The proposed Cathedral Hill Campus Hospital vehicular access would be available along Post Street (from the west) and Geary Boulevard (from the east). Loading and | Same as Previous Project and Revised Project. | Same as Previous Project. |

**Table 2-3
Comparison of the Previous Project, Alternative 3A, and the Revised Project – Cathedral Hill Campus**

| Project Component | Previous Project | Alternative 3A | Revised Project |
|-------------------|---|---|---------------------------|
| | emergency access would be accessible from Franklin Street (from the south). The proposed Cathedral Hill Campus MOB vehicular/loading access would be available along Cedar Street (from the west) and Geary Street (from the east). | | |
| Pedestrian Access | Pedestrian access at the proposed Cathedral Hill Campus Hospital would be from the main entrance on Van Ness Avenue. Secondary pedestrian access would be from Post Street. Pedestrian access at the proposed Cathedral Hill Campus MOB would be from the main entrance on Van Ness Avenue. | Same as Previous Project and Revised Project. | Same as Previous Project. |

Note:

¹ Project Sponsor may elect, however, to achieve campus parking reduction by removal of MOB parking spaces.

**Table 2-4
Comparison of the Previous Project, Alternative 3A, and the Revised Project – St. Luke's Campus**

| Project Component | Previous Project | Alternative 3A | Revised Project |
|----------------------------|---|---|---|
| St. Luke's Campus Hospital | The proposed St. Luke's Campus Hospital would contain 154,800 gsf and 80 licensed acute care beds. The hospital would be five floors and 99 feet in height. The proposed hospital would also include an excavation of approximately 61,400 cubic yards. | The first phase hospital at the St. Luke's Campus under Alternative 3A would be 77,790 gsf smaller than under the Revised Project. Under Alternative 3A, the first phase of the hospital would also be 27 feet and one story shorter in height, and include 40 fewer beds than under the Revised Project. The second phase Women's and Children's Hospital at the St. Luke's Campus under Alternative 3A, which would not be constructed under the Revised Project, would include an additional | While all other above ground features would remain the same as the Previous Project, the Revised Project would add a further 75,841 gsf in the patient tower, accommodated on two additional floors. In addition, the 5,049 connector area between the proposed new St. Luke's Campus Hospital and St. Luke's Campus MOB would now be constructed as part of the hospital, rather than the MOB, for a total of 235,690 gsf within the hospital. The Revised |

Table 2-4
Comparison of the Previous Project, Alternative 3A, and the Revised Project – St. Luke's Campus

| Project Component | Previous Project | Alternative 3A | Revised Project |
|-----------------------|---|---|--|
| | | 289,900 gsf and 160 beds (for a total of 120 more beds at the St. Luke's Campus under Alternative 3A than under the Revised Project), and would be six floors and 116 feet in height. A greater amount of excavation would occur under Alternative 3A than under either the Previous Project or the Revised Project, due to increased development at the St. Luke's Campus, as described above. | Project hospital would be 43 feet taller than the Previous Project and include 40 additional licensed acute care beds, for a total of 120 beds. The new floors would be architecturally and visually consistent with the proposed floors analyzed under the Previous Project. The hospital's footprint at grade would remain the same, but an additional 9,000 cubic yards of excavation below grade are proposed. |
| St. Luke's Campus MOB | The proposed St. Luke's Campus MOB would contain 201,050 gsf with a height of 100 feet and five floors. It would also include 220 underground parking spaces. | Under Alternative 3A, the St. Luke's Campus MOB/would not be constructed at the site of existing St. Luke's hospital tower. Instead, the Duncan Street Parking Garage would be demolished and, as a third phase of construction, a larger, 427,653 gsf medical office building with additional parking (for a total of 267 more parking spaces at the St. Luke's Campus than under the Revised Project) would be constructed in its place. The height and number of floors of the medical office building under Alternative 3A would be the same as the St. Luke's Campus MOB under the Revised Project, but the building footprint would be larger and there would be three additional underground parking levels. | Same as the Previous Project, except for reduction in St. Luke's Campus MOB building size to 196,001 gsf, due to construction of 5,049-gsf connector area as part of the proposed hospital, instead of the MOB. |
| Parking Garage | The proposed St. Luke's Campus MOB would include 220 structured parking spaces. The existing Duncan Street Parking Garage would be retained. | Duncan Street parking garage would be demolished and the larger MOB under Alternative 3A would provide more parking spaces than proposed to be provided | Same as the Previous Project. |



















**Table 2-4
Comparison of the Previous Project, Alternative 3A, and the Revised Project – St. Luke's Campus**

| Project Component | Previous Project | Alternative 3A | Revised Project |
|-------------------|---|---|-------------------------------|
| | | by the St. Luke's Campus MOB under the Revised Project. Overall, a total of 267 more parking spaces at the St. Luke's Campus under Alternative 3A than under the Revised Project. | |
| Vehicular Access | Vehicular access to the St. Luke's Campus would be provided from Cesar Chavez Street and Valencia Street to the proposed St. Luke's Campus MOB. Existing vehicular access from San Jose Avenue to the Duncan Street Parking Garage would be retained. Emergency vehicle access would be obtained from 27th Street. Vehicular access to the loading dock would be obtained from Cesar Chavez Street. | Vehicular access to the St. Luke's Campus would be provided from Cesar Chavez Street and from Valencia Street to the Women's and Children's Hospital. Vehicular access to the new MOB Parking Garage would be provided from San Jose Avenue. Vehicular access to the loading dock would be provided from 27th Street and San Jose Avenue. Emergency vehicle access to the hospital at the St. Luke's Campus would be provided from Cesar Chavez Street. | Same as the Previous Project. |
| Pedestrian Access | Pedestrian access under the Previous Project would be available from Cesar Chavez Street, San Jose Avenue, Duncan Street, and Valencia Street, but the existing stairs leading up to the 1912 Building from Valencia Street would not be in use. | Same as Previous Project and Revised Project. | Same as the Previous Project. |

| Table 2-5 Site Usage Comparison | | | | | | |
|---|--------------------------------|----------------|-----------------|----------------------------|-----------------------------|-----------------|
| | Cathedral Hill Campus Hospital | | | St. Luke's Campus Hospital | | |
| | Previous Project | Alternative 3A | Revised Project | Previous Project | Alternative 3A ² | Revised Project |
| Total Beds ¹ | 555 | 400 | 304 | 80 | 240 | 120 |
| Approximate GSF | 1,163,790 | 822,793 | 989,230 | 154,800 | 447,800 | 235,690 |
| Building Height (feet) | 265 | 130 | 226 | 99 | 115 and 116 | 142 |
| Building Height (floors) | 15 | 9 | 12 | 5 | 6 | 7 |
| +/- from Beds | (251 beds) | (96 beds) | - | +40 beds | (120 beds) | - |
| +/- from GSF | (174,560 gsf) | +166,437 gsf | - | +80,890 gsf | (212,110 gsf) | - |
| +/- from Building height | (39 feet) | +96 feet | - | +43 feet | +26 to 27 feet | - |
| +/- from Building floors | (3 floors) | +3 story | - | +2 floors | +1 story | - |
| Note: Numbers in parentheses represent negative values. ¹ Total buildout of CPMC LRDP under the Revised Project would have 692 beds, compared to 903 beds under the Previous Project. ² 75,841 additional gsf would be added to the St. Luke's Campus Hospital. The remaining 5,049 gsf is attributable to the connector area that would have been constructed as part of the St. Luke's Campus MOB under the Previous Project, but would be constructed during the same phase as the hospital under the Revised Project. Source: CPMC, AECOM, 2013. | | | | | | |

| Table 2-6 Parking Comparison | | | |
|---|------------------|----------------|-----------------|
| | Previous Project | Alternative 3A | Revised Project |
| Cathedral Hill Campus Hospital Parking Garage | 513 | 291 | 276 |
| Cathedral Hill Campus MOB Parking Garage | 542 | 542 | 542 |
| 1375 Sutter Street Conversion | 172 | 172 | 172 |
| Cathedral Hill Campus Total | 1,227 | 1,005 | 990 |
| St. Luke's Campus MOB Parking Garage | 220 | 702 | 220 |
| Duncan Street Garage | 215 | - | 215 |
| Off-street Surface Parking | 15 | - | 15 |
| St. Luke's Campus Total | 450 | 702 | 450 |
| Source: CPMC, AECOM, 2013 | | | |

**Table 2-7
CPMC Long Range Development Plan Schedule**

| | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 | 2025 |
|---|------|--|--|------|------|------|---|---|---|---|------|------|------|
| Cathedral Hill Campus (All Project-Level) | | | | | | | | | | | | | |
| Hospital (New 304 bed) | |  | | | | | | | | | | | |
| Tunnel Under Van Ness (New) | |  | | | | | | | | | | | |
| Medical Office Building (New) | | |  | | | | | | | | | | |
| 1375 Sutter Street-Medical Office Building- Conversion/Renovation | |  | | | | | | | | | | | |
| Pacific Campus (All Program-Level) | | | | | | | | | | | | | |
| 2018 Webster Street - Conversion/Renovation | | | | | | |  | | | | | | |
| 2333 Buchanan St. - Ambulatory Care Center (ACC)- Conversion/Renovation | | | | | | |  | | | | | | |
| Webster St./Sacramento St. Underground Parking (New) | | | | | | | |  | | | | | |
| North of Clay Parking Garage (New) | | | | | | | | | |  | | | |
| ACC Addition (New) | | | | | | | | | |  | | | |
| California Campus | | | | | | | | | | | | | |
| No New construction or demolition. Campus to be sold with some space leased back by CPMC to 2020 | | | | | | | | | | | | | |
| Davies Campus (Project/Program-Level) | | | | | | | | | | | | | |
| Neuroscience Institute (New)(Project-Level) | |  | | | | | | | | | | | |
| Castro St./14th St. Medical Office Building (New) (Program- Level) | | | | | | | | | |  | | | |
| St. Luke's Campus (All Project-Level) | | | | | | | | | | | | | |
| Hospital (New 120 bed) | | |  | | | | | | | | | | |
| 1957 Building Renovation | | | | | | | |  | | | | | |
| 1970 Tower Demolition | | | | | | | |  | | | | | |
| Medical Office Building (New) | | | | | | | | |  | | | | |
|  New Construction | | | | | | | | | | | | | |
|  Renovation | | | | | | | | | | | | | |
|  Demolition | | | | | | | | | | | | | |

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3.0 ENVIRONMENTAL ANALYSIS

3.1 INTRODUCTION

For each environmental topic, this environmental analysis section provides a summary of impacts from the Previous Project as discussed in the Final EIR. This section also provides a discussion of the impacts under the Revised Project and identifies the mitigation measures that would apply to the Revised Project, and would include all mitigation measures previously identified in the Final EIR as applicable to the Previous Project.

3.1.1 SUMMARY OF ENVIRONMENTAL ANALYSIS

Table I in Appendix A attached to this Addendum, "Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project," summarizes all of the conclusions of each environmental topic for the Previous Project and provides a comparison of the Revised Project's impacts to the Previous Project's impacts. As indicated in the Table I, the Revised Project would have similar impacts to the Previous Project. Previously identified significant and unavoidable impacts identified for the Previous Project would continue to be significant and unavoidable impacts under the Revised Project. All other Mitigation Measures under the Previous Project would remain the same and would be applicable under the Revised Project. In addition, Mitigation Measure M-NO-N4, which was applied to the Cathedral Hill Campus under the Previous Project, would also apply to the St. Luke's Campus under the Revised Project (similar to under Alternative 3A). Section 3.2 to Section 3.18 includes a summary discussion of each environmental topic. In addition to the mitigation measures presented in Table I, Appendix A also includes improvement measures in Table II, "Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project," which are applicable under both the Previous Project and Revised Project. Impacts, mitigation measures and improvement measures from the Previous Project, as outlined in the Final EIR, are identified and included here as they are applicable in the Revised Project.

The Revised Project at both the proposed Cathedral Hill Campus and St. Luke's Campus falls within the range of impacts analyzed in the Final EIR for the Previous Project and Alternative 3A. No new impacts or substantially more severe impacts have been identified for the Revised Project.

3.2 LAND USE AND PLANNING

3.2.1 CATHEDRAL HILL CAMPUS

Although the Revised Project would entail less construction of new medical space than the Previous Project, the proposed Cathedral Hill Campus would occupy the same footprint. CPMC would undertake the same demolition as under the Previous Project, creating a new campus composed of three buildings along both sides of Van Ness Avenue (including the 1375 Sutter Street site) and constructing the Van Ness Avenue pedestrian tunnel. Land use impacts related to the proposed Cathedral Hill Campus MOB would be identical to those under the Previous Project (see Draft EIR Section 4.1.5, "Impact Evaluations," beginning on page 4.1-37 in Section 4.1, "Land Use and Planning"), and therefore, are not discussed further.

The primary difference between the Revised Project and the Previous Project is that the proposed Cathedral Hill Campus Hospital would be smaller (by approximately 175,000 gsf) and shorter (by 39

feet). The proposed Cathedral Hill Campus Hospital under the Revised Project, however, would be 46 feet taller than the existing, on-site 180-foot-tall (including mechanical penthouse) 1255 Post Street Office Building and 106 feet taller than the existing 120-foot-tall (including mechanical penthouse) Cathedral Hill Hotel that occupies the site.

The Revised Project at the Cathedral Hill Campus would not physically divide an established community (Less than Significant)

The Draft EIR determined that development at the Cathedral Hill Campus under the Previous Project would not physically divide or disrupt an established community. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. For the same reasons as under the Previous Project, and because the proposed Cathedral Hill Campus development would be smaller under the Revised Project than under the Previous Project, the Revised Project at the Cathedral Hill Campus would not physically divide an established community, and this impact would be less than significant.

The Revised Project at the Cathedral Hill Campus would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (Less than Significant)

The Draft EIR development at the Cathedral Hill Campus under the Previous Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. The height of the proposed Cathedral Hill Campus Hospital would be reduced to 226 feet under the Revised Project, compared to 265 feet under the Previous Project. The smaller hospital would, like the Previous Project, not meet current 130-V Height and Bulk District height and bulk requirements. Therefore, as under the Previous Project, the Cathedral Hill Campus Hospital proposed under the Revised Project would require Planning Code text and map amendments and CU authorization. Similar to the Previous Project, a height amendment under the *Van Ness Avenue Area Plan* (VNAP) would be required, although the height increase required for the Revised Project would be less than the height increase required for the Previous Project. However, unlike under the Previous Project, the Revised Project would not exceed 240 feet in height; therefore, no changes to General Plan Urban Design Element Map 4 to increase the existing 240-foot height limit would be required. In addition, unlike under the Previous Project, the amendment to Map 1 of the VNAP required for the Revised Project would not include a floor area ratio (FAR) increase for the Cathedral Hill Campus Hospital site, because the hospital site's FAR would comply with the Map 1 FAR maximum of 7.1:1. (The hospital under the Previous Project would have resulted in a FAR of 9:1.) However, as under the Previous Project, the amendment to Map 1 of the VNAP for the Revised Project would increase the maximum FAR for the proposed Cathedral Hill Campus MOB site from 7.1:1 to 7.5:1.

With the exception of the General Plan Urban Design Element Map 4 amendment, which is no longer needed, all other approvals associated with the Previous Project (discussed on Draft EIR page 4.1-47 in Section 4.1, "Land Use and Planning") would still be required under the Revised Project. These project approvals would also be included in the Revised Project, although with some modifications. Therefore, if the requested project approvals for Cathedral Hill Campus development under the Revised Project are granted by decision-makers, the Revised Project at the Cathedral Hill Campus would not conflict with any applicable land use plan, policy, or regulation. This impact would be less than significant and less than under the Previous Project because of the proposed Cathedral Hill Campus Hospital's height and FAR reduction (compared to under the Previous Project).

*The Revised Project at the Cathedral Hill Campus would not have a substantial impact on the existing character of the vicinity (**Less than Significant**)*

The Draft EIR development at the Cathedral Hill Campus under the Previous Project would not have a substantial impact on the existing character of the vicinity. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. Under the Revised Project, CPMC would construct less floor area for medical uses at the Cathedral Hill Campus than under the Previous Project, although on-site medical uses would still be greater than under existing conditions. Constructing the proposed Cathedral Hill Campus Hospital would still introduce a new medical use to the former hotel/office site; however, as under the Previous Project, demolishing a vacant hotel and one vacant office building would not likely have a substantial effect on the existing character of the vicinity. As under the Previous Project, streetscape improvements would be added around the proposed Cathedral Hill Campus to activate the street level and for pedestrian interest, as well as provide a buffer between pedestrians and traffic lanes.

As discussed on Draft EIR page 4.1-57 in Section 4.1, "Land Use and Planning," large-scale, high-rise buildings of up to 25 floors exist in the area surrounding the proposed campus, and the existing General Plan designation would allow a development of up to 240 feet at the hospital site. The Final EIR concluded that the proposed development at the Cathedral Hill Campus under the Previous Project would have a less-than-significant impact on the existing character of the vicinity because it is already a bustling, densely developed, active area. The proposed Cathedral Hill Campus Hospital under the Revised Project would be 39 feet shorter than under the Previous Project. Although building heights on the proposed Cathedral Hill Campus would increase under the Revised Project, relative to existing conditions, the reduced-height hospital building would have a less-than-significant impact on the character of the vicinity, and the impact would be less than under the Previous Project.

3.2.1.1 SUMMARY OF LAND USE AND PLANNING IMPACTS AT THE CATHEDRAL HILL CAMPUS

The Final EIR concluded that the proposed development at the Cathedral Hill Campus under the Previous Project would result in less-than-significant project-level and cumulative impacts related to the topics of land use and planning. Project-level and cumulative impacts of the proposed development at the Cathedral Hill Campus under the Revised Project related to the topics of land use; land use plans, policies, or regulations; and the existing character of the vicinity would be similarly less than significant, and less than under the Previous Project. As under the Previous Project, no mitigation measures are required for the proposed development at the proposed Cathedral Hill Campus under the Revised Project for land use and planning impacts.

3.2.2 ST. LUKE'S CAMPUS

The Revised Project would add 40 more acute care beds and two additional floors totaling about 75,841 more gsf to the St. Luke's Campus Hospital, compared to the Previous Project. No new buildings and no additional demolition of existing buildings are proposed under the Revised Project than would have occurred under the Previous Project.

The Revised Project at the St. Luke's Campus would not physically divide an established community (Less than Significant)

The Final EIR development at the St. Luke's Campus under the Previous Project would not physically divide or disrupt an established community. Therefore, the Final EIR concluded that this impact would be less than significant under both the Previous Project and Alternative 3A. The Revised Project would involve more development at the St. Luke's Campus than under the Previous Project, but less than under Alternative 3A. Impacts of the Revised Project, as with the Previous Project and Alternative 3A, would be less than significant for the same reasons.

The Revised Project at the St. Luke's Campus would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (Less than Significant)

The Final EIR development at the St. Luke's Campus under the Previous Project and Alternative 3A would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project and Alternative 3A. The St. Luke's Campus Hospital and St. Luke's Campus MOB would be at the same sites on campus as under the Previous Project. The increase in height of the St. Luke's Campus Hospital under the Revised Project would require the same approvals as the Previous Project, although slightly modified. The required approvals for St. Luke's Campus under the Revised Project would include, among other things, General Plan Amendments; Planning Code text and map amendments, including the creation of a new Special Use District to increase the existing maximum FAR; a CU authorization to modify the existing PUD for the St. Luke's Campus in order to allow exceptions to the rear-yard requirements, restriction on projections extending over a street or alley, and height and bulk limits for buildings taller than 40 feet in the RH-2 district; and an Office Allocation. See Section 2.6.4, "Required Project Approvals," for the St. Luke's Campus beginning on page 2-191 of the Draft EIR, as modified by staff-initiated text changes on page C&R 4-58 of the C&R document, and Section 2, above, of this Addendum. Therefore, if the requested project approvals for St. Luke's Campus development under the Revised Project are granted by decision-makers, the Revised Project would not conflict with any applicable land use plan, policy or regulation. Impacts of the Revised Project, as with the Previous Project and Alternative 3A, would continue to be less than significant for the same reasons.

The Revised Project at the St. Luke's Campus would not have a substantial impact on the existing character of the vicinity (Less than Significant)

The Final EIR development at the St. Luke's Campus under the Previous Project and Alternative 3A would not have a substantial impact on the existing character of the vicinity. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project and Alternative 3A. Implementing the Revised Project would somewhat intensify medical use at the St. Luke's Campus, relative to existing conditions and the Previous Project, because of the 40 additional licensed acute-care beds over the 80 beds proposed with the Previous Project.

Under the Revised Project, as with the Previous Project and Alternative 3A, Cesar Chavez Street would buffer surrounding uses from the Campus and minimize any incremental changes to the intensity of use on the Campus, compared to existing conditions. As with the Previous Project, the Revised Project would include landscape and streetscape improvements for St. Luke's Campus, compatible with the City's proposed improvements along Cesar Chavez Street. Further, the tallest building height (142 feet) on the St. Luke's Campus under the Revised Project would be less than under existing conditions, because the existing, on-campus 158-foot-tall (plus 11-foot mechanical penthouse) St. Luke's Hospital tower would be demolished (as under the Previous Project) and replaced by a hospital with a height of 142 feet. Although 75,841 gsf of additional construction would provide space for 40 more licensed beds, and

associated support facilities, the St. Luke's Campus would not otherwise change compared to the Previous Project, and the Revised Project would not introduce new types of uses on campus. Medical uses would continue to be provided as they are at the existing St. Luke's Campus, and the Revised Project, like the Previous Project, would not alter surrounding uses. Therefore, the impact of the Revised Project on the existing character of the vicinity, as with the Previous Project and Alternative 3A, would continue to be less than significant for the same reasons.

3.2.2.1 SUMMARY OF LAND USE AND PLANNING IMPACTS AT THE ST. LUKE'S CAMPUS

The Final EIR concluded that the proposed development at the St. Luke's Campus under the Previous Project would result in less-than-significant project-level and cumulative impacts related to the topics of land use and planning. Project-level and cumulative impacts of the proposed development at the St. Luke's Campus under the Revised Project related to the topics of on land use; land use plans, policies or regulations; and the existing character of the vicinity would be similarly less than significant. As under the Previous Project (and Alternative 3A), no mitigation measures are required for the proposed development at the proposed St. Luke's Campus under the Revised Project for land use and planning impacts.

3.3 AESTHETICS

3.3.1 CATHEDRAL HILL CAMPUS

Under the Revised Project, the proposed Cathedral Hill Campus Hospital would be 12 floors and 226 feet tall⁵, or approximately 39 feet and three floors shorter than the 15-floor, 265-foot-tall Cathedral Hill Campus Hospital proposed under the Previous Project. The proposed Cathedral Hill Campus MOB (nine floors and 130 feet tall) would remain unchanged under the Revised Project, compared to the Previous Project. Aesthetic impacts of the proposed Cathedral Hill Campus MOB under the Revised Project would be identical to the less-than-significant impacts under the Previous Project and therefore are not discussed further.

*The Revised Project at the Cathedral Hill Campus would not have a substantial effect on a scenic highway or scenic vista (**Less than significant**)*

The proposed Cathedral Hill Campus Hospital under the Revised Project would be 226 feet tall, or approximately 106 feet taller than the existing, on-site 120-foot-tall Cathedral Hill Hotel and 46 feet taller than the existing, on-site 180-foot-tall 1255 Post Street Office Building, respectively. However under the Revised Project, the proposed Cathedral Hill Campus Hospital would not be substantially taller than existing buildings in the immediate vicinity. The Final EIR concluded that the proposed development at the Cathedral Hill Campus under the Previous Project would have a less-than-significant impact on a scenic highway or scenic vista, because the Previous Project would not result in a substantial adverse visual change. The proposed development (including new hospital) at the Cathedral Hill Campus under the Revised Project is similarly not anticipated to alter scenic views. The proposed Cathedral Hill Campus Hospital under the Revised Project would be about 39 feet shorter than under the Previous Project and is similarly not anticipated to result in any blockage of important visual landscape elements that are currently seen in long-range vistas of the Cathedral Hill area. Therefore, the proposed development at the Cathedral Hill Campus under the Revised Project would have a less-than-significant impact on scenic

⁵ All stated building heights include any mechanical penthouses, unless explicitly stated otherwise.

vistas. This impact would be less than under the Previous Project, because of the proposed Cathedral Hill Campus Hospital's height reduction (compared to under the Previous Project).

The Revised Project at the Cathedral Hill Campus would not substantially damage scenic resources (Less than significant)

Existing trees and landscaping located on campus would be removed for construction of the proposed Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB, and Van Ness Avenue pedestrian tunnel under the Revised Project, as would occur under the Previous Project. However, as under the Previous Project, a landscaping plan would be prepared to provide for the preservation, removal, and/or replacement of trees throughout the proposed Cathedral Hill Campus. Please refer to the "Biological Resources" Section of the Draft EIR (beginning on Draft EIR page 4.13-1) for the impact analysis related to trees. The Final EIR concluded that the proposed development at the Cathedral Hill Campus under the Previous Project would have a less-than-significant impact on scenic highway or scenic vista because it would not substantially alter distant or close views. The proposed development at the Cathedral Hill Campus under the Revised Project would similarly not substantially damage scenic resources and would have a less-than-significant impact on scenic resources. This impact would be similar to the impact under the Previous Project, because development would occur within the same footprint at the proposed Cathedral Hill Campus under the Revised Project as it would under the Previous Project.

The Revised Project at the Cathedral Hill Campus would not substantially degrade the existing visual character or quality of the site and surroundings (Less than significant)

The proposed Cathedral Hill Campus Hospital would be 12 floors and 226 feet tall under the Revised Project, and would be taller but comparable in scale to the existing surrounding buildings, which are nine to 11 floors tall (up to about 130 feet tall). In contrast, under the Previous Project, the proposed Cathedral Hill Campus Hospital would be 15 floors tall or approximately 265 feet tall. As under the Previous Project, the hospital's height and massing under the Revised Project would be within a similar range of the height and massing of existing surrounding development, would be visually consistent with existing surrounding buildings, and therefore, would not degrade the existing visual character or quality of the area. The Final EIR concluded that this impact would be less than significant for the proposed development at the Cathedral Hill Campus under the Previous Project because no scenic natural resources currently exist on or near the Cathedral Hill Campus. The proposed Cathedral Hill Campus Hospital under the Revised Project would have a similarly less-than-significant impact on the visual character of the area, and this impact would be less than under the Previous Project.

The Revised Project at the Cathedral Hill Campus would not create a new source of light or glare that would adversely affect day or nighttime views in the area or that would substantially affect other people or properties (Less than significant)

The existing buildings (i.e., the Cathedral Hill Hotel and 1255 Post Street Building) at the Cathedral Hill Campus Hospital site generate a high level of light. New security and building-entrance lighting would be required for the proposed Cathedral Hill Campus under the Revised Project, as under the Previous Project. Therefore, the lighting for the new facilities associated with the Revised Project, similar to the lighting required under the Previous Project, would not result in a substantial increase in the ambient lighting of the campus area. Spillover light is common and expected in dense urban environments such as the Cathedral Hill area. The lighting for the new facilities would be installed and operated in compliance with the City's Lighting Guidelines and the California Building Standards Code (Title 24). The Final EIR concluded that this impact would be less than significant for the proposed development at the Cathedral Hill Campus under the Previous Project because of the reasons discussed above. This impact would be similarly less than significant for the proposed development at Cathedral Hill Campus under the Revised

Project, and less than under the Previous Project due to the proposed Cathedral Hill Campus Hospital's size reduction (compared to under the Previous Project).

3.3.1.1 SUMMARY OF AESTHETIC IMPACTS AT THE CATHEDRAL HILL CAMPUS.

The Final EIR concluded that the proposed development at Cathedral Hill Campus under the Previous Project would result in less-than-significant project-level and cumulative impacts related to the topic of aesthetics. Project-level and cumulative impacts of the proposed development at the Cathedral Hill Campus under the Revised Project related to the topics of on scenic resources, visual character or quality, and light and glare would be similarly less than significant. As under the Previous Project, no mitigation measures would be required for the proposed development at Cathedral Hill Campus under the Revised Project for aesthetic impacts, and, overall, this proposed development under the Revised Project would not result in substantial degradation of the visual character or quality of the project area.

3.3.2 ST. LUKE'S CAMPUS

The Revised Project includes development of a 120-bed, seven-floor, and 142-foot-tall St. Luke's Campus Hospital, instead of the 80-bed, five-floor, and 99-foot-tall hospital on this campus under the Previous Project. The St. Luke's Campus Hospital under the Revised Project would be two floors and 43 feet taller than under the Previous Project, but would be constructed within the same building footprint on campus as under the Previous Project. Under Alternative 3A in the Final EIR, two hospital buildings would be constructed in two phases at the St. Luke's Campus. The first-phase hospital building would include 80 beds on six floors with a height of 115 feet. The second-phase Women's and Children's hospital building would include another 160 beds also on six floors with a height of 116 feet. The St. Luke's Campus Hospital under the Revised Project would be in one building and one floor, and 26–27 feet taller than the hospital buildings under Alternative 3A. As under the Previous Project, after construction of the proposed St. Luke's Campus Hospital, the existing, on-campus 12-floor, 158-foot-tall St. Luke's Hospital tower would be demolished, and a five-floor, 100-foot-tall St. Luke's Campus MOB would be constructed at the site of the demolished St. Luke's Hospital tower under the Revised Project. No changes from what was analyzed in the Previous Project are proposed for the new St. Luke's Campus MOB or the existing 1912 Building, Monteagle Medical Center, Duncan Street Parking Garage, or Hartzell Building. Overall, development at the St. Luke's Campus under Alternative 3A would be larger than under the Revised Project.

The overall development after full buildout of the St. Luke's Campus (approximately 681,576 sq. ft.) under the Revised Project would be about 75,841 sq. ft. greater than full buildout at this campus under the Previous Project (605,735 sq. ft.). Therefore, as with Alternative 3A, the overall development at the St. Luke's Campus under the Revised Project would be larger than under existing conditions and under the Previous Project. The overall development after buildout of the St. Luke's Campus (approximately 681,576 sq. ft.) under the Revised Project would be about 212,110 sq. ft. smaller than full buildout at this campus under Alternative 3A. Therefore, the overall development at the St. Luke's Campus under the Revised Project would be smaller than under Alternative 3A. The St. Luke's Campus Hospital under the Revised Project would be taller than under the Previous Project, as well as under Alternative 3A. The overall development proposed at the St. Luke's Campus under the Revised Project would be denser and bulkier than under the Previous Project, but not denser or bulkier than under Alternative 3A, which was previously analyzed in the EIR.

The Revised Project at the St. Luke's Campus would not have a substantial effect on a scenic highway or scenic vista (Less than significant)

The 142-foot-tall proposed St. Luke's Campus Hospital under the Revised Project would be 43 feet taller than the 99-foot-tall St. Luke's Campus Hospital proposed under the Previous Project, but would be constructed on the same site on campus and with the same general layout. The 142-foot-tall St. Luke's Campus Hospital under the Revised Project, however, would be 15 feet shorter than the existing hospital tower currently at St. Luke's Campus, which is 158-foot-tall (not including 11-foot-tall mechanical penthouse) (see Figure 4.2-28 in the EIR). The 43-foot height difference between the height of the St. Luke's Campus Hospital under the Revised Project and the Previous Project would be noticeable. However, given that the proposed hospital under the Revised Project would be 15 feet shorter than the hospital currently on campus, the additional proposed height for the St. Luke's Campus Hospital under the Revised Project would not be a substantial adverse change on the campus, compared to existing conditions. It is not anticipated to be a substantial change for the campus area and its surroundings and would result in a minimal difference in the visual effects, compared to existing conditions. Therefore, impacts of the proposed development at St. Luke's Campus under the Revised Project related to visual effects would be less than significant.

Although the 142-foot-tall St. Luke's Campus Hospital under the Revised Project would be 27 feet taller than the 115-foot-tall hospital proposed under Alternative 3A, the overall building footprint, building bulk and density of development with respect to floor area at the St. Luke's Campus under the Revised Project would be smaller than under Alternative 3A. The impact on scenic vistas/views with the development at St. Luke's Campus under Alternative 3A (similar to under the Previous Project) was determined to be less than significant in the Final EIR. As under the Previous Project and Alternative 3A, the St. Luke's Campus Hospital under the Revised Project would not block any unique views. The impact on scenic vistas/views with development at St. Luke's Campus under the Revised Project would be less than significant, but greater than under the Previous Project and similar to impacts under Alternative 3A (under which more development at St. Luke's Campus would occur at full buildout than under the Revised Project).

The Revised Project at the St. Luke's Campus would not substantially damage scenic resources (Less than significant)

The Final EIR concluded that this impact would be less than significant with the proposed development at the St. Luke's Campus under the Previous Project. The development would result in a tree-lined urban streetscape, which would be fully visible in close-up views to drivers, and therefore the impact on the 49-Mile Scenic Drive's resources would be less than significant. The impact also would be less than significant because no visible topographic impact or impacts on unique natural scenic resources would occur at the St. Luke's Campus. Because the amount of demolition and site work under the Revised Project would be identical to the Previous Project, the significance of this impact would be the same as under the Previous Project. The proposed development at the St. Luke's Campus under the Revised Project would therefore not substantially damage scenic resources and would have a less-than-significant impact on scenic resources. As under the Previous Project, implementation of Improvement Measure I-BI-N2 (see Draft EIR page 4.13-27) related to protection of the landmark fig tree located near the 1957 Building would be required for the proposed development at the St. Luke's Campus under the Revised Project.

The Revised Project at the St. Luke's Campus would not substantially degrade the existing visual character or quality of the site and surroundings (Less than significant)

The Final EIR concluded that the proposed development at the St. Luke's Campus under the Previous Project would result in a less-than-significant impact related to substantial degradation of the existing visual character or quality of the site and surroundings. The visual contrast resulting from the St. Luke's Campus Hospital would not be substantial or adverse compared to existing conditions, for several reasons:

- (1) the site is currently developed with a large hospital tower, and the new structure had been designed to be more visually integrated into the surrounding development;
- (2) the visual contrast that currently exists between the existing 12-floor hospital tower and surrounding buildings would be similar or reduced with the construction of the proposed five-floor St. Luke's Campus MOB;
- (3) the two proposed buildings would have a compatible architectural composition for the portion of the St. Luke's Campus fronting on Cesar Chavez Street; and
- (4) the landscape design would present a more unified integrated design composition than exists at present.

The 142-foot-tall St. Luke's Campus Hospital under the Revised Project would be 43 feet taller than the 99-foot-tall St. Luke's Campus Hospital proposed under the Previous Project, but would be constructed on the same site on campus with the same general layout. In addition, there would be a 27-foot height difference between the height of the St. Luke's Campus Hospital under the Revised Project (142 feet) and under Alternative 3A (115 feet). The 142-foot-tall St. Luke's Campus Hospital under the Revised Project, however, would be 15 feet shorter than the existing hospital tower currently at St. Luke's Campus, which is 158 feet tall (not including 11-foot-tall mechanical penthouse) (see Figure 4.2-28 in the Draft EIR). The 43-foot height difference between the height of the St. Luke's Campus Hospital under the Revised Project and the Previous Project would be noticeable. The smaller 27-foot height difference between the height of the proposed St. Luke's Campus Hospital under the Revised Project and Alternative 3A would also be noticeable. However, given that the proposed 142-foot-tall St. Luke's Campus Hospital under the Revised Project would be 15 feet shorter than the 158-foot-tall hospital currently on campus, the additional proposed height for St. Luke's Campus Hospital under the Revised Project (compared to under the Previous Project and Alternative 3A) would not be a substantial adverse change on the campus relative to existing conditions. It is not anticipated to be a substantial change for the campus area and its surroundings or substantially noticeable from surrounding areas, and would result in a minimal difference in the visual effects, compared to existing conditions. Therefore, impacts of the proposed development at the St. Luke's Campus related to visual effects would continue to be less than significant.

Although the 142-foot-tall St. Luke's Campus Hospital under the Revised Project would be 27 feet taller than the 115-foot-tall hospital proposed under Alternative 3A, the overall building footprint, building bulk and density of development with respect to floor area at the St. Luke's Campus under the Revised Project would be smaller than under Alternative 3A. At full buildout, the development at St. Luke's Campus under Alternative 3A would be greater than under the Revised Project. As under the Previous Project and Alternative 3A, the Revised Project at the St. Luke's Campus would not substantially degrade the existing visual character or quality of the campus or the surrounding setting. The visual contrast would not be substantial or adverse when compared to the existing conditions for several reasons:

- (1) the site is currently developed with a large hospital tower, and the new structure has been designed to be more visually integrated into the surrounding development;
- (2) the two proposed buildings would have a compatible architectural composition for the portion of the St. Luke's Campus fronting on Cesar Chavez Street; and
- (3) the landscape design would present a more unified integrated design composition than exists at present.

Although this impact for the proposed development at St. Luke's Campus under the Revised Project would be greater than under the Previous Project, it would remain less than significant, and would be less than under Alternative 3A (under which more development at St. Luke's Campus would occur at full buildout than under the Revised Project).

Although this impact would be greater than under the Previous Project, it would remain less than significant, and would be less than under Alternative 3A (under which more development at St. Luke's Campus would occur at full buildout than under the Revised Project).

The Revised Project at the St. Luke's Campus would not create a new source of light or glare that would adversely affect day or nighttime views in the area or that would substantially affect other people or properties (Less than significant)

A high level of lighting is generated by the existing buildings on St. Luke's Campus. The lighting associated with proposed new facilities would be slightly greater under the Revised Project than under the Previous Project due to the two additional floors at the St. Luke's Campus Hospital, but less than under Alternative 3A, and would not result in a substantial increase in the ambient lighting of the campus area. The lighting for the new facilities associated with the Revised Project, similar to the lighting required under the Previous Project, would not result in a substantial increase in the ambient lighting of the Campus area. Spillover light is common and expected in dense urban environments such as the St. Luke's Campus area. The lighting for the new facilities would be installed and operated in compliance with the City's Lighting Guidelines and the California Building Standards Code (Title 24). The Final EIR concluded that this impact would be less than significant for the proposed development at St. Luke's Campus under the Previous Project and Alternative 3A because of the reasons discussed above. This impact would be less than significant for the proposed development at St. Luke's Campus under the Revised Project, but greater than under the Previous Project and less than under Alternative 3A (under which more development at St. Luke's Campus would occur at full buildout than under the Revised Project).

3.3.2.1 SUMMARY OF AESTHETIC IMPACTS AT THE ST. LUKE'S CAMPUS

The Final EIR concluded that the proposed development at St. Luke's Campus under the Previous Project would result in less-than-significant project-level and cumulative impacts related to the topic of aesthetics. Project-level and cumulative impacts at the St. Luke's Campus under the Revised Project related to scenic resources, visual character or quality, and light and glare would remain less than significant, although greater than under the Previous Project but less than under Alternative 3A, because of the increased size of the hospital at the campus. As under the Previous Project, no mitigation measures would be required for the proposed development at St. Luke's Campus under the Revised Project for aesthetic impacts, and, overall, this proposed development under the Revised Project would not result in substantial degradation of the visual character or quality of the project area.

3.4 POPULATION, EMPLOYMENT, AND HOUSING

The Revised Project would not induce substantial population growth in an area, either directly or indirectly. (Less than significant)

The Final EIR concluded that the impact of proposed development at the Cathedral Hill Campus, the St. Luke's Campus, and full buildout of CPMC campuses in the aggregate related to population growth under the Previous Project, and under Alternative 3A, would be less than significant because the proposed Cathedral Hill and St. Luke's Campuses would not induce substantial population growth in the area, either directly or indirectly. Under the Revised Project, there would be an overall decrease of approximately 99,160 gsf of total building area at the CPMC campuses as compared to the Previous Project. Similarly, there would be an overall decrease under the Revised Project of approximately 45,673 gsf of total building area in comparison to Alternative 3A. This would result in a corresponding decrease in population and housing needs. Therefore, there would be a less-than-significant impact related to population growth under the Revised Project, and this impact would be less than under both the Previous Project and Alternative 3A, due to the addition of fewer new residents and housing units under the Revised Project.

The Revised Project would not displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing. (Less than significant)

The Final EIR concluded that the impact of proposed development at the Cathedral Hill Campus, the St. Luke's Campus, and full buildout of CPMC campuses in the aggregate related to displacement of substantial numbers of existing housing units under the Previous Project, and under Alternative 3A, would be less than significant. The tenants displaced from the five dwelling units and 20 residential hotel units that would be demolished at the Cathedral Hill Campus would be compensated, residents would be offered relocation assistance, and no housing units would be displaced by development under the Previous Project at any other CPMC campus. Under the Revised Project, the development footprint at all campuses would be the same, and the same buildings would be demolished, as under the Previous Project. Therefore, impacts of the Revised Project related to the displacement of existing housing units would be the same as under the Previous Project, and would be less than significant.

The Final EIR concluded that the impact of proposed development at the Cathedral Hill Campus, the St. Luke's Campus, and full buildout of CPMC campuses in the aggregate related to the creation of demand for additional housing under the Previous Project, and under Alternative 3A, would be less than significant. With the availability of vacant housing and additional inventory of sites for residential development that could accommodate future estimated housing demand, the effect of the projected increase in housing demand related to development under the Previous Project on San Francisco's population and housing would not be substantial. As explained above, under the Revised Project, there would be an overall decrease of total building area at the CPMC campuses as compared to both the Previous Project and Alternative 3A, which would result in a corresponding decrease in population and housing needs. Therefore, there would be a less-than-significant impact related to the creation of housing demand under the Revised Project, and this impact would be less than under both the Previous Project and Alternative 3A, due to the addition of fewer new residents and housing units under the Revised Project.

The Revised Project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. (Less than significant)

The Final EIR concluded that the impact of development at the proposed Cathedral Hill Campus, the St. Luke's Campus, and full buildout of CPMC campuses in the aggregate related to population growth under

the Previous Project, and under Alternative 3A, would be less than significant. CPMC would provide for the relocation of tenants needing assistance and provide compensation to former tenants at the Cathedral Hill Campus, and would not displace any units as part of development at the other CPMC campuses. Under the Revised Project, the development footprint at all campuses would be the same, and the same buildings would be demolished, as under the Previous Project. Therefore, impacts of the Revised Project related to the displacement of existing housing units would be the same as under the Previous Project, and would be less than significant.

3.4.1.1 SUMMARY OF POPULATION, EMPLOYMENT, AND HOUSING IMPACTS

The Final EIR concluded that the proposed development under the Previous Project would result in less-than-significant project-level and cumulative impacts related to the topic of population, employment, and housing. The CPMC campuses are located in various locations within San Francisco, and employment-generating uses create impacts on a much larger area, citywide and potentially regionwide. The overall impacts on population and housing would be regional/citywide, not localized impacts on campus neighborhoods. As a result, implementing the Revised Project in combination with the cumulative projects would not cause cumulatively considerable impacts on population and employment at the CPMC campuses, in the surrounding neighborhoods, or citywide. The cumulative population, employment, and housing impact would be less than significant. Construction of the proposed Cathedral Hill Campus MOB at the Cathedral Hill Campus would result in the loss of five residential dwelling units and 20 residential hotel units. CPMC would provide for the relocation of tenants needing assistance, in excess of that required by law. Near-term and long-term projects at the California, Davies, and St. Luke's Campuses would not displace housing units or people. The cumulative housing displacement impact of the Revised Project would be less than significant.

3.5 CULTURAL RESOURCES

3.5.1 CATHEDRAL HILL CAMPUS

As under the Previous Project, the existing Cathedral Hill Hotel and 1255 Post Street Building at the site of the proposed Cathedral Hill Campus Hospital and the existing buildings at the site of the proposed Cathedral Hill Campus MOB would be demolished, and a pedestrian tunnel would be constructed beneath Van Ness Avenue under the Revised Project. Demolition and construction of the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB would occur within the same footprint on this campus as the Previous Project.

Construction of the Revised Project at the Cathedral Hill Campus would not result in the removal of existing structures that are eligible for listing in the California Register of Historical Resources, and thus, would not cause a substantial adverse change in the significance of a historical resource. (No impact)

The Final EIR concluded that the proposed development at Cathedral Hill Campus under the Previous Project would have no impact related to historic resources because none of the existing structures that would be removed are eligible for listing in the California Register of Historical Resources (CRHR).

The proposed development at Cathedral Hill Campus under the Revised Project would not cause a substantial adverse change in the significance of a historical resource, as defined in Section 15064.5 of the

State CEQA Guidelines, because none of the buildings or structures located within the project site are considered historical resources.^{6, 7} As under the Previous Project, there would be no impact.

Construction of the Revised Project at the Cathedral Hill Campus could potentially adversely affect the significance of subsurface archaeological resources. (Less than significant with mitigation)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project related to subsurface archaeological resources would be less than significant with implementation of Mitigation Measure M-CP-N2 at the proposed Cathedral Hill Campus. Implementation of this measure would ensure that any potentially affected archaeological deposit would be identified, evaluated, and as appropriate, subject to data recovery by a qualified archaeologist under the oversight of the Environmental Review Officer (ERO). As under the Previous Project, archaeological resources potentially could be affected by construction activities for the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB under the Revised Project, and this impact would be potentially significant. Like the Previous Project, the Revised Project would require excavation during construction of the belowground parking levels at the proposed Cathedral Hill Campus, and the amount of excavation would be the same as under the Previous Project. Features of prehistoric resources may be located during this excavation. In addition, the soils under the sites of the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB have the possibility to contain archaeological materials. Mitigation Measure M-CP-N2 (see Draft EIR page 4.4-38 in Section 4.4, “Cultural and Paleontological Resources”) would require preconstruction archaeological testing in accordance with an architectural testing program and, if warranted, implementation of an archeological monitoring program during soil-disturbing activities and an archaeological data recovery program if archaeological resources are discovered. As under the Previous Project (and similar to Alternative 3A), implementation of Mitigation Measure M-CP-N2 for the proposed development at Cathedral Hill Campus under the Revised Project would reduce impacts to undiscovered archaeological resources to less-than-significant levels. Mitigation Measure M-CP-N2 would be implemented for the Revised Project.

Earth-moving activities related to construction of the Revised Project at the Cathedral Hill Campus could damage or destroy previously unknown, unique paleontological resources. (Less than significant with mitigation)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project related to paleontological resources would be less than significant with implementation of Mitigation Measure M-CP-N3 at the proposed Cathedral Hill Campus. Construction workers would be alerted to the possibility of encountering paleontological resources, and in the event that resources were encountered, fossil specimens would be recovered and recorded and would undergo appropriate curation.

The Colma Formation, which underlies all CPMC campus sites, is considered a paleontologically sensitive rock formation because of its potential to contain unique paleontological resources. As under the Previous Project, earthmoving activities occurring with the proposed development at Cathedral Hill Campus under the Revised Project could damage unique paleontological resources, resulting in a potentially significant impact. Mitigation Measure M-CP-N3 (see Draft EIR page 4.4-47) would require

⁶ California Pacific Medical Center. 2008 (September). *Historic Evaluation Report for Cathedral Hill Campus: California Pacific Medical Center*. San Francisco, CA. Prepared by Knapp Architects, San Francisco, CA. Page 2.

⁷ San Francisco Planning Department. 2010 (March 18). *Historic Resource Evaluation Response: Cathedral Hill Campus, California Pacific Medical Center*. Case 2005.0555E. Major Environmental Analysis Division. San Francisco, CA. Pages 2–3.

CPMC to retain a qualified paleontologist or archaeologist to train construction workers in the requisite procedures, in the event paleontological resources are discovered during earthmoving activities. If such resources are discovered, Mitigation Measure M-CP-N3 would require cessation of work near the find until recommendations in a resource recovery plan have been implemented. As under the Previous Project (and similar to Alternative 3A), implementing this mitigation measure for the proposed development at Cathedral Hill Campus under the Revised Project would reduce impacts on paleontological resources to less-than-significant levels.

Construction activities at the Cathedral Hill Campus under the Revised Project could disturb as-yet-discovered human remains. (Less than significant with mitigation)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project related to discovery of human remains would be less than significant with implementation of Mitigation Measure M-CP-N4 at the proposed Cathedral Hill Campus. Implementation of this measure would ensure that any potentially affected archaeological deposit would be identified, evaluated, and as appropriate, subject to data recovery by a qualified archaeologist under the oversight of the ERO.

No human remains have been listed or recorded at any of the CPMC sites; however, excavation at the sites of the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB could disturb as-yet-undiscovered human remains. Mitigation Measure M-CP-N4 (see Draft EIR page 4.4-49) would require that work be suspended within 50 feet of the remains, that the San Francisco Planning Department and the county coroner be notified of the find, and that all such human remains and funerary objects discovered shall be treated in compliance with state and federal laws. As under the Previous Project, this impact for the proposed development at Cathedral Hill Campus under the Revised Project would be less than significant with mitigation.

3.5.1.1 SUMMARY OF CULTURAL RESOURCES IMPACTS AT THE CATHEDRAL HILL CAMPUS

The Final EIR concluded that the proposed development at Cathedral Hill Campus under the Previous Project would result in less-than-significant project-level and cumulative impacts related to cultural resources with the implementation of Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4. In accordance with CEQA and pursuant to Planning Department Preservation Bulletin 16, cumulative future development in the project area would be subject to review on a case-by-case basis. This process would reduce the cultural impacts of cumulative projects to less-than-significant levels. Therefore, the Final EIR concluded that the Previous Project would have a less-than-significant cumulative impact related to cultural resources. Project-level and cumulative impacts of the proposed development at Cathedral Hill Campus under the Revised Project related to cultural resources would be similarly less than significant with mitigation. As under the Previous Project, implementation of Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4 would be required for the proposed development at the Cathedral Hill Campus under the Revised Project. The Revised Project would require the same amount of ground disturbance as under the Previous Project. Therefore, the Revised Project would result in less-than-significant project-level and cumulative impacts on historic, archaeological, and paleontological resources, similar to the Previous Project.

3.5.2 ST. LUKE'S CAMPUS

The proposed development at St. Luke's Campus under the Revised Project would require an additional 9,000 cubic yards of excavation and two additional floors of construction (approximately 75,841 gsf) for

the St. Luke's Campus Hospital, as compared to the Previous Project. No additional new buildings and no additional demolition of existing, on-campus buildings are proposed than would have occurred under the Previous Project, and the St. Luke's Campus site plan under the Revised Project would not be changed from what was proposed under the Previous Project.

Construction of the Revised Project at the St. Luke's Campus would not result in the removal of existing structures that are eligible for listing in the California Register of Historical Resources, and thus would not cause a substantial adverse change in the significance of a historical resource. (Less than significant)

The Final EIR concluded that the impact of the proposed development at St. Luke's Campus under the Previous Project related to historical resources would be less than significant for several reasons:

- (1) the buildings proposed for demolition did not meet criteria for historical significance;
- (2) the 1912 Building, which appears eligible for listing, would be rehabilitated and restored in keeping with the Secretary of the Interior's Standards; and
- (3) the setting of the 1912 Building has previously been altered by the addition of new buildings and the demolition of the existing hospital tower, and construction of the St. Luke's Campus MOB would not further degrade the historic setting of this historic resource.

As under the Previous Project, the proposed development at St. Luke's Campus under the Revised Project would not result in the removal of existing structures that are eligible for listing in the CRHR, and thus would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines. This impact for the proposed development at St. Luke's Campus under the Revised Project would be less than significant and identical to the impact under the Previous Project (and similar to the impact under Alternative 3A), because no changes to historical structures at the St. Luke's Campus would occur under the Revised Project that would not also occur under the Previous Project.

Construction of the Revised Project at the St. Luke's Campus could potentially adversely affect the significance of subsurface archaeological resources. (Less than significant with mitigation)

The Final EIR concluded that the impact of the proposed development at St. Luke's Campus under the Previous Project related to subsurface archaeological resources would be less than significant with implementation of Mitigation Measure M-CP-N2 at the proposed St. Luke's Campus. Implementation of this measure would ensure that any potentially affected archaeological deposit would be identified, evaluated, and as appropriate, subject to data recovery by a qualified archaeologist under the oversight of the ERO.

Archaeological resources potentially could be affected by construction activities associated with either the proposed development at St. Luke's Campus under the Previous Project, Alternative 3A or the Revised Project, which would result in a potentially significant impact. The proposed development at St. Luke's Campus under the Revised Project would require more excavation (about 9,000 additional cubic yards) and construction than under the Previous Project. Alternative 3A would require a greater amount of excavation than either the Previous Project or the Revised Project due to the construction of an additional second-phase hospital building and larger MOB under Alternative 3A. Below-grade levels for the proposed development at St. Luke's Campus under the Revised Project would require excavation in locations where prehistoric archaeological resources may be located. In addition, the soils under the site

have the possibility to contain archaeological materials. However, as under the Previous Project, Mitigation Measure M-CP- N2 (see Draft EIR page 4.4-38 in Section 4.4, “Cultural and Paleontological Resources”) would require preconstruction archaeological testing for the proposed development at St. Luke’s Campus under the Revised Project in accordance with an architectural testing program and, if warranted, implementation of an archeological monitoring program during soil-disturbing activities and an archaeological data recovery program if archaeological resources are discovered. Implementing this mitigation measure at St. Luke’s Campus under the Revised Project would reduce this impact to a less-than-significant level; however, impacts would be slightly greater than under the Previous Project, but less than under Alternative 3A that was previously analyzed in the Final EIR.

Earth-moving activities related to construction of the Revised Project at the St. Luke's Campus could damage or destroy previously unknown, unique paleontological resources. (Less than significant with mitigation)

The Final EIR concluded that the impact of the proposed development at St. Luke’s Campus under the Previous Project related to paleontological resources would be less than significant with implementation of Mitigation Measure M-CP-N3 at the proposed St. Luke’s Campus. Construction workers would be alerted to the possibility of encountering paleontological resources, and in the event that resources were encountered, fossil specimens would be recovered and recorded and would undergo appropriate curation.

The Colma Formation, which underlies all CPMC campuses, is considered a paleontologically sensitive rock formation because of its potential to contain unique paleontological resources. A slight increase in the amount of earthmoving activities would be required with the proposed development at St. Luke’s Campus under the Revised Project. This is due to an additional 9,000 cubic yards of excavation that would be required to accommodate the up to 5,500 sq. ft. of additional below-grade space within the St. Luke’s Campus Hospital under the Revised Project. Similar to the Previous Project, although no human remains have been listed or recorded at this campus, excavation related to the proposed development at St. Luke’s Campus under the Revised Project could disturb as yet-undiscovered human remains. The same mitigation measures would apply, Mitigation Measure M-CP-N3 (see Draft EIR page 4.4-47), which would require CPMC to retain a qualified paleontologist to train construction personnel and institute procedures in the event paleontological resources are discovered. If such resources are discovered during construction of the proposed development at St. Luke’s Campus under the Revised Project, Mitigation Measure M-CP-N3 would require cessation of work near the find until recommendations in a resource recovery plan have been implemented. Mitigation Measure M-CP-N4 (see Draft EIR page 4.4-49) would require CPMC to suspend work within 50 feet of any human remains, notify the San Francisco Planning Department and the county coroner, and that all such human remains and funerary objects discovered shall be treated in compliance with state and federal laws. Implementing these measures at St. Luke’s Campus under the Revised Project would reduce impacts on paleontological resources to a less-than-significant level, although impacts would be slightly greater than under the Previous Project due to the greater amounts of excavation, but less than under Alternative 3A that was previously analyzed in the Final EIR.

Construction activities at the St. Luke's Campus under the Revised Project could disturb as-yet-discovered human remains. (Less than significant with mitigation)

The Final EIR concluded that the impact of the proposed development at St. Luke’s Campus under the Previous Project related to the discovery of human resources would be less than significant with implementation of Mitigation Measure M-CP-N4 at the St. Luke’s Campus. Implementation of this measure would ensure that any potentially affected archaeological deposit would be identified, evaluated, and as appropriate, subject to data recovery by a qualified archaeologist under the oversight of the ERO.

As under the Previous Project, excavation related to the proposed development at St. Luke's Campus under the Revised Project could disturb as-yet-undiscovered human remains. This impact would be slightly greater under the Revised Project than under the Previous Project, because the amount of excavation required for the proposed development at St. Luke's Campus under the Revised Project would be greater than under the Previous Project. However, this impact would be slightly reduced under the Revised Project compared to under Alternative 3A, because the amount of excavation required for the proposed development at St. Luke's Campus under the Revised Project would be less than under Alternative 3A that was previously analyzed in the Final EIR. As under the Previous Project and Alternative 3A, this impact for the proposed development at St. Luke's Campus under the Revised Project would be less than significant with implementation of Mitigation Measure M-CP-N4 (see Draft EIR page 4.4-49).

3.5.2.1 SUMMARY OF CULTURAL RESOURCES IMPACTS AT THE ST. LUKE'S CAMPUS

The Final EIR concluded that the proposed development at St. Luke's Campus under the Previous Project would result in less-than-significant project-level and cumulative impacts related to cultural resources with the implementation of Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4. In accordance with CEQA and pursuant to Planning Department Preservation Bulletin 16, cumulative future development in the project area would be subject to review on a case-by-case basis. This process would reduce the cultural impacts of cumulative projects to less-than-significant levels. Therefore, the Previous Project at the St. Luke's Campus would have a less-than-significant cumulative impact related to cultural resources. Project-level and cumulative impacts of the proposed development at St. Luke's Campus under the Revised Project related to cultural resources would be similarly less than significant with implementation of Mitigation Measures M-CP-N2, M-CP-N3, and M-CP-N4, which is required under the Previous Project and Alternative 3A. Implementing these mitigation measures would reduce project-level and cumulative impacts of the proposed development at St. Luke's Campus under the Revised Project on historic, archaeological, and paleontological resources to less-than-significant levels. Impacts of the proposed development at St. Luke's Campus under the Revised Project would be slightly greater than under the Previous Project because of the increased excavation and construction that would be required for the St. Luke's Campus, but less than analyzed in the Final EIR for this campus under Alternative 3A.

3.6 TRANSPORTATION AND CIRCULATION

3.6.1 CATHEDRAL HILL CAMPUS

Under the Revised Project, the proposed Cathedral Hill Campus Hospital would have fewer beds when compared to the Previous Project. Because the proposed Cathedral Hill Campus Hospital under the Revised Project would be smaller than under the Previous Project, development at the Cathedral Hill Campus under the Revised Project would generate fewer net new total trips, including vehicle trips than under the Previous Project.

3.6.1.1 TRAFFIC IMPACTS OF REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Implementation of the Revised Project at the Cathedral Hill Campus would result in a significant impact at the intersection of Van Ness/Market. (Significant and Unavoidable)

The Final EIR concluded that implementation of the proposed Cathedral Hill Campus development under the Previous Project would degrade operations at the Van Ness Avenue/Market Street intersection during

the p.m. peak hour from Level of Service (LOS) D under 2015 Modified Baseline No Project conditions to LOS E under 2015 Modified Baseline plus Project conditions, resulting in a significant and unavoidable impact. The reduced size of the proposed Cathedral Hill Campus Hospital under the Revised Project, would result in less traffic than the Previous Project, but the impact at this intersection would continue to be significant and unavoidable (although less than under the Previous Project). Mitigation such as providing additional traffic lanes or otherwise increasing vehicular capacity at this intersection is not feasible because it would require narrowing of sidewalks to substandard widths, and/or demolition of buildings adjacent to these streets. Signal timing adjustments may improve intersection operations, but would likely be infeasible due to the necessity to balance traffic, transit or pedestrian signal timing requirements, which have largely already been incorporated into existing signal timing. Therefore, no feasible mitigation measures have been identified to reduce project impacts to less-than-significant levels.

Implementation of the Revised Project at the Cathedral Hill Campus would result in a significant impact at the intersection of Polk/Geary. (Significant and Unavoidable)

The Final EIR concluded that implementation of the proposed Cathedral Hill Campus development under the Previous Project would degrade operations at the Polk Street/Geary Street intersection during the a.m. peak hour from LOS D under 2015 Modified Baseline No Project conditions to LOS E under 2015 Modified Baseline plus Project conditions, and during the p.m. peak hour from LOS C under 2015 Modified Baseline No Project conditions to LOS E under 2015 Modified Baseline plus Project conditions, resulting in a significant and unavoidable impact. The reduced size of the proposed Cathedral Hill Campus Hospital under the Revised Project, would result in less traffic than under the Previous Project, but the impact at this intersection would continue to be significant and unavoidable (although less than under the Previous Project). Mitigation such as providing additional traffic lanes or otherwise increasing vehicular capacity at this intersection is not feasible because it would require narrowing of sidewalks to substandard widths, and/or demolition of buildings adjacent these streets. Signal timing adjustments may improve intersection operations, but would likely be infeasible due to the necessity to balance traffic, transit or pedestrian signal timing requirements, which have largely already been incorporated into existing signal timing. Therefore, no feasible mitigation measures have been identified to reduce project impacts to less-than-significant levels.

Implementation of the Revised Project at the Cathedral Hill Campus would have a less-than-significant impact at six study intersections that would operate at LOS E or LOS F under 2015 Modified Baseline No Project conditions and 2015 Modified Baseline plus Project conditions. (Less than significant)

The Final EIR concluded that under the Previous Project, six of the 26 study intersections in the proposed Cathedral Hill Campus vicinity would operate at LOS E or LOS F under both 2015 Modified Baseline No Project conditions and 2015 Modified Baseline plus Project conditions. Implementing projects at the proposed Cathedral Hill Campus under the Previous Project would make less-than-significant contributions of traffic to these six intersections. As discussed in the Final EIR, the proposed development at Cathedral Hill Campus under Alternative 3A would generate fewer vehicle trips than under the Previous Project and would also make a less-than-significant contribution of traffic to these intersections that would operate at LOS E and F. Similar to Alternative 3A, the proposed Cathedral Hill Campus Hospital under the Revised Project would have fewer beds and employees than under the Previous Project. Therefore, the proposed development at Cathedral Hill Campus under the Revised Project would generate fewer trips than under the Previous Project and would also have a less-than-significant contribution of traffic to these intersections that would operate at LOS E or F.

Implementation of the Revised Project at the Cathedral Hill Campus would have less-than-significant impacts at 18 study intersections that would operate at LOS D or better under 2015 Modified Baseline plus Project conditions. (Less than significant)

The Final EIR concluded that under the Previous Project, the proposed Cathedral Hill Campus would have less-than-significant impacts on 18 of the study intersections that would operate at LOS D or better under 2015 Modified Baseline plus Project conditions. The proposed Cathedral Hill Campus under Alternative 3A and under the smaller Revised Project would also have less-than-significant impacts on these intersections because the campus would generate fewer vehicle trips under the Revised Project and under Alternative 3A, than under the Previous Project. Impacts on these intersections would be less than significant under the Revised Project, and less than under the Previous Project.

Operation of the Cathedral Hill Campus parking garages under the Revised Project would have a less-than-significant impact on traffic operations because inbound peak period queues would not spill back into adjacent travel lanes. (Less than significant)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) on traffic from parking garage operations would be less than significant because the vehicle queue for the parking could be accommodated at all three proposed Cathedral Hill Campus garages and would not result in spillback into traffic. As under the Previous Project (and under Alternative 3A), parking garages for the proposed Cathedral Hill Campus under the Revised Project would be provided at the proposed Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB, and 1375 Sutter MOB. The garage design as it relates to circulation would be the same as under the Previous Project. The proposed development at Cathedral Hill Campus under the Revised Project would result in less traffic than under the Previous Project, and therefore would accommodate peak-period queues and would not result in spillback to adjacent travel lanes. Impacts of the proposed development at Cathedral Hill Campus under the Revised Project would be similar to the impacts under the Previous Project and also would be less than significant.

If the proposed Van Ness Avenue Bus Rapid Transit (BRT) and Geary Corridor BRT projects are implemented, the contribution of the Revised Project at the Cathedral Hill Campus to the combined impact of the Cathedral Hill and BRT projects at five of the BRT study intersections would be less than significant. (Less than significant)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to the combined impact of the Van Ness Avenue BRT and Geary Corridor BRT projects on five BRT study intersections would be less than significant. A sensitivity analysis of the combined impact of the proposed Cathedral Hill Campus under the Previous Project and the BRT projects determined that the two of the study intersections (Van Ness Avenue/Geary and Van Ness Avenue/Broadway) would operate at LOS D or better under 2015 Modified Baseline plus Project conditions, and that the contributions of the near-term projects (hospital and MOB) at the Cathedral Hill Campus under the Previous Project to the critical movements at three intersections that would operate at LOS E or LOS F conditions (Gough Street/Geary Boulevard, Van Ness Avenue/Fell Street, and Van Ness Avenue/Hayes Street) would be less than significant. Therefore, the Final EIR concluded that this impact would be less than significant at these five study intersections under the Previous Project. As under the Previous Project (and Alternative 3A), development of the proposed Cathedral Hill Campus under the Revised Project would not result in a significant contribution to the combined impact of the Cathedral Hill Campus and BRT projects at five intersections (Gough Street/Geary Boulevard, Van Ness Avenue/Fell Street, Van Ness Avenue/Hayes Street, Van Ness Avenue/Geary, and Van Ness Avenue/Broadway) if the BRT projects were implemented.

If the proposed Van Ness Avenue BRT and Geary Corridor BRT projects are implemented, the contribution of the Revised Project at the Cathedral Hill Campus to the combined impact of the Cathedral Hill and BRT projects would be significant at the intersection of Polk/Geary. (Significant and unavoidable)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related the combined impact of the Van Ness Avenue and Geary Corridor BRT projects at the intersection of Polk Street/Geary Street would be significant and unavoidable. The sensitivity analysis of the combined impact of the proposed Cathedral Hill Campus under the Previous Project with the BRT projects had determined that the contributions of the near-term projects at the proposed Cathedral Hill Campus to critical movements at this intersection, which would operate at LOS E under 2015 Modified Baseline plus Project conditions with the proposed BRT projects during both the a.m. and p.m. peak hours, would be less than significant. However, the analysis of the impacts of the Previous Project at the proposed Cathedral Hill Campus without the BRT projects had concluded that a significant and unavoidable impact would occur at this intersection, and no feasible mitigation measures could be identified. Therefore, the Final EIR concluded that this significant and unavoidable impact determination would also apply to the sensitivity analysis. As under the Previous Project and under Alternative 3A, development of the proposed Cathedral Hill Campus under the Revised Project, would make a significant contribution to the traffic impact identified for the combined Cathedral Hill Campus and BRT projects at the intersection of Polk Street/Geary. The reduced size of the proposed Cathedral Hill Campus Hospital under the Revised Project would result in less traffic than the Previous Project, but the impact at this intersection would continue to be significant and unavoidable (although less than under the Previous Project) and no feasible mitigation measures could be identified.

If the proposed Van Ness Avenue BRT and Geary Corridor BRT projects are implemented, the contribution of the Revised Project at the Cathedral Hill Campus to the combined impact of the Cathedral Hill and BRT projects would be significant at the intersection of Van Ness/Market. (Significant and unavoidable)

The Final EIR concluded that the contribution of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) to the combined impact of the Cathedral Hill Campus and BRT projects at the intersection of Van Ness Avenue/Market Street would be significant and unavoidable. The analysis of the impacts of the Previous Project at the Cathedral Hill Campus without the BRT projects had concluded that a significant and unavoidable impact would occur at this intersection, and no feasible mitigation measures could be identified. As under the Previous Project and under Alternative 3A, development of the proposed Cathedral Hill Campus under the Revised Project would make a significant contribution to the traffic impact identified for the combined Cathedral Hill Campus and BRT projects at the intersection of Van Ness/Market. The reduced size of the proposed Cathedral Hill Campus Hospital under the Revised Project would result in less traffic than the Previous Project, but the impact at this intersection would continue to be significant and unavoidable (although less than under the Previous Project) and no feasible mitigation measures could be identified.

Implementation of the Revised Project at the Cathedral Hill Campus would result in significant project and cumulative impacts at the intersection of Van Ness/Market. (Significant and unavoidable)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project related to the Van Ness Avenue/Market Street would be significant and unavoidable. As explained in Section 3.6.1 above, additional project trips during the p.m. peak hour would degrade operations at this intersection from LOS D to LOS E under 2015 Modified Baseline plus Project conditions and no feasible mitigation measures have been identified to reduce cumulative impacts to less-than-significant levels. As explained above, implementation of the proposed Cathedral Hill Campus

under the Previous Project would result in a significant impact under 2015 Modified Baseline plus Project conditions at the Van Ness Avenue/Market Street intersection. This would be considered a significant cumulative traffic impact. The reduced development of the proposed Cathedral Hill Campus Hospital under the Revised Project would result in less traffic at this intersection, but this impact would continue to be considered a significant and unavoidable cumulative impact at this intersection and no feasible mitigation measures could be identified, although the impact would be reduced in comparison to the Previous Project.

Implementation of the Revised Project at the Cathedral Hill Campus would result in a significant cumulative impact at the intersection of Van Ness/Pine. (Significant and unavoidable)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to the Van Ness Avenue/Pine Street intersection would be significant and unavoidable. Additional project trips during the p.m. peak hour would degrade operations at this intersection from LOS D under 2030 Cumulative No Project Conditions to LOS E under 2030 Cumulative plus Project conditions, and no feasible mitigation measures have been identified to reduce project impacts to less-than-significant levels. Implementation of the proposed Cathedral Hill Campus under the Previous Project would degrade operations at the Van Ness Street/Pine Street intersection from LOS D under 2030 Cumulative No Project conditions to LOS E under 2030 Cumulative plus Project conditions during the p.m. peak hour. This would be considered a significant cumulative traffic impact. The reduced development of the proposed Cathedral Hill Campus Hospital under the Revised Project would result in less traffic at this intersection, but this impact would continue to be considered a significant and unavoidable cumulative impact at this intersection and no feasible mitigation measures could be identified, although the impact would be reduced in comparison to the Previous Project.

Implementation of the Revised Project at the Cathedral Hill Campus would result in a significant project and cumulative impact at the intersection of Polk/Geary. (Significant and unavoidable)

The Final EIR concluded that implementation of the proposed Cathedral Hill Campus development under the Previous Project would degrade operations at the Polk Street/Geary Street intersection from LOS D under 2030 Cumulative No Project conditions to LOS E under 2030 Cumulative plus Project conditions during the p.m. peak hour. In addition, implementation of the proposed Cathedral Hill Campus development under the Previous Project would result in a significant impact at this intersection under 2015 Modified Baseline plus Project conditions. This would be considered a significant cumulative traffic impact. The reduced development of the proposed Cathedral Hill Campus Hospital under the Revised Project would result in less traffic at this intersection, but this impact would continue to be considered a significant and unavoidable cumulative impact at this intersection and no feasible mitigation measures could be identified, although the impact would be reduced in comparison to the Previous Project.

Implementation of the Revised Project at the Cathedral Hill Campus would have less-than-significant impacts at eight study intersections that would operate at LOS E or LOS F under 2030 Cumulative No Project conditions. (Less than significant)

The Final EIR concluded that implementation of the proposed Cathedral Hill Campus development under the Previous Project would not contribute significantly to poor operating conditions at eight of the 26 study intersections in the proposed Cathedral Hill Campus vicinity that would operate at LOS E or LOS F under both 2030 Cumulative No Project conditions and 2030 Cumulative plus Project conditions. Therefore, the Final EIR concluded that this impact would be less than significant for the proposed Cathedral Hill Campus development under the Previous Project. The proposed Cathedral Hill Campus

development under the Revised Project (similar to Alternative 3A) would generate fewer vehicle trips than the development under the Previous Project, and therefore would also make a less-than-significant contribution of traffic to these intersections. Impacts on these intersections would be less than significant with the proposed development at Cathedral Hill Campus under the Revised Project, and less than under the Previous Project.

Implementation of the Revised Project at the Cathedral Hill Campus would have less-than-significant impacts at 17 study intersections that would operate at LOS D or better under 2030 Cumulative plus Project conditions. (Less than significant)

The Final EIR concluded that with implementation of the proposed Cathedral Hill Campus development under the Previous Project, traffic at 17 study intersections would continue to operate at LOS D or better during the a.m. and p.m. peak hours under 2030 Cumulative plus Project conditions. Therefore, the Final EIR concluded that this impact would be less than significant for the proposed Cathedral Hill Campus development under the Previous Project. The proposed Cathedral Hill Campus development under the Revised Project (similar to Alternative 3A) would generate fewer vehicle trips than under the Previous Project, and therefore would also make a less-than-significant contribution to traffic at these intersections. Impacts on these intersections would be less than significant with the proposed development at Cathedral Hill Campus under the Revised Project, and less than under the Previous Project.

3.6.1.2 TRANSIT IMPACTS OF REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Implementation of the Revised Project at the Cathedral Hill Campus would not cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity under 2015 Modified Baseline plus Project conditions or 2030 Cumulative plus Project conditions. (Less than significant)

The number of net new transit trips generated by the proposed development at Cathedral Hill Campus under the Revised Project would be fewer than under the Previous Project because of the reduced number of beds at the Cathedral Hill Campus Hospital.⁸ All four transit corridors would operate at less than the San Francisco Municipal Railway's (Muni's) 85 percent capacity utilization standards with the proposed development at Cathedral Hill Campus under the Previous Project and would operate similarly with the Revised Project; thus, project-level and cumulative impacts on transit capacity would be less than significant.

Implementation of the Revised Project at the Cathedral Hill Campus would increase congestion and ridership along Van Ness Avenue, Geary Street, and Polk Street which would increase travel times and impact operations of the 49-Van Ness-Mission, 38/38L-Geary, and 19-Polk bus routes, respectively, under 2015 Modified Baseline plus Project conditions. (Significant and unavoidable with mitigation)

The Final EIR concluded that the impacts of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to increased congestion and transit ridership delays along the 49-Van Ness-Mission, 38/38L-Geary, and 19-Polk bus routes under 2015 Modified Baseline plus Project conditions would be significant and unavoidable. Under 2015 Modified Baseline plus Project conditions, implementation of the Previous Project at the proposed Cathedral Hill Campus would result in increases in travel time on the northbound 49-Van Ness-Mission during the a.m. peak hour and on the southbound 19-Polk bus route during the p.m. peak hour, which would be more than half of the San

⁸ Fehr & Peers, Memorandum to Sue Mickelsen, S.F. Planning Department, re: DRAFT – CPMC Revised Cathedral Hill Campus and St. Luke's Campus Project Description Sensitivity Analysis (Mar. 11, 2013).

Francisco Municipal Transportation Agency (SFMTA) proposed headways for those routes. Further, the results of SFMTA's cost/scheduling model indicated that, as a result of the Previous Project, additional buses would be needed on the 49-Van Ness-Mission and 38/38L-Geary bus routes during the a.m. and p.m. peak hours. Therefore, project-related transit delays resulting from congestion on study area roadways and passenger loading delays associated with increased ridership on the operation of these bus routes during the a.m. and p.m. peak hours would result in significant transit operational impacts. The Final EIR concluded that these impacts would remain significant and unavoidable even with implementation of Mitigation Measures MM-TR-29, MM-TR-30, and MM-TR-31, because the feasibility of these mitigation measures was unknown.

As under the Previous Project, development of the reduced proposed Cathedral Hill Campus under the Revised Project would increase the number of vehicle trips along Van Ness Avenue relative to existing conditions. Thus, the proposed development at Cathedral Hill Campus under the Revised Project would also result in similar transit delays on the same transit lines, resulting in similar or fewer significant impacts⁹ compared to the Previous Project. Implementing Mitigation Measures MM-TR-29, MM-TR-30, and MM-TR-31 for the proposed development at Cathedral Hill Campus under the Revised Project would require CPMC to financially compensate SFMTA for impacts on the service levels of the affected transit lines mentioned above. However, because the ability of SFMTA to provide the additional service on these lines is uncertain, the feasibility of the mitigation measures is unknown. Therefore, under the Revised Project, project-level impacts of the proposed development at Cathedral Hill Campus under the Revised Project would remain significant and unavoidable, but to a lesser degree when compared to the Previous Project.

Implementation of the Revised Project at the Cathedral Hill Campus would increase congestion and ridership along Van Ness Avenue, Geary Street, Polk Street, and Post Street which would increase travel times and impact operations of the 49-Van Ness-Mission, 47-Van Ness, 38/38L-Geary, 19-Polk, and 3-Jackson bus routes under 2030 Cumulative plus Project conditions. (Significant and unavoidable with mitigation)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to increased congestion and transit ridership delays would be significant and unavoidable. Under 2030 Cumulative plus Project conditions, implementation of the Previous Project at the proposed Cathedral Hill Campus would result in increases in travel time on the northbound 49-Van Ness-Mission bus route during the a.m. peak hour and on the southbound 19-Polk bus route during the p.m. peak hour, which would be more than half of the SFMTA proposed headways for those routes. Further, the results of SFMTA's cost/scheduling model indicated that additional buses would be needed on the 49-Van Ness-Mission, 47-Van Ness, 38/38L Geary, 19-Polk, and 3-Jackson bus routes during, variously, the a.m. and p.m. peak hours. Therefore, project-related transit delays resulting from congestion on study area roadways and passenger loading delays associated with increased ridership on operation of these bus routes during the a.m. and p.m. peak hours would result in significant transit operational impacts. The Final EIR concluded that these impacts would remain significant and unavoidable even with implementation of Mitigation Measures TR-29, TR-30, TR-31, TR-134, and TR-137, because the feasibility of these mitigation measures was unknown.

Under the 2030 Cumulative plus Project conditions, the increased congestion and ridership with the proposed development at Cathedral Hill Campus under the Previous Project would cause operational delays to Muni lines transit lines. Because it would add the same or fewer vehicle trips and transit riders

⁹ 49-Van Ness-Mission (AM and PM peak hours), 38, 38L-Geary (AM and PM peak hours), and 19-Polk (PM peak hour)

to the corridor, the proposed development at Cathedral Hill Campus under the Revised Project would result in similar transit delays on the same transit lines,¹⁰ resulting in the same or fewer significant cumulative impacts as the Previous Project, although to a lesser degree when compared to the Previous Project. Implementing Mitigation Measures TR-29, TR-30, TR-31, TR-134, and TR-137 for the proposed development at Cathedral Hill Campus under the Revised Project would require CPMC to financially compensate SFMTA for impacts on the service levels of the affected transit lines mentioned above. However, because the ability of SFMTA to provide the additional service on these lines is uncertain, the feasibility of the mitigation measure is unknown. Therefore, under the Revised Project, cumulative impacts of the proposed development at Cathedral Hill Campus would remain significant and unavoidable.

3.6.1.3 BICYCLE IMPACTS OF REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Implementation of the Revised Project at the Cathedral Hill Campus would not create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the project site and adjoining areas. (Less than significant)

The Final EIR concluded that the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) would not interfere with implementation of the elements of the San Francisco Bicycle Plan on Polk Street and that the project included a feature (one on-street parking space on the west side of Polk Street immediately north of Cedar Street would be removed and replaced with a curb extension) that would ensure that potential vehicular-bicycle conflicts between vehicles that are exiting the Cathedral Hill Campus MOB parking garage at Polk Street and bicyclists would be minimized. Therefore, the Final EIR concluded that the Previous Project's impact on bicyclists at the Cathedral Hill Campus would be less than significant.

The proposed development at Cathedral Hill Campus under the Revised Project would result in a fewer vehicle and bicycle trips compared to the under the Previous Project. As under the Previous Project, under the Revised Project, the Cathedral Hill Campus MOB's parking garage exit onto Cedar Street could increase conflicts between vehicles that are exiting the MOB parking garage at Polk Street and bicyclists. As under the Previous Project, under the Revised Project, one on-street parking space on the west side of Polk Street immediately north of Cedar Street would be removed and replaced with a curb extension. This would reduce the impact associated with vehicle/bicyclist conflicts to a less-than-significant level for the proposed development at Cathedral Hill Campus under the Revised Project. The proposed development at Cathedral Hill Campus under the Revised Project would not create any different potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the campus as compared to the Previous Project, thus, bicycle impacts would remain less than significant and would be reduced in comparison to the Previous Project.

¹⁰ 49-Van Ness-Mission (AM and PM peak hours), 47-Van Ness (PM peak hour), 38/38L-Geary (AM and PM peak hours), 19-Polk (PM peak hour), and 3-Jackson (PM peak hour)

3.6.1.4 PEDESTRIAN IMPACTS OF THE REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Implementation of the Revised Project at the Cathedral Hill Campus would not result in substantial overcrowding on public sidewalks, create hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the project site or adjoining areas. (Less than significant)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to pedestrians would be less than significant. The Previous Project included sidewalk widening and crosswalk improvements to facilitate pedestrian access and the pedestrian trips generated by the Revised Project could be accommodated on the existing and proposed nearby sidewalks without substantially affecting pedestrian conditions. In addition, the Final EIR determined that implementation of Improvement Measure I-TR-40 would further reduce the less-than-significant impact by requiring pedestrian countdown signals at intersections in the immediate vicinity of the campus.

The proposed development at Cathedral Hill Campus under the Revised Project assumes implementation of the same sidewalk and crosswalk improvements as described for the Previous Project. The proposed development at Cathedral Hill Campus under the Revised Project would result in a similar number or fewer pedestrian trips compared to the Previous Project, thus, similar to the Previous Project, the pedestrian trips generated by the Revised Project could be accommodated on the existing and proposed nearby sidewalks without substantially affecting pedestrian conditions. The proposed development at Cathedral Hill Campus under the Revised Project would not create different potentially hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the project site or adjoining areas. Pedestrian impacts at the proposed Cathedral Hill Campus under the Revised Project would be less than significant, and less than under the Previous Project.

3.6.1.5 LOADING IMPACTS OF REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Implementation of the Revised Project at the Cathedral Hill Campus would not result in a loading demand during the peak hours of loading activities that could not be accommodated within the proposed loading supply, or within on-street loading zones. (Less than significant)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to loading activities would be less than significant. The loading facilities could accommodate the demand for related loading operations at the campus and the Previous Project included a truck management plan for the proposed Cathedral Hill Campus to efficiently manage the loading facilities to ensure that the daytime loading demand would be accommodated. Under the Revised Project, the proposed Cathedral Hill Campus would provide 20 loading spaces, the same number as under the Previous Project. CPMC would implement the same or similar truck management plan for the proposed Cathedral Hill Campus under the Revised Project, as under the Previous Project to ensure that the daytime loading demand is accommodated. Because loading demand would be somewhat less under the Revised Project than under the Previous Project, loading would be accommodated with the proposed loading supply or within on-street loading zones, and impacts would be less than significant, and less than under the Previous Project.

Implementation of the Revised Project at the Cathedral Hill Campus and subsequent operation of the hospital off-street loading facility could result in potentially hazardous conditions on Franklin Street. (Less than significant with mitigation)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to operations at the hospital off-street loading facility resulting in potentially hazardous conditions on Franklin Street would be less than significant with mitigation. Implementation of Mitigation Measure M-TR-44 would require a loading dock attendant and would reduce impacts related to loading operations for trucks 46 feet or longer.

As under the Previous Project, under the Revised Project, operation of the proposed Cathedral Hill Campus Hospital's off-street loading facility could result in potentially hazardous conditions on Franklin Street, which is a major arterial street with large platoons of vehicles during substantial portions of the day. As under the Previous Project, implementing Mitigation Measure M-TR-44 (see Draft EIR page 4.5-139 of the Draft EIR) with the proposed development at Cathedral Hill Campus under the Revised Project would require a loading dock attendant and would reduce impacts related to loading operations for trucks 46 feet or longer. Implementing this measure would reduce loading impacts of the proposed development at Cathedral Hill Campus under the Revised Project to less-than-significant levels. Loading impacts for the proposed development at Cathedral Hill Campus under the Revised Project would therefore, be less than significant with mitigation.

Implementation of the Revised Project at the Cathedral Hill Campus relevant to the passenger loading/unloading demand would be accommodated within the proposed passenger loading/unloading zones, and would not create potentially hazardous conditions. (Less than significant)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to passenger loading/unloading would be less than significant, because the passenger zone could accommodate adequate vehicle demand during peak a.m. and p.m. times. The emergency room would have a separate passenger loading/unloading zone during peak times; therefore, the passenger loading demand would be accommodated within the proposed supply. In addition, CPMC would actively manage the passenger loading/unloading zones.

Passenger loading/unloading demand for the proposed development at Cathedral Hill Campus under the Revised Project would be less than under the Previous Project, because of the reduced size of the proposed Cathedral Hill Campus Hospital. As under the Previous Project, the proposed Cathedral Hill Campus Hospital under the Revised Project would have an interior passenger loading/unloading zone as well as a separate passenger loading/unloading zone for the emergency room. The proposed Cathedral Hill Campus MOB and 1375 Sutter MOB under the Revised Project would also have on-street loading/unloading zones. Passenger loading and unloading would be accommodated within these zones under the Revised Project, because the number of passenger trips would be less than under the Previous Project. Loading impacts would be less than significant under the Revised Project and less than under the Previous Project. As under the Previous Project, no mitigation measures are required under the Revised Project.

3.6.1.6 EMERGENCY VEHICLE ACCESS IMPACTS OF THE REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Implementation of the Revised Project at the Cathedral Hill Campus would not result in a significant emergency vehicle impact. (Less than significant)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to emergency vehicles would be less than significant. Likely routes to the hospital are multi-lane arterial roadways that allow emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle. In addition, Franklin Street, Van Ness Avenue, Post Street, and Bush Street have multiple lanes, enabling vehicles to yield to emergency vehicles en route to the Cathedral Hill Campus. As under the Previous Project, the emergency room at the proposed Cathedral Hill Campus under the Revised Project would replace the existing emergency rooms at CPMC's Pacific and California Campuses. As under the Previous Project, the proposed Cathedral Hill Campus Hospital under the Revised Project would be accessible by multi-lane arterial roadways in the project vicinity, which would allow emergency vehicles to travel at higher speeds. Emergency vehicle access impacts at the proposed Cathedral Hill Campus under the Revised Project would be less than significant, and less than under the Previous Project. As under the Previous Project, no mitigation measures are required for the proposed Cathedral Hill Campus under the Revised Project.

3.6.1.7 CONSTRUCTION IMPACTS OF THE REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Implementation of the Revised Project at the Cathedral Hill Campus would result in a transportation impact in the project vicinity resulting from construction vehicle traffic and construction activities that would affect the transportation network. (Significant and unavoidable with mitigation)

The Final EIR concluded that the impact of the proposed development at Cathedral Hill Campus under the Previous Project (and Alternative 3A) related to construction traffic and activities would be significant and unavoidable with mitigation for the reasons discussed below. The Final EIR concluded that implementation of Mitigation Measure M-TR-55, which requires a construction transportation management plan, would help to reduce impacts, but impacts would remain significant and unavoidable.

Construction activities associated with the proposed development at Cathedral Hill Campus under the Revised Project would be similar to those under the Previous Project; however, the construction period would likely be shorter because of the reduced size of the Cathedral Hill Campus Hospital. Construction of the Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB and Van Ness Avenue pedestrian tunnel under the Revised Project would include lane closures, sidewalk closures, construction gates, and truck routes at the construction site as the Final EIR analyzed for the Previous Project in Impact TR-55 (see Draft EIR at pages 4.5-147 through 4.5-160). Under the Previous Project, closure of lanes on Van Ness Avenue during construction of the proposed pedestrian tunnel would be considered a significant impact on the intersections of Van Ness/Geary, Van Ness/Post and Van Ness/O'Farrell. This impact would be similar under the Revised Project. Because of the extent and duration of construction activities, construction-related impacts on traffic, pedestrians, transit, and intersection operations would be significant for the proposed development at Cathedral Hill Campus under the Revised Project. Implementation of Mitigation Measure M-TR-55 (see Draft EIR at page 4.5-159) for the proposed development at Cathedral Hill Campus under the Revised Project, which would require CPMC and the construction contractor to prepare a construction transportation management plan, would reduce some of

the impacts. Impacts for the proposed development at Cathedral Hill Campus under the Revised Project would remain significant and unavoidable, but to a somewhat lesser degree than under the Previous Project because of the reduced amount of construction at the proposed Cathedral Hill Campus Hospital.

3.6.1.8 PARKING DISCUSSION FOR THE REVISED PROJECT AT THE CATHEDRAL HILL CAMPUS

Under the Revised Project, a total of 990 parking spaces would be provided at the proposed Cathedral Hill Campus for the reduced-size Cathedral Hill Campus Hospital and the Cathedral Hill Campus MOB and renovated 1375 Sutter MOB. The Revised Project would provide 237 fewer spaces at Cathedral Hill Campus than the Previous Project (which would provide a total of 1,227 spaces). As with the Previous Project, under the Revised Project, there would be both an overall parking shortfall and a parking shortfall for employees as compared to parking demand, although the amount of parking provided would comply with minimum Planning Code requirements. It is anticipated that short-term visitors to the campus unable to find parking would likely park in any available on-street parking space around the campus. Employees unable to park at the campus could take transit, bicycle, walk to the campus, or park off-site at the Japan Center Garage. As set forth in and discussed in the Final EIR, CPMC's proposed enhanced Transportation Demand Management ("TDM") program would expand CPMC's current TDM program in order to further discourage the use of private automobiles. As explained on page C&R 3.9-33 of the Final EIR, the proposed additions to the current TDM program would result in approximately 15-20 percent reductions of both vehicle trips and parking demand as compared to the projected trip and parking generation calculated in the Draft EIR.

In San Francisco, parking supply is not considered a permanent physical condition, and changes in the parking supply are not considered to be a significant impact under CEQA, but rather a social effect. However, to the extent that a parking shortfall could be considered a potential impact under CEQA, this impact would be considered to be less than significant because parking supply requirements implement City policies intended to reduce citywide traffic congestion and air quality effects by reducing the number of persons using single-occupancy vehicles, such as the City's "Transit First" policy. In addition, any impact would be considered less than significant because of the availability of alternative transportation modes at the proposed Cathedral Hill Campus, incentives provided by CPMC's enhanced TDM program to utilize such alternative transportation modes, the ability of short-term visitors to the campus to utilize available on-street parking spaces around the campus, as described on pages 4.5-46 to 4.5-47 of the Draft EIR, and the ability of employees to park off-site at the Japan Center Garage.

3.6.1.9 SUMMARY OF TRANSPORTATION IMPACTS AT THE CATHEDRAL HILL CAMPUS

The Final EIR concluded that the proposed development at Cathedral Hill Campus under the Previous Project would result in certain significant and unavoidable project-level and cumulative impacts related to transportation, as identified above. Due to the reduced size of the proposed Cathedral Hill Campus Hospital under the Revised Project, a reduction in vehicle, transit, bicycle, and pedestrian trips would occur. Vehicular, transit, bicycle, and pedestrian access and circulation patterns would remain the same as under the Previous Project. Therefore, transportation and circulation impacts under the Revised Project at the proposed Cathedral Hill Campus would be similar to, although less than, the impacts under the Previous Project. None of the significance conclusions in the Final EIR regarding impacts of the Previous Project would change. Although impacts would be reduced to a degree, all mitigation measures and improvement measures identified in the Final EIR, as applicable to the Previous Project, would also continue to apply under the Revised Project.

3.6.2 ST. LUKE'S CAMPUS

The development program at the St. Luke's Campus would be greater under the Revised Project than under the Previous Project, but smaller than under Alternative 3A, and would result in an increase in vehicle trips during the p.m. peak hour (81 additional trips) under the Revised Project in comparison to the Previous Project, but fewer vehicle trips during the p.m. peak hour than under Alternative 3A (17 fewer vehicle trips), and would not result in any new significant impacts on the study intersections.¹¹

3.6.2.1 TRAFFIC IMPACTS OF THE REVISED PROJECT AT THE ST. LUKE'S CAMPUS

Implementation of the Revised Project at the St. Luke's Campus would have less-than-significant impacts at six study intersections that would operate at LOS E or LOS F under 2015 Modified Baseline No Project conditions and 2015 Modified Baseline plus Project conditions. (Less than significant)

Under the Previous Project, six of the 15 study intersections in the St. Luke's Campus vicinity would operate at LOS E or LOS F under both 2015 Modified Baseline No Project conditions and 2015 Modified Baseline plus Project conditions. The Final EIR concluded that the impacts at these intersections under the Previous Project would be less than significant because the Previous Project would not contribute considerably to the critical movements of these intersections. The EIR also determined that impacts at these intersections would be less than significant under Alternative 3A, which would have resulted in a greater increase in vehicle trips as compared to the Previous Project than would be added under the Revised Project. The development program at the St. Luke's Campus would be greater under the Revised Project than under the Previous Project, but less than under Alternative 3A. Therefore, impacts under the Revised Project would be less than significant, although greater than under the Previous Project because of the increased number of vehicle trips, but less than under Alternative 3A.

Implementation of the Revised Project at the St. Luke's Campus would have less-than-significant impacts at nine study intersections that would operate at LOS D or better under 2015 Modified Baseline plus Project conditions. (Less than significant)

Under the Previous Project, nine of the 15 study intersections at the St. Luke's Campus vicinity would operate at LOS D or better under 2015 Modified Baseline plus Project conditions during the a.m. and p.m. peak hours. The Final EIR concluded that the impacts at these intersections under the Previous Project and Alternative 3A would be less than significant. The development program at the St. Luke's Campus would be greater under the Revised Project than under the Previous Project, but less than under Alternative 3A. Therefore, impacts under the Revised Project would be less than significant, although greater than under the Previous Project because of the increased number of vehicle trips, but less than under Alternative 3A.

Implementation of the Revised Project at the St. Luke's Campus would have less-than-significant impacts at six study intersections that would operate at LOS E or LOS F under 2030 Cumulative No Project conditions and 2030 Cumulative plus Project conditions. (Less than significant)

Under the Previous Project, six of the 15 study intersections would operate at LOS F during the p.m. peak hour under both 2030 Cumulative No Project Conditions and 2030 Cumulative plus Project conditions. The EIR concluded that operations at the St. Luke's Campus under both the Previous Project and

¹¹ Fehr & Peers, Memorandum to Sue Mickelsen, S.F. Planning Department, re: DRAFT – CPMC Revised Cathedral Hill Campus and St. Luke's Campus Project Description Sensitivity Analysis (Mar. 11, 2013).

Alternative 3A would not contribute considerably to the critical movements at these intersections, and therefore, this impact would be less than significant under both the Previous Project and Alternative 3A. Operations at the St. Luke's Campus would contribute more vehicle trips under the Revised Project than under the Previous Project, but less than under Alternative 3A. Therefore, this impact under the Revised Project would be less than significant, although greater than under the Previous Project, but less than under Alternative 3A.

Implementation of the Revised Project at the St. Luke's Campus would have less-than-significant impacts at nine study intersections that would operate at LOS D or better under 2030 Cumulative plus Project conditions. (Less than significant)

Under the Previous Project, nine of the 15 study intersections at the St. Luke's Campus vicinity would operate at LOS D or better under 2030 Cumulative plus Project conditions. The EIR concluded that the impacts at these intersections under the Previous Project and Alternative 3A would be less than significant. The development program at the St. Luke's Campus would be greater under the Revised Project than under the Previous Project, but less than under Alternative 3A. Therefore, impacts under the Revised Project would be less than significant, although greater than under the Previous Project because of the increased number of vehicle trips, but less than under Alternative 3A.

3.6.2.2 TRANSIT IMPACTS OF THE REVISED PROJECT AT THE ST. LUKE'S CAMPUS

Implementation of the Revised Project at the St. Luke's Campus would not cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service under 2015 Modified Baseline plus Project conditions or 2030 Cumulative plus Project conditions. (Less than significant)

The Final EIR determined that the Previous Project at the St. Luke's Campus would add 71 net new transit trips during the p.m. peak hour compared to existing conditions, and concluded that this would result in a less-than-significant impact, because this additional demand could be accommodated by existing transit capacity. The Revised Project would generate additional transit riders compared to the Previous Project because of the increased development program (but less than under Alternative 3A). The Revised Project would add 98 net-new transit trips from existing conditions, 27 trips more than the project analyzed in the EIR, and 71 less transit trips than under Alternative 3A. The transit demand under the Revised Project could be accommodated during the p.m. peak hour and all four corridors would continue to operate at less than Muni's 85 percent capacity utilization standards. The Revised Project would not cause a substantial increase in transit demand that could not be accommodated by adjacent transit capacity or a significant increase in ridership demand for CPMC shuttle service, resulting in unacceptable levels of transit service; nor would it cause a substantial increase in operating delay or costs such that significant adverse impacts in transit service would occur. Project-level and cumulative impacts on transit would be less than significant under the Revised Project. As under the Previous Project, no mitigation measures are required at the St. Luke's Campus under the Revised Project.

3.6.2.3 BICYCLE IMPACTS OF THE REVISED PROJECT AT THE ST. LUKE'S CAMPUS

Implementation of the Revised Project at the St. Luke's Campus would not create potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the project site and adjoining areas. (Less than significant)

The Final EIR determined that the Previous Project would add nine net new "other" trips during the p.m. peak hour compared to existing conditions, of which a portion are expected to be bicycle trips. The Final EIR concluded that impacts related to bicyclists would be less than significant because, while there would

be an increase in the number of vehicles in the vicinity, these new trips would not affect bicycle travel in the area.

Like the Previous Project, the Revised Project would not include any design elements that would inhibit bicycle activity in the campus vicinity and would not interfere with implementation of the bicycle lanes contemplated in the Bicycle Plan on Cesar Chavez Street. The Revised Project would add 13 net-new “other” trips during the p.m. peak hour over existing conditions. This is four trips more than under the Previous Project. Implementation of the Revised Project at the St. Luke’s Campus would not create any potentially hazardous conditions for bicyclists or otherwise substantially interfere with bicycle accessibility to the project site and adjoining areas. Relative to the Previous Project, the additional 4 “other” trips during the p.m. peak hour under the Revised Project would be a negligible change and would not affect bicycle travel in the area. Bicycle impacts of the Revised Project at St. Luke’s would be less than significant. As under the Previous Project, no mitigation measures are required at the St. Luke’s Campus under the Revised Project.

3.6.2.4 PEDESTRIAN IMPACTS OF THE REVISED PROJECT AT THE ST. LUKE’S CAMPUS

Implementation of the Revised Project at the St. Luke’s Campus would not result in substantial overcrowding on public sidewalks, create hazardous conditions for pedestrians, or otherwise interfere with pedestrian accessibility to the project site or adjoining areas. (Less than significant)

The Final EIR determined that the Previous Project would add 94 net new pedestrian trips to existing conditions during the p.m. peak hour. The Final EIR concluded that pedestrian impacts would be less than significant, because new pedestrian trips would not result in substantial overcrowding on the sidewalks or hazardous conditions. In addition, the Final EIR concluded that Improvement Measure I-TR-88 would further reduce less-than-significant impacts by requiring pedestrian crosswalks at the unsignalized intersection of San Jose Avenue/27th Street.

Under the Revised Project, the pedestrian network in the vicinity of the St. Luke’s Campus would be similar to that proposed under the Previous Project. The Revised Project would add 130 net-new pedestrian trips during the p.m. peak hour (including the 98 net-new transit trips to account for walking trips to and from the Muni bus stops). Although this would be 36 more pedestrian trips than under the Previous Project, the existing pedestrian volumes in the study area were observed to be low to moderate. Therefore, the net-new pedestrian trips under the Revised Project, including those in addition to the Previous Project trips, could be adequately accommodated without substantially affecting pedestrian conditions and would not result in overcrowding of sidewalks or crosswalks. Pedestrian impacts at St. Luke’s under the Revised Project would be less than significant. As under the Previous Project, no mitigation measures are required at the St. Luke’s Campus under the Revised Project.

3.6.2.5 LOADING IMPACTS OF THE REVISED PROJECT AT THE ST. LUKE’S CAMPUS

Implementation of the Revised Project at the St. Luke’s Campus would not result in a loading demand during the peak hours of loading activities that could not be accommodated within the proposed loading supply, or within on-street loading zones, and would not create potentially hazardous loading conditions. (Less than significant)

The same number of loading spaces would be provided in both the Previous Project and Revised Project. As under the Previous Project, implementation of the truck management plan at the St. Luke’s Campus would restrict the length of incoming trucks and would specify that all truck maneuvering would be within the loading dock, without blocking the sidewalk or parking lanes on Cesar Chavez Street. Loading

demand would be accommodated with the proposed loading supply or within on-street loading zones and the impact would be less than significant.

Implementation of the Revised Project at the St. Luke's Campus would not result in a passenger loading/unloading demand that could not be accommodated within the proposed passenger loading/unloading zones, and would not create potentially hazardous conditions. (Less than significant)

The Final EIR concluded that the Previous Project at the St. Luke's Campus would result in a less-than-significant impact related to passenger loading/unloading demand, because peak passenger loading/unloading activities could be accommodated at the campus.

Passenger loading/unloading demand under the Revised Project would be greater than that of the Previous Project. As under the Previous Project, 350 feet of curbside passenger loading/unloading zones would be provided along Cesar Chavez Street, Valencia Street, and at San Jose Avenue. The Revised Project would have a demand for approximately 306 linear feet of passenger loading space; therefore, passenger loading/unloading would be accommodated within the zones on campus. Loading and passenger loading/unloading impacts at the St. Luke's Campus under the Revised Project would be less than significant. As under the Previous Project, no mitigation measures are required at the St. Luke's Campus under the Revised Project.

3.6.2.6 EMERGENCY VEHICLE ACCESS IMPACTS OF THE REVISED PROJECT AT THE ST. LUKE'S CAMPUS

Implementation of the Revised Project at the St. Luke's Campus would not result in a significant emergency vehicle impact. (Less than significant)

Under the Revised Project, the St. Luke's Emergency Department and ambulance bay would be in the same location as under the Previous Project. Emergency vehicle access would be the same as under the Previous Project. Therefore, emergency-access impacts would be less than significant. As under the Previous Project, no mitigation measures are required at the St. Luke's Campus under the Revised Project.

3.6.2.7 CONSTRUCTION IMPACTS OF THE REVISED PROJECT AT THE ST. LUKE'S CAMPUS

Implementation of construction-related activities under the Revised Project at the St. Luke's Campus would not cause a significant impact because of their temporary and limited duration. (Less than significant)

Construction activities associated with the Revised Project at the St. Luke's Campus would be greater than those associated with the Previous Project, but less than under Alternative 3A. Because of the larger hospital under the Revised Project, construction would take place at the St. Luke's Campus for a somewhat longer period of time than under the Previous Project (but a shorter period of time than Alternative 3A), because of the additional construction related to the additional excavation, additional building square footage and two additional floors at the St. Luke's Campus Hospital under the Revised Project as compared to the Previous Project. Construction at the St. Luke's Campus under the Revised Project would not substantially affect traffic, transit, pedestrian, and bicycle circulation; because of their temporary nature and limited duration, any potential impacts that would occur would not be considered significant. As under the Previous Project and Alternative 3A, construction impacts would be less than significant, but greater than under the Previous Project (and less than under Alternative 3A). As under the Previous Project and Alternative 3A, no mitigation measures are required at the St. Luke's Campus under the Revised Project.

3.6.2.8 PARKING DISCUSSION FOR REVISED PROJECT AT THE ST. LUKE'S CAMPUS

As under the Previous Project, a total of 450 parking spaces would be provided at the St. Luke's Campus under the Revised Project. As under the Previous Project, the Revised Project would require an exception to the Planning Code requirements for the minimum number of parking spaces as part of the PUD approval. In addition, similar to under the Previous Project, there would be a shortfall of parking supply compared to parking demand. These shortfalls would be somewhat greater under the Revised Project than under the Previous Project due to the increased size of the St. Luke's Campus Hospital. As under the Previous Project, it is anticipated that short-term visitors to the campus unable to find parking would likely park in any available on-street parking space around the campus, although some visitors may also choose to take transit, bicycle, or walk instead of driving. Employees unable to park at the campus could take transit, bicycle, walk, or park in one of CPMC's off-site parking facilities. Employees who choose to park in off-site facilities could utilize CPMC's shuttle services. As discussed and set forth in the Final EIR, CPMC's proposed enhanced TDM program would expand CPMC's current TDM program in order to further discourage the use of private automobiles. As explained on page C&R 3.9-33 of the Final EIR, the proposed additions to the current TDM program included in the enhanced program would result in approximately 15-20 percent reductions of both vehicle trips and parking demand as compared to the projected trip and parking generation calculated in the Final EIR.

In San Francisco, parking supply is not considered a permanent physical condition, and changes in the parking supply are not considered to be a significant impact under CEQA, but rather a social effect. However, to the extent that a parking shortfall could be considered a potential impact under CEQA, this impact would be considered to be less than significant because parking supply requirements implement City policies intended to reduce citywide traffic congestion and air quality effects by reducing the number of persons using single-occupancy vehicles, such as the City's "Transit First" policy. In addition, any impact would be considered less than significant because of the availability of alternative transportation modes at the St. Luke's Campus, incentives provided by CPMC's enhanced TDM program to utilize such alternative transportation modes, the ability of short-term visitors to the campus to utilize available on-street parking spaces around the campus, as described on pages 4.5-51 to 4.5-52 of the Draft EIR, and the ability of employees to park in CPMC's off-site facilities and use CPMC's shuttle services.

3.6.2.9 SUMMARY OF TRANSPORTATION IMPACTS AT THE ST. LUKE'S CAMPUS

The Final EIR concluded that the proposed development at St. Luke's Campus under the Previous Project and under Alternative 3A would result in less than significant project-level and cumulative impacts related to transportation. Due to the increased size of and number of beds in the St. Luke's Campus Hospital under the Revised Project, there would be an increase in vehicle, transit, bicycle, and pedestrian trips, as compared to the Previous Project. However, vehicular, transit, bicycle and pedestrian access and circulation patterns would remain the same as under the Previous Project. Transportation and circulation impacts under the Revised Project at the St. Luke's Campus would increase in comparison to the Previous Project, but not to the same extent as the increase under Alternative 3A, under which more development would occur at the St. Luke's Campus than under the Revised Project. Therefore, impacts under the Revised Project would fall between the range of impacts previously analyzed in the EIR under the Previous Project and Alternative 3A. None of the significance conclusions in the Final EIR regarding transportation impacts of the Previous Project would change, although impacts would be increased to a degree, and all improvement measures identified in the Final EIR as applicable to the Previous Project would continue to apply under the Revised Project. Project-level and cumulative impacts of the Revised Project on transportation would be less than significant, but greater than under the Previous Project (but less than under Alternative 3A). As under the Previous Project and Alternative 3A, no mitigation measures are required under this Revised Project.

3.6.3 NOISE

3.6.3.1 CATHEDRAL HILL CAMPUS

The noise analysis completed for the Previous Project and for the analysis of Alternative 3A in the Final EIR would be approximately the same for the Revised Project. The primary change made relative to the Previous Project at the proposed Cathedral Hill Campus would be the elimination of three floors from the Cathedral Hill Campus Hospital.

Short-term noise generated by construction and/or demolition activities related to the Revised Project at the Cathedral Hill Campus could temporarily expose existing nearby sensitive receptors to substantial increases in ambient noise levels. (Less than significant with mitigation)

The Final EIR stated that under the Previous Project, construction activities at the proposed Cathedral Hill Campus would not comply with the standards of the San Francisco Noise Control Ordinance. The Final EIR concluded that this impact would be less than significant, however, with implementation of Mitigation Measures M-NO-N1a through M-NO-N1c, which would minimize noise impacts by implementing measures in accordance with the San Francisco Noise Control Ordinance (M-NO-N1a), respond to community noise complaints via a community noise liaison (M-NO-N1b), and implement a construction noise management plan (M-NO-N1c). Construction noise impacts would be similar to the Previous Project under the Revised Project, but the construction period would be somewhat shorter, similar to Alternative 3A. Similar to the Previous Project, implementation of Mitigation Measures M-NO-N1a through M-NO-N1c would reduce construction noise impacts to a less-than-significant level under the Revised Project.

Operation of the Revised Project at the Cathedral Hill Campus would not cause a substantial permanent increase in traffic noise levels at noise-sensitive residential receptors and/or expose noise-sensitive receptors to a substantial increase in noise levels. (Less than significant)

The Final EIR concluded that development of the proposed Cathedral Hill Campus under the Previous Project would not result in a noticeable increase in ambient traffic noise along Cedar Street (noise-sensitive residential receptors), and, therefore, this impact would be less than significant. The Revised Project would, like Alternative 3A, generate less traffic than the Previous Project in the vicinity of the proposed Cathedral Hill Campus, but would still result in an increase in traffic volumes compared to the existing condition. Like the Previous Project and Alternative 3A, however, traffic noise level increases due to operation of the Cathedral Hill Campus under the Revised Project would not result in a noticeable increase in ambient traffic noise (3 decibels [dB] or greater) along the roadways on or near the Campus. Therefore, this impact would be less than significant under the Revised Project, and less than under the Previous Project.

Operation of stationary noise sources associated with the Revised Project at the Cathedral Hill Campus could expose on-site and off-site noise-sensitive receptors to noise levels that would exceed applicable standards, and/or result in a substantial increase in ambient noise levels. (Less than significant with mitigation)

The Final EIR stated that under the Previous Project, noise levels attributable to the proposed Cathedral Hill Campus Hospital's Level 5 kitchen exhaust fans, to Aduomed operations, and to oxygen truck deliveries would exceed the City's noise standards and result in a substantial increase in ambient noise levels. However, the Draft EIR concluded that Mitigation Measures M-NO-N3a through M-NO-N3e would reduce this impact to a less-than-significant level. As under the Previous Project, stationary noise sources would be introduced due to operation of the proposed Cathedral Hill Campus under the Revised

Project. Noise from these sources under the Revised Project would be similar to Alternative 3A, but less than under the Previous Project due to the reduced size of the hospital. The Revised Project's proposed Cathedral Hill Campus Hospital operations could generate a significant increase in noise levels relative to the ambient; however, this increase is likely to be less than for the Previous Project due to the reduced size of the hospital. This impact is considered significant. However, as under the Previous Project and Alternative 3A, Mitigation Measures M-NO-N3a through M-NO-N3e, which would monitor the sound levels of operating exterior equipment and require replacement or redesign if sound-level standards are not met (M-NO-N3a), require closure of bay doors during Aduomed operations, if feasible (M-NO-N3b), require application of noise-absorptive material to the loading dock area's ceiling structure if closure of bay doors is not feasible (M-NO-N3c), require noise attenuators on kitchen exhaust fans or require limits on the sound power levels of the fans (M-NO-N3d), and require that oxygen deliveries not be scheduled during typical church activity hours (M-NO-N3e), would reduce this impact to a less-than-significant level.

Future traffic-related interior noise levels could exceed applicable land use compatibility standards under the Revised Project at the Cathedral Hill Campus. (Less than significant with mitigation)

The Final EIR predicted that interior noise levels for sensitive receptors occupying habitable rooms at the proposed Cathedral Hill Campus MOB under the Previous Project would range from 32 dB to 48 dB day-night average noise level (L_{dn}) and, therefore, would exceed an interior noise level threshold of 45 dB L_{dn} . The Final EIR concluded that implementation of Mitigation Measure M-NO-N4 would reduce this impact under the Previous Project to a less-than-significant level. The habitable spaces of the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB under the Revised Project would be exposed to traffic noise from Geary Boulevard/Geary Street, Post Street, Franklin Street, and Cedar Street, but slightly less noise than under the Previous Project. Future traffic noise levels would still be expected to exceed the interior noise level limit for the Cathedral Hill Campus Hospital of 45 dB L_{dn} , resulting in a significant impact. As under the Previous Project, implementation of Mitigation Measure M-NO-N4, which would require that CPMC obtain the services of a qualified acoustical consultant to perform a detailed interior-noise analysis and develop noise-insulating features, and that interior spaces of the hospital be designed to include insulating features that would reduce the interior traffic noise levels to 45 dB L_{dn} or lower, would reduce this impact to a less-than-significant level. As under the Previous Project, interior noise levels at the Cathedral Hill Campus MOB would not exceed the interior noise limit of 45 dB L_{eq} applicable to the Cathedral Hill Campus MOB, and therefore, would result in a less-than-significant impact.

Groundborne vibration levels attributable to construction activities under the Revised Project at the Cathedral Hill Campus could exceed the threshold of significance for exposing noise- and vibration-sensitive land uses to vibration levels that exceed applicable thresholds. (Significant and unavoidable with mitigation)

The Final EIR determined that under the Previous Project, depending on the individual land use type, predicted levels of groundborne noise and vibration attributable to construction activities at the Cathedral Hill Campus may exceed the Federal Transit Administration's (FTA's) standard for human response at nearby off-site vibration-sensitive uses. The Final EIR concluded that this impact would remain significant and unavoidable even with implementation of Mitigation Measure M-NO-N5, which would require the implementation of operational (e.g., distance and daytime restrictions) impact reduction measures that are considered practical and feasible, and would require a construction vibration management plan that would require repair of vibration-damaged buildings to their pre-existing conditions. As under the Previous Project, demolition and construction activities may temporarily result in construction-generated vibration under the Revised Project. Demolition and excavation activities would

be the same as under the Previous Project, while the construction period for the upper hospital floors would be shorter, similar to Alternative 3A. The predicted levels of groundborne noise and vibration may exceed applicable thresholds, resulting in a significant impact, as under the Previous Project and Alternative 3A. As under the Previous Project and under Alternative 3A, this impact would remain significant and unavoidable even with implementation of Mitigation Measure M-NO-N5.

3.6.3.2 SUMMARY OF NOISE IMPACTS AT THE CATHEDRAL HILL CAMPUS

As under the Previous Project, implementation of Mitigation Measures M-NO-N1a through M-NO-N1c, M-NO-N3a through M-NO-N3e, M-NO-N4, and M-NO-N5 would be required for the Revised Project. Project-level and cumulative noise impacts under the Revised Project would be less than significant with mitigation, with the exception of the groundborne vibration impact associated with project demolition and construction, which would remain significant and unavoidable after implementation of mitigation. Impacts under this alternative would be slightly less than under the Previous Project because the development program at the Cathedral Hill Campus would be less intense under the Revised Project.

3.6.3.3 ST. LUKE'S CAMPUS

The noise analysis completed for the Previous Project in the Final EIR is applicable to the Revised Project. The principal change proposed to the St. Luke's Campus under the Revised Project would be the addition of additional building square footage and two additional floors to the St. Luke's Campus Hospital, resulting in increased construction duration, and somewhat higher operational noise levels due to the larger number of employees, patients, and visitors, and associated traffic.

Short-term noise generated by construction and/or demolition activities related to the Revised Project at the St. Luke's Campus would not temporarily expose existing nearby sensitive receptors to substantial increases in ambient noise levels. (Less than significant with mitigation)

The Final EIR explained that under the Previous Project, construction activities at the St. Luke's Campus would not comply with the standards of the San Francisco Noise Control Ordinance. The Final EIR concluded, however, that this impact from construction of the St. Luke's Campus Hospital and St. Luke's Campus MOB would be less than significant with implementation of Mitigation Measures M-NO-N1a through M-NO-N1c, which would minimize noise impacts by implementing measures in accordance with the San Francisco Noise Control Ordinance (M-NO-N1a), respond to community noise complaints via a community noise liaison (M-NO-N1b), and implement a construction noise management plan (M-NO-N1c). Development at the St. Luke's Campus under the Revised Project would be greater than analyzed in the EIR for the Previous Project, but less than under Alternative 3A. Construction activities would expose sensitive receptors to increased noise levels on the campus and in the existing residential neighborhood adjacent to the campus during the construction period. Construction activities at the St. Luke's Campus would occur over a slightly longer period of time under the Revised Project than under the Previous Project, but a shorter period than was analyzed for Alternative 3A. This impact is expected to be potentially significant, although similar to the Previous Project, and less than analyzed in the EIR for Alternative 3A. Implementation of Mitigation Measure M-NO-N1 would reduce this impact under the Revised Project to a less-than-significant level, as under the Previous Project and Alternative 3A. However, the impact would be slightly greater under the Revised Project than under the Previous Project because of the increased development program and construction activities at the Campus, but less than analyzed for Alternative 3A, which would include more construction activities and phases than the Revised Project.

Operation of the Revised Project at the St. Luke's Campus could cause a substantial permanent increase in traffic noise levels at noise-sensitive residential receptors and/or expose noise-sensitive receptors to a substantial increase in noise levels. (Less than significant)

The Final EIR concluded that, under the Previous Project, project-related traffic noise would not result in a noticeable increase in ambient traffic noise levels (3 dB or greater) and most likely would not be perceivable to existing noise-sensitive receptors. As a result, the Final EIR concluded that this impact would be less than significant under the Previous Project. The EIR also concluded that this impact would be less than significant under Alternative 3A. Operation of the St. Luke's Campus under the Revised Project would result in increased traffic in the project vicinity. This increase would be greater than under the Previous Project, but less than under Alternative 3A, which would generate more traffic than the Revised Project. As under both the Previous Project and Alternative 3A, traffic noise level increases related to the Revised Project are not expected to exceed the 3 dB threshold of significance, and are not expected to be noticed by existing noise-sensitive receptors in the project vicinity. Therefore, as under the Previous Project and Alternative 3A, this impact is less than significant under the Revised Project and no mitigation is required.

Operation of stationary noise sources associated with the Revised Project at the St. Luke's Campus could expose on-site and off-site noise-sensitive receptors to noise levels that would exceed applicable standards, and/or result in a substantial increase in ambient noise levels. (Less than significant with mitigation)

The Final EIR indicated that the operation of proposed stationary sources—specifically, rooftop heating, ventilation, and air conditioning (HVAC) equipment—at the St. Luke's Campus under the Previous Project could potentially generate noise levels that exceed the City's noise standards and result in a substantial increase in ambient noise levels. However, the Final EIR concluded that implementation of Mitigation Measure M-NO-N3, which would require the retention of a qualified acoustical consultant to measure the sound levels of operating exterior equipment within 30 days after installation and require replacement or redesign if sound-level standards are not met. This mitigation measure would reduce this impact to a less-than-significant level under the Previous Project. Stationary noise sources such as HVAC equipment, parking garage activities, patient drop-offs, loading dock and delivery activities, and waste disposal activities would be similar to the Previous Project, but at slightly elevated levels because of the increased number of patients, staff and visitors associated with the proposed larger St. Luke's Campus Hospital under the Revised Project. The level of activity, and associated noise, however, would be less than analyzed in the EIR for Alternative 3A. As under the Previous Project, operation of rooftop HVAC equipment could potentially generate noise levels that result in a substantial increase in ambient noise levels relative to existing conditions. This increase would be similar to under the Previous Project and would be less than Alternative 3A, because the amount of development would be less than under Alternative 3A. As under the Previous Project and Alternative 3A, this impact would be considered significant, absent mitigation. As under the Previous Project and Alternative 3A, implementation of Mitigation Measure M-NO-N3 at the St. Luke's Campus under the Revised Project would reduce this impact to a less-than-significant level.

Future traffic-related interior noise levels could exceed applicable land use compatibility standards under the Revised Project at the St. Luke's Campus. (Less than significant with Mitigation)

The Final EIR concluded that interior noise levels at sensitive receptors occupying office clinic, or habitable rooms in the proposed St. Luke's Campus Hospital and St. Luke's Campus MOB under the Previous Project would not exceed 45 dB L_{dn} and, therefore, this impact would be less than significant. As under the Previous Project, the office space and habitable spaces within the St. Luke's Campus Hospital

under the Revised Project would be exposed to traffic noise from Valencia Street and Cesar Chavez Street. However, the EIR determined that under Alternative 3A, which would generate more traffic than both the Previous Project and the Revised Project, future traffic noise levels at the hospital could exceed 45 dB L_{dn}, resulting in a potentially significant impact. The EIR determined that implementation of Mitigation Measure M-NO-N4, which would require that CPMC obtain the services of a qualified acoustical consultant to perform a detailed interior-noise analysis and develop noise-insulating features, and that interior spaces of the hospital be designed to include insulating features that would reduce the interior traffic noise levels to 45 dB L_{dn} or lower, would reduce this impact under Alternative 3A to a less-than-significant level. Traffic noise levels at the St. Luke's Campus Hospital under the Revised Project would be somewhat greater than under the Previous Project and, therefore, as under Alternative 3A, potentially could result in interior noise levels within the St. Luke's Campus Hospital that exceed 45 dB L_{dn}. Therefore, this impact could be significant without mitigation under the Revised Project. However, implementation of Mitigation Measure M-NO-N4 for the proposed development at St. Luke's Campus under the Revised Project would reduce the impact to a less-than-significant level, as under Alternative 3A. This is unlike under the Previous Project, where Mitigation Measure M-NO-N4 was not required for the St. Luke's Campus development.

Groundborne vibration levels attributable to construction activities under the Revised Project at the St. Luke's Campus could exceed the threshold of significance for exposing noise- and vibration-sensitive land uses to vibration levels that exceed applicable thresholds. (Significant and unavoidable with mitigation)

The Final EIR concluded that, depending on the individual land use type, predicted levels of groundborne noise and vibration attributable to construction activities at the St. Luke's Campus under the Previous Project may exceed FTA's standard for human response at nearby off-site vibration-sensitive uses, and this impact would remain significant and unavoidable even with implementation of Mitigation Measure M-NO-N5, which would require the implementation of operational (e.g., distance and daytime restrictions) impact reduction measures that are considered practical and feasible, and would require a construction vibration management plan that could require repair of vibration-damaged buildings to their pre-existing conditions. Construction and demolition activities at the St. Luke's Campus under the Revised Project could temporarily result in construction-generated vibration that could exceed applicable thresholds of significance, similar to the Previous Project, but for a somewhat longer duration because of the increased development and construction activities at this campus. However, the duration would be less than under Alternative 3A, which would involve a substantially longer construction period. As under the Previous Project and Alternative 3A, this impact would remain significant and unavoidable after implementation of Mitigation Measure M-NO-N5. As under the Previous Project and Alternative 3A, this impact would be significant and unavoidable even with mitigation incorporated at the St. Luke's Campus under the Revised Project. This impact would be greater under the Revised Project than under the Previous Project, but less than under Alternative 3A.

3.6.3.4 SUMMARY OF NOISE IMPACTS AT THE ST. LUKE'S CAMUS

As under the Previous Project, implementation of Mitigation Measures M-NO-N1, M-NO-N3a, M-NO-N3, and M-NO-N5 at the St. Luke's Campus would be required under the Revised Project. In addition, implementation of Mitigation Measure M-NO-N4 would be required for the proposed development at St. Luke's Campus under the Revised Project, as under Alternative 3A. This is unlike under the Previous Project, where Mitigation Measure M-NO-N4 was not required for the St. Luke's Campus development. As under the Previous Project and Alternative 3A, potential project-level and cumulative noise impacts of the Revised Project at St. Luke's would be less than significant with mitigation incorporated, with the exception of the groundborne vibration impact associated with project demolition and construction, which would remain significant and unavoidable after implementation of mitigation. However, these impacts would be slightly greater than under the Previous Project because the development program under the

Revised Project would be greater at the St. Luke's Campus, but would be less than the impacts analyzed for Alternative 3A.

3.7 AIR QUALITY

3.7.1 CATHEDRAL HILL CAMPUS

The air quality analysis completed for the Previous Project and for the analysis of Alternative 3A in the EIR would be approximately the same for the Revised Project. The only change made from the Previous Project at the proposed Cathedral Hill Campus would be the elimination of three floors at the Cathedral Hill Campus Hospital, similar to the reduction of floors proposed for Alternative 3A (a reduction of six floors under Alternative 3A versus three floors under the Revised Project).

3.7.1.1 IMPACTS UNDER THE APPLICABLE (1999) BAAQMD CEQA THRESHOLDS

Regional Impacts from Construction

Construction activities associated with the Revised Project would not result in short-term increases in fugitive dust that exceed BAAQMD CEQA significance criteria. (Less than significant with mitigation)

The Final EIR concluded that construction activities associated with the proposed Cathedral Hill Campus under the Previous Project would not result in short-term increases in fugitive dust that exceed the Bay Area Air Quality Management District's (BAAQMD's) CEQA significance criteria with implementation of Mitigation Measure M-AQ-1. The total area of new construction for the Revised Project would be similar to that for the Previous Project and Alternative 3A. As a result, construction-related emissions of fugitive dust would be similar to emissions under the Previous Project and Alternative 3A. As the EIR concluded with respect to both the Previous Project and Alternative 3A, implementing BAAQMD's basic and optional control measures and equipment exhaust control measures during construction of the Revised Project (pursuant to Mitigation Measure M-AQ-1) would reduce construction impacts from fugitive dust to a less-than-significant level. Because regional impacts are based on the total emissions from all campuses, this impact conclusion applies to the CPMC campuses in the aggregate under the Revised Project, and not only specifically to the proposed Cathedral Hill Campus.

Localized Impacts from Construction

Construction activities associated with the Revised Project at the Cathedral Hill Campus would expose sensitive receptors to substantial concentrations of toxic air contaminants. (Less than significant with mitigation)

The EIR concluded that the impact of health risks from emissions of diesel particulate matter during construction at the proposed Cathedral Hill Campus would be significant and unavoidable under the Previous Project. However, the C&R document revised this conclusion, based upon refined estimates of construction emissions from the Previous Project included in Appendix C to the C&R document, and revised the text in the Final EIR to conclude that this impact would be less than significant with mitigation under the Previous Project. (See C&R document at pp. C&R 4-84 to C&R 4-86.) The Draft EIR also concluded that this impact would be somewhat less at the proposed Cathedral Hill Campus under Alternative 3A, but still above the risk thresholds. However, because the C&R document concluded that impacts under the Previous Project would be less than significant with mitigation under the Previous Project, such impacts at the proposed Cathedral Hill Campus would also be less than significant with

mitigation under Alternative 3A, which would include less construction at the proposed Cathedral Hill Campus than under the Previous Project.

The amount of construction at the proposed Cathedral Hill Campus under the Revised Project would be somewhat less than under the Previous Project, but somewhat more than under Alternative 3A. Therefore, this impact would be somewhat less than under the Previous Project, but more than under Alternative 3A. Similar to both the Previous Project and Alternative 3A, this impact would be less than significant with mitigation under the Revised Project.

Implementation of Mitigation Measure M-AQ-N2, which requires installation of accelerated emission control devices on construction equipment, is required under the Revised Project and, similar to the Previous Project; its implementation would reduce impacts to a less-than-significant level with mitigation. Therefore, as under the Previous Project and Alternative 3A, construction at the proposed Cathedral Hill Campus under the Revised Project, with the implementation of Mitigation Measure M-AQ-N2, would result in a less-than-significant impact with respect to health risks from construction toxic air contaminants (TACs).

Regional Impacts from Operations

Operation of the Revised Project would exceed BAAQMD CEQA thresholds for mass emissions of criteria pollutants and would contribute to an existing or projected air quality violation at full buildout. (Significant and unavoidable)

The overall development program at the CPMC campuses under the Revised Project would be similar to, and somewhat reduced in comparison to, both the Previous Project and Alternative 3A. The Previous Project and Alternative 3A both would exceed the applicable criteria pollutant threshold for particulate matter with an aerodynamic resistance diameter of 10 micrometers or less (i.e., PM₁₀). No feasible mitigation is available to reduce this impact to a less-than-significant level. As a result, the Final EIR concluded that the Previous Project and Alternative 3A would have a significant and unavoidable impact with respect to operational criteria pollutant emissions. Emissions levels from stationary sources under the Revised Project would be generally consistent with those analyzed in the supplemental analysis of the Previous Project included as Appendix C to the C&R document. Therefore, under the Revised Project, regional impacts from operations would also be significant and unavoidable, and similar to the Previous Project and Alternative 3A. Because regional impacts are based on the total emissions from all campuses, this impact would result from the aggregate development at all of the CPMC campuses under the Revised Project.

Localized Impacts from Operations

Operation of the Revised Project at the Cathedral Hill Campus would not cause local concentrations of CO from motor vehicle exhaust to exceed state and federal ambient air quality standards, expose sensitive receptors to substantial concentrations of toxic air contaminants, or expose a substantial number of people to objectionable odors. (Less than significant)

The Final EIR concluded that operation of the proposed development at the Cathedral Hill Campus under the Previous Project or Alternative 3A would result in less-than-significant impacts related to local concentrations of carbon monoxide (CO) from motor vehicle exhaust, exposure of sensitive receptors to substantial concentrations of TACs, or exposure of a substantial number of people to objectionable odors. As a result, the Final EIR concluded that this impact would be less than significant under the Previous Project or Alternative 3A. The proposed Cathedral Hill Campus would be smaller under the Revised Project than under the Previous Project, but larger than under Alternative 3A. The Revised Project would

result in lower emissions, and the same less-than-significant conclusions reached in the Final EIR for the proposed Cathedral Hill Campus under the Previous Project and Alternative 3A would apply under the Revised Project. Therefore, as under the Previous Project and Alternative 3A, operations at the proposed Cathedral Hill Campus under the Revised Project would result in a less-than-significant impact with respect to local CO emissions from mobile sources, odors, and single-source and cumulative health risk from operational TACs. As under the Previous Project and Alternative 3A, no mitigation measures are required for the Revised Project.

3.7.1.2 IMPACTS UNDER THE 2010 BAAQMD CEQA THRESHOLDS

The analysis of air quality impacts in the EIR used thresholds of significance and methodologies from both the applicable 1999 BAAQMD CEQA Air Quality Guidelines and the updated 2010 BAAQMD CEQA Air Quality Guidelines to evaluate the potential air quality impacts of the Previous Project and the project alternatives. Although BAAQMD's adoption of the significance thresholds set forth in the 2010 Guidelines are the subject of judicial actions, the Planning Department has determined that Appendix D of the BAAQMD CEQA Air Quality Guidelines, in combination with BAAQMD's Revised Draft Options and Justification Report, provide substantial evidence to support the thresholds of significance recommended in the 2010 BAAQMD Guidelines. Therefore, the Planning Department has determined that these thresholds are appropriate for use in the analysis of the impacts of the Revised Project.¹²

Regional Impacts from Construction

Construction activities associated with the Revised Project would not result in short-term increase in fugitive dust that exceed the 2010 BAAQMD CEQA thresholds. (Less than significant with mitigation)

Please see the above discussion of regional impacts from construction-related fugitive dust under "Impacts Under the Applicable (1999) BAAQMD CEQA Thresholds." For the same reasons discussed therein, and as under the Previous Project, with implementation of Mitigation Measures M-AQ-N8a and M-AQ-N8b, this impact would be reduced to a less than significant level under the Revised Project.

Construction activities associated with the Revised Project would exceed 2010 BAAQMD CEQA thresholds for mass criteria pollutant emissions and would contribute to an existing or project air quality violation. (Significant and unavoidable with mitigation)

The EIR predicted that emissions of criteria pollutants from construction equipment sources at the Cathedral Hill Campus would remain above the 2010 BAAQMD CEQA thresholds of significance under both the Previous Project and Alternative 3A, even with the implementation of Mitigation Measure M-AQ-N9. Similarly, and because the Revised Project would not be substantially smaller than Alternative 3A, from a total construction perspective, under the Revised Project, the impact associated with criteria pollutant emissions during construction would be significant and unavoidable, even with the implementation of Mitigation Measure M-AQ-N9. Because regional impacts are based on the total emissions from all campuses, this impact would result from the aggregate development at all of the CPMC campuses under the Revised Project.

¹² Bay Area Air Quality Management District. Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance. October 2009.

Localized Impacts from Construction

Construction activities associated with the Revised Project at the Cathedral Hill Campus would result in short-term increases in emissions of diesel particulate matter that exceed the 2010 BAAQMD CEQA significance criteria and expose sensitive receptors to substantial concentrations of toxic air contaminants and PM_{2.5}. (Significant and unavoidable with mitigation)

Please see the above discussion of localized impacts from construction at the proposed Cathedral Hill Campus under "Impacts Under the Applicable (1999) BAAQMD CEQA Thresholds." Implementation of Mitigation Measure M-AQ-10a, which would require installation of accelerated emissions control devices on construction equipment, would be required under the Revised Project. As the EIR determined would be the case for both the Previous Project and Alternative 3A, this mitigation measure would not reduce this impact to a less-than-significant level under the Revised Project, because the Revised Project at the Cathedral Hill Campus would be smaller than the Previous Project, but larger than Alternative 3A. As under the Previous Project, construction at the proposed Cathedral Hill Campus under the Revised Project would, therefore, result in a significant and unavoidable impact with respect to health risks from construction TACs, although this impact would be somewhat reduced in comparison to the Previous Project.

Regional Impacts from Operations

Operation of the Revised Project would exceed the 2010 BAAQMD CEQA significance thresholds for mass criteria pollutant emissions and would contribute to an existing or projected air quality violation at full buildout. (Significant and unavoidable)

Please see the above discussion of regional impacts from operations at the proposed Cathedral Hill Campus under "Impacts Under the Applicable (1999) BAAQMD CEQA Thresholds." No feasible mitigation is available to reduce this impact to a less-than-significant level. Emissions levels from stationary sources under the Revised Project will be generally consistent with those analyzed in the supplemental analysis of the Previous Project included as Appendix C to the C&R document. Therefore, under the Revised Project, similar to under the Previous Project and Alternative 3A, regional impacts with respect to operational criteria pollutant emissions would be significant and unavoidable. Because regional impacts are based on the total emissions from all campuses, this impact would result from the aggregate development at all of the CPMC campuses under the Revised Project.

Localized Impacts from Operations

Operation of the Revised Project at the Cathedral Hill Campus would not expose sensitive receptors to substantial concentrations of toxic air contaminants or expose a substantial number of people to objectionable odors. (Less than significant)

Please see the above discussion of localized impacts from operations under "Impacts Under the Applicable (1999) BAAQMD CEQA Thresholds." As under the Previous Project and Alternative 3, operations at the proposed Cathedral Hill Campus under the Revised Project would result in less-than-significant impacts with respect to the 2010 BAAQMD CEQA thresholds of significance for odors and single-source and cumulative health risks from operational TACs. These impacts would be somewhat reduced under the Revised Project as compared to the Previous Project.

3.7.2 ST. LUKE'S CAMPUS

The air quality analysis completed for the Previous Project in the EIR would be approximately the same for the Revised Project. The principle change made to the St. Luke's Campus for the Revised Project, as compared to the Previous Project, would be the addition of two floors to the St. Luke's Campus Hospital. Therefore, localized construction-period air quality impacts would occur for a slightly longer period, and localized operational air quality impacts at the St. Luke's Campus would be slightly greater, due to the potential for additional or larger stationary sources of air pollutants at the St. Luke's Campus Hospital and the additional vehicle trips generated by additional employees, patients, and visitors at the St. Luke's Campus Hospital. Regional construction-period and operational impacts, however, would be slightly lower than under the Previous Project, because the increased emissions at the St. Luke's Campus would be more than offset by reductions at the proposed Cathedral Hill Campus.

Development at the St. Luke's Campus under the Revised Project would be greater than analyzed in the EIR for the Previous Project, but less than under Alternative 3A.

3.7.2.1 IMPACTS UNDER THE APPLICABLE (1999) BAAQMD CEQA THRESHOLDS

Regional Impacts from Construction

Regional impacts across all campuses under the Revised Project are described above in the discussion of "Regional Impacts from Construction" under "Impacts Under the Applicable (1999) BAAQMD Thresholds" for the proposed Cathedral Hill Campus. Construction-related emissions of fugitive dust would be similar to those under the Previous Project. Implementing Mitigation Measure M-AQ-1, which would require CPMC to implement BAAQMD's basic and optional control measures and equipment exhaust control measures during construction, would reduce regional construction impacts of the Revised Project to a less-than-significant level.

Localized Impacts from Construction

Construction activities associated with the Revised Project at the St. Luke's Campus would not expose sensitive receptors to substantial concentrations of toxic air contaminants. (Less than significant)

The total area of new construction at the St. Luke's Campus under the Revised Project would be somewhat increased as compared to the Previous Project, but less than under Alternative 3A, which would generate approximately 80 percent more TAC emissions than the Previous Project. The EIR concluded that although this impact would be greater under Alternative 3A than under the Previous Project, it would remain below the trigger threshold for risk under Alternative 3A. Since TAC emissions under the Revised Project would be lower than under Alternative 3A, emissions under the Revised Project would also remain below the trigger threshold for risk. Therefore, impacts at the St. Luke's Campus under the Revised Project would be less than significant with respect to health risks from construction TACs.

Regional Impacts from Operations

Regional impacts across all campuses under the Revised Project are described above in the discussion of "Regional Impacts from Operations" under "Impacts Under the Applicable (1999) BAAQMD Thresholds" for the proposed Cathedral Hill Campus. Under the Revised Project, regional impacts from operations would be similar to those under the Previous Project and Alternative 3A, which the Final EIR concluded would be significant and unavoidable. Therefore, under the Revised Project, regional impacts from operations would also be significant and unavoidable.

Local Impacts from Operations

Operation of the Revised Project at St. Luke's Campus would not cause local concentrations of CO from motor vehicle exhaust to exceed state and federal ambient air quality standards, expose sensitive receptors to substantial concentrations of toxic air contaminants, or expose a substantial number of people to objectionable odors. (Less than significant)

Under the Revised Project, the development program at the St. Luke's Campus would be somewhat more intense than under the Previous Project, although less intense than under Alternative 3A. The Revised Project would generate greater quantities of new operational emissions from mobile and stationary sources at the St. Luke's Campus than under the Previous Project, but less than under Alternative 3A. Therefore, the impacts of the Revised Project would also be greater than those of the Previous Project, but less than those of Alternative 3A.

The Final EIR analysis concluded that implementing either the Previous Project or Alternative 3A at the St. Luke's Campus would result in a less-than-significant impact with respect to single-source and cumulative health risk from operational TACs. Since the amount of stationary-source emissions at the St. Luke's Campus under the Revised Project would be within a range between the amounts under the Previous Project and Alternative 3A, and the Final EIR concluded that diesel particulate matter emissions would remain below the thresholds for risk under both the Previous Project and Alternative 3A, diesel particulate matter emissions also would remain below the thresholds of risk under the Revised Project. Therefore, this impact would be less than significant under the Revised Project, although greater than under the Previous Project and less than under Alternative 3A.

As discussed in the Final EIR, compliance with industry-standard waste disposal methods and BAAQMD Regulation 7 (Odorous Substances) would limit potential odor exposure. Therefore, the Revised Project would not expose a substantial number of people to objectionable odors, and impacts related to odor exposure would be less than significant under the Revised Project, as under the Previous Project and Alternative 3A.

3.7.2.2 IMPACTS UNDER THE 2010 BAAQMD CEQA THRESHOLDS

Regional Impacts from Construction

Regional impacts across all campuses under the Revised Project are described above in the discussion of "Regional Impacts from Construction" under "Impacts Under the 2010 BAAQMD CEQA Thresholds" for the proposed Cathedral Hill Campus. As under the Previous Project and Alternative 3A, implementing Mitigation Measure M-AQ-1 would reduce construction impacts from fugitive dust under the Revised Project to a less-than-significant level. Under the Revised Project, as under the Previous Project and Alternative 3A, the impact associated with emissions of criteria pollutants during construction would be significant and unavoidable even after implementation of Mitigation Measure M-AQ-N9, although it would be slightly reduced in comparison to the Previous Project and Alternative 3A.

Localized Impacts from Construction

Construction activities associated with the Revised Project at the St. Luke's Campus would result in short-term increases in emissions of diesel particulate matter that exceed the 2010 BAAQMD CEQA significance criteria and expose sensitive receptors to substantial concentrations of toxic air contaminants and PM_{2.5}. (Significant and unavoidable with mitigation)

The impact at the St. Luke's Campus under the Revised Project would be greater than the impact under the Previous Project, but less than the impact under Alternative 3A. As under the Previous Project and Alternative 3A, these impacts would be significant under the Revised Project pursuant to the 2010 BAAQMD threshold of significance, and would require Mitigation Measure M-AQ-10c to reduce diesel particulate matter emissions. This impact would be significant and unavoidable under the Revised Project despite mitigation, and would be greater than the impact under the Previous Project, which would also be significant and unavoidable, but less than the impact under Alternative 3A.

Regional Impacts from Operations

Regional impacts across all campuses under the Revised Project are described above in the discussion of "Regional Impacts from Operations" under "Impacts Under the 2010 BAAQMD CEQA Thresholds" for the proposed Cathedral Hill Campus. No feasible mitigation is available to reduce this impact to a less-than-significant level. Therefore, under the Revised Project, regional impacts with respect to operational emissions of criteria pollutants would be similar to under the Previous Project and Alternative 3A, and would be significant and unavoidable.

Localized Impacts from Operations

Operation of the Revised Project at the St. Luke's Campus would not expose sensitive receptors to substantial concentrations of toxic air contaminants or expose a substantial number of people to objectionable odors. (Less than significant)

Because greater quantities of new operational emissions would be generated by mobile and stationary sources at the St. Luke's Campus under the Revised Project than under the Previous Project, the impacts of the Revised Project would also be greater than under the Previous Project, although less than under Alternative 3A. The EIR concluded that the impacts of the Previous Project at the St. Luke's Campus with respect to single-source and cumulative health risk from operational TACs would be less than significant, and that an 80 percent increase in operational emissions under Alternative 3A would still keep diesel particulate matter emissions below the trigger thresholds for risk. Since the increase in operational emissions under the Revised Project as compared to the Previous Project would be less than the increase under Alternative 3A, diesel particulate matter emissions would remain below the trigger thresholds for risk. Therefore, the impacts of the Revised Project at the St. Luke's Campus with respect to the 2010 BAAQMD CEQA Guidelines thresholds of significance for single-source and cumulative health risks from operational TACs would be less than significant.

The Revised Project's compliance with industry-standard waste disposal methods and BAAQMD Regulation 7 (Odorous Substances) would limit potential odor exposure. Therefore, as under the Previous Project and Alternative 3A, implementation of the Revised Project would not expose a substantial number of people to objectionable odors. As a result, implementing the Revised Project at the St. Luke's Campus would result in a less-than-significant impact with respect to odors.

The impact of project-generated traffic particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less (PM_{2.5}) on ambient concentrations can be evaluated relative to the impact of existing roadway source impacts. Existing PM_{2.5} concentration levels associated with high-volume roadways in the vicinity of the proposed Cathedral Hill Campus were evaluated using the U.S. Environmental Protection Agency-approved model CAL3QHCR by the San Francisco Department of Public Health (SFDPH). As the EIR concluded with respect to the Previous Project and Alternative 3A, the increase in mobile-source emissions from local traffic at the St. Luke's Campus under the Revised Project is unlikely to exceed the value estimated at the proposed Cathedral Hill Campus (0.06 micrograms per cubic meter), which

experiences larger traffic quantities. Hence, as under the Previous Project and Alternative 3A, total operational PM_{2.5} emissions from the St. Luke's Campus under the Revised Project would be below the risk threshold, resulting in a less-than-significant impact. As under the Previous Project and Alternative 3A, no mitigation measures are required under the Revised Project.

3.8 GREENHOUSE GAS EMISSIONS

Because GHG emissions impacts are cumulative global impacts, rather than localized in nature, the EIR analyzed GHG emissions impacts of the Previous Project based upon the total aggregated emissions from all CPMC campuses, and the EIR did not include campus-specific analyses. Similarly, this Addendum analyzes GHG emissions impacts of the Revised Project based on the total emissions at all CPMC campuses.

The EIR determined that the net new construction area across all campuses under Alternative 3A would be virtually the same (a difference of less than 2 percent) as under the Previous Project. The overall development program at the CPMC campuses under the Revised Project would be similar to, and somewhat reduced in comparison to, both the Previous Project and Alternative 3A. The combined facility size of all CPMC campuses would be reduced from approximately 4,430,000 gsf under Alternative 3A and 4,306,000 gsf under the Previous Project to 4,207,000 gsf under the Revised Project. Therefore, construction-period GHG emissions and operational GHG emissions from stationary sources and vehicles at the proposed Cathedral Hill Campus under the Revised Project would be similar to, and somewhat less than, under the Previous Project and Alternative 3A. Construction-period GHG emissions and operational GHG emissions from stationary sources and vehicles would slightly increase at the St. Luke's Campus under the Revised Project as compared to the Previous Project, but would be lower than under Alternative 3A, because the development program at the St. Luke's Campus would be less intensive under the Revised Project than Alternative 3A. However, the increased emissions at the St. Luke's Campus under the Revised Project, as compared to the Previous Project, would be more than offset by reductions at the proposed Cathedral Hill Campus. Overall, the net new construction area under the Revised Project would be less than under both the Previous Project and Alternative 3A. Therefore, GHG emissions impacts under the Revised Project would be somewhat reduced in comparison to both the Previous Project and Alternative 3A.

3.8.1.1 IMPACT EVALUATIONS BASED ON THE STATE CEQA GUIDELINES

Direct and indirect GHG emissions generated under the Revised Project would not have a significant impact on the environment, nor would they conflict with an applicable plan, policy or regulation adopted for the purposes of reducing GHG emissions. (Less than significant)

Construction-Related Emissions

The Final EIR concluded that implementation of the Previous Project would not generate GHG emissions that would have a significant impact on the environment, and would not conflict with a plan, policy, or regulation developed for the purpose of reducing GHG emissions. Therefore, the Final EIR concluded that the impact of construction-related GHG emissions would be less than significant under the Previous Project. Under the Revised Project, as under the Previous Project or Alternative 3A, CPMC would be required to comply with applicable City regulations that reduce the project's construction-related contribution to GHG emissions. Therefore, implementing the Revised Project would not result in generation of construction-related GHG emissions that would have a significant impact on the environment, and the Revised Project would not conflict with a plan, policy, or regulation developed for the purpose of reducing GHG emissions.

Operational Emissions

Once construction is completed under the Revised Project, CPMC would be required to comply with San Francisco's GHG Reduction Strategy. As a result, operation of the Revised Project would not conflict with either the state or local GHG reduction strategy. In addition, the Revised Project would not conflict with any plans, policies, or regulations adopted for the purpose of reducing GHG emissions. The impact would be similar to impacts under the Previous Project and Alternative 3A. As under the Previous Project and Alternative 3A, this impact would be less than significant under the Revised Project, and no mitigation measures are required.

3.8.1.2 IMPACT EVALUATIONS BASED ON 2010 BAAQMD SIGNIFICANCE CRITERIA FOR GREENHOUSE GASES

Construction-Related Emissions

Construction-related GHG emissions under the Revised Project would not have a significant impact on the environment, nor conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. (Less than significant)

Construction-related GHG emissions under the Revised Project would be temporary and cease after buildout. In addition, CPMC would implement all BAAQMD-recommended best management practices (BMPs), would comply with the Dust and Demolition Debris Recovery Ordinance, and would implement Leadership in Energy and Environmental Design (LEED®) measures related to reducing construction-related GHG emissions. Therefore, construction-related GHG emissions would not be cumulatively considerable. The Revised Project would generate slightly reduced GHG emissions compared to the Previous Project or Alternative 3A. Therefore, the Revised Project would result in a less-than-significant impact, and impacts would be slightly less than under the Previous Project or Alternative 3A.

Operational Emissions

Direct and indirect operational GHG emissions under the Revised Project would have a significant impact on the environment or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. (Significant and unavoidable)

BAAQMD has identified three alternative thresholds for determining whether a project's GHG emissions are significant:

- 1) Compliance with a Qualified Greenhouse Gas Reduction Strategy; or
- 2) Whether a project's GHG emissions exceed 1,100 metric tons of carbon dioxide equivalents per year (MTCO₂e/yr); or
- 3) Whether a project's GHG emissions exceed 4.6 metric tons of carbon dioxide emissions per service population per year (MTCO₂e/SP/yr).

A lead agency may choose the threshold against which to analyze a project in order to determine the significance of a project's GHG emission impacts; however, BAAQMD encourages lead agencies to prepare a Qualified GHG Reduction Strategy and then to use Threshold #1, above, as the standard of significance for GHG emission impacts. Accordingly, on August 12, 2010, the San Francisco Planning Department submitted a draft of the *City and County of San Francisco's Strategies to Address*

Greenhouse Gas Emissions to BAAQMD. This document represents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's Qualified GHG Reduction Strategy. BAAQMD reviewed the document and concluded that it meets the criteria for a Qualified GHG Reduction Strategy as outlined in BAAQMD's 2010 CEQA Air Quality Guidelines. Therefore, projects that are determined to be consistent with San Francisco's Qualified GHG Reduction Strategy would result in a less-than-significant GHG emissions impact.

At the time the Draft EIR was prepared, the City and County of San Francisco had not yet obtained BAAQMD's approval of the Qualified GHG Reduction Strategy. Therefore, the EIR analysis of GHG emissions impacts used the numeric thresholds of significance (i.e., Thresholds # 2 and #3 above). However, because BAAQMD had approved San Francisco's Qualified GHG Reduction Strategy for San Francisco before the C&R Document was published, the Previous Project's compliance with the Qualified GHG Reduction Strategy under Threshold No. 1 above was analyzed in the C&R document. For those reasons, the following discussion analyzes GHG emissions under both of BAAQMD's numeric significance criteria, as well as under the qualitative significance threshold regarding compliance with a Qualified GHG Reduction Strategy.

The EIR analysis determined that under the Previous Project, the net operational GHG emissions across all campuses would be approximately 22,503 MTCO₂e/yr, which exceeds the GHG emissions significance threshold of 1,100 MTCO₂e/yr under the 2010 BAAQMD CEQA Guidelines. In addition, the EIR determined that the Previous Project would have a GHG-efficiency value of 5.9 MTCO₂e/SP/yr. Although the Previous Project would exceed the 2010 BAAQMD Guidelines' efficiency metric of 4.6 MTCO₂e/SP/yr, it is not clear that the BAAQMD efficiency metric appropriately applies to facilities such as hospitals and hotels, whose large numbers of visitors are not included in the service population (which includes employees and residents only).

The Final EIR concluded that because the total net new construction area would be less than 2 percent smaller under Alternative 3A than under the Previous Project, the net operational GHG emissions would likely also be approximately 2% lower. The total net new construction area also would be slightly smaller under the Revised Project than under the Previous Project or Alternative 3A. Therefore, the net operational GHG emissions would likely also be slightly lower. Despite the slight reduction, the Revised Project would exceed the 1,100 MTCO₂e/yr threshold, as would the Previous Project and Alternative 3A. In addition, based on the assumption that GHG emissions and working population are both proportional to development size, the efficiency metric under the Revised Project would be similar to the Previous Project's efficiency metric of 5.9 MTCO₂e/SP/yr and, therefore, would be greater than 4.6. The Revised Project would have lower GHG emissions and, therefore, a smaller impact, than the Previous Project. However, as under the Previous Project and Alternative 3A, the impact of the Revised Project would be significant and unavoidable with respect to GHG emissions, under the numeric significance criteria set forth in the 2010 BAAQMD CEQA Guidelines. As under the Previous Project and Alternative 3A, no feasible mitigation measures are available that would reduce impacts under the Revised Project to a less-than-significant level.

As explained above, because BAAQMD had not yet approved San Francisco's Qualified GHG Reduction Strategy at the time the Draft EIR was prepared, the Draft EIR compared the Previous Project and Alternative 3A against only the numeric criteria contained in the 2010 BAAQMD significance thresholds, and concluded there would be a significant and unavoidable GHG impact. This determination was made in part on the basis that, although CPMC had committed to incorporating numerous project design features intended to reduce operational GHG emissions, the resulting reduction could not be quantified.

The release of the Draft EIR was released for public review on July 21, 2010. Subsequently, on October 28, 2010, BAAQMD reviewed and concurred that the City and County of San Francisco's Strategies to

Address Greenhouse Gas Emissions¹³ meet BAAQMD's criteria for a Qualified GHG Reduction Strategy. Therefore, under the 2010 BAAQMD Guidelines, projects that are consistent with San Francisco's Qualified GHG Reduction Strategy would be considered to result in a less than significant GHG emissions impact. Such projects would be considered to have implemented all applicable, feasible mitigation measures.¹⁴ According to BAAQMD, "compliance with a Qualified Greenhouse Gas Reduction Strategy (or similar adopted policies, ordinances and programs), would provide the evidentiary basis for making CEQA findings that development consistent with the plan would result in feasible, measureable, and verifiable GHG reductions consistent with broad state goals such that projects approved under qualified Greenhouse Gas Reduction Strategies or equivalent demonstrations would achieve their fair share of GHG emission reductions."¹⁵

In order to facilitate determinations of project compliance with San Francisco's GHG Reduction Strategy, in November 2010 the San Francisco Planning Department released a Greenhouse Gas Analysis Compliance Checklist that is to be completed for each proposed project. A checklist breaking down the Previous Project's compliance was completed, and included in the C&R document as Appendix D. Based on this checklist, on December 14, 2010, the Environmental Planning Division determined that the Previous Project would be in compliance with the City's GHG Reduction Strategy. Because it was determined to be consistent with the BAAQMD-approved GHG Reduction Strategy, the Previous Project was shown to satisfy BAAQMD's mitigation guidance and to have identified all applicable, feasible mitigation measures.

With a determination of compliance with San Francisco's Qualified GHG Reduction Strategy, the Previous Project would comply with regulations or requirements adopted to implement both a regional and local plan for the reduction or mitigation of GHG Emissions. The Revised Project would incorporate all of the project design features and be subject to all of the requirements set forth in the Greenhouse Gas Analysis Compliance Checklist completed for the Previous Project. Therefore, similar to the Previous Project, the Revised Project would comply with San Francisco's BAAQMD-approved Qualified GHG Reduction Strategy. Therefore, similar to the Previous Project, the impact of the Revised Project on GHG emissions would support a finding of less than significant, and no further mitigation would be required.

As explained above, the 2010 BAAQMD Guidelines allow a determination of less than significant if a project is either below the quantitative threshold or consistent with a Qualified GHG Reduction Strategy. The Planning Department conservatively determined in the Final EIR that, because the Draft EIR analysis had concluded that the Previous Project would exceed the 2010 BAAQMD quantitative thresholds of significance, even though the Final EIR subsequently determined that the Previous Project would be consistent with the City's Qualified GHG Reduction Strategy, this impact would remain significant and unavoidable. The Revised Project would similarly exceed the 2010 BAAQMD quantitative thresholds.

Similarly, and for the same reasons, the Planning Department has conservatively determined that the Revised Project would result in a significant and unavoidable impact. As under the EIR's analysis of the Previous Project, this conservative conclusion is made despite the Planning Department's determination that both the Previous Project and the Revised Project would be consistent with the BAAQMD-approved Qualified GHG Reduction Strategy. The determination that this impact would be significant and unavoidable under the Revised Project is also made despite the fact that the Revised Project would result in a slightly reduced level of emissions relative to the Previous Project. As explained above, the Final EIR

¹³ San Francisco Planning Department. 2010. San Francisco's *Strategies to Address Greenhouse Gas Emissions*, November.

¹⁴ Bay Area Air Quality Management District. 2010 (May). *California Environmental Quality Act Draft Air Quality Guidelines*, p. 4-4.

¹⁵ Ibid., Appendix D: Threshold of Significance Justification, p. D-14.

concluded that no further mitigation would be required for the Previous Project because it would comply with the Qualified GHG Reduction Strategy. Similarly, because the Revised Project would be compliant with the BAAQMD-approved Qualified GHG Reduction Strategy, no further mitigation is required.

3.9 WIND AND SHADOW

3.9.1 CATHEDRAL HILL CAMPUS

The proposed Cathedral Hill Campus Hospital would be 12 floors and 226 feet tall under the Revised Project; by contrast, the hospital would be 265 feet tall under the Previous Project. The nine-floor, 130-foot tall Cathedral Hill Campus MOB would be the same as under the Previous Project. Wind and shadow impacts related to the Cathedral Hill Campus MOB would be identical to impacts of the Previous Project (see Section 4.9, “Wind and Shadow”), and therefore are not discussed further.

The Revised Project at the Cathedral Hill Campus would not alter wind in a manner that substantially affects public areas. (Less than significant)

The Final EIR concluded that implementing the Previous Project at the proposed Cathedral Hill Campus would not increase the total number of locations that would exceed the pedestrian-comfort criterion (11 miles per hour), and would not result in an exceedance of the wind-hazard criterion (26 miles per hour). Therefore, this impact would be less than significant under the Previous Project. Because of the reduced height of the Cathedral Hill Campus Hospital under the Revised Project, wind exceedances of the pedestrian-comfort criteria under the Revised Project would be the same or less than those identified for the Previous Project and the total number of locations exceeding the comfort criterion would not increase. Impacts related to wind would be less than significant, and less than under the Previous Project.¹⁶

The Revised Project at the Cathedral Hill Campus would not create net new shadow in a manner that would substantially affect the use of any park or open space under the jurisdiction of the San Francisco Recreation & Park Department, publicly accessible open space, outdoor recreation facility, or other public area or change the climate in either the community or the region. (Less than significant)

The Final EIR determined that no public outdoor recreational facilities or other publicly accessible open spaces and recreational spaces would be substantially affected by shadows from development at the proposed Cathedral Hill Campus under the Previous Project. Therefore, this impact would be less than significant under the Previous Project. Because the proposed Cathedral Hill Campus Hospital would be shorter under the Revised Project than under the Previous Project, as well as with the range of height and bulk as the existing on-site buildings (1255 Post Street Office Building and other nearby buildings), the proposed hospital would not result in net new shadows on sidewalks in the project vicinity under the Revised Project, as compared with the Previous Project. As under the Previous Project, shadows from the proposed hospital under the Revised Project would not reach any open spaces subject to Section 295 or other recreation spaces. Shadow impacts at the Cathedral Hill Campus under the Revised Project would be less than significant, and less than under the Previous Project.

3.9.1.1 SUMMARY OF WIND AND SHADOW IMPACTS AT THE CATHEDRAL HILL CAMPUS

As under the Previous Project, no mitigation measures would be required at the Cathedral Hill Campus under the Revised Project. Project-level and cumulative impacts on wind and shadow would be less than

¹⁶ Memo from Charles Bennett (ESA) to Steven Pepler (SmithGroup), Wind Effects of 2013 Design Changes to Hospital Building, Cathedral Hill Hospital Project, February 25, 2013.

significant under the Revised Project, and less than under the Previous Project, because of the reduced development at this campus.

3.9.1.2 ST. LUKE'S CAMPUS

Under both the Previous Project and the Revised Project, existing buildings would be demolished and new buildings constructed at the St. Luke's Campus. Under the Revised Project, the development program for the St. Luke's Campus would be greater than under the Previous Project, although the overall development program at the St. Luke's Campus would be less than previously analyzed for Alternative 3A. As under the Previous Project, the St. Luke's Campus Hospital would be constructed on the northwestern portion of the campus on the site of the existing 3615 Cesar Chavez Street surface parking lot; however, the St. Luke's Campus Hospital under the Revised Project would be 142 feet in height and two floors (43 feet) taller than the St. Luke's Campus Hospital under the Previous Project, which would be 99-feet-tall. No changes from what was analyzed in the Previous Project are proposed for the new St. Luke's Campus MOB, 1912 Building, Monteagle Medical Center, Duncan Street Parking Garage, or Hartzell Building under the Revised Project.

The Revised Project at the St. Luke's Campus would not alter wind in a manner that substantially affects public areas. (Less than significant)

Based on the exposure, massing, and orientation of the buildings proposed for the St. Luke's Campus under the Previous Project, the wind impact evaluation in the Final EIR determined that no substantial adverse changes to the wind environment would occur in pedestrian areas adjacent to or near the campus. Therefore, the Final EIR determined that this impact would be less than significant. The St. Luke's Campus is sheltered from northwesterly and westerly winds by existing upwind three- and four-floor structures. Additionally, the terrain in the immediate vicinity of the St. Luke's Campus slopes upward to the north and west of the campus, with Guerrero and Dolores Streets located upslope, which increases the sheltering effects of existing off-site upwind structures. Under the Revised Project, a larger St. Luke's Campus Hospital building than under the Previous Project—but within the same building footprint—would be constructed on the west side of the campus. While the additional two floors of the St. Luke's Campus Hospital would be exposed to winds, wind accelerations that would be generated by the tower portion of the building would be elevated above the ground by the presence of the upwind three-floor low-rise portion of the building. The 142-foot-tall St. Luke's Campus Hospital under the Revised Project would provide wind shelter to the proposed St. Luke's Campus MOB (similar to the Previous Project), reducing any wind impacts. Because of the existing upwind two- and three-floor up to 40-foot-tall residences on Cesar Chavez and Guerrero Streets, just the upper floors of the St. Luke's Campus Hospital would extend above these adjacent residences. The proposed St. Luke's Campus MOB would be 58 feet shorter (not including mechanical penthouse) than the existing hospital tower it would replace on the same site. No substantial changes to the wind environment in pedestrian areas adjacent to or near the St. Luke's Campus under the Revised Project would occur, and this impact would be less than significant.¹⁷

¹⁷ Memo from Don Ballanti to Cameron Mueller, Wind Impact Evaluation for the Updated CPMC Long Range Development Plan, St. Luke's Campus, San Francisco AECOM, February 18, 2013.

The Revised Project at the St. Luke's Campus would not create net new shadow in a manner that would substantially affect the use of any park or open space under the jurisdiction of the San Francisco Recreation & Park Department, publicly accessible open space, outdoor recreation facility, or other public area or change the climate in either the community or the region. (Less than significant)

The Final EIR determined that no outdoor recreational facilities or other public or publicly accessible open space or recreational space off campus would be substantially affected from the proposed development at the St. Luke's Campus under the Previous Project. Therefore, this impact would be less than significant under the Previous Project. Under the Revised Project, the St. Luke's Campus Hospital would be 43 feet taller than under the Previous Project, and 27 feet taller than under Alternative 3A. The St. Luke's Campus Hospital and St. Luke's Campus MOB would likely cast shadows on adjacent sidewalks at different times of day (10 a.m., 12 noon, and 3 p.m.) and different times of year (December 21, June 21, March 21, and September 21). These new buildings would add net new shadows in the vicinity of the campus; however, the new shadows would not affect open space protected by Section 295 or other recreational spaces. These net new shadows would fall on privately owned open space adjacent to campus to the west (for residential structures fronting San Jose Avenue, Guerrero Street, and Cesar Chavez Street) and onto the sidewalks of Valencia Street, Guerrero Street, Cesar Chavez Street, and San Jose Avenue. However, these net new shadows would not exceed levels that are normal and expected in highly urban areas. Therefore, the new buildings are not expected to create net new shadows in a manner that would substantially affect the use of any park or open space subject to Section 295, any publicly accessible private open space, any outdoor recreational facility, or any other public area, or that would change the climate in either the community or the region. Under the Revised Project this shadow impact at the St. Luke's Campus would be less than significant¹⁸, as under the Previous Project and Alternative 3A.

3.9.1.3 SUMMARY OF WIND AND SHADOW IMPACTS AT THE ST. LUKE'S CAMPUS

As under the Previous Project, no mitigation measures are required under the Revised Project. Project-level and cumulative impacts on wind and shadow would be less than significant under the Revised Project (as under to Alternative 3A), but greater than under the Previous Project because of the increased development at this campus.

¹⁸ San Francisco Planning Department, Shadow Fan re: St. Luke's Hospital: Max Height of 142'-0" (Mar. 1, 2013); email from Elizabeth Watty, San Francisco Planning Department. to Devyani Jain, San Francisco Planning Department re: CPMC (Mar. 01, 2013).

3.9.2 RECREATION

3.9.3 CATHEDRAL HILL CAMPUS

The Revised Project at the Cathedral Hill Campus would not 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, and would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered park or recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives. (Less than significant)

The Revised Project at the Cathedral Hill Campus would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. (Less than significant)

The Revised Project at the Cathedral Hill Campus would not adversely affect existing recreational opportunities. (Less than significant)

The Final EIR determined that implementing the Previous Project at the proposed Cathedral Hill Campus would intensify the activity and uses on campus and could generate more trips to local nearby parks than under current conditions. Although some of these people might visit recreational facilities in the campus vicinity, such usage was not expected to result in substantial physical deterioration of nearby facilities or facilities areawide. Therefore, the Final EIR concluded this impact would be less than significant under the Previous Project. The Revised Project would not change the analysis or conclusions in the discussion of recreational impacts in the Draft EIR, pages 4.10-34 to 4.10-54. The amount and types of open space would not change as a result of any of the revisions, nor would the demand for open space increase. The less-than-significant impacts identified in the Final EIR would also be less-than-significant under the Revised Project. No new significant impacts would result from implementing the Revised Project rather than the Previous Project at the proposed Cathedral Hill Campus.

The only change made from the Previous Project at the proposed Cathedral Hill Campus would be to eliminate floors and beds within the Cathedral Hill Campus Hospital, similar to the reduction of floors proposed for Alternative 3A (a reduction of six floors under Alternative 3A – three floors under the Revised Project). Accordingly, there would be a reduced development program under the Revised Project and thus, a reduced average daily population at the proposed Cathedral Hill Campus.

The Final EIR determined that, under the Previous Project, CPMC personnel, and to a lesser extent patients and visitors, might use surrounding parks and recreational facilities. However, the incremental increase in demand on nearby facilities associated with the proposed near-term projects under the Previous Project would not result in the need to expand existing recreational facilities or construct new facilities, or to cause the physical deterioration of nearby parks and open spaces. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. Similar to the Previous Project, CPMC personnel, visitors, and patients are not expected to substantially increase their use of nearby parks under the Revised Project, because their visits to the proposed Cathedral Hill Campus would be mainly focused on health care services. As under the Previous Project, any increase in use by patients and visitors would be incidental and result in incremental use of nearby recreational facilities and open space (see Draft EIR, page 4.10-35). The impact on recreational facilities in the campus vicinity would be less than significant, and less than under the Previous Project because of the reduced

development program under the Revised Project, and the resulting reduced average daily population at the proposed Cathedral Hill Campus.

3.9.4 ST. LUKE'S CAMPUS

The Revised Project at the St. Luke's Campus would not 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, and would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered park or recreational facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, or other performance objectives. (Less than significant)

The Revised Project at the St. Luke's Campus would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. (Less than significant)

The Revised Project at the St. Luke's Campus would not adversely affect existing recreational opportunities. (Less than significant)

The Final EIR determined that the use of nearby recreational spaces by CPMC personnel at the St. Luke's Campus under the Previous Project would be expected to be spread over different times of day, 7 days a week. Visitors and patients would not be expected to substantially increase their use of nearby parks, because their visits to the proposed St. Luke's Campus would be mainly focused on health care services. For these reasons, the Final EIR concluded that this impact would be less than significant under the Previous Project. The Revised Project would not change the analysis or conclusions in the discussion of recreational impacts in the Draft EIR, pages 4.10-34 to 4.10-54. The amount and types of open space would not change as a result of any of the revisions, nor would the demand for open space substantially increase. The less-than-significant impacts identified in the Final EIR would remain less than significant under the Revised Project. No new significant impacts would result from implementing the Revised Project rather than the Previous Project at the St. Luke's Campus.

The Final EIR determined that, under the Previous Project, CPMC personnel, and to a lesser extent patients and visitors, might use surrounding parks and recreational facilities. However, the incremental increase in demand on nearby facilities associated with the proposed near-term projects (hospital and MOB/Expansion Building at St. Luke's Campus) under the Previous Project would not result in the need to expand existing recreational facilities or construct new facilities, or to cause the physical deterioration of nearby parks and open spaces. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. The development program at the St. Luke's Campus under the Revised Project would be somewhat larger than under the Previous Project, but smaller than under Alternative 3A. It would result in a net increase of full-time equivalent (FTE) personnel from 2006 to 2030 as compared to existing conditions, as well as compared to the Previous Project. The Revised Project's increase in FTE personnel at the St. Luke's Campus could increase demand on local parks relative to the Previous Project, although demand would be less than under Alternative 3A. The Revised Project would result in net new residents in San Francisco; however, these residents would be dispersed throughout the City and would not place excessive demand on any specific neighborhood park. Impacts on recreational facilities would be less than significant, although greater than under the Previous Project (but less than under Alternative 3A). As under the Previous Project and Alternative 3A, the impact would be less than significant, and no mitigation measures would be required at the St. Luke's Campus under the Revised Project.

3.10 PUBLIC SERVICES

3.10.1 CATHEDRAL HILL CAMPUS

The Revised Project at the Cathedral Hill Campus would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire and emergency services facilities, schools, or libraries to maintain acceptable service ratios, response times, and/or other performance objectives. (Less than significant)

The Revised Project at the Cathedral Hill Campus would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. (Less than significant with mitigation)

Under both the Previous and Revised Project, existing buildings would be demolished and new buildings constructed at the proposed Cathedral Hill Campus. The reduced-size proposed Cathedral Hill Campus Hospital under the Revised Project, similar to Alternative 3A, would require less construction and would accommodate less employment than the hospital proposed under the Previous Project. The increase in employment at this campus, compared to existing conditions, would increase San Francisco's population, as a portion of net new CPMC workers would relocate to the city. Under both the Previous Project and Revised Project, CPMC would be required to comply with all applicable provisions of San Francisco's building and fire codes. Construction activities could result in increased demand for police services, if construction caused traffic conflicts requiring San Francisco Police Department (SFPD) response. However, as under the Previous Project, Mitigation Measure M-PS-N2 (see Draft EIR page 4.11-25) would require CPMC to implement a construction management traffic plan for the Revised Project. Implementing this mitigation measure under the Revised Project would reduce potential impacts on SFPD services to a less-than-significant level, and less than under the Previous Project.

Under the Revised Project, the number of FTE personnel at the proposed Cathedral Hill Campus would increase at this site over existing conditions and uses, but this increase would be less than under the Previous Project. As a result, the number of new residents dispersed throughout the city could increase compared to existing conditions, although not to the same extent as under the Previous Project. As under the Previous Project, this increase would not place undue demand on any one public service facility (see Draft EIR page 4.11-20).

The number of FTE personnel would increase at the proposed Cathedral Hill Campus under the Revised Project, but not to the same extent as under the Previous Project because of the reduced development. Therefore, as with the Previous Project, implementing the Revised Project at the proposed Cathedral Hill Campus would not result in a substantial adverse physical impact associated with the provision of, or the need for, new or physically altered fire and emergency service facilities, police facilities, schools, or libraries (see Draft EIR pages 4.11-17 to 4.11-35). Project-level and cumulative impacts on public services would be less than significant with mitigation incorporated under the Revised Project, and less than under the Previous Project because of the reduced development program at this campus.

3.10.2 ST. LUKE'S CAMPUS

The Revised Project at the St. Luke's Campus would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered fire and emergency services facilities, schools, or libraries to maintain acceptable service ratios, response times, and/or other performance objectives. (Less than significant)

The Revised Project at the St. Luke's Campus would not result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives. (Less than significant)

Under both the Previous and Revised Project, existing buildings would be demolished and new buildings constructed at the St. Luke's Campus. Under the Revised Project, similar to Alternative 3A, the development program for the St. Luke's Campus would be greater than under the Previous Project, although less than under Alternative 3A. The additional employees, patients and visitors at the campus would result in additional demand for public services at the St. Luke's Campus, compared to the Previous Project and existing conditions, but less than analyzed under Alternative 3A. Although greater, this demand would be accounted for within services to the area as is expected in dense urban areas. As under the Previous Project, the increase in personnel at this campus would cause San Francisco's population to increase, because a portion (49%) of new CPMC workers would be expected to relocate to the city (see Draft EIR page 4.11-20). As under the Previous Project, CPMC's Revised Project would be required to comply with all applicable provisions of San Francisco's building and fire codes.

The number of FTE personnel at the St. Luke's Campus would increase with implementation of the Revised Project. This increase would be greater than the increase under the Previous Project and less than under Alternative 3A. Because of the increased development under the Revised Project, FTE personnel at the St. Luke's Campus would be greater than under the Previous Project. The St. Luke's Campus would therefore have more FTE personnel under the Revised Project than under the Previous Project.

As a result, the number of new residents dispersed throughout San Francisco could increase. Implementing the Revised Project at the St. Luke's Campus would result in more housing and more residents than the Previous Project at St. Luke's, but fewer than under Alternative 3A. However, as under the Previous Project and Alternative 3A, this increase would not place undue demand on any one public service facility. The potential increase in demand for public services would also be offset by the decrease in employment at the proposed Cathedral Hill Campus under the Revised Project (see Draft EIR page 4.11-20). Therefore, implementing the Revised Project would not result in a substantial adverse physical impact associated with the provision of, or the need for, new or physically altered fire and emergency service facilities, police facilities, schools, or libraries. No mitigation measures are required at the St. Luke's Campus under the Revised Project. Project-level and cumulative impacts on public services would be less than significant, but greater than under the Previous Project because of the increased development program at this campus under the Revised Project (although less than under Alternative 3A).

3.11 UTILITIES AND SERVICE SYSTEMS

3.11.1 CATHEDRAL HILL AND ST. LUKE'S CAMPUSES

Similar to the analysis of the Previous Project, the analysis of the Revised Project considers the utilities and service systems demand based on the overall changes at all five CPMC campuses.

The Revised Project would not exceed wastewater treatment requirements of the applicable regional water quality control board. (Less than significant)

As under the Previous Project, CPMC's Revised Project would comply with City requirements by preparing a storm water pollution prevention plan (SWPPP) for each campus and incorporating construction BMPs. The changes in uses within the buildings at the CPMC campus sites would not substantially change the quality of wastewater discharged from the buildings. The proposed Cathedral Hill Campus would experience the biggest change in type of use, where a hotel would be replaced by a hospital, but the change would be less extensive under the Revised Project than under the Previous Project because of the reduced-size proposed Cathedral Hill Campus Hospital (similar to under Alternative 3A). This change would not adversely alter the quality of wastewater discharged from the CPMC campus sites such that the receiving wastewater treatment plant would be at risk of violating treatment requirements. The Revised Project would be similar to the Previous Project, as discussed under "Utilities and Services Systems" (see Draft EIR page 4.12-25), hazardous materials and wastes would be properly stored, used, and disposed of in accordance with current CPMC permits and regulated under the authority of the San Francisco Hazardous Materials Unified Program Agency (HMUPA). As a result, the Revised Project would not result in an exceedance of the San Francisco Bay RWQCB's wastewater treatment requirements. The impact under the Revised Project would be less than significant, as under the Previous Project.

The Revised Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than significant)

The Final EIR determined that the water demand associated with the Previous Project would not result in a requirement for major expansion of the water utility system, and implementation of the Previous Project would not require new water facilities or the expansion of existing facilities. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. Overall, water demand generated at the CPMC campuses under the Revised Project would be similar to the demand generated under the Previous Project (and similar to under Alternative 3A). Water demand at the Pacific and Davies Campuses would be the same as under the Previous Project since there would be no changes at either campus as part of the Revised Project. Since the scale of development at the St. Luke's Campus would increase, water demand at the St. Luke's Campus would be greater under the Revised Project than under the Previous Project. On the other hand, since the scale of development at the Cathedral Hill Campus would decrease, water demand at the Cathedral Hill Campus would be less under the Revised Project than under the Previous Project. CPMC would continue to comply with City regulations for stormwater management and incorporate LEED® design standards into new buildings under the Revised Project. Therefore, the overall water demand at CPMC campuses under the Revised Project would be similar to, although slightly less than, demand under the Previous Project. The Revised Project would not require new water facilities, expansion of existing facilities, or any new or expanded water entitlements. Therefore, similar to the Previous Project, impacts on water facilities would be less than significant under the Revised Project (see Draft EIR page 4.12-29).

The Revised Project would not require or result in the construction of new wastewater treatment or stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. (Less than significant)

The Final EIR concluded that the Previous Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities and, therefore, this impact would be less than significant. The CPMC campuses are within the City's combined sewer system and are served by existing wastewater and stormwater lines. As under the Previous Project, stormwater discharges from these sites under the Revised Project would decrease relative to existing conditions; CPMC would comply with City regulations that would reduce stormwater discharges from the campus sites by 25 percent by implementing Low Impact Development (LID) measures or green building features (see Draft EIR page 4.12-32). The Revised Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Therefore, as under the Previous Project, impacts on wastewater and stormwater treatment facilities under the Revised Project would be less than significant.

SFPUC would have sufficient water supplies to serve the Revised Project from existing entitlements and resources. No new or expanded entitlements would be needed. (Less than significant)

The Final EIR determined that (1) the San Francisco Public Utilities Commission (SFPUC) had included the water demands associated with the Previous Project in San Francisco's future water demands, (2) the Previous Project would not result in major expansion of the water utility system, and (3) SFPUC would not require any new or expanded entitlements to provide water to the CPMC campuses under the Previous Project. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. As under the Previous Project and Alternative 3A, SFPUC would have sufficient water supplies to serve the Revised Project from existing entitlements and resources, and this impact would be less than significant.

The Revised Project would be served by a landfill with sufficient permitted capacity to accommodate its solid waste disposal needs. (Less than significant)

The Final EIR concluded that under the Previous Project, CPMC would comply with City recycling requirements and green building policies, as applicable; therefore, this impact would be less than significant. Solid waste would be generated during demolition of existing buildings under the Revised Project, resulting in a short term increase in solid waste. However, as with the Previous Project, compliance with the City's Construction and Demolition (C&D) Ordinance (No. 27-06) would result in a diversion rate of approximately 65 percent; in addition, compliance with other City required regulations would reduce the amount of solid waste generated at this site and ultimately disposed of at area landfills. Because CPMC would implement recycling efforts and comply with City recycling requirements, this impact would be less than significant and similar to that under the Previous Project during construction and operation. As with the Previous Project, CPMC would comply with federal, state, and local statutes and regulations related to solid waste under the Revised Project.

3.11.1.1 SUMMARY OF UTILITY AND SERVICE SYSTEM IMPACTS UNDER THE REVISED PROJECT

As under the Previous Project (and similar to Alternative 3A), no mitigation measures would be required at the proposed Cathedral Hill and St. Luke's Campuses under the Revised Project. Project-level and cumulative impacts on utilities and service systems would be less than significant, and similar to impacts of the Previous Project.

3.12 BIOLOGICAL RESOURCES

3.12.1 CATHEDRAL HILL CAMPUS

Tree and shrub removal and vegetation clearing required at the Cathedral Hill Campus during construction of the Revised Project may potentially disturb nesting birds and could result in the destruction of bird nests. (Less than significant with mitigation)

The Final EIR indicated that under the Previous Project, construction-related activity and construction equipment moving around the site could temporarily disturb roosting birds on the campus site and within the immediate vicinity. The Final EIR concluded that implementation of Mitigation Measure M-BI-N1 would reduce this impact to a less-than-significant level under the Previous Project. As under the Previous Project, all of the trees at the site of the proposed Cathedral Hill Campus Hospital currently occupied by the Cathedral Hill Hotel and 1255 Post Street Office Building, and at the site of the proposed Cathedral Hill Campus MOB (seven of which were identified as significant trees) would be removed during demolition under the Revised Project. Any birds nesting in trees on campus could be disturbed by demolition activities.

Demolition-related activity and construction equipment could result in a potentially significant impact on nesting birds. Mitigation Measure M-BI-N1 (see Draft EIR page 4.13-19 in Section 4.13, “Biological Resources”) would require preconstruction surveys during the nesting season (February through August) before demolition and construction activities. If active nests are located during such surveys, Mitigation Measure M-BI-N1 would require implementation of measures which may include prohibiting construction within buffer areas around active nests, modifying construction activities, and/or removing or relocating nests. As under the Previous Project (and Alternative 3A), implementation of this measure under the Revised Project would reduce this impact to a less-than-significant level.

The Revised Project at the Cathedral Hill Campus would require removal of protected trees during construction. (Less than significant)

The Final EIR determined that implementation of the Previous Project at the proposed Cathedral Hill Campus would comply with all of the City’s regulations related to tree protection and, therefore, this impact would be less than significant. Demolition and construction activities would require the removal of protected trees at the proposed Cathedral Hill Campus. As under the Previous Project, the excavation and construction of the Van Ness Avenue pedestrian tunnel would damage or require removal of a portion of the landscaping in the street median. However, CPMC would be required to submit a tree protection plan to the City and implement the plan for trees that could be affected by construction of the proposed Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB, and Van Ness Avenue pedestrian tunnel. As under the Previous Project, CPMC would obtain a permit for tree removal from the City and County of San Francisco Department of Public Works (DPW), consistent with Article 16, “Urban Forestry Ordinance,” of the San Francisco Public Works Code. In addition, pursuant to Section 143 of the San Francisco Planning Code, CPMC would have to ensure that an appropriate replacement tree for each street tree removed would be planted on the project site or along the street, or would have to pay an in-lieu fee. As under the Previous Project, implementation of the tree protection plan and compliance with applicable regulations would reduce impacts on street and significant trees at the proposed Cathedral Hill Campus site to a less-than significant level under the Revised Project.

3.12.1.1 SUMMARY OF BIOLOGICAL RESOURCES IMPACTS AT THE CATHEDRAL HILL CAMPUS

The Final EIR determined that, because the Cathedral Hill Campus is located in a dense, long-developed, urban area and does not contain any waters, wetland, riparian habitat, or other sensitive habitat; no significant cumulative impacts were anticipated under the Previous Project. Although the urban landscaping of the campus provides some habitat value for protected wildlife (primarily shelter for birds), urban landscape habitat of similar quality can be found throughout San Francisco. The Final EIR determined that with implementation of Mitigation Measure M-BI-N1, the Previous Project's contribution to the overall cumulative effect would be reduced. Therefore, the Final EIR concluded that cumulative impacts related to biological resources would be less than significant under the Previous Project. As under the Previous Project, implementation of Mitigation Measure M-BI-N1 would be required under the Revised Project. Project-level and cumulative impacts on biological resources at the proposed Cathedral Hill Campus would be less than significant under the Revised Project, and similar to those under the Previous Project.

3.12.2 ST. LUKE'S CAMPUS

Tree and shrub removal and vegetation clearing required at the St. Luke's Campus during construction of the Revised Project may potentially disturb nesting birds and could result in the destruction of bird nests. (Less than significant with mitigation)

The Final EIR indicated that construction-related activity and construction equipment moving around the St. Luke's Campus under the Previous Project could temporarily disturb roosting birds on the campus and within the immediate vicinity. The Final EIR concluded that implementation of Mitigation Measure M-BI-N1 would reduce this impact to a less-than-significant level under the Previous Project. As under the Previous Project, the demolition of the existing hospital tower under the Revised Project could affect eight trees adjacent to the structure, five of which have been identified as significant. The landmark fig tree present on campus, near the 1957 Building, is less than 50 feet from the existing hospital tower and could be affected by the hospital demolition if preventative measures are not taken. Therefore, as under the Previous Project, implementation of Improvement Measure I-BI-N2 (see Draft EIR page 4.13-27) related to protection of the landmark fig tree would be required under the Revised Project. As under the Previous Project, 27 perimeter trees would be removed during construction of the St. Luke's Campus Hospital on the site of the existing 3615 Cesar Chavez Street surface parking lot. Any birds nesting in affected trees on campus could be disturbed by demolition activities. Demolition-related activity and construction equipment under the Revised Project could constitute a potentially significant impact on nesting birds. Implementation of Mitigation Measure M-BI-N1 (see Draft EIR page 4.13-19) would require preconstruction surveys before demolition and construction activities during the nesting season (February through August). If active nests are located during such surveys, Mitigation Measure M-BI-N1 would require implementation of measures which may include prohibiting construction within buffer areas around active nests, modifying construction activities, and/or removing or relocating nests. Implementation of this mitigation measure would reduce this impact to a less-than-significant level.

The Revised Project at the St. Luke's Campus would require removal of protected trees during construction. (Less than significant)

The Final EIR concluded that implementation of the Previous Project at the St. Luke's Campus would comply with the City's Urban Forestry Ordinance, and, therefore, this impact would be less than significant under the Previous Project. Demolition and construction activities would require the removal of significant trees at the St. Luke's Campus under both the Previous Project and Revised Project. CPMC

would be required to submit a tree protection plan to the City and implement the plan for trees that could be affected by construction. As under the Previous Project, CPMC would obtain a permit for tree removal from DPW, consistent with Article 16, “Urban Forestry Ordinance,” of the San Francisco Public Works Code. In addition, pursuant to Section 143 of the San Francisco Planning Code, CPMC would have to ensure that an appropriate replacement tree for each street tree removed would be planted on the project site or along the street, or would have to pay an in-lieu fee (see Draft EIR page 4.13-26). As under the Previous Project, implementation of the tree protection plan and compliance with applicable regulations under the Revised Project would reduce impacts on street and significant trees to a less-than-significant level.

3.12.2.1 SUMMARY OF BIOLOGICAL RESOURCES IMPACTS AT THE ST. LUKE'S CAMPUS

The Final EIR concluded that, because the St. Luke's Campus is located in a dense, long-developed, urban area and does not contain any waters, wetland, riparian habitat, or other sensitive habitat; no significant cumulative impacts were anticipated under the Previous Project. Although the urban landscaping of the campus provides some habitat value for protected wildlife (primarily shelter for birds), urban landscape habitat of similar quality can be found throughout San Francisco. The Final EIR concluded that with implementation of Mitigation Measure M-BI-N1, the Previous Project's contribution to the overall cumulative effect would be reduced. Therefore, the Final EIR concluded that cumulative impacts related to biological resources would be less than significant under the Previous Project. As under the Previous Project, implementation of Mitigation Measure M-BI-N1 (see Draft EIR page 4.13-19) would be required under the Revised Project. Project-level and cumulative impacts on biological resources at St. Luke's under the Revised Project would be less than significant, similar to under the Previous Project.

3.13 GEOLOGY AND SOILS

3.13.1 CATHEDRAL HILL CAMPUS

The Revised Project at the Cathedral Hill Campus would not expose people or structures to the risk of loss, injury, or death involving rupture of a known earthquake fault or strong seismic ground shaking. (Less than significant)

The Final EIR determined that development of the proposed Cathedral Hill Campus under the Previous Project would not affect the potential for exposure to the risk of loss, injury, or death related to ground shaking. The Final EIR concluded that the required permit review procedures by DBI would ensure that this impact related to both surface rupture and ground shaking would be less than significant under the Previous Project. Under the Revised Project, the development footprint of the proposed Cathedral Hill Campus would be the same as under the Previous Project. The potential for fault rupture at the Cathedral Hill Campus site is low, and new earthquake fault zones are unlikely to be designated in the near future. Under the Revised Project, the reduced-size Cathedral Hill Campus Hospital would be in full compliance with Senate Bill (SB) 1953 and SB 1661 and would provide acute-care services. As under the Previous Project, the reduced-size Cathedral Hill Campus Hospital proposed under the Revised Project would be required to comply with the seismic standards of the California Building Standards Code; the hospital must be designed and constructed in accordance with the site-specific seismic design requirements presented in applicable geotechnical investigations, consultations, and evaluations determined by the Probabilistic Seismic Hazard Analyses (PSHAs) and Deterministic Seismic Hazard Analyses (DSHAs) for the site. In addition, the Office of Statewide Health Planning and Development (OSHPD) would review the new hospital's building permit applications for compliance with the California Building

Standards Code. As under the Previous Project, the proposed Cathedral Hill Campus MOB and Van Ness Avenue pedestrian tunnel would also be required to comply with the seismic standards of the California Building Standards Code, the Department of Building Inspection (DBI), and the San Francisco Building Code (SFBC). Therefore, as under the Previous Project, impacts related to ground shaking at the proposed Cathedral Hill Campus would be less than significant under the Revised Project (see Draft EIR, page 4.14-43).

The Revised Project at the Cathedral Hill Campus would not expose people or structures to the risk of loss, injury, or death involving ground failure, including liquefaction, or 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 liquefaction or lateral spreading. (Less than significant)

The Final EIR indicated that the geotechnical investigations for the proposed Cathedral Hill Campus under the Previous Project determined that because no continuous potentially liquefiable layers were observed at the campus site, the potential for lateral spreading was very low. Therefore, the Final EIR concluded that impacts related to potential for lateral spreading and liquefaction would be less than significant under the Previous Project. The proposed Cathedral Hill Campus would not be located within a liquefaction hazard zone as established by the California Geological Survey, but would be within an area that has “moderate” susceptibility to liquefaction as mapped by the U.S. Geological Survey. A geotechnical investigation at the Cathedral Hill Campus Hospital site determined a layer of medium-dense clayey sand to be potentially liquefiable. However, the geotechnical investigation determined that the layer is deep enough below the proposed basement that liquefaction within the layer would not affect the performance of the hospital’s foundation.¹⁹ As under the Previous Project, the soils beneath the groundwater table at the proposed Cathedral Hill Campus site, including the proposed Cathedral Hill Campus MOB and Van Ness Avenue pedestrian tunnel, consist of dense to very dense sand and clayey and silty sand, which would not be susceptible to liquefaction.^{20, 21, 22} As under the Previous Project, because no continuous potentially liquefiable layers were observed at the campus site, the potential for lateral spreading would be low under the Revised Project and this impact would be less than significant.

The Revised Project at the Cathedral Hill Campus would not expose people or structures to the risk of loss, injury, or death involving landslides or be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslides. (Less than significant)

The Final EIR determined that foundation methods proposed for all structures at the Cathedral Hill Campus under the Previous Project would be consistent with the site-specific recommendations for footings, mats, lateral loads and pressures, piers, piles, floor slabs, underdrains, and subgrade elevations determined by the subsurface materials and groundwater elevations. Therefore, the Final EIR concluded that the impact related to seismic landslides would be less than significant at the Cathedral Hill Campus under the Previous Project. The proposed Cathedral Hill Campus is not located within an area susceptible

¹⁹ California Pacific Medical Center. 2004 (September 30). Geotechnical Investigation and Geologic Hazard Evaluation, hospital at the Cathedral Hill Campus, California Pacific Medical Center, San Francisco, California. San Francisco, CA. Prepared by Treadwell & Rollo, San Francisco, CA. Page 28.

²⁰ Ibid.

²¹ California Pacific Medical Center. 2009 (October 2). Updated Geotechnical Investigation Report, Cathedral Hill Medical Office Building, California Pacific Medical Center, San Francisco, California. San Francisco, CA. Prepared by Treadwell & Rollo, San Francisco, CA. Page 19.

²² California Pacific Medical Center. 2009 (March 24). Geotechnical Consultation, California Pacific Medical Center, Cathedral Hill Campus, Van Ness Avenue Connector Tunnel, San Francisco, California. San Francisco, CA. Prepared by Treadwell & Rollo, San Francisco, CA.

to seismically induced landslides. No landslides have been mapped on or near the proposed Cathedral Hill Campus, including the locations of the reduced-size Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB, and Van Ness Avenue pedestrian tunnel. As under the Previous Project, because of the sloped nature of the site, excavation and construction activities for the reduced-size Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB, and Van Ness Avenue pedestrian tunnel under the Revised Project could result in on-site seismic landsliding. However, as under the Previous Project, site-specific excavation support systems and design review would ensure that proper shoring and slope angles for temporary slopes and excavations are maintained during construction. Therefore, as under the Previous Project, impacts related to seismically induced landslides would be less than significant, because the campus would occupy the same footprint under the Revised Project (see Draft EIR, page 4.14-50).

The Revised Project at the Cathedral Hill Campus would not result in substantial erosion or loss of topsoil. (Less than significant with mitigation)

The Final EIR indicated that without proper controls at the Cathedral Hill Campus under the Previous Project, construction activities could expose loose soils to both wind and water erosion. The Final EIR concluded that implementation of Mitigation Measure M-GE-N4 at the proposed Cathedral Hill Campus would reduce Impact GE-4 to a less-than-significant level under the Previous Project. The proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB would be constructed on sites that are already developed. Construction-related activities such as excavation could result in erosion and loss of topsoil. Without proper controls, these activities would expose loose soils to both wind and water erosion, thus resulting in a potentially significant impact. However, Mitigation Measure M-GE-N4 (see Draft EIR page 4.14-54 in Section 4.14, “Geology and Soils”) under the Revised Project would require a site-specific Storm Water Pollution Prevention Plan (SWPPP), which would reduce the potential for contaminants, sediments, or pollutants in stormwater runoff to enter the combined sewer system during construction. As under the Previous Project, implementation of this mitigation measure under the Revised Project would reduce the impact to a less-than-significant level. As under the Previous Project, impacts related to erosion or loss of topsoil would be less than significant under the Revised Project.

The Revised Project at the Cathedral Hill Campus would not expose people or structures to the risk of loss, injury, or death involving ground failure, including densification or seismic settlement. (Less than significant)

As explained in the Final EIR, the geotechnical investigations at the site of the proposed Cathedral Hill Campus determined that the sandy soil above the groundwater table beneath the site is sufficiently dense and/or cohesive for densification potential to be low. The sediment in the proposed Van Ness Avenue pedestrian tunnel would be susceptible to potential settlement of 1–2 inches; however, as under the Previous Project, the tunnel would extend below this zone under the Revised Project, and potential settlement would not affect this structure. As under the Previous Project, the ground adjacent to the proposed buildings on the Cathedral Hill Campus (streets, sidewalks, and landscaped areas) could potentially experience settlement of 1–3 inches. As under the Previous Project, the material in this area would not be excavated and replaced with engineered fill as part of the Revised Project. Utility connections could be severed should seismic settlement occur, impairing Cathedral Hill Campus operations after a seismic event. However, as under the Previous Project, the proposed project design for the Revised Project would include flexible connections between off-site utilities and the campus buildings. Therefore, as under the Previous Project, this impact would be less than significant under the Revised Project.

The Revised Project at the Cathedral Hill Campus would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, resulting in subsidence or collapse. (Less than significant)

The Final EIR determined that ground subsidence related to groundwater dewatering would not be expected to occur at the construction sites at the Cathedral Hill Campus under the Previous Project, and that construction would not induce a change in groundwater at adjacent streets and properties, indirectly resulting in ground subsidence. Thus, the Final EIR concluded that the impact related to subsidence would be less than significant under the Previous Project. The soils beneath the reduced-size Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB, and Van Ness Avenue pedestrian tunnel would not be susceptible to subsidence. Accordingly, as under the Previous Project, the impact of the Revised Project related to subsidence would be less than significant.

The Revised Project at the Cathedral Hill Campus would not be located on expansive soil, nor would it be substantially affected by corrosive soils, and therefore would not create substantial risks to life or property. (Less than significant)

The Final EIR concluded that construction of the proposed Cathedral Hill Campus under the Previous Project would not affect the probability of soil expansion or the corrosivity of soils at the campus sites, and, therefore, this impact would be less than significant under the Previous Project. In addition, the soils beneath the proposed Cathedral Hill Campus Hospital, Cathedral Hill Campus MOB, and Van Ness Avenue pedestrian tunnel were determined to have a low probability of sediment expansion. Therefore, as under the Previous Project, impacts related to expansive soils would be less than significant under the Revised Project. The deeper soils are considered “moderately corrosive” and upper soils considered “mildly corrosive.” Therefore, subsurface concrete and reactive metal materials could be corroded through contact with soils over time. Also, under the Revised Project, as under the Previous Project, as part of standard engineering practices, all reinforced concrete and buried metallic piping at the proposed Cathedral Hill Campus would be properly protected against corrosion, as required. Impacts related to corrosive soils would be less than significant under both the Revised Project and the Previous Project with incorporation of protective construction measures.

The CPMC campus sites do not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available. (Less than significant)

The Final EIR concluded that because all existing campuses connect into the municipal combined stormwater/sewer system and would remain connected, this impact would be less than significant under the Previous Project. The site of the proposed Cathedral Hill Campus is in a developed area; it is connected to the municipal sewer system and would remain connected under the Revised Project. No septic tanks would be required. As under the Previous Project, this impact would be less than significant.

The Revised Project at the Cathedral Hill Campus would not change substantially the topography or any unique geologic or physical features of the sites. (Less than significant)

The Final EIR determined that although the amount of native soil and rock removed for below-grade excavation at the Cathedral Hill Campus under the Previous Project would be substantial, the change in topography would be entirely below grade and would not be visible. Additionally, it determined that no unique geologic features, such as rock outcroppings and notable hills, are present at the proposed Cathedral Hill Campus, and thus, such features would not be affected by the Previous Project. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. No unique geologic or physical features exist on the campus. Excavation, grading, and construction of the

new building would not change the grade of the surrounding vicinity. This impact would be similar to the impact of the Previous Project and would also be less than significant under the Revised Project.

3.13.1.1 SUMMARY OF GEOLOGY AND SOILS IMPACTS AT THE CATHEDRAL HILL CAMPUS

Under the Revised Project, project-level and cumulative geology and soils impacts at the proposed Cathedral Hill Campus would be less than significant and similar to those under the Previous Project. Mitigation measures required under the Previous Project would be also required for the Revised Project.

3.13.2 ST. LUKE'S CAMPUS

The Revised Project at the St. Luke's Campus would not expose people or structures to the risk of loss, injury, or death involving rupture of a known earthquake fault or strong seismic ground shaking. (Less than significant)

The Final EIR determined that development of the St. Luke's Campus under the Previous Project would not affect the potential for exposure to the risk of loss, injury, or death related to ground shaking. The Final EIR concluded that the required permit review procedures by DBI would ensure that this impact related to both surface rupture and ground shaking would be less than significant under the Previous Project. Under the Revised Project, the St. Luke's Campus Hospital would be in full compliance with SB 1953 as amended and would provide acute-care services. The St. Luke's Campus Hospital constructed under the Revised Project (as under the Previous Project) would be required to comply with the seismic standards of the California Building Standards Code and to implement site-specific seismic design requirements presented in applicable geotechnical investigations, consultations, and evaluations determined by the PSHAs and DSHAs for the site. In addition, OSHPD would review the new hospital's building permit applications for compliance with the California Building Standards Code. Under the Revised Project, the potential for fault rupture at the St. Luke's Campus site is low, and new earthquake fault zones are unlikely to be designated in the near future. Therefore, as under the Previous Project, impacts related to ground shaking at the St. Luke's Campus would be less than significant because the new buildings constructed under the Revised Project would comply with applicable seismic standards (see Draft EIR, page 4.14-43).

The Revised Project at the St. Luke's Campus would not expose people or structures to the risk of loss, injury, or death involving ground failure, including liquefaction, or 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 liquefaction or lateral spreading. (Less than significant)

The Final EIR determined that the dense to very dense sand beneath the area of the proposed St. Luke's Campus Hospital under the Previous Project would not be susceptible to liquefaction and, because no potentially liquefiable layers were observed at the campus, the potential for lateral spreading would be very low. Therefore, the Final EIR concluded that impacts related to potential for lateral spreading and liquefaction would be less than significant under the Previous Project. The St. Luke's Campus MOB would be the same under the Revised Project as under the Previous Project, and would be built on the northeast portion of the St. Luke's Campus (i.e., the site of the former St. Luke's Hospital tower, which would be demolished under both the Previous Project and the Revised Project). The St. Luke's Campus has medium-dense clayey and silty sand that is liquefiable; liquefaction-induced settlement could occur in

this area during a major earthquake on a nearby fault.²³ As under the Previous Project, the area of the St. Luke's Campus Hospital under the Revised Project would not be susceptible to liquefaction. However, the loose to medium-dense sand and gravel above and below the groundwater level at the St. Luke's Campus MOB area would be removed in its entirety and/or replaced with engineered fill, as under the Previous Project. As under the Previous Project, impacts at the St. Luke's Campus related to liquefaction, lateral spreading, and densification/seismic settlement would be less than significant under the Revised Project.

The Revised Project at the St. Luke's Campus would not expose people or structures to the risk of loss, injury, or death involving landslides or be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslides. (Less than significant)

The Final EIR determined that foundation methods proposed for all structures at the St. Luke's Campus under the Previous Project would be consistent with the site-specific recommendations for footings, mats, lateral loads and pressures, piers, piles, floor slabs, underdrains, and subgrade elevations determined by the subsurface materials and groundwater elevations. Therefore, the Final EIR concluded that at the St. Luke's Campus, the impact related to seismic landslides would be less than significant under the Previous Project. The St. Luke's Campus has no evidence of past or ongoing landslide activity. Therefore, as under the Previous Project, impacts related to seismic and a seismically induced landslide would be less than significant under the Revised Project (see Draft EIR, page 4.14-50).

The Revised Project at the St. Luke's Campus would not result in substantial erosion or loss of topsoil. (Less than significant with mitigation)

The Final EIR determined that, without proper controls at the St. Luke's Campus under the Previous Project, construction activities could expose loose soils to both wind and water erosion. The Final EIR concluded that implementation of Mitigation Measure M-GE-N4 at the St. Luke's Campus would reduce this impact to a less-than-significant level under the Previous Project. The St. Luke's Campus development under the Revised Project would be constructed on sites on campus that are already developed. Construction-related activities such as excavation could result in erosion and loss of topsoil. Without proper controls, these activities would expose loose soils to both wind and water erosion, resulting in a potentially significant impact. However, as under the Previous Project, implementation of Mitigation Measure M-GE-N4 (see Draft EIR page 4.14-54) would require a site-specific SWPPP, which would reduce the potential for contaminants, sediments, or pollutants in stormwater runoff to enter the combined sewer system during construction. Impacts under the Revised Project related to erosion or loss of topsoil would be less than significant after mitigation is incorporated. However, impacts would be slightly greater than under the Previous Project because of the increased development program at St. Luke's under the Revised Project, but less than under Alternative 3A.

The Revised Project at the St. Luke's Campus would not expose people or structures to the risk of loss, injury, or death involving ground failure, including densification or seismic settlement. (Less than significant)

The subsurface materials in the vicinity of the proposed St. Luke's Campus Hospital are generally too clayey and dense for seismic settlement to occur. As under the Previous Project, the potential for effects

²³ California Pacific Medical Center. 2010. Geology and Geotechnical Input for Environmental Impact Report, Medical Office Building, St. Luke's Replacement Hospital, San Francisco, CA. San Francisco, CA. Prepared by Treadwell & Rollo, San Francisco, CA. Page 10.

on soil beneath the St. Luke's Campus MOB would be removed during site grading. As under the Previous Project, this impact would be less than significant under the Revised Project.

The Revised Project at the St. Luke's Campus would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project, resulting in subsidence or collapse. (Less than significant with mitigation)

The Final EIR determined that under the Previous Project, dewatering had the potential to result in ground subsidence at the St. Luke's Campus MOB and utility routes sites and at adjacent streets and properties as overlying soil loses support from the volume of the water. The Final EIR determined that implementation of Mitigation Measure M-GE-N6 at the St. Luke's Campus would reduce the impact related to subsidence to a less-than-significant level under the Previous Project. Implementing this measure would prevent significant subsidence impacts through monitoring of surrounding improvements during dewatering activities and would require the immediate recharge or alteration of dewatering activities to halt settlement, should it occur. Excavation activities during construction under the Revised Project could encounter groundwater at the sites of the St. Luke's Campus Hospital, and St. Luke's Campus MOB, which would require dewatering. However, implementation of Mitigation Measure M-GE-N6 (see Draft EIR page 4.14-62), which would require a geotechnical report to be prepared to address potential subsidence impacts of dewatering, would reduce this impact to a less-than-significant level. Impacts at the St. Luke's Campus would be slightly greater under the Revised Project than under the Previous Project, because of the increased development program under the Revised Project, but less than under Alternative 3A and less-than-significant with mitigation.

The Revised Project at the St. Luke's Campus would not be located on expansive soil, nor would it be substantially affected by corrosive soils, and therefore would not create substantial risks to life or property. (Less than significant)

The Final EIR concluded that construction of the St. Luke's Campus under the Previous Project would not affect the probability of soil expansion or the corrosivity of soils at the campus sites and, therefore, this impact would be less-than-significant under the Previous Project. The soils at the St. Luke's Campus are considered "moderately corrosive" to "mildly corrosive." The clayey fill and topsoil might also be expansive, specifically within the northernmost one-third of the campus, where the St. Luke's Campus Hospital and St. Luke's Campus MOB would be constructed under both the Previous Project and the Revised Project. As under the Previous Project, impacts related to expansive soil would be less than significant at the site of the new buildings, because the excavation area for the St. Luke's Campus Hospital and St. Luke's Campus MOB would extend below the expansive soils on the northern portion of the site. Also, under the Revised Project, as under the Previous Project—and as part of standard engineering practices—all reinforced concrete and buried metallic piping at the St. Luke's Campus would be properly protected against corrosion, in accordance with the critical nature of the structure. Impacts related to corrosive soils would be less than significant under both the Revised Project and the Previous Project.

The CPMC campus sites do not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available. (Less than significant)

The Final EIR concluded that all existing campuses connect into the municipal combined stormwater/sewer system and would remain connected under the Previous Project; therefore, this impact would be less than significant under the Previous Project. The St. Luke's Campus is connected to the municipal sewer system and would remain connected under the Revised Project. No septic tanks would be required. As under the Previous Project, this impact would be less than significant.

The Revised Project at the St. Luke's Campus would not change substantially the topography or any unique geologic or physical features of the sites. (Less than significant)

The Final EIR determined that, although the amount of native soil and rock removed for below-grade excavation at the St. Luke's Campus under the Previous Project would be substantial, the change in topography would be entirely below grade and would not be visible. Additionally, it determined that no unique geologic features, such as rock outcroppings and notable hills, are present at the St. Luke's Campus, and thus, such features would not be affected by the Previous Project. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. No unique geologic or physical features exist on the St. Luke's Campus. Excavation, grading, and construction of the new buildings would not change the grade of the surrounding area. This impact would be less than significant, but slightly greater than that under the Previous Project because of the additional 9,000 cubic yards of excavation, although less than under Alternative 3A.

3.13.2.1 SUMMARY OF GEOLOGY AND SOILS IMPACT AT THE ST. LUKE'S CAMPUS

Under the Revised Project, project-level and cumulative geology and soils impacts at the St. Luke's Campus would be less than significant, but slightly greater than those under the Previous Project (although less than under Alternative 3A), because of the increased development program at this campus under the Revised Project. Mitigation measures required under the Previous Project would also be required for the Revised Project.

3.14 HYDROLOGY AND WATER QUALITY

3.14.1 CATHEDRAL HILL CAMPUS

Dewatering activities during project construction could temporarily lower the local groundwater table, but the Revised Project at the Cathedral Hill Campus would not substantially deplete groundwater supplies or interfere with recharge such that there would be a net deficit in aquifer volume or a substantial lowering of the local groundwater table. (Less than significant)

The Final EIR concluded that construction and long-term operations under the Previous Project at the proposed Cathedral Hill Campus would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and, therefore, this impact would be less than significant under the Previous Project. The site of the proposed Cathedral Hill Campus is currently highly developed with impervious surfaces or hardscape. Construction of the reduced-size Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB could result in increases in impervious surfaces. However, green roofs on both buildings would reduce the level of impervious surfaces at the site and, therefore, the Revised Project would not substantially obstruct or affect groundwater recharge.

The proposed construction activities at the Cathedral Hill Campus would result in net increases in impervious surfaces in areas that drain to the City's combined sewer system, and an increase in total or peak runoff volume could contribute to the frequency or severity of combined sewer overflow events or flooding on- or off-site. (Less than significant with mitigation)

The Final EIR determined that the total or peak runoff volume from the Cathedral Hill Campus site could increase without implementation of LID stormwater management controls under the Previous Project, which would contribute to the frequency or severity of combined sewer overflow (CSO) events. The Final EIR concluded that implementing Mitigation Measure M-HY-N2 at the proposed Cathedral Hill Campus under the Previous Project would reduce Impact HY-2 to a less-than-significant level, because stormwater

runoff from the site would be reduced by 25 percent relative to existing conditions. The development program at the proposed Cathedral Hill Campus under the Revised Project would be less intense than under the Previous Project. The reduced-size Cathedral Hill Campus Hospital would be shorter in height than under the Previous Project. However, the demolition and construction would require removal of the same amount of vegetated buffer areas as under the Previous Project, resulting in the same amounts of impervious surface at the proposed campus. The total or peak runoff volume could increase without implementation of LID stormwater management controls. The total or peak runoff volume from the proposed Cathedral Hill Campus compared to existing conditions could contribute to an increased frequency or severity of CSO events. This impact would be the same under both the Revised Project and the Previous Project because the building footprints and the amounts of impervious surface at the proposed Cathedral Hill Campus would be the same. Mitigation Measure M-HY-N2 (see Draft EIR page 4.15-31 in Section 4.15, "Hydrology and Water Quality") would require the preparation of a stormwater management design plan focusing on LID strategies and BMPs. As under the Previous Project, implementing this measure at the proposed Cathedral Hill Campus under the Revised Project would reduce the impact related to total or peak runoff volumes, to a less-than-significant level.

Excavation and other construction-related activities have the potential to degrade the quality of stormwater runoff from the CPMC campuses, but CPMC would implement a SWPPP to reduce pollution of surface water during construction. (Less than significant with mitigation)

The Final EIR determined that because of the large number of vehicles that would enter and exit the construction sites at the Cathedral Hill Campus under the Previous Project, the potential existed for loose soil to adhere to the vehicle tires. Upon exiting the construction site, the soil would be deposited on surface streets, where it would be discharged into the storm drains. The FEIR concluded that implementing Mitigation Measure M-HY-N3 at the proposed Cathedral Hill Campus would reduce Impact HY-3 to a less-than-significant level under the Previous Project. Construction of the new buildings would require excavation for the associated below-grade levels. Soil stockpiles and excavated portions of the site would be exposed to runoff if not managed properly, resulting in erosion and sedimentation being carried into the combined sewer system. This impact would be the same under the Revised Project as under the Previous Project, because the amount of excavation would be the same. As under the Previous Project, this impact would be less than significant under the Revised Project with implementation of Mitigation Measure M-HY-N3.

Changes in the intensity of land use and increases in impervious surfaces at the CPMC campuses could result in degradation of the quality of stormwater discharged to the combined sewer. (Less than significant)

The Final EIR determined that the new construction under the Previous Project would reduce pollutant loading from the proposed Cathedral Hill Campus. In addition, no streams or river courses are currently located within the proposed Cathedral Hill Campus; therefore, implementation of near-term projects would not alter a stream or river course. For those reasons, the Final EIR concluded that this impact would be less than significant under the Previous Project. Changes in the amount of impervious surfaces at the Cathedral Hill Campus under the Revised Project would be the same as under the Previous Project. Therefore, this impact would also be less than significant under the Revised Project.

Construction of the Revised Project at the Cathedral Hill Campus would not place any buildings or structures within a designated 100-year flood hazard area. (Less than significant)

The Final EIR determined that implementation of the Previous Project at the Cathedral Hill Campus would not impede or redirect flood flows, and flooding as a result of dam or reservoir failure would not

occur because the CPMC campuses are all located in urban areas with no nearby dams or reservoirs. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. In addition, the Cathedral Hill Campus is not located within a 100-year flood hazard area. Therefore, as under the Previous Project, this impact would be less-than-significant under the Revised Project.

Construction of the Revised Project at the Cathedral Hill Campus would not expose people or structures to risks from inundation by seiche, tsunami, or mudflow. (Less than significant)

The Final EIR concluded that under the Previous Project, all existing and proposed CPMC campus sites would be outside of delineated seiche, tsunami, and landslide hazard areas. Therefore, the Revised Project, like the Previous Project, would not expose people or structures to substantial risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

3.14.1.1 SUMMARY OF HYDROLOGY AND WATER QUALITY IMPACTS AT THE CATHEDRAL HILL CAMPUS

As under the Previous Project, implementation of Mitigation Measures M-HY-N2 and M-HY-N3 at the proposed Cathedral Hill Campus would be required under the Revised Project. Under the Revised Project, project-level and cumulative hydrology and water quality impacts at Cathedral Hill would be less-than-significant, and the same or less than those under the Previous Project because of the reduced development program.

3.14.2 ST. LUKE'S CAMPUS

Dewatering activities during project construction could temporarily lower the local groundwater table, but the Revised Project at the St. Luke's Campus would not substantially deplete groundwater supplies or interfere with recharge such that there would be a net deficit in aquifer volume or a substantial lowering of the local groundwater table. (Less than significant)

The Final EIR concluded that construction and long-term operations under the Previous Project at the St. Luke's Campus would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and, therefore, this impact would be less than significant. The St. Luke's Campus is currently highly developed with impervious surfaces or hardscape. Construction of the new facilities would result in minor increases in impervious surfaces under the Revised Project, but these minor increases would not substantially obstruct or affect groundwater recharge given the degree of impervious surfaces already on campus. These minor increases would be essentially the same under the Revised Project as under the Previous Project, because the development footprint would be substantially the same. As under the Previous Project, dewatering activities at the St. Luke's Campus under the Revised Project would be temporary, but would be slightly greater in extent because of the minor increase in the amount of excavation (but less than under Alternative 3A). Construction of the new buildings at the St. Luke's Campus under the Revised Project would result in a temporary less-than-significant impact on groundwater supplies, but the impact would be slightly greater than under the Previous Project because of the minor increase in the amount of excavation (but less than under Alternative 3A (see Draft EIR page 4.15-28)).

The proposed construction activities at the St. Luke's Campus would result in net increases in impervious surfaces in areas that drain to the City's combined sewer system, and an increase in total or peak runoff volume could contribute to the frequency or severity of combined sewer overflow events or flooding on- or off-site. (Less than significant with mitigation)

The Final EIR determined that the total or peak runoff volume from the St. Luke's Campus under the Previous Project could increase without implementation of LID stormwater management controls, which could contribute to the frequency or severity of CSO events. The Final EIR concluded that implementation of Mitigation Measure M-HY-N2 at the proposed St. Luke's Campus under the Previous Project would reduce Impact HY-2 to a less-than-significant level because stormwater runoff from the site would be reduced by 25 percent relative to existing conditions. Impervious surfaces at the site would be substantially similar under the Revised Project as under the Previous Project because the development footprint would be substantially the same. Without implementation of LID stormwater management controls, the total or peak runoff volume from the St. Luke's Campus could increase compared to existing conditions, which could contribute to an increased frequency or severity of CSO events. This impact would be similar under the Revised Project and the Previous Project. Mitigation Measure M-HY-N2 (see Draft EIR page 4.15-31) would require the preparation of a stormwater management design plan focusing on LID strategies and BMPs. Implementing this measure would reduce the impact related to increased total or peak runoff volumes to a less-than-significant level under the Revised Project, similar to the Previous Project.

Excavation and other construction-related activities have the potential to degrade the quality of stormwater runoff from the CPMC campuses, but CPMC would implement a SWPPP to reduce pollution of surface water during construction. (Less than significant with mitigation)

The Final EIR determined that because of the large number of vehicles that would enter and exit the construction sites at the St. Luke's Campus under the Previous Project, the potential exists for loose soil to adhere to the vehicle tires. Upon exiting the construction site, the soil would be deposited on surface streets, where it would be discharged into the storm drains. The Final EIR concluded that implementing Mitigation Measure M-HY-N3 at the St. Luke's Campus under the Previous Project would reduce this impact to a less-than-significant level. Construction of the new buildings under the Revised Project would require a somewhat greater amount of excavation than would be required under the Previous Project. Soil stockpiles and excavated portions of the site would be exposed to runoff if not managed properly, causing erosion and sedimentation to be carried into the combined sewer system. Mitigation Measure M-HY-N3 (see Draft EIR page 4.15-36) would require a site-specific SWPPP at the St. Luke's Campus under the Revised Project, as under the Previous Project. Implementation of the SWPPP would reduce the potential for contaminants, sediments, or pollutants in stormwater runoff to enter the combined sewer system during construction. This impact would be less than significant with mitigation, but somewhat greater than under the Previous Project because of the increased excavation under the Revised Project, although less than under Alternative 3A.

Changes in the intensity of land use and increases in impervious surfaces at the CPMC campuses could result in degradation of the quality of stormwater discharged to the combined sewer. (Less than significant)

The Final EIR determined that the new construction under the Previous Project would reduce pollutant loading from the St. Luke's Campus. In addition, no streams or river courses are currently located within the St. Luke's Campus; therefore, implementation of the Previous Project would not alter a stream or river course. The Final EIR concluded that this impact would be less than significant under the Previous Project. Changes in the amount of impervious surfaces at the St. Luke's Campus under the Revised

Project would be the same as under the Previous Project. Therefore, this impact would also be less than significant under the Revised Project

Construction of the Revised Project at the St. Luke's Campus would not place any buildings or structures within a designated 100-year flood hazard area. (Less than significant)

The Final EIR determined that implementation of the Previous Project at the St. Luke's Campus would not impede or redirect flood flows, and flooding as a result of dam or reservoir failure would not occur because the campus is located in an urban area with no nearby dams or reservoirs. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. In addition, the St. Luke's Campus is not located within a 100-year flood hazard area. Therefore, as under the Previous Project, this impact would be less than significant under the Revised Project.

Construction of the Revised Project at the St. Luke's Campus would not expose people or structures to risks from inundation by seiche, tsunami, or mudflow. (Less than significant)

The Final EIR determined that all existing and proposed CPMC campus sites are outside of delineated seiche, tsunami, and landslide hazard areas. Therefore, the Revised Project, like the Previous Project, would not expose people or structures to substantial risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

3.14.2.1 SUMMARY OF HYDROLOGY AND WATER QUALITY IMPACTS AT THE ST. LUKE'S CAMPUS

As under the Previous Project, implementation of Mitigation Measures M-HY-N2 and M-HY-N3 would be required under the Revised Project at the St. Luke's Campus. Under the Revised Project, project-level and cumulative hydrology and water quality impacts would be less than significant with mitigation, but slightly greater than those under the Previous Project because of the increased development program at the St. Luke's Campus under the Revised Project, although less than under Alternative 3A.

3.15 HAZARDS AND HAZARDOUS MATERIALS

3.15.1 CATHEDRAL HILL CAMPUS

Construction of the Revised Project at the Cathedral Hill Campus would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than significant with mitigation)

The Final EIR concluded that implementation of Mitigation Measures M-HZ-N1a and M-HZ-N1b would reduce impacts related to known soil and groundwater conditions at the proposed Cathedral Hill Campus to a less-than-significant level under the Previous Project. Cathedral Hill Campus construction under the Revised Project would require the demolition of the same existing structures as the Previous Project. Existing building materials could include asbestos-containing materials, lead-based paint, polychlorinated biphenyls (PCBs), and fluorescent lights containing mercury vapor. The Final EIR determined that the existing regulatory environmental framework and approval process would avoid potential hazards caused by demolition. Additionally, the Final EIR stated that Improvement Measure I-HZ-1 would further reduce the potential for exposure to PCBs and mercury by requiring the removal and disposal of equipment identified to contain these materials prior to the start of construction, including demolition or renovation. Therefore, with the implementation of existing regulations and Improvement Measure I-HZ-1

under the Revised Project, this less-than-significant impact would be further reduced, as under the Previous Project.

Known underground storage tanks (USTs) at the location of the proposed Cathedral Hill Campus Hospital site are located outside the excavation footprint for the proposed new structures under the Revised Project. As under the Previous Project, the USTs would remain in place under SFDPH's underground tank program, unless required to be moved or deemed unstable, and this impact would be potentially significant. Implementing Mitigation Measure M-HZ-N1a (see Draft EIR page 4.16-46) would require preparation and approval of a site mitigation plan, reducing impacts related to known soil and groundwater conditions to a less-than-significant level. This impact would be similar to the impact of the Previous Project because the Revised Project would have the same excavation footprint and require the same amount of excavation.

As under the Previous Project, previously unidentified contaminated soil or groundwater could be encountered during construction activities at the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB sites under the Revised Project, resulting in a potentially significant impact. Implementation of Mitigation Measure M-HZ-N1b would require the preparation and approval of unknown-contingency plans that contain management protocols for the discovery of previously unidentified soil and groundwater contamination, USTs, or other subsurface facilities. These contingency plans, subject to the approval of SFDPH, would limit the exposure of workers to unknown contaminated soil and groundwater and potentially hazardous materials in the contents and vapors of USTs and limit the off-site migration of contaminants in soil and groundwater, preventing their exposure to the public and environment. As under the Previous Project, adherence to the site-specific health and safety plans and implementation of Mitigation Measure M-HZ-N1b would reduce impacts related to known soil and groundwater conditions and impacts related to transport, use, and disposal of hazardous building materials at the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB sites under the Revised Project to less-than-significant levels. The impact of the Revised Project would be similar to the impact of the Previous Project.

As under the Previous Project, compliance with the SWPPP, San Francisco HMUPA requirements, applicable regulations and standards, and the procedures set forth in the environmental contingency plan under the Revised Project would reduce the potential for releases resulting from the transport, use, or disposal of hazardous materials during construction activities to a less-than-significant level. Impacts under the Revised Project would be similar to the impacts under the Previous Project.

Operations of the Revised Project at the Cathedral Hill Campus would not 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 during project operation. (Less than significant)

Operation of the proposed Cathedral Hill Campus would require workers to handle potentially hazardous materials. The proposed Cathedral Hill Campus would be approximately 175,000 sq. ft. smaller under the Revised Project than under the Previous Project. The Cathedral Hill Campus Hospital and MOB uses would increase the use of hazardous materials on the campus (such as medical and biological materials and associated hazardous waste) substantially over existing conditions, but this increase under the Revised Project would be less than under the Previous Project. As under the Previous Project, operation of the proposed Cathedral Hill Campus Hospital is also anticipated to produce medical- and hospital-specific hazardous wastes that are not currently produced at the site of the proposed campus. However, because of the reduced-sized hospital under the Revised Project, the proposed Cathedral Hill Campus would generate less hazardous waste than under the Previous Project. Hazardous materials and wastes would be routinely stored and used at the proposed Cathedral Hill Campus in amounts substantially larger

than under existing conditions; however, as at the existing CPMC campuses, these materials would be properly used and stored under permit of medical wastes, storage, and uses at the proposed Cathedral Hill Campus. As with the Previous Project, compliance with the San Francisco HMUPA requirements, applicable regulations and standards, and State of California requirements would reduce the potential for a release of hazardous materials during hospital operations at the proposed Cathedral Hill Campus to a less-than-significant level under the Revised Project.

The Final EIR determined that impacts from the accidental release of hazardous materials during operations at the proposed Cathedral Hill Campus under the Previous Project would be less than significant. As under the Previous Project, hazardous materials brought on-site during construction would be managed in accordance with federal, state, and local regulations. Hazardous materials storage would be managed under the oversight of the San Francisco HMUPA and through compliance with applicable regulations. Therefore, the potential for hazardous-materials emergencies and potential effects on sensitive receptors would be less than significant under the Revised Project, and less than under the Previous Project.

The Revised Project at the Cathedral Hill Campus would not emit hazardous emissions or involve handling of hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school during construction or operation. (Less than significant)

The Final EIR determined that implementation of applicable regulations and standards would ensure that hazardous air emissions from structures to be demolished would be minimized, and the Previous Project would not emit hazardous emissions or involve handling of hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school during construction or operation. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. As under the Previous Project, implementation of applicable regulations and standards would ensure that hazardous air emissions from structures to be demolished would be minimized, implementation of dust control measures in accordance with the City's Dust Control Ordinance would result in a low potential for contaminated dust to become airborne during construction, and hazardous materials handled on-campus during construction and operations would be managed in accordance with federal, state, and local regulations. Therefore, as under the Previous Project, this impact would be less than significant under the Revised Project.

The Revised Project at the Cathedral Hill Campus would not be located on a site that is included on a list of hazardous materials sites and, as a result, would not create a significant hazard to the public or the environment. (Less than significant with mitigation)

The Final EIR determined that the potential existed to encounter USTs during construction during construction at the proposed Cathedral Hill Campus under the Previous Project. The Final EIR included Mitigation Measure M-HZ-N4a and M-HZ-N4b for the proposed Cathedral Hill Campus development under the Previous Project. Mitigation Measure M-HZ-N4a would require preparation and approval of site mitigation plans (SMPs) that would contain soil and groundwater management protocols based on the site-specific environmental contingency plans (ECPs). Additionally, Mitigation Measure M-HZ-N4a requires air quality monitoring during tank removal activities and sampling of surrounding soils to ensure that leaks have not occurred. The SMPs, subject to the review and approval of SFDPH, would limit the exposure of workers to known contaminated soil and groundwater and potentially hazardous materials in the contents and vapors of USTs and limit the off-site migration of contaminants in soil and groundwater, preventing their exposure to the public and environment. Mitigation Measure M-HZ-N4b would require the preparation and approval of unknown contingency plans containing management protocols for the discovery of previously unidentified soil and groundwater contamination, USTs, or other subsurface facilities, which would limit the exposure of workers to unknown contaminated soil and groundwater and

potentially hazardous materials in the contents and vapors of USTs and limit the off-site migration of contaminants in soil and groundwater, preventing their exposure to the public and environment. The Final EIR determined that these mitigation measures would reduce impacts related to known soil and groundwater conditions at the proposed Cathedral Hill Campus to less-than-significant levels under the Previous Project. New construction at the proposed Cathedral Hill Campus under the Revised Project would occur at the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB sites, as under the Previous Project. These parcels are not identified on any lists of hazardous materials sites, with the exception of 1101 Van Ness Avenue and 1062 Geary Street. As under the Previous Project, implementation of Mitigation Measures M-HZ-N4a and M-HZ-N4b at the proposed Cathedral Hill Campus Hospital and Cathedral Hill Campus MOB sites would reduce this impact to a less-than-significant level under the Revised Project.

The Revised Project at the Cathedral Hill Campus would not be located within an airport land use plan or within 2 miles of a public airport or private airstrip, and as a result, would not create a safety hazard for people residing or working in the area. (Less than significant)

The Final EIR concluded that the proposed CPMC LRDP would not include land uses recognized by the City and County Association of Governments of San Mateo County (which prepares the comprehensive airport land use plan for San Francisco International Airport [SFO]) as a hazard to air navigation near SFO and, therefore, this impact would be less than significant under the Previous Project. The Cathedral Hill Campus is not located within an airport land use plan or within 2 miles of an airport or airstrip. Therefore, as under the Previous Project, this impact would be less than significant under the Revised Project.

The Revised Project at the Cathedral Hill Campus would not conflict with emergency response or evacuations plans during the project's construction and operational periods. (Less than significant)

The Final EIR indicated that under the Previous Project, emergency operations and evacuation plans at the existing campuses would continue to be maintained for on-site employees, patients, and visitors during construction, and existing routes and procedures would be maintained. Accordingly, the Final EIR concluded that this impact would be less than significant during construction under the Previous Project. Additionally, the Final EIR stated that CPMC has been meeting with the Hospital Council Emergency Preparedness Partnership, Emergency Medical Services, and the San Francisco Fire Department (SFFD) (including the Neighborhood Emergency Response Team) and would continue to work with these agencies on updated, comprehensive emergency planning. Therefore, the Final EIR determined that implementing the Previous Project at the various CPMC campuses would not impair implementation of or physically interfere with an adopted emergency operations plan or emergency evacuation plan. Therefore, the Final EIR determined that this impact would be less than significant during operation of the Previous Project. As under the Previous Project, the current emergency operations and evacuation plans at the existing campuses would continue to be maintained during construction, and existing routes and procedures would be maintained. As under the Previous Project, implementing the Revised Project at the CPMC campuses would not impair implementation of or physically interfere with an adopted emergency operations plan or emergency evacuation plan. Therefore, as under the Previous Project, this impact would be less than significant under the Revised Project.

3.15.1.1 SUMMARY OF HAZARD AND HAZARDOUS MATERIALS IMPACTS AT CATHEDRAL HILL CAMPUS

Project-level and cumulative impacts related to hazards and hazardous materials would be less than significant under the Revised Project, and less than those under the Previous Project because of the

reduced development program at this campus. Implementation of Mitigation Measures M-HZ-N1a, M-HZ-N1b, M-HZ-N4a and M-HZ-N4b under the Revised Project would reduce impacts related to hazards and hazardous materials at the proposed Cathedral Hill Campus to less-than-significant levels, as under the Previous Project.

3.15.2 ST. LUKE'S CAMPUS

Construction of the Revised Project at the St. Luke's Campus would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or create a significant hazard through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (Less than significant with mitigation)

The Final EIR determined that implementation of Mitigation Measures M-HZ-N1a and M-HZ-N1b, would reduce impacts related to known soil and groundwater conditions at the St. Luke's Campus under the Previous Project to less-than-significant levels. Demolition activities at the St. Luke's Campus under the Revised Project would be the same as under the Previous Project. Existing buildings to be demolished could contain asbestos-containing materials, lead-based paint, PCBs, and fluorescent lights containing mercury vapor. The Final EIR determined that the existing regulatory environmental framework and approval process would avoid potential hazards caused by demolition. Additionally, the Final EIR stated that Improvement Measure I-HZ-1 would further reduce the potential for exposure to PCBs and mercury by requiring the removal and disposal of equipment identified to contain these materials prior to the start of construction, including demolition or renovation. Therefore, with the implementation of existing regulations and Improvement Measure I-HZ-1 under the Revised Project at the St. Luke's Campus, this less-than-significant impact would be further reduced, similar to under the Previous Project.

Removal of the USTs at the location of the new St. Luke's Campus Hospital and St. Luke's Campus MOB under the Revised Project could expose workers to contaminants. This impact under the Revised Project would be similar to the impact of the Previous Project, because the Revised Project would require removal of the same USTs on the northern portion of the campus. As under the Previous Project, implementation of Mitigation Measure M-HZ-N1a under the Revised Project would reduce impacts related to known soils and groundwater conditions to a less-than-significant level.

As under the Previous Project, previously unidentified contaminated soil or groundwater could be encountered during construction activities under the Revised Project, resulting in a potentially significant impact. Implementation of Mitigation Measure M-HZ-N1b would require the preparation and approval of unknown-contingency plans that contain management protocols for the discovery of previously unidentified soil and groundwater contamination, USTs, or other subsurface facilities. These contingency plans, subject to the approval of SFDPH, would limit the exposure of workers to unknown contaminated soil and groundwater and potentially hazardous materials in the contents and vapors of USTs and limit the off-site migration of contaminants in soil and groundwater, preventing their exposure to the public and environment. Adherence to the site-specific health and safety plans and implementation of Mitigation Measure M-HZ-N1b would reduce impacts related to known soil and groundwater conditions at the St. Luke's Campus to less-than-significant levels related to transport, use, and disposal of hazardous building materials. This impact would be somewhat greater than under the Previous Project because of the somewhat larger amount of excavation under the Revised Project, but would be less than under Alternative 3A.

Operations of the Revised Project at the St. Luke's Campus would not 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 during project operation. (Less than significant)

The Final EIR determined that impacts from the accidental release of hazardous materials during operations at the St. Luke's Campus under the Previous Project would be less than significant. As under the Previous Project, hazardous materials brought on-site during construction would be managed in accordance with federal, state, and local regulations. Hazardous materials storage would be managed under the oversight of the San Francisco HMUPA and through compliance with applicable regulations. Therefore, the potential for hazardous-materials emergencies and potential effects on sensitive receptors from St. Luke's Campus operations would be less than significant under the Revised Project. However, the impact would be greater than under the Previous Project because of the larger development program under the Revised Project, but would be less than under Alternative 3A.

The Revised Project at the St. Luke's Campus would not emit hazardous emissions or involve handling of hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school during construction or operation. (Less than significant)

The Final EIR determined that implementation of applicable regulations and standards would ensure that hazardous air emissions from structures to be demolished would be minimized, and the Previous Project at the St. Luke's Campus would not emit hazardous emissions or involve handling of hazardous or acutely hazardous materials, substances, or wastes within one-quarter mile of an existing or proposed school during construction or operation. Therefore, the Final EIR concluded that this impact would be less than significant under the Previous Project. As under the Previous Project, implementation of applicable regulations and standards would ensure that hazardous air emissions from structures to be demolished would be minimized, implementation of dust control measures in accordance with the City's Dust Control Ordinance would result in a low potential for contaminated dust to become airborne during construction, and hazardous materials handled on-campus during construction and operations would be managed in accordance with federal, state, and local regulations. Therefore, as under the Previous Project, this impact would be less than significant under the Revised Project. However, the impact would be greater than under the Previous Project because of the larger development program under the Revised Project, but would be less than under Alternative 3A.

The Revised Project at the St. Luke's Campus would not be located on a site that is included on a list of hazardous materials sites and, as a result, would not create a significant hazard to the public or the environment. (Less than significant with mitigation)

The Final EIR determined that the potential to encounter USTs during construction would exist during construction at the St. Luke's Campus under the Previous Project. The Final EIR concluded that implementation of Mitigation Measures M-HZ-N4e and M-HZ-N4f would reduce impacts related to known soil and groundwater conditions at the St. Luke's Campus to a less-than-significant level under the Previous Project. The St. Luke's Campus is included in various hazardous materials databases, but the inclusion of this campus does not indicate substantial hazardous materials effects; rather, inclusion in databases indicates that activities at the site involve the use and storage of hazardous materials. As under the Previous Project, implementation of Mitigation Measures M-HZ-N4e and M-HZ-N4f would reduce this impact to a less-than-significant level under the Revised Project.

The Revised Project at the St. Luke's Campus would not be located within an airport land use plan or within 2 miles of a public airport or private airstrip, and as a result, would not create a safety hazard for people residing or working in the area. (Less than significant)

The St. Luke's Campus is not located within an airport land use plan or within 2 miles of a public airport or public-use airport or private airstrip. Therefore, as under the Previous Project, impacts related to potential safety hazards near airports would be less than significant under the Revised Project.

The Revised Project at the St. Luke's Campus would not conflict with emergency response or evacuations plans during the project's construction and operational periods. (Less than significant)

The Final EIR indicated that under the Previous Project, emergency operations and evacuation plans at the existing campuses would continue to be maintained for on-site employees, patients, and visitors during construction, and existing routes and procedures would be maintained. Therefore, the Final EIR concluded that this impact would be less than significant during construction under the Previous Project. Additionally, the Final EIR indicated that CPMC has been meeting with the Hospital Council Emergency Preparedness Partnership, Emergency Medical Services, and SFFD (including the Neighborhood Emergency Response Team) and would continue to work with these agencies on updated, comprehensive emergency planning. Therefore, the Final EIR concluded that implementing the Previous Project at the various CPMC campuses would not impair implementation of or physically interfere with an adopted emergency operations plan or emergency evacuation plan. Therefore, the Final EIR concluded that this impact would be less than significant during operation of the Previous Project. As under the Previous Project, the current emergency operations and evacuation plans at the existing campuses would continue to be maintained during construction, and existing routes and procedures would be maintained. As under the Previous Project, implementing the Revised Project at the CPMC campuses would not impair implementation of or physically interfere with an adopted emergency operations plan or emergency evacuation plan. Therefore, as under the Previous Project, this impact would be less than significant under the Revised Project.

3.15.2.1 SUMMARY OF HAZARDS AND HAZARDOUS MATERIALS AT THE ST. LUKE'S CAMPUS

As under the Previous Project, implementation of Mitigation Measures M-HZ-N1a, M-HZ-N1b, M-HZ-N1d, M-HZ-N1e, M-HZ-N1f, M-HZ-N4e and M-HZ-N4f would be required at the St. Luke's Campus under the Revised Project. Project-level and cumulative impacts related to hazards and hazardous materials would be less than significant under the Revised Project, but somewhat greater than those under the Previous Project (although less than under Alternative 3A) because of the increased development program at this campus.

3.16 MINERAL AND ENERGY RESOURCES

3.16.1 CATHEDRAL HILL AND ST. LUKE'S CAMPUSES

The Revised Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the state, nor would it result in the loss of availability of a locally important mineral resource. (No impact)

The Final EIR explained that no mineral resources are known to exist at any of the campuses that would be considered of value to the region or the state. Because there are no known valuable mineral resources and none are known to have occurred historically, the Final EIR concluded that implementing the Previous Project would have no impact related to the loss of availability of locally important mineral resources. As under the Previous Project, the Revised Project would not result in impacts related to mineral resources.

*The Revised Project would encourage activities that would result in the use of large amounts of fuel, water, and energy; however, these resources would not be used in a wasteful manner. (**Less than significant**)*

The Final EIR concluded that because CPMC would comply with existing regulations related to energy efficiency in implementing the Previous Project, this impact would be less than significant. The level of energy consumption under the Revised Project would be similar to the aggregate consumption at the CPMC campuses proposed under the Previous Project. Overall energy efficiency is expected to improve, under both the Previous and Revised Projects, with the decommissioning, demolition, and replacement of older, more energy-intensive buildings. The new campus buildings would be required to conform to conservation standards specified in California Code of Regulations Title 24 and, where applicable, to the City's Green Building Ordinance. Under the Revised Project, energy efficiency would increase relative to existing conditions because of the new construction. As under the Previous Project, no mitigation measures would be required under the Revised Project. Project-level and cumulative impacts on mineral and energy resources on a campus-wide basis would be less than significant, and similar to impacts of the Previous Project.

3.17 AGRICULTURAL AND FOREST RESOURCES

3.17.1 CATHEDRAL HILL AND ST. LUKE'S CAMPUSES

*The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; would not conflict with existing zoning for agricultural use, or a Williamson Act contract; and would not involve other changes in the existing environment that, because of their location or nature, could result in conversion of Farmland of Statewide Importance to nonagricultural use. (**No impact**)*

*The project would not result in conflicts with existing zoning for, or cause rezoning of, forest land or timberland. (**No Impact**)*

*The project would not result in the loss of forest land or conversion of forest land to nonforest use. (**No Impact**)*

The CPMC campuses do not contain agricultural uses and are not zoned for agriculture. As under the Previous Project, no mitigation measures are required under the Revised Project. Therefore, like the Previous Project, the Revised Project would not result in project-level and cumulative impacts on agricultural and forest resources.

3.18 GROWTH INDUCING IMPACTS

3.18.1 CATHEDRAL HILL CAMPUS AND ST. LUKE'S CAMPUS

As discussed in Section 4.3, "Population, Employment, and Housing" of the Draft EIR, implementing the Previous Project would not induce substantial citywide population or employment growth. As under the Previous Project and Alternative 3A, the Revised Project would increase on-site development at the proposed Cathedral Hill Campus and St. Luke's Campus as compared to existing conditions. Thus, there would be an incremental increase of population in San Francisco and in the Bay Area as a whole. As under the Previous Project, the projected growth in CPMC personnel could induce population growth in San Francisco as new employees migrate to San Francisco. Assuming that existing commute patterns of CPMC personnel would remain the same, under the Previous Project, this projected household and

population growth would account for approximately 3 percent of the 2006–2030 population and household growth projected by the Association of Bay Area Governments.

According to the City’s 2004 Housing Element, San Francisco has the capacity to accommodate approximately an additional 45,450 housing units within the January 1999 through June 2006 planning period.²⁴ By subtracting housing production since adoption of the Housing Element, San Francisco has a current capacity to support approximately 34,100 housing units. Thus, the City could accommodate all of the projected growth in housing demand generated under the Previous Project within the planning period. The projected increase in housing demand from the Previous Project (1,490 housing units) would account for approximately 4 percent of San Francisco’s available capacity before taking into account existing available supply of vacant housing units (estimated at 17,100 units) is considered. Therefore, the Final EIR concluded that growth-inducing impacts of the Previous Project would be less than significant.

Under the Revised Project, the overall amount of development at the CPMC campuses would be reduced in comparison to the Previous Project. Therefore, growth-inducing impacts of the Revised Project would be less than significant, and less than under the Previous Project.

3.19 CUMULATIVE IMPACTS

3.19.1 CATHEDRAL HILL CAMPUS AND ST. LUKE'S CAMPUS

Under the Previous Project (i.e., LRDP), construction of the proposed Cathedral Hill Campus was expected to begin in 2011 and would continue for approximately 4½ years. Under the Revised Project, construction of the Cathedral Hill Campus is expected to begin in 2014 and would continue for approximately 4½ years, similar to under the Previous Project.

Under the Previous Project, construction of the proposed St. Luke’s Campus was expected to begin in 2011 and would continue for approximately 4 years. Under the Revised Project, construction of the St. Luke’s Campus is expected to begin in 2015 and would continue for approximately 4 years, similar to under the Previous Project.

The current development proposals in the pipeline for San Francisco are similar to those that were in development during publication of the Draft EIR (see Table 4.3-11 in the Draft EIR, page 4.3-45). As such, while construction is expected to begin in 2014 (as opposed to 2011 under the Previous Project), the length of construction under the Revised Project would be similar to under the Previous Project, therefore the Revised Project, along with other foreseeable cumulative developments would not have adverse citywide impacts.

²⁴ San Francisco Planning Department. 2004. *2004 Adopted Housing Element—Part 1: Data Needs and Analysis*. San Francisco, CA.

4.0 CONCLUSION

4.1 CEQA CONCLUSION

Based on the analysis and discussion presented in this Addendum, the Department concludes that the analyses conducted and the conclusions reached in the Final EIR certified on April 26, 2012 remain valid, and that no supplemental environmental review is required for the Revised Project, pursuant to the CEQA Guidelines Sections 15162, 15163, and 15164. The Revised Project would not cause any new significant environmental impacts not identified in the Final EIR, or result in a substantial increase in the severity of previously identified significant impacts, and no new, feasible project alternatives or mitigation measures considerably different from others previously analyzed have been identified that would clearly lessen the environmental impacts of the project, but that the Project Sponsor has declined to adopt. No changes have occurred with respect to circumstances surrounding the original project that would cause significant environmental impacts to which the Revised Project would contribute considerably, and no new information has been put forward which shows that the Revised Project would cause new or substantially more severe significant environmental impacts. Therefore, no supplemental environmental review is required beyond this Addendum.

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

Date

May 6th, 2013

Sarah Jones, Acting Environmental Review Officer
for John Rahaim, Director of Planning

Viktoniya Wise for

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APPENDIX A:

TABLE I:

COMPARISON OF IMPACT LEVELS AND MITIGATION MEASURES FOR PREVIOUS
PROJECT AND REVISED PROJECT

TABLE II:

COMPARISON OF IMPACT LEVELS AND IMPROVEMENT MEASURES FOR
PREVIOUS PROJECT AND REVISED PROJECT

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Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---|---|--|
| Potentially significant impact to buried or submerged historic resources, human remains or unassociated funerary objects. | A-1 MITIGATION MEASURES AGREED TO BY PROJECT SPONSOR | Same as for Previous Project. |
| | CULTURAL AND PALEONTOLOGICAL RESOURCES <i>M-CP-N2 (Cathedral Hill with or without Variants):</i> Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effects from the proposed project on buried or submerged historical resources. CPMC shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall undertake an archaeological testing program as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant's work shall be conducted in accordance with this measure and with the requirements of the project archaeological research design and treatment plan completed for this CPMC campus site ¹ at the direction of the Environmental Review Officer (ERO). In instances of | |

¹ This refers to individual archaeological research design/treatment plans prepared by Archeo-Tec and AECOM for the CPMC LRDP in January 2010 and June 2010. Separate plans were prepared for the Cathedral Hill Campus, Pacific Campus, Davies Campus, and St. Luke's Campus. Each of these plans is on file with the Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103 in Case No. 2005.0555E.

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>inconsistency between the requirement of the project archaeological research design and treatment plan and of this archaeological mitigation measure, the requirements of this archaeological mitigation measure shall prevail. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the proposed LRDP for up to a maximum of 4 weeks. At the direction of the ERO, the suspension of construction can be extended beyond 4 weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archaeological resource, as defined in the State CEQA Guidelines, Section 15064.5(a)(c).</p> <p><i>Archaeological Testing Program.</i> The archaeological consultant shall prepare and submit to the ERO for review and approval an archaeological testing plan (ATP). The archaeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archaeological resource(s) that could be adversely affected by the proposed LRDP, the testing method to be used, and the locations recommended for testing. The purpose of the archaeological testing program will be to determine, to the extent possible, the presence or absence of archaeological resources and to identify and evaluate whether any archaeological resource encountered on the site constitutes a historical resource under CEQA.</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>At the completion of the archaeological testing program, the archaeological consultant shall submit a written report of the findings to the ERO. If, based on the archaeological testing program, the consultant finds that significant archaeological resources may be present, the ERO in consultation with the consultant shall determine whether additional measures are warranted. Additional measures that may be undertaken include additional archaeological testing, archaeological monitoring, and/or an archaeological data recovery program. If the ERO determines that a significant archaeological resource is present and that the resource could be adversely affected by the proposed LRDP, at the discretion of CPMC either (a) the proposed LRDP shall be redesigned so as to avoid any adverse effect on the significant archaeological resource; or (b) a data recovery program shall be implemented unless the ERO determines that the archaeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.</p> <p><i>Archaeological Monitoring Program.</i> If the ERO in consultation with the archaeological consultant determines that an archaeological monitoring program shall be implemented, the archaeological monitoring program shall, at a minimum, include the following provisions:</p> <ul style="list-style-type: none"> ▶ The archaeological consultant, CPMC, and ERO shall meet and consult on the scope of the AMP reasonably prior to commencement of any project-related soil-disturbing activities. The ERO in consultation with the archaeological consultant shall determine what project activities shall be archaeologically monitored. In most | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>cases, any soil-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archaeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context.</p> <ul style="list-style-type: none"> ▶ The archaeological consultant shall advise all project contractors to be alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archaeological resource. ▶ The archaeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archaeological consultant and the ERO until the ERO has, in consultation with the consultant, determined that project construction activities could have no effects on significant archaeological deposits. ▶ The archaeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis. ▶ If an intact archaeological deposit is encountered, all soil-disturbing activities in the vicinity of the deposit shall cease. The archaeological monitor shall be empowered to temporarily redirect demolition/excavation/pile-driving/construction activities and equipment until the deposit is evaluated. If, in the case of pile-driving activity | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|---|
| | <p>(foundation, shoring, etc.), the archaeological monitor has cause to believe that the pile driving may affect an archaeological resource, the pile-driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archaeological consultant shall immediately notify the ERO of the encountered archaeological deposit. The archaeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological deposit, and to present the findings of this assessment to the ERO.</p> <p>Whether or not significant archaeological resources are encountered, the archaeological consultant shall submit a written report of the findings of the monitoring program to the ERO.</p> <p><i>Archaeological Data Recovery Program.</i> The archaeological data recovery program shall be conducted in accordance with an archaeological data recovery plan (ADRP). The archaeological consultant, CPMC, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archaeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information that the archaeological resource is expected to contain (i.e., the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions). Data recovery, in general, should be</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>limited to the portions of the historical property that could be adversely affected by the proposed LRDP. Destructive data recovery methods shall not be applied to portions of the archaeological resources if nondestructive methods are practical.</p> <p>The scope of the ADRP shall include the following elements:</p> <ul style="list-style-type: none"> ▶ <i>Field Methods and Procedures.</i> Descriptions of proposed field strategies, procedures, and operations. ▶ <i>Cataloguing and Laboratory Analysis.</i> Description of selected cataloguing system and artifact analysis procedures. ▶ <i>Discard and Deaccession Policy.</i> Description of and rationale for field and post-field discard and deaccession policies. ▶ <i>Interpretive Program.</i> Consideration of an on-site/off-site public interpretive program during the course of the archaeological data recovery program. ▶ <i>Security Measures.</i> Recommended security measures to protect the archaeological resource from vandalism, looting, and unintentionally damaging activities. • <i>Final Report.</i> Description of proposed report format and distribution of results. • <i>Curation.</i> Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>accession policies of the curation facilities.</p> <p><i>Human Remains and Associated or Unassociated Funerary Objects.</i> The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity shall comply with applicable federal and state laws. This shall include immediate notification of the county coroner of the City and County of San Francisco and, in the event of the coroner's determination that the human remains are Native American remains, notification of the NAHC, which shall appoint an MLD (PRC Section 5097.98). The archaeological consultant, CPMC, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (State CEQA Guidelines Section 15064.5[d]). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.</p> <p><i>Chinese and Japanese Archaeological Sites.</i> In the event of discovery of a potentially CRHR-eligible Overseas Chinese or Japanese archaeological deposit, the appropriate descendent representative organization, that is, the Chinese Historic Society of America or the National Japanese American Historical Society, shall be notified and shall be allowed the opportunity to monitor and advise further mitigation efforts, including archaeological identification, evaluation, interpretation, and public interpretive efforts.</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---|--|--|
| | <p><i>Final Archaeological Resources Report.</i> The archaeological consultant shall submit a draft final archaeological resources report (FARR) to the ERO that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing/monitoring/data recovery program(s) undertaken. Information that may put any archaeological resource at risk shall be provided in a separate removable insert within the final report.</p> <p>Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one copy, and the ERO shall receive one copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis Division (MEA) of the Planning Department shall receive two copies (bound and unbound) of the FARR and one unlocked, searchable PDF copy on a compact disk. MEA shall receive a copy of any formal site recordation forms (California Department of Parks and Recreation Form 523 series) and/or documentation for nomination to NRHP/CRHR. In instances of high public interest in or high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.</p> | |
| Potentially significant impact to buried or submerged historic resources, human remains or unassociated funerary objects. | <p><i>Mitigation Measure M-CP-N2 (Davies [near-term] and St. Luke's with or without project variants)</i></p> <p>This mitigation measure is identical to Mitigation Measure M-CP-N2 for the Cathedral Hill Campus.</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p><i>Mitigation Measure M-CP-N3 (Cathedral Hill and St. Luke's with or without variants and Davies [near-term])</i></p> <p>For each of the CPMC campuses where earthmoving activities would occur in the Colma Formation, slope debris and ravine fill sediments, and older native sediments (as identified in the applicable geotechnical reports for each campus), CPMC shall implement the following measures:</p> <ul style="list-style-type: none"> • Before the start of any earthmoving activities, CPMC shall retain a qualified paleontologist or archaeologist to train all construction personnel involved with earthmoving activities, including the site superintendent, regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures should fossils be encountered. <p>If paleontological resources are discovered during earthmoving activities, the construction crew shall immediately cease work near the find and notify CPMC and the San Francisco Planning Department. CPMC shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with SVP guidelines.² The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, museum</p> | |

² Society of Vertebrate Paleontology. 1996. Conditions of Receivership for Paleontologic Salvage Collections (final draft). *Society of Vertebrate Paleontology News Bulletin* 166:31–32.

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------------|---|--|
| Transit Delay | <p>storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered.</p> <p><i>Mitigation Measure M-CP-N4 (Cathedral Hill, Davies (near-term) and St. Luke's)</i></p> <p>This mitigation measure is identical to Mitigation Measure M-CP-N2, above.</p> <p>CPMC shall ensure that the transit delay impact related to the Cathedral Hill Campus project on the 49-Van Ness-Mission is reduced to a less-than-significant level by financially compensating the SFMTA for the cost of providing the service needed to accommodate the project at proposed levels of service. The financial contribution shall be calculated and applied in a manner that is consistent with the SFMTA cost/scheduling model. The amount and schedule for payment and commitment to application of service needs shall be set forth in a Transit Mitigation Agreement between CPMC and SFMTA.</p> | Same as for Previous Project |
| Transit Delay | <p><i>Mitigation Measure MM-TR-30 (Cathedral Hill)</i></p> <p>CPMC shall ensure that the transit delay impact related to the Cathedral Hill Campus project on the 38/38L-Geary is reduced to a less-than-significant level by financially compensating the SFMTA for the cost of providing the service needed to accommodate the project at proposed levels</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------------------|--|--|
| Transit Delay | <p>of service. The financial contribution shall be calculated and applied in a manner that is consistent with the SFMTA cost/scheduling model. The amount and schedule for payment and commitment to application of service needs shall be set forth in a Transit Mitigation Agreement between CPMC and SFMTA.</p> <p><i>Mitigation Measure MM-TR-31 (Cathedral Hill)</i></p> <p>CPMC shall ensure that the transit delay impact related to the Cathedral Hill Campus project on the 19-Polk is reduced to a less-than-significant level by financially compensating the SFMTA for the cost of providing the service needed to accommodate the project at proposed levels of service. The financial contribution shall be calculated and applied in a manner that is consistent with the SFMTA cost/scheduling model. The amount and schedule for payment and commitment to application of service needs shall be set forth in a Transit Mitigation Agreement between CPMC and SFMTA.</p> | Same as for Previous Project. |
| Loading Dock – Traffic Impacts | <p><i>Mitigation Measure MM-TR-44 (Cathedral Hill): Loading Dock Restrictions and Attendant</i></p> <p>To minimize the potential disruptions to intersections operations and safety, CPMC shall schedule delivery trucks longer than 46 feet in length to only arrive and depart between 10 p.m. and 5 a.m., when traffic volumes on Franklin Street are lower and when there would be a less likely chance that queues would form behind the truck and extend into adjacent intersections. Because some disruption may still occur</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------------------------|---|--|
| Construction – Transportation Impact | <p>between 10 p.m. and midnight, CPMC shall monitor and document truck deliveries occurring between 10 p.m. and midnight for a period of 6 months following full building occupancy/program implementation, recording truck size, number of lanes blocked by delivery trucks and for how long, and whether operations at the intersection of Franklin/Geary are temporarily affected and for how long. CPMC shall submit the truck loading report to the Planning Department and SFMTA. Based on the truck loading report and review, the deliveries by trucks longer than 46 feet in length may be modified. An attendant at the loading dock shall also be present to stop on-coming traffic while delivery trucks maneuver into the service loading area.</p> <p><i>Mitigation Measure TR-55 (Cathedral Hill)</i></p> <p>CPMC shall develop and implement a Construction Transportation Management Plan (TMP) to anticipate and minimize impacts of various construction activities associated with the Proposed Project.</p> <p>The Plan would disseminate appropriate information to contractors and affected agencies with respect to coordinating construction activities to minimize overall disruptions and ensure that overall circulation is maintained to the extent possible, with particular focus on ensuring pedestrian, transit, and bicycle connectivity. The program would supplement and expand, rather than modify or supersede, any manual, regulations, or provisions set forth by Caltrans, SFMTA,</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>DPW, or other City departments and agencies.</p> <p>Specifically, the plan should:</p> <p>Identify construction traffic management best practices in San Francisco, as well as others that, although not being implemented in the City, could provide valuable information for the project. Management practices include, but are not limited to</p> <ul style="list-style-type: none"> Identifying ways to reduce construction worker vehicle trips through transportation demand management programs and methods to manage construction work parking demands. Identifying best practices for accommodating pedestrians, such as temporary pedestrian wayfinding signage or temporary walkways. Identifying ways to accommodate transit stops located at sidewalks slated for closure during construction. This may include identifying locations for temporary bus stops, as well as signage directing riders to those temporary stops. Identifying ways to consolidate truck delivery trips, including a plan to consolidate deliveries from a centralized construction material and equipment storage facility. Identifying best practices for managing traffic flows on Van Ness Avenue during the nighttime hours for the period when tunnel construction would involve surface | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>construction activities. This may include coordination with Caltrans on appropriate traffic management practices and lane closure procedures.</p> <p>Describe procedures required by different departments and/or agencies in the city for implementation of a Construction TMP, such as reviewing agencies, approval processes, and estimated timelines. For example,</p> <ul style="list-style-type: none"> • CPMC shall coordinate temporary and permanent changes to the transportation network within the City of San Francisco, including traffic, street and parking changes and lane closures, with the SFMTA. Any permanent changes may require meeting with the SFMTA Board of Directors or one of its sub-Committees. This may require a public hearing. Temporary traffic and transportation changes must be coordinated through the SFMTA's Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) and would require a public meeting. As part of this process, the Construction Plan may be reviewed by SFMTA's Transportation Advisory Committee (TASC) to resolve internal differences between different transportation modes. • Caltrans Deputy Directive 60 (DD-60) requires TMP and contingency plans for all state highway activities. These plans should be part of the normal project development process and must be considered during the planning stage to allow for the proper cost, scope and scheduling of the TMP activities on Caltrans right-of-way. These plans should adhere to Caltrans standards and guidelines for | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>stage construction, construction signage, traffic handling, lane and ramp closures and TMP documentation for all work within Caltrans right-of-way.</p> <p>Require consultation with other Agencies, including Muni/SFMTA and property owners on Cedar Street, to assist coordination of construction traffic management strategies as they relate to bus-only lanes and service delivery on Cedar Street. CPMC should proactively coordinate with these groups prior to developing their Plan to ensure the needs of the other users on the blocks addressed within the construction TMP for the project.</p> <p>Identify construction traffic management strategies and other elements for the project, and present a cohesive program of operational and demand management strategies designed to maintain acceptable levels of traffic flow during periods of construction activities. These include, but are not limited to, construction strategies, demand management activities, alternative route strategies, and public information strategies.</p> <p>Develop a public information plan to provide adjacent residents and businesses with regularly-updated information regarding project construction, including construction activities, peak construction vehicle activities (e.g., concrete pours), travel lane closures, and other lane closures.</p> <p>The Construction Transportation Management Plan shall be submitted to SFMTA, SFDPW, and the Planning Department for review and approval.</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------|---|--|
| Transit Delay | <p><i>Mitigation Measure MM-TR-134 (Cathedral Hill)</i></p> <p>CPMC shall ensure that the transit delay impact related to the Cathedral Hill Campus project on the 47-Van Ness is reduced to a less-than-significant level by financially compensating the SFMTA for the cost of providing the additional service needed to accommodate the project at proposed levels of service. The financial contribution shall be calculated and applied in a manner that is consistent with the SFMTA cost/scheduling model. The amount and schedule for payment and commitment to application of service needs shall be set forth in a Transit Mitigation Agreement between CPMC and SFMTA.</p> | Same as for Previous Project. |
| Transit Delay | <p><i>Mitigation Measure MM-TR-137 (Cathedral Hill)</i></p> <p>CPMC shall ensure that the transit delay impact related to the Cathedral Hill Campus project on the 3-Jackson is reduced to a less-than-significant level by financially compensating the SFMTA for the cost of providing the service needed to accommodate the project at proposed levels of service. The financial contribution shall be calculated and applied in a manner that is consistent with the SFMTA cost/scheduling model. The amount and schedule for payment and commitment to application of service needs shall be set forth in a Transit Mitigation Agreement between CPMC and SFMTA.</p> | Same as for Previous Project. |
| NOISE | | |
| Construction Noise | <i>Mitigation Measure M-NO-N1a (Cathedral Hill)</i> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>CPMC shall minimize the impacts of construction noise where feasible by implementing the measures listed below in accordance with the San Francisco Noise Control Ordinance. These measures shall be required in each contract agreed to between CPMC and a contractor under the LRDP and shall be applied to all projects and programs covered by the CPMC LRDP EIR.</p> <ul style="list-style-type: none"> • Construction equipment shall be properly maintained in accordance with manufacturers' specifications and shall be fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All hand-operated impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded. • Construction equipment shall not idle for extended periods (no more than 5 minutes) of time near noise-sensitive receptors. • Stationary equipment (compressors, generators, and cement mixers) shall be located as far from sensitive receptors as feasible. Sound attenuating devices shall be placed adjacent to individual pieces of stationary source equipment located within 100 feet of sensitive receptors during noisy operations to prevent line-of-sight to such receptors, where feasible. • Temporary barriers (noise blankets or wood paneling) shall be placed around the construction site parcels and, to the extent feasible, they should break the line of sight from noise sensitive receptors to construction activities. If | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------|---|--|
| Construction Noise | <p>the use of heavy construction equipment is occurring on-site within 110 feet of an adjacent sensitive receptor, the temporary barrier located between source and sensitive receptor shall be no less than 10 feet in height. For all other distances greater than 110 feet from source to receptor, the temporary noise barrier shall be no less than 8 feet in height. For temporary sound blankets, the material shall be weather and abuse resistant, and shall exhibit superior hanging and tear strength with a surface weight of at least 1 pound per square foot. Procedures for the placement, orientation, size, and density of acoustical barriers shall be reviewed and approved by a qualified acoustical consultant.</p> <p>When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that would completely close the gaps, and would be dense enough to attenuate noise.</p> <p><i>Mitigation Measure M-NO-N1b (Cathedral Hill)</i></p> <p>A community liaison shall be designated by CPMC. The community liaison shall be available to manage and respond to noise complaints from nearby sensitive receptors. The community liaison shall keep a log of all relevant and appropriate complaints and responses to those complaints through a website that can be accessed and viewed by the public. The log or a copy of the log shall also be available upon request to any affected citizen or their representative.</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------|---|--|
| Construction Noise | <p>The community liaison shall produce a weekly and six-week schedule of construction operations and shall provide this schedule in advance and upon request to any affected citizens or their representatives. Contact information for the community liaison shall be posted in a location that is clearly visible to the nearby receptors most likely to be disturbed. The community liaison shall be responsible for ensuring that reoccurring noise complaints are evaluated by a qualified acoustical consultant to determine and implement appropriate noise control measures that would be taken to meet applicable standards. The community liaison shall contact nearby noise-sensitive receptors and shall advise them of the construction schedule.</p> <p><i>Mitigation Measure M-NO-N1c (Cathedral Hill)</i></p> <p>A construction noise management plan shall be prepared by a qualified acoustical consultant. The noise management plan shall include, but shall not be limited to, the following tasks:</p> <p>A detailed evaluation of nighttime tunnel construction at noise-sensitive receptors shall be prepared. The evaluation shall include calculations of construction noise levels based on detailed information regarding construction methods and duration. If it is determined that construction noise levels would exceed City noise ordinance standards, a qualified acoustical consultant shall review and approve additional mitigation measures to minimize prolonged sleep disturbance (e.g., using acoustical treatments to existing buildings, such as upgraded weatherstripping or determining the feasibility of constructing a cantilevered overhang along temporary barriers</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>around the construction area to reduce construction noise levels at elevated receptors). Long-term (24-hour) and short-term (15-minute) noise measurements shall be conducted at ground level and elevated locations to represent the noise exposure of noise-sensitive receptors adjacent to the construction area. The measurements shall be conducted for at least 1 week during the onset of each of the following major phases of construction: demolition, excavation, and structural steel erection. Measurements shall be conducted during both daytime and nighttime hours of construction, with observations and recordings to document combined noise sources and maximum noise levels of individual pieces of equipment. If noise levels from construction activities are found to exceed City standards (daytime [80 dB at a distance of 100 feet] or nighttime [5 dB over ambient]) and result in complaints that are lodged with the community liaison, additional noise mitigation measures shall be identified. These measures shall be prepared by the qualified acoustical consultant. These measures shall identify the noise level exceedance created by construction activities and identify the anticipated noise level reduction with implementation of mitigation. These measures may include, among other things, additional temporary noise barriers at either the source or the receptor; operational restrictions on construction hours or on heavy construction equipment where feasible; temporary enclosures to shield receptors from the continuous engine noise of delivery trucks during offloads (e.g., concrete pump trucks during foundation work); or lining temporary noise barriers with sound absorbing materials. Measures such as these have been demonstrated to be effective in keeping</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--|---|---|
| | construction noise levels within 80 dB at a distance of 100 feet. | |
| Construction Noise | <p><i>Mitigation Measure M-NO-N1 (Davies [near-term])</i></p> <p>This mitigation measure is similar to Mitigation Measures M-NO-N1a, M-NO-N1b, and M-NO-N1c for the Cathedral Hill Campus but differs in that evaluation of interior construction noise levels at on-site receptors by a qualified acoustical consultant shall be required if the number of complaints to the community liaison becomes excessive and warrants further action.</p> | Same as for Previous Project. |
| Construction Noise | <p><i>Mitigation Measure M-NO-N1 (St. Luke's Campus with or without Variants)</i></p> <p>This mitigation measure is identical to Mitigation Measures M-NO-N1a, M-NO-N1b, and M-NO-N1c for the Cathedral Hill Campus.</p> | Same as for Previous Project. |
| Loading Dock Noise (Aduomed Operation) | <p><i>Mitigation Measure M-NO-N3b (Cathedral Hill Campus with or without Variants)</i></p> <p>Bay doors [for the loading dock on Franklin Street] shall be required to be closed during Aduomed operations, to the extent feasible.</p> | Same as for Previous Project. |
| Loading Dock Noise (Aduomed Operation) | <p><i>Mitigation Measure M-NO-N3c (Cathedral Hill Campus with or without Variants)</i></p> <p>In the event that it is determined to be infeasible for bay doors to be closed during Aduomed operation, a noise-absorptive</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------------------------|---|--|
| Noise – Operations | <p>material shall be applied (prior to initiation of Aduromed operations with open bay doors) to the entire ceiling structure of the loading dock area to reduce noise levels from Aduromed operations. The material shall have a minimum Noise Reduction Coefficient of 0.75.</p> <p><i>Mitigation Measure M-NO-N3d (Cathedral Hill Campus with or without Variants)</i></p> <p>Noise attenuators shall be included on kitchen exhaust fans located on Level 5 of the Cathedral Hill Campus Hospital adjacent to patient rooms, or the sound power levels of the exhaust fans shall be limited. Hospital Facilities Management/Engineering shall review the effectiveness of attenuators.</p> | Same as for Previous Project. |
| Noise – Oxygen Deliveries | <p><i>Mitigation Measure M-NO-N3e (Cathedral Hill Campus)</i></p> <p>Delivery of oxygen to the proposed Cathedral Hill Campus shall not be scheduled during hours when church activities are typically taking place. Communication shall be established between the adjacent churches and CPMC, and a mutually acceptable time for delivery of oxygen shall be determined.</p> | Same as for Previous Project. |
| Noise – Operations | <p><i>Mitigation Measure M-NO-N3 (Davies [near-term])</i></p> <p>CPMC shall retain the services of a qualified acoustical consultant to conduct an additional site-specific noise study to evaluate and establish the appropriate ambient noise levels at the Davies Campus for purposes of a detailed HVAC and emergency generator noise reduction analysis. The recommendations of the acoustical consultant shall include</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------|--|--|
| Noise – Operations | <p>specific equipment design and operations measures to reduce HVAC and emergency generator noise to acceptable levels for exterior and interior noise levels as specified in the San Francisco Noise Control Ordinance.</p> <p><i>Mitigation Measure M-NO-N3 (St. Luke’s Campus)</i></p> <p>This mitigation measure is identical to Mitigation Measure M-NO-N3 for the Davies Campus and Mitigation Measure M-NO-N3a for the Cathedral Hill Campus.</p> | Same as for Previous Project. |
| Noise – Operations | <p><i>Mitigation Measure M-NO-N4 (Cathedral Hill Campus)</i></p> <p>CPMC shall obtain the services of a qualified acoustical consultant to perform a detailed interior-noise analysis and develop noise-insulating features for the habitable interior spaces of the proposed Cathedral Hill Campus Hospital that would reduce the interior traffic-noise level inside the hospital to 45-dB L_{dn}. Interior spaces of the hospital shall be designed to include insulating features (e.g., laminated glass, acoustical insulation, and/or acoustical sealant) that would reduce interior noise levels to 45 dB L_{dn} or lower.</p> | Same as for Previous Project. |
| Noise – Operations | <p><i>Mitigation Measure M-NO-N4 (St. Luke’s Campus)</i></p> <p>CPMC shall obtain the services of a qualified acoustical consultant to perform a detailed interior-noise analysis and develop noise-insulating features for the habitable interior spaces of the proposed St. Luke’s Campus Hospital that would reduce the interior traffic-noise level inside the hospital to 45-dB L_{dn}. Interior spaces of the hospital shall be designed to include insulating features (e.g., laminated glass, acoustical</p> | New Mitigation under Revised Project |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|----------------------------------|---|--|
| Construction Noise and Vibration | <p>insulation, and/or acoustical sealant) that would reduce interior noise levels to 45 dB L_{dn} or lower.</p> <p><i>Mitigation Measure M-NO-N5 (Cathedral Hill, Davies [near-term], St. Luke's Campuses)</i></p> <p>CPMC shall minimize the impacts of construction noise and vibration where feasible by implementing the measures listed below. These measures shall be required in each contract agreed to between CPMC and a contractor under the LRDP and shall apply to all projects and programs covered by this EIR.</p> <p>Construction equipment generating the highest noise and vibration levels (vibratory rollers) shall operate at the maximum distance feasible from sensitive receptors.</p> <p>Vibratory rollers shall operate during the daytime hours only to ensure that sleep is not disrupted at sensitive receptors near the construction area.</p> <p>A community liaison shall be available to respond to vibration complaints from nearby sensitive receptors. A community liaison shall be designated. Contact information for the community liaison shall be posted in a conspicuous location so that it is clearly visible to the nearby receptors most likely to be disturbed. The community liaison shall manage complaints resulting from construction vibration. Reoccurring disturbances shall be evaluated by a qualified acoustical consultant to ensure compliance with applicable standards. The community liaison shall contact nearby noise-sensitive</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>receptors and shall advise them of the construction schedule.</p> <p>To further address the nuisance impact of project construction, a construction vibration management plan shall be prepared by a qualified acoustical consultant retained by CPMC. The vibration management plan shall include but shall not be limited to the following tasks:</p> <ul style="list-style-type: none"> • A community liaison shall be designated. This person's contact information shall be posted in a location near the project site that it is clearly visible to the nearby receptors most likely to be disturbed. The community liaison shall manage complaints and concerns resulting from activities that cause vibration. The severity of the vibration concern shall be assessed by the community liaison and, if necessary, evaluated by a qualified noise and vibration control consultant. • The preexisting condition of all buildings within a 50-foot radius and historical buildings within the immediate vicinity of proposed construction activities shall be recorded in the form of a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins and shall be used to evaluate damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) before construction. All buildings damaged shall be repaired to their | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|----------------------------|---|--|
| | preexisting conditions. | |
| | <p>As part of the vibration management plan, vibration levels shall be monitored at the nearest interior location of adjacent uses, including Daniel Burnham Court, containing vibration sensitive equipment to monitor potential impacts from the project site. In the event that measured vibration levels exceed 65 VdB and disturb the operation of sensitive medical equipment, additional measures shall be implemented to the extent necessary and feasible, including restriction of construction activities, coordination with equipment operators, and/or installation of isolation equipment.</p> | |
| | AIR QUALITY | |
| Construction – Air Quality | <p><i>Mitigation Measure M-AQ-N1a (Cathedral Hill, Davies [near-term], St. Luke’s)</i></p> <p>The following mitigation measures shall be implemented during construction activities to avoid short-term significant impacts to air quality:</p> <p>BAAQMD Basic Control Measures</p> <ul style="list-style-type: none"> • Water all active construction areas at least twice daily. • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard. • Pave, apply water three times daily, or apply (nontoxic) soil stabilizer on all unpaved access roads, | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>parking areas, and staging areas at construction sites.</p> <ul style="list-style-type: none"> • Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites. • Sweep street daily (with water sweepers) if visible soil material is carried into adjacent public streets. <p>Optional Control Measures</p> <ul style="list-style-type: none"> • Install wheel washers for all exiting trucks, or wash off the tires or tracks of all trucks and equipment leaving the site. • Install wind breaks, or plant trees/vegetative wind breaks at windward sides of construction areas. • Suspend excavation and grading activity when winds (instantaneous gusts) exceed 20 mph. • Limit the area subject to excavation, grading, and other construction activities at any one time. <p>Additional Construction Mitigation Measures</p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered twice daily. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>street sweepers at least once per day. The use of dry power sweeping is prohibited.</p> <ul style="list-style-type: none"> • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measures, Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points. • All construction equipment shall be maintained and properly tuned in accordance with manufacturers' specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. <p>Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The air district's phone number shall also be visible to ensure compliance with applicable regulations.</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|----------------------------------|--|--|
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N1b (Cathedral Hill, Davies [near-term], St. Luke’s)</i></p> <p>To reduce exhaust emissions of ROG, NOX, PM10, and PM2.5 by construction equipment at the CPMC campuses, CPMC and its construction contractor shall implement the following BAAQMD-recommended control measures during construction in both the near term and the long term:</p> <ul style="list-style-type: none"> • Idling times shall be minimized, either by shutting equipment off when not in use or by reducing the maximum idling time to 2 minutes, to the extent feasible. Clear signage shall be provided for construction workers at all access points. <p>All construction equipment shall be maintained and properly tuned in accordance with the manufacturers’ specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition before operation.</p> | Same as for Previous Project. |
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N2 (Cathedral Hill Campus)</i></p> <p>To reduce risk associated with exhaust emissions of DPM by construction equipment during construction of the Cathedral Hill Campus and all other LRDP sites, CPMC and its construction contractor shall implement the following BAAQMD-recommended control measures during construction:</p> <ul style="list-style-type: none"> • Where sufficient electricity is available from the | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|----------------------------------|--|--|
| | <p>PG&E power grid, electric power shall be supplied by a temporary power connection to the grid, provided by PG&E. Where sufficient electricity to meet short-term electrical power needs for specialized equipment is not available from the PG&E power grid, non-diesel or diesel generators with Tier 4 engines (or equivalent) shall be used.</p> <ul style="list-style-type: none"> During any construction phase for near-term projects, at least half of each of the following equipment types shall be equipped with Level 3-verified diesel emission controls (VDECs): backhoes, concrete boom pumps, concrete trailer pumps, concrete placing booms, dozers, excavators, shoring drill rigs, soil mix drill rigs, and soldier pile rigs. If only one unit of the above equipment types is required, that unit shall have Level 3 VDECs retrofits. <p>For long-term projects, which are presumed to begin when Tier 4 equipment would be widely available, all diesel equipment of all types shall meet Tier 4 standards.</p> | |
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N8a (Cathedral Hill, Davies [near-term], St. Luke’s)</i></p> <p>This mitigation measure is identical to Mitigation Measure M-AQ-N1a, above.</p> | Same as for Previous Project. |
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N8b (Cathedral Hill, Davies</i></p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|----------------------------------|---|---|
| | <i>[near-term], St. Luke's)</i> | |
| | This mitigation measure is identical to Mitigation Measure M-AQ-N1b, above. | |
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N9 (Cathedral Hill, Davies [near-term], St. Luke's)</i></p> <p>CPMC shall implement Mitigation Measure M-AQ-N1a and Mitigation Measure M-AQ-N2, discussed above, to reduce emissions of criteria pollutants from construction equipment exhaust.</p> | Same as for Previous Project. |
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N10a (Cathedral Hill Campus)</i></p> <p>This mitigation measure is identical to Mitigation Measure M-AQ-N2, above.</p> | Same as for Previous Project. |
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N10b (Davies Campus [near-term])</i></p> <p>This mitigation measure is identical to Mitigation Measure M-AQ-N2, above.</p> | Same as for Previous Project. |
| Construction – Exhaust Emissions | <p><i>Mitigation Measure M-AQ-N10c (St. Luke's Campus)</i></p> <p>This mitigation measure is identical to Mitigation Measure M-AQ-N2, above.</p> | |
| | PUBLIC SERVICES | |
| Public Services | <i>Mitigation Measure M-PS-N2 (Cathedral Hill Campus)</i> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------|---|--|
| | This mitigation measure is identical to Mitigation Measure MM-TR-55 for Transportation and Circulation, above. | |
| | BIOLOGICAL RESOURCES | |
| Biologic Resources | <p><i>Mitigation Measure M-BI-N1 (Cathedral Hill)</i></p> <p>Before any demolition or construction activities occurring during the nesting season (January 15 through August 15) that involve removal of trees or shrubs, CPMC shall conduct a preconstruction survey for nesting birds at each of its medical campuses. The surveys shall be conducted by a qualified wildlife biologist no sooner than 14 days before the start of removal of trees and shrubs. The survey results shall remain valid for 21 days after the survey; therefore, if vegetation removal is not started within 21 days of the survey, another survey shall be required. The area surveyed shall include the construction site and the staging area for the tree or shrub removal. If no nests are present, tree removal and construction may commence. If active nests are located during the preconstruction bird nesting survey, CPMC shall contact DFG for guidance on obtaining and complying with Section 1801 of the California Fish and Game Code, which may include setting up and maintaining a line-of-sight buffer area around the active nest and prohibiting construction activities within the buffer; modifying construction activities; and/or removing or relocating active nests</p> | Same as for Previous Project. |
| Biologic Resources | <p><i>Mitigation Measure M-BI-N1 (Davies [near-term])</i></p> <p>This mitigation measure is identical to Mitigation Measure M-</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------------|---|---|
| Biologic Resources | <p>BI-N1 for the Cathedral Hill Campus, above.</p> <p><i>Mitigation Measure M-BI-N1 (St. Luke's with or without project variants))</i></p> <p>This mitigation measure is identical to Mitigation Measure M-BI-N1 for the Cathedral Hill Campus, above.</p> | Same as for Previous Project. |
| GEOLOGY AND SOILS | | |
| Geology and Soils | <p><i>Mitigation Measure M-GE-N4 (Cathedral Hill, Davies [near-term], St. Luke's)</i></p> <p>CPMC shall implement Mitigation Measure M-HY-N3, as described below</p> | Same as for Previous Project. |
| Geology and Soils | <p><i>Mitigation Measure M-GE-N6 (St. Luke's)</i></p> <p>The design level geotechnical report for the St. Luke's Campus MOB, the proposed utility route, and the sewer variant at the St. Luke's Campus shall include an excavation and dewatering program. The program shall include measures to monitor the improvements adjacent to construction for vertical movement. The monitoring shall include an optical survey and installation of inclinometers and groundwater observation wells. Groundwater levels outside the excavation shall be monitored through wells while dewatering is in progress. Should the magnitude of settlement or groundwater drawdown be deemed potentially damaging to surrounding improvements by a licensed engineer, the groundwater outside the excavation shall be recharged through wells or the dewatering program altered to reduce drawdown to an</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|-----------------------------|--|--|
| | acceptable level. | |
| | HYDROLOGY AND WATER QUALITY | |
| Hydrology and Water Quality | <p><i>Mitigation Measure M-HY-N2 (Cathedral Hill)</i></p> <p>To manage peak flow and discharge volume, CPMC shall prepare and implement a Stormwater Control Plan for each of the near-term projects under the LRDP, focusing on LID strategies and BMPs. In implementing the LRDP, CPMC shall comply with all policies and regulations adopted by the City, including SFPUC's Stormwater Design Guidelines, which require a 25% decrease in the rate and volume of stormwater runoff from the 2-year, 24-hour design storm. Therefore, the design-level drainage plans shall demonstrate that, at a minimum, there will be a 25% decrease in the rate and volume of stormwater runoff to the combined sewer for the 2-year, 24-hour storm as compared to existing conditions. This will be achieved by using LID stormwater BMPs which may include, but not limited to:</p> <ul style="list-style-type: none"> • green roofs, • cisterns, • bioswales, • bioretention basins, • planter boxes, • blue roofs, | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|-----------------------------|---|--|
| | <ul style="list-style-type: none"> • dry wells, and • other detention/storage facilities. <p>In addition, the final design team for the development project shall review and incorporate as many concepts as practicable from <i>Start at the Source: Design Guidance Manual for Stormwater Quality Protection</i>. SFPUC shall conduct project design review before the City's project approval occurs, to ensure that the impacts of the LRDP on the combined sewer system have been fully mitigated.</p> | |
| Hydrology and Water Quality | <p><i>Mitigation Measure M-HY-N2 (Davies [near-term])</i></p> <p>This mitigation measure is identical to Mitigation Measure M-HY-N2 for the Cathedral Hill Campus, above.</p> | Same as for Previous Project. |
| Hydrology and Water Quality | <p><i>Mitigation Measure M-HY-N2 (St. Luke's)</i></p> <p>This mitigation measure is identical to Mitigation Measure M-HY-N2 for the Cathedral Hill Campus, above.</p> | Same as for Previous Project. |
| Hydrology and Water Quality | <p><i>Mitigation Measure M-HY-N3 (Cathedral Hill, Davies [near-term], St. Luke's)</i></p> <p>In compliance with Article 4.1 of the San Francisco Public Works Code and the City's Construction Site Water Pollution Prevention Program, CPMC shall submit a site-specific SWPPP to SFPUC for approval before initiating construction activities in areas draining to the combined sewer system. SFPUC requires implementation of appropriate BMPs from the <i>California Stormwater Quality Association Stormwater</i></p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p><i>BMP Handbook—Construction.</i> In accordance with SFPUC's requirements, the SWPPP shall include the following elements:</p> <p><i>An erosion and sediment control plan.</i> The plan shall present a site map illustrating the BMPs that will be used to minimize on-site erosion and the sediment discharge into the combined sewer system, and shall provide a narrative description of those BMPs. Appropriate BMPs for the erosion and sediment control plan may include the following practices:</p> <ul style="list-style-type: none"> • Scheduling—Develop a schedule that includes sequencing of construction activities with the implementation of appropriate BMPs. Perform construction activities and control practices in accordance with the planned schedule. Schedule work to minimize soil-disturbing activities during the rainy season. Schedule major grading operations for the dry season when practical. Monitor the weather forecast for rainfall and adjust the schedule as appropriate. • Erosion control—Cover exposed excavated walls to reduce their exposure to rainfall. Preserve existing vegetation where feasible; apply mulch or hydroseed areas until permanent stabilization is established; and use soil binders, geotextiles and mats, earth dikes and drainage swales, velocity dissipation devices, slope drains, or polyacrylamide to protect soil from erosion. | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <ul style="list-style-type: none"> • Wind erosion—Apply water or other dust palliatives to prevent dust nuisance; prevent overwatering that can cause erosion. Alternatively, cover small stockpiles or areas that remain inactive for 7 or more days. • Sediment control—Install silt fences, sediment basins, sediment traps, check dams, fiber rolls, sand or gravel bag barriers, straw bale barriers, vegetated swales, approved chemical treatment, storm drain inlet protection, or other LID measures to minimize the discharge of sediment. Employ street sweeping to remove sediment from streets. Utilize treatment trains where feasible. Cover all stockpiled soil until it is needed. Cover all soil in haul trucks. • Tracking controls—Stabilize the construction site entrance to prevent tracking of sediment onto public roads by construction vehicles. Stabilize on-site vehicle transportation routes immediately after grading to prevent erosion and control dust. Install a tire wash area to remove sediment from tires and under carriages and contain all sediments in the wash area. • Litter control—Remove litter at least once daily from the construction site. Dispose of packing materials immediately in an enclosed container. • <i>Non-stormwater management BMPs.</i> These BMPs may include water conservation practices, dewatering practices | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>that minimize sediment discharges, and BMPs for all of the following:</p> <ul style="list-style-type: none"> • paving and grinding activities; • identification of illicit connections and illegal dumping; • irrigation and other planned or unplanned discharges of potable water; • vehicle and equipment cleaning, fueling, and maintenance; • concrete curing and finishing; • temporary batch plants; • implementation of shoreline improvements; and • work over water. <p>Discharges from dewatering activities shall comply with the requirements of SFPUC's Batch Wastewater Discharge Permit that regulate influent concentrations for various constituents.</p> <ul style="list-style-type: none"> • <i>Waste management BMPs.</i> These BMPs shall be implemented for: <ul style="list-style-type: none"> • material delivery, use, and storage; • stockpile management; • spill prevention and control; and | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <ul style="list-style-type: none"> management of solid and liquid waste, hazardous waste, contaminated soil, concrete waste, and septic/sanitary waste. <i>BMP inspection, maintenance, and repair requirements.</i> All BMPs shall be inspected on a regular basis to confirm proper installation and function. BMPs shall be inspected daily during storms, and BMPs that have failed shall be immediately repaired or replaced. Sufficient devices and materials (e.g., silt fence, coir rolls, erosion blankets) shall be provided throughout project construction to enable immediate corrective action for failed BMPs. Required BMP maintenance related to a storm event shall be completed within 48 hours of the storm event. The SWPPP shall include checklists that document when the inspections occurred, the results of the inspection, required corrective measures, and when corrective measures were implemented. <p>The SWPPP shall demonstrate how treatment control measures (e.g., silt fences, sediment basins, sediment traps, check dams, vegetated swales, infiltration trenches) targeting the project-specific contaminants including sediment, metals, oil and grease, trash and debris, and oxygen-demanding substances would be incorporated into the project. In addition, the SWPPP shall demonstrate that the project has the land area available to support the proposed BMP facilities sized for the required water quality design storm.</p> <p>Construction personnel shall receive training on the SWPPP and implementation of BMPs.</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--|--|--|
| HAZARDS AND HAZARDOUS MATERIALS | | |
| Hazards and Hazardous Materials | <p><i>Mitigation Measure M-HZ-N1a (Cathedral Hill, Davies [near-term], St. Luke's)</i></p> <p>Step 1: Preparation of a Site Mitigation Plan</p> <p>Before the issuance of site, building, or other permits from the City for development activities involving subsurface disturbance, CPMC shall submit the previously prepared environmental contingency plans to SFDPH for review and approval as site mitigation plans (SMPs) for the Cathedral Hill, Davies, and St. Luke's Campuses. The SMPs shall include the following measures and procedures:</p> <ul style="list-style-type: none"> • All soil shall be sampled for a suite of common chemicals required by landfills and redevelopment sites accepting imported fill from other sites to provide a chemical profile and identify the soil worker safety and disposal classification. Sample analytical results shall be submitted to SFDPH for review. • Fill shall be sampled and analyzed before excavation to allow excavation, loading, and transportation off-site without stockpiling, which would minimize soil handling. • If soil encountered during excavation exhibits the presence of liquid hydrocarbons (such as oil), strong odors, or staining suggesting the presence of hazardous materials, work shall be halted, the area | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>shall be covered in plastic sheeting, stockpiles shall be segregated and covered, and samples shall be collected from the base and walls of the excavation. Once sampling results have returned, the soil shall be treated in accordance with the above outlined procedures.</p> <ul style="list-style-type: none"> • If groundwater is present and in a volume requiring dewatering, a dewatering contractor shall be retained to design and install a dewatering system to remove and discharge the water to the sanitary sewer system during excavation and construction. The dewatering contractor shall obtain a batch groundwater discharge permit from SFPUC. A groundwater sample shall be collected and analyzed for parameters established by SFPUC before any discharge of groundwater into the sewer system. If required by SFPUC, additional groundwater samples shall be collected monthly from the discharged water for parameters stipulated by SFPUC. If analytes in the groundwater exceed the established SFPUC discharge limits, the groundwater shall be stored in containers and properly treated before discharge. The treatment system, if needed, shall be designed based on the chemicals present in the groundwater. • A licensed tank removal contractor shall be retained to properly remove and dispose of known tanks in accordance with all current regulations and the site-specific and tank-specific procedures outlined in the ECPs for each campus. All the necessary permits | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>from SFFD and SFDPH shall be obtained, and all notifications to BAAQMD shall be made before the tank is removed. The health and safety plan shall be followed, and air monitoring shall be performed during all tank removal activities. If soil staining, odor, and/or elevated organic vapor analyzer readings are observed during tank removal, the affected soil shall be placed on and covered with plastic tarpaulins, separate from any unaffected soil removed from above the tank. All soil sampling and analysis for tank closure shall be performed in accordance with the Tri-Regional Board Staff Recommendations for Preliminary Evaluation and Investigation of Underground Tank Sites, dated August 10, 1990, and any additional SFFD and SFDPH requirements.</p> | |
| | <p>Any additional measures that the SFDPH determines are required beyond those already identified in the ECPs shall also be incorporated into the SPMs and implemented by CPMC. A copy of the SMPs shall be submitted to the Planning Department to become part of the case file.</p> | |
| | <p>Step 2: Handling, Hauling, and Disposal of Contaminated Soils</p> | |
| | <p>(a) <u>Specific work practices</u>: If, based on the results of the soil tests conducted, the SFDPH determines that the soils on the campuses are contaminated at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>during excavation and other construction activities on the campuses (detected through soil odor, color, and texture) and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by federal, state, and local regulations) when such soils are encountered on the campuses. If excavated materials contain over one percent friable asbestos, they shall be treated as hazardous waste, and shall be transported and disposed of in accordance with applicable federal and state regulations.</p> <p>(b) <u>Dust suppression</u>: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after construction work hours.</p> <p>(c) <u>Surface water runoff control</u>: Where soils are stockpiled, plastic sheeting shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather and from air.</p> <p>(d) <u>Soils replacement</u>: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where contaminated soils have been excavated and removed, up to construction grade.</p> <p>(e) <u>Hauling and disposal</u>: Contaminated soils shall be hauled off the project site by waste hauling trucks</p> | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------------------------------|--|--|
| Hazards and Hazardous Materials | <p>appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California. Nonhazardous soil shall be sent to other sites to be used as import fill where accepted or shall be transported and disposed of at a licensed Class II or Class III landfill, as appropriate. Soil classified as California hazardous waste shall be transported either out of state to an appropriate licensed facility or to a Class I facility in California. Soil classified as RCRA hazardous waste shall be transported to a Class I landfill facility in California.</p> <p>Step 3: Preparation of Closure/Certification Report</p> <p>After construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to the SFDPH for review and approval. The closure/certification report shall include the mitigation measures in the SMPs for handling and removing contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.</p> <p><i>Mitigation Measure M-HZ-N1b Cathedral Hill, Davies [near-term], St. Luke's): Preparation of Unknown Contingency Plan</i></p> <p>Before the issuance of site, building, or other permit from the</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>city for development activities involving subsurface disturbance, CPMC shall prepare and submit to SFDPH for approval a contingency plan to address unknown contaminants encountered during development activities. This plan, the conditions of which shall be incorporated into the first permit and any applicable permit thereafter, shall establish and describe procedures for implementing a contingency plan, including appropriate notification and site control procedures, in the event unanticipated subsurface hazards or hazardous material releases are discovered during construction. Control procedures shall include, but shall not be limited to, further investigation and, if necessary, remediation of such hazards or releases, including off-campus removal and disposal, containment, or treatment. In accordance with the procedures outlined in the ECPs, measures following the discovery of previously unidentified USTs or other subsurface facilities shall include, but shall not be limited to, the following:</p> <ul style="list-style-type: none"> • Work at the location of the discovered tank shall be halted, the exposed portion of the tank shall be covered with plastic sheeting, and the area shall be secured while the tank and surrounding soil (if unvaulted) are evaluated. The site superintendent shall be notified, and an appropriate environmental professional shall be brought on-site to evaluate the nature, use, and extent of the tank. The contractor's health and safety plan shall be reviewed and revised, if necessary, and appropriately trained personnel (e.g., HAZWOPER trained) shall be mobilized to | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>address the tank. If the tank is ruptured during discovery, the contractor, at the direction of the environmental professional, shall attempt to contain any contents that have been released to the soil. The top of the tank shall be uncovered to locate an access port, and the tank shall be opened to evaluate the contents. The tank shall be sounded to evaluate its size and the presence and amount of tank contents remaining (if any). A sample of the contents shall be collected, if possible. On determining the nature and use of the tank, the environmental professional and/or contractor shall notify BAAQMD, SFDPH, and SFFD. During all work performed in response to the presence of the tank, the air in the working area shall be monitored for volatile organic compounds, and the tank shall remain covered with the tarpaulin whenever access is not necessary. Tanks discovered in vaults in basements shall be removed after the building above has been demolished. All tanks shall be removed in accordance with the procedures described in the ECPs for the campuses.</p> <ul style="list-style-type: none"> • If other subsurface facilities containing or associated with hazardous materials, such as oil pits, sumps associated with clarification or neutralization of liquid waste, piping associated with underground tanks, piping that may be composed of asbestos-containing material, and building drainage systems (e.g., waste lines, sewer laterals) are encountered during demolition and excavation, work in the area | |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------------------------------|--|--|
| Hazards and Hazardous Materials | <p>shall be halted and the facility be covered in plastic sheeting. If a sump and/or vaults are identified during excavation activities, the facility shall be managed in the same manner as required for underground tanks. If drainage lines or piping are encountered, they shall be observed and evaluated to determine use and composition. If piping contains liquid wastes, these wastes shall be contained as completely as possible, transferred to secure containers, sampled, and subsequently disposed of off-site. If piping is composed of asbestos-containing materials, the material shall be removed, bagged, and disposed of appropriately. If piping is not composed of asbestos-containing materials, it shall be removed and subsequently sent off-site as scrap. Soil adjacent to and in the vicinity of the discovered facilities shall be examined, evaluated, and managed as described for other soils at the campuses.</p> <p>In the event unanticipated subsurface hazards or hazardous material releases are discovered during construction, the requirements of this unknown contingency plan shall be followed. The contingency plan shall be amended, as necessary, in the event new information becomes available that could affect the implementation of the plan.</p> <p><i>Mitigation Measure M-HZ-N4a (Cathedral Hill)</i></p> <p>This mitigation measure is identical to M-HZ-N1a for near-term impacts and requires the preparation of site mitigation plan (SMPs) for the near-term projects at the Cathedral Hill</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------------------------------|--|--|
| | Campus. | |
| Hazards and Hazardous Materials | <p><i>Mitigation Measure M-HZ-N4b (Cathedral Hill)</i></p> <p>This mitigation measure is identical to M-HZ-N1b for near-term impacts and requires the preparation of unknown contingency plans for the near-term projects at the Cathedral Hill Campus.</p> | Same as for Previous Project. |
| Hazards and Hazardous Materials | <p><i>Mitigation Measure M-HZ-N4c (Davies [near-term])</i></p> <p>This mitigation measure is identical to M-HZ-N1a for near-term impacts and requires the preparation of site mitigation plan (SMPs) for the near-term projects at the Davies Campus</p> | Same as for Previous Project. |
| Hazards and Hazardous Materials | <p><i>Mitigation Measure M-HZ-N4d (Davies [near-term])</i></p> <p>This mitigation measure is identical to M-HZ-N1b for near-term impacts and requires the preparation of unknown contingency plans for the near-term projects at the Davies Campus.</p> | Same as for Previous Project. |
| Hazards and Hazardous Materials | <p><i>Mitigation Measure M-HZ-N4e (St. Luke's)</i></p> <p>This mitigation measure is identical to M-HZ-N1a for near-term impacts and requires the preparation of site mitigation plan (SMPs) for the near-term projects at the St. Luke's Campus.</p> | Same as for Previous Project. |
| Hazards and Hazardous Materials | <p><i>Mitigation Measure M-HZ-N4f (St. Luke's)</i></p> <p>This mitigation measure is identical to M-HZ-N1b for near-term impacts and requires the preparation of unknown</p> | Same as for Previous Project. |

Table I
Comparison of Impact Levels and Mitigation Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|---|
| | contingency plans for the near-term projects at the St. Luke's Campus. | |

Table II
Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------------|---|--|
| | IMPROVEMENT MEASURES AGREED TO BY PROJECT SPONSOR FOR PREVIOUS PROJECT | |
| | TRANSPORTATION & CIRCULATION | |
| Parking Queue | I-TR-5 (Cathedral Hill): Off-Street Parking Queue Abatement | Same as for Previous Project. |
| | <p>It shall be the responsibility of the owner/operator of any off-street parking facility primarily serving a non-residential use, as determined by the Planning Director, with more than 20 parking spaces (excluding loading and car-share spaces) to ensure that recurring vehicle queues do not occur on the public right-of-way. A vehicle queue is defined as one or more vehicles blocking any portion of any public street, alley or sidewalk for a consecutive period of three minutes or longer on a daily or weekly basis.</p> <p>If a recurring queue occurs, the owner/operator of the parking facility shall employ abatement methods as needed to abate the queue. Suggested abatement methods include but are not limited to the following: redesign of facility layout to improve vehicle circulation and/or on-site queue capacity; employment of parking attendants; installation of LOT FULL signs with active management by parking attendants; use of valet parking or other space-efficient parking techniques; use of off-site parking facilities or shared parking with nearby uses; use of parking occupancy sensors and signage directing drivers to available spaces; travel demand management strategies such as additional bicycle parking, customer shuttles or delivery services; and/or parking demand management strategies such</p> | |

Table II
Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--------------------|---|--|
| Pedestrian Impacts | <p>as parking time limits, paid parking or validated parking.</p> <p>If the Planning Director, or his or her designee, suspects that a recurring queue is present, the Department shall notify the property owner in writing. Upon request, the owner/operator shall hire a qualified transportation consultant to evaluate the conditions at the site for no less than seven days. The consultant shall prepare a monitoring report to be submitted to the Department for review. If the Department determines that a recurring queue does exist, the facility owner/operator shall have 90 days from the date of the written determination to abate the queue.</p> <p><i>I-TR-40 (Cathedral Hill): Pedestrian Improvements</i></p> <p>As an improvement measure to facilitate pedestrian movements, SFMTA should install pedestrian countdown signals for all directions at the signalized intersections of Franklin/Sutter, Franklin/Post, Franklin/Geary, Van Ness/Sutter, Van Ness/Post, and Polk/Post.</p> <p>In addition to the above, although the project would have less-than-significant impacts on the pedestrian and bicycle environment, the project sponsor has agreed as part of the development agreement negotiations to provide certain funding for City agencies, including Planning, SFMTA and DPW, to study and possibly implement additional streetscape, pedestrian, and related improvements in the vicinity of the proposed Cathedral Hill Campus that would improve the less-than-significant impacts to the pedestrian and bicycle environment. Improvements under consideration by the City</p> | Same as for Previous Project. |

Table II
Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|----------------------------------|---|--|
| Pedestrian and Bicyclist Impacts | <p>would be consistent with those identified in the Little Saigon Report as well as other potential sidewalk improvements such as bulb-outs, lighting and pedestrian signal modifications, advance stop bars, right turn vehicle turn restrictions and other safety facilities, at such intersections as Polk Street/Ellis Street, Larkin Street /Geary Street, Larkin Street /Grove Street, Larkin Street /9th Street, Hyde Street /O'Farrell Street, and Leavenworth Street/Geary Street. The City would have sole authority to determine whether to proceed with the Tenderloin and Little Saigon neighborhood area improvements and to issue required permits and authorizations. The City would also retain the discretion to modify or select feasible alternatives to the improvements to avoid any identified impacts or concerns that arise in connection with their further review, including any required environmental review under CEQA.</p> <p><i>I-TR-87 (St. Luke's): Provide Pedestrian/Bicycle Improvements</i></p> <p>CPMC should implement improvement measures to minimize conflicts between vehicles, bicyclists, and pedestrians at the Cesar Chavez Street passenger loading/unloading zone, including: warning signs and colored bicycle lane treatment to alert drivers to the presence of bicyclists and bicycle lanes, and management of the passenger loading/unloading zone during peak periods of activity (e.g., between 10 a.m. and 4 p.m.).</p> <p>As an improvement measure to minimize conflicts between vehicles exiting the proposed garages and pedestrians and</p> | Same as for Previous Project. |

Table II
Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|--|---|--|
| Construction Equipment – DPM Exhaust Emissions (Davies Campus) | <p>bicyclists on Valencia Street and Cesar Chavez Street, CPMC should install flashing lights and audible signals to provide indications when a vehicle is exiting the garage.</p> <p><i>I-TR-88 (St. Luke’s): Install Pedestrian Crosswalks</i></p> <p>As an improvement measure to facilitate pedestrian movements, SFMTA shall install pedestrian crosswalks at the unsignalized intersection of San Jose/27th Street.</p> | |
| | AIR QUALITY | |
| | <p><i>I-AQ-N2 (Davies [near-term], St. Luke’s): Install Accelerated Emission Control Device on Construction Equipment</i></p> <p>This improvement measure is identical to Mitigation Measure M-AQ-N2 for the Cathedral Hill Campus, which provides:</p> <p>To reduce risk associated with exhaust emissions of DPM by construction equipment during construction of the Cathedral Hill Campus and all other LRDP sites, CPMC and its construction contractor shall implement the following BAAQMD-recommended control measures during construction:</p> <p style="padding-left: 40px;">Where sufficient electricity is available from the PG&E power grid, electric power shall be supplied by a temporary power connection to the grid, provided by PG&E. Where sufficient electricity to</p> | Same as for Previous Project. |

Table II
Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|--|--|
| | <p>meet short-term electrical power needs for specialized equipment is not available from the PG&E power grid, non-diesel or diesel generators with Tier 4 engines (or equivalent) shall be used.</p> <p>During any construction phase for near-term projects, at least half of each of the following equipment types shall be equipped with Level 3-verified diesel emission controls (VDECs): backhoes, concrete boom pumps, concrete trailer pumps, concrete placing booms, dozers, excavators, shoring drill rigs, soil mix drill rigs, and soldier pile rigs. If only one unit of the above equipment types is required, that unit shall have Level 3 VDECs retrofits.</p> <p>For long-term projects, which are presumed to being when Tier 4 equipment would be widely available, all diesel equipment of all types shall meet Tier 4 standards.</p> | |

BIOLOGICAL RESOURCES

Tree Protection (St. Luke's Campus)

I-BI-N2 (St. Luke's [with or without variants]):

Same as for Previous Project.

As an improvement measure, CPMC would prepare a tree protection plan to be submitted to DPW as part of the construction plans for the St. Luke's Campus. The landmark tree located directly east of the 1957 Building, fronting Valencia Street, is not proposed for removal; therefore, impacts on the landmark tree would be less-than-significant. However, a tree protection plan would be implemented to

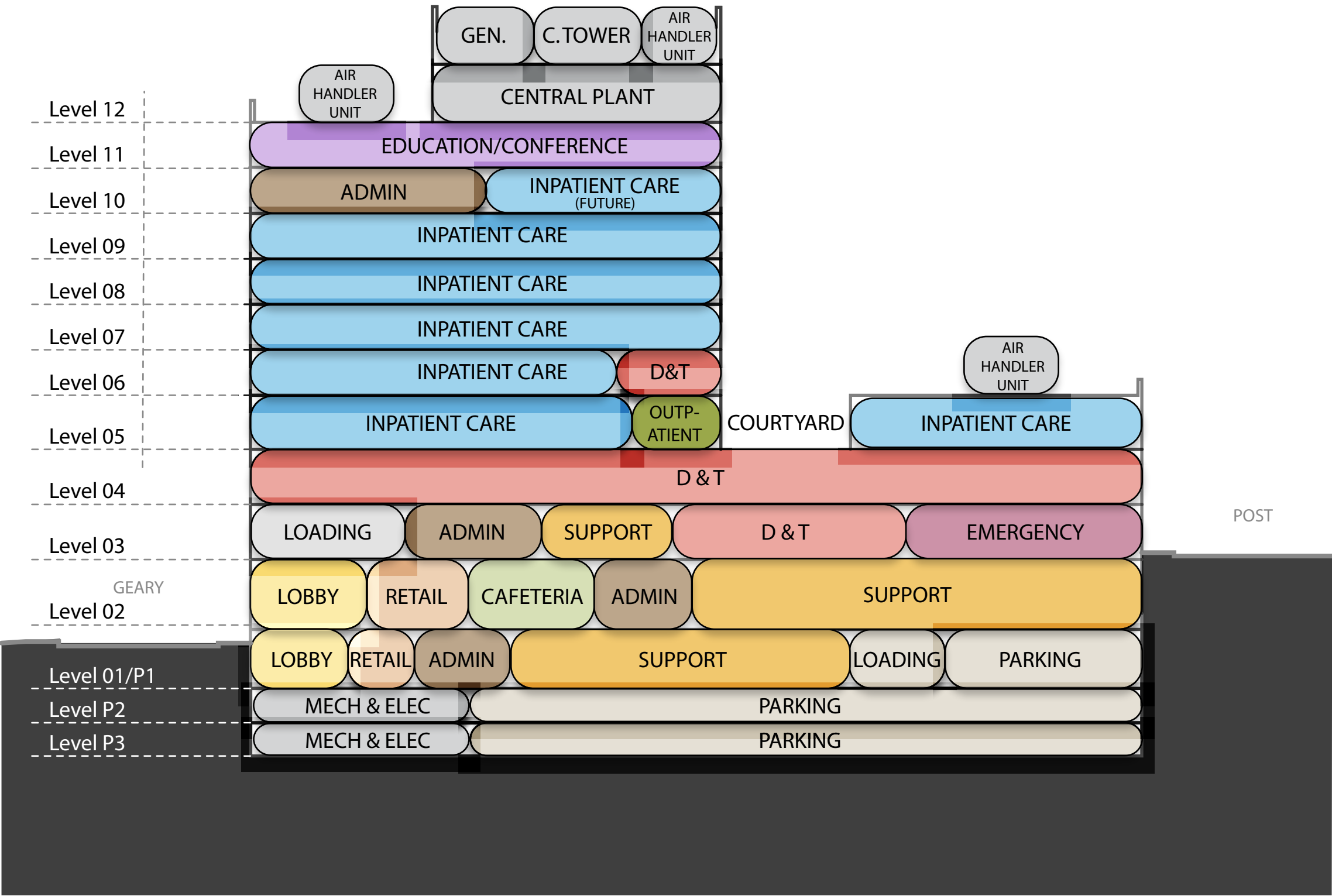
Table II
Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project

| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---------|---|--|
| | <p>further protect the existing landmark tree from potential adverse construction impacts that could affect the health of the tree. Through consultation of a certified arborist, CPMC would implement a Tree Protection Zone (TPZ) around the landmark tree during demolition and construction activities. The TPZ would be determined by the certified arborist at the time the work is done. During the various construction phases, the TPZ should follow all of the measures outlined below:</p> <ul style="list-style-type: none"> • Install and maintain construction fencing to prevent entry to the TPZ. • Install wood chip mulch over all exposed soil areas within the TPZ. • Prohibit placement of any construction vehicle within the TPZ. • Do not store materials, excavation tailing, or debris within the TPZ, unless placed on a thick plywood root buffer. • If trenching or grading takes place within the TPZ, ensure that the project arborist will review the proposed work and retain the arborist on-site during that aspect of the work. <p>The arborist report and tree protection plan would be reviewed by DPW's Bureau of Urban Forestry to verify that the specified protections would be adequate to protect the landmark tree. The Bureau of Urban Forestry would also monitor the project site during demolition and construction</p> | |

Table II
Comparison of Impact Levels and Improvement Measures for Previous Project and Revised Project

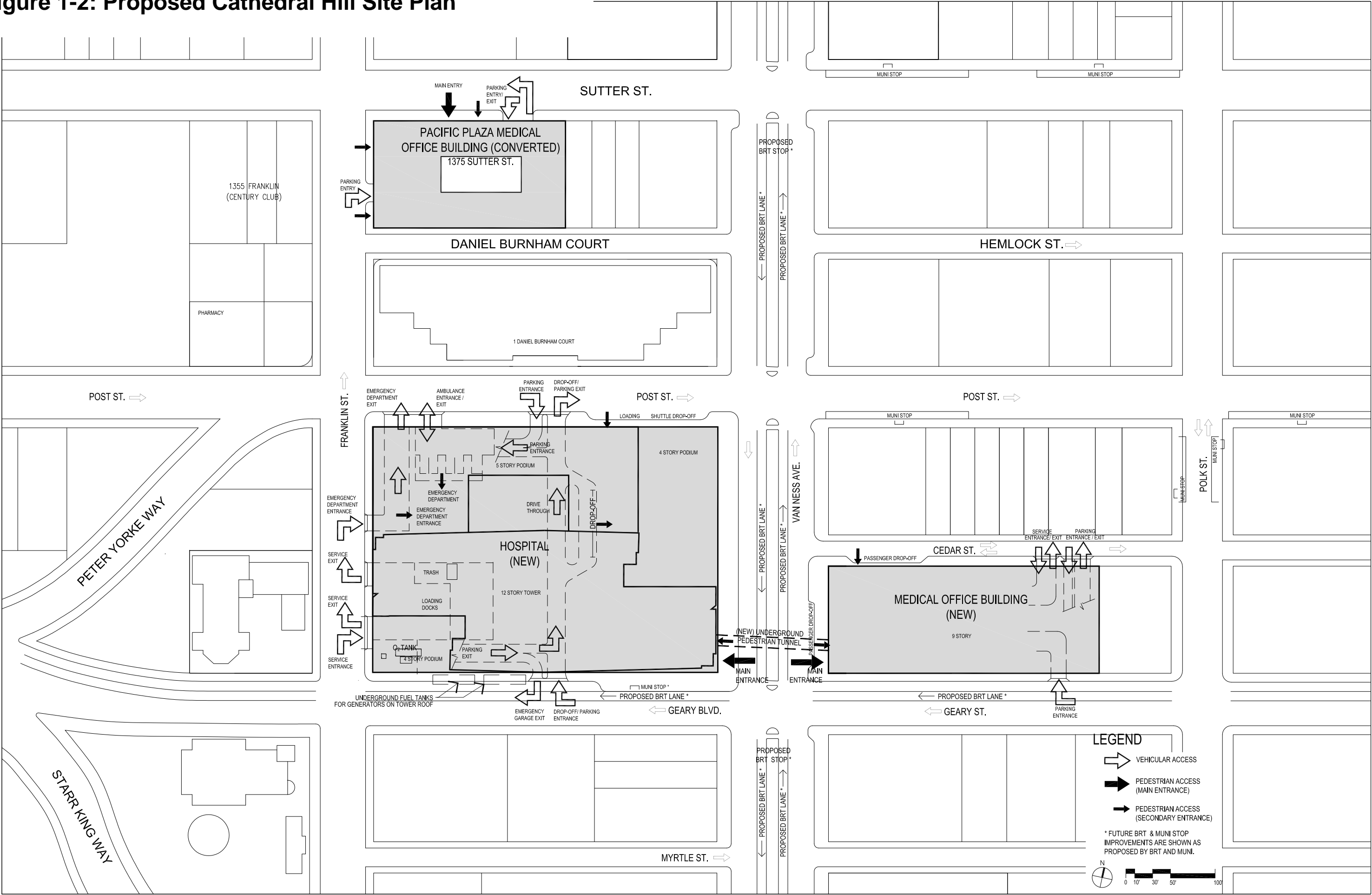
| Impacts | Previous Project Level of Significance - Impacts and Mitigation / Improvement Measure | Revised Project Level of Significance - Impacts and Mitigation / Improvement Measure |
|---|---|--|
| | activities to ensure that the protection measures outlined in the tree protection plan are being implemented and are adequate, and that the landmark tree would not be damaged. | |
| | GEOLOGY AND SOILS | |
| Geology and Soils (Cathedral Hill Campus) | <p><i>I-GE-N6 (Cathedral Hill):</i></p> <p>An excavation monitoring program shall be developed for construction of the Cathedral Hill Campus MOB. The program shall include requirements for the installation and regular monitoring of survey points and inclinometers should dewatering be required. Excavation and dewatering activities shall be shut down should unacceptable movement of overlying soil occur.</p> | Same as for Previous Project. |
| | HAZARDS AND HAZARDOUS MATERIALS | |
| Hazardous Materials | <p><i>I-HZ-N1// I-HZ-N3(Cathedral Hill Davies [near-term], St. Luke's [with or without variants]):</i></p> <p>CPMC shall ensure that the project contractors remove and properly dispose of PCB- and mercury-containing equipment prior to the start of project-related demolition or renovation.</p> | Same as for Previous Project. |

Figure 1-1: Hospital at Cathedral Hill Campus Stacking Diagram



* NOTE : STACKING DIAGRAM IS FOR ILLUSTRATIVE PURPOSES ONLY AND IS NOT TO SCALE

Figure 1-2: Proposed Cathedral Hill Site Plan



SITE PLAN

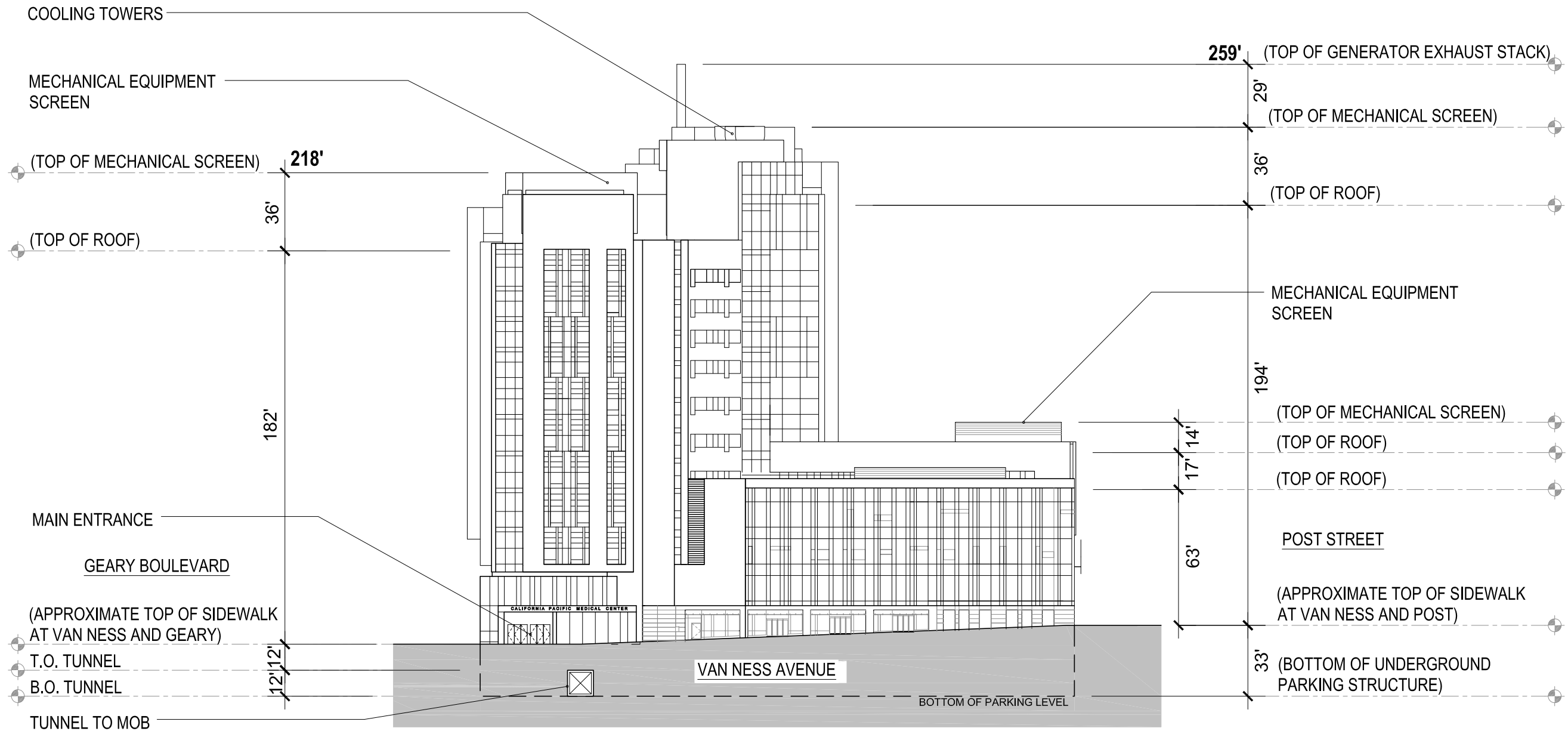
CATHEDRAL HILL HOSPITAL

SMITHGROUPJJR

CPMC LRDP Revised Project

CPMC LONG RANGE DEVELOPMENT PLAN

Figure 1-3: Cathedral Hill East Elevation



NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

Source: SmithGroup
APPROXIMATE SCALE
EAST ELEVATION
0' 10' 20' 50'

Figure 1-4: Cathedral Hill North Elevation



NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

Source: SmithGroup
APPROXIMATE SCALE

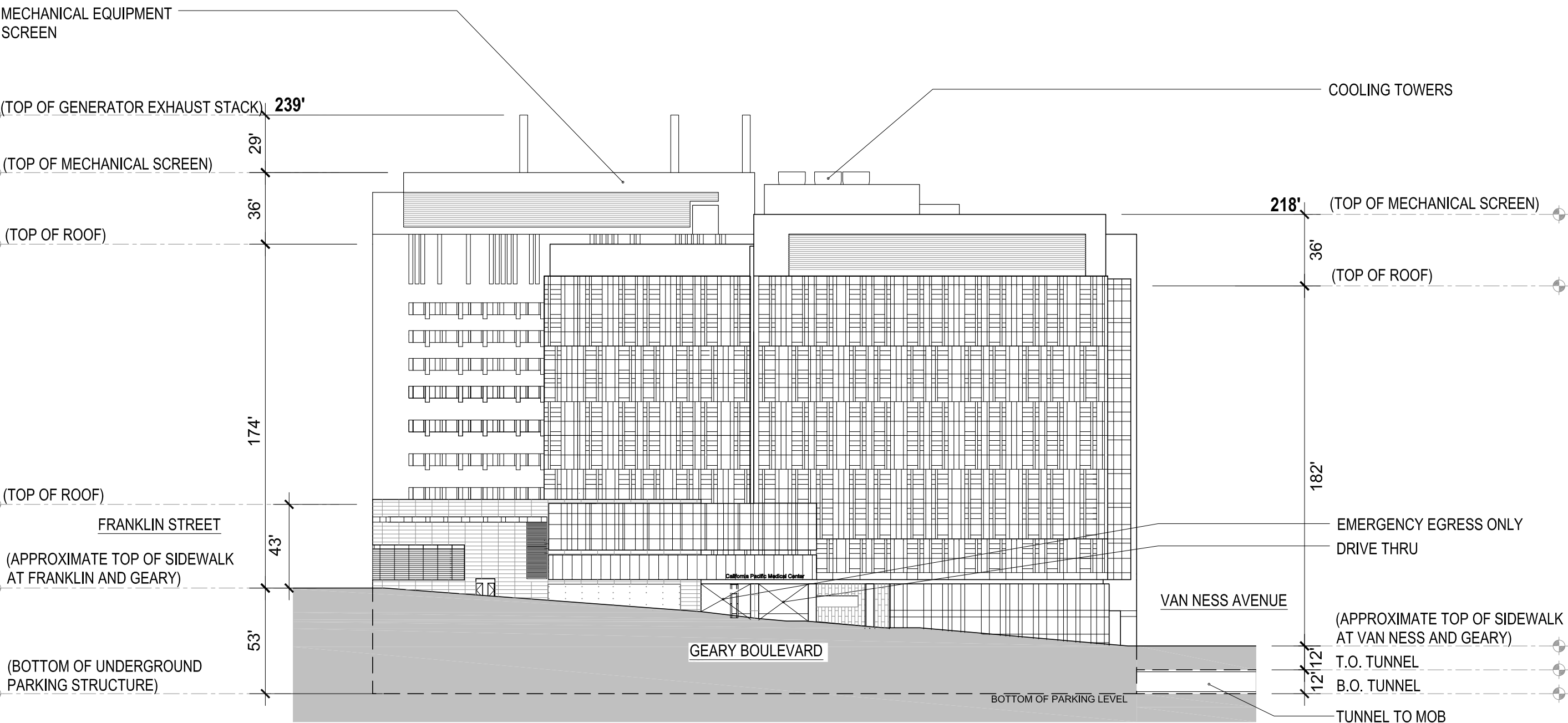
NORTH ELEVATION
0' 10' 20' 50'

ELEVATION

CATHEDRAL HILL HOSPITAL
SMITHGROUPJJR

CPMC LRDP Revised Project
CPMC LONG RANGE DEVELOPMENT PLAN

Figure 1-5: Cathedral Hill South Elevation

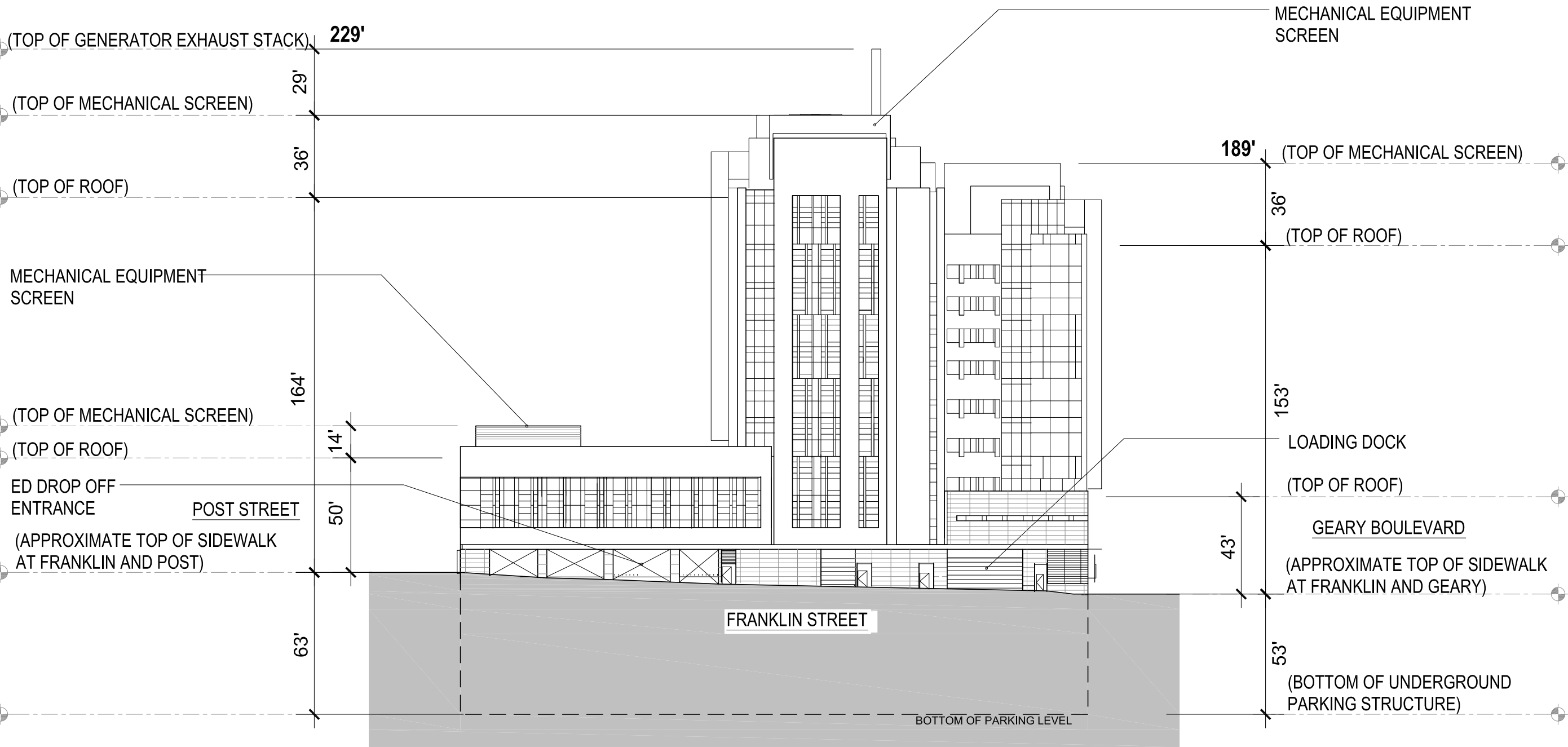


NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

Source: SmithGroup
APPROXIMATE SCALE



Figure 1-6: Cathedral Hill West Elevation



NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

Source: SmithGroup
APPROXIMATE SCALE
WEST ELEVATION
0' 10' 20' 50'

ELEVATION

CATHEDRAL HILL HOSPITAL
SMITHGROUPJJR

CPMC LRDP Revised Project
CPMC LONG RANGE DEVELOPMENT PLAN

Figure 1-7: Cathedral Hill Stacking Diagram Section A-A

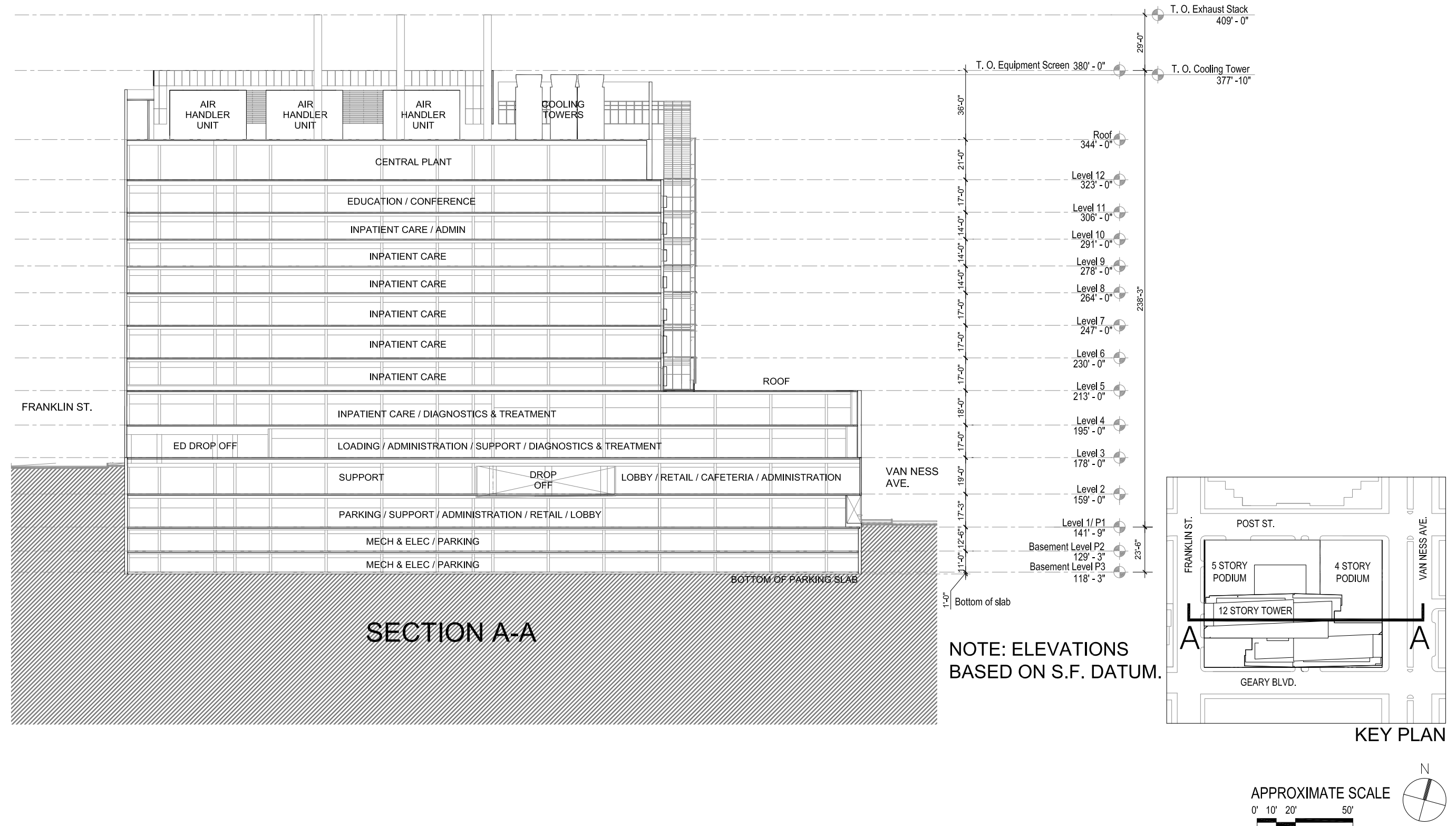
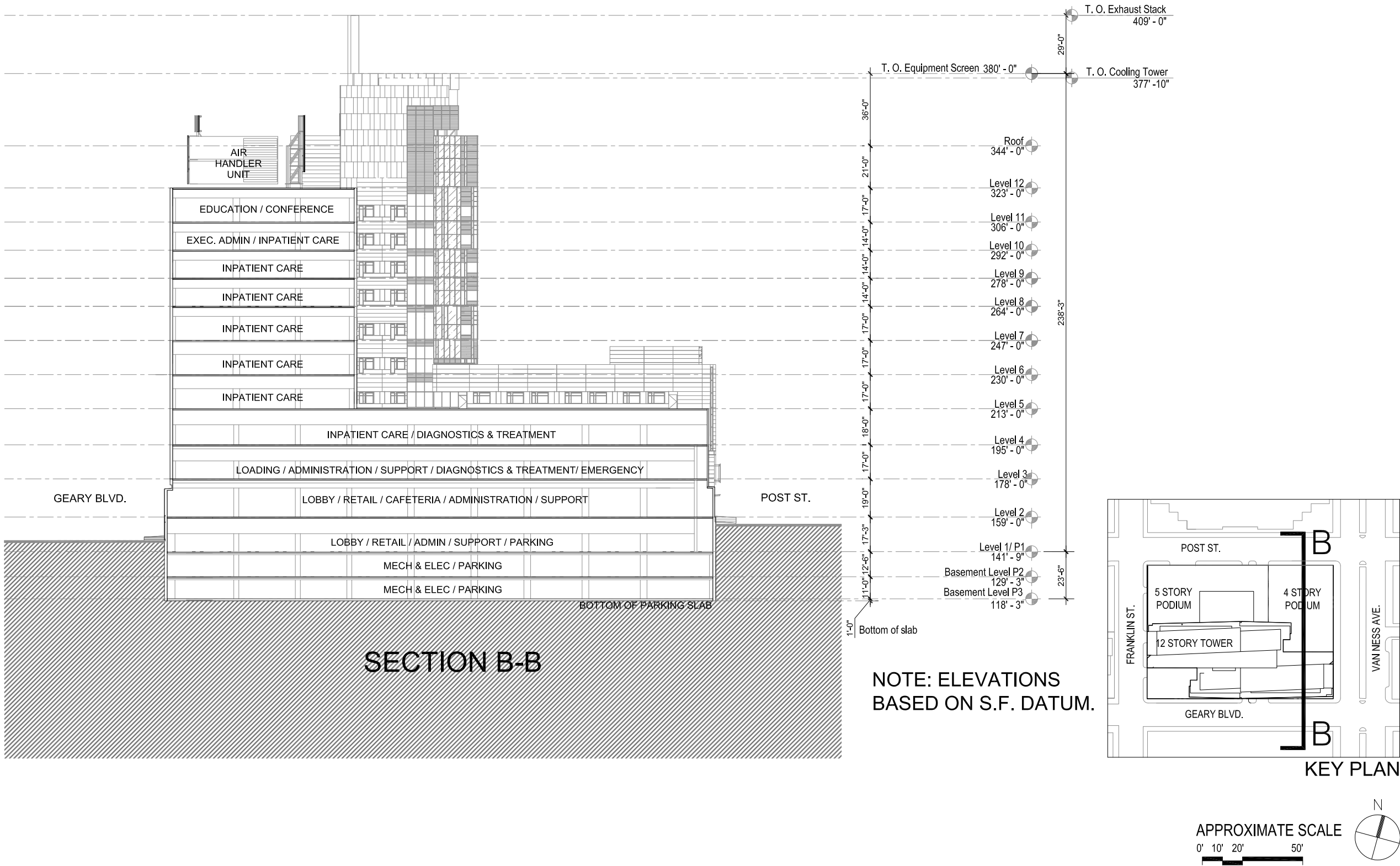


Figure 1-8: Cathedral Hill Stacking Diagram Section B-B



BUILDING SECTION

CATHEDRAL HILL HOSPITAL

SMITHGROUPJJR

CPMC LRDP Revised Project

CPMC LONG RANGE DEVELOPMENT PLAN

Figure 1-9: Cathedral Hill Stacking Diagram Section C-C

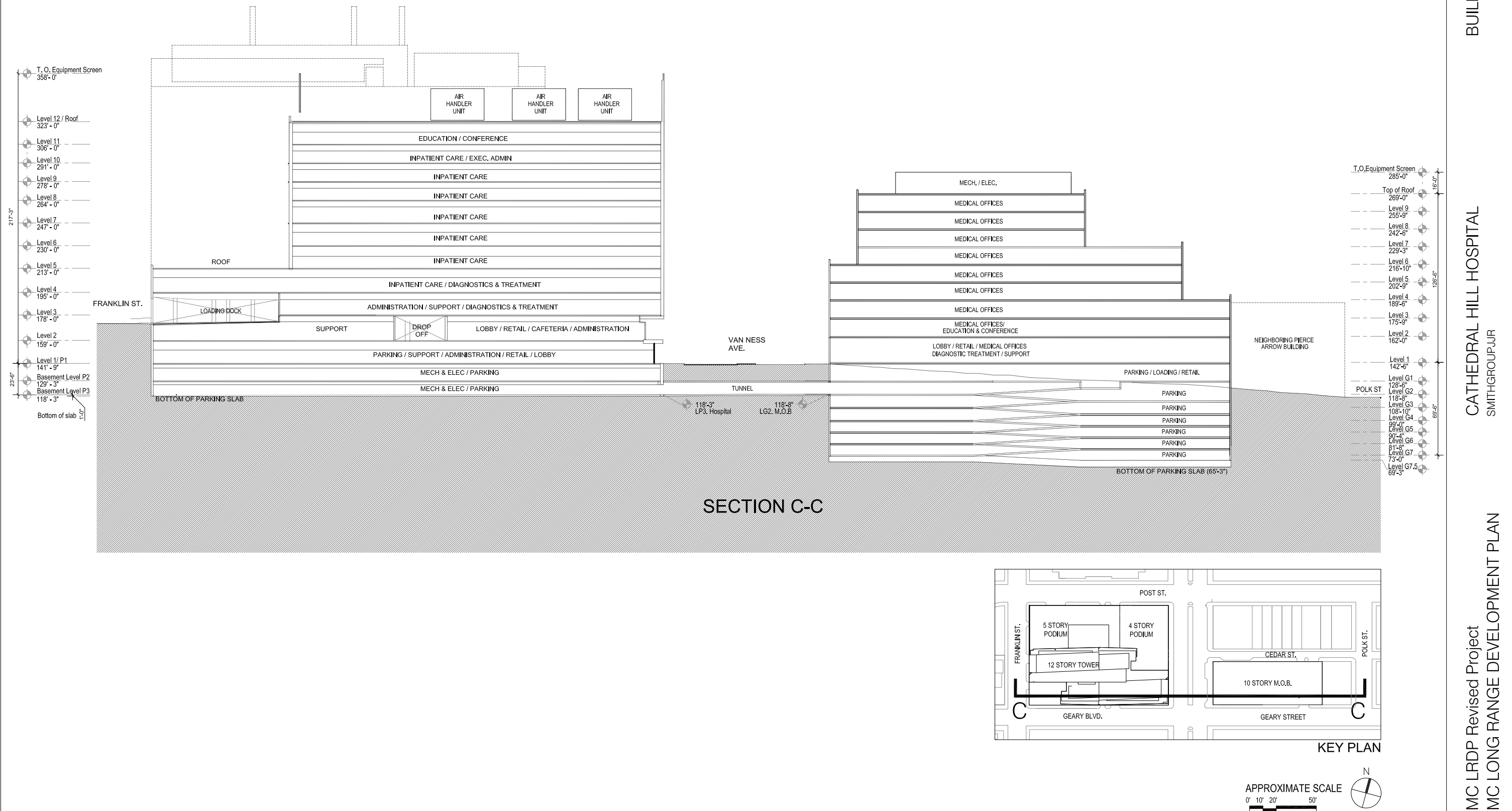
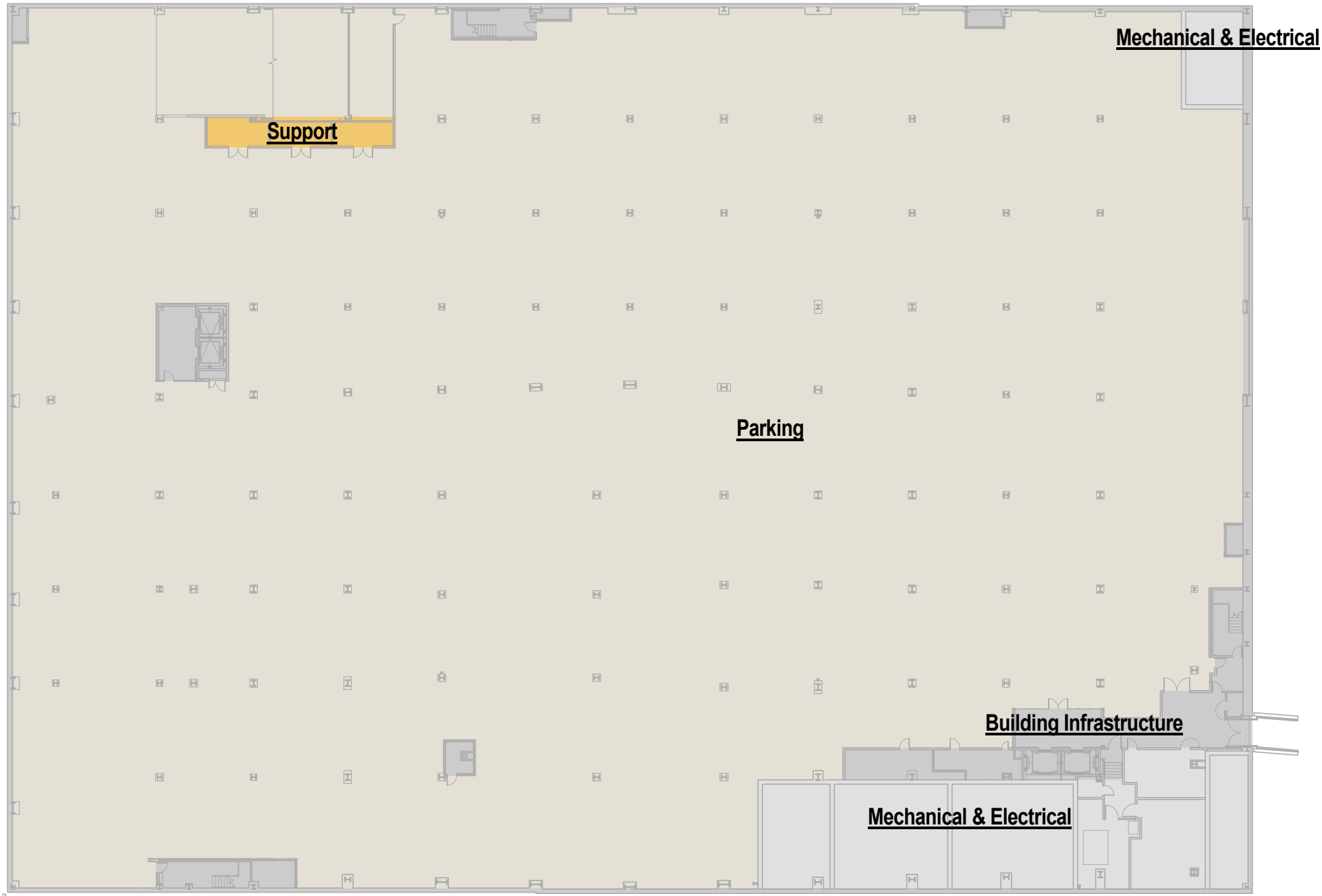


Figure 1-10: Cathedral Hill Hospital - Level P3



Cathedral Hill Hospital - Level P3

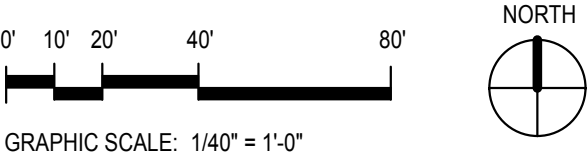
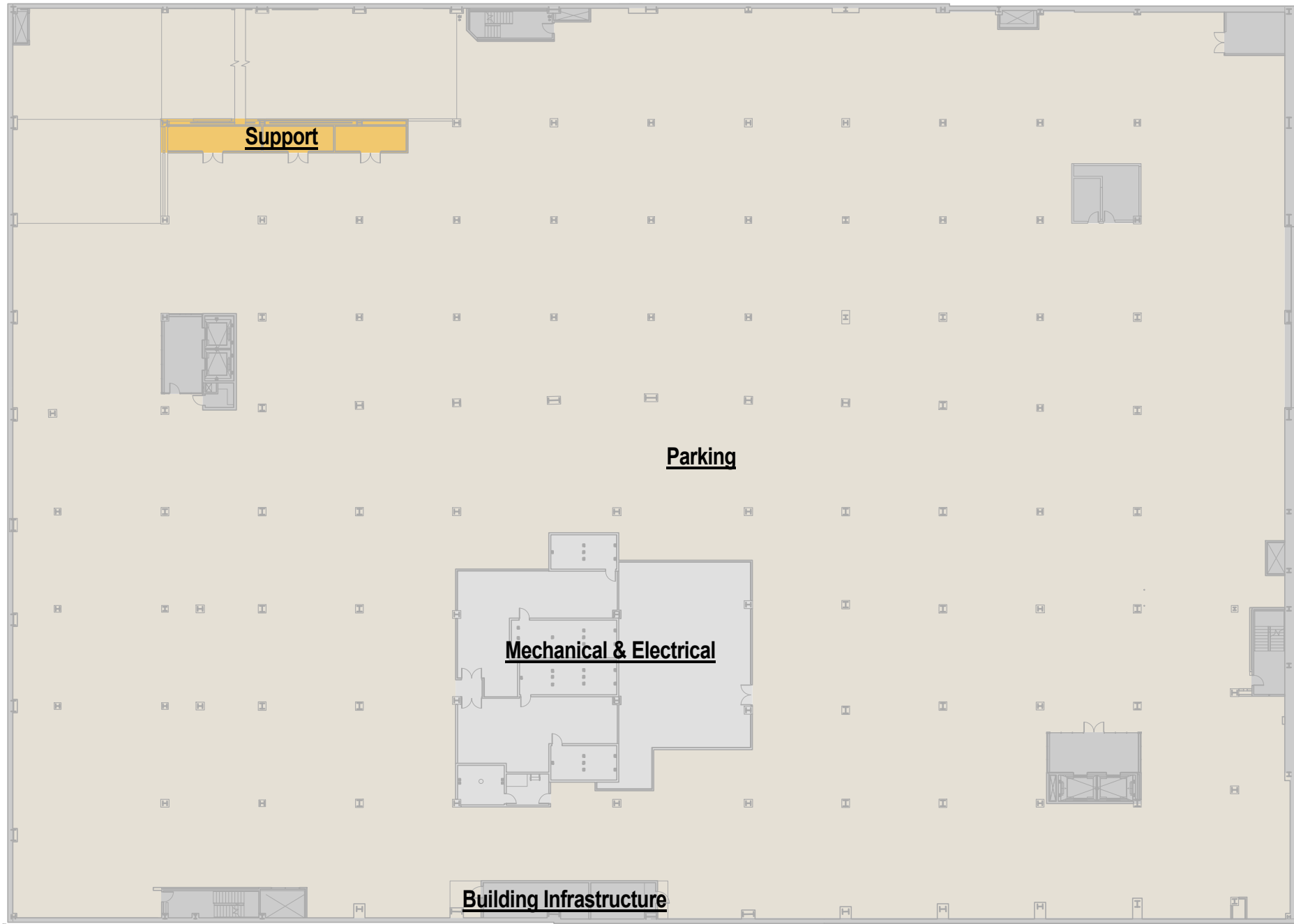


Figure 1-11: Cathedral Hill Hospital - Level P2



Cathedral Hill Hospital - Level P2

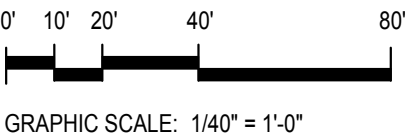
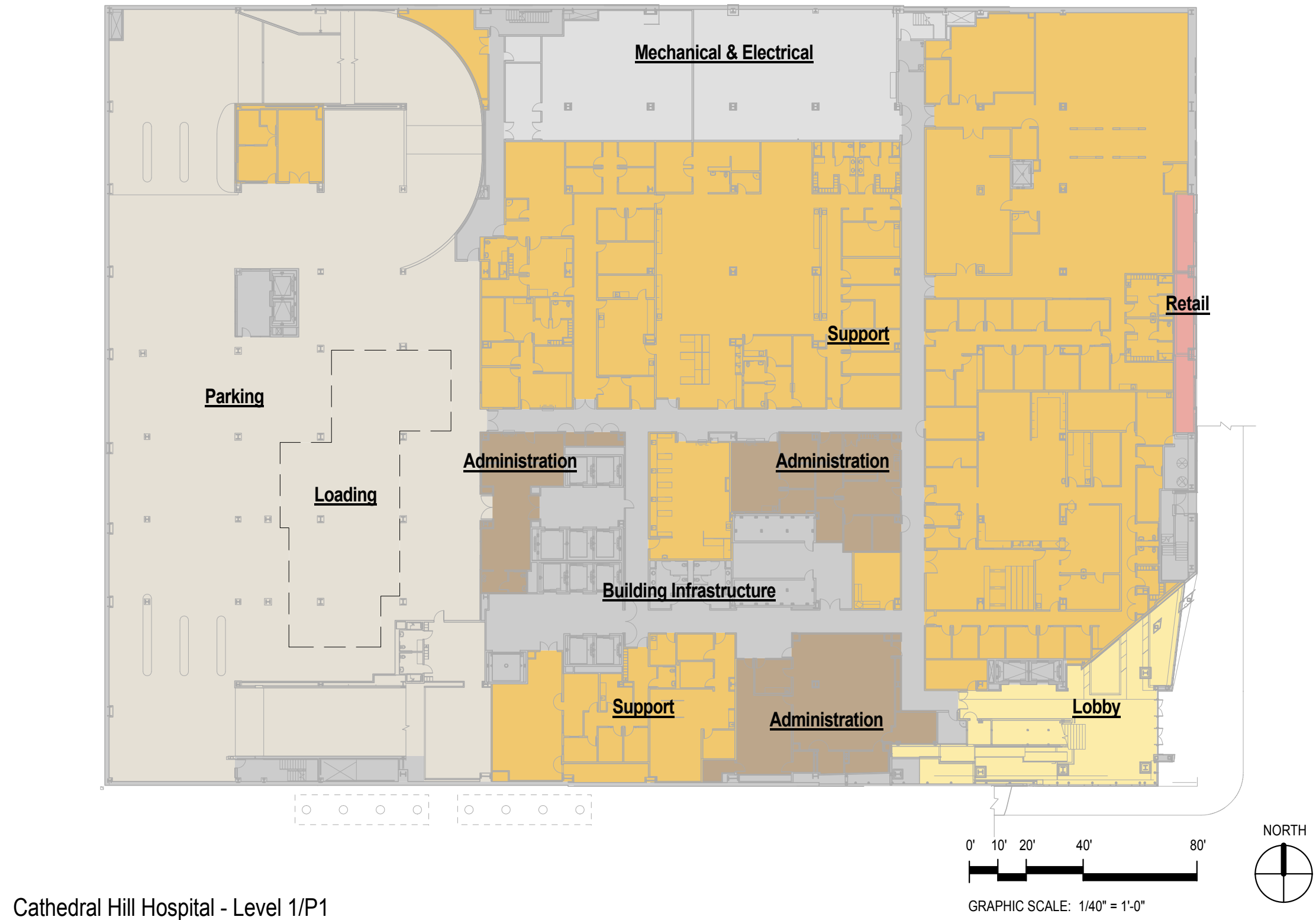


Figure 1-12: Cathedral Hill Hospital - Level 1/P1

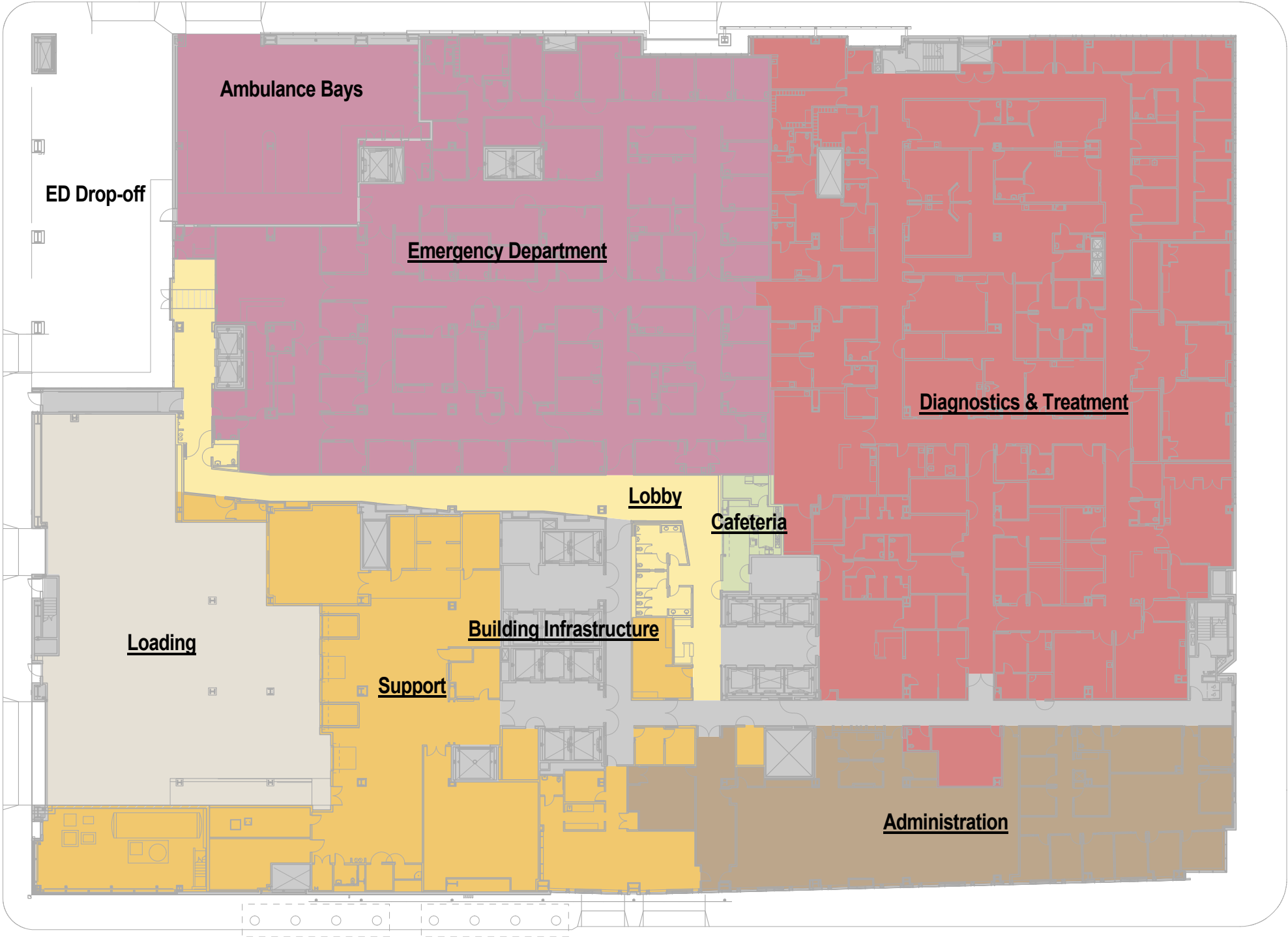


Cathedral Hill Hospital - Level 1/P1

Figure 1-13: Cathedral Hill Hospital - Level 2



Figure 1-14: Cathedral Hill Hospital - Level 3



Cathedral Hill Hospital - Level 3

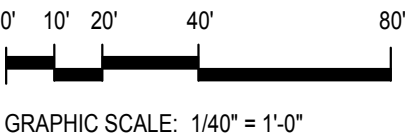


Figure 1-15: Cathedral Hill Hospital - Level 4



Cathedral Hill Hospital - Level 4

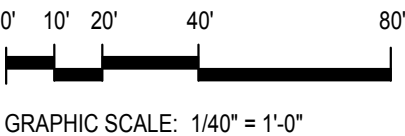
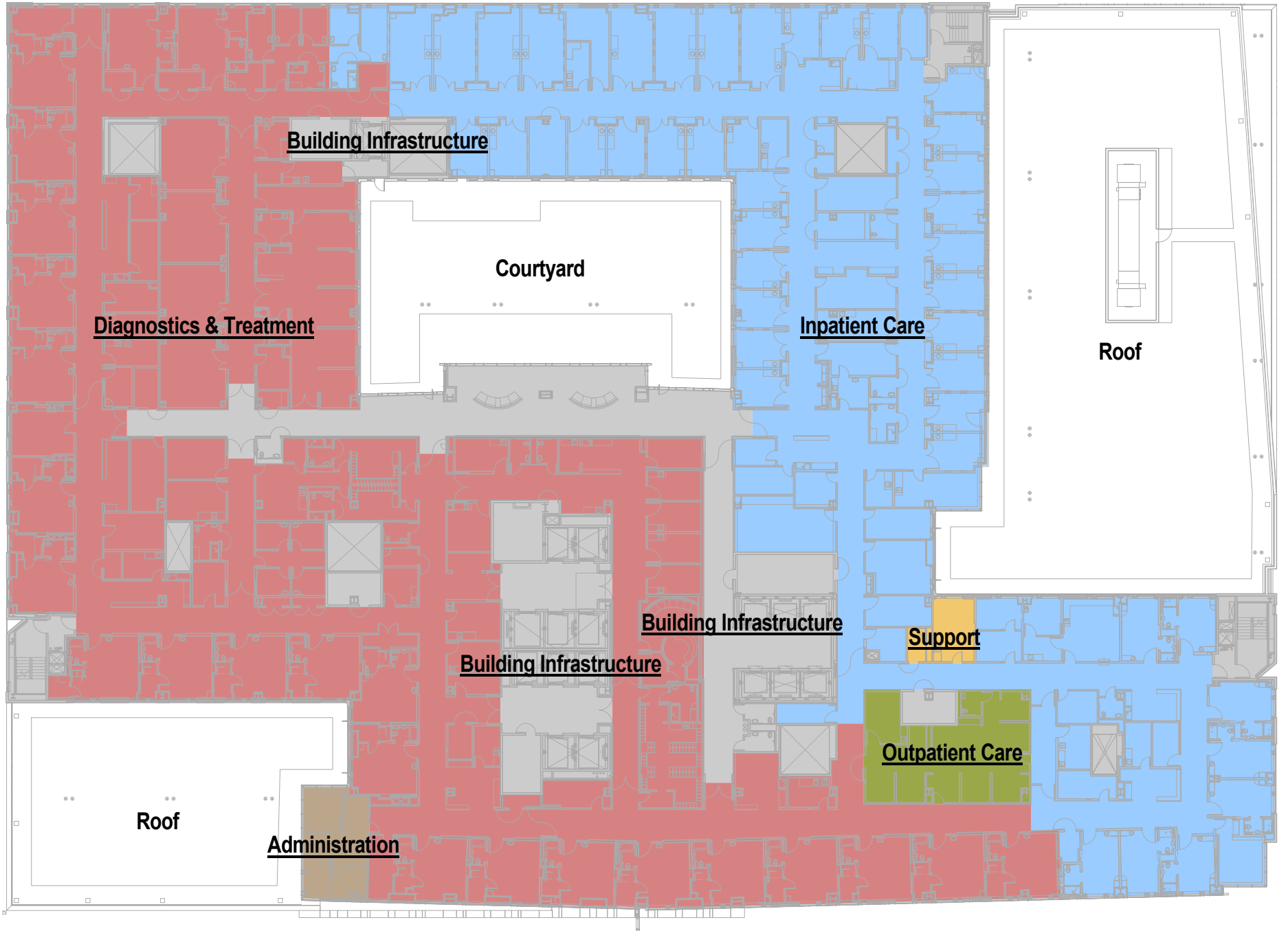


Figure 1-16: Cathedral Hill Hospital - Level 5



Cathedral Hill Hospital - Level 5

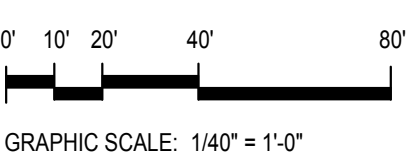


Figure 1-17: Cathedral Hill Hospital - Level 6

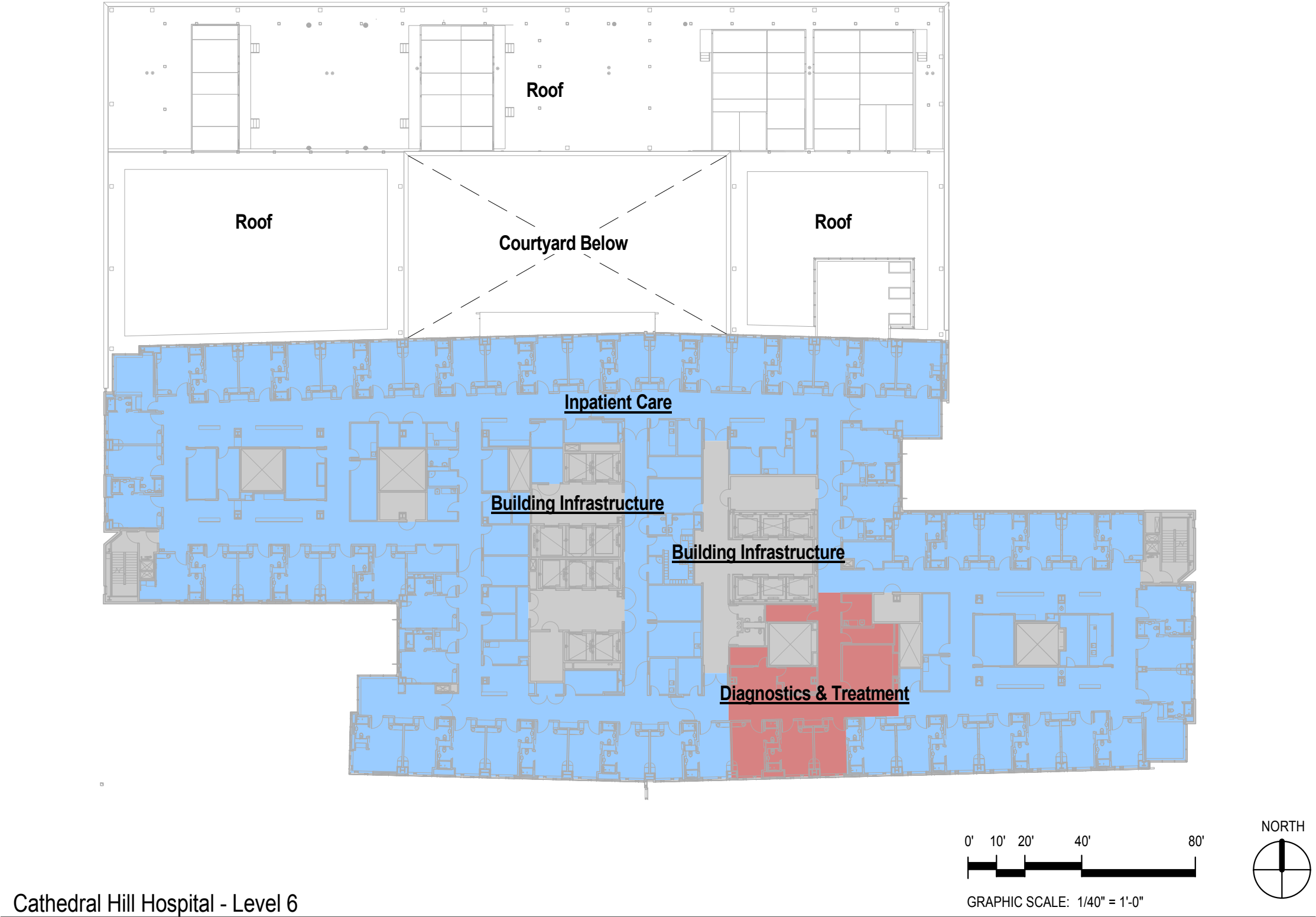


Figure 1-18: Cathedral Hill Hospital - Level P7

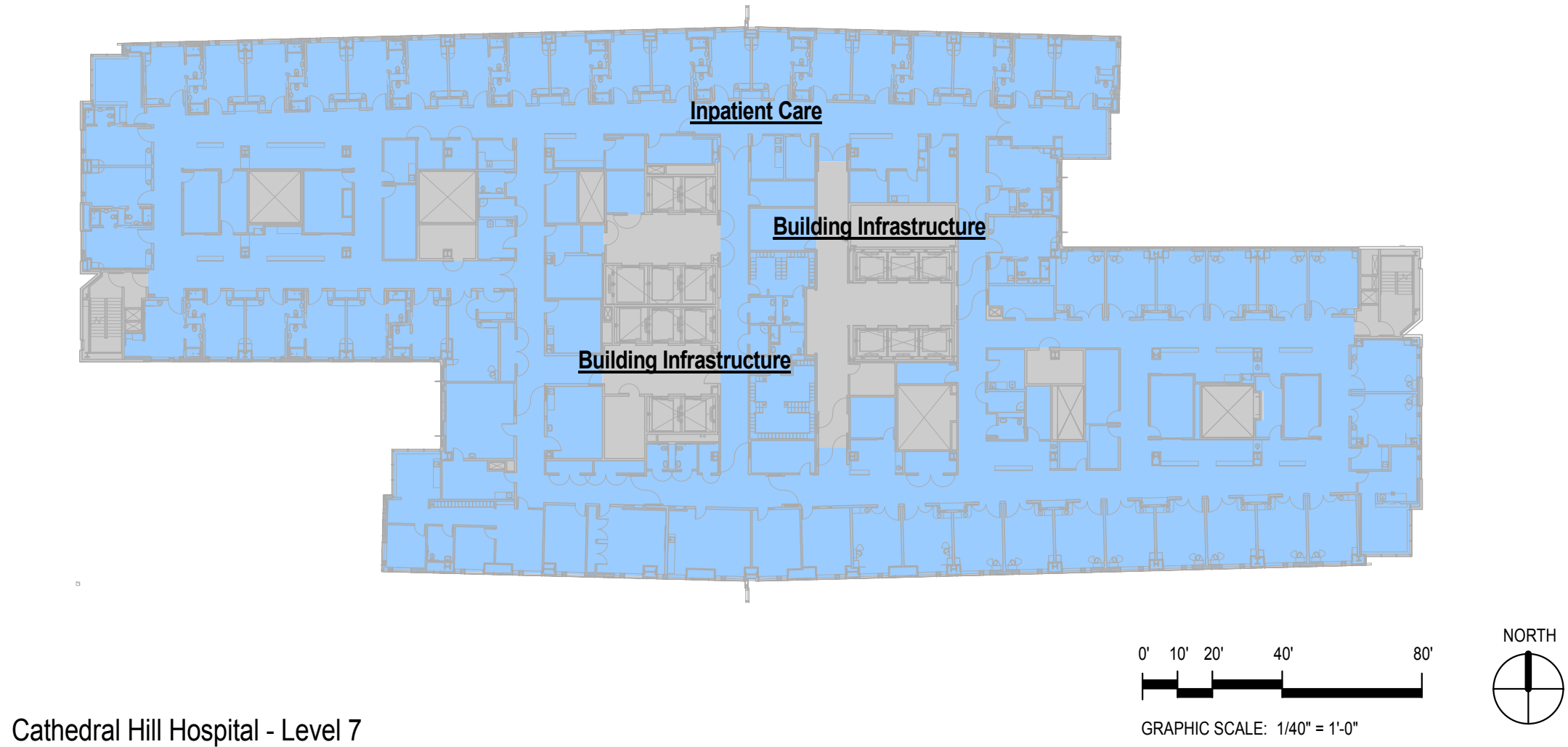
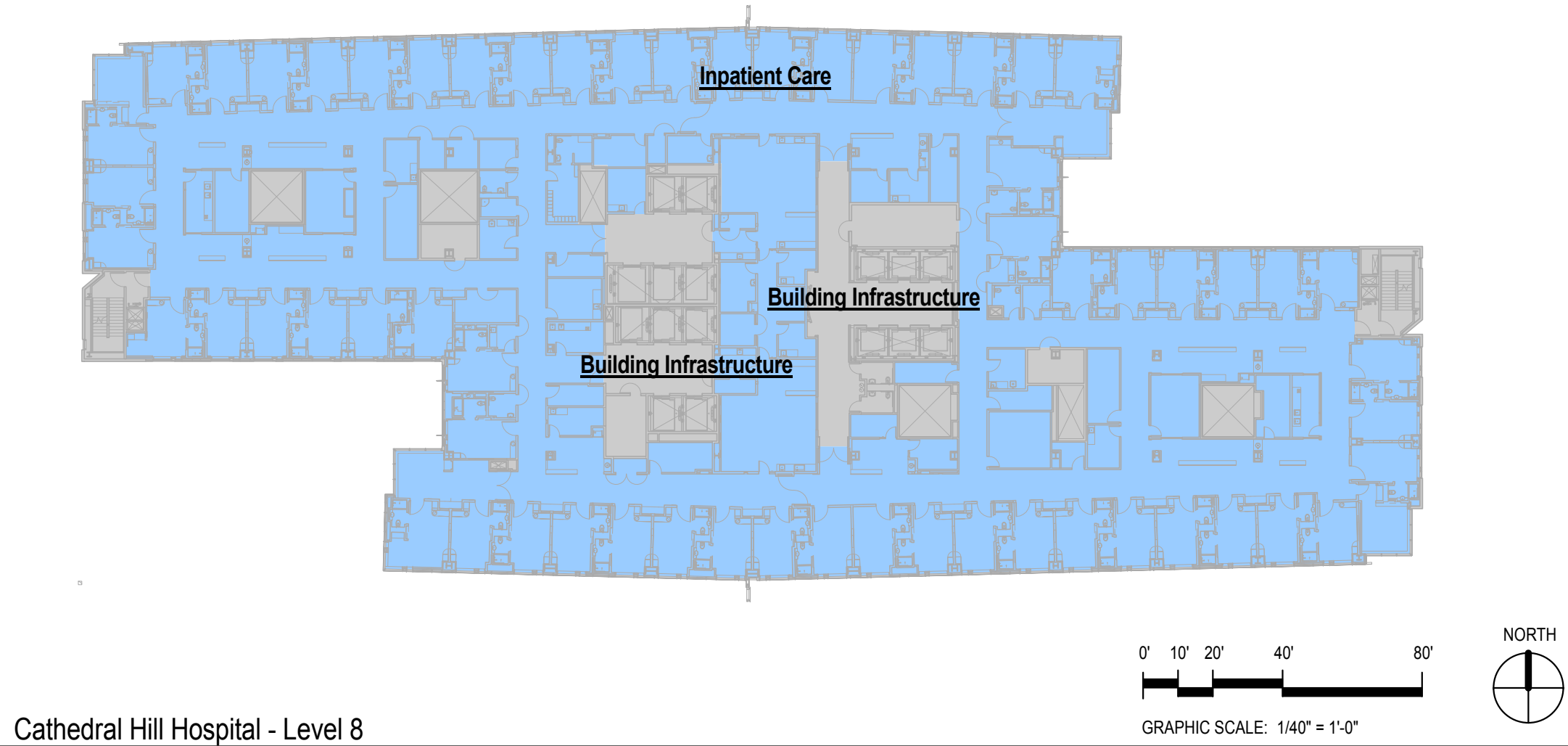
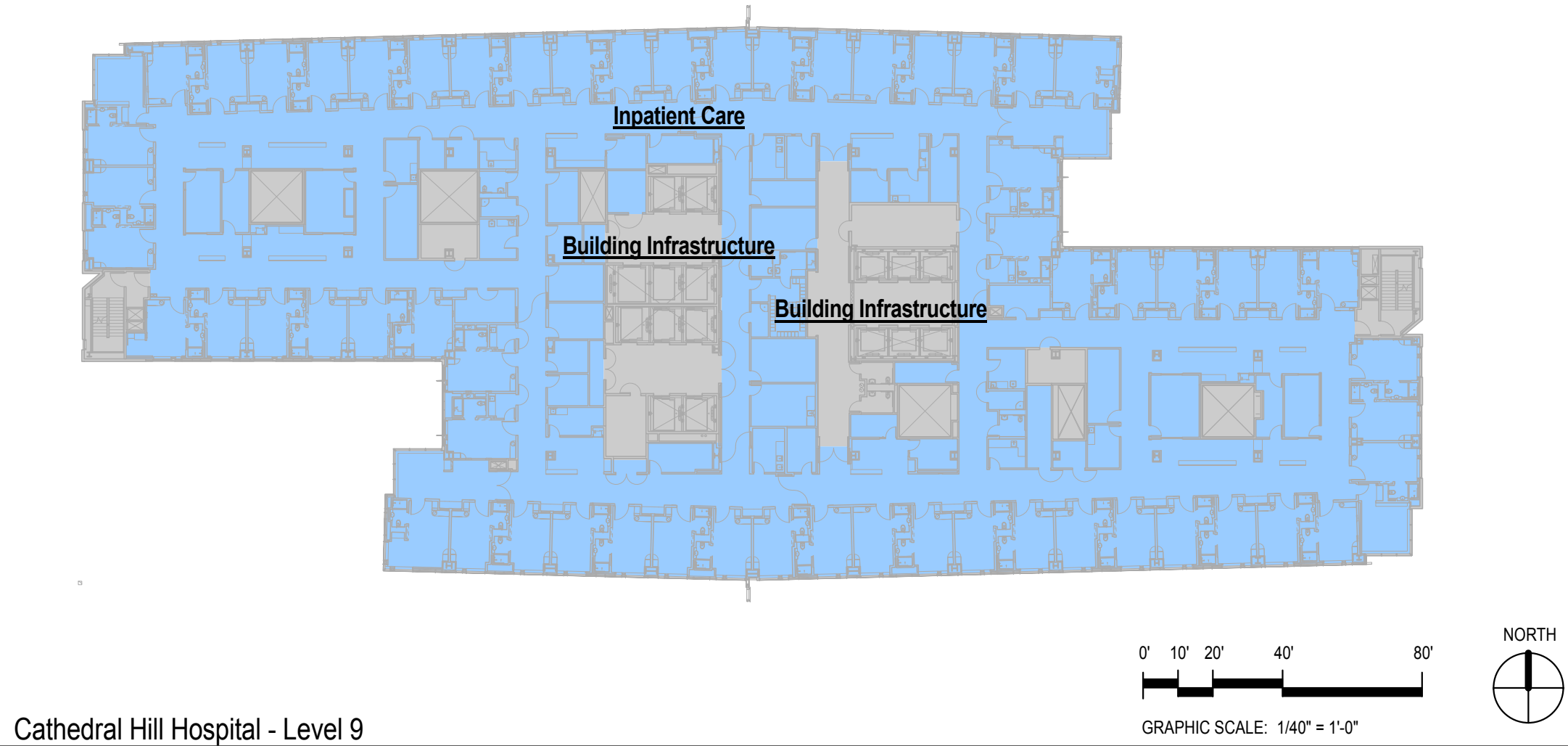


Figure 1-19: Cathedral Hill Hospital - Level 8



Cathedral Hill Hospital - Level 8

Figure 1-20: Cathedral Hill Hospital - Level 9



Cathedral Hill Hospital - Level 9

Figure 1-21: Cathedral Hill Hospital - Level 10

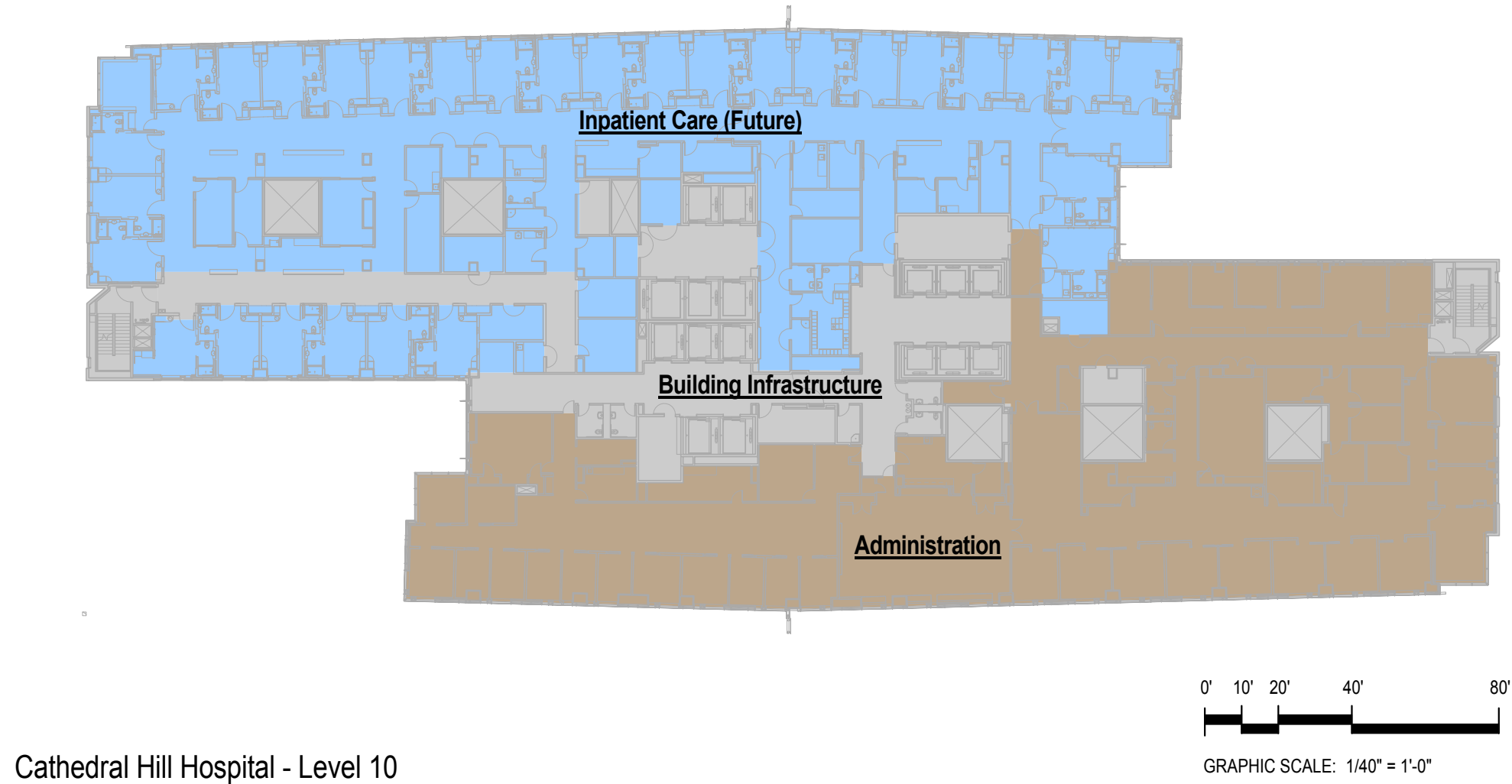
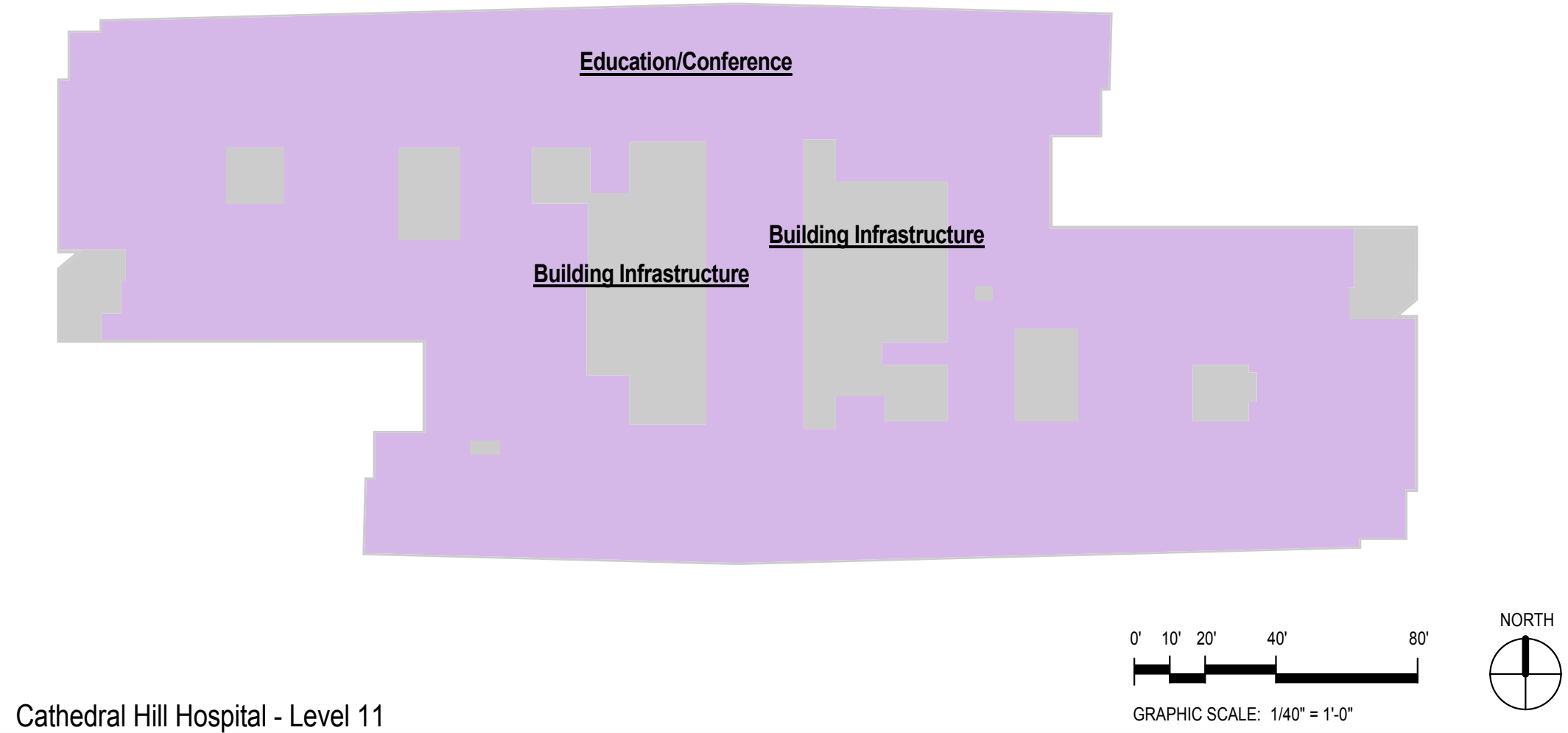
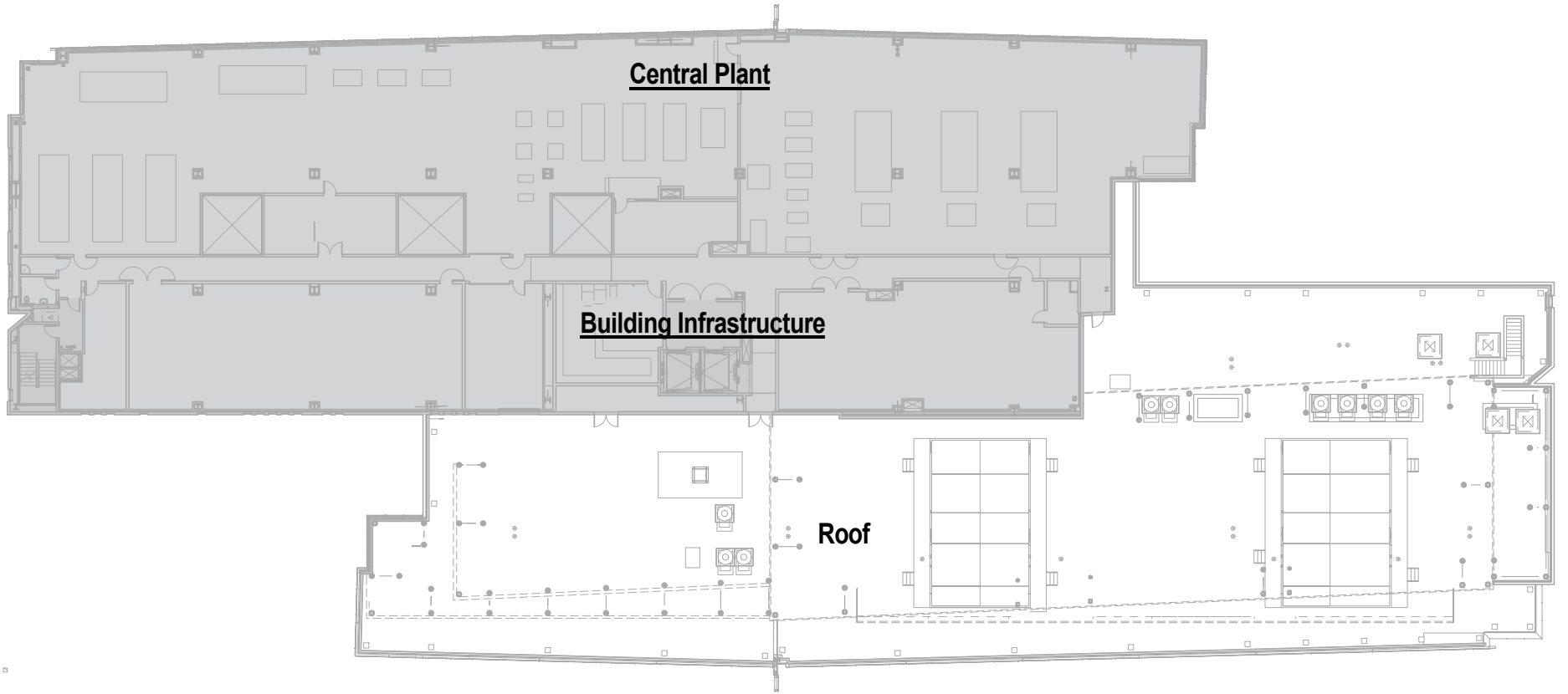


Figure 1-22: Cathedral Hill Hospital - Level 11



Cathedral Hill Hospital - Level 11

Figure 1-23: Cathedral Hill Hospital - Level 12



Cathedral Hill Hospital - Level 12

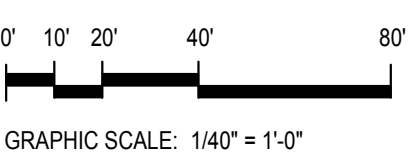
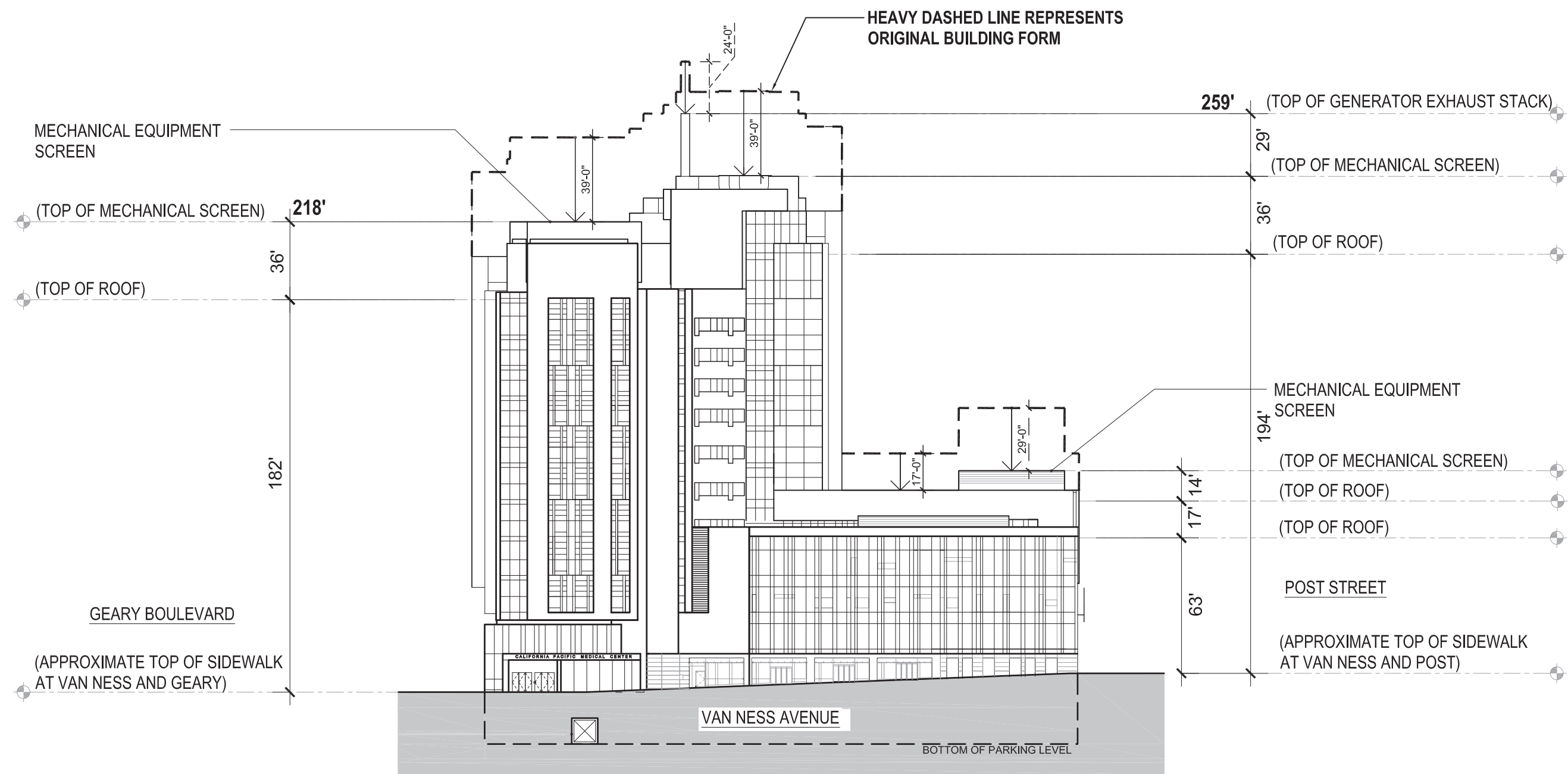


Figure 1-24: East Elevation Comparison of Revised Project to Previous Project

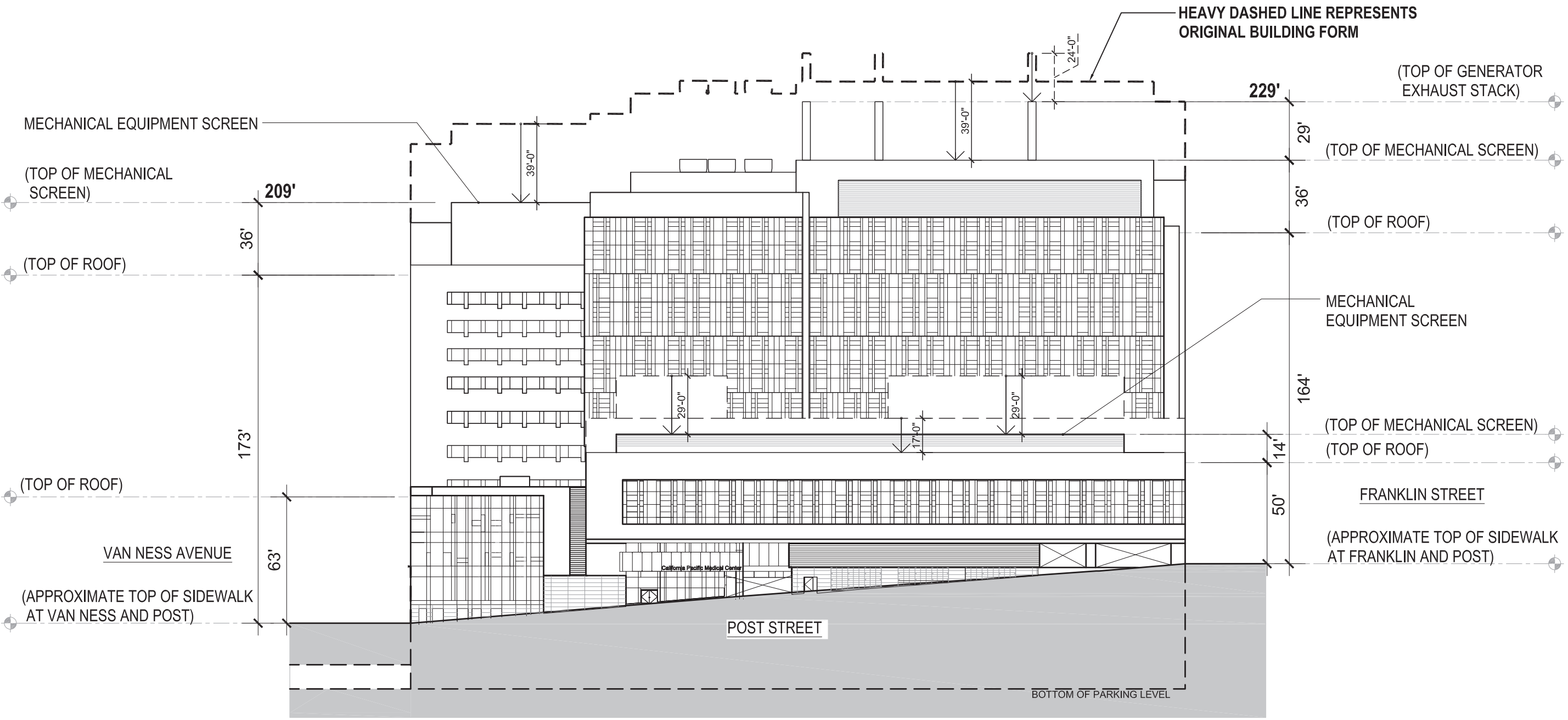


NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

APPROXIMATE SCALE 0' 10' 20' 50'

EAST ELEVATION

Figure 1-25: North Elevation Comparison of Revised Project to Previous Project

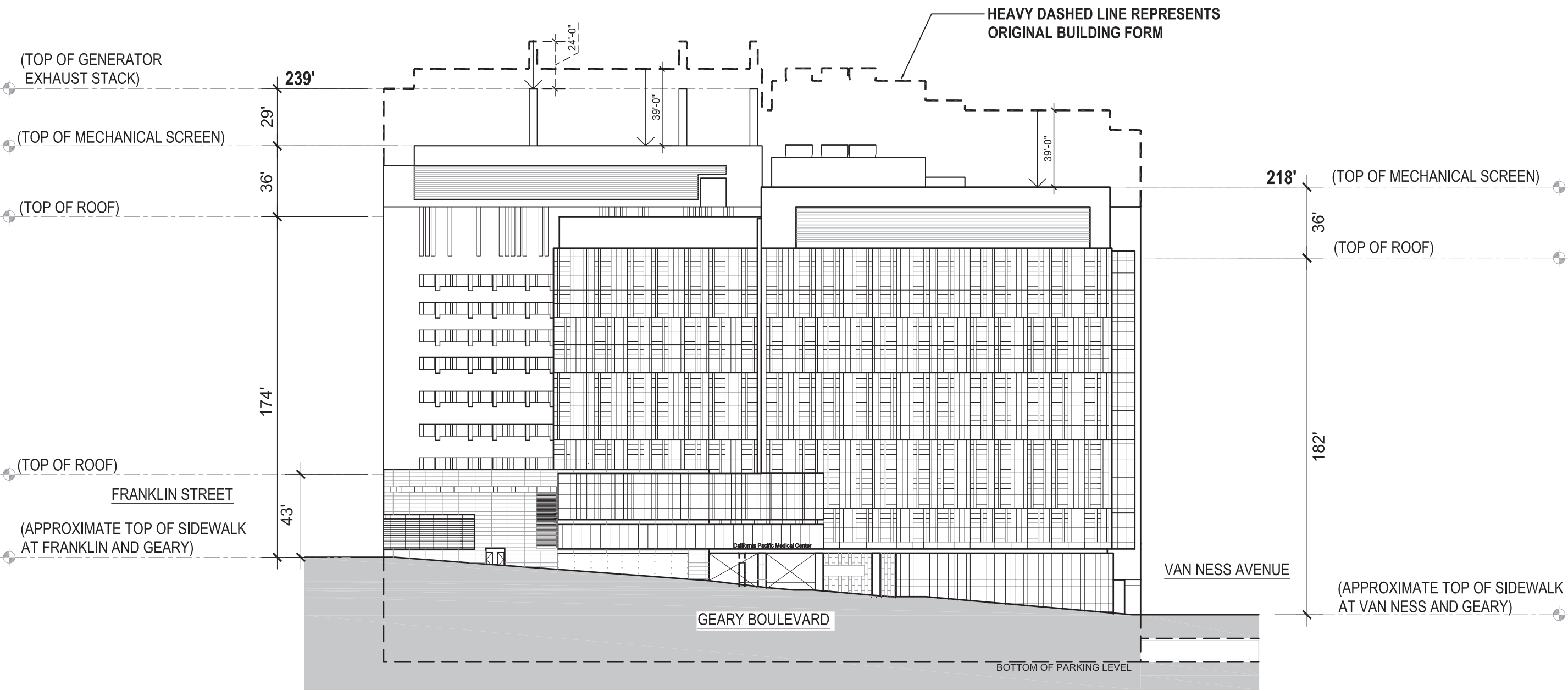


NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

APPROXIMATE SCALE 0' 10' 20' 50'

NORTH ELEVATION

Figure 1-26: South Elevation Comparison of Revised Project to Previous Project

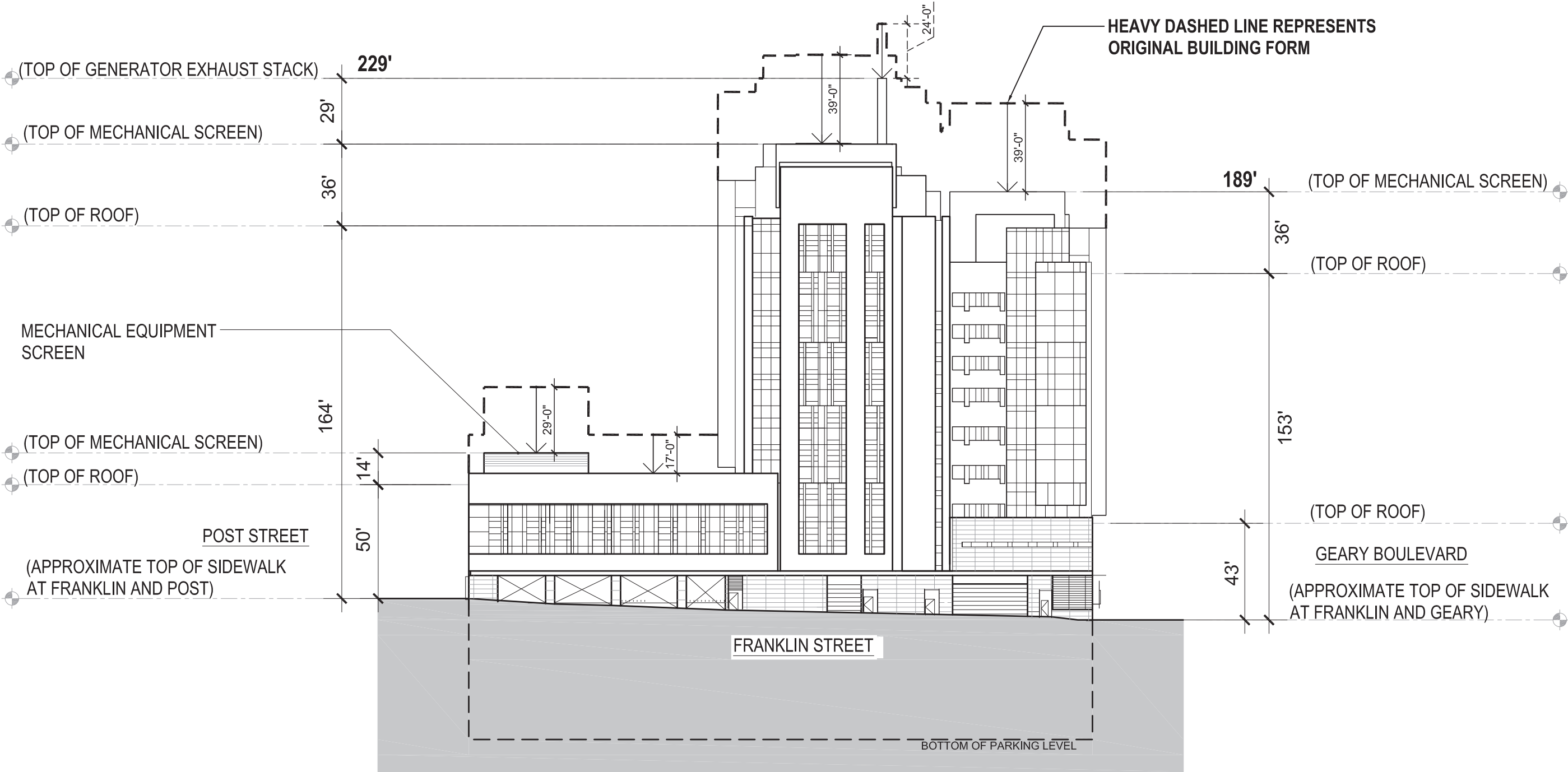


NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

APPROXIMATE SCALE 0' 10' 20' 50'

SOUTH ELEVATION

Figure 1-27: West Elevation Comparison of Revised Project to Previous Project

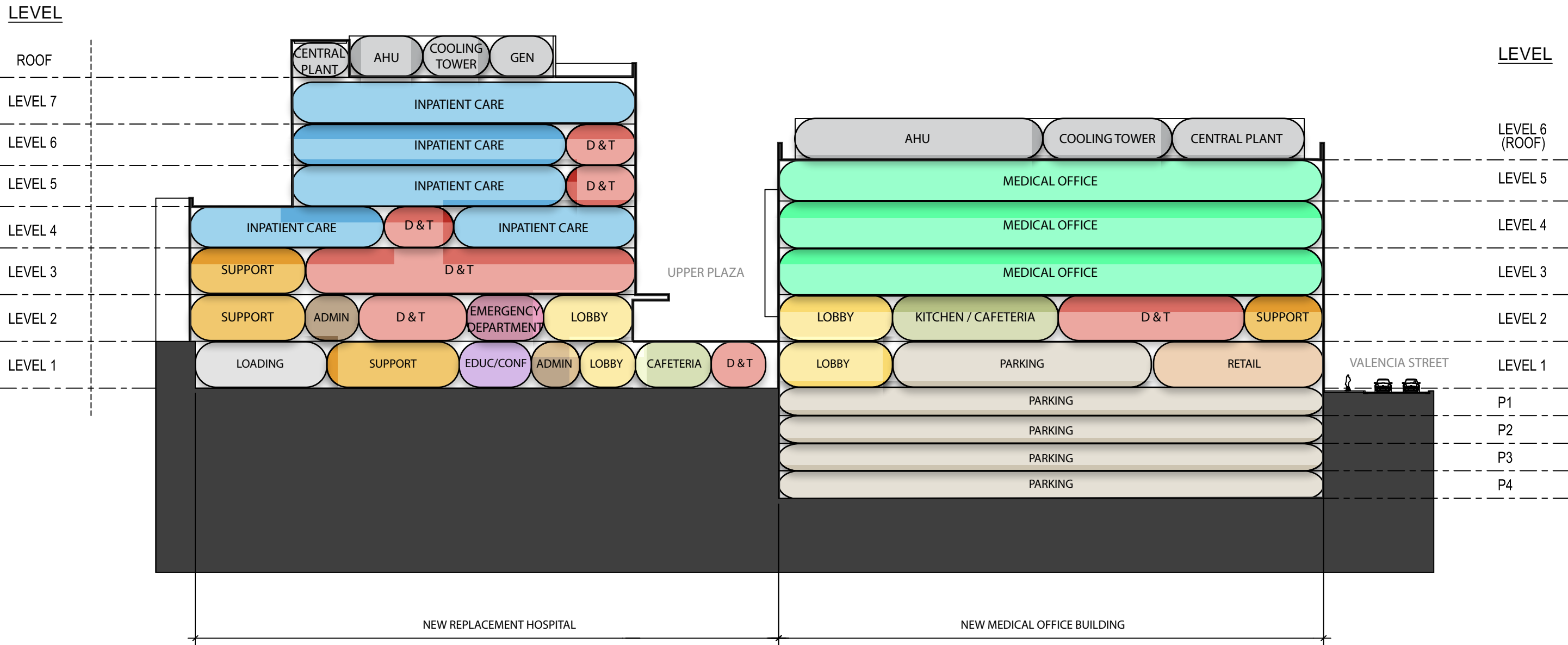


NOTE: BUILDING HEIGHTS SHOWN ARE APPROXIMATE.
BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT INTERSECTIONS INDICATED

APPROXIMATE SCALE 0' 10' 20' 50'

WEST ELEVATION

Figure 1-28: St. Luke's Campus Stacking Diagram



* NOTE : STACKING DIAGRAM IS FOR ILLUSTRATIVE PURPOSES ONLY AND IS NOT TO SCALE

STACKING DIAGRAM

ST LUKE'S CAMPUS - HOSPITAL

SMITHGROUPJJR / BOULDER ASSOCIATES

CPMC LRDP Revised Project
CPMC LONG RANGE DEVELOPMENT PLAN

Figure 1-29: St. Luke's Campus Site Plan

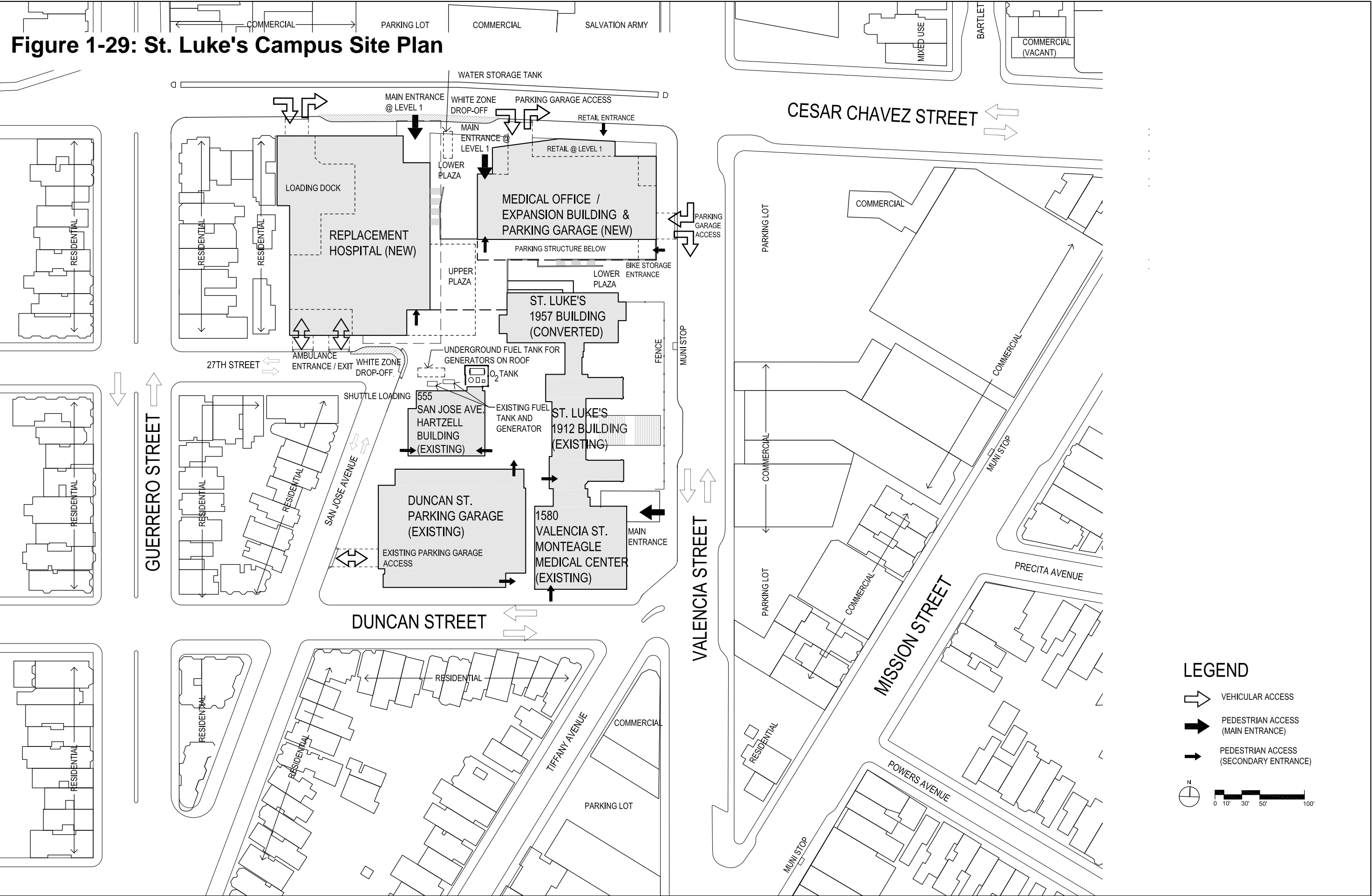
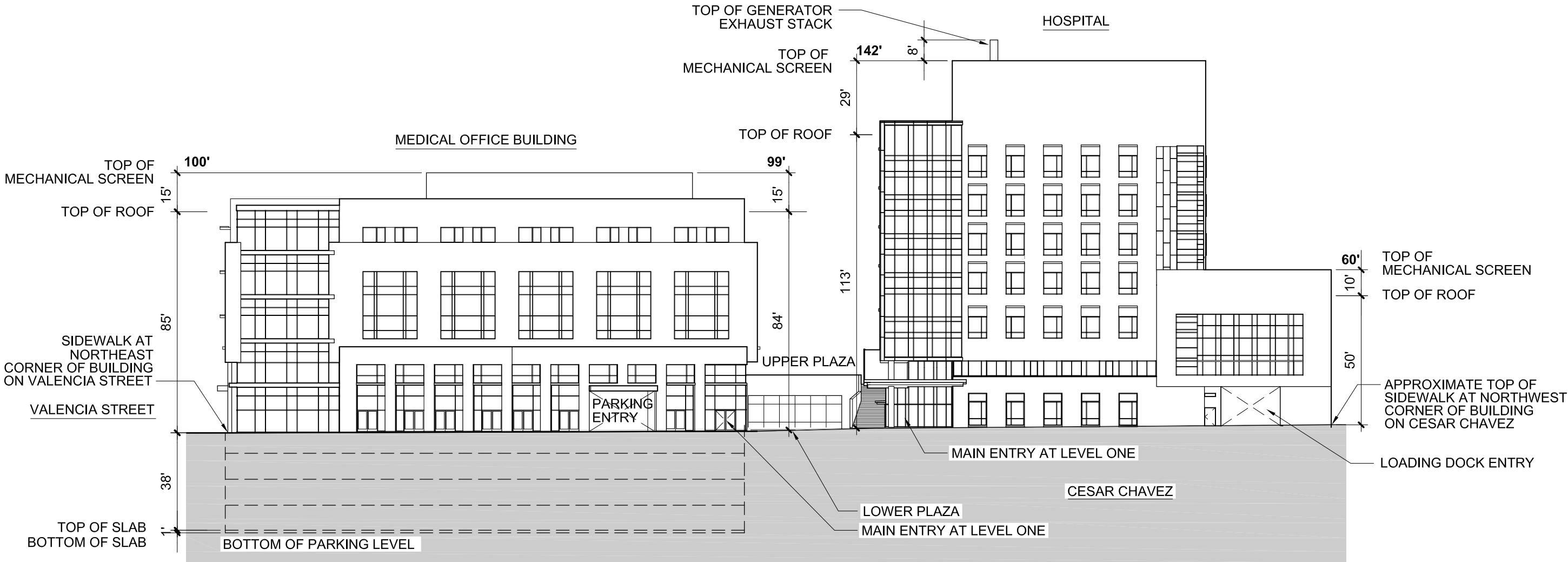


Figure 1-30: St. Luke's Campus North Elevation



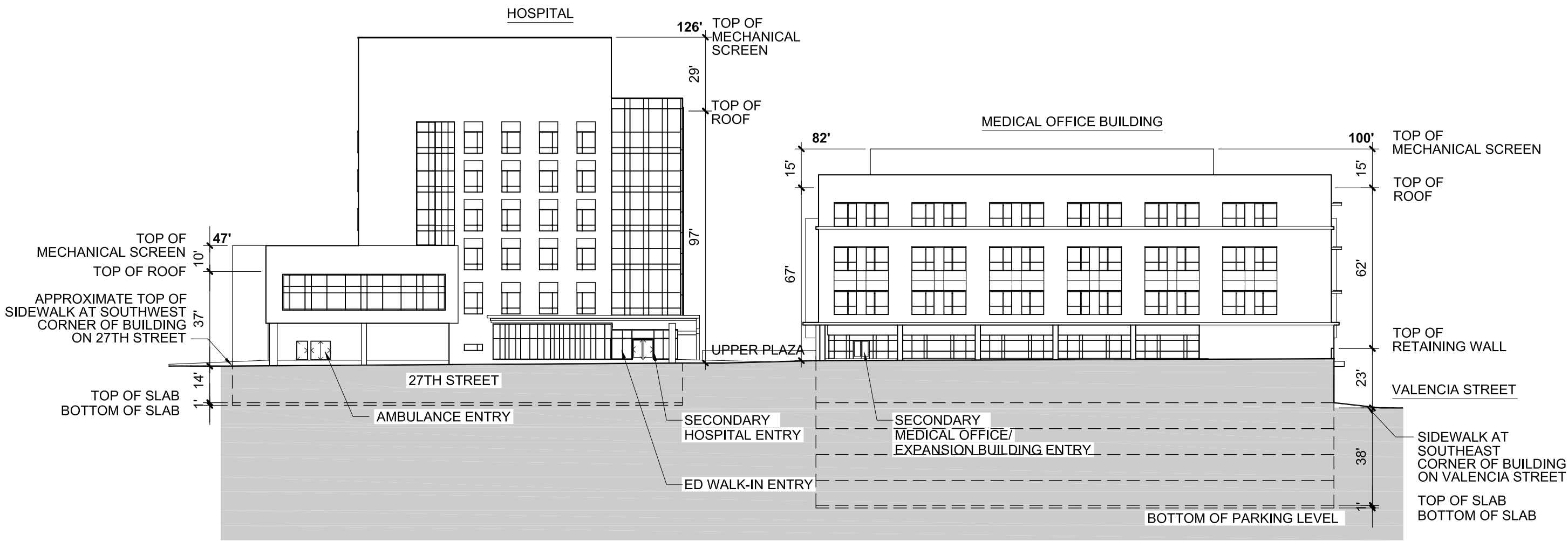
NORTH ELEVATION
SOURCE: SMITHGROUP
AND BOULDER ASSOCIATES

- NOTES:
1. BUILDING HEIGHTS SHOWN ARE APPROXIMATE
 2. BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT LOCATIONS INDICATED

APPROXIMATE
SCALE

0 5' 10' 20' 40'

Figure 1-31: St. Luke's Campus South Elevation



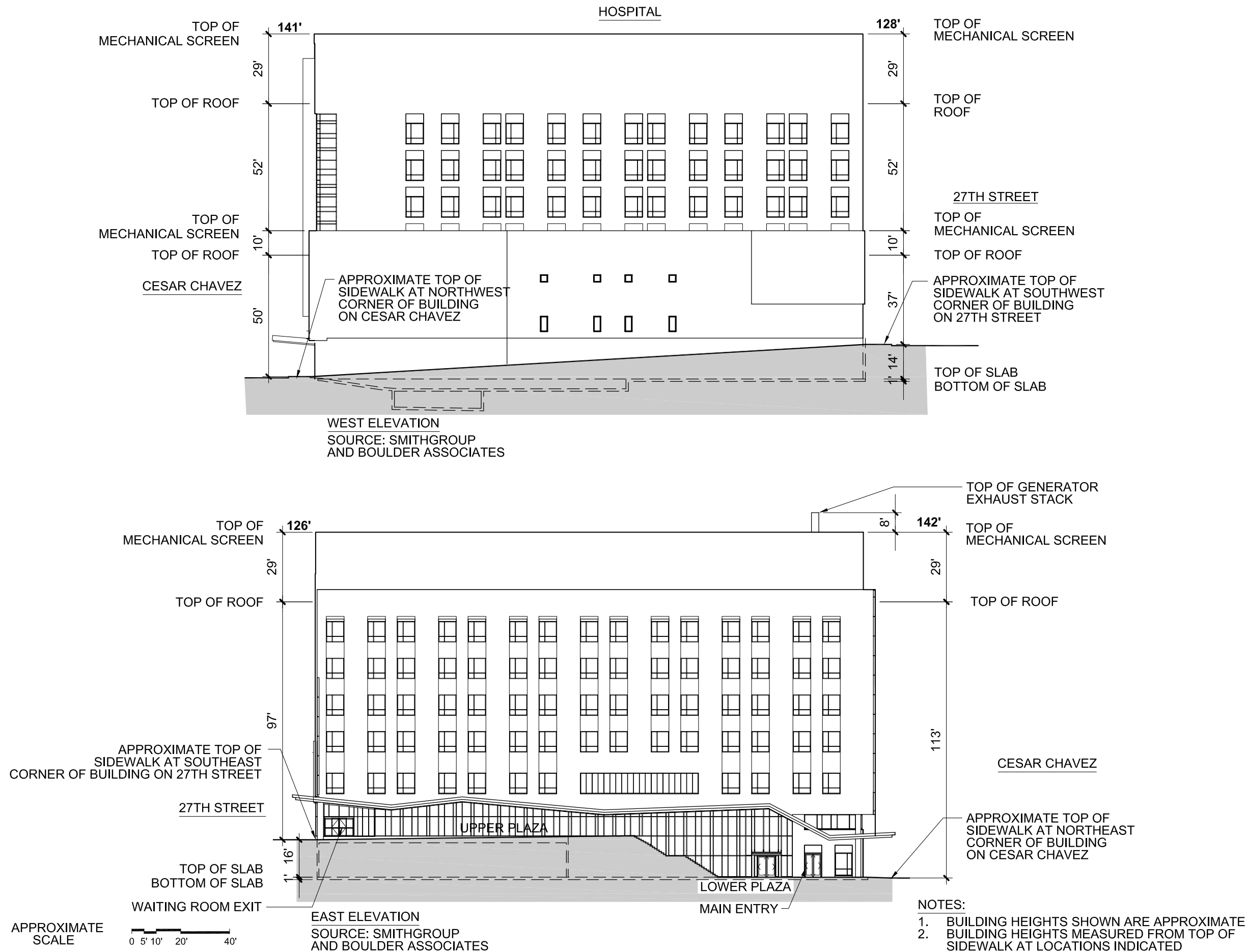
SOUTH ELEVATION
SOURCE: SMITHGROUP
AND BOULDER ASSOCIATES

- NOTES:
- 1. BUILDING HEIGHTS SHOWN ARE APPROXIMATE
 - 2. BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT LOCATIONS INDICATED

APPROXIMATE
SCALE

0 5' 10' 20' 40'

Figure 1-32: St. Luke's Campus West/East Elevation



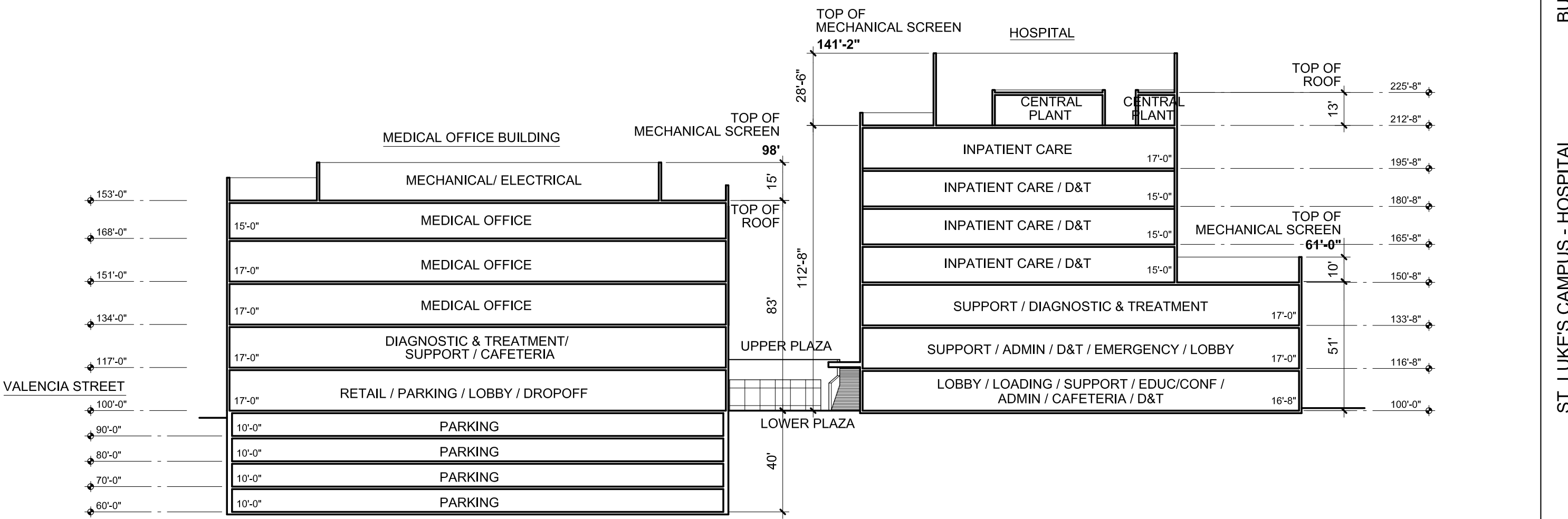
ELEVATIONS

ST. LUKE'S CAMPUS - HOSPITAL

SMITHGROUPJJR / BOULDER ASSOCIATES

CPMC LRDV Revised Project
CPMC LONG RANGE DEVELOPMENT PLAN

Figure 1-33: St. Luke's Campus East/West Section



EAST / WEST SECTION
SOURCE: SMITHGROUP
AND BOULDER ASSOCIATES

- NOTES:
- 1. BUILDING HEIGHTS SHOWN ARE APPROXIMATE
 - 2. FOR PURPOSES OF THIS DIAGRAM, FIRST FLOOR ELEVATION SHOWN AT 100'-0"
 - 3. TOP OF BUILDING HEIGHTS SHOWN ARE FROM LEVEL 1

APPROXIMATE
SCALE

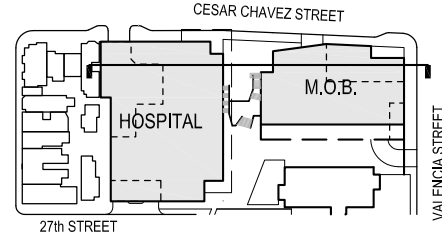
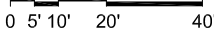
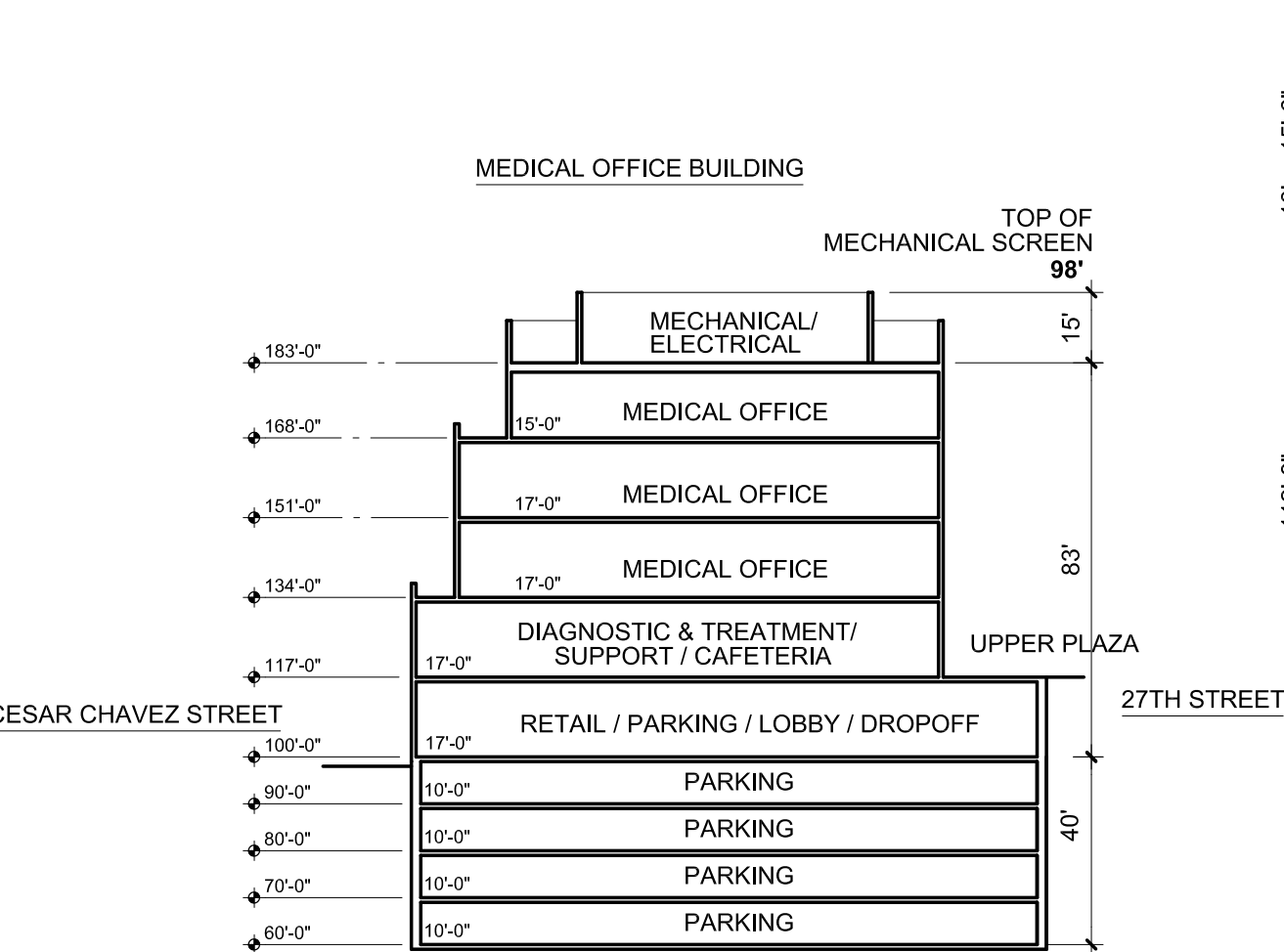
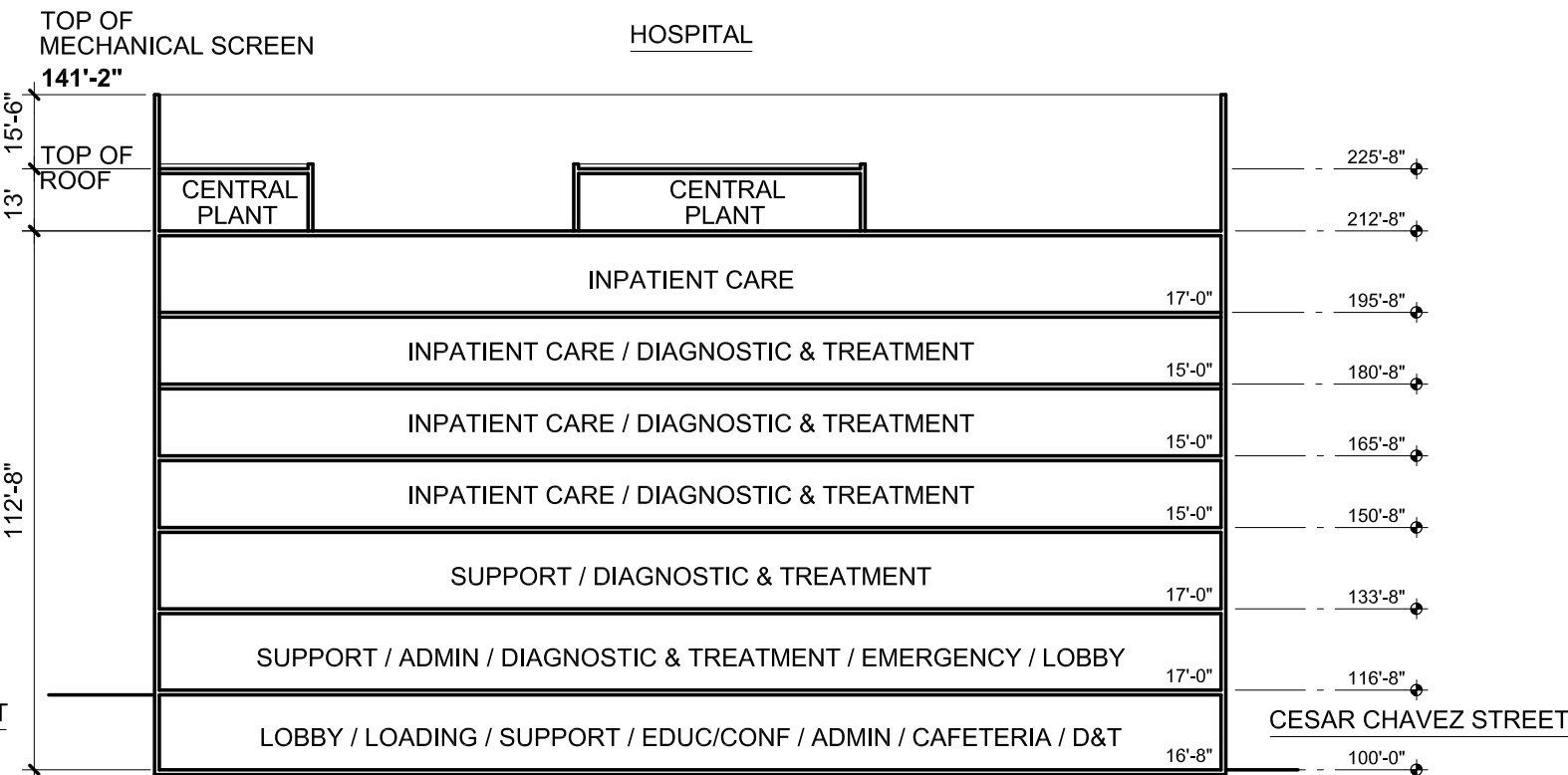


Figure 1-34: St. Luke's Campus North/South Section



NORTH / SOUTH SECTION
SOURCE: SMITHGROUP
AND BOULDER ASSOCIATES



NORTH/SOUTH SECTION
SOURCE: SMITHGROUP
AND BOULDER ASSOCIATES

- NOTES:
- 1. BUILDING HEIGHTS SHOWN ARE APPROXIMATE
 - 2. FOR PURPOSES OF THIS DIAGRAM, FIRST FLOOR ELEVATION IS SET AT 100'-0"
 - 3. TOP OF BUILDING HEIGHTS SHOWN ARE FROM LEVEL 1

APPROXIMATE SCALE

0 5' 10' 20' 40'

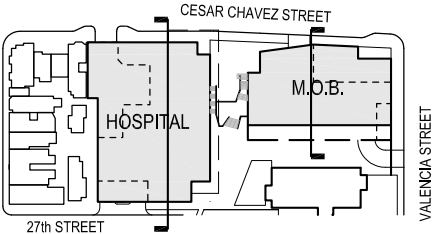
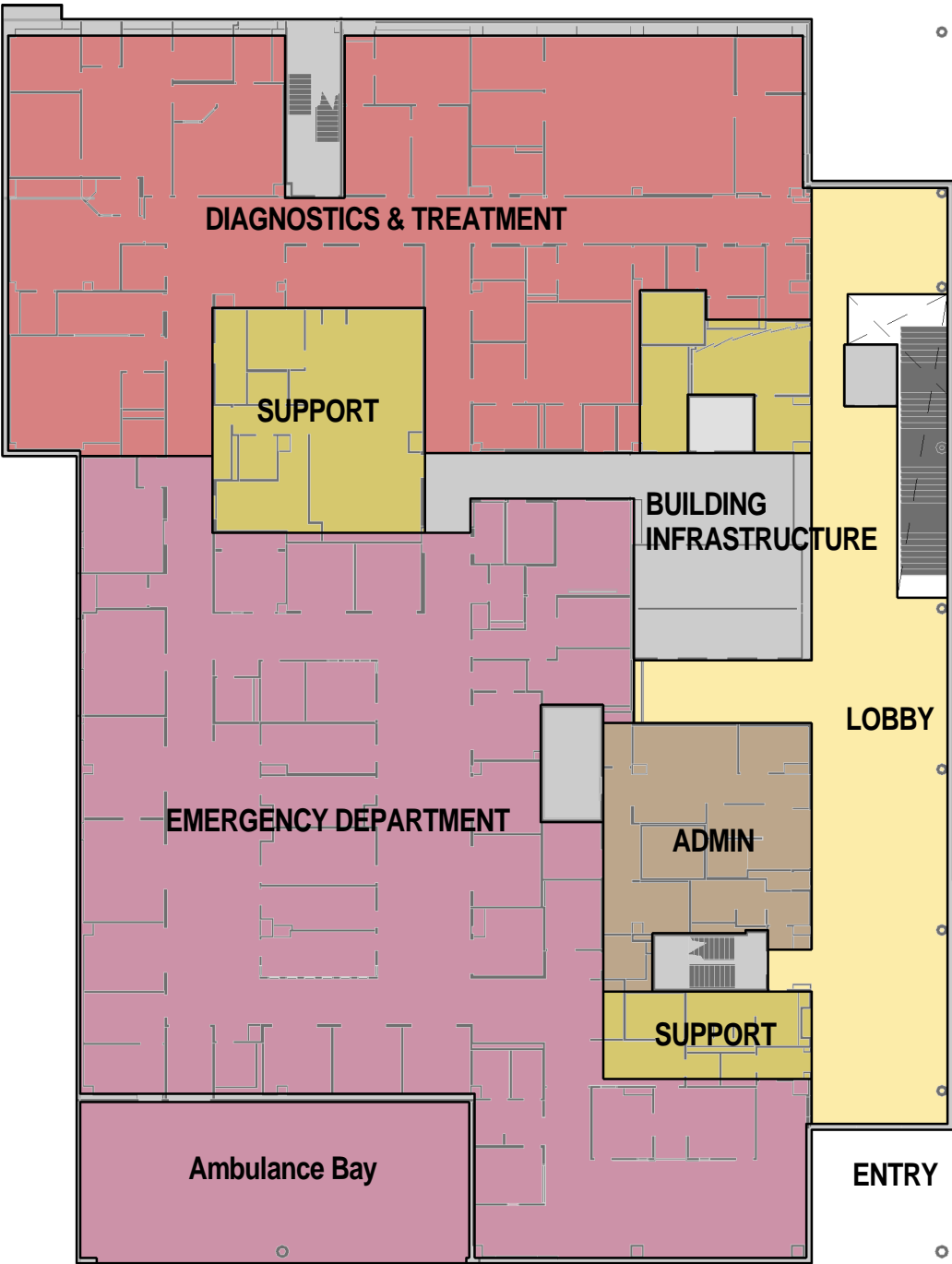
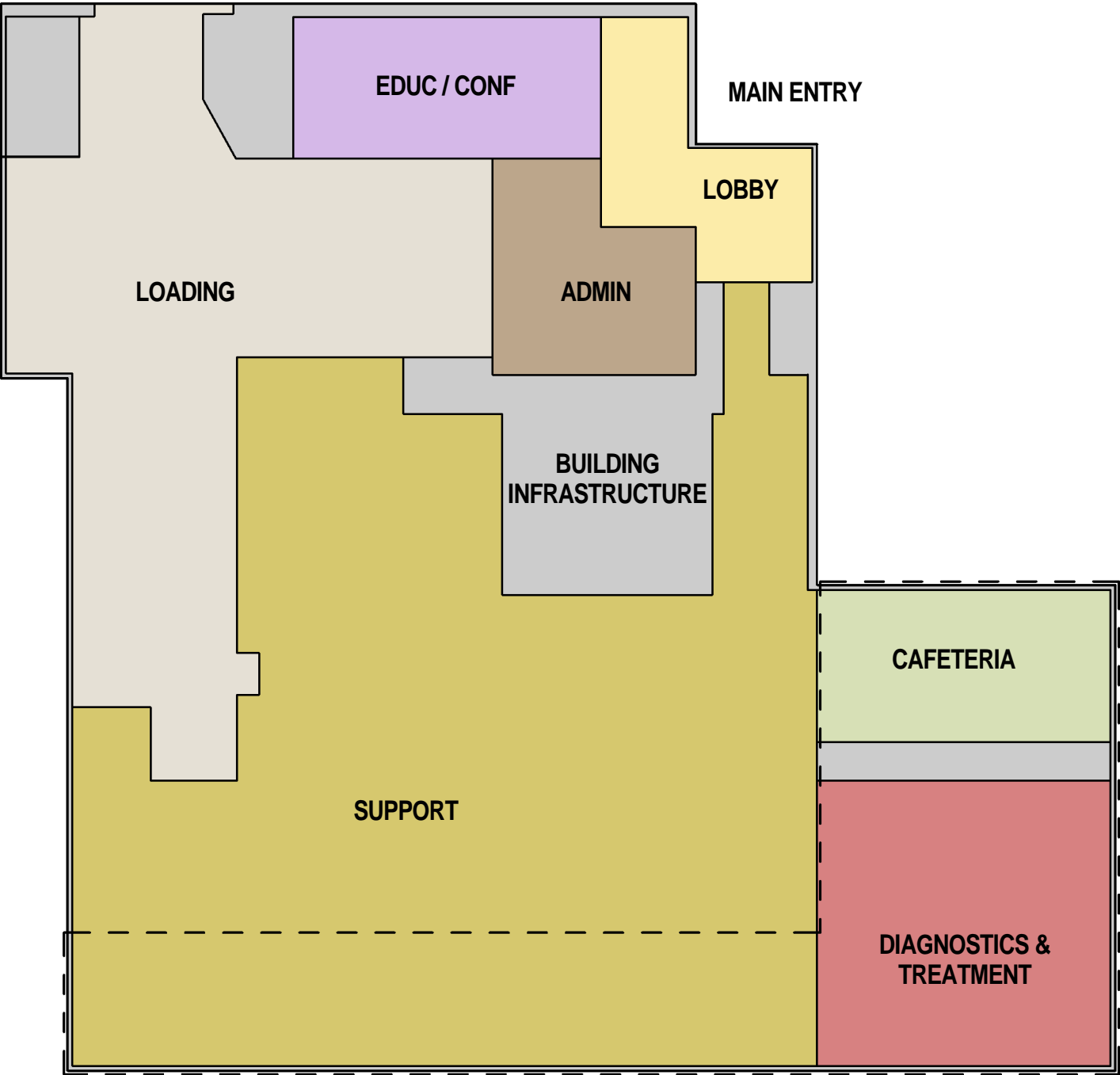


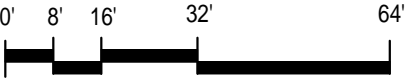
Figure 1-35: St. Luke's Hospital - Level 1 & 2



St Luke's Hospital - Level 2



St Luke's Hospital - Level 1



GRAPHIC SCALE: 1/32" = 1'-0"



FLOOR PLAN

ST LUKE'S CAMPUS - HOSPITAL

SMITHGROUPJJR / BOULDER ASSOCIATES

CPMC LRDP Revised Project
CPMC LONG RANGE DEVELOPMENT PLAN

Figure 1-36: St. Luke's Hospital - Level 3 & 4

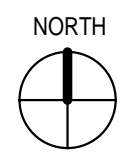
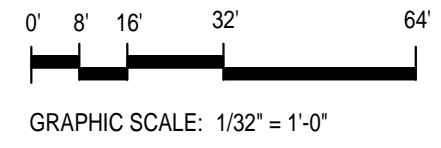
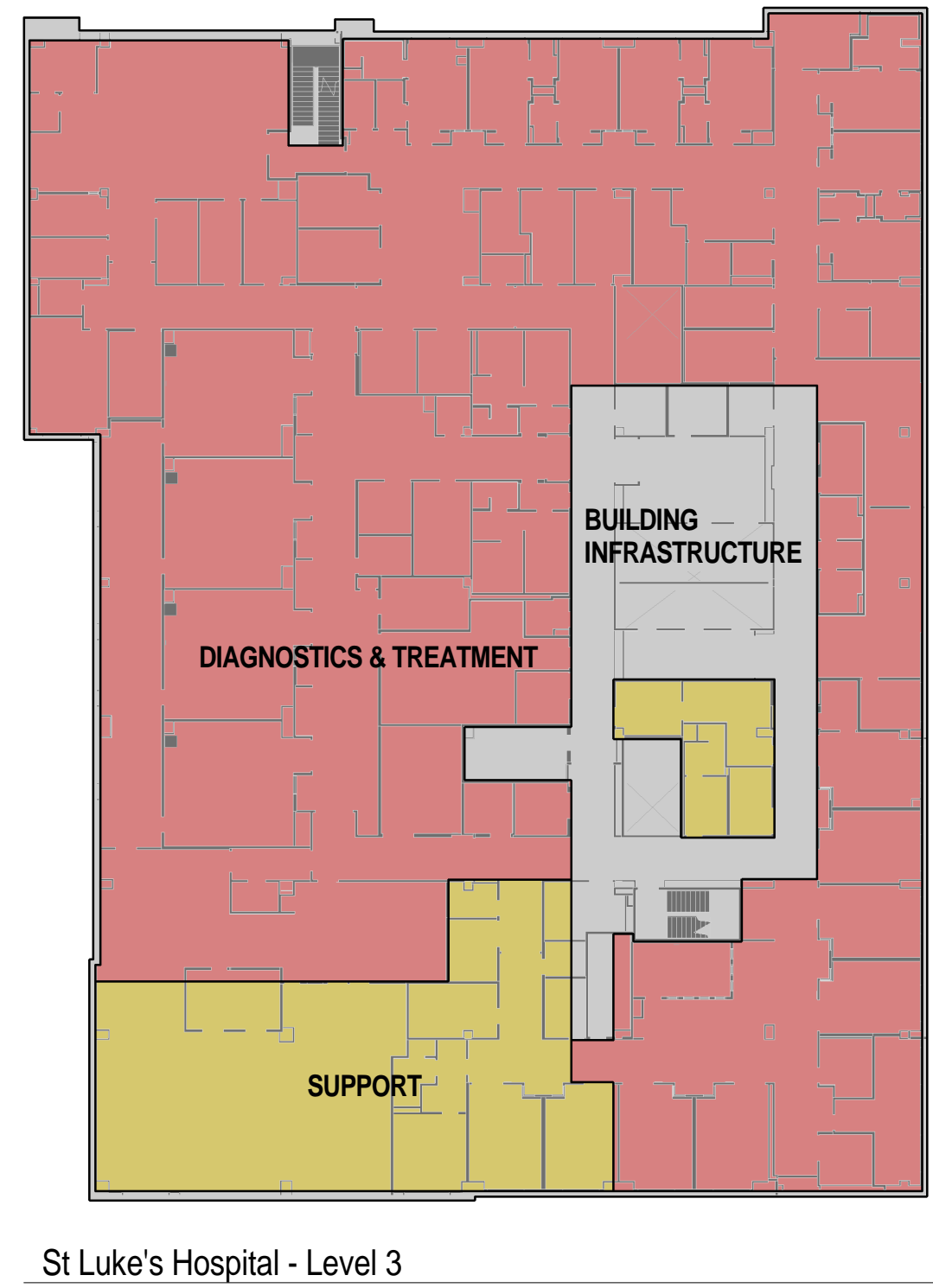
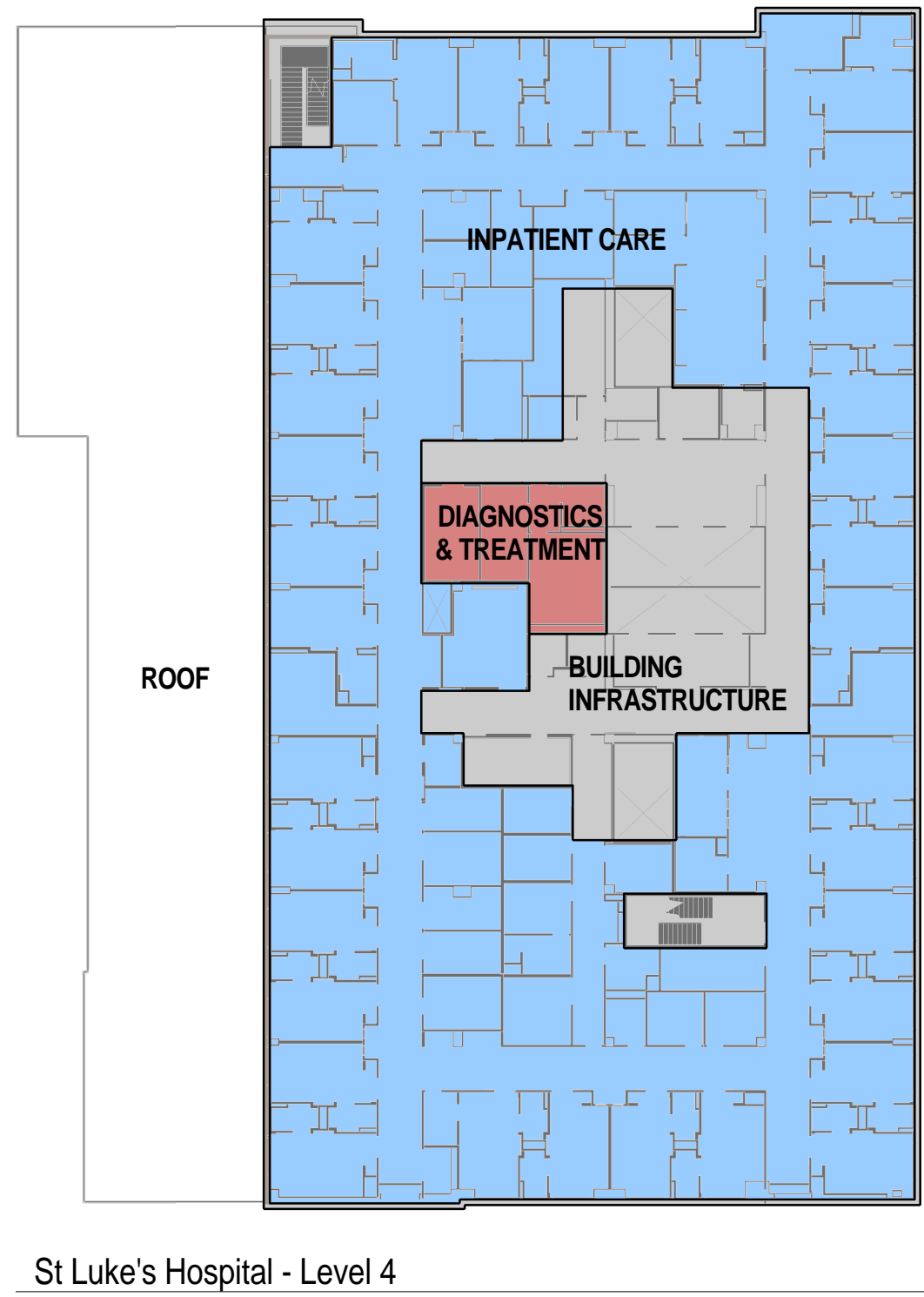
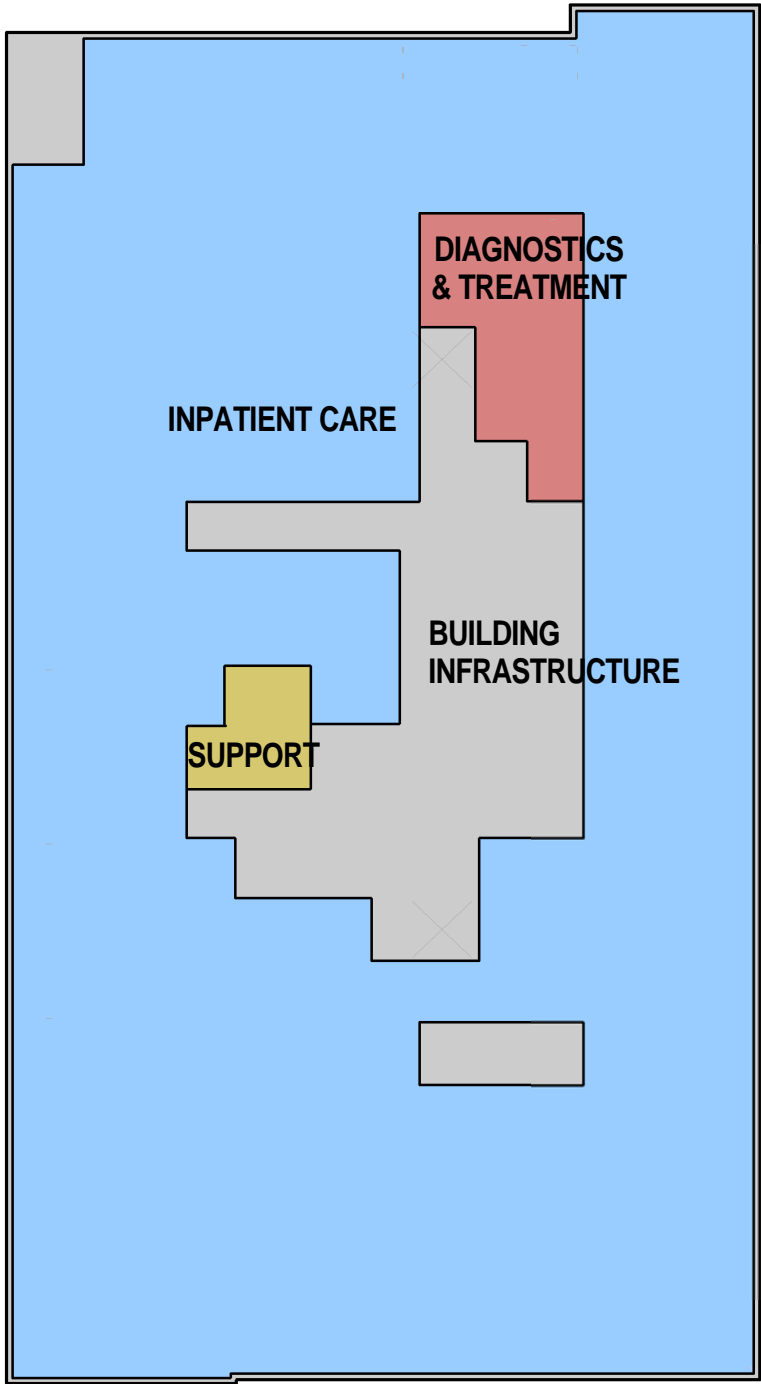
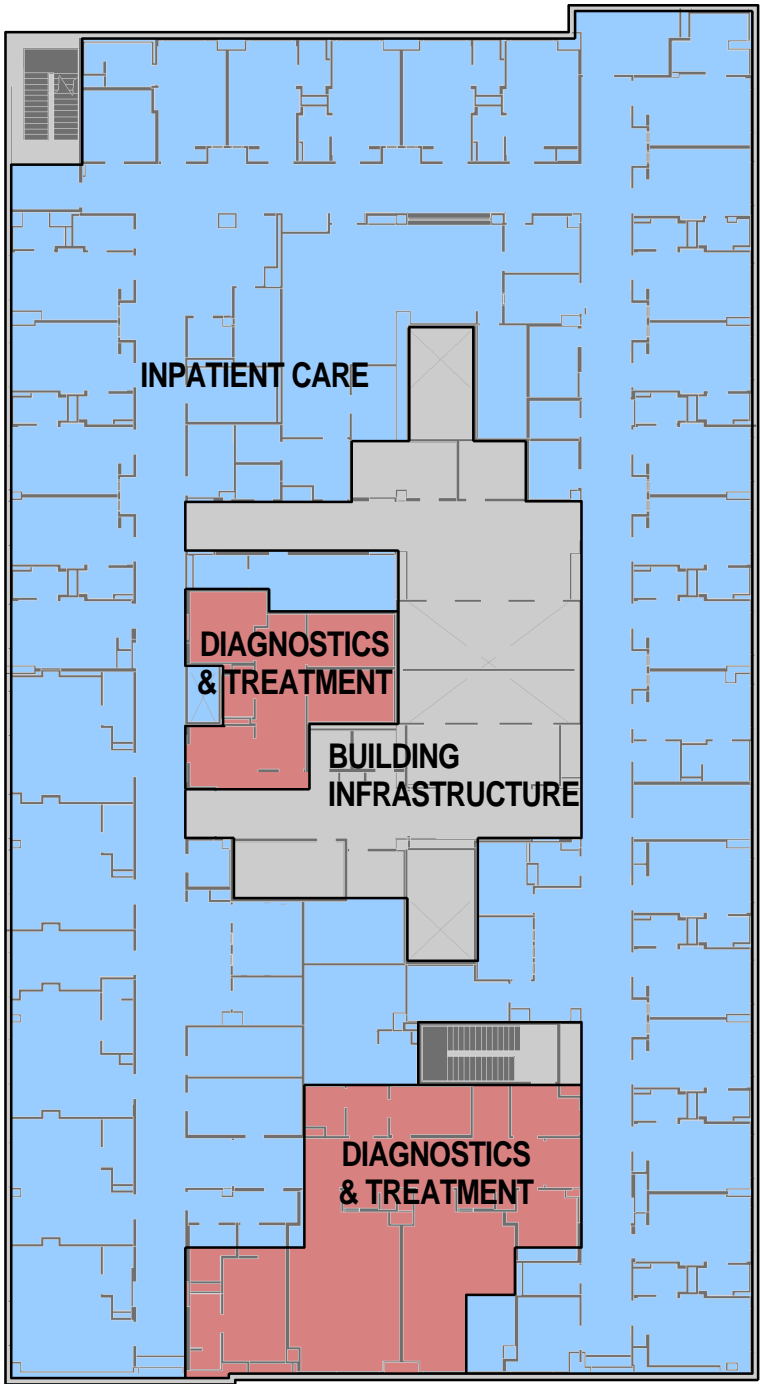


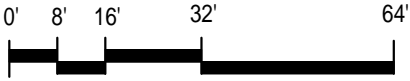
Figure 1-37: St. Luke's Hospital - Level 5 & 6



St Luke's Hospital - Level 6



St Luke's Hospital - Level 5



GRAPHIC SCALE: 1/32" = 1'-0"



FLOOR PLAN

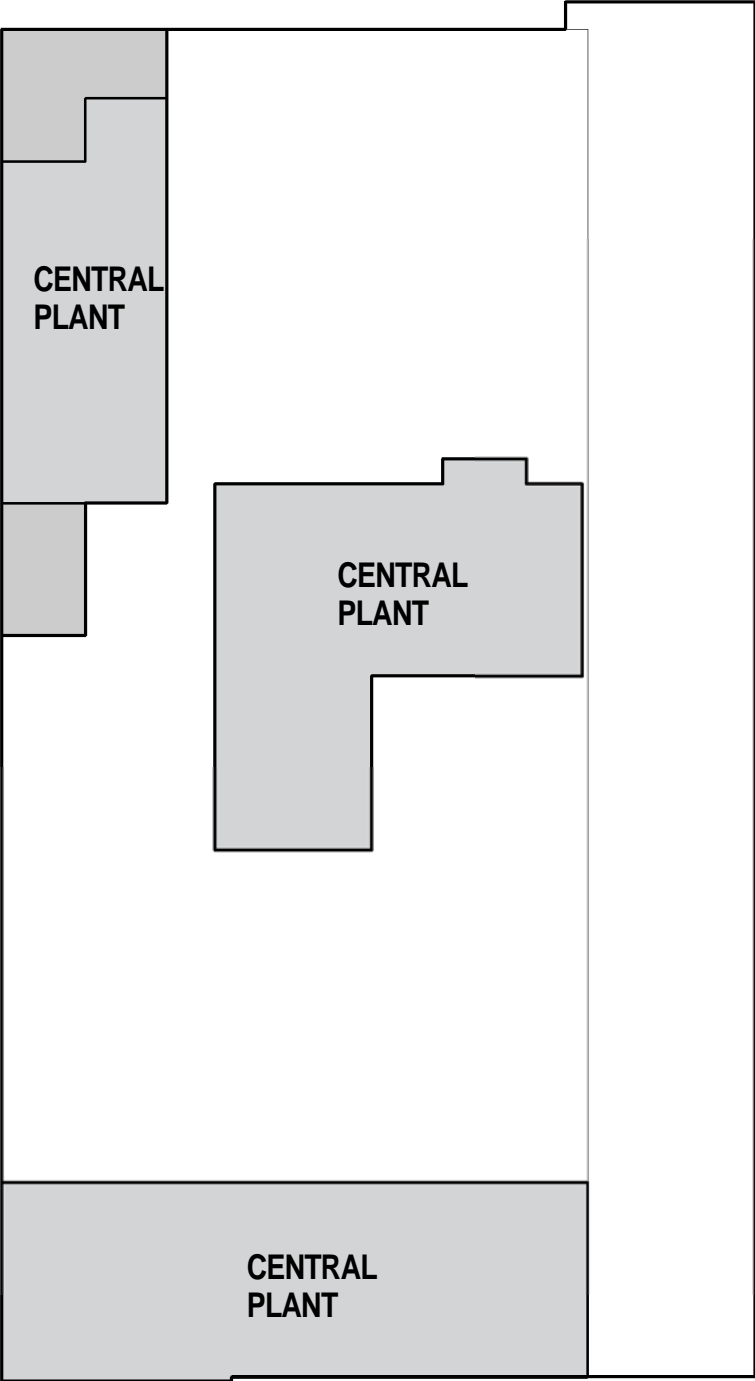
ST LUKE'S CAMPUS - HOSPITAL

SMITHGROUPJJR / BOULDER ASSOCIATES

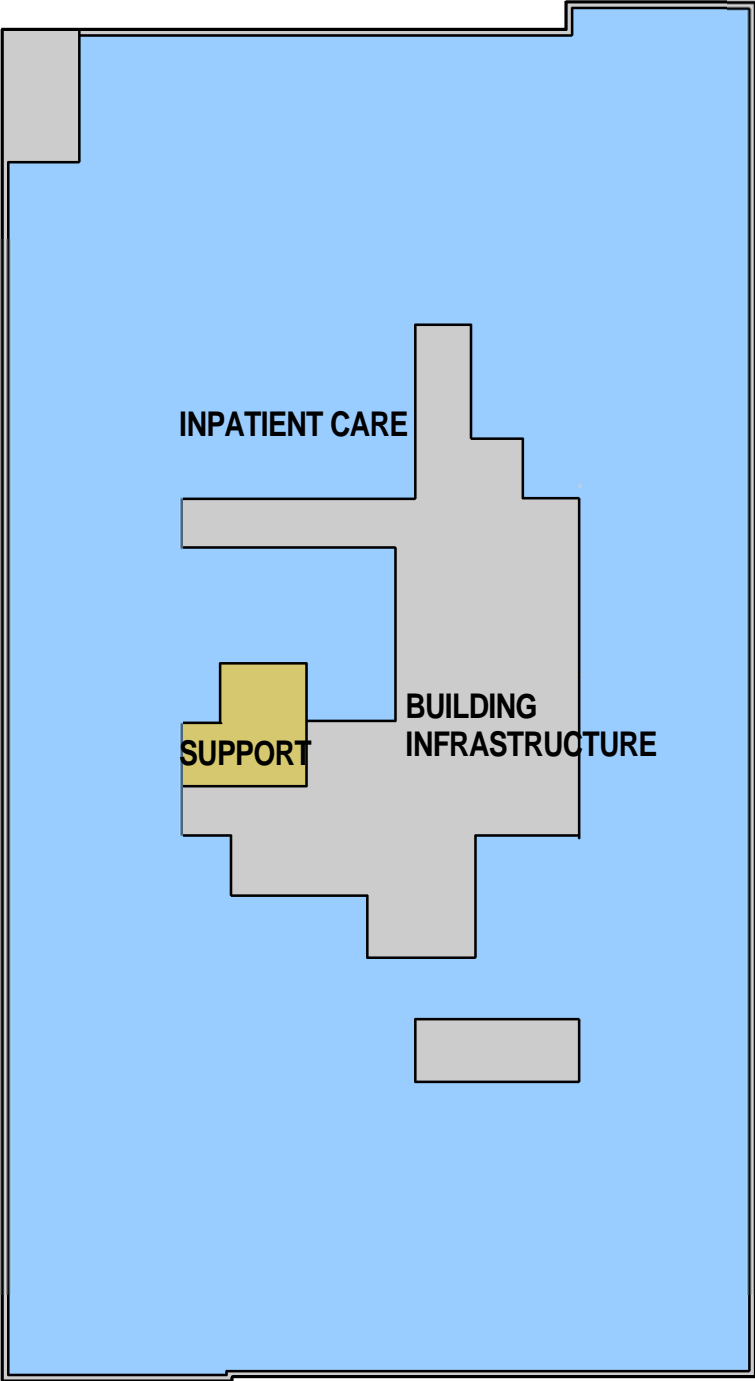
CPMC LRDP Revised Project

CPMC LONG RANGE DEVELOPMENT PLAN

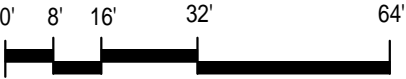
Figure 1-38: St. Luke's Hospital - Level 7 & Roof



St Luke's Hospital - Roof Level



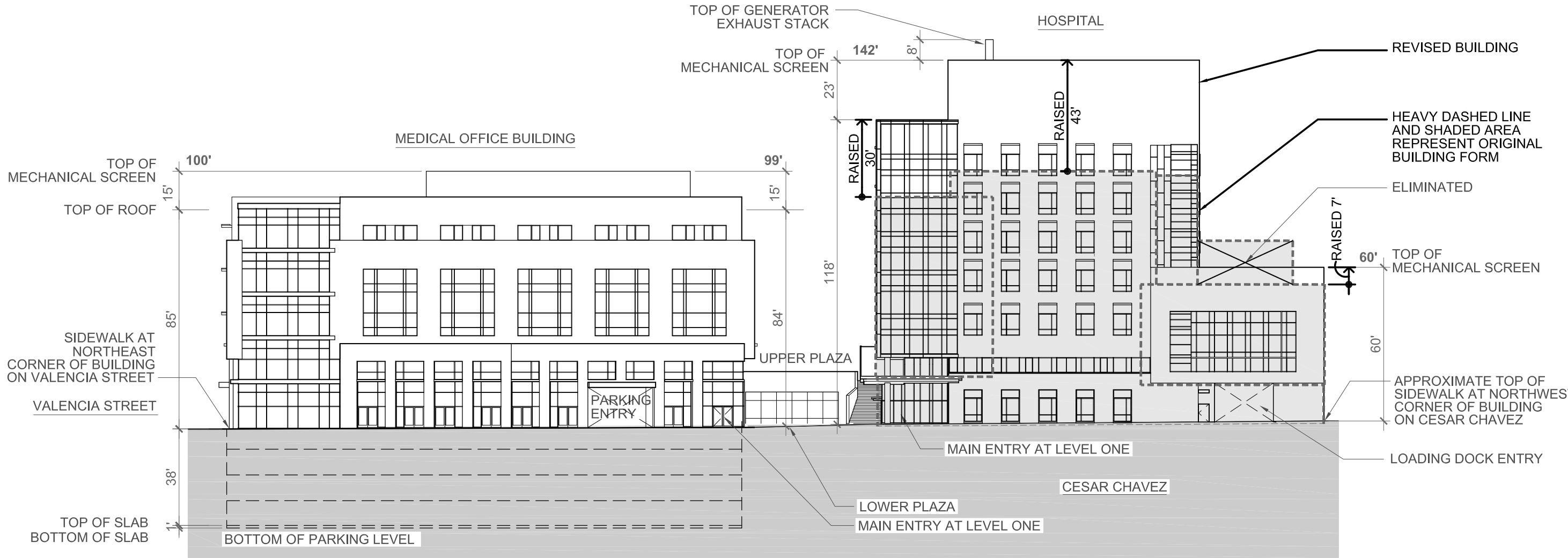
St Luke's Hospital - Level 7



GRAPHIC SCALE: 1/32" = 1'-0"



Figure 1-39: North Elevation Comparison of Revised Project to Previous Project



NORTH ELEVATION

- NOTES:
1. BUILDING HEIGHTS SHOWN ARE APPROXIMATE
 2. BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT LOCATIONS INDICATED

APPROXIMATE SCALE

0 5' 10' 20' 40'

Figure 1-40: East and West Elevation Comparison of Revised Project to Previous Project

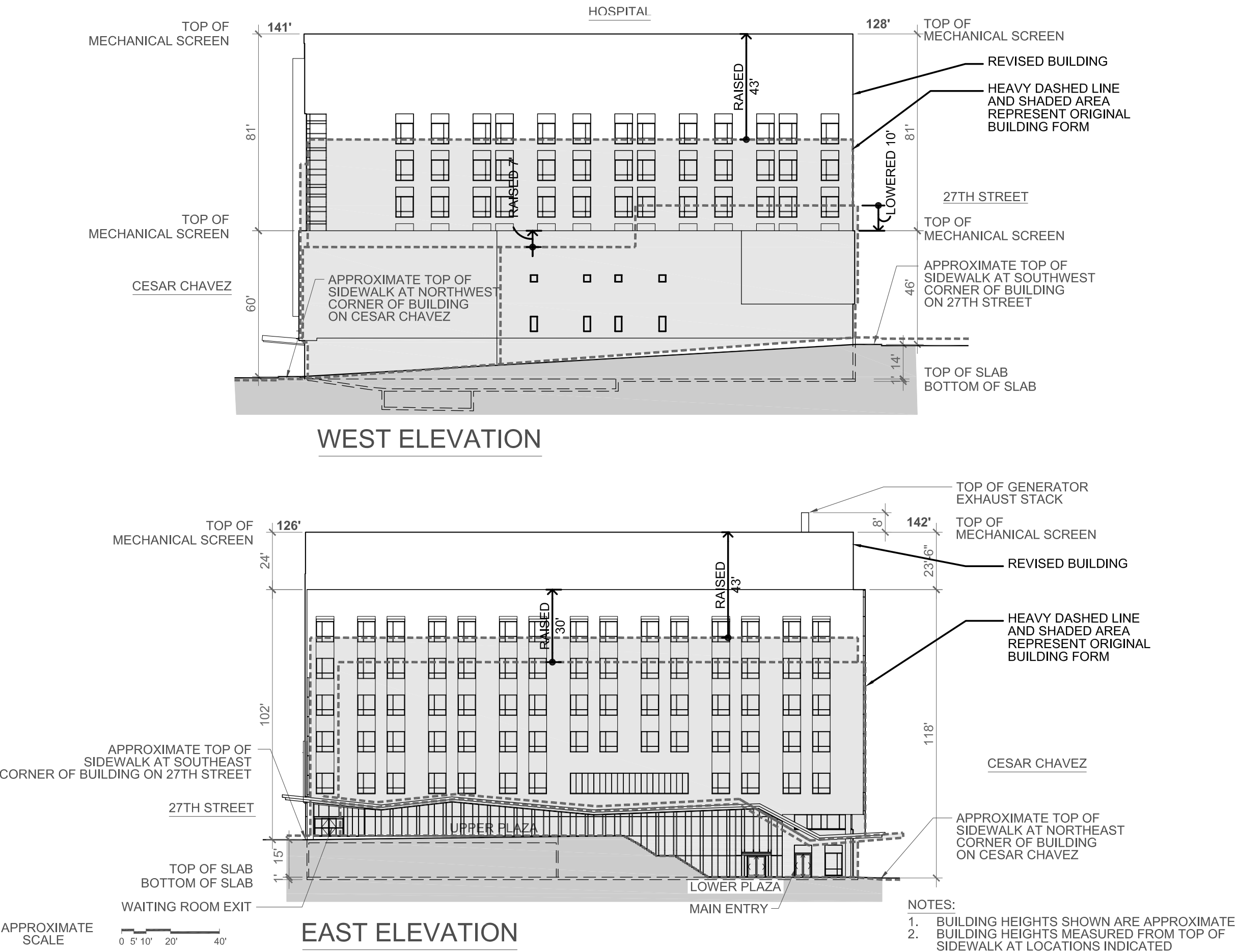
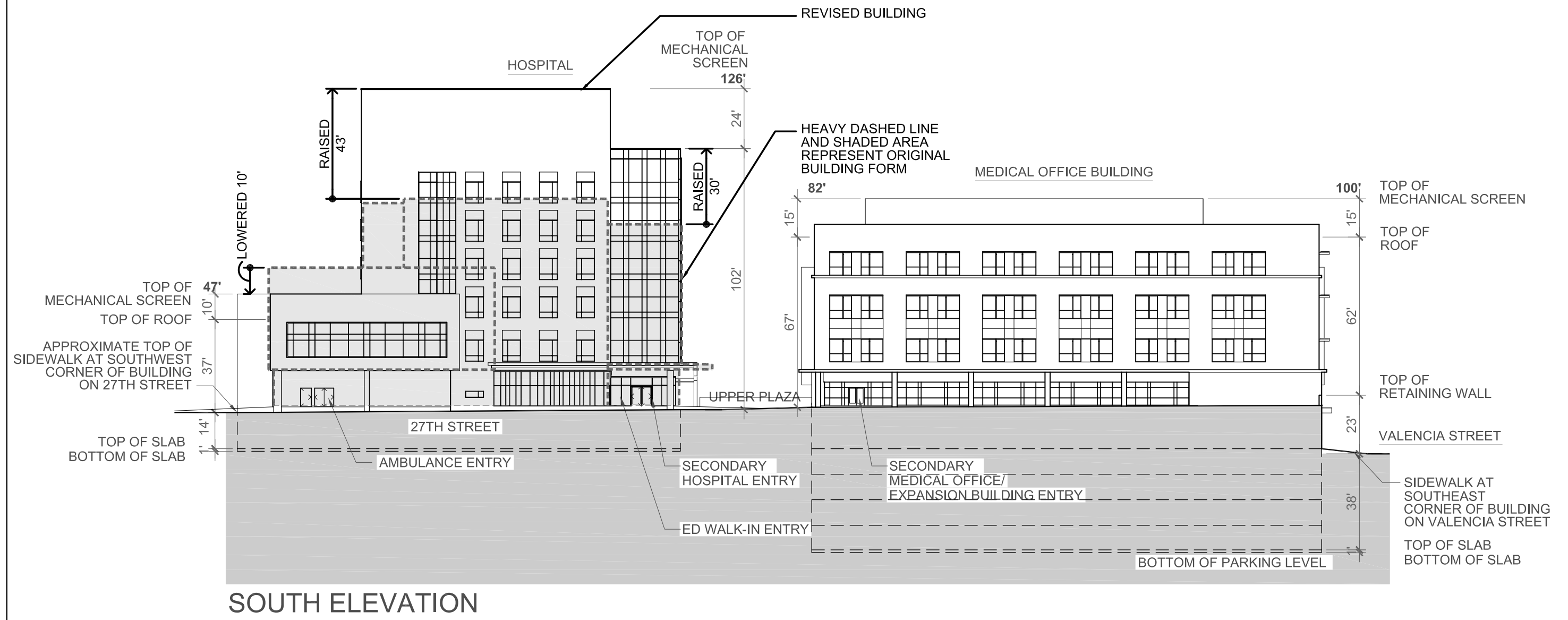


Figure 1-41: South Elevation Comparison of Revised Project to Previous Project



- NOTES:
1. BUILDING HEIGHTS SHOWN ARE APPROXIMATE
 2. BUILDING HEIGHTS MEASURED FROM TOP OF SIDEWALK AT LOCATIONS INDICATED

APPROXIMATE SCALE

0 5' 10' 20' 40'