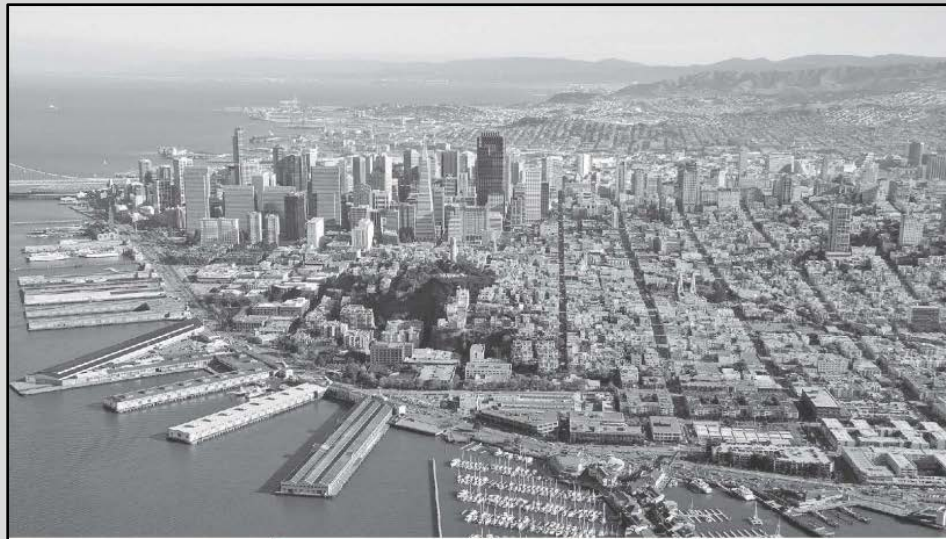


San Francisco Planning Department Environmental Review Guidelines Training Workshop

November 8, 2012



Welcome!



PLANNING DEPARTMENT

ENVIRONMENTAL PLANNING DIVISION



SAN FRANCISCO
PLANNING
DEPARTMENT

Environmental Review Guidelines

October 5, 2012



Goals of Training

- Highlight what's new
- Clarify recurring areas of confusion
- Get staff and consultants on same page
- Provide opportunity for questions and feedback
- Improve guidelines
- *Not* a detailed walk through
- Assume prior review of EP Guidelines and knowledge of CEQA

Agenda

- 9:30 Introduction
 - 9:40 Overview
 - 9:50 General Requirements
 - 10:00 Project Management
 - 10:10 Initial Studies
 - 10:30 Questions
 - 10:40 Break
 - 10:50 Negative Declarations
 - 11:00 EIRs
 - 11:30 Questions
 - 11:50 Adjourn
- (Please move to Room 403 after 11:50)

Presenters

- Environmental Planning, Senior Environmental Planners

Lisa Gibson, (415) 575-9032, lisa.gibson@sfgov.org

Sarah Jones, (415) 575-9034, sarah.jones@sfgov.org

Joy Navarrete, (415) 575-9040, joy.navarrete@sfgov.org

Rick Cooper, (415) 575-9027, rick.cooper@sfgov.org

Devyani Jain, (415) 575-9051, devyani.jain@sfgov.org



Who's Here Today?

- Planning Director
- Environmental Planning staff
- Current Planning preservation staff
- Consultant pool staff
 - Environmental
 - Transportation
 - Historic
 - Archeology

Introduction



Purpose of EP Guidelines

- Provide clear and consistent guidance
- Establish requirements for E review in SF
- Explain procedural and content requirements for IS's, NDs/MNDs, and EIRs
- Clarify who does what – consultants vs. staff
- Assist in preparation of useful, organized, consistent, and legally adequate documents in timely and cost-effective manner
- Primarily for staff and consultants
- Important reference for preparing SOWs

Limitations of EP Guidelines

- Not exhaustive
- Does not reflect all requirements of CEQA, Chap 31, Department internal procedures
- Snapshot in time

Applicability of EP Guidelines

- EE Applications Filed on or after October 5, 2012:
 - 100%
- EE Applications Filed before October 5, 2012:
 - Fully for any admin draft docs not yet produced/actions not yet taken
 - To maximum extent practicable for docs in production

Applicability of EP Guidelines

- For addenda, CPEs, joint CEQA/NEPA docs, and other types of CEQA docs, to maximum extent practicable
- For tech studies, all applicable portions:
 - Chapter 1, Introduction
 - Chapter 2, Overview of Environmental Review Process
 - Chapter 3, Initial Studies, Section 3.1.1, Technical Studies
 - Chapter 5, EIRs, 5.1.2, Technical Studies
 - Chapter 6, General Requirements
 - Chapter 7, Project Management



Exceptions to EP Guidelines

- Granted only in exceptional circumstances
- Examples of what would require an exception:
 - Submitting ADEIR-1 without the Summary section
 - Submitting ADEIR-1 based on admin draft of tech study (e.g., TIS-1 or HRE-1)
- Written authorization required
 - EP Guidelines Exception Agreement

EP Guidelines Exception Agreement



SAN FRANCISCO PLANNING DEPARTMENT

APPENDIX A

EP Guidelines Exception Agreement

Date: [Date]
 Case No. 20XX.XXXE
 Project Address: [Project Address/Title]
 Block/Lot: [xxxx/xxx]
 City and County: San Francisco
 Project Sponsor: [Name]
 CEQA Consultant: [Name], [Firm]
 EP Environmental Coordinator: [Name]
 EP Supervisor: [Name]

1650 Mission St.
Suite 400
San Francisco,
CA 94103-2479

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

PURPOSE

This agreement between the CEQA consultant and the Planning Department environmental coordinator for the above project establishes the allowable exceptions to Environmental Planning's *Environmental Review Guidelines* (EP Guidelines) for the above project. The agreement specifies the extenuating circumstances that warrant such exceptions. Deviations from the EP Guidelines shall not occur unless specified in this agreement.

PRIMARY CEQA DOCUMENTS TO BE PREPARED

[DELETE ALL THAT DO NOT APPLY; AMEND AS NECESSARY]

ND/MND

- PND/PMND, Initial Study Attached
- FND/FMND, Initial Study Attached
- MMRP
- PND/PMND Appeal Packet
- FND/FMND Appeal Packet

EIR

- Notice of Preparation, Initial Study Attached
- Notice of Preparation, No Initial Study Attached
- Initial Study, subsequent to Notice of Preparation
- Draft EIR
- Comments and Responses Document
- Final EIR
- MMRP
- EIR Appeal Packet

Other (Specify): _____

EP Guidelines Exception Agreement
[Date]

Case No. 20XX.XXXE
[Project Address/Title]

EXCEPTIONS

The consultant will adhere to the EP Guidelines for all of the deliverables, with the following exceptions, for the reasons stated below.

[EXPLAIN EXCEPTIONS AND THE EXTENUATING CIRCUMSTANCES THAT WARRANT SUCH EXCEPTIONS]s

AGREEMENT

I agree to the above terms regarding compliance with the EP Guidelines for the proposed project.

CEQA Consultant Signature

Date

EP Environmental Coordinator Signature

Date

EP Supervisor Signature

Date

Consultant Resources

- EP Guidelines, forms, and templates
- Consultant Resources page of Planning Department website
<http://ep.sfplanning.org>
- Visit frequently to check for updates
- Note date of document to ensure most use of most current version

Consultant Resources

SAN FRANCISCO PLANNING DEPARTMENT

Search

Home | About Us | Plans & Programs | Permits & Zoning | Enforcement | Public Hearings | Resource Center

Plans & Programs

- Complete List of Plans and Projects
- The City's General Plan
- Citywide Planning
- Environmental Planning**
- Historic Preservation
- Legislative Changes
- Special Projects
- General Advertising Sign Program

Popular Topics

- Public Hearing Agendas**
Looking for the most recent
• Planning Commission Agenda
• Historic Preservation Commission Agenda
• Variance Hearing Agenda
- San Francisco Property Information Map**
Public Access to Useful Property Data & Resources at the Clerk of a Mouse [go »](#)

Events & Hearings

- Variance Hearing**
Wed, Oct 24, 2012 at 9:30am @ City Hall, Commission Chambers - Room 408
- Haight Ashbury Public Realm Plan Community Meeting**
Wed, Oct 24, 2012 from 6:00pm - 7:30pm @ The Urban School of San Francisco
- Planning Commission Hearing**
Thu, Oct 25, 2012 at 12:00pm @ City Hall, Commission Chambers - Room 400
- Planning Commission Hearing**
Thu, Nov 1, 2012 at 12:00pm @ City Hall, Commission Chambers - Room 400

Plans & Programs

- Green Connections**
Green Connections will increase access to parks, open space and the waterfront by re-envisioning City streets as 'green connectors'. [more »](#)
- The Central Corridor Project**
Develop a community vision for the southern Central Subway rail corridor that runs from Market to King Street along 4th Street and neighboring areas. [more »](#)
- Pavement to Parks Program**
This program seeks to temporarily reclaim swatches of land and quickly and inexpensively turn them into new public plazas and parks. [more »](#)

view Complete List of Plans & Programs

SIGN UP FOR EMAIL ALERTS

Enter email address

Finish sign-up on next page.

Planning News [RSS](#)

- Take Our Survey on the draft Green Connections Network**
Sunday, October 21, 2012
- Career Opportunity: Senior Business Analyst**
Thursday, October 18, 2012
- Environmental Review Guidelines Released**
Sunday, October 14, 2012
Updated to standardize and streamline environmental review process
- Pipeline Report Survey**
Tuesday, October 09, 2012
Planning Department seeking feedback on Pipeline Report
- Draft Map of City's 'Green Connections' Presented**
Wednesday, October 03, 2012
Program designed to promote active transportation and greater access to parks identifies over 140 miles of 'green connectors' throughout San Francisco

SAN FRANCISCO PLANNING DEPARTMENT

Search

Home | Plans & Programs | Environmental Planning

Environmental Planning

TEXT | FONT SIZE | A | A

ON THIS PAGE

- WHAT IS ENVIRONMENTAL REVIEW?
- WHAT IS SUBJECT TO ENVIRONMENTAL REVIEW?
- CURRENT DOCUMENTS FOR PUBLIC REVIEW
- ENVIRONMENTAL REVIEW PROCESS
- GLOSSARY

HOW DO I?

- FIND OUT IF ENVIRONMENTAL PLANNING HAS ANY OPEN RFPS & RFQS?
- FIND HELPFUL RESOURCES FOR CONSULTANTS?
- LEARN MORE ABOUT GREENHOUSE GAS REDUCTION STRATEGIES

NEWER GUIDELINES!

Environmental Review Guidelines

Plans & Programs

- Complete List of Plans and Projects
- The City's General Plan
- Citywide Planning
- Environmental Planning**
 - Negative Declarations & EIRs
 - SFPUC Negative Declarations & EIRs
 - Area Plan EIRs
 - CEQA Community Plan Exemptions
 - CEQA Exemptions
 - Requests for Qualifications and Proposals (RFQs and RFPs)
 - Consultant Resources**
 - Greenhouse Gas Reduction Strategies
- Historic Preservation
- Legislative Changes
- Special Projects
- General Advertising Sign Program

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What is Environmental Review?

The Environmental Planning Division of the Planning Department reviews projects for potential environmental impacts on the City of San Francisco and its residents, a process known as environmental review.

Reviews are conducted pursuant to the California Environmental Quality Act (CEQA), Chapter 31 of the [San Francisco Administrative Code](#), which provides guidelines for implementing the CEQA process. The reviews identify any potential adverse environmental effects of proposed actions, assesses their significance, and proposes measures to eliminate or mitigate significant impacts. Only certain smaller-scale actions identified by the state, known as Categorical Exemptions, are exempt from environmental review.

What is subject to Environmental Review?

Most development, infrastructure and transportation projects, proposed regulatory changes, and permitting applications are subject to the "environmental review process."

- Local industrial, commercial, mixed use and residential developments or redevelopments
- Local and regional transit and transportation projects

Consultant Resources

Document Templates and Checklists

Document	Date
Initial Studies	
Initial Study Checklist ↗	10/5/12
Initial Study Table of Contents ↗	10/5/12
Mitigated Negative Declarations	
Notification of Project Receiving Environmental Review ↗	10/5/12
PMND Cover Page ↗	10/5/12
Notice of Availability of and Intent to Adopt a MND ↗	10/5/12
Notice of Completion ↗	January 2008
Agreement to Implement Mitigation Measures ↗	10/5/12
Affidavit of Mailing ↗	10/5/12
FMND Cover Page ↗	10/5/12
Mitigation Monitoring and Reporting Program ↗	10/5/12
PMND Appeal Packet Transmittal Memorandum ↗	09/10/08
PMND Appeal Executive Summary ↗	09/10/08
PMND Appeal Motion ↗	09/10/08
PMND Appeal Exhibit A ↗	09/10/08
Environmental Impact Reports	
Notice of Preparation of an EIR ↗	10/5/12
Notice of Availability of the NOP ↗	10/5/12
Notice of Availability of a DEIR ↗	10/5/12
Notice of Completion ↗	January 2008
DEIR Cover ↗	10/5/12
DEIR Distribution Notice ↗	10/5/12
DEIR Table of Contents ↗	10/5/12
Summary of Impacts of Proposed Project ↗	10/5/12

Initial Study

Project Address/Title
Planning Department Case No. 20XX.XXXXE

A. PROJECT DESCRIPTION

B. PROJECT SETTING

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	Applicable	Not Applicable
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

<input checked="" type="checkbox"/> Land Use	<input type="checkbox"/> Air Quality	<input type="checkbox"/> Biological Resources
<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Geology and Soils
<input type="checkbox"/> Population and Housing	<input type="checkbox"/> Wind and Shadow	<input type="checkbox"/> Hydrology and Water Quality
<input type="checkbox"/> Cultural and Paleontological Resources	<input type="checkbox"/> Recreation	<input type="checkbox"/> Hazards/Hazardous Materials
<input type="checkbox"/> Transportation and Circulation	<input type="checkbox"/> Utilities and Service Systems	<input type="checkbox"/> Mineral/Energy Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Public Services	<input type="checkbox"/> Agricultural and Forest Resources
		<input type="checkbox"/> Mandatory Findings of Significance

Case No. 200000000E

1

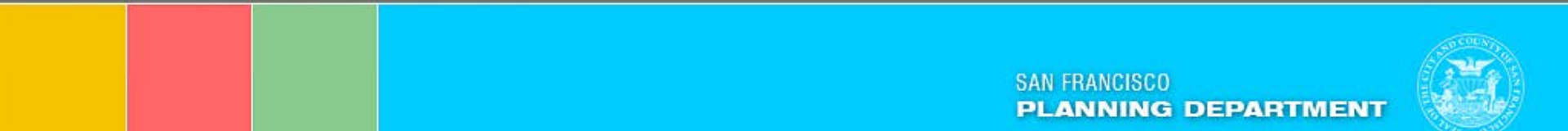
Project Address/Title

Revised 10/5/12

Revised 10/5/12



Overview of the Environmental Review Process



Preliminary Project Assessment

- 6 or more dwelling units or >10,000 sf of non-residential space
- Early feedback before EE and entitlement applications are submitted
- Screening-level E analysis
- Determination of tech studies needed, data required, and likely level of E review
- PPA letter valid for 18 months



Preliminary Project Assessment

- Sponsor must file a EE Application within 18 months of PPA letter issuance
- Tech studies requiring consultant pool resources may not proceed until EE Application is filed

Environmental Evaluation

- Filing EE Application
 - Can occur concurrently with entitlement application filing, but not after
 - Case is assigned to EP environmental coordinator and other E team members

Environmental Evaluation

- E Review Team
 - Planning Department – Environmental Planning
 - Environmental coordinator
 - Senior environmental planner
 - Environmental review officer
 - Archeology specialist
 - Transportation specialist
 - Transportation coordinator
 - Air quality specialist

Environmental Evaluation

■ E Review Team

- Planning Department – Current Planning
 - Current planner
 - Preservation specialist
 - Shadow specialist
- Other Agencies: SFDPH, SFMTA, SFPUC
- City attorney
- Project sponsor
- Consultant

Environmental Evaluation

- Finalization of Project Description
 - First step of E review process
 - Goal: Clear and stable project description at sufficient detail for E review
 - E review shall not proceed beyond review of project description until sponsor files entitlement applications
- Changes to Project Description
 - Must be communicated promptly to all members of the City E and entitlement application team reviewers

Environmental Evaluation

- Use of Consultants and EP Staff
 - Consultants are required to prepare EIRs and technical studies, and may be hired to prepare exemptions and MNDs
 - Consultants work at the direction of EP

Consultant Selection

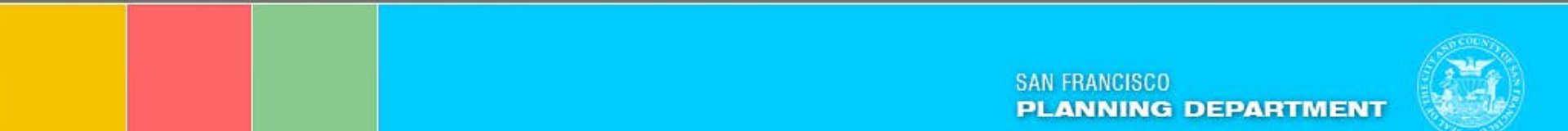
- Consultant Pool Managers
 - Environmental: Sarah Jones, (415) 575-9304
 - Transportation: Viktoriya Wise, (415) 575-9049
 - Historic resources: Tina Tam, (415) 558-6325
 - Archeological resources: Randall Dean, (415) 575-9029
- Performance Standards
 - Must be included in contracts



Consultant Objectivity

- To avoid conflict of interest, consultants:
 - Remain neutral, objective, and unbiased
 - Represent project sponsor and perform non-environmental services only with E coordinator permission
 - Discuss changes to analysis or conclusions with sponsor only with E coordinator's consent
- OK for consultants to communicate with sponsor about contracting, project description, and formulating mit measures and alts

General Requirements



Administrative Draft Documents

- Document Submission
 - All sections must be complete
 - Partial drafts require written exception and additional admin draft doc
 - Minimum of 2 complete admin drafts and screen check of doc in its entirety
 - Technical reports and other data sources must be final

Administrative Draft Documents

■ Format

- Both hard and electronic of entire doc
- Copy of transmittal letter with each doc
- Revised docs in both clean and redline
- Electronic copies in native format and PDF

Administrative Draft Documents

- Distribution and Number of Copies
 - E coordinator determines number and recipients
 - Submit directly to E coordinator unless otherwise instructed
 - OK for sponsor and other team members to receive admin draft docs at same time as E coordinator
 - Copy E coordinator on all transmittals

Administrative Draft Documents

■ Review

- No prior review by sponsor or other E team members
- Exceptions for review of tech portions of CEQA docs by tech consultants
- Comments submitted to E coordinator
- Consultant shall not accept comments directly from others
- E coordinator will review team comments as time allows before forwarding to consultant
- OK for sponsor to see comments

Administrative Draft Documents

- Revision – Consultant shall:
 - Immediately review comments and flag comments requiring follow up
 - Resolve outstanding issues prior to submittal of revised document
 - Use track changes
 - Annotate original comments
 - Prepare transmittal letter identifying comments, explaining comments not addressed/not obviously addressed, changes not in response to comments, and issues requiring attention/resolution

Administrative Draft Documents

- Number of Rounds of Review
 - Typically:
 - 2 admin drafts + screencheck
 - Final “print check” for documents signed by ERO
 - As many as are needed to achieve doc approved by E coordinator and ERO, as applicable

Final Documents

- Submission

- Mostly same requirements as admin draft docs
- Electronic file in searchable PDF for website posting of PMNDs, DEIRs, C&Rs (and addenda)

Rejection of Submittals

- Last resort
- EP may reject deliverables that do not adhere to EP Guidelines
- Consultant Feedback Letter
- Mandatory meeting to agree upon solutions
- Possible consequences: skip pool rotation, removal from pool, factor in future pool eligibility

Reference and Background Materials

- Cited materials must be reasonably available in project file, at public libraries, and/or on Internet
- Technical memoranda shall document data or methodologies not otherwise explained in tech study
- Cited materials shall be submitted with associated deliverable, unless previously submitted
- Print out Internet info on day accessed
- Organize by topic

Administrative Record

- Includes:
 - EE Application
 - Published CEQA documents
 - Hearing transcripts
 - Public notices
 - Written comments from public and agencies (not on admin draft documents)
- Hard and electronic copies due prior to publication of PMND, NOP/IS, DEIR
- Update as needed with publication of FMND, RTC, or appeal packet



Project Management



Introduction

- New section of EP Guidelines
- Goals
 - Quality deliverables within scope and budget
 - Communicate expectations
 - Accommodate changing circumstances appropriately

Project Activities

1. Project Initiation
2. Ongoing Project Activities
3. Evaluation

Project Initiation

- Scope of work
 - Informed by PPA letter
 - Requires E coordinator approval
 - Associated with project kick-off meeting
- Schedule
 - Companion to SOW
- QA/QC plan

Project Schedule

- Consultant responsibility
- Tasks/deliverables
 - Identify relationships
- Timeline for project execution
 - Adequate time for consultant work and standard assumptions and review times (p 7-6/7, Tables 7-1 and 7-2)
- Goal is agreement on key milestones prior to starting work and establishment of common expectations

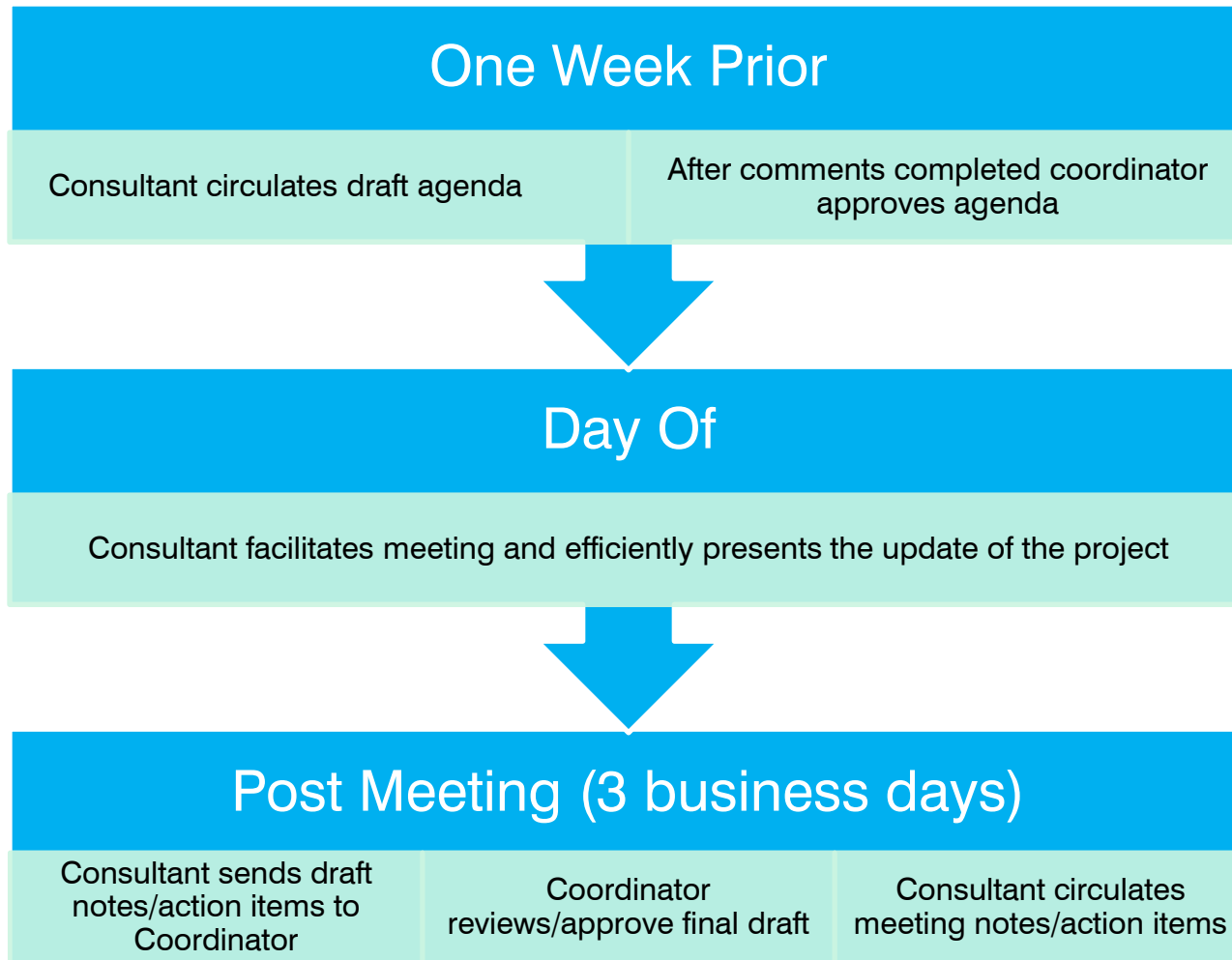
Project Schedule

- Provides baseline for tracking progress
- Account for individual circumstances and contingencies (technical study submittal)
- At minimum submit the first admin draft doc no later than 6 months after the consultant SOW is finalized
- Second draft no later than 6 months after the receipt of comments on first admin draft

Ongoing Project Activities

- Meetings
- Monitoring progress
- Quality assurance/quality control

Meeting Preparation and Follow Up



Monitoring Progress

- Schedule updates
- Maintaining timeline for submittals
 - Notify project team of any late submittals
 - Strategize solutions for overall schedule
 - Retaining Planning Department review times

Quality Assurance and Quality Control

- Professional quality and technical accuracy of all deliverables
 - Meets all legal requirements as advised by the coordinator
 - Accurate, complete and objective, well organized, logical, concise, comprehensible to the lay reader
 - Free from errors and omissions
- Consultant's Checklist for Document Submittal (Appendix J)
- QA/QC Plan (Appendix D)

Consultant's Checklist

SAN FRANCISCO PLANNING DEPARTMENT CONSULTANT CHECKLIST FOR DOCUMENT SUBMITTAL

File Number: _____

Project Title: _____

This checklist must be filled in by the consultant and a signed copy must accompany each administrative draft document submitted to Environmental Planning (EP). Exceptions to any checklist item must be approved in advance. Items that are not applicable should be marked "NA" (not applicable) with an explanation. If any of the items are not addressed, the document may be returned unread for revision and resubmittal.

- _____ 1. Document complies with EP's *Environmental Review Guidelines*.
- _____ 2. Document has not been reviewed by sponsor, sponsor's representatives, or other environmental team members in advance of submittal to EP.
- _____ 3. Transmittal sent to others instructs that comments are to be submitted to EP.
- _____ 4. Document is edited for grammatical and typographical errors, clarity, and format.
- _____ 5. Document is neutral in tone and does not advocate the project.
- _____ 7. Document cover/first page identifies the number of the draft (e.g., 1, 2, 3), project number and title, date of submittal, and State Clearinghouse Number, if applicable.
- _____ 8. Each page contains header or footer stating "Administrative Draft - Subject to Change" (except for the final print check).
- _____ 9. All document sections, tables, figures, appendices, etc. are submitted.
- _____ 10. Footnotes are on same page as the reference (no endnotes).
- _____ 11. Tables and figures are checked for accuracy, figures include a north arrow, each table and figure includes a source.
- _____ 12. Text references to tables, figures, and to other text refer to the correct pages, tables, figures, or text.



QA/QC Plan

[Project Address / Title]

[20XX.XXXE]

Quality Assurance/Quality Control Plan

This is the Quality Assurance/Quality (QA/QC) Control Plan for the [INSERT PROJECT NAME] Project. To assure a high level of professional quality and technical accuracy of deliverables, [INSERT PROJECT CONSULTANT MANAGER NAME], will act as overall QA/QC Manager who will ensure that the QA/QC plan has been implemented and will sign off on all major deliverables.

QA/QC TEAM

The QA/QC Team includes the document authors, the QA/QC Manager, the Technical Reviewer(s), and the Technical Editor. The responsibilities of each QA/QC Team member are listed below. The timing of each of the various QA/QC reviews is shown on the attached *QA/QC Plan: Deliverable Review Timeline*. The overall quality achieved on a project is determined by the quality of the work produced by the individual project team members. Each project team member is responsible for the quality of his or her contribution to the project. As each step towards developing a project deliverable (draft chapter, etc.) is completed, the project team member should carefully check for accuracy and completeness before submitting the product to the next-level reviewer.

QA/QC MANAGER

The QA/QC Manager is responsible for the quality of the document delivered to the client. The QA/QC Manager is responsible for:



Consultant Evaluation

- Consultant Evaluation Form
 - Completed by environmental coordinator after review of each administrative draft
 - Feedback mechanism for consultants
- Feedback Letter
 - In event of unsatisfactory performance
 - Opportunity to identify solutions

Initial Studies



Initial Study Procedures

- SF Initial Study Checklist
 - Modified version of Appendix G of CEQA Guidelines
- Rarely published as stand-alone document
- Most commonly published with ND or NOP

Initial Study Procedures: Tech Studies

- PPA process determines studies needed
- Adhere to applicable consultant pool protocols (transpo, historic, archeo)
- New:
 - With exception of TIS's, no CEQA significance determinations
 - No mit measures; measures to reduce project impacts OK
 - Significance determinations made by Planning Department

Initial Study Contents: TOC

- Cover Page
- Table of Contents
- Project Description
- Project Setting
- Compatibility with Zoning and Plans
 - Only conflicts with adopted plans and goals of the City or region shall be discussed
- Summary of Environmental Effects

Evaluation of Environmental Effects

- Impact evaluation responds to each of the IS checklist questions by describing direct and indirect adverse impacts
- Impact statements are keyed to a subject area abbreviation (IS checklist topics and impact number)
- Mit measures are keyed with combined alpha-numeric code with “M” (may result in non-consecutive numbered MMs)

TABLE 3-1
IMPACT, MITIGATION MEASURE, AND IMPROVEMENT MEASURE PREFIXES

Subject Area	Impact Prefix	Mitigation Measure Prefix	Improvement Measure Prefix
Land Use and Land Use Planning	LU-	M-LU-	I-LU-
Aesthetics	AE-	M-AE-	I-AE-
Population and Housing	PH-	M-PH-	I-PH-
Cultural and Paleontological Resources	CP-	M-CP-	I-CP-
Transportation and Circulation	TR-	M-TR-	I-TR-
Noise	NO-	M-NO-	I-NO-
Air Quality	AQ-	M-AQ-	I-AQ-
Greenhouse Gas Emissions	GG-	M-GG-	I-GG-
Wind and Shadow	WS-	M-WS-	I-WS-
Recreation	RE-	M-RE-	I-RE-
Utilities and Service Systems	UT-	M-UT-	I-UT-
Public Services	PS-	M-PS-	I-PS-
Biological Resources	BI-	M-BI-	I-BI-
Geology and Soils	GE-	M-GE-	I-GE-
Hydrology and Water Quality	HY-	M-HY-	I-HY-
Hazards and Hazardous Materials	HZ-	M-HZ-	I-HZ-
Mineral and Energy Resources	ME-	M-ME-	I-ME-
Agriculture and Forest Resources	AG-	M-AG-	I-AG-



Initial Study Impact Statements

No impact

Impact AE-1: The proposed project would not have a substantial adverse effect on a scenic vista. (No Impact)

Less than significant

Impact AE-1: The proposed project would not have a substantial adverse effect on a scenic vista. (Less than Significant)

Initial Study Impact Statements

Less than significant with mitigation

Impact AE-1: The proposed project would have a substantial adverse effect on a scenic vista. (Less than Significant with Mitigation)

Potentially significant

Impact AE-1: The proposed project would have a substantial adverse effect on a scenic vista. (Potentially Significant Impact)

Mitigation Measures

- Introduce the mit measure following impact statement
- Example:

[Description of impact.] Therefore, the proposed project would result in a substantial adverse change in the significance of a historical resource, which is a significant impact. Implementation of Mitigation Measure M-CP-2a, HABS-Level Recordation, and Mitigation Measure M-CP-2b, Interpretive Display, below, would reduce the magnitude of this impact to a less-than-significant level.

Mitigation Measures

- Placed immediately following the related impact statement
- Similar numbering as impact statement
- Example:

Mitigation Measure M-CP-2a – HABS-Level Recordation. [Description of mitigation measure.]

Mitigation Measure M-CP-2b – Interpretive Display. [Description of mitigation measure.]

Improvement Measures

- Placed after mit measures under a separate subheading
- Similar numbering as impact statement
- Example:

Improvement Measure I-TR-1: North Point Street Traffic Signal Timing [Description of improvement measure.]

With or without implementation of Improvement Measure I-TR-1, transit delay on North Point Street would be less than significant.

Cumulative Impacts Analysis

- Define relevant area affected and explain basis
- If using list approach, identify past, present, and probable future projects that might result in related impacts
- Determine whether proposed project and other projects contribute to a significant cumulative impact (*without* taking mitigation into account)
- If significant cumulative impact, determine if proposed project's incremental effect is cumulatively considerable (*without* mitigation)

Cumulative Impacts Analysis

- If cumulatively considerable contribution, identify mitigation
- Unacceptable to state no significant cumulative impact since the project's impacts are LTS (though okay if project would have *no impact*)

Cumulative Impact Example

- **Impact C-TR-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a cumulatively considerable contribution to a significant transportation impact. (Less than Significant)**

[Description of cumulative impact]

Questions and Comments?



Questions and Comments

- We value your feedback on the training and the EP Guidelines!
 - Offer now
 - Fill out feedback form
 - Submit to Lisa Gibson at lisa.gibson@sfgov.org or (415) 575-9032



Break

Resume at 10:50 AM

Negative Declarations



Neg Dec Procedures

- Consultant and E coordinator work together to determine scope and content of MND, either by phone or in person
- Consultant submits draft SOW and draft QA/QC Plan for review and approval
- E coordinator may require a kick-off meeting
- Distribution list and radius map should be submitted to E coordinator, but **not labels**

Neg Dec Procedures

- Draft Agreement to Implement Mitigation Measures and draft MMRP should be submitted with draft PMND-2
- When ready for PMND publication, E coordinator determines publication date, places newspaper ad, files NOA, and sends distribution list to consultant
- Responsible, trustee agencies and State Clearinghouse, as applicable, sent document by certified mail or equivalent
- Consultant posts notice and provides affidavit of posting and photos at end of notice period

Neg Dec Procedures

- PMND may be appealed to Planning Commission
- FMND may be appealed to Board of Supervisors
- If appealed, consultant reviews concerns and identifies potential responses
- Consultant and E coordinator agree on general approach and schedule
- E coordinator and other relevant City staff make presentation to BOS
- Consultant and relevant members of consulting team attend, as needed

Environmental Impact Reports – Procedures



EIR Initiation

- Consultant schedules initiation meeting with E coordinator
- Initiation meeting should include all preparers of relevant tech studies
- Consultant prepares draft scope, schedule, and QA/QC plan for approval
- Following authorization to proceed, E coordinator may call for kick-off meeting



Notice of Preparation

- NOP can be stand-alone or include an Initial Study
- Submit NOP-1 with NOA-1, Consultant Checklist and NOC-1, and draft Agreement to Implement Mitigation Measures
- If public scoping meeting, consultant/sponsor arrange location, stenographer, and materials
- After scoping meeting, consultant provides draft transcript, final transcript, and draft scoping comments summary

DEIR

- Prior to preparing ADEIR-1, consultant and E coordinator agree on the approach to analysis and prelim list of alts
- With ADEIR-1, consultant submits draft NOA, draft NOC and Consultant Checklist
- Drafts of Agreement to Implement Mitigation Measures and MMRP are submitted with ADEIR-2
- E coordinator determines publication date, places newspaper ad, files NOA, and sends distribution list to consultant

DEIR Publication

- Responsible, trustee agencies and State Clearinghouse, as applicable, sent doc by certified mail or equivalent
- Consultant posts notice and provides affidavit of posting and photos at end of notice period
- DEIR public review period begins day after newspaper notice is published
- Consultant attends DEIR hearing and arranges for court reporter

Responses to Comments on DEIR

- Consultant and E coordinator agree on approach to RTC and schedule
- E coordinator determines publication and cert hearing date
- Consultant distributes and provides Affidavit of Mailing
- Consultant and relevant tech specialists attend cert meeting
- Transcript of cert motion may be required
- Consultant may assist with preparation of portions of CEQA findings

FEIR

- FEIR may be appealed to Board of Supervisors
- If appealed, consultant reviews concerns and identifies potential responses
- Consultant and E coordinator agree on general approach and schedule
- E coordinator and other relevant City staff make presentation to BOS
- Consultant and relevant members of consulting team attend, as needed

Environmental Impact Reports - Content



Draft EIR Contents - Highlights

Summary

Project Description

Plans and Policies

Environmental Setting, Impacts and Mitigation

Alternatives

EIR Appendices: Appendix A:NOP mandatory, plus others

DEIR Summary

- Project Synopsis
- Summary Tables of Impacts and Mitigation and Improvement Measures
 - Summary of **all** impacts of project identified in Draft EIR
 - Summary of **only** significant Impacts of project identified in Initial Study
- Comparison table of significant impacts of the project and alternatives, including No Project Alternative
- Areas of known controversy and issues to be resolved

Summary of Impacts Matrix

**TABLE S-2
SUMMARY OF IMPACTS OF PROPOSED PROJECT**

Impact	Level of Significance before Mitigation	Mitigation and Improvement Measures	Level of Significance after Mitigation
Environmental Topic			
Impact statement, including alpha-numeric code.	Abbreviated level of significance before mitigation ("NI," "LTS," or "S")	Mitigation measure(s), improvement measure(s), or "None required."	Abbreviated level of significance after mitigation ("LTS," "SU," or "SUM") or "NA."
<i>Example:</i>			
Cultural and Paleontological Resources			
CP-1: The proposed project would result in the demolition of an individual historic architectural resource, causing a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.	S	<p>M-CP-1a: Documentation of a Historical Resource. To document the building more effectively, the project sponsor shall prepare Historic American Buildings Survey (HABS)-level photographs and an accompanying HABS Historical Report, which shall be maintained onsite, as well as in the appropriate repositories. The contents of the report shall include...</p> <p>M-CP-1b: Oral Histories. The project sponsor shall undertake an oral history project that includes interviews of people such as residents, past owners, or former employees. The project shall be conducted...</p> <p>M-CP-1c: Interpretive Program. The project sponsor shall work with a Historic Preservation Technical Specialist or other qualified professional to institute an interpretive program on-site...</p>	SUM
CP-2: The proposed project would cause a substantial adverse change in the significance of an archeological resource as defined in CEQA Guidelines Section 15064.5.	S	M-CP-2: Archeological Testing Plan. Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall...	LTS
CP-3: The proposed project would not disturb any human remains, including those interred outside of formal cemeteries.	NI	None required.	NA
C-CP-1: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5.	S	Implement M-CP-1a , Documentation of a Historical Resource; M-CP-1b , Oral Histories; M-CP-1c , Interpretive Program; and M-CP-2 , Archeological Testing Plan.	NA

Alternatives Matrix

TABLE S-X
COMPARISON OF SIGNIFICANT IMPACTS OF PROJECT TO
IMPACTS OF ALTERNATIVES

	Proposed Project	No Project Alternative	Alternative A: Title	Alternative B: Title
Description	Brief description of proposed project	Brief description of alternative	Brief description of alternative	Brief description of alternative
Ability to Meet Project Sponsor's Objectives	Brief summary of degree to which proposed project meets sponsor's objectives	Brief summary of degree to which alternative meets sponsor's objectives	Brief summary of degree to which alternative meets sponsor's objectives	Brief summary of degree to which alternative meets sponsor's objectives
Environmental Topic				
Sub-topic	Impact statement. (Level of significance in parentheses)	Brief summary of significance of alternative's unmitigated impact relative to proposed project. (Level of significance in parentheses)	Brief summary of significance of alternative's unmitigated impact relative to proposed project. (Level of significance in parentheses)	Brief summary of significance of alternative's unmitigated impact relative to proposed project. (Level of significance in parentheses)
<i>Example:</i>				
Cultural and Paleontological Resources				
Archeological Resources	Impact CP-4: The proposed project would cause a substantial adverse change in the significant of an archeological resource pursuant to CEQA Guidelines Section 15064.5. (SM)	No impact. (NI)	Substantially less than proposed project. (LTS)	Similar to but less than proposed project. (SM)

Legend

NI No impact
LTS Less than significant or negligible impact; no mitigation required
SM Significant but mitigable
SU Significant and unavoidable adverse impact, no feasible mitigation
SUM Significant and unavoidable adverse impact, after mitigation

Project Description

- Project Overview
- Project Objectives
 - City staff/EIR consultants review project sponsor's objectives
 - Ensure objectives not so narrowly defined to preclude analysis of a reasonable range of alternatives
- Project Location
- Project Characteristics
- Intended Uses of the EIR

Plans and Policies - Approach

- Discuss project's inconsistencies, if any, with plans and policies
- Do not discuss project's consistency with plans and Policies
- Do not list policies applicable to project
- If no project inconsistencies found, list plans reviewed and state no inconsistencies were identified
- If project inconsistencies identified, effect on subject resource to be addressed fully in appropriate "Environmental Impacts" subchapter in Chapter 4

Environmental Setting & Impacts: Intro

- New Amendments to CEQA Guidelines
- Format of Environmental Analysis – Terms for level of significance of impacts
 - No Impact
 - Less-Than-Significant Impact
 - Less-Than-Significant Impact with Mitigation
 - Significant and Unavoidable Impact with Mitigation
 - Significant and Unavoidable Impact
 - Do not use “Potentially Significant” in EIRs (though OK in Initial Study)

Environmental Setting & Impacts: Intro

■ Approach to Analysis

- Explain analytical constructs used throughout EIR, if necessary
- Explain growth assumptions/areas of greatest change (for area plans)
- Explain analysis organization (for complex projects/multiple components)
- Explain analysis for project variants

Environmental Setting & Impacts: Intro

■ Approach to Cumulative Analysis

- Specify type of cumulative approach used: projection, list, hybrid
- Projection approach: based on citywide growth forecasts; *generally* used in SF environmental documents
- List approach: *selectively* used when consideration of individual projects in vicinity required for adequate cumulative impact assessment
- Hybrid approach: list approach for some resource topics, projection approach for others

Environmental Setting & Impacts: Intro

- Environmental Topics for “Informational Purposes”
 - Setting info from topics scoped out of EIR may be included for “informational purposes”
 - At discretion of E coordinator
 - Addressed briefly in general Setting subsection at end of Introduction subchapter
 - Informational topics should *not* be stand-alone subchapters in Chapter 4

Impact Evaluation: Impact Statements

No impact

Impact AE-1: The proposed project would not have a substantial adverse effect on a scenic vista. (No Impact)

Less than significant

Impact AE-1: The proposed project would not have a substantial adverse effect on a scenic vista. (Less than Significant)

Less than significant with mitigation

Impact AE-1: The proposed project would have a substantial adverse effect on a scenic vista. (Less than Significant with Mitigation)

Impact Evaluation: Impact Statements

Significant and unavoidable with mitigation

Impact AE-1: The proposed project would have a substantial adverse effect on a scenic vista. (Significant and Unavoidable with Mitigation)

Significant and unavoidable

Impact AE-1: The proposed project would have a substantial adverse effect on a scenic vista. (Significant and Unavoidable)

Alternatives

- Reasonable range of alts, including No Project
- Alts naming convention
 - Alternative A: No Project
 - Alternative B: Brief Title
- Alts Introduction
 - Summary of significant project impacts that alts to reduce or avoid
 - Approach for alts feasibility assessment

Alternatives: Organization

- EIR Alternatives

- Fully evaluated Alts A, B,C, etc., to have separate subchapters

- Environmentally Superior Alternative

- Present comparison of project impacts and alts
- Identify environmentally superior alternative (other than No Project)

- Alternatives Considered but Rejected

- Subchapter at *end* of Alts chapter, not before EIR Alts subchapter
- State rationale for rejection of alts

Alternatives: Analysis to Address

- Impacts for E topics in Chapter 4
- Impacts for E topics screened out in IS (briefly)
- Whether alts eliminate or reduce significant impacts of proposed project
- Whether alts require mit measures (including for topics screened out in IS)
- Whether alternatives meet majority of project objectives (briefly)

Alternatives: Preservation Alternatives

- Needed if project includes demo or alteration of a historic structure
 1. Full Preservation Alternative – Mandatory
 2. Partial Preservation Alternative – Optional
- Developed in consultation with E coordinator and Department preservation specialist

Responses to Comments

- New name – Responses to Comments document
 - Do not use “Comments and Responses” or “C&R”
- RTC Distribution Notice – first page of RTC
- RTC to be organized by resource topic – same as DEIR
- Address comments on topics from IS after DEIR comments, in same order as IS checklist topics

Responses to Comments

- All comments to be direct quotes from comment letters and hearing transcript
 - No comment letter text to be excluded or left un-bracketed
 - Comments should not be summarized
- Multiple similar comments grouped together as a single comment

RTC: Objectives of Responses

- Address all substantive comments received
- Acknowledge comment, but do not summarize in response
- Identify where relevant information presented in DEIR
- Provide rationale for analysis approach used in DEIR
- Justify information presented in DEIR
- Explain DEIR findings – clarify or expand upon DEIR information and analyses
- Modify DEIR to correct errors and improve document
- Avoid introducing substantive new information or analyses that could trigger recirculation

Responses to Comments - Example

Comment NO-3: The increase in traffic volumes on Main Street would increase noise levels for residents along that street to an unacceptable level.

“The EIR didn’t do any acoustical evaluation of how all that traffic will affect residents on Main Street. It will be intolerably noisy.” (*Jane Doe, Main Street Neighborhood Association, Letter, January 15, 2011*)

“I live on Main Street and I can tell you that it’s already noisy from buses, truck, etc. and adding project traffic on top will make it even worse.” (*John Doe, Public Hearing Transcript, January 2, 2011.*)

Response NO-3

As discussed in Response NO-2, the Initial Study (DEIR Appendix A, page 30) determined that the proposed project would not result in a noticeable increase in traffic noise levels in the project area above the existing range of between 65 dBA and 70 dBA. . .

Responses to Comments - Example

- Example of response identifying a revision to DEIR:
 - In order to clarify that the increase in traffic noise would not be significant, the following sentence has been added to the end of the first paragraph on page IV.D-17 of the DEIR:
 - For the above reasons, the 2-dBA increase in ambient noise levels in the project area would be a less-than-significant impact.
- State that revision does not change the analysis or conclusions presented in the DEIR

Questions and Comments?



Questions and Comments

- We value your feedback on the training and the EP Guidelines!
 - Offer now
 - Fill out feedback form
 - Submit to Lisa Gibson at lisa.gibson@sfgov.org or (415) 575-9032



Thank you for coming!

Please continue conversations in Room 403.
This room must be vacated by noon.

