
CHAPTER 4

Other CEQA Issues

4.A Growth-Inducing Impacts

The California Environmental Quality Act (CEQA) Guidelines require that an environmental impact report (EIR) evaluate the growth-inducing impacts of a proposed action (section 15126.2(d)). A growth-inducing impact is defined in the CEQA Guidelines section 15126.2(d) as:

[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth ... It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can have direct and/or indirect growth-inducement potential. Direct growth inducement would result if a project involved construction of new housing that would result in new residents moving to the area. A project can have indirect growth-inducement potential if it were to establish substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) or if it were to involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional housing and services to support the new employment demand. Similarly, under CEQA, a project would indirectly induce growth if it were to remove an obstacle to additional growth and development, such as removing a constraint on required public services, utilities, or infrastructure facility. Increases in population could tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA Guidelines also require analysis of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The project site is located within the Balboa Park Priority Development Area, one of the 10 designated Priority Development Areas in San Francisco. Priority Development Areas are locally identified areas located near transit and having infill development opportunities; they are part of a regional planning initiative led by the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC). The initiative links land use and transportation planning and promotes a connected and more compact land use pattern. Under the initiative, future growth in the region would be focused in the community-identified Priority Development Areas.

Priority Development Areas are also important components of Plan Bay Area, which is the regional planning effort undertaken in response to the Sustainable Communities Strategy (Senate Bill 375), a state law passed in 2008. Plan Bay Area focuses much of the region's projected growth within the Priority Development Areas. San Francisco elected officials and agency staff have participated in the Sustainable Communities Strategy development process since its inception, and the San Francisco Planning Department updates the City and County of San Francisco's (the City's) long-range land use allocation every four years based on the most recent ABAG forecast for the Sustainable Communities Strategy.

As discussed in subsequent EIR (SEIR) Appendix B, Initial Study, Section E.3, Population and Housing, Impact PH-1, p. B-18, the addition of 1,100 or 1,550 residential units would increase the residential population on the site by 2,530 to 3,565 persons. The proposed project would result in 1,380 and 2,415 more residents than originally analyzed in the PEIR for the Developer's Proposed Option and the Additional Housing Option, respectively. ABAG's population projection for the Balboa Park Priority Development Area is 9,855 in 2040, compared to a 2010 population of 3,819.¹ The project proposes a maximum of 1,550 residential units, which would represent approximately 23 percent of the housing unit growth within the Balboa Park Priority Development Area during that period. ABAG also projected a citywide population growth of 280,465 persons between 2010 and 2040 (from 805,235 in 2010 to 1,085,700 in 2040).² As described under Impact PH-2, the population increase attributable to the proposed project would represent up to 0.6 percent of the projected increase in citywide growth and less than 0.1 percent of the projected increase in the Bay Area-wide population growth. The growth projections in the Balboa Park Priority Development Area represent planned growth in the city, as Priority Development Areas are locally designated areas within existing communities that have been identified and approved by local cities or counties for future growth.

As also described in Impact PH-2, the proposed retail space and childcare facility/community space would generate an estimate 30 jobs. The jobs created by the proposed project would represent an increase of approximately 12 percent of the maximum number of jobs envisioned in the plan area. However, the increase in jobs from the proposed project would represent less than 1 percent of citywide job growth and would not represent a substantial increase in growth as compared to the anticipated employment growth of 190,780 jobs expected for the city from 2010–2040.³ Thus, while development of the project would represent growth, the generation of new jobs would not encourage substantial new growth that is not currently projected for San Francisco. Further, as addressed under their respective topics in the initial study, this project-related growth would be served by existing utilities, infrastructure, and public services.

¹ Metropolitan Transportation Commission (MTC), Plan Bay Area (2013) Forecast by Priority Development Area: Balboa Park, <http://opendata.mtc.ca.gov/datasets>, November 2018. While the *Plan Bay Area 2040* is the most current regional planning document, it does not provide explicit updated population forecasts at the Priority Development Area level; therefore, this analysis considers data as included in the *2013 Plan Bay Area* to estimate planned growth in the Balboa Park Priority Development Area.

² ABAG, *Projections 2013*, December 2013. The *Plan Bay Area 2040* indicates that its projections for the region as a whole represent a moderate increase over 2040 estimates from the 2013 Plan Bay Area and incorporate the region's strong growth since 2010; thus, analyzing growth based on the 2013 Plan Bay Area provides a more conservative growth analysis.

³ ABAG, *Projections 2013*, December 2013.

The increase in the residential and employment population on the project site would not result in a substantial or unplanned increase in the population of the project vicinity or the city because it would be located on an infill site in an urbanized area. Growth associated with the project site would be consistent with the City's identification of Balboa Park as an area of San Francisco where future growth will be focused. Although the proposed project would construct new internal roadways and site infrastructure, the proposed project would not result in the extension of infrastructure systems beyond what is needed to serve project-specific demand. The proposed project would not result in the construction of a residential project in an undeveloped area; or remove obstacles to population growth such as the provision of major new public services to an area where those services are not currently available.

Based on this analysis, the project would not have a substantial growth-inducing impact, and no mitigation is required.

4.B Significant and Unavoidable Impacts

CEQA Guidelines section 15126.2(b) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. As described in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, the impacts listed below would be considered significant and unavoidable, even with implementation of feasible mitigation measures. With the exception of the impacts listed below, all other project impacts would be either less than significant or reduced to less-than-significant levels by implementation of the identified mitigation measures.

4.B.1 Transportation and Circulation

The proposed project's physical changes to Lee Avenue could result in secondary effects if there is a resulting deficit in freight loading supply serving Whole Foods and other nearby uses. These secondary effects could impact existing passenger and freight loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or people walking. (Impact TR-6)

Operation of the proposed project, in combination with other cumulative development would impact existing passenger and freight loading/unloading zones, and may create hazardous conditions or significant delay that may affect transit, other vehicles, bicycles, or people walking. The project's contribution would be cumulatively considerable. (Impact C-TR-6)

4.B.2 Noise and Vibration

Project construction would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors above levels existing without the project. Mitigation including construction noise control measures would lessen the severity of the impact, but not to a less-than-significant level. This impact is significant and unavoidable with mitigation. (Impact NO-1)

Construction truck traffic would cause a substantial temporary or periodic increase in ambient noise levels along access streets in the project vicinity. Mitigation would substantially reduce the construction truck traffic noise increases; however, given the uncertainty regarding implementation of the mitigation measure, this impact is conservatively considered significant and unavoidable, with mitigation. (Impact NO-2)

Construction of the proposed project, in combination with construction of other cumulative development, would cause a substantial temporary or periodic increase in ambient noise levels at noise-sensitive receptors, due to overlapping construction activities in proximity to existing offsite receptors, resulting in a significant cumulative impact. The project's contribution to this impact would be cumulatively considerable. Mitigation including construction noise control measures would lessen the severity of the impact, but not to a less-than-significant level. (Impact C-NO-1)

4.B.3 Air Quality

During project construction (including during construction of Phase 2 that overlaps with Phase 1 project operations), the proposed project would generate criteria air pollutants at levels that would violate air quality standards for ROG and NO_x, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria air pollutants. Mitigation measures to (1) minimize construction emissions for off-road construction equipment, (2) require use of low-VOC architectural coatings, (2) fund or implement a program that would offset the construction and operational emissions would substantially lessen the severity of the impact, (4) require emission reductions for diesel back-up generators, (5) promote use of green consumer products, and (6) implement additional mobile source control measures. However, due to the unknowns associated with implementing an emission offset program and construction phasing depending on market conditions and other unanticipated factors, this impact is conservatively considered significant and unavoidable, with mitigation. (Impacts AQ-2a and AQ-2b)

During project construction (including during construction of Phase 2 that overlaps with Phase 1 project operations), the proposed project would generate TACs at levels that would expose either offsite or onsite sensitive receptors to substantial pollutant concentrations. The health risk assessment conducted for the proposed project determined that impacts associated with excess cancer risk at both offsite and onsite receptors would exceed significance thresholds without mitigation. Mitigation measures to (1) minimize construction emissions for off-road construction equipment, (2) require emission reductions for diesel backup generators, and (3) require installation of MERV 13 filters at the onsite daycare facility would reduce the impact on offsite and onsite sensitive receptors. However, due to the unknowns associated with construction phasing that depends on market conditions and other unanticipated factors that could result in increases in exposure and health risks, health risks at offsite receptor locations are conservatively assumed to still exceed the significance thresholds, and impacts would therefore be considered significant and unavoidable, with mitigation. (Impact AQ-4)

The proposed project, in combination with past, present, and reasonably foreseeable future development in the project area, would contribute to cumulative regional air quality impacts and cumulative health risk impacts on sensitive receptors. Mitigation measures to (1) minimize construction emissions for off- and on-road equipment and vehicles, (2) require use of low-VOC architectural coatings, (3) fund or implement a program that would offset the construction and operational emissions and would substantially lessen the severity of the impact, (4) require emission reductions for diesel back-up generators, (5) promote use of green consumer products, (6) implement additional mobile source control measures, and (7) require installation of MERV 13 filters at the onsite daycare facility. However, due to the unknowns associated with implementing an emission offset program and the unknowns associated with construction phasing depending on market conditions and other unanticipated factors which could result in increased exposure and health risks, this impact is conservatively considered significant and unavoidable, with mitigation. (Impacts C-AQ-1 and C-AQ-2)

4.C Significant Irreversible Environmental Impacts

In accordance with CEQA section 21100(b)(2)(B) and CEQA Guidelines section 15126.2(c), an EIR must identify any significant irreversible environmental changes that could result from implementation of the proposed project. This may include current or future uses of nonrenewable resources, and secondary or growth-inducing impacts that commit future uses of nonrenewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. According to the CEQA Guidelines, irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. In general, such irreversible commitments include resources such as energy consumed and construction materials used in construction of a proposed project, as well as the energy and natural resources (notably water) that would be required to sustain a project and its inhabitants or occupants over the usable life of the project.

Construction of the proposed project would require the use of energy, including energy produced from nonrenewable resources, and energy would be consumed during the operational period of the proposed project. Construction would also require the commitment of construction materials, such as steel, aluminum, and other metals, concrete, masonry, lumber, sand and gravel, and other such materials, as well as water. The proposed project would commit future generations to an irreversible commitment of energy, primarily in the form of fossil fuels for heating and cooling of buildings, for automobile and truck fuel, and for energy production. The project would require an ongoing commitment of potable water for building occupants and landscaping.

New buildings in California are required to conform to energy conservation standards specified in California Code of Regulations title 24, which are among the most stringent in the United States. The standards establish energy budgets for different types of residential and nonresidential buildings with which all new buildings must comply. In addition, to ensure that all buildings are healthy, sustainable places to live, work, and learn, the San Francisco Green Building Code requirements are designed to reduce energy and water use, divert waste from

landfills, encourage alternate modes of transportation, and support the health and comfort of building occupants in San Francisco. New construction in San Francisco must meet all applicable California and local building codes, provide onsite facilities for recycling and composting, and meet the City's green building requirements tied to the Leadership in Energy and Environmental Design and GreenPoint Rated green building rating systems, all of which would ensure that natural resources are conserved or recycled to the maximum extent feasible and that greenhouse gas emissions resulting from the project would be minimized. Even with implementation of conservation measures, the consumption of natural resources, including electricity and natural gas, would generally increase with implementation of the proposed project. However, the proposed project would not involve the wasteful, inefficient, or unnecessary consumption of energy resources, as discussed in the initial study (see Appendix B, Initial Study, Section E.20, Energy, p. B-112). Overall, this development would be expected to use less energy and water over the lifetime of the proposed buildings than comparable structures not built to these same standards.

As further described in SEIR Appendix B, Initial Study, Section E.13, Utilities and Service Systems, Impact UT-1, p. B-58, while the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand would be accommodated within available water supplies and current water supply planning. While potable water use would increase, the proposed project would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the San Francisco Green Building Ordinance and the City's Non-potable Water Ordinance. During construction activities, water may be used for soil compaction and dust control activities. However, as discussed under SEIR Section 3.D, Air Quality, San Francisco Public Works Code article 21 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction, unless permission is obtained from the San Francisco Public Utilities Commission. Therefore, while the consumption of water would increase as the result of construction and operation of the proposed project, the proposed project would not involve the wasteful, inefficient, or unnecessary use of water resources, as discussed in SEIR Appendix B, Initial Study.

Comment [PJ(1)]: To be confirmed.

WW: also update the SU impacts, as needed, to reflect edits in other chapters.

Development of the proposed project, an infill project within a developed urban area, would not substantially alter the pattern of land use or transportation in the project vicinity and, therefore, would not commit future generations of the project site and vicinity to any particular land use or transportation pattern, nor would it mean that the project site could not be feasibly redeveloped again at some unknown date in the future.

4.D Areas of Known Controversy and Issues to Be Resolved

On October 10, 2018, the San Francisco Planning Department issued a notice of preparation (NOP) of an EIR on the proposed Balboa Reservoir project and made the NOP available on its website. SEIR Chapter 1, Introduction, describes the public review process and summarizes the comments received on the NOP. The NOP was sent to governmental agencies, organizations, and persons interested in the proposed project to initiate the 30-day public scoping period for this

SEIR, which started on October 10, 2018, and ended on November 12, 2018. A scoping meeting was held on October 30, 2018, to solicit comments on the scope of this SEIR, including the initial study.

Based on the comments received, controversial issues for the proposed project include:

- The maximum number of housing units that should be analyzed in the subsequent EIR, either as a variant of the proposed project or an alternative to the proposed project;
- Use of the site for other potential land uses such as expansion of City College or preserving the site as open space;
- Sufficiency of impact analysis in a subsequent EIR;
- Impacts related to affordable housing and jobs-housing balance;
- Effects of project operations on public transportation, pedestrian access, and vehicle traffic;
- Secondary environmental effects related to displacement of City College parking currently at the project site and changes in parking availability during operations;
- Impacts from exposure to air pollutants during construction and operation;
- Cumulative impacts resulting from construction of the proposed project and other adjacent projects;
- Effects of construction or operational noise on surrounding educational facilities;
- Effects of the project on public services, including emergency response;
- Sufficiency of existing or proposed utilities to support proposed project; and
- Aesthetic effects of the proposed development, including height of buildings compared to surrounding areas including Westwood Park.

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