V. OTHER CEQA CONSIDERATIONS

A. GROWTH INDUCING IMPACTS

As required by Section 15126.2(d) of the CEQA Guidelines, an EIR must discuss the ways in which the Proposed Project could directly or indirectly foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts can result from the elimination of obstacles to growth; through increased stimulation of economic activity that would, in turn, generate increased employment or demand for housing and public services; or as a result of policies or measures which encourage premature or unplanned growth.

Implementation of the Proposed Project would require amendments to the San Francisco General Plan and the Planning Code. The existing zoning on Treasure Island and Yerba Buena Island is P (Public Use) District, and the existing height and bulk classification is 40-X. The Proposed Project would require that the General Plan and Planning Code be amended to incorporate the land use designations, height limits, and allowable land uses specified in the Area Plan and SUD, which incorporates the proposed Design for Development. These amendments and the resulting Development Program would change the mix and types of land uses on Treasure Island and Yerba Buena Island, and would allow for increased density and building heights. The ABAG regional Projections 2009 includes proposed development within the Project Area as a Priority Development Area, and designates Treasure Island as an opportunity site for high-density housing and support services in the region. Improved and expanded infrastructure, public services, and transit improvements would be required to serve development on the Islands; however, the improved and/or expanded infrastructure and services would not create additional capacity beyond what is required to serve the Project Area, and therefore would not directly or indirectly induce growth in the region.

While the Proposed Project in itself represents growth, the provision of new housing and employment opportunities would not encourage substantial new growth in the City that has not previously been projected. As described in Section IV.C, Population and Housing, the Proposed Project would provide up to 7,195 net new housing units, including affordable and family-sized units. Using conservative assumptions, the Proposed Project would generate demand for 2,095 housing units in the region by 2030, which is far less than the 7,195 net new units proposed. As such, the Proposed Project would not be expected to generate the need for substantial new housing within the City, and would not contribute to unplanned housing growth in the region.

Development within the Project Area would provide about 2,600 net new permanent jobs by 2030. This total represents less than about 1 percent of the projected Citywide employment in 2030 and about 0.2 percent of the expected increase in projected regional...
employment through 2030. Therefore, the Proposed Project would not contribute to unplanned employment growth that has not already been accounted for in the City and Bay Area region.

Implementation of the Proposed Project would replace aging and deteriorated infrastructure within the Development Plan Area. It would also create a new street grid and improved local and regional transit service that would improve access to the Islands. However, the Proposed Project would not create new transportation access to an area that was previously inaccessible by transit or automobile, and therefore would not create new access to an outlying area.

Proposed new construction and expansion, replacement or upgrade of the utility and infrastructure system, public roads, public facilities, and other community services and open space would not generate indirect population growth since those systems and services would primarily serve residents, employees, and visitors to the Project Area. The Islands are isolated by the Bay from other mainland development, and the Proposed Project would not extend water, sewer, or other public services to currently underserved mainland areas. Therefore, the Proposed Project would not eliminate obstacles to growth. Increased ferry transit access to the Islands could generate indirect population growth to the extent that it increases the attractiveness of the Development Plan Area for new employment or stimulates new housing development that would be accessible by the proposed ferry service.

The proposed Sustainability Plan includes a number of elements that would potentially limit indirect and unplanned growth. These include high-density, mixed-use development near transit and within walking distance of neighborhood services and open space (i.e., transit-oriented development), adaptive reuse of existing historic structures that allow for community services to be provided within existing building space instead of creating demand at other off-site locations, and transportation strategies such as parking capacity controls and congestion pricing that discourage sprawled development.

The Proposed Project would provide for high-density (100 to 110 units/acre) residential growth supported by community facilities, public services, transit service and infrastructure, and new or upgraded public utilities. To the extent that this growth would have been otherwise accommodated at other Bay Area locations, the Proposed Project could limit sprawl and support sustainable growth by providing an opportunity for infill development on underused land, near existing regional employment centers, housing and existing and planned transit facilities.

The Proposed Project would assist in meeting ABAG’s regional housing objectives under the FOCUS Program and would conform with ABAG’s regional goals to focus growth and development by creating compact communities with a diversity of housing, jobs, activities and services, and increasing housing supply, improving housing affordability, and increasing
transportation efficiency and choices.¹ In this respect, implementation of the Proposed Project may be considered growth managing rather than growth inducing by facilitating urban in-fill, restoring a previously developed site with sources of contamination, and increasing open space. Based on this analysis, the Proposed Project would not have a growth-inducing impact, and no mitigation is required.

- The America’s Cup sailing races are expected to be held in San Francisco Bay in the summer and fall in 2012 and again in the summer and fall in 2013. No special facilities for these races are proposed to be constructed on Treasure Island or Yerba Buena Island. It is expected that interested spectators would use Treasure Island as a viewing area for some of these races, as would many other shoreline locations in San Francisco, such as Herb Caen Way along The Embarcadero, the Marina Green, and shoreline sites in the Golden Gate National Recreation Area.

- The spectator activities likely to occur on Treasure Island would be short term, similar to the special events that occur there now, such as the annual Treasure Island Music Festival. For those events, a special transportation demand management (“TDM”) program is used to coordinate access to and egress from the Islands. Therefore, a mechanism is already in place to address any temporary transportation issues that might arise during the six- to eight-week period that the America’s Cup races would occur. It is not likely that regular ferry service would have been initiated by the time that the America’s Cup races were held; therefore, the existing TDM program would likely be used.

- Based on the information about phasing of the Proposed Project (see Chapter II, Project Description, Section K, Project Phasing and Construction, p. II.79 – II.82), it is not likely that substantial amounts of new housing or commercial space would have been constructed and be available for occupancy by 2012 – 2013 when the America’s Cup races would occur. Therefore, it is not expected that spectator activities would result in substantial impacts on new businesses or new residents of the Islands. Spectator activity at Treasure Island during the America’s Cup races would not be a long term or permanent activity. Therefore, it would not result in growth-inducing impacts on Treasure Island.

¹ ABAG administers the FOCUS program, in partnerships with MTC, BCDC, and BAAQMD. FOCUS is a regional development and conservation strategy that promotes more compact land use patterns in the Bay Area.
V. Other CEQA Considerations

- There is likely to be new development on the mainland along the San Francisco waterfront to support the America’s Cup. Specifics of that development are currently being developed, and environmental review of that development has been initiated by the San Francisco Planning Department.\(^2\) It is possible that some of the temporary waterfront development for the race activities would block pedestrian views of Treasure Island and Yerba Buena Island from The Embarcadero and Herb Caen Way. Impacts will be identified in detail in the EIR that is now in preparation for that project. Permanent improvements to Piers 30-32, 26 and 28, 19 and 19-1/2, and 27-29 and 29-1/2 have not been designed in detail. The improvements known at this time mainly include seismic upgrades and repairs and improving the pier structures and aprons. These and other improvements along the mainland shoreline would not directly affect Treasure Island or Yerba Buena Island.

B. SIGNIFICANT UNAVOIDABLE IMPACTS

In accordance with Section 21061 of CEQA and with Sections 15126(b) and 15126.2(b) of the CEQA Guidelines, the purpose of this section is to identify significant environmental impacts that cannot be eliminated or reduced to less-than-significant levels by implementation of mitigation measures included in the Proposed Project or identified in Chapter IV, Environmental Setting and Impacts.

The Proposed Project, with mitigation, would result in the following significant, unavoidable project-level and cumulative impacts. In many cases, mitigation measures would reduce the significant impact, but not to a less-than-significant level.

AESTHETICS

- Development under the Proposed Project would adversely alter scenic vistas of San Francisco and San Francisco Bay from public vantage points along the eastern shoreline of San Francisco, Telegraph Hill, the East Bay Shoreline, and from the Bay Bridge east span.

HISTORIC ARCHITECTURAL RESOURCES

- Demolition of the Damage Control Trainer, a battleship simulator known as the U.S.S. Buttercup, would impair the significance of an historical resource.

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V. Other CEQA Considerations

TRANSPORTATION

The following transportation impacts would be significant and unavoidable even with implementation of mitigation measures identified in the EIR:

- Construction of the Proposed Project would occur over a long period of time (15 to 20 years), and would result in significant impacts on the transportation and circulation network.
• Implementation of the Proposed Project would contribute to existing LOS E operating conditions during the weekday PM peak hour, and result in significant impacts during the Saturday peak hour at the eastbound off-ramp (west side of Yerba Buena Island).
• Under conditions without the Ramps Project, implementation of the Proposed Project would result in significant impacts at the two westbound Bay Bridge on-ramps.
• Under conditions with the Ramps Project, implementation of the Proposed Project would result in a significant impact during the AM and PM peak hours at the ramp meter at the westbound on-ramp (east side of Yerba Buena Island).
• Implementation of the Proposed Project would result in a significant impact on queuing at the Bay Bridge toll plaza during the weekday AM peak hour, with and without the Ramps Project.
• Implementation of the Proposed Project would result in a significant impact on queuing on San Francisco streets approaching the Bay Bridge during the weekday PM peak hour, under conditions with and without the Ramps Project.
• Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Market.
• Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Mission.
• Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Folsom.
• Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of First/Harrison/I-80 Eastbound On-Ramp.
• Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of Bryant/Fifth/I-80 Eastbound On-Ramp.
• Implementation of the Proposed Project would result in a significant project impact at the signalized intersection of Fifth/Harrison/I-80 Westbound Off-Ramp.
• Implementation of the Proposed Project would contribute substantially to existing LOS E conditions at the signalized intersection of Second/Folsom, resulting in a significant project impact.
• Implementation of the Proposed Project would result in a significant project impact at the uncontrolled intersection of Folsom/Essex.
• Implementation of the Proposed Project would result in a significant project impact at the uncontrolled intersection of Bryant/Sterling.
• Implementation of the Proposed Project would exceed the available transit capacity of Muni’s 108-Treasure Island bus line serving the Islands.
• Implementation of the Proposed Project under conditions without the Ramps Project would impact AC Transit operations on Hillcrest Road between Treasure Island and the eastbound on-ramp to the Bay Bridge.
• Implementation of the Proposed Project under conditions with the Ramps Project would impact AC Transit operations on Treasure Island Road and Hillcrest Road between Treasure Island and the eastbound on-ramp to the Bay Bridge.
V. Other CEQA Considerations

- The Proposed Project would increase congestion in downtown San Francisco, which would increase travel times and would impact operations of the Muni 27-Bryant bus line.
- The Proposed Project would increase congestion in downtown San Francisco, which would increase travel times and would impact operations of the Muni 30X-Marina Express bus line.
- The Proposed Project would increase congestion in downtown San Francisco, which would increase travel times and would impact operations of the Muni 47-Van Ness bus line.
- Construction of the Proposed Project would occur over a long period of time (15 to 20 years), and would contribute to cumulative construction impacts in the Project vicinity.
- Implementation of the Project would contribute to significant cumulative traffic impacts at the eastbound off-ramp (west side of Yerba Buena Island).
- Under conditions without the Ramps Project, implementation of the Proposed Project would contribute to significant cumulative impacts at the two westbound Bay Bridge on-ramps.
- If the westbound ramps on the east side of Yerba Buena Island are reconstructed as part of the Ramps Project, implementation of the Project would result in significant cumulative impacts during the AM and PM peak hours at the ramp meter at the westbound on-ramp (east side of Yerba Buena Island).
- Implementation of the Project would contribute to significant cumulative queuing impacts at the Bay Bridge toll plaza during the AM and PM peak hours, whether or not the Ramps Project is implemented.
- Implementation of the Project would contribute to significant cumulative queuing impacts on San Francisco streets approaching Bay Bridge during the weekday AM and PM and Saturday peak hours, whether or not the Ramps Project is implemented.
- Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Market.
- Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Mission.
- Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Folsom.
- Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of First/Harrison/I-80 Eastbound On-Ramp.
- Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of Bryant/Fifth/I-80 Eastbound On-Ramp.
- Implementation of the Proposed Project would result in significant project and cumulative impacts at the intersection of Harrison/Fifth/I-80 Westbound Off-Ramp.
- Implementation of the Proposed Project would result in a significant project and cumulative impacts at the intersection of Second/Folsom.
- Implementation of the Proposed Project would contribute to significant cumulative impacts at the uncontrolled intersection of Folsom/Essex.
• Implementation of the Proposed Project would contribute to significant cumulative impacts at the uncontrolled intersection of Bryant/Sterling.

• The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 27-Bryant bus line.

• The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 30X-Marina Express bus line.

• The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 47-Van Ness bus line.

• The Proposed Project would contribute to cumulative congestion in downtown San Francisco, which would increase travel time and would impact operations of the Muni 10-Townsend bus line.

• Implementation of the Proposed Project parking supply maximums would exacerbate the exceedance of the capacity utilization standard on Muni’s 108-Treasure Island bus line serving the Islands.

NOISE

The following noise impacts would be significant and unavoidable even with implementation of mitigation measures identified in this EIR:

• Project-related construction activities would increase noise levels above existing ambient conditions.

• Construction activities could expose persons and structures to excessive ground-borne vibration or ground-borne noise levels.

• Project-related traffic would result in a substantial permanent increase in ambient noise levels in the project vicinity above existing ambient noise levels.

• Project-related ferry noise levels would result in substantial permanent increase in ambient noise levels in the project vicinity above existing ambient conditions.

This impact would be significant and unavoidable only if the San Francisco Water Emergency Transportation Agency elects not to implement Mitigation Measure M-NO-4 to prepare and implement a noise reduction plan.

• Project-related construction activities in combination with construction activities of other cumulative development would increase noise levels above existing ambient conditions.

• Increases in traffic from the project in combination with other development would result in cumulative noise increases.

AIR QUALITY

• Construction of the Proposed Project could violate an air quality standard or contribute significantly to an existing or projected air quality violation.
Construction of the Proposed Project could affect regional air quality. Although less-than-significant under existing CEQA Guidelines, this impact would be significant and unavoidable because the Proposed Project would exceed the significance thresholds as quantified under the June 2010 BAAQMD CEQA Guidelines.

- Construction of the Proposed Project could expose sensitive receptors to substantial levels of toxic air contaminants which may lead to adverse health effects.

- Construction of the Proposed Project would expose persons to substantial levels of PM2.5 (particulate matter of 2.5 microns in diameter or less) which may lead to adverse health effects.

- The Proposed Project’s operations would violate an air quality standard or contribute substantially to an existing or projected air quality violation.

The Proposed Project would result in emissions of criteria pollutant that would exceed the significance thresholds established by BAAQMD.

- Operation of the Proposed Project could expose sensitive receptors to substantial pollutant concentrations.

- The Proposed Project could result in significant cumulative air quality impacts.

**WIND AND SHADOW**

- The phased development of the Proposed Project could temporarily result in the creation of a Section 148 wind hazard, an increase in the number of hours that the wind hazard criterion is exceeded or an increase in the area that is subjected to wind hazards.

- Section 148 wind hazards would occur at publicly accessible locations in the Development Plan Area. These wind hazards would represent a general reduction in the number of existing wind hazards and the overall duration of the wind hazards. Changes in building design, height, location, and orientation, as well as changes in the overall configuration of the Project, could result in wind hazards that differ from those found for the representative design Project. The wind hazards could occur in different locations, could increase the number of hours that any wind hazard would occur, and/or could increase the area that would be subjected to wind hazards.

- The Proposed Project, when combined with other cumulative projects, could result in wind hazards that differ from those found for the representative design Project, either in the location of the hazard, in an increase in the number of hours that Section 148 wind hazards would occur, or in an increase in the area that is subjected to wind hazards.
V. Other CEQA Considerations

BIOLOGICAL RESOURCES

- The project may adversely affect the movement of migratory birds, rafting waterfowl, and/or fish passage. This impact would be significant and unavoidable for rafting waterfowl, but less than significant for migratory birds and fish passage.

- Expanded ferry or water taxi services in San Francisco Bay are expected to contribute, along with the Proposed Project, to a cumulatively significant and unavoidable impact on rafting waterfowl.

This impact would be significant and unavoidable only if the San Francisco Water Emergency Transportation Agency elects not to implement Mitigation Measure M-BI-4b to modify ferry service to protect rafting waterfowl.

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE CAUSED BY THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

Significant irreversible environmental changes would occur with implementation of the Proposed Project. Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The project would involve a large commitment of nonrenewable resources and the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Development of the Proposed Project would result in the long-term conversion of a former military base to a mixed-use urban development that would provide new and enhanced open space, and new and/or improved transportation and utility infrastructure which would be a long term commitment to future generations of a similar use. This change in use, however, is consistent with long-term changes to land use within the region as directed and encouraged by local and regional planning agencies, including ABAG's designation of Treasure Island as a Priority Development Area, as part of its FOCUS Program as discussed in Section A, Growth Inducing Impacts, on p. V.2.

The Proposed Project would not involve uses in which irreversible damage could result from potential environmental accidents. For the Proposed Project, such accidents would be primarily associated with release of, or exposure to, hazardous materials. The Navy would be responsible for completing its remediation responsibilities under the requirements of the Comprehensive Environmental Response and Liability Act (“CERCLA”) and the Petroleum Program. The
Navy's compliance with these statutory requirements would mitigate potential irreversible damage that could occur from release of or exposure to hazardous materials.

Development of the Proposed Project would involve a commitment of no-renewable resources to construct buildings and infrastructure, including lumber, concrete, sand, gravel, masonry, metals, and water. However, development would not be expected to involve an unusual commitment of these resources, nor would it be expected to consume any of these resources in a wasteful manner. The Proposed Project’s Sustainability Plan includes reuse and recycling goals for demolition of existing structures that would reduce the amount of resources used both in the Proposed Project and elsewhere.

Construction of buildings and infrastructure, and occupancy at buildout, would use energy resources in the form of fossil fuels. During construction, diesel and gasoline fuels would be consumed to operate construction equipment. During operation, diesel and gasoline fuels would be consumed to operate the buses and ferries that would provide transportation to and from the Islands, and for the automobiles and trucks that would visit the Islands. Natural gas would be used for heating and cooling. Because individual buildings would be required to meet or exceed the energy conservation requirements in the San Francisco Green Building Ordinance, which itself includes energy conservation requirements that exceed those in the California Building Code, energy would not be used in a wasteful, inefficient, or unnecessary manner. In addition, the Proposed Project includes a commitment to produce at least 5 percent of its energy demand from on-site renewable sources, further reducing the irreversible use of fossil fuels.

D. AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED

Reuse of Treasure Island and Yerba Buena Island following transfer from the Navy to TIDA has been under discussion for over 15 years. TIDA and TICD, as co-project sponsors, have been working with the Treasure Island / Yerba Buena Island Citizens Advisory Board, the TIDA Board, the Planning Commission, and the Board of Supervisors, multiple city, regional and State agencies, and a large number of other project stakeholders to establish a program of development that would fulfill the various objectives articulated by these groups. Issues raised over the course of the planning process have related to providing affordable housing, preserving and enhancing the natural habitat on Yerba Buena Island, providing access to the new uses on the Islands with the least possible impacts on traffic, providing sufficient transit service, and developing an environmentally sustainable development.

During public scoping for this Environmental Impact Report (“EIR”) in February 2008, many of these issues were raised by public agencies, community and environmental organizations, and interested individuals. Since then, the Development Program has been revised by TIDA and TICD, responding to some of the key concerns, as reflected in the Development Update endorsed.
V. Other CEQA Considerations

by the TIDA Board and Board of Supervisors in May 2010. For example, comments during public scoping suggested that a higher density development would provide better support for the proposed transit services and the retail uses. This resulted in an increase in the Proposed Project from 6,000 to 8,000 residential units. A draft Habitat Management Plan for Yerba Buena Island has been prepared for the Proposed Project, as well as a Sustainability Plan. Public scoping comments recommended parking charges for all spaces, mandatory transit pass purchase for residents, and priority access to the Bay Bridge for buses and emergency vehicles, all of which are included in the Proposed Project.

Other issues of concern raised during the public scoping for the EIR include the following:

- Traffic impacts that would result from the Proposed Project. Traffic impacts should be addressed with additional features such as community-wide membership in a car-share program; mandatory transit passes for residents, employees and hotel guests; increased bicycle parking and shuttles; and convenient access to on-Island retail.
- No parking minimum or parking maximum requirements should be imposed.
- CO₂ emissions (related to greenhouse gas impacts) should be reduced.
- A no-ferry alternative should be analyzed.
- Public access to the shoreline should be supported and enhanced.
- Energy consumption should be reduced, and renewable energy goals should be higher than proposed.
- Use of potable water should be reduced by maximum use of recycled and gray water systems and climate-appropriate landscaping.

Most of these other issues of concern have also been incorporated into components of the Proposed Project. As described in Chapter II, Project Description, p. II.51, the Proposed Project would include formation of the Treasure Island Transportation Management Agency (“TITMA”). TITMA would oversee transit services and implement a series of transportation demand measures to encourage use of transit, free on-island shuttle service for both Islands, a car-share program, bicycle rental system, mandatory purchase of pre-paid transit voucher by household and hotel visitors, and support for vanpool and carpool matching services. All of these elements would reduce traffic generated by the Proposed Project. Traffic impacts of the Proposed Project are discussed in Section IV.E., Transportation. Other considerations to reduce traffic are discussed under Section D.5 Measures to Reduce Automobile Ownership, p. VII.77.

The Proposed Project also would provide 300 acres of new and enhanced parks and open space, which would include shoreline access. An approximately 3.0-mile-long, publicly accessible multi-use path would be developed around the perimeter of Treasure Island, which is planned to be an extension of the San Francisco Bay Trail; refer to Section IV.J, Recreation, p. IV.J.16 for a description of this perimeter path.
V. Other CEQA Considerations

The draft *Design for Development* for the Proposed Project provides for an island-wide maximum parking ratio of one parking space per dwelling unit. The impacts of this parking requirement are analyzed in Section IV.E, Transportation, on pp. IV.E.140-IV.E.141.

Section IV.H, Greenhouse Gases, analyzes a number of project design features related to land use mix and density, transportation management measures, use of renewable energy, and other project elements that would reduce greenhouse gas emissions.

The *Infrastructure Plan* for the Proposed Project includes a renewable energy component. Additionally, the project sponsors have committed to meeting 5 percent of peak electric demand with on-site renewable sources. These project components are discussed in Section IV.Q, Energy and Mineral Resources. As described in Section IV.K, Utilities and Service Systems, p. IV.K.14, the use of recycled water for irrigation and other purposes is a major component of the Treasure Island *Sustainability Plan*.

A no-ferry alternative is addressed in this EIR under Alternative C, No Ferry Service Alternative, in Chapter VII, Alternatives to the Proposed Project, p. VII.48.