

PARKMERCED PROJECT EIR

Comments and Responses



**CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT CASE NO. 2008.0021E**

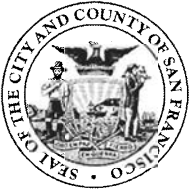
STATE CLEARINGHOUSE NO. 2009052073

DRAFT EIR PUBLICATION DATE: MAY 12, 2010

DRAFT EIR PUBLIC HEARING DATE: JUNE 17, 2010

DRAFT EIR PUBLIC COMMENT PERIOD: MAY 12, 2010 TO JULY 12, 2010

FINAL EIR CERTIFICATION HEARING: NOVEMBER 18, 2010



SAN FRANCISCO PLANNING DEPARTMENT

October 28, 2010

To: Members of the Planning Commission and Interested Parties
From: Bill Wycko, Environmental Review Officer
Re: Attached Comments and Responses on Draft Environmental Impact Report
Case No. 2008.0021E: Parkmerced Project

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

The attached Comments and Responses document, responding to comments made on the Draft Environmental Impact Report (Draft EIR) for the above referenced project, is presented for your information. This document has been provided in PDF format on the Planning Department website, on a CD or as a hard copy. This document, along with the Draft EIR, will be considered by the Planning Commission in an advertised public meeting on November 18, 2010, at which time the Planning Commission will determine whether to certify the EIR as complete and adequate.

We are sending this to you so that you will have time to review the documents. The Planning Commission does not conduct a hearing to receive comments on the Comments and Responses document, and no such hearing is required by the California Environmental Quality Act. Interested parties may, however, write to the Commission members or to the President of the Commission at 1650 Mission Street, Suite 400, San Francisco, CA, 94103, and express an opinion about the Comments and Responses document, or the Commission's decision to certify the completion of the Final EIR for this project. Letters should be sent in time to be received at 1650 Mission Street, Suite 400 on the Wednesday (i.e. by November 17, 2010) before the Planning Commission meeting for which the EIR approval is calendared on November 18, 2010. The certification of the EIR does not indicate a decision by the City to approve or disapprove the proposed project. Approval hearing would occur after the EIR certification.

You should note that if you receive a copy of the Comments and Responses document in addition to the Draft EIR published on May 12, 2010, you will technically have a copy of the Final EIR. Thank you for your interest in this project.

If you have questions about the attached Comments and Responses document, or about this process, please call the EIR Coordinator, Rick Cooper at (415) 575-9027 or Rick.Cooper@sfgov.org.

PARKMERCED PROJECT EIR

Comments and Responses

CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT CASE NO. 2008.0021E

STATE CLEARINGHOUSE NO. 2009052073

DRAFT EIR PUBLICATION DATE: MAY 12, 2010

DRAFT EIR PUBLIC HEARING DATE: JUNE 17, 2010

DRAFT EIR PUBLIC COMMENT PERIOD: MAY 12, 2010 TO JULY 12, 2010

FINAL EIR CERTIFICATION HEARING: NOVEMBER 18, 2010

PARKMERCED PROJECT
COMMENTS AND RESPONSES DOCUMENT

TABLE OF CONTENTS

I. INTRODUCTION.....I.1

A. Purpose of the Comments and Responses Document.....I.1

B. Environmental Review ProcessI.1

C. Document Organization.....I.2

II. LIST OF PERSONS COMMENTING II.1

III. COMMENTS AND RESPONSES..... III.1

A. Master Responses III.A.1

A.1 Historic Resources III.A.1

A.2 Transportation and Circulation III.A.17

A.3 Seismic Hazards..... III.A.31

A.4 Alternatives..... III.A.37

B. Public Hearing Comments and Responses III.B.1

[Responses begin after the last page of the transcript, p. 89]

TR.1 Cathy Lentz..... III.B.1

TR.2 Bernie Choden, San Francisco Tomorrow III.B.2

TR.3 Elizabeth Ranieri..... III.B.4

TR.4 Arne Larsen III.B.4

TR.5 Bert Hill, Board Member, Livable City III.B.5

TR.6 Jacklynn Jweinat, Yousef Realty III.B.6

TR.7 Aaron Goodman..... III.B.6

TR.8 Julian Lagos III.B.8

TR.9 Mary Beth Sanders, Co-Chair, Project Review Committee, San Francisco Planning and Urban Research Association..... III.B.9

TR.10 Fred Kriebel, Kriebel and Associates III.B.9

TR.11 Linh Le..... III.B.10

TR.12 David Meckel, Director of Research and Planning, California College of the Arts..... III.B.11

TR.13 Jim Coppfer III.B.12

TR.14 Daniel Phillips, President, Board of Directors, Parkmerced Residents Organization..... III.B.12

TR.15 Jeremy Setzer III.B.12

TR.16 Joel Koppel III.B.13

TR.17 Maria Elena Guerrero Engber..... III.B.13

TR.18 Dennis Norrington III.B.16

TR.19 Kevin McDonough III.B.17

TR.20 Mitchell Omerberg, Affordable Housing Alliance III.B.17

TR.21 Michael Pappas, Executive Director, San Francisco Interfaith Council..... III.B.18

TR.22 Dr. Terrance Faulkner, J.D. III.B.18

TR.23	Kate Lefkowitz, Program Manager, San Francisco Housing Action Coalition.....	III.B.19
TR.24	Dean Preston, Executive Director, Tenants Together.....	III.B.19
TR.25	Inge Horton, Board of Directors, Sunset Parkside Education and Action Committee.....	III.B.20
TR.26	Mary Ann Miller, Member of the Board, San Francisco Tomorrow	III.B.22
TR.27	Jeanne D’Arcy	III.B.24
TR.28	Jeanne Scott	III.B.24
TR.29	Maria-Elena Mestayer.....	III.B.24
TR.30	Judith Flynn, Director, Montessori Children’s Center.....	III.B.25
TR.31	Dan Weaver	III.B.28
TR.32	Nan Roth.....	III.B.29
TR.33	John Kim.....	III.B.30
TR.34	Commissioner Christina R. Olague, San Francisco Planning Commission	III.B.30
TR.35	Commissioner Michael J. Antonini, San Francisco Planning Commission	III.B.33
TR.36	Commissioner Hisashi Sugaya, San Francisco Planning Commission	III.B.34
TR.37	Commissioner Kathrin Moore, San Francisco Planning Commission	III.B.35
TR.38	President Ron Miguel, San Francisco Planning Commission.....	III.B.35
C.	Written Comments and Responses	III.C.1
	C.1 Agencies	
	Letter 1: Department of Transportation, Lisa Carboni, District Branch Chief, Local Development – Intergovernmental Review	III.C.1.5
	Letter 2: National Trust for Historic Preservation and the California Preservation Foundation, Anthea M. Hartig, Ph.D., Director, Western Office, National Trust for Historic Preservation, and Cathy Heitzman, Executive Director, California Preservation Foundation.....	III.C.2.8
	Letter 3: Office of Historic Preservation Department of Parks and Recreation, Milford Wayne Donaldson, FAIA, State Historic Preservation Officer	III.C.3.4
	Letter 4: San Francisco County Transportation Authority, Tilly Chang, Deputy Director for Planning	III.C.4.3
	Letter 5: Historic Preservation Commission, San Francisco Planning Department.....	III.C.5.3
	C.2 Organizations	
	Letter 6: San Francisco Planning + Urban Research Association, Charmaine Curtis, Mary Beth Sanders, Reuben Schwartz, SPUR Project Review Committee Co-Chairs	III.C.6.5
	Letter 7: The San Francisco Preservation Consortium, Vincent Marsh, Acting Chair	III.C.7.4
	Letter 8: Montessori Children’s Center, Judith Flynn,	

	Director	III.C.8.3
Letter 9:	Lakeshore Acres Improvement Club, Chris S. Manitsas	III.C.9.2
Letter 10:	Sunset Parkside Education and Action Committee, Marc Duffett, President	III.C.10.3
Letter 11:	Lakeshore Acres Improvement Club, Bruce H. Selby	III.C.11.2
Letter 12:	Sierra Club, San Francisco Group, Howard Strassner, Emeritus Chair, Transportation Committee	III.C.12.4
Letter 13:	Merced Extension Triangle Neighborhood Association, Glen Hatakeyama	III.C.13.2
Letter 14:	West of Twin Peaks Central Council, George Wooding, President	III.C.14.7
Letter 15:	Affordable Housing Alliance, Mitchell Omerberg.....	III.15.3
Letter 16:	San Francisco Architectural Heritage, David Cannon, Chair of Issues Committee.....	III.C.16.5
Letter 17:	San Francisco Tomorrow, Jennifer Clary.....	III.C.17.7
C.3	Individuals	
Letter 18:	Marty Walker	III.C.18.2
Letter 19:	Janet Karesh	III.C.19.2
Letter 20:	L. P. De Martini.....	III.C.20.2
Letter 21:	Dorothy Lefkovits	III.C.21.2
Letter 22:	Aaron Goodman	III.C.22.8
Letter 23:	Steve Lawrence	III.C.23.3
Letter 24:	Jim Musselman.....	III.C.24.2
Letter 25:	Daniel W. Phillips	III.C.25.4
Letter 26:	Dr. Terence Faulkner, J.D.	III.C.26.5
Letter 27:	Bernard Choden.....	III.C.27.3
Letter 28:	Bernard Choden and Aaron Goodman	III.C.28.3
Letter 29:	Maria Elena Guerrero Engber and Marigen Hellen Engber de Guerrero	III.C.29.3
Letter 30:	Aaron Goodman	III.C.30.2
Letter 31:	Carla Lehmann	III.C.31.2
Letter 32:	Cathy Lentz	III.C.32.10
Letter 33:	Denis J. Norrington	III.C.33.4
Letter 34:	Daniel W. Phillips	III.C.34.2
Letter 35:	Robin Horner.....	III.C.35.4
Letter 36:	Maria Elena Guerrero Engber and Marigen Hellen Engber de Guerrero	III.C.36.10
Letter 37:	Eileen Boken	III.C.37.3
Letter 38:	Robin Cowen.....	III.C.38.6
Letter 39:	Anthony Pastor, Café Rina.....	III.C.39.3
Letter 40:	Margaret E. Leahy et al.	III.C.40.7
Letter 41:	John Charles Jweinat, and Maha Sami Jweinat, Yousef Realty L.L.C.	III.C.41.4
Letter 42:	Diana Scott and Joel Schechter	III.C.42.2
Letter 43:	Sharon Brock.....	III.C.43.2
Letter 44:	Kenneth Cervisi & Family	III.C.44.5

Letter 45: Marc Christensen.....III.C.45.7
 Letter 46: Lorene Nugent.....III.C.46.2
 Letter 47: Cathy LentzIII.C.47.5
 Letter 48: Leon CowenIII.C.48.2
 Letter 49: Etsuko Sakimura and Yoshiko SakimuraIII.C.49.3
 Letter 50: Julian P. LagosIII.C.50.3
 Letter 51: Lynne Sonenberg.....III.C.51.2
 Letter 52: M. K. VenkatachariIII.C.52.8
 Letter 53: Fiona ZhongIII.C.53.3
 Letter 54: Aaron GoodmanIII.C.54.179

IV. DRAFT EIR REVISIONS.....IV.1

LIST OF FIGURES

Figure C&R.1: Existing and Original Parkmerced Property Boundary..... III.A.4
 Figure V.N.1: Local Geology Map III.A.33
 Figure III.14: Proposed Bicycle Plan (Revised)..... IV.3
 Figure V.E.4: Proposed Transit Improvements (Revised)..... IV.10
 Figure V.E.6: Proposed Bicycle Circulation Improvements (Revised)..... IV.12

I. INTRODUCTION

PURPOSE OF THIS COMMENTS AND RESPONSES DOCUMENT

The purpose of this Comments and Responses (C&R) document is to present comments submitted on the Draft Environmental Impact Report (Draft EIR) for the proposed Parkmerced Project, to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA) Public Resources Code Section 21091 (d)(2)(A) and (B), the City has considered the comments received, evaluated the issues raised, and herein provides written responses that describe the disposition of each environmental issue that has been raised by the commentors. Comments were made in written form during the public comment period from May 12 to July 12, 2010, and as oral testimony received before the Planning Commission at the public hearing on the Draft EIR held on June 17, 2010. A complete transcript of proceedings from the public hearing on the Draft EIR and all written comments are included in their entirety.

ENVIRONMENTAL REVIEW PROCESS

The San Francisco Planning Department prepared the Draft EIR for the Parkmerced Project in accordance with CEQA and the *CEQA Guidelines* in Title 14 of the California Code of Regulations. The Draft EIR was published on May 12, 2010. A public review and comment period was then held from May 12 to July 12, 2010, which exceeds the minimum requirements of CEQA for a 45-day review period, to solicit public comment on the adequacy and accuracy of information presented in the Draft EIR. The comments received during the public review period are the subject of this C&R document, which addresses all substantive written and oral comments on the Draft EIR.

The Draft EIR, together with this C&R document, will be presented to the Planning Commission in an advertised public hearing for certification as a Final Environmental Impact Report if deemed adequate with respect to accuracy, objectiveness, and completeness. The Final EIR will consist of the Draft EIR, the comments received during the public review period, responses to the comments, and any revisions to the Draft EIR that result from public agency and public comments and from staff-initiated text changes. The City decision-makers will consider the certified Final EIR, along with other information and the public process, to determine whether to approve, modify, or disapprove the Proposed Project, and to specify any applicable environmental conditions as part of project approvals in a Mitigation Monitoring and Reporting Program.

If the City decides to approve the Proposed Project with significant effects that are identified in the Final EIR, but which are not avoided or reduced to a less-than-significant level, the City must indicate that any such unavoidable significant effects are acceptable due to overriding

considerations as described in *CEQA Guidelines* Section 15093. This is known as a Statement of Overriding Considerations. In preparing this Statement, the City must balance the benefits of a proposed project against its unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (*CEQA Guidelines* Section 15093). If an agency makes a Statement of Overriding Considerations, the statement must be included in the record of project approval.

DOCUMENT ORGANIZATION

Following this introductory section, Section II presents the List of Commentors. The names of persons who spoke at the public hearing are presented first, in the order of the speakers at the hearing. Written comments follow, organized into three groups: comments from agencies, comments from organizations, and comments from individuals. Within each group, written comments are organized chronologically by the date of the communication, and those with the same date are presented in alphabetical order by the organization's name or commentor's last name.

Section III, Comments and Responses, presents the oral and written comments on the Draft EIR received by the City and responses to the substantive comments they raise. Master Responses, which address issues raised in multiple comments, are presented first, followed by a transcript of the public hearing and responses to these comments. The section concludes with the written comments, each followed by its corresponding responses.

Some responses include revisions or additions to the EIR. Revisions or additions to EIR text are shown as indented text. New or revised text is underlined; deleted material is shown as ~~strikethrough~~ text. The subject matter of one topic may overlap with another, so the reader may occasionally have to refer to more than one group of comments and responses to review all the information on a given subject. Cross-references to other responses are provided in these instances.

Section IV presents text changes to the EIR reflecting both text changes made as a result of a response to comments as well as staff-initiated text changes identified by San Francisco Planning Department staff to update, correct, or clarify the EIR text. The changes have not resulted in significant new information with respect to the proposed project, do not identify any new significant unmitigated environmental impacts, and do not identify new mitigation measures that are not included as part of the Proposed Project. Therefore, recirculation of the Draft EIR pursuant to *CEQA Guidelines* Section 15088.5 is not required.

This C&R document will be incorporated into the Final EIR as a new chapter. The changes to the EIR's text and figures called out in Section III, Comments and Responses, and in Section IV, Draft EIR Text Changes, will be incorporated into the Final EIR text.

II. LIST OF PERSONS COMMENTING

Public agencies, organizations, and individuals submitted written comments (letters, emails, and facsimiles) on the Parkmerced Project Draft EIR, which the City received during the public comment period from May 12 to July 12, 2010. In addition, the Planning Commission held a public hearing about the EIR on June 17, 2010, and Commissioners, organizations, and individuals made oral comments at that hearing. A complete list of commentors, with the corresponding transcript and/or written communication designation for each, is provided below. The names of persons who spoke at the public hearing are presented first, in the order of the speakers at the hearing. Written comments follow, organized into three groups: comments from agencies, comments from organizations, and comments from individuals. Within each group, written comments are organized chronologically by the date of the communication, and those with the same date are presented in alphabetical order by the organization's name or commentor's last name.

PUBLIC HEARING COMMENTS

The following persons made oral comments about the EIR at the public hearing on June 17, 2010:

Designation	Commentor
TR.1	Cathy Lentz
TR.2	Bernie Choden, San Francisco Tomorrow
TR.3	Elizabeth Ranieri
TR.4	Arne Larsen
TR.5	Bert Hill, Board Member, Livable City
TR.6	Jacklynn Jweinat, Yousef Realty
TR.7	Aaron Goodman
TR.8	Julian Lagos
TR.9	Mary Beth Sanders, Co-Chair, Project Review Committee, San Francisco Planning and Urban Research Association
TR.10	Fred Kriebel, Kriebel and Associates
TR.11	Linh Le
TR.12	David Meckel, Director of Research and Planning, California College of the Arts
TR.13	Jim Coppfer
TR.14	Daniel Phillips, President, Board of Directors, Parkmerced Residents Organization

II. List of Persons Commenting

Designation	Commentor
TR.15	Jeremey Setzer
TR.16	Joel Koppel
TR.17	Maria Elena Guerrero Engber
TR.18	Dennis Norrington
TR.19	Kevin McDonough
TR.20	Mitchell Omerberg, Affordable Housing Alliance
TR.21	Michael Pappas, Executive Director, San Francisco Interfaith Council
TR.22	Dr. Terrance Faulkner, J.D.
TR.23	Kate Lefkowitz, Program Manager, San Francisco Housing Action Coalition
TR.24	Dean Preston, Executive Director, Tenants Together
TR.25	Inge Horton, Board of Directors, Sunset Parkside Education and Action Committee
TR.26	Mary Ann Miller, Member of the Board, San Francisco Tomorrow
TR.27	Jeanne D'Arcy
TR.28	Jeanne Scott
TR.29	Maria-Elena Mestayer
TR.30	Judith Flynn, Director, Montessori Children's Center
TR.31	Dan Weaver
TR.32	Nan Roth
TR.33	John Kim
TR.34	Commissioner Christina R. Olague, San Francisco Planning Commission
TR.35	Commissioner Michael J. Antonini, San Francisco Planning Commission
TR.36	Commissioner Hisashi Sugaya, San Francisco Planning Commission
TR.37	Commissioner Kathrin Moore, San Francisco Planning Commission
TR.38	President Ron Miguel, San Francisco Planning Commission

WRITTEN COMMENTS

The following persons submitted written comments about the EIR during the public comment period of May 12 to July 12, 2010:

Designation	Commentor	Date of Written Comments
Agencies		
1	Department of Transportation, Lisa Carboni, District Branch Chief, Local Development – Intergovernmental Review	June 28, 2010
2	National Trust for Historic Preservation and the California Preservation Foundation, Anthea M. Hartig, Ph.D., Director, Western Office, National Trust for Historic Preservation, and Cathy Heitzman, Executive Director, California Preservation Foundation	June 29, 2010
3	Office of Historic Preservation Department of Parks and Recreation, Milford Wayne Donaldson, FAIA, State Historic Preservation Officer	July 9, 2010
4	San Francisco County Transportation Authority, Tilly Chang, Deputy Director for Planning	July 12, 2010
5	Historic Preservation Commission, San Francisco Planning Department	July 17, 2010
Organizations		
6	San Francisco Planning + Urban Research Association, Charmaine Curtis, Mary Beth Sanders, Reuben Schwartz, SPUR Project Review Committee Co-Chairs	May 27, 2010
7	The San Francisco Preservation Consortium, Vincent Marsh, Acting Chair	May 31, 2010
8	Montessori Children's Center, Judith Flynn, Director	June 17, 2010
9	Lakeshore Acres Improvement Club, Chris S. Manitsas	June 21, 2010
10	Sunset Parkside Education and Action Committee, Marc Duffett, President	June 21, 2010
11	Lakeshore Acres Improvement Club, Bruce H. Selby	June 23, 2010
12	Sierra Club, San Francisco Group, Howard Strassner, Emeritus Chair, Transportation Committee	July 6, 2010
13	Merced Extension Triangle Neighborhood Association, Glen Hatakeyama	July 7, 2010
14	West of Twin Peaks Central Council, George Wooding, President	July 11, 2010
15	Affordable Housing Alliance, Mitchell Omerberg	July 12, 2010

II. List of Persons Commenting

Designation	Commentor	Date of Written Comments
16	San Francisco Architectural Heritage, David Cannon, Chair of Issues Committee	July 12, 2010
17	San Francisco Tomorrow, Jennifer Clary	July 12, 2010
Individuals		
18	Marty Walker	
19	Janet Karesh	May 27, 2010
20	L. P. De Martini	May 28, 2010
21	Dorothy Lefkovits	June 3, 2010
22	Aaron Goodman	June 8, 2010
23	Steve Lawrence	June 6, 2010
24	Jim Musselman	June 12, 2010
25	Daniel W. Phillips	June 13, 2010
26	Dr. Terence Faulkner, J.D.	June 14, 2010
27	Bernard Choden	June 16, 2010
28	Petition submitted individually by the following persons: Bernard Choden Aaron Goodman	June 16, 2010 June 19, 2010
29	Maria Elena Guerrero Engber and Marigen Hellen Engber de Guerrero	June 17, 2010
30	Aaron Goodman	June 17, 2010
31	Carla Lehmann	June 17, 2010
32	Cathy Lentz	June 17, 2010
33	Denis J. Norrington	June 17, 2010
34	Daniel W. Phillips	June 17, 2010
35	Robin Horner	June 23, 2010
36	Maria Elena Guerrero Engber and Marigen Hellen Engber de Guerrero	June 25, 2010
37	Eileen Boken	June 28, 2010
38	Robin Cowen	June 29, 2010

II. List of Persons Commenting

Designation	Commentor	Date of Written Comments
39	<p>Letter submitted individually by the following business owners from the Parkmerced Shopping Center:</p> <p><i>Café Rina:</i></p> <ul style="list-style-type: none"> • Anthony Pastor • Reina Pastor <p><i>Frozen Cup:</i></p> <ul style="list-style-type: none"> • Terry Walker <p><i>Herb N' Legend:</i></p> <ul style="list-style-type: none"> • Samer Jweinat • Naji El-khuri (also for Hall of Flame Burgers) <p><i>Hall of Flame Burgers:</i></p> <ul style="list-style-type: none"> • Basil El-khuri • Ramzi El-khuri <p><i>Manuia Polynesian Dance Studio:</i></p> <ul style="list-style-type: none"> • Kay Tualauddlei • Tommy Tualauddlei <p><i>Papa John's Pizza:</i></p> <ul style="list-style-type: none"> • Paul Shamieh • Yousef Shamieh <p><i>Park Plaza Fine Foods:</i></p> <ul style="list-style-type: none"> • John Jweinat • Maha Jweinat <p><i>Parkmerced Postal Service:</i></p> <ul style="list-style-type: none"> • Jamie Jweinat <p><i>Parkmerced Sports Club:</i></p> <ul style="list-style-type: none"> • Angelo N. Basso • Gaetano Basso • Thomas Basso <p><i>Parkmerced Tacqueria:</i></p> <ul style="list-style-type: none"> • Peter Foundas • Vincent Schofield • Tim Drolapas <p><i>Promax Martial Arts Academy:</i></p> <ul style="list-style-type: none"> • Al Castillo • Perla J. Castillo <p><i>Wash N' Dry Laundry:</i></p> <ul style="list-style-type: none"> • Tim Drolapas (submitted letter twice) 	July 1, 2010
40	Margaret E. Leahy et al.	July 1, 2010
41	<p>Letter submitted individually by the following persons:</p> <p>John Charles Jweinat, Yousef Realty L.L.C. Maha Sami Jweinat, Yousef Realty L.L.C.</p>	July 1, 2010

II. List of Persons Commenting

Designation	Commentor	Date of Written Comments
42	Diana Scott and Jole Schechter	July 5, 2010
43	Sharon Brock	July 7, 2010
44	Kenneth Cervisi & Family	July 7, 2010
45	Marc Christensen	July 7, 2010
46	Lorene Nugent	July 7, 2010
47	Cathy Lentz	July 8, 2010
48	Leon Cowen	July 11, 2010
49	Etsuko Sakimura and Yoshiko Sakimura	July 11, 2010
50	Julian P. Lagos	July 12, 2010
51	Lynne Sonenberg	July 12, 2010
52	M. K. Venkatachari	July 12, 2010
53	Fiona Zhong	July 12, 2010
54	Aaron Goodman	July 12, 2010

III. COMMENTS AND RESPONSES

Section III, Comments and Responses, presents the oral and written comments on the Draft EIR received by the City and responses to the comments that raise substantive environmental issues related to the Proposed Project. In a few cases, more than one commentor submitted the same letter or petition. Duplicate communications are shown only once, but the names of all the commentors who submitted a particular set of written comments are listed, where practical, before the first response, as well as in Section II.

The section begins with four Master Responses, which address issues raised in multiple comments. The Master Responses address the topics of Historic Resources, Transportation, Seismic Hazards, and Alternatives. Public hearing comments are then presented in the form of a transcript of the hearing, and responses to these comments begin at the end of the transcript. Written comments follow, organized into three groups: comments from agencies, comments from organizations, and comments from individuals. Within each group, written comments are organized chronologically by the date of the communication, and those with the same date are presented in alphabetical order by the organization's name or commentor's last name. These communications are presented in their entirety, and each written communication is followed by responses to the substantive comments raised. Each set of responses follows the order of the commentor's public hearing or letter comments, and each response is prefaced by a comment code that ties it to its corresponding bracketed comment.

Each comment in the transcript and written comments that raises a substantive environmental issue related to the Proposed Project is bracketed and coded. Public hearing comments are coded as "TR" for transcript, a number that reflects the sequential order of the speakers, and a sequential comment number. (For example, the first comment made by the fourth speaker is coded as TR.4.1.) Letters and other written communications are sequentially numbered throughout Section III, and each bracketed comment within the letter is also sequentially numbered. (For example, the third bracketed comment in the fifth letter is coded as 5.3.) Each response is preceded by the code of the comment to which it corresponds. Statements made during the public hearing and in written comments that do not relate to the Proposed Project or do not raise potential environmental issues have not been bracketed and are not responded to in this C&R document. Those statements may be taken into consideration by decisionmakers during their deliberations on the approval actions requested by the Project Sponsor, to the extent that they are relevant to the Proposed Project.

III.A MASTER RESPONSES

Many comments on the Parkmerced Draft EIR raise the same or similar issues about a topic. This section contains four “Master Responses” that provide a comprehensive discussion of the issues and themes expressed in these comments. The Master Responses and topics addressed are listed below.

- Master Response A.1: Historic Resources
 - Definition of the Historic Resource and District Boundaries
 - Social Significance and Evaluation of Parkmerced as Cultural Landscape
 - Cumulative Impacts on Thomas Church-Designed Housing Complexes
 - Adequacy of Historic Architectural Resources Mitigation Measures
 - Demolition of Historic Resources
 - Parkmerced as a “Work of a Master”
 - Past Historical Studies of Parkmerced
- Master Response A.2: Transportation
 - Travel Demand Forecasting
 - Transportation Analysis
 - Funding for Project Infrastructure Improvements
- Master Response A.3: Seismic Hazards
 - Proposed Project Development
 - Safety of the Existing Residential Towers
- Master Response A.4: Alternatives
 - Requirements for Alternatives in EIRs
 - Alternatives Suggested in Comments
 - Alternatives Supported in Comments
 - Feasibility of Alternatives

MASTER RESPONSE A.1: HISTORIC RESOURCES

1. INTRODUCTION

Due to the level of interest by the public and the number of comment letters received, many comments raise similar issues related to historic resources that are more easily addressed in a Master Response rather than individual responses to each letter. This Master Response addresses these issues.

The main points raised in the comments on historic resources fall into the following categories, each addressed in a corresponding section of this Master Response:

- Definition of the Historic Resource and District Boundaries;
- Social Significance and Evaluation of Parkmerced as Cultural Landscape;
- Cumulative Impacts on Thomas Church-Designed Housing Complexes;
- Adequacy of Historic Architectural Resources Mitigation Measures;
- Demolition of Historic Resources;
- Parkmerced as a “Work of a Master”; and
- Past Historical Studies of Parkmerced.

The EIR discusses Historic Resources in detail in Section V.D.a, Historic Architectural Resources, pp. V.D.1-V.D.29. The findings provided in the EIR are based upon the *Parkmerced Historic Resource Evaluation & Cultural Landscape Assessment* (HRE) and *Historic Resources Alternatives Study*, both published on November 13, 2009, and cited in the EIR.

2. DEFINITION OF HISTORIC RESOURCE AND DISTRICT BOUNDARIES

The following comments discuss the definition of the historic resource and district boundaries and are responded to either entirely or in part in this Master Response: TR.7.3, TR.7.4, 2.1, 5.1, 22.2, 54.A.6, 54.A.19, 54.A.21, 54.A.29, 54.A.36, 54.A.40, 54.A.41, 54.A.43, 54.A.45, 54.C.17, and 54.C.30.

These comments assert that the Draft EIR does not provide sufficient information on the historic resources at the Project Site, as well as on the boundaries of the identified potential historic district. Many comments question the Draft EIR’s conclusions regarding which features contribute to the historic district and the extent of the potential historic district boundaries. The comments request a visual and narrative description of the district boundaries. Some comments question the adequacy of the research for the HRE, which was the basis of the Draft EIR Historic Architectural Resources section. Also, some comments correctly identify that a historic resource, under CEQA, does not distinguish between being eligible for, and being listed in the California Register of Historical Resources. Comments also assert that the evaluation of the Proposed

III. Comments and Responses

A. Master Responses

A.1: Historic Resources

Project did not examine the effects of the Proposed Project within the boundaries of the proposed historic district.

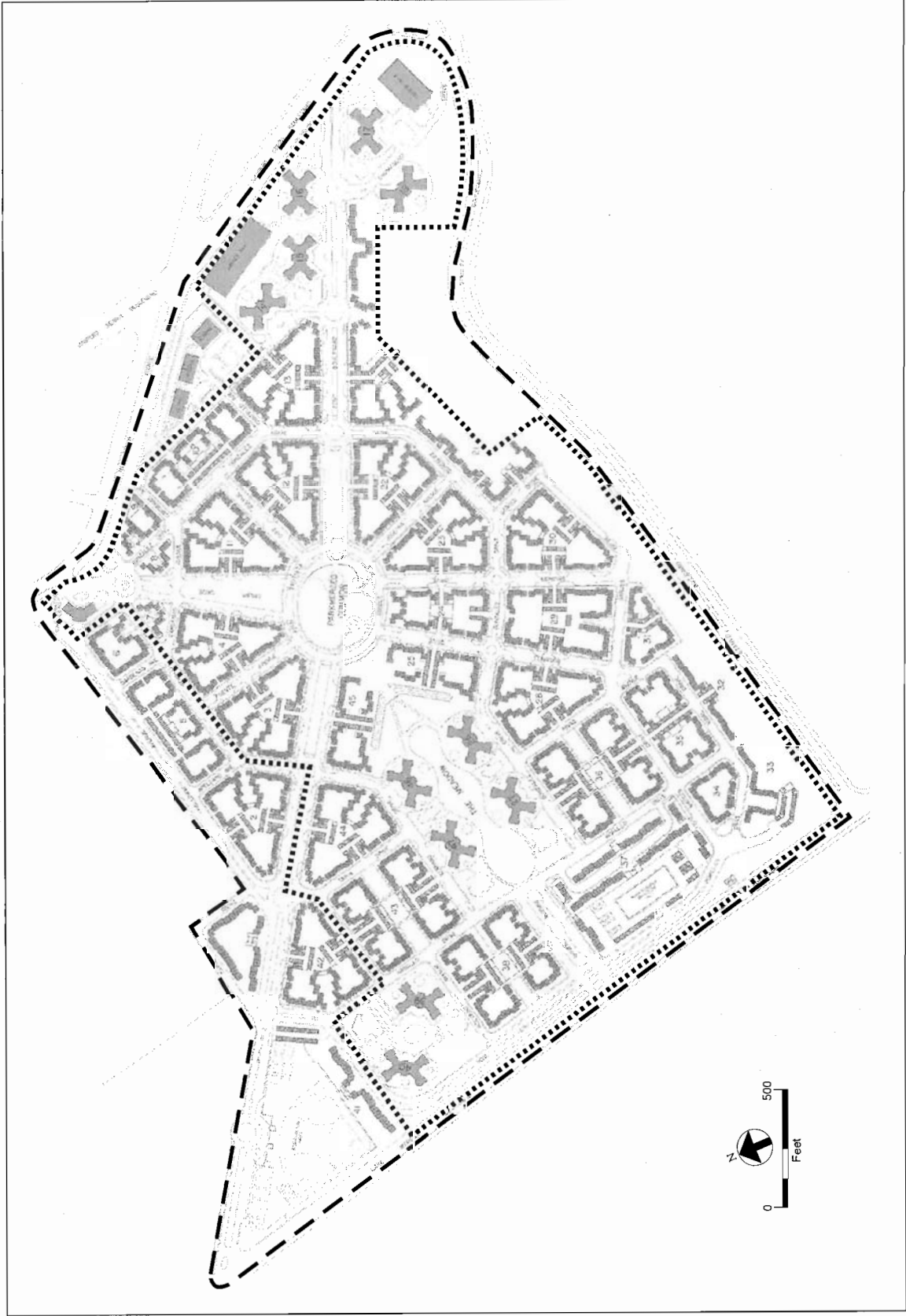
Under CEQA, the environmental review of a proposed project must examine the project site and vicinity for potential historic resources that could be affected by the Proposed Project, and assess their eligibility for listing in the California Register of Historical Resources. The EIR and the associated technical reports, including the HRE, identify the existing Parkmerced housing complex as a historic resource on the Project Site. As noted in the HRE:

Parkmerced would be classified as a district under the National Register, since it “possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development. As previously specified, Parkmerced developed from 1941 to 1951 and is composed of several buildings, structures, sites, objects, and landscape features. The boundaries of this district would be based upon its historical association and shared relationships, and include the area bounded by Lake Merced Boulevard, Font Boulevard (including Tapia Drive), Holloway Boulevard, Nineteen Avenue, Junipero Serra Boulevard, and Stanley Boulevard.¹

As indicated by the above quote, the boundaries of the historic district encompass the Parkmerced development as conceived in 1951. (See Figure C&R.1: Existing and Original Parkmerced Property Boundary.) Specifically, the historic district boundaries start at the southwest intersection of 19th Avenue and Holloway Avenue, run west along Holloway Avenue, turn north on and around the south/east side of Tapia Drive, then run northwest along Font Boulevard, turn south on Lake Merced Boulevard, then east on Brotherhood Way, then north on Junipero Serra Boulevard to 19th Avenue. Therefore, the potential Parkmerced Historic District boundaries encompass all parts of the original Parkmerced property, including those portions currently owned by other entities, such as the vacant property at 800 Brotherhood Way and the portions owned by San Francisco State University.

The EIR identifies Parkmerced as a historic district that is eligible for inclusion in the California Register under Criterion 1 (Events) and Criterion 3 (Design/Construction) with a period of significance from 1941 to 1951 (see Section V.D.a, Historic Architectural Resources, p. V.D.26). The EIR does not differentiate between being eligible and being listed in a historic resource inventory; both classifications are considered historic resources for the purposes of CEQA and this EIR’s analysis. For the purposes of CEQA, the Project Site was considered a historic resource.

¹ Page & Turnbull, *Parkmerced Historic Resource Evaluation & Cultural Landscape Assessment*, November 13, 2009, p. 63.



SOURCE: Page & Turnbull, Turnstone Consulting
PARKMERCED PROJECT
 EXISTING PROJECT SITE BOUNDARY - - - HISTORIC DISTRICT BOUNDARY
 - - - - - ORIGINAL PARKMERCED PROPERTY BOUNDARY
C&R FIGURE 1: EXISTING AND ORIGINAL PARKMERCED PROPERTY BOUNDARY

The character-defining features of the potential Parkmerced Historic District identified on pp. V.D.16-V.D.18 of the Draft EIR and in the HRE include the following:

Spatial Organization

- Overall site plan, includes street grid, placement of buildings in blocks, the Meadow, and the Commons
- Garden apartment blocks and courtyards (interior, entry, and laundry)
- Tower arrangement and courtyards

Cluster Arrangement

- Garden apartment blocks
- Tower clusters

Circulation

- Landscaped drives
 - Font Boulevard
 - Crespi Drive
 - Bucareli Drive
 - Grijalva Drive
- Juan Bautista Circle
- Traffic circles
- Aggregate and concrete paths (in courtyards and between buildings)

Topography

- Individual garden apartment courtyard grading

Buildings and Structures

- Garden apartments
- Towers
- Maintenance building
- Administration building
- Carports
- Laundry buildings
- Storage buildings

Vegetation

- Location and rhythm of street trees and plantings along drives and secondary streets, garden courtyard apartments, and towers
- Placement of specimen trees, lawns, and vegetation in courtyards of garden apartments and towers (actual species of vegetation has been altered in certain

III. Comments and Responses

A. Master Responses

A.1: Historic Resources

cases; this character-defining feature should be evaluated on case-by-case basis)

- The Commons plantings
- Ornamental median plantings in traffic circles and along landscaped drives, where remaining

Landscape Features

- Terrace divider walls in courtyards
- Planters (concrete, wood and brick)
- Low concrete and/or brick site walls
- Courtyard stairs (brick and concrete)

Views and Vistas

- Vistas down landscaped drives (see circulation above)
- Vistas to and from garden apartment courtyard breezeways
- Views to and from the Commons
- Views from the ground-floor-level of mid-rise towers to garden apartments and landscape

The character-defining features were identified by the HRE consultant using the cultural landscape methodology defined by the National Park Service. These character-defining features were further developed by the San Francisco Planning Department.² Overall, the EIR provides sufficient information regarding the definition of the historic resource on the Project Site.

Furthermore, the evaluation of Parkmerced as a historic resource follows accepted standards for evaluating potential historic resources. As noted in the HRE, pp. 4-5:

The purpose of this Historic Resource Evaluation Report and Cultural Landscape Assessment is to evaluate Parkmerced for its eligibility as a historic district (and subsequently a cultural landscape), determine whether or not the property is a historic resource as defined by the California Environmental Quality Act (CEQA), and to analyze the proposed project for its impacts upon any qualified historic resources on the project site. The methodology for this report was developed with assistance from the City of San Francisco Planning Department and according to the following National Park Service (NPS) bulletins and guidelines:

- The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes,

² San Francisco Planning Department Memo, Re: Case No. 2008.0021E: Comments on the Draft “Historic Resource Evaluation and Cultural Landscape Assessment,” from Sophie Middlebrook, Preservation Technical Specialist to Rick Cooper, Major Environmental Analysis (July 2, 2009).

III. Comments and Responses

A. Master Responses

A.1: Historic Resources

- National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation;
- National Register Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes;
- National Register Bulletin: Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places;
- Historic Residential Suburbs in the United States: 1830-1960 - Multiple Property Documentation Form; and
- A Guide to Cultural Landscape Reports: Content, Process, Technique.

Page & Turnbull also consulted the State of California's Office of Historic Preservation (OHP) bulletin: California Office of Historic Preservation Technical Assistance Series #7: How to Nominate a Resource to the California Register of Historical Resources. The publications listed above outline the commonly accepted methodologies for evaluating the significance of cultural landscapes and, more specifically, designed residential communities in the United States. As stated within California Office of Historic Preservation Technical Assistance Series #7: How to Nominate a Resource to the California Register of Historical Resources, further information on applying and interpreting the California Register criteria may be obtained from California Office of Historic Preservation Technical Assistance Series #6: California Register and National Register: A Comparison, and National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.

The publications listed above outline the commonly accepted methodologies for evaluating the significance of cultural landscapes and, more specifically, designed residential communities in the United States.

Survey methodology is also discussed in the HRE, p. 48:

In August 2007, Page & Turnbull completed a reconnaissance-level survey of Parkmerced. This survey examined the current condition of the site as a whole and the property's historic integrity. The team conducted the survey according to the eleven cultural landscape characteristics defined by the NPS as outlined in the following publications:

- How to Evaluate and Nominate Designed Historic Landscapes (Bulletin 18);
- Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places;
- The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes; and
- A Guide to Cultural Landscape Reports: Contents, Process, and Techniques.

Survey data was collected on a block-by-block basis, and focused on common building types and landscape features. Detailed analysis of individual buildings and landscape features was not within the scope of this survey, nor was the survey meant to provide comprehensive intensive-level documentation of all individual site features. Survey forms were completed in the field for each of the forty-seven residential blocks, as well as for associated service buildings and open spaces. Digital photographs were taken to provide an overview of the common characteristics of each block. The products of this survey are included in the appendices.

As part of the reconnaissance survey, the HRE examined the entire original Parkmerced complex, including those properties not currently owned by the Project Sponsor. The HRE provided information on the classification of the historic resource, and also determined that none of the resources on the Project Site would be individually distinctive in their own right (see HRE, p. 64). This information was factored in to the definition of the property's character-defining features and evaluation for the California Register. The additional information provided by the comments, including the article entitled "Metropolitan Life Makes Housing Pay – 'How To Order A City'," does not present any new information that is not already addressed within the HRE, and does not affect the identification of historic resources on the Project Site.

Therefore, the EIR and the HRE provide sufficient definition of the historic resources present at the Project Site, including the boundaries of the potential historic district and its associated character-defining features.

3. SOCIAL SIGNIFICANCE AND EVALUATION OF PARKMERCED AS CULTURAL LANDSCAPE

The following comments discuss the significance and evaluation of Parkmerced as a cultural landscape and are responded to either entirely or in part in this Master Response: 5.2, 22.1, 28.2, 54.A.5, 54.A.24, and 54.C.13.

The comments assert that the Draft EIR does not sufficiently discuss the social significance of Parkmerced as a historic rental community, and that Parkmerced was not sufficiently evaluated as a cultural landscape. These comments also assert that the original purpose of Parkmerced was not fully investigated in the Draft EIR. The comments also state that the HRE inadequately evaluates the landscape gardens of Parkmerced's internal and external courtyards.

The EIR, Section V.D.a, Historic Architectural Resources, p. V.D.26, identifies Parkmerced as a historic district that is eligible for inclusion in the California Register under Criterion 1 (Events) and Criterion 3 (Design/Construction) with a period of significance from 1941 to 1951. The significance of Parkmerced is defined in detail on pp. V.D.18-V.D.26.

Parkmerced is identified and evaluated as a cultural landscape in the HRE (pp. 51-62). As noted in the HRE on p. 51:

According to the NPS, a cultural landscape is defined as, “a geographic area, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values.”³ The NPS defines a historic district as an area that “possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”⁴ Parkmerced possesses many characteristics that define the site as a cultural landscape, including the character of the property as an organization of clusters of buildings and structures around a series of open spaces, made accessible via vehicular and pedestrian circulation systems and accentuated by vegetation and small-scale features associated with the property. According to the NPS definitions above, the property may be identified as a historic district because it is a single site that includes a significant concentration of buildings, structures, and objects. The property’s potential significance as a historic district is linked to its character as a cultural landscape, which assists in defining those qualities of the site and landscape, which may be considered significant. For the purposes of this study, the property’s cultural landscape characteristics will also constitute the character of the property as a historic district.

Subsequent to this discussion, the HRE assesses the property’s cultural landscape characteristics, including the Natural Systems & Features, Spatial Organization, Cluster Arrangement, Circulation, Topography, Vegetation, Building and Structures, Views and Vistas, and Small-Scale Features. As part of the cultural landscape evaluation, Parkmerced’s internal and external courtyards were identified as a character-defining feature of the cultural landscape and historic district (see character-defining features of the Parkmerced Historic District listed above on pp. III.A.5-III.A.6). Thus, the HRE and the EIR adequately address the evaluation of Parkmerced as a cultural landscape, as defined by the National Park Service.

In addition to the evaluation of the site as a cultural landscape, comments suggest that the Draft EIR does not adequately evaluate the social significance of Parkmerced. The social significance of Parkmerced is defined in the historic context in Section III. Historic Context, in the HRE, pp. 13-45. This historic context includes descriptions of the following:

- Early Site History;
- Development of Parkmerced: Phase I (1941 to 1945), including Site Planning and Landscaping;
- Development of Parkmerced Phase II (1948 to 1951);
- Contextual Planning History, including The Garden City, LeCorbusier’s Ideal City, New Deal Housing Initiatives, and Greenbelt Towns;

³ Birnbaum, 4.

⁴ National Park Service, “How to Apply the National Register Criteria for Evaluation,” *National Register Bulletin*. 15, 2002.

III. Comments and Responses

A. Master Responses

A.1: Historic Resources

- Bay Area Housing Context, including Public Housing and Low-Income Housing Projects, Defense Housing Projects, Private Investment and Middle-Income Housing Projects;
- Metropolitan Life Insurance Company-History and Development, including MetLife Insurance Company Projects in California;
- Related Properties Listed in the National Register of Historic Places;
- Leonard Schultze (architect of Parkmerced);
- Thomas Church (landscape architect of Parkmerced);
- Frederick Meyer (associated architect of Parkmerced); and
- Starrett Brothers & Eken (general contractor of Parkmerced).

The HRE historic context examines the original purpose of Parkmerced as a middle-income postwar housing project, and as San Francisco's first all-rental housing community (HRE, pp. 14-33). This information was factored in to the significance statement of the historic district, which includes the social significance of Parkmerced. Specifically, the HRE discusses the social significance of Parkmerced in the historic context of private investment and middle-income housing projects, and within a portion of the significance statement, which states:

Parkmerced reflects an important historic trend in the development of middle-income housing in San Francisco, and is representative of one of the earliest wartime planned residential communities within San Francisco and the Bay Area. After World War II, the need for housing within the Bay Area reached new heights with housing vacancy rates dropping from 8.6 percent to 1 percent. During this time, government agencies and private investors sought to rectify this problem by building new housing developments, which were targeted towards certain sectors of the population, including low-income families, middle-income families, and the military. In response to this housing demand, the first phase of Parkmerced was commissioned to capture the housing fervor that occurred across the Bay Area. Approximately twenty-eight housing developments of varying scales (from approximately one hundred units to approximately 3,500 units) were constructed in communities, including San Francisco, Richmond, Oakland, and Vallejo. As wartime restrictions and housing demands further increased, MetLife responded to the regional need for higher density housing with the construction of second phase of Parkmerced, which included high-rise towers and additional garden court apartments. Parkmerced is significant within this context as a local representative of the nationwide housing boom that occurred during and after World War II.⁵

Therefore, the EIR and the associated technical studies which are part of the administrative record adequately address the significance of the historic resources present on the Project Site, and also adequately identify the site as a cultural landscape. The associated technical studies are part of the administrative record for the Proposed Project.

⁵ HRE, pp. 64-65.

4. CUMULATIVE IMPACTS ON THOMAS CHURCH-DESIGNED HOUSING COMPLEXES

The following comments discuss the cumulative impacts of the Proposed Project on Thomas Church-designed housing complexes and are responded to either entirely or in part in this Master Response: TR 7.4 and 5.4.

The comments suggest that the Draft EIR should analyze a potential cumulative impact centered on Thomas Church's large-scale landscape architecture planning projects.

Impact CR-2, on p. V.D.29 of the EIR, identifies one significant and unavoidable cumulative impact to historic resources:

The proposed demolition of the existing garden apartment buildings and removal of existing landscape features on the Project Site would contribute to a cumulative impact on the historic significance of the Parkmerced historic district historical resource.

CEQA defines cumulative impacts as follows:

“Cumulative impacts” refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- a) The individual effects may be changes resulting from a single project or a number of separate projects.
- b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.⁶

The Proposed Project would not contribute to any additional cumulative impacts upon historic resources. CEQA requires analysis of potential cumulative impacts to historic resources, which may include buildings, potential geographically related districts or cultural landscapes (such as here), among other types of resources.

The demolition of a portion of Parkmerced is not considered to be a cumulative impact upon Thomas Church-designed large-scale landscape architecture planning projects because Thomas Church's body of work is not considered in itself to be one historic resource for the purposes of CEQA. For a cumulative impact upon this historic resource to exist, all of Thomas Church's large-scale housing projects would need to be considered an historic resource eligible for listing in the California Register of Historical Resources, for the purposes of CEQA. Therefore, the EIR

⁶ *CEQA Guidelines*, Article 20, subsection 15355.

identifies of cumulative impacts caused by the Proposed Project, as related to identified Historic Architectural Resources.

Table 2 in the HRE, p. 35, includes reference to a number of Bay Area housing projects constructed during the same time as Parkmerced, from 1940 to 1951. This table was provided to fit Parkmerced within the context of other larger-scale housing developments occurring during the postwar era, and to show Parkmerced as an important example in the emerging trend of development of middle-income housing. Of the twenty-eight housing developments examined in the HRE for the significance evaluation, Thomas Church was involved in five large-scale housing projects. Of these five projects, the Vallejo Defense Worker's Housing, North Beach Place, and Valencia Gardens have since been demolished, while Sunnydale still exists. As stated in the HRE, Thomas Church was most likely engaged to work on these projects because of his work on smaller-scale gardens in Northern California (HRE, p. 34). Thomas Church was a landscape architect recognized for his celebrated residential gardens and the development of the 'California Style' of landscape design (HRE, p. 41). Church's practice mainly focused upon private residential gardens, as best exemplified by his work on the Donnell Garden in Sonoma. Some of Church's larger scale work, like Parkmerced, shows this design aesthetic and methodology that was typically found in his smaller-scale residential work.

To identify the demolition of Parkmerced as contributing to a cumulative impact to Church's entire body of work, his body of work would have to be considered an historic resource under CEQA. This is not appropriate because his body of work is spread out across California and the United States, lacks cohesion as a whole, encompasses a range of types of work from landscapes for individual private homes to landscapes and site planning for large public sites, and occurs at different points of time. Additionally, his body of work would need to be weighed and evaluated to ascertain a trend in the demolition and/or alteration of his properties.

5. ADEQUACY OF HISTORIC ARCHITECTURAL RESOURCES MITIGATION MEASURES

The following comments discuss the adequacy of the historic architectural resources mitigation measures and are responded to either entirely or in part in this Master Response: 2.8, 3.1, 5.6, 16.8, 54.A.22, 54.A.23, and 54.A.38.

These comments assert that the Draft EIR does not include sufficient mitigation measures for the impacts to historic architectural resources, and that these mitigation measures would not reduce the impacts upon historic resources to a less-than-significant level. The comments also assert that additional mitigation measures should be included in the EIR to prevent demolition until a replacement project is approved. These comments assert that the mitigation measures for impacts to historic architectural resources should include standards for production/implementation and be refined to focus not only on architecture, but also on landscape resources.

III. Comments and Responses
A. Master Responses
A.1: Historic Resources

As described in the EIR in Section V.D.a, Historic Architectural Resources, pp. V.D.28-V.D.29, Mitigation Measure M-CR-1 would reduce the adverse impacts of the Proposed Project, but not to a less-than-significant level. The Proposed Project would still result in significant and unavoidable impacts to qualified historic resources present on the Project Site. Specifically, the Proposed Project would demolish a portion of a historic resource that justifies inclusion of the resource in the California Register of Historical Resources. Demolition of a historic resource cannot be mitigated to a less-than-significant level.

Several of the comments propose revisions to the existing mitigation measures for impacts to historic architectural resources. Some of the recommendations from the comments address appropriate review and additional standards, and accordingly the mitigation measures have been revised to include the proposed changes as well as to address landscape resources, in addition to the architectural resources. The EIR includes the following revisions to Mitigation Measure M-CR-1 in the Draft EIR and additional mitigation measures. These modifications to the mitigation measure in the Draft EIR assist in reducing the impacts, but would not reduce the impacts to a less-than-significant level and do not change the conclusions of the EIR. The Proposed Project would still have a significant, direct and cumulative, unavoidable impact on historic resources at the Project Site.

Mitigation Measure M-CR-1, on pp. V.D.28-V.D.29, has been refined as follows:

Documentation

The Project Sponsor shall retain a professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History to prepare written and photographic documentation of the Parkmerced complex within the Project Site.

The documentation for the property shall be prepared based on the National Park Service's (NPS) Historic American Building Survey (HABS) / Historic American Engineering Record (HAER) Historical Report Guidelines, and will include a selection of measured drawings based upon NPS Historic American Landscape Survey (HALS) Guidelines. This type of documentation is based on a combination of both HABS/HAER standards (Levels I, II and III) and NPS's policy for photographic documentation as outlined in the National Register of Historic Places and National Historic Landmarks Survey Photo Policy Expansion.

The measured drawings for this documentation shall follow HALS Level I standards. To determine the number of the measured drawings, the professional shall consult with the San Francisco Planning Department's Preservation Coordinator.

The written historical data for this documentation shall follow HABS / HAER Level II standards. The written data shall be accompanied by a sketch plan of the property. Efforts should also be made to locate original construction drawings or plans of the property during the period of significance. If located, these drawings should be photographed, reproduced, and included in the dataset. If construction drawings or plans cannot be located, as-built drawings shall be produced.

Either HABS/HAER standard large format or digital photography shall be used. If digital photography is used, the ink and paper combinations for printing photographs must be in

III. Comments and Responses

A. Master Responses

A.1: Historic Resources

compliance with NR-NHL Photo Policy Expansion and have a permanency rating of approximately 115 years. Digital photographs will be taken as uncompressed, TIF file format. The size of each image will be 1600x1200 pixels at 330 ppi (pixels per inch) or larger, color format, and printed in black and white. The file name for each electronic image shall correspond with the index of photographs and photograph label.

Photograph views for the dataset shall include (a) contextual views; (b) views of each side of each building and interior views, where possible; (c) oblique views of buildings; and (d) detail views of character-defining features, including features on the interiors of some buildings. All views shall be referenced on a photographic key. This photographic key shall be on a map of the property and shall show the photograph number with an arrow to indicate the direction of the view. Historic photographs shall also be collected, reproduced, and included in the dataset.

The Project Sponsor shall transmit such documentation to the History Room of the San Francisco Public Library, and to the Northwest Information Center of the California Historical Information Resource System.

All documentation will be reviewed and approved by the San Francisco Planning Department's Preservation Coordinator prior to granting any demolition permit.

Interpretation

The Project Sponsor shall provide a permanent display of interpretive materials concerning the history and architectural features of the original Parkmerced complex within public spaces of the Project Site. Interpretation of the site's history shall be conducted and written by an architectural historian or historian, who meets the Secretary of the Interior's Professional Qualification Standards, and shall be conducted in coordination with an exhibit designer. The interpretative materials should be placed in a prominent public setting and be permanent. The specific location, media, and other characteristics of such interpretive display shall be approved by the Historic Preservation Commission San Francisco Planning Department's Preservation Coordinator prior to any demolition or removal activities.

Archives

The Project Sponsor shall donate original Leonard Schultze and Thomas Church architectural drawings of Parkmerced to the University of California, Berkeley Environmental Design Archives. Confirmation from UC Berkeley shall be received and the San Francisco Planning Department's Preservation Coordinator shall be notified.

Mitigation measures governing the demolition of existing resources on the Project Site and the approval of a replacement project are not necessary, since these provisions are part of the San Francisco Planning Code and the Proposed Project's review process. To provide clarification in the Draft EIR, Section V. Environmental Setting and Impacts, D.a. Historic Architectural Resources, Impact CR-1, the first full paragraph on p. V.D.28, has been revised as follows:

This significant impact is considered unavoidable because no feasible mitigation is available that would preserve the essential integrity of the Parkmerced complex yet allow the Proposed Project to be substantially implemented. Demolition of most of this historical resource is necessary to implement the Proposed Project and realize the majority of its objectives. Pursuant to the San Francisco Planning Code Section 317.d(1), the Proposed Project will not be issued a demolition permit until a building permit for the replacement buildings are finally approved. Note, however, that full and partial retention schemes for this historical resource

are analyzed as alternatives to the Proposed Project in Chapter VII, Alternatives to the Proposed Project, in this EIR.

6. DEMOLITION OF HISTORIC RESOURCES

The following comments discuss the demolition of a historic resource and are responded to either entirely or in part in this Master Response: TR.32.2 and 10.8.

These comments assert that demolition of the historic landscape at Parkmerced would mean a significant loss in cultural resources at the Project Site. The EIR, p. V.D.27, concludes that the Proposed Project would have a significant and unavoidable adverse impact upon a qualified historic resource on the Project Site. Specifically, the proposed demolition of the existing garden apartment buildings and removal of existing landscape features on the Project Site would impair the historical significance of the Parkmerced historic district historical resource. The EIR identifies some of the vegetation and landscape features as character-defining features of the Parkmerced complex (pp. V.D.16-V.D.18). In the discussion of eligibility for the California Register, the EIR discusses the landscape as a design feature and as part of the material relevant to integrity (pp. V.D.21-V.D.26). The EIR concludes that Parkmerced is eligible for inclusion in the California Register as a historic district, taking into account cultural landscape, among other things (p. V.D.26). Therefore, these comments are in agreement with the conclusions of the Draft EIR.

7. PARKMERCED AS A “WORK OF A MASTER”

The following comment discusses the significance of Parkmerced as a “work of a master” and is responded to either entirely or in part in this Master Response: 54.A.22.

This comment asserts that the Draft EIR does not provide a sufficient analysis to conclude Parkmerced is significant as the “work of a master,” Thomas Church. The comment asserts that the Draft EIR does not provide sufficient contextual information on Thomas Church’s work to support the conclusion that the Parkmerced garden designs are an insignificant example of his body of work.

The descriptions on p. V.D.20 of the EIR and p. 66 of the HRE identify Parkmerced as a “work of a master” that is significant under California Register Criterion 3 (Design/Construction).

Specifically, the HRE states:

Parkmerced appears significant under Criterion C (Design/Construction) within the areas of community planning and development, and landscape architecture as an example of a post-war planned residential community in San Francisco with site planning and building designs by Leonard Schultze & Associates, and landscape designs by Thomas Church. Parkmerced is significant under Criterion C (Design/Construction) as a resource that represents the work of masters, Leonard

Schultze and Thomas Church, as the embodiment of the distinctive characteristics of a type and period, and as a property that represents a significant and distinguishable entity whose components may lack individual distinction. As associated with the property's significance under Criterion C (Design/Construction), the recommended period of significance for Parkmerced begins in 1941, the initial date of construction, and ends in 1951, the end date of construction.

The HRE includes contextual and biographical information about Thomas Church and his body of work (pp. 41-44). To evaluate a historic resource, a historic context is necessary to identify the significance of a resource. The HRE and the EIR provide sufficient information to identify the historic resource on the Project Site, and to determine Parkmerced as a "work of a master" under California Register Criterion 3 (Architecture)/National Register Criterion C (Design/Construction) for its association with Thomas Church.

The comment's suggestion that the Draft EIR finds that the Parkmerced garden designs are an insignificant example of Thomas Church's body of work is incorrect. The EIR and HRE identify the Parkmerced gardens as a character-defining feature of the historic district and cultural landscape (Section V.D.a, Historic Architectural Resources, of the EIR, pp. V.D.16-V.D.18).

8. PAST HISTORICAL STUDIES OF PARKMERCED

The following comment discusses the past historical studies of Parkmerced and is responded to either entirely or in part in this Master Response: 54.A.41.

The comment suggests that the historic resources analysis in the Draft EIR notes historical studies of the San Francisco State University (SFSU) Campus Master Plan, and then states that these studies are an inadequate review of historical district boundaries and eligibility.

Section V.D.a, Historic Architectural Resources, of the EIR does not cite to any historical studies performed by SFSU. The HRE examined a number of past historical studies, not only studies performed for SFSU, to understand if the property was determined eligible or listed in any prior historic resource evaluations. This examination revealed that the property had not been determined eligible or designated in any local, state or national historical register. The HRE's conclusions regarding the Project Site were based upon independent fieldwork and an evaluation of the Project Site for its eligibility for the California Register of Historical Resources.

MASTER RESPONSE A.2: TRANSPORTATION AND CIRCULATION

1. INTRODUCTION

Due to the level of interest by the public and the number of comment letters received, many comments address similar issues related to transportation that are more easily addressed in a master response rather than individual responses to each letter. The following comments are responded to in whole or in part by this Transportation Master Response: TR.5.3, TR.5.4, TR.11.2, TR.15.2, TR.25.1, TR.25.3, TR.25.4, TR.31.1, TR.31.2, TR.35.1, 1.3, 1.6, 1.8, 1.10, 1.11, 1.13, 4.2, 4.3, 4.4, 4.8, 9.1, 10.5, 11.1, 12.1, 12.3, 12.5, 12.6, 12.12, 12.17, 12.18, 12.19, 12.20, 14.1, 14.6, 14.7, 14.9, 14.10, 14.12, 17.19, 17.20, 17.21, 17.23, 19.2, 20.1, 28.4, 35.2, 36.1, 37.1, 40.2, 42.1, 45.15, 45.16, 45.37, 47.2, 52.4, 52.14, 54.A.11, 54.A.12, 54.A.13, 54.A.32, 54.A.33, 54.B.7, 54.B.14, 54.B.19, 54.B.21, 54.B.24, 54.B.34, 54.B.35, 54.B.36, 54.C.20, 54.C.29, 54.C.31, 54.C.34, 54.L.10.

2. TRAVEL DEMAND FORECASTING

A number of comments raise questions about the methodology and assumptions used to develop forecasts for increased travel demand associated with the Proposed Project. The travel demand forecasting for a project of this scale is a very important process. It is essential to understand the travel demand associated with the Proposed Project as well as the background growth anticipated in future years due to other local and regional development. Pages V.E.40-V.E.50 of Section V.E, Transportation and Circulation, in the Draft EIR explain the forecasting procedures in detail, and additional detail is provided in the *Transportation Impact Analysis Report* on file and available for public review at the Planning Department. Further discussion related to public comments on the methodology is provided below.

2.1 Project Trip Distribution

One of the key components of travel demand forecasting is an accurate understanding of the geographic distribution of project-generated trips. In 2007, a travel survey of existing Parkmerced residents was conducted in which residents reported the zip code of their place of employment.¹ While this information was an important input to the forecast for geographic distribution for the Proposed Project, the ultimate distribution forecasts were not selected solely from the results of the survey because it is anticipated that there would be an overall demographic change in the Parkmerced site as a result of the Proposed Project.

¹ Fehr & Peers, *Transportation Impact Analysis Report Technical Appendix – Appendix J: Initial Assumptions Memorandum, and Sub-Appendix F: Parkmerced Resident Travel Survey.*

For example, the current site has a relatively high number of students and seniors, who tend to be more transit-dependent (see Section 2.2, Project Mode Share, of this Master Response) and who are less likely to exhibit typical commute patterns to major job centers. The Proposed Project is expected to increase the number of residents commuting to major employment centers, such as Downtown San Francisco, the Peninsula, or Silicon Valley.

The survey results from the existing Parkmerced residents did not include information on non-work trips. Therefore, the survey results were not used to forecast distribution of non-work trips. Instead, the Superdistrict level non-work distribution from the *SF Guidelines* was split into super-neighborhoods by considering the proximity of the super-neighborhood and the relative percentage of jobs in each of the super-neighborhoods². Northern San Mateo County has numerous shopping centers within a short distance of Parkmerced; future residents are expected to shop in those nearby locations because the Proposed Project is much closer to those major shopping areas than to the average Superdistrict 4 development (the Project Site is located in Superdistrict 4). Adjustments were made from the *SF Guidelines* distribution to reflect the higher proportion of non-work trips to northern San Mateo County and the Stonestown Galleria compared to the distribution in the *SF Guidelines*. This presents a more accurate assessment of the geographic distribution of trips to and from the Proposed Project because it accounts for the unique local characteristics of the Project Site and its adjacent uses compared to the more generalized information in the *SF Guidelines*.

2.2 Project Mode Share

San Francisco is a unique environment that provides many different viable modes of travel. This fact highlights the importance of identifying a sensitive and accurate mode choice model rather than basing forecasts on historical rates, particularly for projects that propose relatively substantial changes to the transportation system. The *SF Guidelines* provide a general static transit mode share percentage by trip type and Superdistrict; however, given the expected demographic shifts and the changes to the transit system included in the Proposed Project, the static transit forecasts in the *SF Guidelines* were deemed inappropriate in this case. The forecasts for transit mode share were based on a regression model applied to a more refined zone structure specific to neighborhoods and transit routes. The forecasts are appropriately sensitive to the Proposed Project's changes to transit service near the Project Site. This analysis breaks down the

² The Metropolitan Transportation Commission (MTC) has divided the nine-county Bay Area into 34 so-called "superdistricts" for purposes of analyzing travel behavior on a large scale. The City of San Francisco comprises four superdistricts. Super-neighborhoods are a similar grouping of neighborhoods within San Francisco on a finer grain than the superdistrict level. For purposes of this analysis, the City of San Francisco was divided into 15 super-neighborhoods, as described in the *Transportation Impact Analysis Report Technical Appendix – Appendix J*. This is a finer scale than typically used for transportation impact analyses conducted in San Francisco, but appropriate given the scale of the Proposed Project and the degree to which increased travel may affect specific transit routes.

standard four San Francisco Superdistricts into smaller super-neighborhoods so that the predicted transit mode share better reflects actual transit connectivity between the Proposed Project and a specific neighborhood.

A statistical model was constructed to determine the correlation between a number of variables that may influence mode choice between the Proposed Project and specific neighborhoods.³ The model was designed to predict transit mode shares. Five super-neighborhoods in San Francisco and their corresponding travel characteristics were used to construct the model. The neighborhoods used – Downtown, Richmond, Outer Mission, Hill Districts, and Sunset – were chosen because they represent a mix of downtown and cross town travel patterns and provide a mix of outlying neighborhoods that may share travel patterns similar to the Proposed Project. For each origin-destination (OD) pair, base year auto travel time data from the San Francisco County Transportation Authority (SFCTA) travel demand forecasting model, transit travel time data from Muni, and known travel costs between zones (e.g., transit fares, parking costs) were compiled. Using this data, the following variables were created:

- *Drive Time*: Drive time between the Proposed Project and each trip origin/destination was taken from the SFCTA model, and represents the PM peak hour average travel time between a central point within each zone.
- *Paid Parking Percentage (PctPaidPark)*: The cost to park in each zone was calculated by taking an hourly parking rate for that zone and multiplying it by the proportion of trips to that zone that pay for parking. The SFCTA model land use file provides an hourly parking rate for work and for non-work trips. The average hourly parking rate was then multiplied by 8 hours for a work trip and 2 hours for a non-work trip.
- *Transit Average Wait Time (TransitAvgWait)*: This is the sum of half of the headway of each transit line taken between the Proposed Project and a particular origin/destination. For some districts, a greater than 5-minute walk was required to access a central location representative of most of the expected transit trips to that district. In these cases, walking time was multiplied by 0.5 and the result was added to the Transit Average Wait Time. This assumes walking time penalizes transit mode share less than actual waiting time.
- *Transit Transfers (TransitXfers)*: This is the number of transfers needed to take public transportation between the Proposed Project and a given origin/ destination.
- *Transit Travel Time (TransitTime)*: The average travel time taken by public transit between the Proposed Project and a given origin/destination. This data was taken from 2006 Muni transit survey data for the Transit Effectiveness Project (TEP).

This information was compiled into a series of matrices by origin-destination pair, entered into a statistical software program, and used to develop an equation from the survey data that predicts transit mode share based on these variables. Appendix J of the *Transportation Impact Analysis Report Technical Appendix* includes the model input factors and Appendix I contains the model's

³ Fehr & Peers, *Transportation Impact Analysis Report Technical Appendix* – Appendix J: Initial Assumptions Memorandum, pp. 25-36.

validation statistics. Ultimately, the model showed that for work trips, *DriveTime*, *PctPaidPark*, *TransitAveWait*, and *TransitXfers* were the best predictors of the transit mode share. For non-work trips, *DriveTime*, *PctPaidPark*, *TransitXfers*, and *TransitTime* were the best predictors of the transit mode share.

2.3 Project Parking Demand

A number of comments identify concerns regarding the projected parking demand related to the proposed parking supply. Some comments are concerned that parking supply would be inadequate, resulting in increased difficulty finding parking in the area surrounding the Proposed Project; other comments suggest that the proposed parking supply was too high and that a lower parking supply would encourage transit use. The Proposed Project's overall parking ratio of 1 space for each dwelling unit is consistent with the requirements set forth in the San Francisco Planning Code. To encourage transit use, residential units closer to the proposed M Ocean View stations would have a lower parking supply and units farther away would have a larger supply, which would decrease the attractiveness of driving compared to using transit for those residents closer to transit.

This section provides additional detail regarding the methodology by which parking demand was forecasted and provides discussion on the relationship between parking demand and supply and the EIR conclusions.

As discussed in Section 2.2, Project Mode Share, of this Master Response, the mode split and trip generation models developed for the Proposed Project and used in the EIR were calibrated and validated to similar neighborhoods in San Francisco which have similar parking characteristics. The forecasts of peak parking demand were then based on the forecasted vehicle trip generation, consistent with the methodology outlined in the *SF Guidelines*. Using this methodology, the analysis projected a peak parking demand of 13,490 spaces associated with the Proposed Project, which would result in a shortfall of 2,359 spaces compared to the amount of parking proposed, including both on- and off-street parking.

In summary, the analysis in the EIR projected a shortfall of parking in the area; however, as described on pp. V.E.103-V.E.104, since the City of San Francisco does not consider parking a part of the physical environment, no impacts associated with parking shortfalls were identified. Further, as discussed in the EIR, the secondary effects of the projected parking shortfall, such as additional traffic due to people searching for available parking spaces, is likely to be offset by a potential mode shift to transit.

2.4 Cumulative Year Forecasting

Some comments request additional detail regarding the methodology and assumptions used to prepare long-term cumulative (year 2030) travel demand forecasts. Pursuant to Section 15130 of the *CEQA Guidelines*, all reasonably foreseeable projects within the geographic scope of the Project Site were assumed under cumulative conditions. This includes regional population and employment growth as forecasted by the Association of Bay Area Governments (ABAG) as well as specific development projects recently discussed near the Proposed Project. As identified on p. V.E.49 of the EIR, the following specific development projects were assumed under cumulative conditions:

- 77 Cambon Drive
- 800 Brotherhood Way
- Ardenwood
- Stonestown Shopping Center
- San Francisco State University (SFSU) Master Plan Buildout
- San Francisco Unified School District's School of the Arts site development
- 1150 Ocean Avenue

Although not all of these sites have specific development proposals active at the present time, they are reasonably likely to be developed within the cumulative study timeframe of about 20 years.

A similar process is typically considered for transportation infrastructure projects, in which projects anticipated to be in place by year 2030 are generally included in the analysis of year 2030 cumulative conditions. However, City staff indicated that there are no major roadway or transit projects anticipated in the Project study area that would impact circulation, other than projects proposed as part of the TEP, which is discussed in the EIR and in Section 2.5, Future Muni Service, of this Master Response. Roadway improvement projects that have a temporary impact on the circulation system, such as the temporary closure of the Great Highway for maintenance, are analyzed under their individual project approval process; they are not expected to have long-term effects that would influence the cumulative analysis.

2.5 Future Muni Service

The transportation analysis assumed implementation of SFMTA's TEP recommendations under cumulative conditions. Launched in May 2006, the TEP gathered an unprecedented level of ridership data, studied best practices from other transit systems, and conducted extensive public outreach to community stakeholders, policy makers, and SFMTA employees.

III. Comments and Responses
A. Master Responses
A.2: Transportation and Circulation

Informed by these efforts, the TEP developed a set of preliminary proposals designed to improve reliability, reduce travel delay, and update routes to better meet current and projected travel patterns throughout the City. In spring 2008, SFMTA presented the draft recommendations to a broad cross-section of stakeholders through a series of 11 citywide workshops and over 100 briefings to community groups, SFMTA employees, elected officials, fellow City agencies, and other interested stakeholders. After refining the proposals to incorporate this valuable feedback, the SFMTA Board of Directors endorsed the TEP recommendations in October 2008 in order to develop specific proposed projects based on the recommendations and seek any necessary environmental review. The final plan considered the many challenges that SFMTA faces, which include the following:

- Fuel, employee wages and benefits, and service start-up costs continue to increase.
- Revenues have remained either flat or are decreasing.
- Budget deficits are projected for the next 20 years.

The TEP improvements are considered reasonably foreseeable, more so than maintaining the existing services; thus, they were included in the cumulative CEQA analysis for the Proposed Project. Although SFMTA implemented an overall 10 percent service cut in May 2010 to address budget shortfalls, these cuts are anticipated to be temporary, as the SFMTA Board has already voted to restore over half of the cut service and the San Francisco Board of Supervisors is currently considering measures to restore the remaining 40 percent. Therefore, incorporating those cuts or any additional reduced transit service scenarios would be speculative as they have either been reversed or are proposed for reversal and no new service reductions have been proposed by SFMTA.

The EIR identifies Impact TR-12, p. V.E.80, which states that increased ridership on the M Ocean View due to the Proposed Project would cause capacity impacts traveling from Downtown to the Project Site in the PM peak hour. Based on discussions with SFMTA, the Draft EIR identified that the main underground facilities along Market Street are at capacity in terms of the number of light rail vehicles that can be accommodated during peak periods. Therefore, the Draft EIR identified that capacity expansion of the M Ocean View by adding additional vehicles or increasing frequencies is infeasible and determined that the impact would be significant and unavoidable. Evaluation conducted by SFMTA subsequent to publication of the Draft EIR has suggested that additional vehicles on the M Ocean View may be possible, either through reductions to service on other lines to accommodate additional service on the M Ocean View, or through technology enhancements. A revised service plan that increased frequencies on the M Ocean View from the proposed 10-minute headways to 7.5-minute headways (still with every other train continuing from Parkmerced to Balboa Park BART) would reduce the significant capacity-related impacts on the M Ocean View identified in Impact TR-12. These two possibilities for increasing capacity on the M Ocean View are discussed below.

III. Comments and Responses
A. Master Responses
A.2: Transportation and Circulation

If capacity could be made available by adjusting other rail services in the City to accommodate additional M Ocean View trains (with no net increase in the number of vehicles traveling through the underground tunnel), it is likely that it would be a very extensive implementation process requiring substantial amounts of public outreach. This would be outside the reasonable burden of the Project Sponsor, and is not independently proposed by the SFMTA.

Furthermore, the current system is based on extensive outreach conducted by SFMTA to all communities that it serves. The current levels of transit service provided to each neighborhood served are a function of supply, demand, demographic needs, and other factors. While it is possible that in the future SFMTA may revise service plans, SFMTA cannot commit to doing so based solely on this analysis.

Finally, technology enhancements that could be used to increase capacity through the underground subway portion of the M Ocean View route may allow for increased service on the route without affecting service on other light rail routes that share the tunnel. However, evaluation of the feasibility of such technology is inconclusive and cannot be guaranteed by SFMTA.

Because both of these options are not considered feasible at this time, the impacts are still considered significant and unavoidable. Beginning at the second paragraph of Impact TR-12 of Section V.E, Transportation and Circulation, the EIR has been revised to as follows:

M-TR-12: Contribute fair share toward purchase of additional transit vehicles (and maintenance and operating costs associated with those additional vehicles) to increase capacity on the M Ocean View. Providing additional capacity by adding an additional car to the M Ocean View line during the PM peak hour would allow the M Ocean View line to operate under 85 percent capacity utilization. There are two ways in which this might be accomplished. One way would be to add a third car to some of the M Ocean View trains during the PM peak hour; which currently operate as two-car trains during peak hours. While a three-car train can be served in the subway, the surface level stations are not currently configured to serve a three-car train. The cost associated with upgrading the stations along the M Ocean View line to serve three-car trains would be substantial, and in some locations, space may not be physically available. Therefore, this approach is not considered feasible.

A second way to increase capacity would be to add another train, decreasing the headways increase the frequency of service on of the M Ocean View, by allocating additional trains to the M Ocean View. The Proposed Project would include service frequencies north of Parkmerced at 10 minute headways during the AM and PM peak periods, consistent with what is proposed under the TEP. Under conditions with the Proposed Project, every other train would continue east through the Ingleside neighborhood to Balboa Park BART. A revised service plan, in which frequencies on the M Ocean View would increase from 10 minute headways to 7.5 minute headways north of Parkmerced, would increase capacity such that the northeast screenline would operate within SFMTA's capacity utilization threshold in each peak hour. Under this plan, similar

III. Comments and Responses
A. Master Responses
A.2: Transportation and Circulation

to the proposed service plan, every other train would continue east through the Ingleside neighborhood.

However, based on initial conversations with SFMTA staff, the subway along Market Street currently operates at capacity during peak hours and it may not be feasible to add additional trains cannot be added without reducing service elsewhere, and additional study is required to determine how such changes could be implemented in the context of the overall Muni Metro system. Further, although this impact is a project-specific impact, it is unlikely that a completely revised service plan for the Muni Metro would be implemented in the near term and solely in the context of the Proposed Project's impacts. Rather, if feasible, such a change would be implemented in the context of cumulative anticipated development. Therefore, the additional capacity on the M Ocean View likely to be included in a revised operating plan would exceed the amount needed to mitigate solely the impacts of the Proposed Project.

This measure calls for the Proposed Project to fund a fair-share contribution toward the purchase of additional transit vehicles (and maintenance and operating costs associated with those additional vehicles) that is directly proportional to the Proposed Project's impact to transit capacity.

Further, even if it were determined to be physically possible to increase frequencies on the M Ocean View, neither SFMTA nor the San Francisco Board of Supervisors, who control SFMTA's operating budget, can commit to funding such service in perpetuity because the current decision-makers cannot tie the hands of future decision-makers in this way. Thus, while the SFMTA has reviewed the feasibility of a revised service plan, the feasibility remains uncertain and implementation of the service plan cannot be guaranteed. Transit capacity impacts under the Project conditions would remain significant and unavoidable.

A second way to increase capacity would be to add a third car to some of the M Ocean View trains during the PM peak hour; they currently operate as two-car trains during peak hours. While a three-car train can be served in the subway, the surface level stations are not currently configured to serve a three-car train. The cost associated with upgrading the stations along the M Ocean View line to serve three-car trains would be substantial, and in some locations, space may not be physically available.

Adding an additional train run during the PM peak hour is not feasible due to capacity constraints in the Market Street Subway. The cost of retrofitting all existing surface platforms to serve three-car trains on the M Ocean View line far exceeds the reasonable capability and responsibility of the Project Sponsor, and would represent a series of improvements for which no fair share funding mechanism has been established. Therefore, the Proposed Project's impact to capacity utilization on the Study Area northeast screenline would be significant and unavoidable.

3. TRANSPORTATION ANALYSIS

The transportation analysis presented in the EIR identifies the impacts of the Proposed Project, its variants and sub-variants, and alternatives to the Proposed Project on the transportation system. A number of comments raise issues about the variants and alternatives to the Proposed Project discussed in the EIR. This section of the Master Response discusses the selection of variants and alternatives.

3.1 Scenarios

The various scenarios presented in the EIR are the product of much collaboration among the Project Sponsor, SFMTA, the Planning Department, and other City agencies. Different permutations of the Proposed Project and transportation improvements were considered, many of which were studied in the *19th Avenue Corridor Study*. The most feasible combinations of improvements relevant to the Proposed Project were then analyzed in the EIR.

Additional Travel Lane on 19th Avenue

As noted in the EIR, the Proposed Project proposes to construct a fourth southbound travel lane on 19th Avenue between Holloway Avenue and Junipero Serra Boulevard. This travel lane is not intended to expand vehicular capacity beyond existing conditions; rather, it would provide additional storage and throughput to counteract the effects of the M Ocean View crossing 19th Avenue into the Project Site at Holloway Avenue and Junipero Serra Boulevard.⁴ The remaining island created by removing the tracks from 19th Avenue would create a mid-crossing pedestrian refuge on 19th Avenue. The Proposed Project also includes landscaping treatments along 19th Avenue, which would improve the pedestrian environment along the corridor. If the fourth lane were not implemented, either new significant impacts to auto traffic and bus service would occur along the 19th Avenue corridor or significant impacts identified in the EIR would be exacerbated.

Improvements from Relocating M Ocean View

As noted throughout the EIR, the Proposed Project proposes to reroute the M Ocean View from 19th Avenue/Holloway Avenue to Junipero Serra Boulevard/19th Avenue. While this proposal has benefits associated with bringing transit service as close as possible to users and/or destinations, and encouraging a more transit-oriented “feel” to the Proposed Project, the proposal also carries a number of pedestrian improvements. First, the proposal would provide a transit station within the Proposed Project site, with a large waiting plaza—a substantial improvement over the existing

⁴ Although the intent of the fourth southbound travel lane was not to increase vehicular capacity beyond existing levels, the analysis indicates that the additional travel lane provides more auto capacity than the amount taken up by having the M Ocean View cross 19th Avenue.

platform in the center of 19th Avenue, which experiences overcrowding during peak periods. Second, the proposal would provide pedestrian safety improvements for San Francisco State University (SFSU) students who take the M Ocean View. Students would no longer have to cross a portion of 19th Avenue to reach the train platform; instead, they would cross the much narrower and lower-volume Holloway Avenue to reach the new station. Similarly, residents of Parkmerced would be able to access frequent rail transit service without having to cross any major streets, such as 19th Avenue. This is consistent with the City's Transit First strategy.

Relationship to 19th Avenue Corridor Study

Based on a resolution adopted by the San Francisco Board of Supervisors, the Planning Department has prepared the *19th Avenue Corridor Study*. The purpose of the 19th Avenue Corridor Study is to “identify the demand for, and any deficiencies in, traffic and transportation systems, public services and utilities, recreational resources, and schools, as a result of reasonably foreseeable development along and in the vicinity of the 19th Avenue Corridor.” The *19th Avenue Corridor Study* does not take the place of impact analyses under CEQA for individual projects, including the Proposed Project. Instead, the *19th Avenue Corridor Study* is intended to provide separate and comprehensive analysis of cumulative impacts to be used in conjunction with individual projects' environmental review.⁵

Because of the number of variables associated with specific development projects and other planned improvements to the area, the *19th Avenue Corridor Study* evaluated four analysis tiers:

- **Tier 1** – Future year 2030 conditions with no major development projects or transportation improvements within the study area.
- **Tier 2** – Tier 1 conditions plus travel demand associated with eight potential development projects in the study area (including the Proposed Project), without their associated transportation improvements.
- **Tier 3** – Tier 2 conditions plus implementation of transportation improvements currently proposed by City, regional, and State agencies.
- **Tier 4** – Tier 3 conditions plus implementation of transportation improvements associated with the proposed development projects, which include roadway, intersection, bicycle, pedestrian, and transit enhancements at locations around the Parkmerced neighborhood.⁶

The *19th Avenue Corridor Study* also calls for a fifth tier to be developed at a later time. Tier 5 will assess large-scale and long-term projects in the area to address corridor-wide transportation issues. The Tier 5 improvements ultimately proposed in the *19th Avenue Corridor Study* will be

⁵ San Francisco Planning Department, *19th Avenue Corridor Study*, February 2010, p. I.1.

⁶ Variations of Tier 4 were evaluated corresponding to the different alignments to the M Ocean View and the proposed HOT lane as described for the Proposed Project variants and alternatives to the Proposed Project evaluated in the EIR.

representative of the ultimate, long-term goals of the City. Tier 5 was not analyzed in the EIR because when initially defined, it will likely represent an “optimistic” scenario, rather than a reasonably foreseeable scenario. As a result, if the improvements ultimately identified as part of Tier 5 were assumed in the analysis, it may understate the impacts of the Proposed Project.

Future large-scale projects proposed as part of Tier 5 in the *19th Avenue Corridor Study* could include major improvements such as grade-separation of the M Ocean View crossings at 19th Avenue, extension of the M Ocean View to the Daly City BART Station, or relocation the M Ocean View to the west side of 19th Avenue for its entire route. Some of these improvements could negate the need for the fourth southbound lane included in the Proposed Project. However, these potential transit improvement projects are currently unspecified and unfunded, and their inclusion in the EIR would be speculative. Prior to implementation of major improvements that may be included in Tier 5, specific elements or groups of elements would undergo separate environmental review. Should analysis of Tier 5 improvements show that it is appropriate to remove the fourth lane included in the Proposed Project, the impacts of doing so would be evaluated as part of the separate environmental review.

19th Avenue HOT Lane (Project Variant)

Instead of constructing a new fourth lane on southbound 19th Avenue for mixed-flow traffic, a variant was analyzed under the three rail configuration alternatives on pp.VII.54-VII.56. This variant consisted of implementing the new lane as a High-Occupancy/Toll (HOT) Lane. A HOT lane is similar to a high-occupancy vehicle (HOV or “diamond”) lane because buses and carpools can use the usually less-congested facility, but it also acts as a road-pricing system that gives single-occupant vehicles access for a fee. Tolls are typically dynamic to ensure the facility remains relatively uncongested (congestion pricing) and are collected through a variety of methods. In this case, an electronic toll collection method, such as Fastrak, would likely be the most feasible.

A HOT lane was considered for analysis instead of a HOV lane because of its ability to provide similar benefit to transit and carpools while providing options for drivers who are willing to pay for an improved travel time and potentially generating revenues to support other transportation programs in the area. A HOT lane was considered in the northbound direction, but was ultimately rejected as infeasible due to the geometry of the 19th Avenue/Junipero Serra Boulevard intersection.

The EIR, on p. V.E.95-V.E.96, identifies that there is limited improvement in transit travel times due to the HOT lane, compared to a mixed-flow lane. The reduced traffic flow in the outside lane would provide better travel speeds and reduced re-entry delay for Muni bus lines 28 and 28L 19th Avenue, but it is a relatively short segment between Holloway Avenue and Junipero Serra

Boulevard. Greater benefit to transit could be achieved by extending the HOT lane for a greater length of 19th Avenue, but this would require extensive study due to the limited right-of-way available along 19th Avenue and congested traffic conditions, and is therefore not proposed. However, the proposed segment does not preclude an extended HOT lane network.

If the HOT lane proposed as part of the Project Variant is ultimately approved, further study by SFMTA and Caltrans regarding design details, operations and maintenance, and enforcement would be necessary. However, these design elements are not required as part of the EIR.

3.2 Scope of Study

The EIR analyzes a study area that extends approximately one mile to the north and south of the Project Site. The study locations were chosen carefully by the EIR analysts and City staff based on those locations most likely to experience impacts due to the Proposed Project. The key vehicular access routes to and from the Proposed Project were closely studied, including: 19th Avenue, Junipero Serra Boulevard, Lake Merced Boulevard, John Daly Boulevard, and Brotherhood Way.

Additionally, transit, bicycle, and pedestrian facilities were considered in the impact analysis. The M Ocean View light rail line, in particular, would be impacted by the additional ridership between the Proposed Project and Downtown. This was identified as a significant impact in the EIR. A parking analysis was also provided for informational purposes, but as discussed above in Section 2.3, Project Parking Demand, parking is not considered part of the permanent physical environment and therefore not an impact under CEQA.

3.3 Mitigation Measures

A number of comments on the Draft EIR relate to the scope and adequacy of mitigation measures proposed to reduce or eliminate significant project-related impacts. Appropriate mitigation measures were determined in a way that best fits the identified significant impact while being reasonably proportional to the Proposed Project's impact. Various solutions were considered during the process. However, a number of situations were identified where mitigation measures were deemed infeasible. Generally, the proposed mitigation measures were determined to be infeasible if they fell into at least one of three categories: (1) conflicts with City policies and/or would create secondary impacts; (2) required construction of infrastructure well beyond the scope of the Proposed Project; or (3) lacked institutional consensus regarding the feasibility of improvements. Each of those categories is discussed below.

A number of mitigation measures, particularly for auto traffic-related impacts, would create secondary impacts or would be inconsistent with City policies. For example, measures that would widen roadways to provide additional travel lanes at intersections to reduce significant

traffic-related impacts would increase pedestrian crossing times and distance or result in demolition of buildings or result in deficient sidewalk space. In these cases, the mitigation measures were generally deemed infeasible by SFMTA due to inconsistency with the City's Transit First Policy and the impacts were identified as significant and unavoidable.⁷

In other cases, the magnitude of mitigation measures suggested in comments on the Draft EIR far exceeded the reasonable responsibility of the Project Sponsor. For example, mitigation measures on facilities that would require significant infrastructure construction, such as the widening of State Route 1 between Brotherhood Way and John Daly Boulevard, were not considered due to the extensive cost and impact to adjacent structures and the environment. Such mitigation measures need not be considered because CEQA does not require discussion of mitigation measures that are infeasible, including any mitigation measure that itself may constitute a project as complex, ambitious, and costly as the project evaluated by the EIR. Mitigation measures should be appropriately proportional to the impacts of a proposed project.

Finally, in many cases smaller, location-specific measures have been proposed in the EIR, such as lane modifications, installation of new signals, and implementation of new parking restrictions. Some of these improvements present design challenges, and it is currently uncertain whether those challenges can be overcome in a manner acceptable to SFMTA. Other improvements present relatively fewer design challenges, but they still must be approved by SFMTA and as a result, their feasibility is also uncertain, in part because SFMTA, as a City department, cannot commit to approving any aspect of the Proposed Project, including mitigation measures, before this environmental review is complete and it can consider a certified Final EIR. In these cases, additional study will be performed to determine feasibility, and if the improvements are determined to be feasible, the Project Sponsor will be responsible for funding them.

Broader, long-range solutions not identified as mitigation measures in the EIR could still be considered by the City with further study, potentially as part of Tier 5 of the *19th Avenue Corridor Study*.

3.4 Number of Significant and Unavoidable Impacts

The Draft EIR analyzed the impacts associated with the Proposed Project and the Proposed Project's contribution to cumulative impacts, and identified a number of significant and unavoidable impacts. A number of comments suggest that traffic conditions in the study area are already congested, and that the traffic impacts associated with the Proposed Project, either

⁷ Note that there are some mitigation measures and even components of the Proposed Project that do involve adding traffic lanes. However, in these cases, the additional width can be provided without demolishing buildings or resulting in substandard sidewalks.

individually or in combination with other reasonably foreseeable projects in the study area, would exacerbate the problem.

The EIR identifies a number of significant impacts to automobile circulation due to the Proposed Project and also due to cumulative growth in the area. For locations where cumulative growth is anticipated to cause vehicular circulation to deteriorate substantially, the Proposed Project's contribution was evaluated to determine whether it would be cumulatively considerable, as described in the Draft EIR in Section V.E, Transportation and Circulation, pp. V.E.106-V.E.116.

Comments regarding the increase in congestion in the study area also express opposition to the Proposed Project, but generally do not raise any specific comment on the adequacy or accuracy of the analysis presented in the Draft EIR. The purpose of the EIR is to inform the public and decision-makers regarding the potential significant environmental impacts associated with the Proposed Project. With this information in hand, it will be up to decision-makers to determine whether the benefits of the Proposed Project warrant its approval.

4. FUNDING FOR PROJECT INFRASTRUCTURE IMPROVEMENTS

The purpose of the EIR is to disclose the environmental impacts of the Proposed Project and to analyze alternatives and mitigation measures that could reduce or eliminate the Proposed Project's significant environmental impacts. The EIR is not required to determine sources of funding for proposed mitigation measures, and to limit mitigation measures to those for which funding sources have been identified could constrain the identification and analysis of potentially feasible measures in the document.

The Project Sponsor is currently collaborating with SFMTA and other City agencies to determine their contribution responsibility, not only to capital improvements, but also to operational costs for Muni, if necessary, and the privately operated shuttles proposed as part of the Proposed Project. A detailed analysis of the cost of Muni operations will be incorporated into the Project's Fiscal Analysis Report.

MASTER RESPONSE A.3: SEISMIC HAZARDS

1. INTRODUCTION

Many comments received on the Parkmerced Draft EIR raise similar issues related to seismic hazards. The following comments discuss seismic hazards and are responded to in whole or in part by this Seismic Hazards Master Response: TR.2.1, TR.18.4, 6.6, 27.1, 33.3, 50.2, 54.A.20, 54.B.8, 54.B.10, 54.B.18, 54.B.41, 54.B.43, 54.B.44. The main points raised in these comments are summarized below:

- The existing and proposed residential towers pose a significant seismic hazard due to the Project Site's proximity to the San Andreas fault and the site's soil conditions.
- The age and accompanying deterioration of existing structures could also contribute to these hazardous conditions during a seismic event.

CEQA requires that an EIR analyze only proposed changes to the environment caused by a development project; the existing towers and other buildings on the Project Site that would be retained are not a part of, and would not be affected by, the Proposed Project. Therefore, the seismic conditions of existing buildings to remain on the Parkmerced Project Site would not be affected by the Proposed Project, and the buildings do not need to be evaluated in the EIR. Seismic hazards related to these buildings would remain as at present and are part of the baseline conditions. However, for information purposes, this Master Response discusses both the Proposed Project and the existing towers and other buildings to be retained.

2. PROPOSED PROJECT DEVELOPMENT

The EIR discusses seismic hazards on the Project Site in Section V.N, Geology and Soils, pp. V.N.1-V.N.15. As discussed on p. V.N.4, the Project Site, like all of the San Francisco Bay Area, is situated in a seismically active region. The closest active fault to the Proposed Project is the San Andreas fault, located approximately 1.25 miles to the west. The Hayward-Rodgers Creek fault system in the East Bay is further away, but more likely to have an earthquake of Moment Magnitude (M) 6.7 or greater than the San Andreas fault. There are no active faults and or potentially active faults existing on or immediately adjacent to the Project Site. The Project Site is not in a designated Alquist-Priolo zone (a zone immediately adjacent to an active earthquake fault, in which development is regulated pursuant to the State's Alquist-Priolo Act).¹

¹ The Alquist-Priolo Earthquake Fault Zoning Act prohibits the construction of buildings used for human occupancy on the surface trace of active faults. When a fault trace is found by a geologic investigation, a structure for human occupancy cannot be placed over the trace of the fault and must be set back at least 50 feet from the fault.

III. Comments and Responses

A. Master Responses

A.3: Seismic Hazards

During a major earthquake on a segment of one of the nearby faults, strong to very strong ground shaking is expected to occur at the Project Site and at all other properties in the City. Like other buildings in the City, the existing and new buildings on the Project Site could be affected by strong ground shaking.

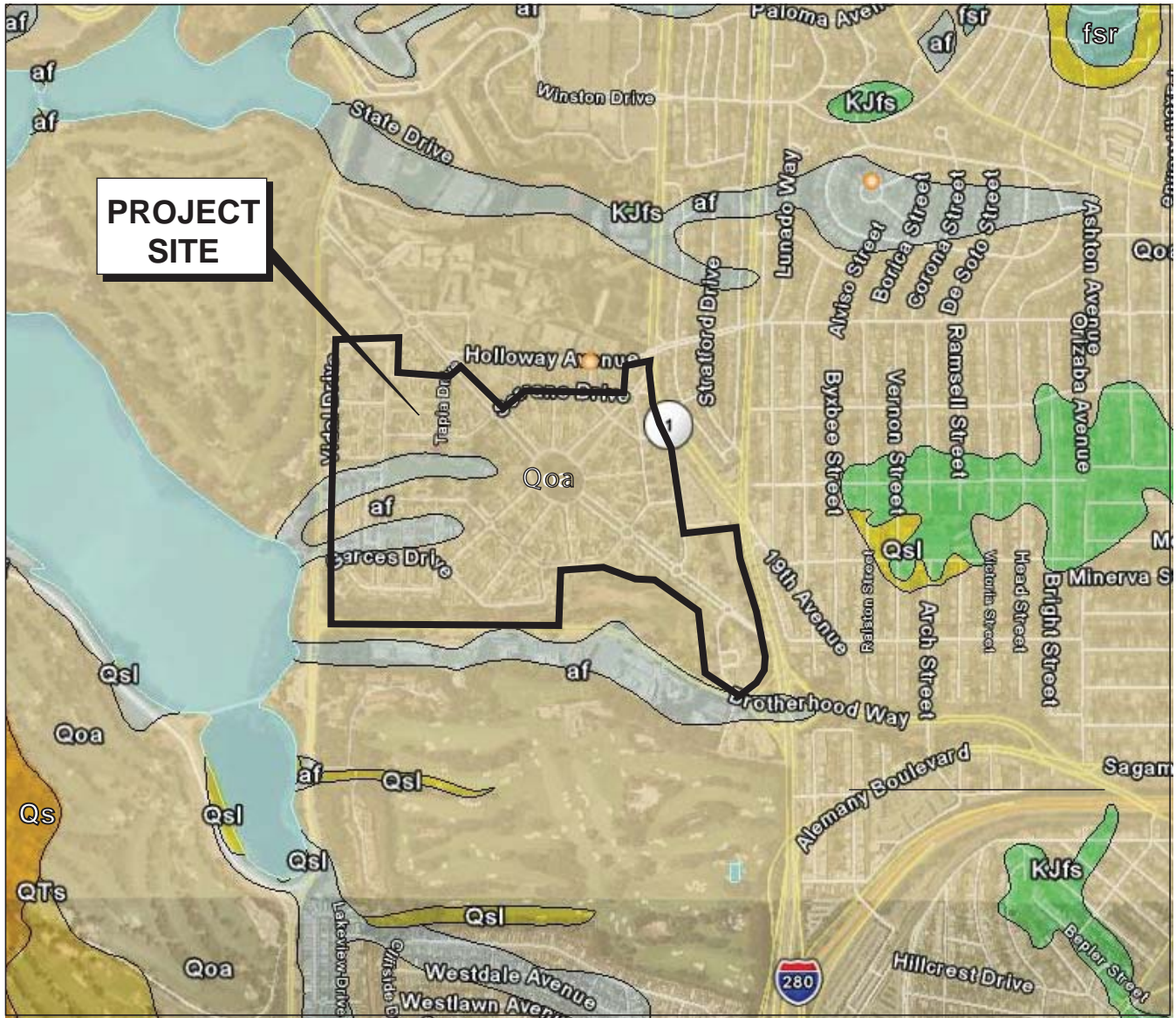
The EIR assesses the potential seismic hazards for the Proposed Project and concludes that there would be no significant impacts related to seismic hazards (see Impact GE-2, pp. V.N.12-V.N.13). New structures would be designed and constructed in accordance with the most up-to-date codes. As noted on p.V.N.12, during its review of the building permit applications for new buildings on the Project Site, the City's Department of Building Inspection (DBI) would use site-specific geotechnical reports prepared by a California Certified Engineering Geologist or a California Registered Geotechnical Engineer during final design of each new building or building complex. DBI would ensure that all new buildings would comply with the San Francisco Building Code requirements for structural safety in effect at the time that each permit is issued.

As noted on p. V.N.1, a geotechnical report was prepared for the Proposed Project by a California-licensed geotechnical engineer in order to evaluate site conditions and potential hazards, and to develop preliminary recommendations for shoring and construction.² The report determined that the likelihood of specific seismic-induced hazards such as ground rupture or tsunami or seiche was very low or nil.

The report also assessed the potential for seismically induced ground failure due to the strong shaking that would be experienced on the site due to a major earthquake on the nearby faults. Most of the site is underlain by sand, except in limited areas where fill is present. The geotechnical report concludes that subsurface information indicates liquefaction and/or lateral spreading should not be an issue for the majority of the planned improvements.

The report did find, however, that there are areas of deep fill on the Project Site subject to potential liquefaction and/or lateral spreading. These areas principally consist of locations described as two former lobes of Lake Merced extending to the site. These areas are shown on Figure V.N.1: Local Geology Map, p. V.N.2 of the EIR, as shaded grey areas labeled as "af" (Artificial Fill). (For ease of reading, Figure V.N.1: Local Geology Map is also included in this Comments and Responses document on p. III.A.33.) The geotechnical report states that where this hazard exists, it can be accounted for by designing the foundation system for the anticipated

² Treadwell & Rollo, 2008. *Environmental Impact Report (EIR), Geologic, Geotechnical and Seismic Findings, Parkmerced Development, San Francisco, California*, May 9, 2008 p.10 (hereinafter referred to as "*Geologic, Geotechnical, and Seismic Findings*"). A copy of this report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File 2008.0021E.



SOURCE: Treadwell & Rollo, Turnstone Consulting

EXPLANATION

- af Artificial Fill
- Qs Beach and dune sand (Quaternary)
- Qsl Hillslope Deposits (Quaternary)
- Qoa Alluvium (early Pleistocene) (Qc-Colma Formation, Qd-Dune sand)
- QTs Sediments (early Pleistocene and (or) Pliocene)
- fsr Franciscan Complex melange (Eocene, Paleocene, and (or) Late Cretaceous)
- KJfs Franciscan Complex sedimentary rocks (Early Cretaceous and (or) Late Jurassic)

Geologic contact
dashed where approximate
and dotted where concealed

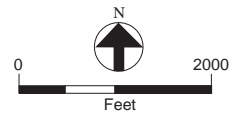


FIGURE V.N.1: LOCAL GEOLOGY MAP

differential movements, or by using deep foundations that transfer building loads to the soil below the susceptible layers. The report recommended that site specific investigations should be carried out for areas of potential for earthquake-induced ground movement.³ As noted in the EIR on p. V.N.7, the fill areas are included in California's Seismic Hazard Studies Zone. Consequently, there is a state-mandated requirement for a site-specific geotechnical investigation prior to any permit issuance, in addition to any local requirements. The geotechnical report notes that for proposed tall buildings in these areas, i.e., residential towers of 6 to 14 stories, it was determined that if the fill could not be sufficiently improved, then driven piles that gain support in the dense natural sand below the fill may be appropriate.⁴ As noted in the geotechnical report and cited in the EIR on p. V.N.13, smaller wood-frame buildings (1 to 5 stories) could be built on the deep fill areas with " mat foundations supported by several feet of compacted fill if they have small footprints and are designed to accommodate some differential settlement."

Thus, while the site (like all other sites within the City) is within a seismically active region and certain earthquake induced hazards can be expected, compliance with local and state codes and implementation of recommendations of site-specific soils reports as part of the permit review process would ensure that no significant adverse impacts due to seismic hazards would occur due to the Proposed Project.

3. SAFETY OF THE EXISTING RESIDENTIAL TOWERS

It is the purpose of CEQA to present decision-makers with information about the potential adverse environmental impacts of a proposed project. The decision-makers use this information to consider whether a proposed project should be approved, modified, or denied and what mitigations of alternatives to the project should be adopted. It is not the purview of CEQA to analyze and/or mitigate pre-existing conditions that are not affected by the project. The seismic conditions of existing buildings to remain on the Parkmerced Project Site would not be affected by the Proposed Project. Therefore, the buildings do not need to be evaluated in the EIR.

Nonetheless, information on existing conditions and how existing buildings on site performed during past seismic events and would be expected to perform in future events was gathered and

³ *Geologic, Geotechnical, and Seismic Findings*, p. 10.

⁴ *Geologic, Geotechnical, and Seismic Findings*, p. 13.

III. Comments and Responses

A. Master Responses

A.3: Seismic Hazards

analyzed by qualified geotechnical consultants and structural engineers.⁵ A summary of this analysis is provided here for informational purposes.

Studies on damage and repairs of the towers after the Loma Prieta Earthquake⁶ indicated non-structural damage in many towers. The towers most likely to be severely impacted were found to be those on the eastern end of the site,⁷ in the vicinity of the intersection of Brotherhood Way and Junipero Serra Boulevard. While there was some structural damage, the report concluded that, "... all are safe to occupy and present no immediate life-safety hazard. The structural system worked as was expected and the present condition is completely stable."⁸ The structural engineers who examined the towers on the eastern portion of the site noted that tower structures labeled 16, 17, and 18 in the report had sustained the most damage and recommended they be repaired through injection of epoxy into all structural cracks. It was also recommended that these structures, along with tower 15, be restored to their pre-earthquake strength. It was reported that structures 16, 17 and 18 had been subsequently repaired. It was concluded that the repair work was satisfactory and the buildings had been restored to their pre-earthquake structural capacity.⁹ The Project Sponsor has indicated that the recommended repair work for building 15 has also been completed.¹⁰

Telesis prepared a limited assessment of expected seismic performance of the towers in 1999, but indicated that a more detailed analysis should be performed. That was undertaken by Thornton-Tomasetti resulting in the report of September 29, 2005. This report concluded the towers were expected to perform adequately in a major earthquake from a life safety perspective, although significant structural and non-structural damage may occur, such as extensive cracking in the exterior and interior concrete walls, floor, and roof slabs. "Performing adequately from a life-safety perspective" indicates that the structures would not fail and occupants would be able to exit

⁵ Seismic Risk Assessment, Villas Parkmerced, 3711 Nineteenth Avenue, San Francisco, Ca. 94132, Prepared for: Stellar Management, 156 William Street, New York, NY 10038, Prepared by: Thornton-Tomasetti Group Inc., LZA Technology Division, 2415 Campus Drive, Suite 110, Irvine, Ca. 92612, September 29, 2005. A copy of this report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File 2008.0021E.

Seismic Performance and Risk Analysis for Villas at Parkmerced, San Francisco, Ca. Prepared by: Telesis Engineers, 480 Arlington Avenue, Berkeley, Ca. 94707, Job Number TE 949.2, 510 528-8262. A copy of this report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File 2008.0021E. [Note these reports were not part of the original case file as these concern existing conditions unrelated to project impacts and thus are outside the scope of the EIR.]

⁶ *Telesis 2006, Appendix A.*

⁷ *Telesis 2006*, Figure 1, p. 3, buildings 16, 17, 18.

⁸ *Telesis 2006*, p. 20.

⁹ *Telesis 2006*, p. 21.

¹⁰ Email communication with Seth Mallen, Executive Vice President, Stellar Management, August 25, 2010. This document is on file with the San Francisco Planning Department, 1650 Mission Street, Suite 400, and is available for public review as part of the project file, in Case No. 2008..0021E.

III. Comments and Responses

A. Master Responses

A.3: Seismic Hazards

the structures. The habitability of the structure after a major event would have to be separately assessed at that time. In a November 2007 letter from Telesis to Stellar Management Company, it was also recommended that selected concrete masonry walls in the basements of the tower buildings be retrofitted as a means of improving the reliability of exit corridors. The letter noted that retrofit work had been ongoing;¹¹ this work is expected to be completed within the next few years. These are existing conditions that are not the subject of the EIR and are being ameliorated by ordinary rehabilitation and retrofit work, as recommended.

Comments also express concerns about the seismic performance of residential towers that might be located in areas of potential liquefaction. As noted above, there are two relatively limited locations of potential liquefaction on the Project Site, as shown Figure V.N.1. The Telesis 2006 report addresses this issue specifically. That report notes that the towers located in the area of potential liquefaction are supported by deep driven concrete piles and states that, “The piles provide a significant mitigation of the potential for damages to the buildings from liquefaction-caused distortions of the ground surface. Therefore, these concrete buildings are evaluated as not susceptible to significant liquefaction damage potential.”¹²

Comments also note that the Parkmerced towers were constructed with a material identified as Sika Plastiment. The comments appear to imply, though they do not state explicitly, that this is an indication of lack of stability that is not sufficiently addressed in the EIR. Plastiment is a water-reducing and retarding concrete admixture, used to control concrete set times and reduce the risk that the concrete will begin to set while it is still being put in place. It is a conventional construction material. Plastiment was first used in the 1930s; it might have been innovative when it was used at Parkmerced, but it is still in routine use today and continues to be produced by the same manufacturer. Sika makes several concrete admixture products, of which Plastiment is one. The manufacturing company is a 100-year-old, multi-national firm. Use of Plastiment as an additive to the concrete during construction provides no evidence that the towers at Parkmerced are structurally unsound. As explained earlier in this Master Response, the towers have been evaluated and found to be sound.

¹¹ Letter of Charles Thiel, Principal, Telesis Engineering to Mr. Seth Mallen, Director of Construction, West Coast Operations, Stellar Management, 3711 Nineteenth Avenue, San Francisco, Cal 94123, November 20, 2007. This document is on file with the San Francisco Planning Department, 1650 Mission Street, Suite 400, and is available for public review as part of the project file, in Case No. 2008..0021E.

¹² *Telesis 2006*, p. 11.

MASTER RESPONSE A.4: ALTERNATIVES

1. INTRODUCTION

Many comments raise issues related to alternatives evaluated in the EIR, and others request consideration of variations on the alternatives in Chapter VII, Alternatives to the Proposed Project, or alternatives different from those in Chapter VII. Comments also request information regarding feasibility of alternatives. This Master Response addresses these issues.

The following comments discuss alternatives and are responded to either entirely or in part in this Master Response: TR.7.1, TR.7.2, TR.7.5, TR.26.2, 2.2, 2.3, 2.5, 3.2, 5.5, 7.1, 10.10, 12.2, 12.14, 16.1, 16.2, 16.4, 16.5, 16.6, 17.17, 17.24, 17.25, 17.26, 22.2, 28.9, 30.1, 30.4, 46.7, 54.A.1, 54.A.7, 54.A.10, 54.A.24 – 54.A.26, 54.A.28, 54.A.31, 54.A.34, 54.A.43, 54.A.48, 54.A.49, 54.A.51, 54.B.1, 54.B.3 – 54.B.6, 54.B.11, 54.B.22, 54.B.25, 54.B.27, 54.B.28, 54.B.29, 54.B.31 – 54.B.38, 54.B.40, 54.B.46, 54.C.2, 54.C.4 – 54.C.12, 54.C.14 - 54.C.16, 54.C.18, 54.C.19, 54.C.21 – 54.C.24, 54.C.27, 54.C.32, 54.C.37 – 54.C.43.

2. REQUIREMENTS FOR ALTERNATIVES IN EIRS

2.1 Types of Alternatives

An EIR is required to analyze a reasonable range of alternatives to a proposed project that could feasibly attain most of the basic project objectives, and would avoid or substantially lessen one or more of the significant environmental effects of the Proposed Project (see State CEQA Guidelines Section 15126.6). The alternatives need not meet all of the project objectives. An EIR need not consider every conceivable alternative to a project, but must include a reasonable range of potentially feasible alternatives.

The main purpose of presenting a range of alternatives to a proposed project is to focus on alternatives that are capable of reducing or eliminating any significant effects of the proposed project identified in the EIR, and to foster informed decision-making and public participation. For example, the EIR includes a preservation alternative that fully mitigates the impact to the historic resources, as well as an alternative that reduces, but does not fully mitigate, that impact so that decision-makers can compare the policy trade-offs among these two alternatives and the Proposed Project.

The range of potential alternatives is limited to those that could feasibly attain most of the basic objectives of the proposed project. Among the factors to be considered in feasibility are site suitability, economic viability, general plan consistency, jurisdictional boundaries, and whether the project sponsor can reasonably acquire or have access to an alternative site (CEQA Guidelines Section 15126.6(f)(1)).

EIRs are also required to analyze the No Project Alternative. The purpose of presenting the No Project Alternative is to allow decision-makers to compare the impacts of the proposed project with the impacts of not approving the proposed project. When the proposed project is a development project on a specific site, the No Project Alternative is generally a scenario with no changes at the project site and no construction activities. In some cases, the No Project Alternative may result in changes to resolve a pre-existing problem or to meet regulatory requirements applicable to the project site that are unrelated to the proposed project being evaluated in an EIR. When the proposed project is a revision of an existing regulatory program, the No Project Alternative is the continuation of the existing regulations, with an analysis of the result of potential development under those regulations.

An EIR should identify alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and explain the reasons underlying this determination. Among the factors that may be considered are failure to meet most of the basic objectives of the proposed project and inability to avoid significant environmental impacts.

The final determination of the feasibility of alternatives is made by the project decision-makers, based on substantial evidence in the entire record, which includes, but is not limited to, information presented in the EIR, comments received on the Draft EIR, and responses to those comments.

An environmentally superior alternative must be identified from among the alternatives selected for evaluation in the EIR. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify another environmentally superior alternative from among the others evaluated in the EIR.

2.2 Selection of Alternatives for the Parkmerced EIR

In addition to the required No Project Alternative, which would retain all existing buildings, landscaping, streets, and infrastructure in their current condition, the EIR analyzed five alternatives to the Proposed Project: Alternative B, Buildout Under Current Zoning Regulations; C, Retention of the Historic District Central Core; D, Partial Historic District; E, Full Project Buildout with Transit Options; and F, No Muni Realignment. A graphic illustrating each alternative is presented in the EIR (see Figures VII.1-VII.6, pp. VII.3, VII.7, VII.23, VII.37, VII.49, and VII.63, respectively).

The alternatives analyzed in the EIR were developed in part to identify those that could avoid or substantially lessen one or more of the significant impacts identified for the Proposed Project. Significant impacts are described in the EIR in Chapter V, Environmental Setting and Impacts, and have been identified for the following topics: Aesthetics, Historic Architectural Resources,

III. Comments and Responses

A. Master Responses

A.4: Alternatives

Cultural Resources (Archaeological and Paleontological Resources), Transportation and Circulation, Noise, Air Quality, Wind, Biological Resources, Geology and Soils, Hydrology and Water Quality, and Hazards and Hazardous Materials. Many of these impacts can be reduced to less-than-significant levels with mitigation measures identified in Chapter V. However, as discussed in Section VI.B, Significant Unavoidable Effects, some impacts related to Aesthetics, Historic Architectural Resources, Transportation, Noise, Air Quality, Wind, and Biological Resources would be significant and may be unavoidable even with the implementation of mitigation measures. Some alternatives, including B, Current Zoning Alternative, and C, Retention of the Historic District Central Core, would reduce or eliminate some of these significant impacts.

Other alternatives, such as E, Full Project Buildout with Transit Options Alternative, and F, No Muni Realignment Alternative, analyze various transportation scenarios that could occur based on decisions that could be made later, following consideration of the Proposed Project by the Planning Commission, by the San Francisco Municipal Transportation Agency, or by the California Department of Transportation (Caltrans), the agency with jurisdiction over 19th Avenue.

Alternative B, Buildout Under Current Zoning Regulations, was selected to address development of the Project Site with none of the revisions to the Planning Code or Zoning Map included in the Proposed Project. This alternative could be considered another approach to a No Project alternative, in that it allows a comparison to the impacts that would occur if a development project were to occur on the Project Site without revisions to the existing regulatory plan applicable to the site (see CEQA Guidelines Section 15126.6(e)(3)(A)). In this particular case, the Current Zoning Regulations Alternative would allow more residential units than the number of units included in the Proposed Project. This alternative also serves as an alternative development program, because it provides a higher residential density scenario than the Proposed Project, but with no new commercial/retail uses and no new recreational uses. This alternative would not include wind turbines and therefore would not result in the biological impacts involving effects on migratory birds and bats.

Alternative C, Retention of the Historic District Central Core, was selected to reduce or avoid the significant and unavoidable impacts on visual resources and historic architectural resources. The EIR finds that demolition of all buildings on the Project Site except the 11 residential towers would result in significant and unavoidable impacts to the Parkmerced historic district historical resource because the district is eligible for inclusion in the California Register of Historical Resources (see Section V.D.a, Historic Architectural Resources, pp. V.D.27-V.D.29). The Historic District Central Core Alternative would retain enough of the existing site plan, buildings, and landscaping to justify its inclusion in the California Register as a historic district. Retention of the historic core would also reduce the significant visual impacts identified in Section V.B,

III. Comments and Responses

A. Master Responses

A.4: Alternatives

Aesthetics, pp. V.B.20-V.B.21. In addition, because there would be more than 3,000 fewer residential units and less retail and office space, some traffic and transit impacts would be reduced to less-than-significant levels. Without the wind turbines included in the Proposed Project, this alternative would reduce some of the significant unavoidable impacts to migratory birds and bats. Other biological resources impacts related to constructing and operating a stormwater collection system with discharge to Lake Merced would be avoided with this alternative, although they could be reduced to less-than-significant levels with mitigation measures identified for the Proposed Project.

Alternative D, Partial Historic District Alternative, would not avoid the significant impacts on visual or historical resources, but would partially reduce those impacts and would meet more of the Project Sponsor's objectives than Alternative C. By comparing this alternative to Alternative C, Retention of the Historic District Core, and comparing these two alternatives to the Proposed Project, decision-makers can better analyze any trade-offs presented between consistency with the Project Sponsor's objectives, on the one hand, and mitigation of the Proposed Project's impacts to historic resources, on the other.

Alternative E, Full Project Buildout with Transit Options, provides an alternative approach to the proposed realignment of the Muni M Ocean View light rail line and adds an extension of the J Church light rail line from its existing terminus at Balboa Park to Holloway Avenue in the vicinity of the Project Site. This alternative was included to provide an analysis of the changes in impacts that could result with changes to the transit components of the Proposed Project. This alternative would retain tracks in the median of 19th Avenue, unlike the Proposed Project, and would eliminate one of the proposed left turn opportunities from 19th Avenue into the Project Site. This would eliminate one significant traffic impact compared to the Proposed Project, and would create one new significant impact.

Alternative F, No Muni Realignment, would retain the M Ocean View light rail line tracks in their existing configuration in 19th Avenue. This alternative addresses the possibility that realignment of the light rail tracks, which would require crossing 19th Avenue in two new locations, might not be approved by the California Department of Transportation (Caltrans). (Caltrans has jurisdiction over 19th Avenue as a State Highway [State Route 1]). This alternative would result in traffic impacts similar to those of the Proposed Project, but would reduce two significant transit impacts to less-than-significant levels.

These six alternatives present a reasonable range of alternatives for the Parkmerced EIR. The required No Project Alternative is included, along with an alternative that would not require any revisions to the existing regulatory scheme applicable to the Project Site. The significant and unavoidable visual and cultural impacts would be reduced or avoided in alternatives analyzed in the EIR, as would some of the significant transportation and biological resources impacts.

2.3 Alternatives Considered but Rejected

Several comments cite the “Laurel Heights” decision by the California Supreme Court (*Laurel Heights Improvement Association of San Francisco, Inc. v. Regents of the University of California*, 47 Cal 3d, 376 (1988)). This case is about an EIR that did not discuss any alternatives in detail, covering the entire range of alternatives in three pages. The decision explains that if alternatives were considered and rejected as infeasible, the reasons for rejecting the alternatives should be presented in the EIR. The Parkmerced EIR presents two alternatives that were considered and rejected, unlike the EIR in the 1988 Laurel Heights decision. The two potential preservation alternatives that were considered but rejected are described in Chapter VII, Section G. These alternatives were not analyzed further because they were rejected as infeasible, would not reduce project impacts or would result in greater impacts than the Proposed Project, or failed to meet most of the Project Sponsor’s basic objectives. The EIR includes six alternatives that are fully evaluated.

An alternative that would retain all existing buildings and much of the existing landscape, and add residential density with infill development was considered during preparation of the Draft EIR (see pp. VII.74 - VII.77). Locations for infill development were selected, ultimately resulting in possible 1- to 4-story buildings in the carports between existing garden apartments and 14-story towers adjacent to existing towers. These are shown in Figure VII.7 on p. VII.75. The alternative would add about 1,400 residential units to the 3,221 existing units. No new retail/commercial space or new recreational facilities would be provided. The reasons that this alternative was not analyzed in detail in the EIR are presented on p. VII.78. In particular, an evaluation of this infill development alternative showed that the infill development would result in the same significant impacts on the Parkmerced historic district resource, without fulfilling the Project Sponsor’s basic objectives of providing high-density housing near a commercial core.

A preservation alternative that would preserve the west side of the Project Site, rather than the historic core presented in Alternative C, Retention of the Historic District Core, was also considered but ultimately rejected (see pp. VII.77 – VII.78). This alternative would meet more of the Project Sponsor’s objectives than the infill development alternative, in that it would provide a greater number of additional residential units (a total of 6,465 units compared with the existing 3,221), and would accommodate new retail/commercial uses and recreational space. The reasons that this alternative was not analyzed in detail in the EIR are presented on p. VII.78. The alternative would not avoid a significant impact on historic architectural resources, because the retained portion of the existing development would not be sufficient to convey its architectural and historic significance. This determination is supported with more detail in an analysis by Page & Turnbull, Inc., cited on p. VII.78. Therefore, the alternative would not meet the basic requirements for an alternative, to reduce or eliminate one or more significant environmental effects of the Proposed Project, unlike Alternative C, Retention of the Historic District Core.

3. ALTERNATIVES SUGGESTED IN COMMENTS

Some comments request that the EIR present an alternative that would meet the Secretary of Interior Standards for historic resources and protect the cultural landscape of the Project Site, and other comments request additional preservation alternatives. Alternative C, Retention of the Historic District Central Core, meets the Secretary's Standards and would retain enough of the existing buildings, landscaping, and site plan to preserve a historic district that would remain eligible for the California Register of Historical Resources. There is no requirement to present more than one preservation alternative, although the EIR includes consideration of a partial preservation alternative (pp. VII.36-VII.48), and explains why two other potential preservation alternatives were not considered in detail (pp. VII.74-VII.79).

Comments request additional alternatives that would reduce or remove the proposed retail and office space, or that would reduce the amount of residential parking proposed. The EIR includes two alternatives with less or no retail and office space: Alternative B, Buildout Under Current Zoning Regulations, would not develop new commercial or retail space; Alternative C, Retention of the Historic District Central Core, would provide less new retail and office space than in the Proposed Project. Reducing the amount of parking would result in an increased parking deficit over that discussed in the EIR on pp. V.E.103-V.E.104, but would not reduce any of the significant environmental impacts identified for the Proposed Project. In addition, reduced parking could affect the marketability of the residential units, which could in turn affect the feasibility of providing some of the transit facilities included in the Proposed Project. Therefore, an alternative with less parking was not considered in the EIR. (See also Master Response A.2, Transportation and Circulation, Section 2.3.)

Some comments request that the sustainability features of the Proposed Project be included in Alternative C, Retention of the Historic District Central Core. The Proposed Project's features to capture stormwater runoff would require more open areas and street space than could be provided in this alternative in order to accommodate biogutters, bioswales, streams, a pond, and other facilities that would capture and filter stormwater. In addition, the incorporation of these sustainability features into the existing landscape (designed by Thomas Church) would impact the integrity of the historic district. The purpose of this alternative is to analyze an alternative, as required by CEQA, that fully mitigates impacts to the identified historic resource. Inclusion of these sustainability features in this Alternative C would not lessen the significant and unavoidable historic resources impacts identified in the Draft EIR. Therefore, these sustainability features were not included in this Alternative. However, this does not preclude decision-makers from including such features as part of any decision to approve an alternative to the Proposed Project.

Relocating the Muni M Ocean View light rail line within the Project Site would not be feasible because existing streets are not wide enough to accommodate Muni and adding light rail tracks

III. Comments and Responses

A. Master Responses

A.4: Alternatives

and stations would impact the historic district. Some energy reduction could be accomplished in the existing, retained buildings by upgrading heating systems, but the garden apartments were not constructed to conserve energy and would not be as energy efficient as new structures. New buildings constructed under this alternative would include energy conservation features; however, the reduction in energy demand would not be as great as with the Proposed Project. Under this alternative, wind turbines would not be constructed since much of the street and sidewalk network would not be redeveloped, and therefore installation of the necessary infrastructure required for the district energy system would not be feasible. Adding photovoltaic cells to the new buildings would help to reduce energy consumption, but not to the level expected to be achieved by the Proposed Project. The existing landscaping that would be retained would continue to require more water for irrigation than the native and drought-tolerant landscaping included in the Proposed Project; changing the landscaping to drought-tolerant plants would impact the cultural landscape intended to be preserved in this alternative.

Many comments suggest alternatives that would provide a number of residential units similar to the number included in the Proposed Project by using property outside the Project Site, such as the adjacent San Francisco Unified School District site across Font Boulevard from the Project site, the privately-owned 800 Brotherhood Way site, and/or portions of the parking lots at the privately owned Stonestown Galleria shopping center. Other suggestions extend to properties outside of the City and County of San Francisco, in Daly City near the Daly City BART station or above Interstate-280 on Caltrans property in Daly City. The Project Sponsor does not own any of these properties, and has no plans to acquire any of them. Several of the suggested locations have had development proposed or approved in the recent past, including 800 Brotherhood Way (approved for residential development) and Stonestown (proposed for residential and additional retail uses, with a Draft EIR published in 2003 but withdrawn from consideration in 2004). Consideration of an alternative location is identified as one of the range of alternatives that should be considered in an EIR, except when there is no feasible alternative location. This is the case with the Proposed Project, which proposes to rehabilitate and reconstruct an existing project site. The following text has been added to p. VII.78, before Section H, Environmentally Superior Alternative, to clarify this issue:

Alternative Location: No alternative location has been considered for the Proposed Project. The Proposed Project would rehabilitate and reconstruct an existing project site, already owned and operated by the Project Sponsor. The Project Sponsor does not own other property in the City and County of San Francisco, and does not expect to acquire property of similar size to the Project Site. There are relatively few alternative locations in the City of over 150 acres in single ownership that would accommodate a similar increased density to provide for about 8,900 residential units, over 200,000 square feet of retail/commercial space, and 68 acres of recreational and open space uses, and none are located on the west side of the City.

III. Comments and Responses

A. Master Responses

A.4: Alternatives

Comments suggest alternatives that not only appropriate property not under the control of the Project Sponsor, but also propose further changes to the transit system in the southwest quadrant of the City and beyond, providing new transit facilities and rerouting existing transit lines. These alternatives address area-wide and regional issues that extend beyond the Proposed Project and the Project's impacts, and in some cases would be beyond the City's ability to study and plan for without collaboration with multiple other public agencies, including San Mateo County, Daly City, BART, and Caltrans. The City has initiated area-wide transportation studies for the southwest quadrant, including the *19th Avenue Corridor Study*, and the City has implemented and is considering other recommendations of its Transit Effectiveness Program, as discussed in Master Response A.2, Transportation and Circulation, Section 2.5. These transit improvements are not part of the Proposed Project or its alternatives, but were taken into consideration in the transportation analysis.

Comments request that the development phases described for the Proposed Project be considered as alternatives to the Proposed Project. Each of the proposed development phases builds on the prior phase, and is not an alternative to the Proposed Project, but rather is the Proposed Project. Thus, Phase 2 assumes completion of Phase 1, and continues with development on other areas of the Project Site, until the site is completely built out, as analyzed in the EIR. Analyzing these phases separately could result in under-estimation of the impacts of the Proposed Project. CEQA requires a lead agency to examine the whole of a project, analyzing all of its various components and phases in order to understand the full scope of potential impacts. To do otherwise, for example, to look at each phase of this proposed project separately, could result in a piecemeal analysis of the project and its potential impacts. It is possible that one commentator intended that each of the phases be considered as a separate alternative to be analyzed in Chapter VII, Alternatives. This approach would be similar to development of portions of the Project Site, and therefore, would be similar to Alternative C, which provides new development only on the western and southern portions of the Project Site (see Figure III.19: Proposed Phase I Plan, p. III.55, and Figure III.21: Proposed Phase 3 Plan, p. III.59, showing, respectively, Phase 1 with development mainly in the western portions of the Project site, and Phase 3 that would develop portions of the southern and western areas of the Project Site), or Alternative D, which provides new development on all but part of the northwestern area of the Project Site.

A reasonable range of alternatives is required, but an EIR is not required to analyze numerous combinations and permutations of alternatives. Therefore, treating each of the development phases as separate alternatives was not considered in addition to the six alternatives analyzed in the EIR.

4. ALTERNATIVES SUPPORTED IN COMMENTS

Several comments indicate support for one or more of the alternatives analyzed in Chapter VII, Alternatives to the Proposed Project, in the EIR, particularly for Alternative C, Retention of the Historic District Central Core. Some of these comments note that this alternative maintains the eligibility of Parkmerced as a district on the California Register of Historical Resources. Decision-makers will consider these comments in making determinations as to whether to approve the Proposed Project or one of the alternatives analyzed in the EIR.

5. FEASIBILITY OF ALTERNATIVES

Several comments request information regarding feasibility of alternatives. The feasibility of the six alternatives analyzed in the EIR has not been finally determined. All were determined to be potentially feasible in that they would attain most of the basic objectives identified in Chapter III, Project Description, all are within the boundaries of the property under the control of the Project Sponsor, and all are capable of being constructed on the Project Site.

Formal determinations of feasibility will be made as part of the CEQA findings made by decision-makers as part of their deliberations on the Proposed Project. As noted in CEQA, a project should not be approved if there are feasible alternatives available which would substantially lessen the significant environmental effects; however, specific economic, social, legal, technological, or other conditions may make an alternative infeasible (CEQA Guidelines Sections 15021 and 15091). Reasons why any alternative is found by decision-makers to be infeasible will be provided in those findings; the reasons will need to be supported by substantial evidence in the record. The evidence need not be presented in the EIR, however. Analysis of the economic feasibility or infeasibility of an alternative is typically presented in separate memoranda or reports made available to decision-makers during consideration of actions on a Proposed Project. Information on social conditions that might make an alternative infeasible could be available in reports prepared by the lead agency or other public agencies, such as housing needs analyses and unemployment statistics. The requests for further information about feasibility will, therefore, be answered in the findings adopted by the Planning Commission and Board of Supervisors and in supporting evidence in the record outside of this EIR, as the City's decision-makers consider the Proposed Project for action.

III.B PUBLIC HEARING COMMENTS AND RESPONSES

SAN FRANCISCO PLANNING DEPARTMENT

PARKMERCED PROJECT, 3711 19TH AVENUE

(ITEM 19, CASE NO. 2008.0021E)

PUBLIC HEARING

ON THE DRAFT ENVIRONMENTAL REPORT

THURSDAY, JUNE 17, 2010

SAN FRANCISCO CITY HALL

DR. CARLTON B. GOODLETT PLACE

ROOM 400

SAN FRANCISCO, CA

ORIGINAL

REPORTED BY: FREDDIE REPPOND

Clark Reporting & Videoconferencing

2140 Shattuck Ave., Ste. 405

Berkeley, CA 94704

510.486.0700

A P P E A R A N C E S

05:25:53

FOR THE PLANNING COMMISSION:

- President Ron Miguel
- Commissioner Michael J. Antonini
- Commissioner Kathrin Moore

05:25:53

- Commissioner Christina R. Olague
- Commissioner Hisashi Sugaya
- Linda D. Avery, Commission Secretary

PLANNING DEPARTMENT STAFF:

- Rick Cooper

05:25:53

FROM THE PUBLIC:

- Cathy Lentz
- Bernard Choden
- Elizabeth Ranieri
- Arne Larsen

05:25:53

- Bert Hill
- Jacklynn Jweinart
- Aaron Goodman
- Julian Lagos
- Mary Beth Sanders

05:25:53

- Fred Kriebel
- Linh Le
- David Mecker
- Jim Coppfer
- Daniel Phillips

05:25:53

- 1 Jeremy Setzer
- 2 Joel Koppel
- 3 Maria Elena Guerrero Engber
- 4 Dennis Norrington
- 5 Kevin McDonough
- 6 Mitchell Omemberg
- 7 Michael Pappas
- 8 Dr. Terrance Faulkner, JD
- 9 Kate Lefkowitz
- 10 Dean Preston
- 11 Inga Horton
- 12 Mary Ann Miller
- 13 Jeanne D'Arcy
- 14 Jeanne Scott
- 15 Maria-Elena Mestayer
- 16 Judith Flynn
- 17 Dan Weaver
- 18 Nan Roth
- 19 John Kim

---oOo---

- 21
- 22
- 23
- 24
- 25

1 [The hearing began at 5:39 p.m.]

2 COMMISSION SECRETARY: Good afternoon. This
3 is again the regular meeting of the Planning Commission.
4 Let me just remind everyone to turn off your pagers,
5 your cellphones, and any electronic devices that may
6 sound off during these proceedings.

7 And I'll ask these gentlemen who are blocking
8 the door to find a seat. If you feel that you must
9 engage in a secondary discussion, we'll ask you that you
10 take those discussions outside, as they become extremely
11 disruptive to the process. Also, when you speak before
12 the Commission, we ask that you speak directly to the
13 microphone, approximately three to six inches away. And
14 we ask that you spell -- state and spell -- your last
15 name for the record.

16 Roll call. And again, because it's such a
17 long recess, we're going to begin the proceeding with
18 roll call.

19 Commissioner Moore.

20 COMMISSIONER MOORE: Here.

21 COMMISSION SECRETARY: Commissioner Sugaya.

22 COMMISSIONER SUGAYA: Here.

23 COMMISSION SECRETARY: Commissioner Lee was
24 here earlier, but had to leave.

25 Commissioner Antonini.

1 COMMISSIONER ANTONINI: Present.

2 COMMISSION SECRETARY: Commissioner Miguel.

3 PRESIDENT MIGUEL: Here.

4 COMMISSION SECRETARY: Commissioner Olague.

5 COMMISSIONER OLAGUE: Here.

6 COMMISSION SECRETARY: Commissioner Borden is
7 absent.

8 Commissioners, the item before you at this
9 time in your calendar is Item No. 19, Case No.
10 2008-0021E, Parkmerced project at 3711 19th Avenue.
11 This is a public hearing on the draft environmental
12 impact report.

13 RICK COOPER: Good evening, President Miguel,
14 Members of the Commission. I am Rick Cooper from the
15 major environmental analysis section of the planning
16 department. This is a hearing to receive public
17 comments on the draft environmental impact report for
18 the proposed Parkmerced project, Case No. 2008.0021.

19 As you heard in greater detail in the recent
20 informational presentation, the proposed Parkmerced
21 project would substantially redesign and reconfigure the
22 Parkmerced complex, including a substantial increase in
23 residential units, new commercial and retail services,
24 new recreation facilities and open space, new transit
25 facilities, and improved utilities. The existing

1 apartments located in tower buildings onsite would be
2 retained; and over a period of approximately 20 years
3 the remaining apartments would be demolished and
4 replaced and new units would be added, resulting in a
5 total of about 8,900 residential units on the site, or
6 about 5,679 net new units.

7 Proposed transportation improvements will
8 include rerouting existing Muni Metro M Oceanview line
9 through the site. Infrastructure improvements would
10 include installation of renewable energy sources, such
11 as wind turbines and photovoltaic cells, as well as a
12 system to capture and filter stormwater runoff and allow
13 it to percolate into the groundwater or flow into Lake
14 Merced.

15 The DEIR identifies potentially significant
16 unavoidable environmental impacts on esthetics, historic
17 architectural resources, transportation, noise, air
18 quality, wind, and biological resources.

19 Please note that staff is not here to answer
20 comments today. All comments made today will be
21 transcribed and responded to in writing in the Comments
22 and Responses document which will respond to all verbal
23 and written comments received and make revisions to the
24 draft EIR as appropriate.

25 I would like to remind all speakers that this

1 is not a hearing to consider approval or disapproval of
2 the proposed project. That hearing will follow the
3 final EIR certification. Your comments today should be
4 confined to the adequacy and accuracy of the
5 environmental impact report.

6 I would also like to request that you speak as
7 slowly and clearly as possible so that the court
8 reporter can produce an accurate transcript. Also,
9 commenters should state their name and address so that
10 they can be properly identified and so that they can be
11 sent a copy of the Comments and Responses when it's
12 completed.

13 After hearing comments from the general
14 public, we also receive any comments on the draft EIR
15 from the Commissioners. The public comment period for
16 this project began on May 12th, 2010, and extends until
17 5:00 p.m. on June 28th. The Historic Preservation
18 Commission held a hearing on the draft EIR on June 2nd.

19 This concludes my presentation on the matter.
20 And unless the Commissioners have any questions, we can
21 open the public hearing.

22 PRESIDENT MIGUEL: Thank you.

23 I have a number of speaker cards. Cathy
24 Lentz. Elizabeth Ranieri. Bernard Choden.

25 CATHY LENTZ: Good evening, Commissioners. My

1 name is Cathy Lentz. I have grown up in Parkmerced and
2 lived here for 57 years.

3 In my heart and soul I feel this development
4 project is not right. From the beginning the New York
5 developers have slandered the original Parkmerced
6 development. It was an innovative design meant to
7 integrate people and nature. They've slandered the
8 original design to push forward their own egocentric and
9 impersonal design, where individuals no longer matter. TR1.1
10 Their design shows domination over nature, wildlife, and
11 people. They have the audacity to suggest hundred-foot
12 windmills right across from Lake Merced Boulevard in the
13 flight path of birds and bats. Because of their slander
14 of the original design, I question their integrity.

15 Now, these very developers are facing
16 foreclosure on their property in Harlem. I feel for the
17 people of Harlem, Riverton. It would be irresponsible
18 for the Planning Commission to approve this plan in lieu
19 of the recent financial facts. The project should be TR1.2
20 tabled. There should be no political bailout or we
21 could end up with a hole in the ground and the project
22 abandoned. And what will happen to the present 6,000
23 residents of Parkmerced who call this place their home?

24 Having closed my own comments, I need to make TR1.3
25 one statement about PRO, which is a Parkmerced resident

TR.1.3
con't

1 organization. It is in absolute chaos. We officially
2 do not support this project but our president is in
3 support of it. We have a quorum of four people. So
4 whatever is told to you is not the vast vision of the
5 tenants of Parkmerced.

6 Thank you very much for your time.

7 I have something from my neighbor who has
8 written a letter, too, of support. Thank you.

9 BERNARD CHODEN: I'm Bernie Choden. I'm with
10 San Francisco Tomorrow, for the most part. I'll try to
11 read this to you.

12 The EIR must have mitigation measures and
13 resources and institutions to deal with the toxic
14 safety, being not too far from the San Andreas fault,
15 and the gentrification displacement that would be
16 incumbent upon this project. There must be proof. It
17 is not there in the EIR, given the financial
18 difficulties of the proposed developers.

TR.2.1

TR.2.2

19 I'm going to suggest as a possible mitigation
20 measure to provide the underpinnings for making this
21 project possible. One, establish an autonomous
22 contractual development area for the entire area of
23 impact.

TR.2.3

24 Two, the tenants organize a limited equity
25 cooperative that would work both with the project area

1 committee of the Redevelopment Agency and with the
2 developer and contract with the developer to provide the
3 management and development of the project. I think that
4 would provide environmental justice, equity for the
5 developer, and a way out.

TR.2.3
con't

6 Thank you for your time.

7 PRESIDENT MIGUEL: Thank you.

8 MR. CHODEN: And I'll type this up.

9 PRESIDENT MIGUEL: Elizabeth Ranieri.

10 ELIZABETH RANIERI: Hello, Commissioners. My
11 name is Elizabeth Ranieri, R-a-n-i-e-r-i. I am a local
12 business owner in San Francisco. And I am here to speak
13 in favor of the Parkmerced project.

14 I am familiar and supportive of this new plan
15 and proposal and feel that the EIR adequately addresses
16 the project issues as well as analyzes its potential
17 impact. The new Parkmerced will achieve a critical goal
18 of providing more homes of greater diversity close to
19 SF's workplace. It will attract more families to the
20 city. It will improve the public transit and serve as a
21 national model of a new green neighborhood. It will
22 greatly reduce water and energy use and, most
23 importantly, contribute to San Francisco's goals for a
24 healthy green future.

TR.3.1

25 It will transform the badly constructed

1 midcentury homes and provide new amenities of local
2 retail, parks, daycare, and schools and bring an organic
3 urban farm to San Francisco. It will create a vital
4 community within walking distance and reduce our
5 dependence on the car. Lastly, the new Parkmerced
6 community is an opportunity for the Bay Area to move
7 toward an ecologically responsible way of urban life.

TR.3.1
con't

8 Thank you very much.

9 PRESIDENT MIGUEL: Thank you.

10 Arne Larsen, Dan Weaver, Bert Hill.

11 ARNE LARSEN: My name is Arne Larsen; that's
12 L-a-r-s-e-n. I live at 355 Serrano, Apartment M, in
13 Parkmerced. I've lived there since in 1996.

14 I moved in -- and you might recall at that
15 time rents were going up by the week. I'm a minister.
16 I have very little money. I could find almost nothing
17 in town. I moved to Parkmerced and planned to move out
18 after a year. Rent control has kept me there.

19 And I first want to say a good word for rent
20 control, because it stabilizes communities. And that is
21 one of the things that has been an issue addressed by
22 the current landlord. They have taken on that value of
23 the community and tried to make it part of their
24 planning; and I see this as addressing that in several
25 ways.

TR.4.1

1 One is that everyone who has a current lease
2 for an apartment that would be taken down will be able
3 to keep that same lease in the new apartment. The rent
4 will not go up. The original date of the lease will be
5 what it was. And it will just the same financially as
6 if they were in that existing apartment.

7 Something like this development is something
8 I've always wanted since I decided I was going to stay
9 in Parkmerced, because in Parkmerced it's very difficult
10 to find anything to do or anywhere to go just by walking
11 there. I wind up having to drive to have a cup of
12 coffee in a place I enjoy with a friend. There's just
13 nothing there to do. And so I like the idea of transit
14 coming through the neighborhood, because that will bring
15 more business that would go through the area where the
16 businesses are and the new ones would be and would help,
17 I think, with that, having the clientele for businesses
18 so they will be there for people who live there and we
19 won't have to drive or use public transit as much.

20 I consider -- I always hear about San
21 Francisco needing more housing. That's a perfect place,
22 I think, to do it in the city. It's a place where there
23 is a capacity for that growth. And that density, again,
24 would also help with making that neighborhood where I
25 can just do things where I live instead of having to go

TR.4.1
con't

1 elsewhere.

2 These landlords have also done a nice job with
3 changing the whole practice with pass-throughs. The
4 previous landlord, which was primarily the JP Morgan
5 Chase Strategic Investment Fund, made pass-through after
6 pass-through after pass-through for work they did on the
7 property. This landlord has painted the buildings
8 without a pass-through, replaced elevators without a
9 pass-through, and done other improvements without a
10 pass-through. It's an entire shift of the culture of
11 the landlord and it has a good effect on the
12 relationship between landlord and the tenants and has a
13 good effect on tenants' pocketbooks, obviously. It had
14 got to the point before where it was almost routine to
15 go to the Rent Board.

16 Thank you.

17 PRESIDENT MIGUEL: Thank you. Dan Weaver and
18 Bert Hill. Bert, you're up.

19 BERT HILL: Chair Miguel and Commissioners, my
20 name is Bert Hill and I am speaking as a board member
21 for Livable City. I am a thirty-five-year neighbor of
22 the West of Twin Peaks -- in the West of Twin Peaks. My
23 wife is employed at San Francisco State University.

24 I know the area pretty well. I have reviewed
25 parts of the environmental document and, from what I

TR.4.1
con't

TR.5.1

1 have completed, believe it has done an adequate job.
2 Like any project of this magnitude, there will be areas
3 that could be more comprehensive. There's been a great
4 emphasis on well-thought-out conservation, community,
5 and sustainability elements, notably an emphasis on
6 human-powered transportation, especially within a mile
7 radius; exceptional work done on close access to
8 efficient public transportation; design of run-off
9 processes to ensure the future of water entering lake
10 Merced; water conservation design to significantly
11 reduce per capita consumption level and waste water
12 requiring sewage treatment; real-time monitoring of
13 utilities readable within each unit to promote
14 individual conservation -- which I think is a new one, I
15 haven't seen that one before; well-thought-out bicycle
16 paths, such as a Brotherhood Way route along the plateau
17 with bicycle stream along the frontage; not to mention
18 solar panels and other forms of sustainable energy
19 generation.

20 While supporting the DEIR, we would like to
21 see further study, including the separate properties in
22 the triangle and 800 Brotherhood Way would encourage the
23 same intelligent approaches taken in the rest of the
24 project.

25 Those of you who remember back to 800

TR.5.1
con't

TR.5.2

1 Brotherhood Way -- and I spoke at that one -- it was
2 pretty wasteful in its design. And we hope if it does
3 get included, when it does it will follow the same
4 principles as the rest of Parkmerced.

TR.5.2
con't

5 Routing of the metro line to Daly City instead
6 of Balboa Park would provide a public transportation
7 alternative for commuters traveling southbound from the
8 west side via BART and Caltrain. This technically is
9 not as much Parkmerced issue as a Muni metro. We'd like
10 to say that at the same time.

TR.5.3

11 Finally, there is too much parking.
12 Off-street facilities should accommodate personal
13 storage. Families of all types need to store things.
14 Of course, the personal vehicle could be a form of
15 personal storage, but a far smaller amount of space. By
16 the time this project is completed, human-influenced
17 climate change will not a be debate but a struggle to
18 adapt. We should make sure more high-density
19 transit-oriented housing is designed for the future, not
20 a legacy of the past.

TR.5.4

21 With that, I can answer any questions or I
22 give up my time. Thank you.

23 PRESIDENT MIGUEL: Jacklynn Jweinart. Aaron
24 Goodman. Julian Lagos.

25 JACKLYNN JWEINAT: Good evening. My name is

1 Jacklynn Jweinat. My last name is spelled
2 J-w-e-i-n-a-t. And I'm speaking on behalf of Yousef
3 Realty, who is the present owners of the Parkmerced
4 Shopping Center.

5 When the Parkmerced mixed-use development
6 program was introduced, we became deeply concerned with
7 the idea of a new retail space. Presently the shopping
8 area that exists is 25,000 square feet. The proposed
9 project has a retail space of over 300,000 square feet.
10 That is a significant difference in size. However,
11 Parkmerced ownership has assured us that they would like
12 us to coexist within this project. In an effort to
13 enforce our survival, they have added into their plan an
14 entrance into the original shopping area from 19th
15 Avenue entering into Cambron Drive.

16 The location of the shopping center is below
17 grade behind 19th Avenue and can only be entered into by
18 Crespi Drive or Font Street. It is difficult to
19 acknowledge what is present there without prior
20 awareness or familiarity of the area. Our site needs
21 more attention in that it needs to be more accessible.
22 If this project develops a new pathway into our retail
23 space, it will assure the survival of the small
24 family-owned businesses that have just recently opened.

25 Parkmerced's concern with the survival of our

TR.6.1

1 retail location is greatly appreciated. We appreciate
2 all their cooperation and hard work. And if this
3 project is to go through, it will be a positive movement
4 forward for the Parkmerced community. Thank you.

5 PRESIDENT MIGUEL: Thank you.

6 AARON GOODMAN: Good evening, Commissioners.
7 Aaron Goodman, A-a-r-o-n G-o-o-d-m-a-n, 25 Lisbon
8 Street, San Francisco, California, 94112.

9 Per CEQA Section 15064, public agencies and
10 especially certified local governments must carefully
11 consider any potentially feasible alternative which may
12 avoid or minimize a significant environmental impact.

13 The demolition of an entire community and cultural
14 landscape is significant. And, per the California
15 Resource Code, Section 21002, and CEQA, Section 15126-6,
16 it states the EIR must contain a fair and thorough
17 discussion of potentially feasible alternatives -- not
18 the plural -- which do not involve demolition.

19 The project sponsor's and Planning
20 Department's elimination of Option G-a, the infill
21 preservation option, intentionally and unfairly removes
22 the one option that best serves to mitigate the loss of
23 a cultural landscape site eligible for the state and

24 national register. It also fails to look at the
25 existing zoning and adjacent sold-off sites or the 19th

TR.6.1
con't

TR.7.1

TR.7.2

TR.7.3

1 Avenue Planning Department study for options in
2 development and equity density as a proposal to mitigate
3 the impacts on Parkmerced's prior boundaries.

TR.7.3
con't

4 By ignoring the entire district of
5 Parkmerced's original 191 acres and by submitting
6 long-term programmatic EIRs of the SFSU-CSU master plan
7 and Parkmerced's Vision projects, it ignores the options
8 that protect the integrity of Parkmerced, along with not
9 considering cumulatively the EIRs and future proposed
10 growth, such as at Stonestown, that are noted as
11 possible future developments. The Parkmerced
12 investor's, SFSU-CSU master planner's, and SF Planning
13 Department's joint efforts at limiting the alternatives
14 reviewed are circumventing adequate historical resource
15 review, the addressing of social and low-to-middle
16 income housing impacts, and the needs in the city and
17 county of San Francisco for housing.

TR.7.4

18 This is extreme negligence in the following
19 CEQA state laws and the parameters of the San Francisco
20 General Plan by a public certified agency.

21 Please reconsider your prior decision to
22 elimination Option G-a, based on financial,
23 environmental, and historic preservation principles of
24 sustainable development.

TR.7.5

25 I have brought a couple of photos to show on

TR.7.6

1 the overhead. One is of the overall area of Parkmerced
2 and how it differs from the different street layout.
3 It's a beautiful site. I don't know whether any of you
4 Commissioners have really made it out there, but I
5 strongly urge you to go, because the images are
6 beautiful out there. And you're proposing to destroy a
7 site that renters cherish -- a lot of renters -- they
8 cherish it and have cherished it for years.

TR.7.6
con't

9 This is the historical view of the site. This
10 area between Junipero Serra and 19th Avenue and
11 Brotherhood Way is the real problem. Transit -- that's
12 the real problem we have here. That's the area we
13 should be focusing on. And without getting that transit
14 train up in front, I don't see this development
15 happening. And they shouldn't allow a developer to do
16 it without proper and assured developer agreements that
17 are going to make sure this thing gets built properly.

TR.7.7

18 Thank you.

19 PRESIDENT MIGUEL: Thank you.

20 JULIAN LAGOS: Good evening, Commissioners,
21 and thank you for allowing me to protest this faulty
22 environmental impact report before you tonight
23 pertaining to the future Parkmerced development plans.
24 My name is Julian Lagos. I live at 128 Garces Drive in
25 San Francisco. I have been a resident of this historic

1 diverse and bucolic community -- we know it as
2 Parkmerced -- for the past 17 years. I plan to continue
3 to make it my home.

4 The current EIR fails to legally address the
5 issue of significant impacts these ill-conceived
6 development plans will have on quality of life, traffic,
7 open spaces, wildlife, pollution, health, safety, and,
8 most importantly of all, preservation of affordable
9 housing for working and middle-class people of
10 Parkmerced and San Francisco.

TR.8.1

11 Furthermore, the EIR fails to address how the
12 project will be financed, given the financial insolvency
13 of the current owners and project proponents, Parkmerced
14 Investors Properties LLC, who presently are in default
15 of their loans in the sum of no less than \$500 million.
16 And this was mentioned in the San Francisco Chronicle
17 and New York Times recently.

18 Given the grim economic forecast for the
19 future of both the global economy and its banking
20 system, a reasonable person would surmise that it is not
21 feasible for a project of this magnitude and scale to
22 move forward, given all the aforementioned, unaddressed,
23 and unmitigated major issues it faces, including the
24 displacement of over 3,000 of 5,000 Parkmerced residents
25 without rent control protections.

TR.8.2

1 And I might mention, Commissioners, that the
2 promises made by these owners that all residents that
3 are displaced would be protected is a falsehood. The
4 rent control ordinance does not protect residents who
5 reside in buildings that are built after 1978.

TR.8.3

6 On behalf of SaveParkMerced.org, I strongly
7 urge you to reject this poorly drafted EIR and preserve
8 Parkmerced and affordable housing for generations of San
9 Francisco residents to come. Thank you.

TR.8.4

10 PRESIDENT MIGUEL: Thank you.

11 Please, that just prolongs us.

12 Mary Beth Sanders. Linh Le. Fred Kriebel.

13 MARY BETH SANDERS: Good evening,

14 Commissioners. I am Mary Beth Sanders, S-a-n-d-e-r-s.

15 I am -- I live and work in San Francisco. And I am here
16 today as the co-chair of the project review committee
17 for SPUR, the San Francisco Planning and Urban Research
18 Association.

19 Our project review committee considers
20 projects that we consider to be of city-wide
21 significance and assess them according to criteria
22 related to land use/public realm interface building
23 design and environmental affects. In all cases we are
24 seeking a combination of excellent planning and design
25 solutions that will ensure the positive contribution of

1 each project to a safe, visually pleasing, and vibrant
2 urban setting for the people who live and work in the
3 city.

4 We have reviewed the proposed project at
5 Parkmerced and we have a detailed comment letter which I
6 can distribute. And we understand that this hearing
7 today is about the EIR. And so we won't speak to those
8 comments specifically, except to say that our committee
9 very much supports the urbanization of the Parkmerced
10 site. We feel that the increase in the density on the
11 west side of San Francisco, the very visible commitment
12 to public transportation that the project has shown, the
13 recognition of the need for neighborhood-serving retail,
14 and professional service businesses are all very much in **TR.9.1**
15 line with SPUR's own dedication to the best in urban
16 planning.

17 We particular appreciate the efforts to
18 connect the city to the -- to connect the site to the
19 rest of the city through reintroduction of the city
20 grid -- the street grid. We anticipate the move from a
21 auto-centric site to a transit-oriented plan for such a
22 large parcel will set a welcome example for other large
23 developments in the city. The EIR appears to be quite
24 thorough. We urge you to complete the environmental
25 analysis and move the project forward.

1 Thank you.

2 PRESIDENT MIGUEL: Thank you.

3 FRED KRIEBEL: Good evening. My name is Fred
4 Kriebel. I am the owner of Kriebel and Associates, an
5 independent real estate construction and management
6 company here in the Bay Area. I am not a San Francisco
7 resident, but I have lived in the San Francisco Bay Area
8 for 32 years. I am not retained by the ownership of
9 Parkmerced nor any of the other firms associated with
10 the project.

11 Briefly, some background as a setting for what
12 I'm about to say. Before forming my own company, I
13 worked as an executive for 33 years for various
14 commercial general contractors, a large corporation with
15 owned real estate and their own internal real estate and
16 facility department, and a large multi-family housing
17 developer. I help to develop and build large, dense
18 multi-family apartment buildings, commercial office
19 buildings and improvements, garages, sport facilities,
20 and many other structures.

21 As part of my experience, particularly in the
22 last ten years as vice-president of a multi-family
23 developer, I had the opportunity to see and review
24 multiple environmental impact reports under CEQA. I do
25 not stand here and represent myself as an expert in CEQA

1 and the EIR process or reports, but I do come here to
2 simply say that I have briefly reviewed the draft
3 environmental impact report for the Parkmerced project
4 and in my opinion I believe it to be a thorough and
5 complete document that meets all the requirements of
6 CEQA Title 14 and follows their guidelines for an EIR
7 report as set forth in Chapter 3, Article 9.

8 It is quite a detailed and thorough report
9 with many site plans, layouts, renderings, perspectives,
10 elevations, and narratives which give any agency or
11 jurisdiction and the general public sufficient
12 information about the project, its impacts, possible
13 remedies, remediations, and alternatives to those
14 impacts. In short, I think it's a thorough -- a very
15 thorough and complete report.

16 Just from my personal perspective, I think it
17 is a wonderful project. I think it will be a great
18 benefit to the residents of San Francisco and the entire
19 Bay Area. It will alleviate the chronic housing
20 shortage; yet is very respectful of the current
21 property. It endeavors to minimize inevitable impacts
22 on some of the residents. And, also, the new plan
23 incorporates many green sustainable principles, reducing
24 the per capita impact in natural resources placed on the
25 city of San Francisco.

TR.10.1

TR.10.2

TR.10.2
con't

1 I strongly urge you to continue the process.

2 PRESIDENT MIGUEL: Thank you.

3 LINH LE: Good evening, Commissioners. My
4 name is Linh Le. I'm sorry. I didn't hear it. I and
5 my wife have lived in one of the garden apartments of
6 Parkmerced for more than 35 years. We are Chevron
7 retirees. I am a former purchasing contract manager for
8 Chevron for 15 years.

9 We oppose the above proposed expansion and
10 development project submitted by Stellar Management due
11 to the negative impacts, as listed below.

TR.11.1

12 One, the demolition and disappearance of more
13 than 1,500 landmark and historic residential garden
14 townhouses at Parkmerced.

15 Two, in the past 35 years, traffic jams have
16 already got worse along the 19th Avenue corridor between
17 Junipero Serra Boulevard and Lincoln Way. Traffic will
18 definitely get worse if this proposed expansion is
19 approved by the City and completed unless more serious
20 and costly solutions are considered and adopted.

TR.11.2

21 Three, businesses in other neighborhoods in
22 surrounding and adjacent areas such as Ocean Avenue and
23 19th Avenue, Parkside, Westlake, and West Portal will be
24 seriously affected.

TR.11.3

25 The benefits of this proposed expansion

TR.11.4

1 project to the city and residents of San Francisco are
2 so vague and uncertain, they sound like a pipe dream.
3 The estimated cost of \$1.2 billion of the proposed
4 expansion are too optimistic. No consideration of cost
5 overruns, inflation, or unforeseen circumstances.

6 Finally, in view of its financial problems and
7 current loan default, the survival of Stellar Management
8 is in question. Who is to guarantee that this LLC
9 corporation will be around in San Francisco in the next
10 ten years, let alone thirty years? Thus far, we have
11 already seen four successive owners of Parkmerced. The
12 City and County of San Francisco should be careful not
13 to be drawn into this quagmire. With California and the
14 nation still in the grip of economic uncertainty,
15 continued commercial real estate foreclosures,
16 persistent high employment [sic], and slow growth in the
17 foreseeable future, what investors and banks would have
18 the audacity and impractical business sense to embark on
19 this potential multibillion financial misadventure?

TR.11.4
con't

20 Thank you very much.

21 PRESIDENT MIGUEL: Thank you.

22 Please. I've asked you not to make any
23 demonstrations.

24 David Meckel. Jim Coppfer. Daniel Phillips.

25 DAVID MECKEL: Good evening. My name is David

1 Meckel, M-e-c-k-e-l. I'm director of research and
2 planning at California College of Art here in San
3 Francisco's Potrero Hill neighborhood.

4 First, I'd like to compliment the staff who
5 created this draft environmental impact report. It's
6 one of the most comprehensive, well-written documents
7 I've encountered in recent years, which is saying
8 something when your perspective is from academia, as
9 mine is. I spent time reviewing the three-part 783-page
10 draft EIR as well as the ten appendices. I find that
11 the report more than adequately addresses the importance
12 and impact of the Parkmerced project.

TR.12.1

13 In addition, I'd like to emphasize how
14 important it is for San Francisco to keep making
15 progress on adding diverse types of housing within the
16 city limits -- housing that is close to places of
17 employment, housing that uses less water and energy,
18 housing that is supported by transit and services,
19 housing that is well designed. This draft EIR shows
20 that the Parkmerced plan will do this.

TR.12.2

21 I know it's a big document, but I encourage
22 anyone interested in a sustainable, well-designed
23 livable future for San Francisco to spend sometime with
24 it.

25 Thank you.

1 PRESIDENT MIGUEL: Thank you.

2 JIM COPPFER: Good evening, Commissioners. My
3 name is Jim Coppfer, C-o-p-p-f-e-r. And I am a
4 long-time Parkmerced resident.

5 And I can say I'm one of people who charges at
6 Parkmerced and I don't really fully comprehend the
7 20-year plan and the draft EIR, but I can tell you that
8 living at Parkmerced is a very good experience. And
9 recently I discovered the joys of dog ownership. Just
10 by taking my dog around -- my new dog -- around to
11 various places to run in Parkmerced; and there are lots
12 of them. And one thing that I understand is that we'll
13 still have significant open areas for running dogs and
14 things.

15 Also, I do have some reservations about the
16 development, which I have discussed in other preliminary
17 meetings, but basically I do support the development.
18 And I would say that we have had meetings with the
19 owner -- our board of directors; and we have found that
20 he has basically been true to his record. And I know it
21 sounds naive, but I would just go along with a lot of
22 the things that are in the EIR because of that.

23 And, anyway, I think it has the potential to
24 become a new landmark for San Francisco on the -- out in
25 the southwest there, which has been basically without

TR.13.1

TR.13.1
con't

1 any kind of landmark like the downtown area, which is
2 what everyone thinks of as San Francisco. But it can be
3 a landmark for the nation as far as green living and as
4 far as energy -- new kind of energy use. I think it
5 would be a very good, very positive thing for San
6 Francisco and even an example for the nation.

7 Thank you.

8 PRESIDENT MIGUEL: Thank you.

9 Daniel Phillips.

10 DANIEL PHILLIPS: My name is Daniel Phillips,
11 P-h-i-l-l-i-p-s. I live at 405 Serrano Drive in
12 Parkmerced in San Francisco.

13 I am currently president of the board of
14 directors of the Parkmerced Residents Organization.
15 While the organization's official substance is still to
16 oppose Parkmerced Vision, I question the research being
17 done by the board members. I took three copies of the
18 draft EIR to our most recent board meeting, May 22nd, in
19 2010. And not one voting member accepted a copy to
20 study. It is beyond my comprehension that any
21 uninformed decision on the draft DEIR can be made.

22 When I first moved here in April of 1987, I
23 was struck by the cookie-cutter, utilitarian look of the
24 place. But when I began to walk through the original
25 150 acres, I discovered how there was great variety in

TR.14.1

1 the trim and doorways of Parkmerced. The interior
2 courtyards varied from magnificent areas with
3 curvilinear patios to drab, unimaginative places.
4 However, I can no longer visit those places. They are
5 not ADA accessible. And even in 1987 they seemed hidden
6 and private.

7 I believe we must go on -- we must go beyond
8 the emotional and nostalgic response and look at hard
9 facts. One of the greatest complaints by non-tower
10 residents concerns townhouse conditions. Some residents
11 have hired experts to inspect their homes. The solution
12 consistently seems to be rebuild the unit. This weakens
13 any argument for non-development.

14 The actions of a few militants are
15 embarrassing. I am sure you have all received rational
16 communications, but the current comfort zone can and
17 should be improved. The overall benefits of
18 Parkmerced's vision plan outweighs weak and uninformed
19 arguments. The eventual savings in resources alone call
20 for redevelopment. With Parkmerced Vision, we will have
21 a brighter future. Thank you.

22 PRESIDENT MIGUEL: Thank you.

23 Jeremy Setzer. Joel Koppel. Maria Elena
24 Guerrero Engber.

25 JEREMY SETZER: My name is Jeremy Setzer. My

TR.14.1
con't

1 last name is spelled S-e-t-z-e-r. I've been a resident
2 in Parkmerced for ten years. I just want to say that is
3 it really necessary to destroy all the greenery and all
4 the space in favor of more buildings of high occupancy,
5 increasing the density of the area which will rival
6 almost any city in the world except Hong Kong when these
7 large highrises are built? And, also, congestion and
8 density will increase. There are already problems with
9 19th Avenue and adjoining streets. And it will only
10 increase with increased construction.

TR.15.1

TR.15.2

11 Thank you.

12 JOEL KOPPEL: Good evening, Commissioners,
13 President Miguel. Joel Koppel. Can you please send my
14 transcript to 328 Garces? My mother resides there. She
15 works Tuesday and Thursday nights. She'd be here.
16 Hopefully, she'll be retiring after the end of the year.
17 So we'll see you down the road.

18 But I have nothing but good things to say a
19 bout Parkmerced and Stellar Management. I had the
20 privilege of growing up there in a three-bedroom
21 townhouse with a backyard on a dental hygienist's and a
22 teacher's salary. Back then the place was honestly a
23 little dismal; and I've seen nothing but improvements
24 ever since -- external improvement. Window
25 replacements, roof replacements. Honestly, more

1 construction and maintenance than most people would
2 like. But that's good for me to see, speaking from a
3 electrical construction industry. I can say for a fact
4 Stellar has been very responsible in performing
5 electrical and fire alarm upgrades. But at the same
6 time, like people have mentioned, you get to a point
7 where maintenance is just repairing what should be
8 played. Honestly, this property has such a large
9 footprint that the possibility for creating clean energy
10 and using it to better the city of San Francisco and all
11 is a great possibility.

12 So I'm here as San Francisco resident and as a
13 construction worker to speak in favor of adopting the
14 DEIR and looking forward to building a new Parkmerced.

15 Thank you.

16 PRESIDENT MIGUEL: Thank you.

17 MARIA ELENA GUERRERO ENGBER: Good evening,
18 Commissioners. My name is Maria Elena Guerrero Engber,
19 spelled G-u-e-r-r-e-r-o, E-n-g-b-e-r. I live at 310
20 Arballo Drive, Apartment 11-D. I am here to express to
21 you my opposition to the city of San Francisco Planning
22 Department draft environmental impact report for
23 Parkmerced project, 3711 19th Avenue.

24 My reasons to oppose the Parkmerced project as
25 presented by the sponsor are so many that I will only be

TR.16.1

1 able to mention a few here. My family and I have
2 occupied a Parkmerced home for the last 20 years. My
3 mother and I have resided in the same unit in Building
4 40 for the last 17 years, since 1993.

5 This environmental impact report has not
6 stressed enough the effect that this project, if
7 approved, will have on the current over 7,260 Parkmerced
8 residents' health and quality of life. Under this EIR
9 alternative the affect on trees will also be
10 devastating, as hundreds of trees will have to be cut
11 and the bird population nesting on trees will be
12 removed. I strongly believe that not one tree should be
13 cut or relocated. Not one bird should be displaced by
14 the destruction of their habitat.

15 The only acceptable alternative for me on this
16 EIR is that no possible alternative, leaving Parkmerced
17 as it is now, without any changes or construction until
18 they declare it a landmark historical site.

19 According to the draft EIR -- and I quote --
20 The impact on historic architectural resources,
21 transportation, circulation, noise, and air quality will
22 be significant and unavoidable. The impact on wind will
23 be potentially significant and unavoidable.

24 On Volume 1, Chapter 5, page DG-24, of the
25 Parkmerced EIR, I quote, Impact AQ-3, Construction of

TR.17.1

TR.17.2

TR.17.3

TR.17.4

1 proposed project could expose persons to substantial
2 levels of toxic air contaminants, which may lead to
3 adverse health defect, significant and unavoidable
4 criteria. GBGD.

5 I did not see mention on the EIR how the cost
6 of the asbestos removal on 1528 units that if
7 demolished, even on four phases, is going to be dealt
8 with by the city and by the present or future owners of
9 Parkmerced. What are the preventive measures that will
10 be taken to avoid thousands of old and new residents to
11 get lung cancer caused by prolonged asbestos exposure?
12 I am convinced that if this project is approved, it will
13 cause me and my family to get sick by the pollution and
14 air contamination produced by constant demolition and
15 construction around my home for years to come. Even if
16 the 3,221 --

17 Thank you.

18 PRESIDENT MIGUEL: Thank you.

19 Kevin McDonough. Dennis Norrington. Mitchell
20 Omerberg.

21 DENNIS NORRINGTON: Good evening. My name is
22 Dennis Norrington. I am the longest-term resident in
23 Parkmerced, having resided there since 1946 and at my
24 current address since 1957.

25 My speech first of all -- statement -- is

TR.17.4
con't

TR.18.1

1 specifically to the plan -- part of the plan regarding
2 turning Block No. 4, where I live, into a shopping
3 center. I think this is absurd. My residency there --
4 I've been familiar with the whole area. There is within
5 a mile-and-a-half distance of Block 4, seven major
6 shopping centers already. This includes the nearby
7 two-block-away shopping center on Cambon Drive, which
8 Parkmerced is currently -- which the owners currently in
9 the process of renovating and reviving. In addition,
10 you have the shops and malls at nearby San Francisco
11 State University; and, of course, the large and
12 extensive and famous Stonestown Galleria, which is less
13 than a half-mile away on Buckingham Way, Winston Drive,
14 and 19th Avenue. There's also an extensive shopping
15 center called Lakeside on Ocean Avenue between Junipero
16 Serra and 19th Avenue. The West Portal shopping center
17 is also not far away. That's four blocks long on West
18 Portal Avenue and contains many shops. In addition,
19 recently the Lakeshore Shopping Center on Sloat
20 Boulevard has been enlarged and expanded. There is
21 currently a very large and remodeled Lucky supermarket
22 as well as numerous other shops.

23 And, finally, I would like to state that I
24 work for San Francisco Chronicle in the morning in their
25 home delivery section as an assistant supervisor for the

TR.18.1
con't

1 Daly City area. The Westlake Shopping Center, which is
2 also nearby, has just completed a huge
3 multi-million-dollar expansion on John Daly Boulevard
4 and Lake Merced Boulevard, featuring 2 six-story
5 garages.

6 So there is -- so the idea that a shopping
7 center is needed, which would be centered on my block,
8 is absurd. Economically it would be redundant and there
9 would be very -- it would be -- the potential for the
10 survival of such a shopping center -- economic viability
11 would be negative.

TR.18.1
con't

12 In addition, I should say that I was a member
13 of -- former member of Parkmerced Residents
14 Organization, having served on its board of directors.
15 And I strongly support all of the statements in
16 opposition to this plan, especially those made by Ms.
17 Lentz, Mr. Lagos, and Mr. Goodman.

TR.18.2

18 Finally, I want to say that with regard to
19 this specific block I live on, there are many other
20 long-term residents whose displacement would also pose
21 severe problems to them.

TR.18.3

22 And, finally, with regard to the other aspect
23 of this plan, the construction of the replacement of
24 garden apartments with additional high-rise towers, I
25 would oppose this because, first of all, the danger of

TR.18.4

1 earthquake damage is very severe. I was in Parkmerced
2 when the Loma Prieta quake took place in 1989. Most of
3 the apartments, especially the towers, were severely
4 damaged. Had the quake lasted ten or fifteen seconds
5 more, some of these towers might very well have come
6 down.

7 And it's also important to point out that
8 these high-rise towers are the only high-rise buildings
9 in western San Francisco. There's a reason for that,
10 because we're very close to the San Andreas Fault,
11 which, of course, was the center of the '06 earthquake.
12 And the fact that the towers were damaged in the Loma
13 Prieta quake, which was not centered on the San Andreas,
14 is something that should be taken into consideration as
15 well.

16 Thank you.

17 PRESIDENT MIGUEL: Thank you.

18 KEVIN MCDONOUGH: Good evening, Commissioners.

19 My name is Kevin McDonough, M-c-D-o-n-o-u-g-h. I live
20 at 240 San Leandro in Balboa Terrace. And I am here to
21 speak in support of the project. I'm also -- I'm a past
22 president of Balboa Terrace, most recently for three
23 years.

24 So I want to make a comment about the
25 ownership group. They've done a lot of outreach to the

TR.18.4
con't

1 entire community. They came to -- they offered to give
2 presentations to our board meetings. We only have a few
3 people at our meetings, but we ended up going to the
4 West of Twin Peaks Council meeting.

5 So just a few things. I've looked at the
6 draft EIR and I do believe that it addresses the major
7 issues -- transportation -- the ingress, egress -- by
8 creating more things going out. The design of it, I
9 think, is good. The elevations. And then you look at
10 the towers. Of course -- and, you know, low-density
11 housing is probably good in San Ramon, but in San
12 Francisco, where we have to grow in the future, we have
13 to start building up.

14 My -- just a commentary on the Parkmerced
15 ownership group -- my wife worked out there in the '80s
16 as a leasing agent. And I think anybody who was out
17 there ten or fifteen years ago and has seen it now
18 realizes how much work this group has done for this
19 project out there.

20 So just want to say I think the EIR is well
21 thought-out. I think that the plan that the ownership
22 has in place that protects existing tenants, the removal
23 of low-density housing in the urban environment, the
24 commercial and the retail. Although there are a lot of
25 retail and commercial in the area, those are all --

TR.19.1

1 anybody who's gone there on the weekends knows those are
2 jam-packed. So if you can create a retail space within
3 that village, it will get people out of their cars and
4 get them moving around. And i believe it's a sensible
5 approach to growth with the gradual addition of units
6 over the next couple of decades.

TR.19.1
con't

7 So I urge you to move forward on that. Thank
8 you very much.

9 PRESIDENT MIGUEL: Thank you.

10 MITCHELL OMERBERG: Good evening,
11 Commissioners. My name is Mitchell Omerberg. That's
12 O-m-e-r-b-e-r-g. I'm representing Affordable Housing
13 Alliance, one of San Francisco's largest and longest
14 operating renters' rights organizations. My mailing
15 address, if you want it, is 71 Norwich Street, San
16 Francisco, 94110.

17 We're talking about demolishing over 1,500
18 affordable units with rent control and eviction
19 protection; and these units are basically irreplaceable.
20 They're irreplaceable for two reasons.

TR.20.1

21 No. 1, they were built with 1940s' and 1950s'
22 dollars being spent on 1920s' and 1950s' construction
23 costs. With all due respect, we cannot touch that
24 today.

25 The second reason is that these are

TR.20.2

1 rent-controlled, as I said, and eviction-protected units
2 and that are irreplaceable, because the Costa-Hawkins
3 Bill, which is part of our state law, says you cannot
4 control the rents on new construction. The promise that
5 apparently the landlord is making to some of the tenants
6 that they will live in newly constructed units with rent
7 control and eviction protection is a false promise. It
8 is unenforceable. We cannot control those units unless
9 we the city subsidized these units. You're all pretty
10 familiar, probably, with the Palmer decision on the
11 subject of inclusionary zoning in the last few months on
12 this topic.

TR.20.2
con't

13 There's another case that you should be aware
14 of that just came out in the last week, Embassy LLC
15 versus Santa Monica, which is on the topic of density
16 bonuses. Both these cases make it abundantly clear, as
17 the law states, that you cannot control the rents on
18 newly constructed units unless you subsidize them with
19 a, quote, direct financial contribution. I don't know
20 if the Mayor's Office of Housing is planning on putting
21 money on this project. I don't think so.

TR.20.3

22 If someone came to us proposing a new project
23 of 1,500 rent-controlled and eviction-protected
24 affordable units -- one-bedrooms, two-bedroom units,
25 some of them suitable for families -- we'd all be

TR.20.3
con't

1 drooling over it. And yet here we're talking about
2 demolishing 1,500 rent-controlled eviction-protected
3 units. Throwing away those units with the rent control
4 and eviction protection, with the material that went
5 into them, with the work that went into them, with the
6 money that went into them, is not green. Some would say
7 it's crazy. We must all agree that it is a significant
8 impact and it is not being addressed in any fashion
9 here.

10 So sorry for my grim tone, but I think it's a
11 grim situation. Thank you.

12 PRESIDENT MIGUEL: Thank you.

13 Michelle Pappas, Terrance Faulkner, Kate
14 Lefkowitz.

15 MICHAEL PAPPAS: Michael Pappas. It's
16 P-a-p-p-a-s. And I'm a resident of the city and county
17 of San Francisco. I live and work in the Presidio, but
18 for three years I pastored a congregation on Brotherhood
19 Way. And I'm the executive director of the San
20 Francisco Interfaith Council.

21 I've had the chance to review the draft EIR
22 and thankful to stand here in support of it. In the
23 1960s, under the leadership of former Mayor George
24 Christopher, a great interfaith experiment happened on
25 Brotherhood Way. And the result was seven houses of

TR.21.1

1 worship and educational institutions popped up there.
2 And alongside were our neighbors, Parkmerced; and they
3 were and they continue to be neighbors. I have
4 firsthand experience working directly with Parkmerced.
5 They were there for the 9/11 memorial. They were there
6 for the 20th anniversary observance and memorial of the
7 Loma Prieta earthquake, which we cosponsored a hunger
8 walk around Lake Merced. And they are partners in the
9 community agencies responding to the disaster program of
10 faith communities along Brotherhood Way.

TR.21.1
con't

11 In terms of environmental impact study, these
12 houses of worship will be a spiritual home to the new
13 residents and potential places for those residents to
14 send their children to school.

15 I think that the work that Parkmerced is doing
16 and continues to do to better the community is a
17 positive initiative. So I urge the members of the
18 Commission to supported this environmental impact [sic].

19 PRESIDENT MIGUEL: Thank you.

20 TERRANCE FAULKNER: Hi. My name is
21 Dr. Terrance Faulkner, JD, former Ronald Reagan
22 appointee to the federal executive awards committee and
23 also former state secretary of the California Republican
24 Chairman's Association. My address is 106 Crespi Drive,
25 San Francisco, ZIP code 94132.

1 Here's a couple of extracts from my letter to
2 Bill Wycko, your environmental officer. The EIR for the
3 Parkmerced project raises a host of issues:

4 A, respective incapacity to financially
5 perform appears to be the first problem of the
6 Parkmerced management in dealing with economic proposals
7 contained in this EIR. Based on the public statements
8 of Parkmerced management, as recently stated in the San
9 Francisco Chronicle and many other media publications,
10 there appears to be considerable doubt as to whether
11 Parkmerced management will be able to raise the needed
12 \$500 million, more or less, to avoid going into mortgage
13 and/or deed of trust default in October of 2010.

TR.22.1

14 B, should Parkmerced go into financial
15 default, a foreclosure sale of Parkmerced to a new
16 business entity is highly likely. A similar result is
17 also possible by private sale to a new business entity
18 before the October 2010 financial failure.

19 C, what a new business entity might do with
20 Parkmerced is very uncertain. The San Francisco
21 Planning Department would be well advised to postpone
22 any action on this highly questionable current EIR until
23 at least December of 2010 or a later date.

24 D, on the general merits of the EIR, assuming
25 Parkmerced management were unexpectedly in a financial

TR.22.2

1 position to act upon it, the proposals of the Parkmerced
2 management have virtually no public support among the
3 residents of Parkmerced nor the surrounding community.
4 The many public presentations of the current Parkmerced
5 management regarding their so-called vision for a new
6 Parkmerced have been widely questioned and rejected at
7 community meetings. To put the matter bluntly, the
8 so-called Parkmerced vision has no popular support
9 anywhere among the local residents or voters.

10 E, the EIR represents an extreme and unpopular
11 set of rebuilding plans by Parkmerced management,
12 proposed in an attempt to attract more funds for the
13 financially troubled Parkmerced.

14 F, speaking as a long-time incumbent county
15 central committeeman who has served in San Francisco
16 elected public office since 1974, Parkmerced management
17 EIR proposals would almost certainly be rejected by a
18 wide margin of San Francisco voters if it were ever to
19 go on a local election ballot.

20 Thank you. I'd like to turn this in to the
21 Secretary.

22 PRESIDENT MIGUEL: Just leave it right there.
23 Thank you.

24 KATE LEFKOWITZ: Good evening, Commissioners.
25 My name is Kate Lefkowitz and I'm the program manager

TR.22.2
con't

1 for the San Francisco Housing Action Coalition. Thank
2 you for the opportunity to speak today.

3 I'm here to highlight the adequacy of
4 Parkmerced's draft EIR in terms of addressing pertinent
5 environmental issues within the project site and
6 surrounding community. The Parkmerced draft EIR is both
7 balanced and thorough. The present land use of
8 Parkmerced harkens back to a time when water
9 conservation was not a priority and where cars dominated
10 the land.

11 We are pleased to see that DEIR proposes to
12 increase the intensity of the land use as well as the
13 importance of transit in a relatively low-density area
14 of the city.

15 The proposed project would protect existing
16 residents and maintain their rent control.

17 There will also be onsite inclusionary
18 housing, an important SFHAC goal. It is rare that we
19 see projects this well designed on San Francisco's west
20 side. And we strongly encourage density equity in this
21 part of the city.

22 The Parkmerced project proposes intensive
23 investments in transit and infrastructure that will
24 serve both residents and the surrounding community.
25 Specific transit improvements outlined in the draft EIR,

TR.23.1
con't

1 such as the extension of the M Oceanview line into the
2 project site, promote greater connectivity from
3 Parkmerced into the rest of the city. It also pushes
4 strategies designed to discourage the overall usage of
5 private automobiles and prioritizes walking and cycling
6 for internal trips.

7 In addition, all the homes within the
8 community are within walking distance of transit stops
9 with access to neighborhood-serving retail and 68 acres
10 of public open space, creating a liveable mixed-use
11 urban community. The SFHAC supports Parkmerced's
12 commitment to increased transit orientation and
13 innovative focus on decreasing development's carbon
14 footprint. The proposal to create a net-zero
15 energy/net-zero water project is the first we have seen
16 and is an excellent indicator of the path that our city
17 needs to follow. The enormous benefit this project
18 brings in both transit infrastructure, water
19 conservation, and energy efficiency are made possible by
20 the ambitious scope and scale of the investment. It's
21 rare that we see opportunities like this at one place
22 and one time.

23 On behalf of SFHAC, I strongly urge you to
24 support this deserving project. Thank you.

25 PRESIDENT MIGUEL: Thank you. Dean Preston.

TR.23.1
con't

1 Inga Horten, Mary Ann Miller.

2 DEAN PRESTON: Good evening, Commissioners.
3 Dean Preston, executive director of Tenants Together,
4 which is California's statewide organization for
5 renters' rights.

6 And we are deeply concerned about the
7 demolition of over 1,500 rent-controlled units. As
8 Mitchell Omerberg pointed out, these units cannot be
9 replaced with rent-controlled units under the California
10 state law, the Costa-Hawkins Rental Housing Act, which
11 you're all familiar. The landlord-developer promises
12 that existing tenants will be moved to new
13 rent-controlled units and that demolished units will be
14 replaced with new, affordable rental units.

15 There's a major problem that's not addressed
16 in this draft EIR, which is the enforceability of those
17 promises. Where is that discussed? It needs to be
18 addressed.

19 And the problem is there are major questions
20 about the enforceability, in light of the current
21 financial situation of the developer and in light of
22 recent case law addressing these issues.

23 As a practical matter, it's unclear that these
24 units will ever be built. This is a landlord in
25 default. This is a landlord that has lost their

TR.24.1

TR.24.2

1 properties in foreclosure in New York City. This is --
2 I can't believe we're even considering this. This would
3 be like a tenant asking their landlord if they could
4 remodel their unit when they hadn't paid rent for a
5 year. The landlord would laugh at him. Are we
6 seriously considering allowing them to move forward
7 under these circumstances? I hope not.

TR.24.2
con't

8 Regardless of the intentions of the current
9 owner, there is a serious likelihood that these
10 properties will end up in other hands -- perhaps in six
11 months, perhaps in a year, perhaps in two years. And if
12 the new owners will either not move forward with
13 replacement housing or seek to renege on promises that
14 have been made.

15 The recent court decisions -- as a statewide
16 organization, we pay close attention to court cases
17 around the state. Three situations in Southern
18 California in Los Angeles that warrant your attention.
19 Mitchell Omerberg referred to two of them. As you know,
20 the Palmer decision specifically invalidated the
21 requirement of Los Angeles law that new rent replacement
22 housing units that replaced rent-controlled units, that
23 those units have rent restrictions. It was invalidated.
24 Didn't matter that the city required it. Just this week
25 in the Embassy case -- Embassy versus City of Santa

TR.24.3

1 Monica -- the court of appeal allowed a landlord to
 2 violate its express agreement not to invoke the Ellis
 3 Act and evict tenants. This was in a settlement
 4 agreement with the city. They promised not to do this.
 5 The courts threw it out and said their right to invoke
 6 the Ellis Act was a nonwaivable right.

TR.24.3
 con't

7 We need to look at what is the enforceability
 8 of these commitments. Similarly, the --

9 I'll submit additional comments. Thank you
 10 very much.

11 INGA HORTON: Good evening. My name is Inga
 12 Horton, H-o-r-t-o-n. And I am on the board of directors
 13 of the Sunset Parkside Education and Action Committee.
 14 We are a neighborhood organization which is a neighbor
 15 more or less to Parkmerced. And we are concerned about
 16 several of the issues.

17 We are very concerned about the transportation
 18 generated by an additional 5,000 dwelling units, or 10

TR.25.1

19 to 20,000 additional residents. Although it is
 20 temporary and may be listed this summer, the closure of
 21 the southern part of the Great Highway west of the San
 22 Francisco Zoo, residents are already experiencing
 23 significant increase of trips on Sloat and Sunset
 24 Boulevard, the Great Highway, and 19th Avenue.

TR.25.2

25 The transportation study indicates that the

TR.25.3

1 main arteries -- 19th Avenue and Parkmerced Boulevard --
2 will be impacted at Level E and Level F due to the
3 population increase on the Parkmerced project.

TR.25.3
con't

4 We are concerned that we cannot reach the
5 airport in a decent time anymore, that we cannot go down
6 the Peninsula. And we also feel that the -- we are not
7 quite sure how much the cumulative impact study has been
8 considered, but that would really impact us.

TR.25.4

TR.25.5

9 Secondly, we are also concerned -- well, while
10 the proposed redevelopment of Parkmerced offers many
11 welcome sustainable features, the demolition of more
12 than 1,500 affordable rental units is not green nor
13 fiscally wise.

TR.25.6

14 The draft environmental impact report lacks an
15 assessment of socio-economic impacts of the demolition
16 of affordable and family-oriented housing units and
17 their phased replacement with market-rate housing in
18 mid- and high-rise buildings. We request the
19 preparation of a socio-economic analysis as an addendum
20 to the EIR.

TR.25.7

21 We will have more comments. We will have a
22 meeting on Monday with the general membership and then
23 turn in our written comments. Thank you.

24 PRESIDENT MIGUEL: Thank you.

25 MARY ANN MILLER: Mary Ann Miller,

1 M-i-l-l-e-r, 1239 42nd Avenue. That's in the western
2 part of the city, but it is not Parkmerced. However, as
3 a former member of the Planning Department and as a
4 resident of the western part of the city, I always want
5 to sort of give a fair shake to every large new
6 development that we have, since there are so few; and
7 since, as a member of the board of San Francisco
8 Tomorrow, we want to promote new housing where it's
9 appropriate. We want to promote, as well, historic
10 preservation. And we want to make sure that our EIRs
11 are well founded.

12 This one is enormous and it's very glossy and
13 it's very beautiful, but it is very hard to analyze.
14 And I've come to my own idea of this, that there really
15 is a need to take, not just each of the CEQA-mandated
16 impact areas, like land use or transportation, but to
17 take a project that's as large as this and divide it
18 into its phases. And for each of the phases do the land
19 use issues, the socio-economic issues, the
20 transportation issues, the hydrology -- whatever.

21 And if only this EIR, which I think is trying
22 to be a good EIR -- it's really comprehensive. But in
23 trying to read it over two days, I'm asking myself,
24 couldn't we take each of those four or so phases,
25 analyze the impacts, or just organize it differently?

TR.26.1

TR.26.1
con't

1 We have the computers; and consultants could organize
2 those impacts under the phases.

3 So this could either be done as
4 alternatives -- I agree with the people who say there
5 should be more alternatives. And I am sorry that there
6 was one lost that was an historic preservation
7 alternative apparently. I do think C is good, but I
8 wonder what G-a looked like, as Mr. Goodman questioned.

TR.26.2

9 So is there a way to add more alternatives or,
10 conversely, analyze per phase what the impacts would be.
11 My idea is that that would help you -- you're the
12 decision-makers -- it would help us in the public. We
13 wouldn't be all opposed to it or all for it. You know,
14 the people who say they're for and say they've read it,
15 they can't be truthful, because they can't read it and
16 also be for it. You have to -- you know -- kind of
17 hedge your critique.

TR.26.3

18 Also, under the appendix that's part of the
19 EIR, I would like to see removed all the self-serving
20 promotional, super hypercolored, super-califragilistic
21 graphics. Please get them out of there. They're
22 prejudicial.

23 Thank you.

24 PRESIDENT MIGUEL: Thank you.

25 Jeanne D'Arcy. Jeanne Scott.

1 JEANNE D'ARCY: Good evening, Commissioners.

2 My name is Jeanne D'Arcy. That's spelled D, apostrophe,
3 capital a-r-c-y. I'm an 18-year resident of Parkmerced.
4 I'm a native San Franciscan, third generation. I raised
5 three daughters in Parkmerced.

6 And I have experienced several different
7 managers and owners as I've lived there. These by far
8 are the best managers that I've experienced. While
9 there are still problems with the units, they are
10 responding to those problems. I am happy with the
11 management's outreach to the residents and their
12 cooperation with the stakeholders and their
13 responsibility in response to their community concerns.

14 I support the Parkmerced vision and I look
15 forward to working with the management to get it
16 approved.

17 Some of the reasons for my support include
18 that the existing garden apartments, of which I am a
19 resident, have inadequate plumbing and electrical
20 service. They're at the stage right now where they need
21 to be rebuilt, not just repaired. Today there's no
22 space for residents to meet with friends and neighbors.
23 There are many open grass areas, but they're not
24 appropriate for sitting and meeting and conversing. We
25 need coffee shops, restaurants, neighborhood parks,

TR.27.1

1 activity centers, and other community-gathering spaces.
2 This is especially important to attract more families to
3 our city.

4 The existing Parkmerced buildings are
5 environmentally wasteful of water and other resources.
6 The new management is committed to building new
7 sustainable designs and is supportive of regenerative
8 living. Management has already formed a sustainability
9 committee that meets on a regular basis to define and
10 implement sustainable initiatives. I am a member of
11 that committee and I am pleased with the direction that
12 Parkmerced is moving as a member of that committee.

TR.27.1
con't

13 I have not read thoroughly the report, but I
14 have reviewed it. I have been able to ask questions of
15 the management and received answers. I wasn't trustful
16 of them in the beginning because of the previous
17 managers we had. I am very trustful of them now,
18 because they've been honest.

19 As a native San Franciscan and as a teacher
20 and administrator for the San Francisco Unified School
21 District and as a parent, I'm excited about the
22 potential for my neighborhood for setting an example for
23 the rest of the nation with this update of my
24 neighborhood.

25 Thank you.

1 PRESIDENT MIGUEL: Thank you.

2 JEANNE SCOTT: Hello. My name is Jeannie
3 Scott. I am a resident of Parkmerced. I live in one of
4 the garden apartments. I've lived there about six years
5 and I'm very strongly in favor of the plans that -- the
6 Parkmerced Vision, because what -- I'm really looking
7 forward to living in a more sustainable environment.
8 The garden apartment that I have I have to watch for
9 roof leaks and then I report them. And, again, I have
10 plumbing and water issues. And so I'm really looking
11 forward to living in an energy-efficient, comfortable
12 apartment.

13 I'm also looking forward to walks among native
14 plants and trees which would attract more native birds,
15 butterflies, bees -- there's hardly any bees out there.
16 So I'm looking forward to the future there. I really,
17 really wish it was now, because I -- in fact, if this
18 had been -- if this Parkmerced had been, instead of 30
19 years from now, now, I would be running to this place to
20 rent.

21 And thank you very much.

22 PRESIDENT MIGUEL: Thank you.

23 Those are all the speaker cards I have. Is
24 there additional public comment?

25 MARIA-ELENA MESTAYER: Hi. My name is

TR.28.1

1 Maria-Elena Mestayer, no relationship to the other
2 Maria-Elena who spoke. I've been living in Parkmerced
3 for seven years. I moved here from actually New York
4 City.

5 And I looked at the -- I don't know if you
6 received the environmental reports, how massive they
7 are. And I have a joke about management. I live with
8 my partner in the same house and we both got a copy and
9 I think to myself, This is Stellar Management, who
10 according to Robert Selna of the San Francisco
11 Chronicle, is a company verging on default; and it
12 imagines that it's going to reconstruct its debt and
13 then spend billions of dollars in the future. That is
14 what the owner said. According to real estate finance
15 experts, the middle man, which is called a special
16 servicer, is required to protect investors who are owed
17 mortgage payouts -- not the owners of the complex, its
18 tenants, or the city -- leaving the fate of the
19 3,321-unit Parkmerced very much in question.

20 And another professor from Pennsylvania State
21 University, Brent Ambrose, this is his quote: Whether
22 they work out a deal to extend the loan, manage the
23 property themselves, or recommend foreclosure is very
24 specific to the property. They have been known in New
25 York City to choose foreclosure.

TR.29.1

TR.29.1
con't

1 I'm not sure -- I looked up in Google Stellar
2 Management and looked at all the different properties
3 that they bought in the past decade. Almost every
4 single one of those properties in New York City is in
5 foreclosure.

6 So I'm just asking you -- I agree with
7 everything that's been said. I oppose the Parkmerced
8 structure, not because the whole construction, not
9 because I live there, but because I'm a resident of the
10 city and county of San Francisco. And I am a voter.
11 And looking at that what somebody said
12 super-califragilistic amazing two books that I can
13 actually sit my nephew on and -- like in a chair. I
14 just want you to take that into account. Take into
15 account that there are people that live there.

TR.29.2

16 I'm a graduate from San Francisco State
17 University and maybe -- what I'm asking you to do is why
18 not just fix the problems of the units now and then
19 maybe take into consideration -- I think the two people
20 before me, the woman who spoke who used to be on the
21 Planning Commission, that she said if you presented it
22 in stages, because that I thought was a very good idea.
23 Because it's massive. It's huge. And it is a vision.
24 And I'm just asking you to take into account the people
25 who live there.

1 And one last thing I want to leave you with is
2 my 14-year-old nephew, who goes to SOTA, which is where
3 McAteer High School used to be, he came into my house
4 and saw the books, opened the books, and he said to me,
5 Are you kidding? They think that Muni, who is broke --
6 he's 14 years old -- who is broke and in the red, is
7 going to bring the M train all the way into the complex
8 and somehow people are just going to appear and ride
9 these Muni cars. Because he explained to me it took him
10 40 minutes to get from his school, McAteer, to
11 Parkmerced.

TR.29.3

12 So I'm just begging you, asking you to just
13 contemplate other -- other choices. Thank you.

14 PRESIDENT MIGUEL: Thank you.

15 JUDITH FLYNN: Good evening, Commissioners.
16 My name is Judith Flynn, F-l-y-n-n. And I am the
17 director of the Montessori Children's Center, which is
18 located in Parkmerced at 81 Bautista Circle. I've been
19 the director since 1976, so I have seen quite a
20 historical perspective of what's happened there. I'm
21 here neither to be pro or con about the particular EIR,
22 but to address a few issues that I felt, in my cursory
23 perusal. Because it is very lengthy, as people have
24 mentioned, there was no way to be very -- completely
25 specifically informed.

1 In the current Parkmerced project EIR, there
 2 is no mention of the existing preschool, Montessori
 3 Children's Center, at 80 Juan Bautista Circle. It is,
 4 therefore, unclear what Parkmerced intends to do with
 5 that building in this plan. The EIR does mention a new
 6 school to be build on Bucarelli Drive; and in many of
 7 the maps accompanying the EIR, the school building on
 8 Juan Bautista is notably absent. It, therefore, seems
 9 that, although it is not stated outright, the planned
 10 development will entail demolishing the school on Juan
 11 Bautista.

TR.30.1

12 This raises numerous questions.

13 Timeline. What is the timeline for the
 14 demolition of the school on Juan Bautista and the
 15 construction of the school on Bucarelli?

TR.30.2

16 Health and safety. What are the health risks
 17 associated with the demolition of the school? In
 18 particularly, what effect will demolition have on air
 19 quality? Has the impact of this been properly assessed,
 20 especially with respect to young children, families, and
 21 staff?

TR.30.3

22 What are the health risks of other nearby
 23 buildings being demolished while the school is still in
 24 operation? Have these health risks been accurately
 25 assessed, given that the children who attend the school

TR.30.4

1 are at higher risk for health complications from
2 degraded air quality?

TR.30.4
con't

3 Traffic. Will the new school be built before
4 the old one is demolished so that a local preschool will
5 be continuously present? If not, what impact will this
6 have on traffic and travel, particularly that of local
7 families?

TR.30.5

8 What impact will this have on the families and
9 staff of the existing school?

10 Has the rise in traffic along Bucarelli once
11 the new school is built been accounted for, considering
12 Bucarelli is a narrow street? Have there been
13 considerations and accommodations made for the heavy
14 traffic times of drop-off and pick-up?

TR.30.6

15 Will some form of on-site parking for the new
16 school be offered? If not, what will be the impact of
17 an increase in the number there?

TR.30.7

18 Green space. Also featured in the plan is the
19 transformation of the large green space of Juan Bautista
20 Circle into a commercial area. Not only will this be a
21 loss for all the residents, it will particularly affect
22 families, who use it for recreation. The loss of this
23 space seems at odds with the project's sustainability.

TR.30.8

24 And I just want to say that school was
25 purposely built for us only about six years ago, after

1 we located a space on Font Boulevard.

2 Thank you very much.

3 DAN WEAVER: Good evening, Commissioners. My
4 name is Dan Weaver, W-e-a-v-e-r. And I'm speaking today
5 as a resident of nearby community to Parkmerced, the
6 Oceanview/Merced Heights/Ingleside neighborhood. And
7 also bringing to the podium my experience as District 11
8 representative for the MTA CAC.

9 When Parkmerced planners have visited the OMI,
10 they have learned, I think, by their second visit if not
11 their first one, that we have a lot of issues with the
12 transportation improvement or transportation
13 effectiveness project, because it proposed to cut off
14 the M-Oceanview before it ever got to Oceanview. And
15 that was an issue in our neighborhood for a long time
16 and remains an issue. However, the next time the
17 planning team came to our OMI, neighbors in action
18 meeting, they added an alternative proposal that they
19 were considering and proposing, which was to actually
20 have two ends to the M streetcar line, one which would
21 continue to go through the Oceanview neighborhood and
22 the other one which would go to Daly City BART. And at
23 least on the plans they showed us, they indicated how
24 that would work. And I think that's a plan that we like
25 in the neighborhood. We think it would enhance

TR.31.1

TR.31.1
con't

1 transportation.

2 There's also an idea of putting crossings --
3 the streetcar crossings of 19th Avenue -- not at the
4 same level as the automobiles, but figure out about
5 another way to deal with it, most probably underground
6 in some way. And I think this is going to enhance the
7 entire transit picture on the southwestern part of the
8 city.

TR.31.2

9 Another aspect of this is that the M line that
10 goes off to Balboa BART through the Oceanview district
11 could go down Geneva Avenue and provide an alternative
12 to the Twin Peaks tunnel, which is at capacity, which is
13 another issue that the TEP has to deal with. So from a
14 transit perspective, it seems to me that this planning
15 group has done an effective job. And, also, from a
16 neighborhood outreach perspective, they've come and
17 talked to us about these issues and listened to the
18 feedback we've provided.

TR.31.3

19 Thank you.

20 PRESIDENT MIGUEL: Thank you.

21 NAN ROTH: My name is Nan Roth. I'm sorry,
22 but I just walked in the door. I don't quite know where
23 you all are.

24 So I tried to go through the EIR, at least
25 some parts of it, today on the Internet. I must say the

TR.32.1

TR.32.1
con't

1 system that they use for reading is just impossible,
2 absolutely impossible. I don't see why they can't just
3 make a normal copy available with regular page
4 numbering. Anyway, it just took me hours and hours and
5 hours that I wasted. I probably shouldn't have even
6 started trying.

7 I will try to concentrate my comments on the
8 historic resource issue here. I'm a graduate of
9 architecture school in the 1950s. I have a great love
10 of buildings of this sort. I think of two things. I
11 think of the Appleton Wolfard libraries because I've
12 been to a lot of hearings about that lately and how
13 we've developed so much compassion for that. And I hope
14 we've been able to approach evaluation of Parkmerced
15 with the same level of compassion. I think about
16 Eichler houses. My god, they've become treasures.
17 They're getting huge prices on the market. People have
18 learned to really appreciate elements of design and
19 community from that era that we see rapidly disappearing
20 today. I don't think that this EIR adequately addresses
21 that fact. This is another issue of demolition by
22 neglect.

TR.32.2

23 It's very easy to look at all of the negative
24 factors and people don't seem to be as willing as I
25 would like to see them in evaluating the more positive

1 elements. So I will cut my comments short at that.

2 I've been a resident of San Francisco for 50
3 years. We have many friends who lived in Parkmerced in
4 the early years of their marriages. I've made snowballs
5 out in Parkmerced. I can't remember if it was the fall
6 of '60, but I think it was the winter of 1962 when they
7 had a very heavy snowfall out there. I have a great
8 love for Parkmerced and I would hope that someone would
9 come along and appreciate the Thomas Church gardens. We
10 see very little left at this point. Nevertheless, if
11 they were restored, they're very easy to maintain. They
12 were always very sustainable gardens. That was one of
13 the nice things about them. It just saddens me to see
14 what has happened out there.

TR.32.3

15 Thank you. Bye-bye.

16 PRESIDENT MIGUEL: Thank you. Is there
17 additional public comment?

18 JOHN KIM: Hello. My name is John Kim, K-i-m.
19 I live in Parkmerced garden apartment for about 35
20 years. I started residency when my daughter attended
21 school. Now she is grown up and she has become a
22 veterinary medicine, very fine veterinary doctor.

23 Now, I drive around the city hundred times I
24 talk to my wife. What a beautiful place we live in. So
25 peaceful. So green. Green pastures. I can't see

TR.33.1

1 anywhere like this in San Francisco, not even San
2 Francisco. Now they're going to demolish this. I know
3 this great environment, if you look through the window
4 you can see the back pasture green. My daughter runs
5 out the window and talks to the next-door kids. And it
6 provide very healthy environment. So I'm sure this
7 Parkmerced apartment produced many, many intelligent,
8 healthy California San Franciscans. And they contribute
9 to this society because Parkmerced provided this nice,
10 beautiful apartment. My daughter now visits at least
11 once a week and brings her kids. I throw them in the
12 backyard. They run around. They love it so much. They
13 love it so much, they don't want to go home because this
14 is so good. Green pastures.

15 Now, they are going to demolish this green
16 pastures and replace it with concrete jungle. You know
17 how concrete jungle is? You open the door, you see dark
18 alleys. Now, I was driving through come to City Hall
19 all of a sudden this Bible hit me. Lord is my shepherd.
20 I shall not want. He will lead me to green pastures and
21 still waters. Now they will have left this green
22 pastures destroyed. Please, please, please leave this
23 green pastures and beautiful, beautiful place. Thank
24 you.

25 PRESIDENT MIGUEL: Thank you. Is there

TR.33.1
con't

1 additional public comment? If not, public comment is
2 closed.

3 Commissioner Olague.

4 COMMISSIONER OLAGUE: Well, i just wanted to
5 sort of echo some of the concerns that Ms. Miller
6 raised. And that's, sometimes when I read these
7 documents, I also am never sure whether --sometimes they
8 read as a -- as a -- not so much as an objective study
9 of CEQA impacts, but a little bit as a marketing
10 brochure on how you justify a development.

11 So I'm not looking to justify developments.
12 I'm trying to study impacts. And with this, I guess the
13 two main issues I wanted to raise or questions or
14 whatever was on page -- under plans and policies, San
15 Francisco plans and policies -- priority policies. It's
16 at 4.1. And in it it said that for purposes of this EIR
17 the proposed project was reviewed against the priority
18 policies and no inconsistencies were identified.

19 And as it relates to -- let's see -- the
20 priority principle of Prop M is what they're referring
21 to here that was passed by the voters in 1986. And one
22 of the priority principles is No. 3, preservation and
23 enhancement of affordable housing. But in this
24 document, there's really no analysis in my mind or any
25 adequate analysis of the impact -- or the impact that

TR.34.1

1 the loss of 1,500 is what I'm hearing -- 1,500 units of
2 rent-controlled units will have on the city based on
3 identified needs. So I would like to see more analysis
4 of that.

5 There's some verbiage here, but I don't think
6 that the analysis is adequate either. So that kind of
7 echoes what Mr. Preston said and Mr. Omerberg --
8 Mitchell -- I should know better. So I think that --
9 yeah, I would like to see a little bit more of that
10 there.

11 And then, also, the parking issue, of course.
12 This is being touted as a green development. And one of
13 the priority principles also reads, Discouragement of
14 commuter automobiles that impede Muni transit service or
15 that over-burden streets or neighborhood parking.

16 And then there's also the transit-first
17 policy, which is also sort of referenced here. And that
18 is in 1998 the SF voters amended the City Charter 16.102
19 to include a transit-first policy. The transit-first
20 policy is a set of principles that underscore the City's
21 commitment to prioritize travel by transit, bicycle, and
22 on foot over private automobile travel. These
23 principles are embodied in the policies and objectives
24 of the transportation element of the General Plan. All
25 City boards, commissions, and departments are required

TR.34.1
con't

TR.34.2

1 by law to implement transit-first principles in
2 conducting city affairs.

3 I don't believe that this adequately analyzes
4 how this does or doesn't relate to the fact that the
5 project is requesting a one-to-one parking for their
6 housing units. So I think I would like to see more
7 analysis of how that does or doesn't relate to our
8 transit-first policy.

9 PRESIDENT MIGUEL: Commissioner Antonini.

10 COMMISSIONER ANTONINI: Well, thank you.

11 I appreciate all the comments. And, of
12 course, you're all aware that the comment period
13 continues till June 28th of this month -- June 28th.

14 I think that we are -- today most of the
15 comments should center on the adequacy, the accuracy,
16 and the objective of the environmental impact report.
17 And while there were a lot of comments that were more on
18 the project itself, certainly if you can center your
19 comments on that part of it, that's what we're most
20 interested in hearing about at this point. And there
21 will be an opportunity for, as the project moves
22 forward, to comment also on the desirability of
23 undesirability of the project itself.

24 A couple things that I thought were very
25 interesting. And that was a comment that was made about

TR.34.2
con't

TR.35.1

1 the grade separation at 19th Avenue. And as most of you
2 are aware, if you read this, much of the Muni
3 improvements are to be funded by the project sponsor.
4 And while that might be out of the province of what
5 they're doing, I think that's an important thing to look
6 at. I believe it's analyzed to some degree there. But
7 clearly the idea is to have the Muni M-line already on
8 the west side of 19th before it enters at Holloway. But
9 then the existing strategy, which I believe is at the
10 street called Felix at the point of Junipero Serra and
11 19th, I think it would be very important that there be a
12 grade separation there so that Muni could move unimpeded
13 by the traffic, which is very heavy coming off of
14 Junipero Serra, 19th, and 280. And that's something
15 that certainly should be answered as part of the
16 comments and responses, I think.

TR.35.1
con't

17 And, of course, it also is mentioned and it is
18 also part of the analysis deals with the extension to
19 the Daly City BART, which I think is a very important.
20 Once again, it may be to some degree that the periphery
21 of this actual project, I think it certainly is very
22 important that as this analysis is done, that we also,
23 you know, make comments to everything that they should
24 look towards that.

TR.35.2

25 I thought the analysis was very extremely well

TR.35.3
↓

1 done in regards to -- I read the section on water. And,
2 of course, there was a huge part from SFPUC that dealt
3 with the water analysis. That was very well done as
4 well as the wind exposures, which are extremely
5 important. Being a resident of that part of San
6 Francisco, I can share with you, as you all know, how
7 important it is that when you do have sun that you can
8 maximize it. And you also have to have prevention from
9 the wind. Have a design so that the wind is buffeted in
10 a way that it allows a calming area. And certainly that
11 is well done in the plan; and the analysis does a good
12 job on that.

TR.35.3
con't

13 Also, it did a good job on traffic. And, of
14 course, we have to analyze this from the impact it has
15 on traffic, but not the preexisting traffic. But
16 certainly it has to be taken in that context.

17 Also, there were a lot of comments about
18 changes which are not -- certainly various
19 socio-economic changes are not necessarily -- are not
20 part of an EIR, but very, very valid and should be
21 expressed when the project itself comes forward. But
22 what would have to be done is the mitigation of the
23 project. So, for example, if you add another 3,000
24 residents, yes, it is appropriate to talk about the fact
25 that a mitigation would be a school that is proposed and

TR.35.4

1 other mitigating factors to attend to the needs of
2 additional children that might be there.

TR.35.4
con't

3 Let's see. And, also, alternatives can
4 address -- as we get to the project itself, we can talk
5 about design alternatives. And there are some who have
6 said, Well, we would prefer a different design. We like
7 townhouses. We like that design. And, certainly, that
8 could be -- that's straight from the EIR itself.
9 External analysis is being done for impact of increased
10 density, increased housing, but design is something that
11 will move forward as the project moves forward.

TR.35.5

12 And the other thing that was mentioned a lot
13 was the situation with rent-controlled units, which, is
14 not the province of the environmental impact report.
15 However, we have seen agreements between developers; and
16 they're part of the development agreement that it calls
17 for a provision for the maintenance of present tenants
18 will be returned to rent-controlled units. So that is
19 something that can be part of your agreement. But,
20 again, it's not environmental impact.

TR.35.6

21 And the only other thing I was going to say
22 was also is not is economic performance. That's been
23 mentioned. And while it's a consideration and a
24 concern, we have to remember that entitlement moves with
25 the project, not with the particular developer. So you

TR.35.7

1 pass an entitlement and you have certain provisions that
2 are a part of the development. And if that development
3 was sold to another developer, the same conditions
4 apply. The conditions don't go with the developer.
5 They go with the project. So while it certainly is
6 important to have solvency and I think it probably will
7 be case, but if there were a sale or something were to
8 happen, then what is approved will move forward. But I
9 think in what I've reviewed so far, seems to be
10 adequate, accurate, and objective.

TR.35.7
con't

11 I may have additional comments that I will
12 submit in writing before the end of the comment period.

13 PRESIDENT MIGUEL: Commissioner Sugaya.

14 COMMISSIONER SUGAYA: Yeah. I don't know
15 where to begin, actually.

16 Most of the comments received this evening
17 consider -- were concerning the project itself. And
18 it's always very difficult, I think, under CEQA -- I
19 don't think the public gets it and they don't understand
20 it. Its only the people who have dealt with CEQA -- the
21 land use lawyers, the ex-planners. They're very active
22 neighborhood people who understand the process and that
23 the process -- for example, last week on the Fairmont
24 Hotel, I know that there were tons of very specific,
25 targeted comment that people have now written about that

TR.36.1

1 particular environmental impact report. And there's a
2 difference between what is the project which has what
3 the environmental impact report is analyzing and the
4 comments that need to be made on this draft
5 environmental impact report.

6 So, for example, the last gentlemen, who I
7 appreciated, I thought he was great in what he said and
8 his passion for living at the development and his
9 comments about his children and now his grandchildren --
10 those were great. But, you know, in the EIR it's going
11 to note that and his comments have all been recorded.
12 We have a court reporter here and it's on tape. So
13 his -- all of his words will be recorded and it will be
14 in the transcript. But when the people who wrote the
15 EIR in the City take a look at what he said, all they're
16 going to say is, This is a nice comment and it's noted.
17 They're not going to go into at all kinds of things that
18 he was trying to tell us peripherally, because it's not
19 addressing specifically what's in the document.

20 That's where I think the public process for
21 the environmental document really breaks down, because
22 then it comes back to the people who really understand
23 it, like Ms. Miller and others, who was the planner --
24 ex-planner -- from the city, and comment about the
25 phasing. I thought was an interesting comment that we

TR.36.1
con't

1 have not done before. But those were comments that were
2 targeted directly at the document itself.

3 I'm just using this as an example of what's
4 happened every time we have a hearing on a DEIR.

5 So this is no -- this is nothing new. It
6 happened last week on the Fairmont. Like I said, a lot
7 of comments were made about the project itself. On the
8 Candlestick and Hunters Point project -- huge project
9 for redevelopment. We had the same kind of testimony.

10 So I'm not singling you out. It just has now
11 come to mind and I just want to get it off my chest
12 here. And I don't know what to do about it, except the
13 City has to do a better job of informing people, change
14 the purpose of the California Environmental Quality Act
15 is and how you can really use it to analyze and make
16 comments about the project through that process and
17 along those lines.

18 The mention of affordable housing and
19 rent-controlled housing. Ms. Olague -- Commissioner
20 Olague -- mentioned it, and there was testimony here. I
21 think the people who testified know how to construct
22 their criticism of the DEIR and how it has presented the
23 arguments -- how it has analyzed the affordable housing
24 issue. I've read it through the first time. And it
25 does mention that there are these units, et cetera, and

TR.36.1
con't

1 it does mention that the developer has promised to
2 provide same number of units and people will be able to
3 move into them for the same rent that they're paying
4 now, et cetera. But I think there are probably
5 improvements that could be made.

6 But you can't just say that I read it and this
7 is what it says and I think improvements are going to be
8 necessary here. There needs to be an improved
9 evaluation, because the person who is reviewing, that
10 has no idea what you mean by that, in essence, they're
11 going to say, Well, what do you mean by more analysis?
12 So the people who are going to be talking about
13 affordable housing in the written comments, hopefully,
14 will have to target it in such a way that it forces the
15 reviewers to take into consideration what it is that you
16 are really asking for.

17 So I'm trying to tell you how to construct
18 your arguments here, I guess. If you have problems with
19 transportation, don't just say that there's a problem
20 with the transportation analysis. You got to really
21 pinpoint what it is about the transportation analysis
22 that's the real problem, whether there are -- whether
23 you think the analysis of the intersections is no good.
24 You have to tell them why and why you think so.
25 Otherwise, they're just going to dismiss it all or just

TR.36.1
con't

1 refer back to the same paragraphs that you're already
2 saying are inadequate.

3 Anyway, that's my comments. I also think
4 that, given the nature of the project, it's quite
5 extensive. In some ways, you knows, in terms of acres,
6 it might not be as big as the Candlestick Point/Hunters
7 Point, but it does have its own unique, I think, more
8 involved issues in some ways, especially since there are
9 a whole lot -- this is a development that already has
10 people in it. Except for Alice Griffith housing,
11 Candlestick/Hunters Point has very -- has a limited, I
12 think, number of existing residents, far fewer than
13 here, I think. So that's a huge difference between the
14 two EIRs.

15 And, also, there are probably -- I don't want
16 to say that transportation is more complicated, but this
17 is in a much more urban situation than out there. And
18 for various reasons along those lines, I think people do
19 have difficulty kind of getting through this.

20 So I'd like to make a motion to extend the
21 comment period for two weeks.

22 COMMISSIONER OLAGUE: Second.

23 COMMISSION SECRETARY: So, Commissioner, you
24 want the comment period to be extended to July 12th,
25 close of business?

TR.36.1
con't

1 COMMISSIONER SUGAYA: Yes, that would be the
2 written comment period. So it doesn't affect our
3 hearing schedule or anything.

4 PRESIDENT MIGUEL: That doesn't affect us?

5 COMMISSION SECRETARY: No. That the comment
6 period -- the written comment period would be extended
7 for two weeks, till the close of business of Monday,
8 July 12th.

9 Commissioners, there's a motion for
10 continuance of the comment period --

11 COMMISSIONER ANTONINI: Before we vote, I had
12 a question. Do the other Commissioners want to comment
13 before we --

14 COMMISSION SECRETARY: You can comment on it.
15 There's a motion and a second.

16 COMMISSIONER OLAGUE: I have comments on the
17 EIR. I'd like to clarify my comments along the lines --
18 coincidentally, I thought, well, maybe I'm sort of being
19 vague, so I wanted the staff to have a clear
20 understanding of what I meant by my comments.

21 PRESIDENT MIGUEL: There are more comments --

22 COMMISSIONER OLAGUE: On the EIR.

23 COMMISSIONER ANTONINI: My clarification is I
24 didn't hear any request from the public as to the
25 extension as long -- I don't really see any harm as long

1 as we don't have any constraints with possible future
2 actions by the Board of Supervisors or others who may
3 have to be involved in the process, but I'm not hearing
4 none. I don't think that this would be a problem to
5 extend an additional two weeks.

6 COMMISSIONER SUGAYA: There was an e-mail
7 request, I believe, that was responded to by Planning
8 staff to -- and it was basically rejected at the staff
9 level -- that the 45-day period was adequate, in their
10 eyes.

11 COMMISSIONER ANTONINI: Could I ask for a
12 recommendation from staff on this extension?

13 MR. COOPER: Rick Cooper. I apologize. I was
14 in conversation. Could you repeat that question?

15 COMMISSIONER ANTONINI: My question was that
16 there's a motion before us to extend the comment period
17 for a couple of weeks. And I hadn't heard any
18 testimony. I'm not saying there wasn't a request. And
19 I guess staff had said they felt that the comment period
20 was adequate, which is -- do you have any comments on
21 the extension or your feelings in regards to our moving
22 forward? In other words, are there any kind of problems
23 with this extension in regards to whether legislative
24 actions that might be involved with the extension?

25 MR. COOPER: Well, as you've indicated, staff

1 believes that we've had an adequate -- we have an
2 adequate comment period. It's really purely the
3 Commission's discretion as to whether you want to extend
4 it. I couldn't really comment any further.

5 COMMISSIONER ANTONINI: Okay. Thank you.

6 COMMISSION SECRETARY: Commissioners, on the
7 motion for continuance of the comment period from the
8 current date of June 28th, close of business, to Monday,
9 July 12th, close of business.

10 Commissioner Antonini.

11 COMMISSIONER ANTONINI: Aye.

12 COMMISSION SECRETARY: Commissioner Moore.

13 COMMISSIONER MOORE: Aye.

14 COMMISSION SECRETARY: Commissioner Sugaya.

15 COMMISSIONER SUGAYA: Aye.

16 COMMISSION SECRETARY: Commissioner Olague.

17 COMMISSIONER OLAGUE: Aye.

18 COMMISSION SECRETARY: Commissioner Miguel.

19 PRESIDENT MIGUEL: Aye.

20 COMMISSION SECRETARY: Thank you,

21 Commissioners. The comment period -- the written
22 comment period is extended to close of business, Monday,
23 July 12th.

24 PRESIDENT MIGUEL: Commissioner Olague.

25 COMMISSIONER OLAGUE: Yeah.

1 I just want to say, briefly, that one thing I
2 just wanted to clarify for staff was, of course, this is
3 trying to sort of review against the priority policies
4 and sort of see if there's consistencies or
5 inconsistencies. And one of the lines, I guess, in it
6 to justify the inconsistency or that there were no
7 inconsistencies is that the new unit would be rented at
8 the same rent-controlled rate as the resident's existing
9 unit prior to demolition. So in a way they're still --
10 there's references here and some sentence says
11 rent-controlled units be rented to households of any
12 income level. I mean there's definitely reference to
13 rent-controlled units, but there's really no broader
14 discussion on how that relates to the housing element
15 and housing policies and housing inventories and some of
16 the needs that have been specified in those other policy
17 documents the City has. So I would just like to see
18 more just -- more thought given to just that impact that
19 a loss of this type of housing -- rent-controlled units,
20 not that just people currently living there will get --
21 will have the opportunity to have their rent-controlled
22 unit replaced. I want more of a sense of the long-term
23 impact of just that loss of that housing type, not just
24 to those individuals, but to the city as a whole in the
25 long term.

TR.34.3

1 And, Commissioner Sugaya, maybe brown bags or
2 something for the public that would educate people on
3 how to analyze a CEQA document would be something that
4 might be good, you know. A couple of lunch -- I know
5 not everyone can get out for lunch. And then maybe
6 online to have some kind of reference guide or something
7 that would give pointers to the public on what they
8 should be looking for when they're analyzing a CEQA
9 document so that when they come here, their comments
10 could be more direct or pointed. There might be things
11 we can do. We should discuss it at some point so that
12 these documents are more accessible or whatever to the
13 public and sometimes to us.

TR.34.4

14 Ms. Miller's comments on the phasing, I think,
15 when it comes to this gigantic -- and we're going to be
16 looking at CPMC soon. We're going to be looking at
17 Treasure Island and all these other gigantic --
18 Candlestick was gigantic. It's just daunting. If it's
19 daunting for us, it has to be daunting for the public.
20 So I think that there has to be a more reasonable way of
21 presenting these documents in a more digestible way so
22 that people can really fairly analyze it and in a timely
23 fashion. So we need to talk about it at some meeting, I
24 think.

TR.34.5

25 PRESIDENT MIGUEL: Commissioner Moore.

1 COMMISSIONER MOORE: I woul just like to thank
2 the public for the broad spectrum of concerns all
3 expressed.

4 Indeed, Commissioner Sugaya is correct. As
5 effective as your comments, they need to be tied to a
6 page, to a paragraph, and to a subject matter. And even
7 if you are not totally skilled in how to respond, the
8 more you tie them to a particular page you read, the
9 more effective you will be in receiving a response.
10 That would be a very kind of layman response. So that's
11 what you might do in the next few weeks, if you submit
12 your written comments.

13 On another note, it is not the design of this
14 project, not at all. I am concerned about this project
15 should be a greenfields site and it would be a wonderful
16 forward-looking project. I wouldn't have any concerns.
17 My concerns are about the massiveness of affecting the
18 existing community and the time frame in which it's
19 occurring. Thirty years by far exceeds any development
20 framework we have ever sat on and contemplated on
21 relative to large projects. Even Bayview Hunters Point
22 has a maximum time frame of 15 to 20 years. And I
23 suspect that if the economy is correct that they will do
24 that faster.

25 So I would actually very much support -- and I

TR.37.1

1 thought of it myself -- that this project in the EIR
2 should be asked to describe a seven-to-ten-year
3 incremental strategy about project packaging, which also
4 explains how infrastructure and transit improvements are
5 implemented commensurate with the gross impact this
6 project necessarily will have. I think that would be to
7 the comfort of the city at large. It would probably be
8 comfortable to everybody who is investing in it because
9 with success comes success. If the first phase is
10 successful, I assume that people will garner support and
11 see that the project works. However, if the community
12 is faced with that at Day One and has to look at thirty
13 years of change and construction impacts on how they
14 live, I can very well empathize with the fear and the
15 uncertainty which comes with it. I think it would be
16 better for the city to have a smaller packaged project.

17 And while we're looking at approving a final
18 ultimate EIR, the incremental performance should be
19 built on how this project is asked to perform. And I
20 would be a hell of a lot more comfortable -- and this is
21 not anything about deficiencies in planning,
22 deficiencies in forecasting an idealistic future -- but
23 at this moment it seems to be very far away to look at
24 the rerouting of the M-line. That is a fabulous idea
25 and I love it. And I think it's exactly in line with

TR.37.1
con't

1 our transportation objectives and how we want the city
2 ultimately to be adaptable and changing. However, just
3 to dangle that out and build out a community which does
4 not have the guarantee built into the EIR that this
5 would happen, I think is really a step for me where I
6 feel I'm hanging over the Alps, and I don't think I'm
7 going to do it. I like to bungee-jump but not on a cord
8 which I think might break. I don't think so.

TR.37.1
con't

9 In any case, having said that, I do believe
10 that if I would put myself into this community, I would
11 want to have a clearer marching route of how replacement
12 occurs and in what form.

13 In reaction to what Commissioner Olague said,
14 we had Trinity, a very difficult project, where we were
15 able to extract commitments which are now coming
16 through. Again, a very large project. The site is
17 smaller; however, the impact to existing residents was
18 very large. We very carefully helped maneuver this
19 project through its EIR and through its improvement
20 processes. We did the same thing with Alice Griffith.

TR.37.2

21 Here we have a one-to-one replacement in
22 similar housing with no disturbances of people who live
23 there because we have the guarantees built in. However,
24 in this project we would not be able to do that, given
25 that we have comparables in Los Angeles. So I do think

TR.37.2
con't

1 that this EIR, in order to fulfill what we all want it
2 to do, needs to address a whole other number of
3 questions which I cannot even formulate.

4 Those would be my comments. I will put them
5 in writing, with reference to the appropriate pages and
6 figures in the book.

7 PRESIDENT MIGUEL: Thank you.

8 Commissioner Antonini.

9 COMMISSIONER ANTONINI: I think that the
10 document did speak to the phases of the project. I mean
11 obviously there can always be more detail, but I thought
12 it did address and showed what was chronologically going
13 to happen and the sequence. And it did speak a little
14 bit about the relocations, the types of things that
15 ensure that the present residents would be taken care
16 of.

TR.35.8

17 I want to just thank everyone for commenting.
18 And I know it's a confusing issue with CEQA. And we in
19 no way -- we welcome your comments, even though
20 sometimes they weren't focused exactly on the adequacy
21 of the document, but they're very valuable comments.
22 And there will be an opportunity, as this project goes
23 forward, to hear those as we talk about the project
24 itself. thank you.

25 PRESIDENT MIGUEL: I'd like to thank

1 Commissioner Sugaya very much for his comments regarding
2 comments. I think they were very well taken. While you
3 were speaking, I took a look at one of the volumes; and
4 in the first page of the introduction it attempts to lay
5 out what CEQA is supposed to do. But it is language
6 that we up here in the department are more familiar
7 with; and it still takes two or three readings to
8 understand what they want from anyone making comments.

9 At the present time I've been working with
10 Bill Wycko and the department on the possibility of --
11 in fact, probability -- of some CEQA training for the
12 Commission itself. And the one thing that I hadn't
13 mentioned to Mr. Wycko was how to make comments that are
14 pertinent. And that might be a very good area to cover
15 as well as other areas during that.

16 As to the draft EIR itself, this is a
17 situation where you have a very massive land use project
18 that was built in an auto-centric concept and an
19 auto-centric time. The ecology and what we would now
20 consider ecological wastefulness of how it was built and
21 how it operates is totally different then than it is
22 now. And this project attempts to correct some of that
23 and brining it more into days thinking.

24 The Trinity reference, as to current tenants
25 and keeping their units, I thought was totally

TR.38.1

TR.38.2

1 appropriate. What is not dealt with is over 1,500 units
2 of affordable housing being lost. I'm most positive
3 that an EIR is the correct place to solve that
4 situation, but perhaps it is the correct place to
5 comment that it has to be solved. The solution is going
6 to be a legal one if it's going to happen. But the
7 comment that it is something that affects the city
8 drastically I think should be in there.

TR.38.3

9 As to the financial situation of the current
10 owner, CEQA does not require a financial statement. We
11 all know of the situation but it is not a CEQA issue.
12 So it's something in my mind that cannot be taken into
13 consideration.

TR.38.4

14 The comments that were made particularly
15 regarding that Commissioner Moore made regarding the
16 30-year timeline is something that is bothersome to me
17 also. I understand the fact that in order to get the
18 retail, in order to get the transportation, you need the
19 density and there's the byplay between all of these
20 elements and the finances that are involved in it, but
21 there are times when certain things have to be done
22 first, even though they are costly. And to my mind the
23 M-line and many of the situations regarding entrances,
24 exits, transit in general, have to come in an early
25 phase in order for the project to even go on 10 years,

TR.38.5

1 let alone 30. And the 30 still bothers me somewhat.

2 In general, I think the EIR is relatively
3 accurate, relatively adequate, and relatively complete.
4 There are always things we could think of that could be
5 done a little better. But other than what I've said so
6 far, I think it fulfills in general what a draft EIR
7 should fulfill.

8 Again, you heard the motion -- another two
9 weeks. You heard the recommendations, which I thought
10 were excellent. Tie your comments to specific sections,
11 to specific pages, to specific tables, to specific
12 concepts. And it makes -- it's going to make it much
13 easier, truthfully, for the department, because the
14 department is going to answer all of those. And so we
15 will have another volume such as this that will be the
16 responses to all of your comments. But if you want them
17 to be acknowledged correctly and to be dealt with
18 correctly, make them as specific and pointed and
19 referenced as possible.

20 And with that, we thank you.

21 COMMISSION SECRETARY: Thank you.

22 Public hearing for this item is over. And,
23 again, the written comment period has been extended to
24 the close of business, Monday, July 12th, 2010.

25 [The hearing ended at 7:47 p.m.]

1 STATE OF CALIFORNIA)
COUNTY OF SAN FRANCISCO)

2

3

CERTIFICATE OF REPORTER

4

5 I, FREDDIE REPPOND, a duly authorized Shorthand
6 Reporter and licensed Notary Public, do hereby certify
7 that on the date indicated herein that the above
8 proceedings were taken down by me in stenotype and
9 thereafter transcribed into typewriting and that this
10 transcript is a true record of the said proceedings.

11 IN WITNESS WHEREOF I have hereunto set my hand on
12 this 20th day of June, 2010.

13

14



15

FREDDIE REPPOND

16

17

18

19

20

21

22

23

24

25

RESPONSES TO TR.1

Cathy Lentz

Response TR.1.1

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project. The comment also raises a specific point about the proposed windmills and their effects on birds and bats; this issue is discussed in the EIR in Section V.M, Biological Resources, pp. V.M.30-V.M.35.

Response TR.1.2

The comment expresses concern about whether the Project Sponsor is financially able to complete the Proposed Project and implement the proposed mitigation measures. The purpose of the EIR is to identify and analyze the environmental effects of the Proposed Project, to propose alternatives that would address significant effects, and to identify mitigation measures. CEQA does not require an analysis of whether the Project Sponsor has sufficient financing to construct the Proposed Project. As part of project approvals, the City would adopt a Mitigation Monitoring and Reporting Program (MMRP) that requires the implementation of the mitigation measures identified in the MMRP, prior to the issuance of building permits or at other specified milestones.

Furthermore, the financial status of the current Project Sponsor does not determine whether or not the Proposed Project is constructed. Because all of the project approvals described in the EIR, including the mitigation measures imposed as conditions of approval, would be binding on any subsequent owner of the Project Site, even if the Project Sponsor sells the Project Site, any requirements imposed on the Project Sponsor by these approvals would continue to be borne by any subsequent owner of the Project Site, and not the City.

It is possible that certain transportation and infrastructure improvements proposed as part of the Project, including the realignment of the Muni M Ocean View line, may not be constructed due to the financial status of the Project Sponsor. Accordingly, the EIR analyzes the Project as proposed, with the realignment of the Muni M Ocean View line, as well as an alternative that does not include this realignment (the "Full Project Buildout with Transit Options Alternative," described in Chapter VII, Alternatives to the Proposed Project, on pp. VII.48-VII.61). Residential and commercial uses described for the Proposed Project could be constructed before the Proposed Project's transportation and infrastructure improvements. When considering approval of the Proposed Project, the Planning Commission and the Board of Supervisors may consider provisions requiring that certain proposed infrastructure and transportation

improvements be constructed in conjunction with the proposed residential and commercial development.

Response TR.1.3

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.2

Bernard Choden, San Francisco Tomorrow

Response TR.2.1

The comment states that mitigation measures are needed to ensure safety due to the Proposed Project's proximity to the San Andreas fault. Please see Master Response A.3, Seismic Hazards, in Section III.A, Master Responses.

Response TR.2.2

The comment expresses concerns over the displacement of existing residents and the gentrification of Parkmerced as a result of the Proposed Project. As stated in Chapter III, Project Description, on p. III.15, 1,683 of the 3,221 existing units on the Project Site would be retained as part of the Proposed Project. These units are all located in the 11 existing tower buildings. The remaining existing 1,538 units, all located in the garden apartments, would be demolished and replaced with new apartments, and about 5,679 net new units would be added under the proposal. In total, upon completion of the Proposed Project, there would be about 8,900 units on the Parkmerced Site (1,683 existing-to-be-retained units + 1,538 newly constructed replacement units + 5,679 newly constructed units = 8,900 units).

Development of the Proposed Project would not displace existing Parkmerced residents. As described on p. III.15 of the EIR, all residents of existing apartments that are proposed to be replaced would be provided with the opportunity to move to a new apartment before their unit is demolished. Construction and demolition would be phased to ensure that the residents of the units to be demolished would be required to move into a new apartment only once. Under a Development Agreement proposed by the Project Sponsor, these new apartments would be rented at the same rent-controlled rate as the residents' existing apartments prior to demolition and would be covered by the same restrictions on rent increases as contained in the San Francisco Rent Stabilization and Arbitration Ordinance. Existing residents would not be required to move off site at any point during any phase of the Proposed Project. The proposed Development Agreement, which is part of the Proposed Project, sets forth these requirements.

III. Comments and Responses
B. Public Hearing Comments and Responses

Because the Proposed Project, through its proposed Development Agreement, would provide replacement units for existing tenants and because those replacement units would be rented at the same rent-controlled rate as the residents' existing units and would be covered by the San Francisco Rent Stabilization and Arbitration Ordinance, the Draft EIR concluded that the Proposed Project would have a less-than-significant impact to population and housing. (See Section V.C, Population and Housing, on pp. V.C.12-V.C.13.)

Additionally, as discussed in Section V.C, Population and Housing, on pp. V.C.13-V.C.14, the Proposed Project would increase the City's housing stock and would therefore contribute to the City's ability to meet the broader need for housing options of varying sizes, types, and levels of affordability. The Project would be subject to the affordability requirements of the City's existing Inclusionary Affordable Housing Program for the 5,679 net new units proposed on the Project Site, as set forth in the proposed Development Agreement. The Project Sponsor has agreed to provide 15 percent of the net new units at below market rate housing, which would be expected to support the City's efforts to meet its regional housing needs allocation and the total projected Bay Area housing needs. The proposed units would be in addition to the replacement rent-controlled units and would add to the projected number of housing units at above moderate income and moderate income levels. To clarify this issue, the following text has been added to the third sentence in the last paragraph starting on p.V.C.13 and continuing on p. V.C.14:

...The Project Sponsor has agreed to provide a minimum of 852 net new units of below market rate housing to either be provided on site or off site, or an in-lieu fee for an equivalent number of units on the Project Site.³⁴

Footnote 34 on p. V.C.14 has also been revised:

³⁴The Project Sponsor proposes to retain 1,683 existing units, replace 1,538 units, and add 5,679 new units to the Project Site, for a total of 8,900 housing units. Of the 5,679 net new housing units, a minimum of 15 percent of them (852 units) would have to be below market rate units, ~~if those units were constructed on site.~~

Although the comment expresses concerns about the potential for gentrification as a result of the Proposed Project, gentrification is an economic and social effect, which CEQA does not require to be evaluated in the EIR, as it is not relevant to the significance criteria established by the Planning Department's Initial Study Checklist. To the extent that this comment raises concerns about environmental impacts that may indirectly result from such economic and social impacts, those issues have been addressed in Section V.A, Land Use, on pp. V.A.10-V.A.13, and Section V.C, Population and Housing, on pp. V.C.12-V.C.14.

Response TR.2.3

The comment proposes development of a financial type of cooperative that would benefit the developer and tenants and lessen the financial pressure on the Project Sponsor. The comment suggests that a limited cooperative could provide the management development mechanisms needed and assurances for both the tenants and developer. The proposed structure of the ownership entity is outside the scope of the EIR because it does not concern issues related to the environmental impacts of the Proposed Project. Moreover, the City lacks the legal authority to require a change in the ownership of Parkmerced.

RESPONSES TO TR.3

Elizabeth Ranieri

Response TR.3.1

This comment expresses general support for the Proposed Project and states that it would improve public transit; reduce water and energy use; contribute to a green future; provide amenities in the form of retail, parks, daycare, schools, and an urban farm; and reduce automobile dependence. Project characteristics and features are described in Chapter III, Project Description, on pp. III.15-III.54. The EIR addresses transportation and transit throughout Section V.E, Transportation and Circulation; water use in Section V.K, Utilities and Services Systems, on pp. V.K.1-V.K.22; and energy use in Section V.Q, Mineral and Energy Resources, on pp. V.Q.1-V.Q.5. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.4

Arne Larsen

Response TR.4.1

This comment expresses general support for the Proposed Project and states that it would retain rent control; introduce transit into the neighborhood; add businesses; and add needed housing and density. Rent control is discussed in Chapter III, Project Description, on pp. III.15-III.16; in Chapter IV, Plans and Policies, on p. IV.2; in Section V.A, Land Use, on p. V.A.10; and in Section V.C, Population and Housing, on pp. V.C.1-V.C.18. Proposed retail and commercial uses are described on p. III.16 and analyzed throughout the EIR. Population and density are also discussed in Section V.C, and the change in population is addressed throughout the EIR. Transit is discussed throughout Section V.E, Transportation and Circulation. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.5

Bert Hill, Board Member, Livable City

Response TR.5.1

This comment expresses general support for the Proposed Project and states that it includes well-thought-out conservation, community, and sustainability elements, including human-powered transportation (bicycles), transit accessibility, efficient water use including reduction in wastewater and recharge of Lake Merced, conservation of utilities, and installation of solar panels, and other sustainable energy use. The EIR addresses sustainability elements of the Proposed Project in Chapter III, Project Description, on pp. III.53-III.54. Transportation and transit are discussed throughout Section V.E, Transportation and Circulation. Water use and utilities are described in Section V.K, Utilities and Services Systems. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response TR.5.2

The comment raises concerns about a proposed development on the adjacent property at 800 Brotherhood Way. The approved but unbuilt 800 Brotherhood Way project is not located on the Project Site, is not owned by the Project Sponsor, and is not considered part of the Proposed Project. The 800 Brotherhood Way project is, however, analyzed under cumulative scenarios for the topics of Land Use, Aesthetics, Population and Housing, Transportation and Circulation, Noise, Air Quality, Wind and Shadow, Recreation, Utilities and Services Systems, Public Services, Biological Resources, Geology and Soils, Hydrology and Water Quality, and Hazards and Hazardous Materials.

Response TR.5.3

The comment states that routing the Metro line to Daly City instead of Balboa Park would provide a public transportation alternative for southbound commuters from the west side of the City. The Proposed project does include operation of a dedicated shuttle between the Project Site and Balboa Park BART station for Parkmerced residents. However, extension of the M Ocean View south to the Daly City BART station is not proposed as part of the Proposed Project or the San Francisco Municipal Transportation Agency's (SFMTA) Transit Effectiveness Project (TEP). Further, extension of the M Ocean View to the Daly City BART station is not needed to mitigate significant project-related impacts, and is therefore not included in the EIR.

Extension of the M Ocean View to the Daly City BART station may be considered among other large-scale transportation improvements in the area as part of Tier 5 of the *19th Avenue Corridor Study*. See Section 3.1 of Master Response A.2, Transportation and Circulation, in Section III.A,

Master Responses, for additional discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

Response TR.5.4

The comment states that the Proposed Project provides too much parking and that the proposed residential parking supply is not consistent with high-density transit-oriented housing. See Section 2.3 of Master Response A.2, Transportation and Circulation, in Section III.A, Master Responses, for additional discussion of the Proposed Project's parking supply.

RESPONSE TO TR.6

Jacklynn Jweinat, Yousef Realty

Response TR.6.1

This comment expresses general support for the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. It specifically refers to a proposed circulation change that would add new access from 19th Avenue to Cambon Drive, facilitating vehicular and pedestrian access to the existing retail area in the Parkmerced Shopping Center. This proposed change is analyzed in Section V.E, Transportation and Circulation, in the EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.7

Aaron Goodman

Response TR.7.1

The comment states that the discussion of alternatives in the Draft EIR is inadequate. Please see Master Response A.4, Alternatives, in Section III.A, Master Responses, for a discussion of the adequacy of the range of alternatives analyzed.

Response TR.7.2

The comment states that the discussion of the Infill Development within the Historic District Alternative in Chapter VII, Alternatives to the Proposed Project, in Section VII.G, Details of Alternatives Considered and Rejected, pp. VII.74-VII.78, is inadequate. Please see Master Response A.4, Alternatives.

Response TR.7.3

The comment states that the Draft EIR does not analyze the original boundary of the Parkmerced Project Site. As stated in Chapter III, Project Description, on p. III.4, the Project Site consists of

approximately 152 acres and is generally bounded by Vidal Drive, Font Boulevard, Pinto Avenue, and Serrano Drive to the north, 19th Avenue and Junipero Serra Boulevard to the east, Brotherhood Way to the south, and Lake Merced Boulevard to the west. The original Parkmerced property as configured in 1951 contained 47 residential blocks, totaling 192 acres. As shown in Figure C&R.1: Existing and Original Parkmerced Property Boundary (see Master Response A.1, Historic Resources, in Section III.A, Master Responses), the original boundaries started at the southwest intersection of 19th Avenue and Holloway Avenue, ran west along Holloway Avenue, turned north on and around the south/east side of Tapia Drive, ran northwest along Font Boulevard, turned south on Lake Merced Boulevard, then east on Brotherhood Way, then north on Junipero Serra Boulevard to 19th Avenue. Between 2000 and 2005, various blocks of the original development complex were sold to third parties, including San Francisco State University, and 77-111 Cambon Drive. The Project Site now encompasses about 78 percent of the original Parkmerced property.

The EIR appropriately analyzes the 152-acre Project Site as it is currently configured. The Project Sponsor does not own, nor has control of, off-site properties, including those sold-off lots and blocks included in the original development configuration. Cumulative discussions in the EIR do consider the proposed development programs for the 40 acres of sold-off properties. These are identified in the EIR as the SFSU Master Plan and 77-111 Cambon Drive, and are identified in the cumulative discussions under the topics of V.A, Land Use; V.B, Aesthetics; V.C, Population and Housing; V.D, Cultural Resources; V.E, Transportation and Circulation; V.F, Noise; V.G, Air Quality; V.I, Wind and Shadow; V.J, Recreation; V.K, Utilities and Services Systems; V.L, Public Services; V.M, Biological Resources; V.N, Geology and Soils; V.O, Hydrology and Water Quality; and V.P, Hazards and Hazardous Materials.

Please also see Master Response A.1, Historic Resources, for a discussion of the definition of the historic resource and district boundary.

Response TR.7.4

The comment states that the Draft EIR is negligent in following CEQA requirements by not analyzing the 192 acres of the original Parkmerced site. As stated above in Response TR.7.3, the EIR appropriately analyzes the Proposed Project planned on the 152-acre Project Site. The Project Sponsor does not own, nor does it have control of, future development on off-site properties, including pending and future proposals on those sold-off lots and blocks included in the original development configuration.

Response TR.7.5

The comment requests that rejection of Alternative G, Infill Development within the Historic District, in Chapter VII, Alternatives to the Proposed Project, in Section VII.G, Details of

Alternatives Considered and Rejected, pp. VII.74-VII.78, be reconsidered. Please see Master Response A.4, Alternatives.

Response TR.7.6

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response TR.7.7

The comment asks that the Project Sponsor be required to construct transit improvements in advance of other project elements. The Planning Commission and Board of Supervisors will consider all aspects of the proposed development program as well as phasing of development, and could consider provisions requiring that transportation infrastructure improvements be constructed during early phases of project implementation.

RESPONSES TO TR.8

Julian Lagos

Response TR.8.1

This comment asserts that the EIR is deficient in a number of topic areas, but does not specify what the alleged deficiencies are. To the extent that the comment raises issues about affordable housing, please see Response TR.2.2.

Response TR.8.2

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures. Please see Response TR.1.2 for a discussion of this issue.

Response TR.8.3

The comment raises concerns about the loss of rent-controlled units as a result of implementation of the Proposed Project. Please refer to Response TR.20.2 for additional discussion of rent-control issues.

Response TR.8.4

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. To

the extent that the comment calls for preserving affordable housing, please see Response TR.2.2. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSE TO TR.9

Mary Beth Sanders, Co-Chair, Project Review Committee, San Francisco Planning + Urban Research Association

Response TR.9.1

This comment expresses general support for the Proposed Project and states that the Project provides an appropriate increase in density on San Francisco's west side; reconnects the site to the City's street grid; fosters a commitment to public transit; and recognizes the need for neighborhood-serving retail and professional service business. The EIR addresses proposed land uses in Chapter III, Project Description, on pp. III.15-III.29. Population density is discussed in Section V.A, Land Use, on pp. V.A.10-V.A.13, and in Section V.C, Population and Housing. Traffic, circulation, and transit are discussed throughout Section V.E, Transportation and Circulation. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.10

Fred Kriebel, Kriebel and Associates

Response TR.10.1

This comment expresses a general opinion regarding the overall adequacy of the Draft EIR. The San Francisco Planning Commission will consider the adequacy and completeness of the EIR based upon the administrative record as a whole at a public meeting on certification of the Final EIR.

Response TR.10.2

This comment expresses general support for the Proposed Project but does not provide any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

RESPONSES TO TR.11

Linh Le

Response TR.11.1

This comment expresses general opposition to the Proposed Project and specifically raises the issue of demolition of landmark and historic garden townhouses. The EIR addresses Historic Architectural Resources in Section V.D.a, pp. V.D.1-V.D.29. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response TR.11.2

The comment states that existing poor traffic conditions will worsen as a result of implementation of the Proposed Project. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy or the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for additional discussion of this issue.

Response TR.11.3

The comment asserts that neighborhood businesses in surrounding and adjacent areas would be affected by the Proposed Project. As described in the EIR in Chapter III, Project Description, p. III.16, the Proposed Project includes about 310,000 gross square feet (gsf) of retail and office space to accommodate neighborhood and service-oriented uses (such as a grocery store, restaurants, and banking). This retail and office space would be constructed in a centralized neighborhood core along Crespi Drive between Gonzalez Drive and Juan Bautista Circle and bounded by Font Boulevard and Fuente Drive. There are also smaller neighborhood-serving retail uses planned throughout the Project Site, near the planned residential units, so that residents would be able to purchase convenience items close to home.

There are several existing retail and commercial service areas in the vicinity of the Project Site and within the 19th Avenue Corridor area. Lakeshore Plaza is a neighborhood shopping center located approximately 1 mile northwest of the site, on the south side of Sloat Boulevard between Everglade and Clearfield Drive. The Stonestown Galleria is a regional shopping center located approximately 0.5 mile north of the site, on the west side of 19th Avenue between Eucalyptus Drive and Buckingham Way. The Westlake Shopping Center is a shopping center located approximately 1.25 miles south of the site in Daly City, on the south side of John Daly Boulevard between Park Plaza Drive and Lake Merced Boulevard. The Parkmerced Shopping Center is a neighborhood-serving shopping center located directly adjacent to the eastern boundary of the Project Site, at 77-111 Cambon Drive. There are also neighborhood-serving retail uses concentrated along West Portal Avenue between the West Portal Muni station and 15th Avenue,

about 1 mile from the Project Site, and along Ocean Avenue between Phelan Avenue and Lakewood Avenue, about 1 mile from the Project Site.

As stated in Section V.C, Population and Housing, p. V.C.13, if the Proposed Project is implemented, at buildout the Parkmerced neighborhood would have a total population of about 20,290 residents (an increase of about 12,950 residents over the current population). The increase in the residential population of the Parkmerced neighborhood would generate new demand for local goods and services. Substantial economic effects on surrounding existing retail and commercial establishments, and thus any resulting indirect environmental impacts, are not expected. Furthermore, CEQA (*CEQA Guidelines* Section 15134) states that economic effects of a project shall not be treated as significant effects on the environment; however, they may be used to determine the significance of physical changes caused by a project.

Response TR.11.4

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures. Please see Response TR.1.2 for a discussion of this issue.

RESPONSES TO TR.12

David Meckel, Director of Research and Planning, California College of the Arts

Response TR.12.1

The comment expresses a general opinion regarding the overall adequacy of the Draft EIR. The San Francisco Planning Commission will consider the adequacy and completeness of the EIR based upon the administrative record as a whole at a public meeting on certification of the Final EIR.

Response TR.12.2

This comment expresses general support for the Proposed Project but does not raise any specific comment on the Draft EIR. To the extent that the comment raises issues about housing, water, energy, transit, and aesthetics, those topics are discussed in the EIR in Sections V.C, Population and Housing; V.K, Utilities and Services Systems; V.Q, Mineral and Energy Resources; V.E, Transportation and Circulation; and V.B, Aesthetics. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

RESPONSES TO TR.13

Jim Coppfer

Response TR.13.1

This comment expresses general support for the Proposed Project and states that it could be a landmark for green living and energy use. The EIR addresses energy use in Section V.Q, Mineral and Energy Resources. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSE TO TR.14

Daniel Phillips, President, Board of Directors, Parkmerced Residents Organization

Response TR.14.1

This comment expresses general support for the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.15

Jeremy Setzer

Response TR.15.1

The comment expresses general opposition to the Proposed Project and raises issues regarding increased density and lost greenery. The EIR discusses population density in Section V.C, Population and Housing. The density of the Proposed Project would be similar to that allowed in RM-2 and RM-3 districts at approximately 1 dwelling unit for each 560 square feet of land excluding streets. Project open space is discussed in Chapter III, Project Description, on pp. III.16-III.29, and in Section V.J, Recreation, on pp. V.J.6-V.J.10. Please see Responses 17.4 and 19.1 for a discussion of the effects of increasing population density on the Project Site, Response 28.5 for a discussion of open space, and Response 53.5 for a discussion of replacement landscaping.

Response TR.15.2

The comment expresses concerns about the Proposed Project's contribution to traffic congestion. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A,

Master Responses, for additional discussion of this issue. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSE TO TR.16

Joel Koppel

Response TR.16.1

This comment expresses general support for the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.17

Maria Elena Guerrero Engber

Response TR.17.1

The comment asserts that the Draft EIR does not adequately address potential health and quality of life impacts of the Proposed Project. The EIR identifies the adverse effects of the Proposed Project for the decision-makers to consider. Impacts related to public health and “quality of life” span various issues that are addressed separately in the EIR. Section V.F, Noise, and Section V.G, Air Quality, are two examples of issues studied in the EIR that are related to “quality of life” where the results of the study indicate significant and unavoidable impacts. Decision-makers must balance these significant environmental impacts with other environmental and non-environmental considerations when deliberating project approval. The EIR discloses the impacts for consideration by the decision-makers.

Response TR.17.2

The comment expresses concern about the Proposed Project’s impacts on the bird population due to proposed tree removal. As described in Chapter III, Project Description, p. III.6, the existing vegetation on the Project Site consists of non-native and cultivated species, including mature trees, geometrically-shaped lawns, and a variety of shrubs and ornamental plantings. Monterey pine is the most common tree species and occurs as large, isolated street trees within the oval Commons area and along the southern boundary of the Project Site, north of Brotherhood Way. In the overall landscape design, trees, shrubs, and ornamental plantings are located along landscaped drives, exterior block façades, shared open spaces, courtyards, and service areas. The Project Site contains over 1,500 trees: 298 significant trees, 189 street trees, and over 1,000 interior trees. There are no designated landmark trees on the Project Site. The various tree species types on and in the vicinity of the Project Site are described in Section V.M, Biological Resources, on pp. V.M.2-V.M.5.

As stated on p. III.23 of the EIR, most of the trees on the Project Site, excluding those along the southern slope adjacent to Brotherhood Way, would need to be removed or relocated due to the proposed construction and grading activities. Any tree removal activity would be phased, corresponding to one of the four construction phases (see Figures III.19-III.23 in Chapter III, Project Description, pp. III.54-III.65). Prior to removal, trees would be assessed for their condition and suitability for possible relocation. In addition, a tree replacement plan is included as part of the Proposed Project, as part of a future landscape design plan. Proposed tree species would likely be native species and/or species closely adapted to the climate conditions of the Project Site.

Impact BI-4, in Section V.M, Biological Resources, pp. V.M.27-V.M.28, summarizes impacts on nesting and migratory birds as a result of the planned tree removal activities. As described on those pages, the numerous trees and shrubs on the Project Site provide suitable stopover habitat for migratory birds. Gradually, over the 20-year buildout period for the Proposed Project, most of the existing on-site vegetation would be removed in phases. As a result, there would be a number of short-term losses of migratory bird stopover habitat. However, the Proposed Project would add new landscaping that would replace the existing ornamental landscaping, creating new habitat for wildlife. Thus, the EIR concludes that the impact to the movement of any native resident or migratory wildlife species or to established native resident or migratory wildlife corridors would be short term, and this impact would be considered less than significant.

Trees and shrubs throughout the site also provide nesting habitat for urban-adapted bird species. Vegetation removal and/or building demolition during the breeding season (approximately March through August) could remove trees, shrubs, and/or buildings that support active nests. As described in Section V.M, Biological Resources, p. V.M.27, all native birds and their nests are protected by the federal Migratory Bird Treaty Act and California Fish and Game Code. The EIR concludes that this potentially significant impact would be reduced to a less-than-significant level by implementation of Mitigation Measure M-BI-4, which requires that breeding bird surveys be conducted before construction activities begin and that buffers be created around confirmed nesting sites.

Response TR.17.3

This comment expresses general opposition to the Proposed Project, stating that the only acceptable alternative is the No Project Alternative and that Parkmerced should be designated as a landmark historical site. This comment does not raise any specific comment on the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response TR.17.4

This comment summarizes the topics in the Draft EIR for which significant and unavoidable impacts were identified, and specifically cites an impact in the EIR that addresses exposure of persons to toxic air contaminants during construction. The comment also asks about the costs of asbestos removal in the units that would be demolished and asserts that the Draft EIR does not address the health effects of exposing residents to asbestos from demolished buildings over the construction phases.

Certain quantities of toxic air contaminants and reactive organic compounds are emitted as a result of any construction activity and any motor vehicle activity, and those related to the Proposed Project are identified throughout Section V.G, Air Quality. In some cases, these impacts would be significant and unavoidable (for example, construction-related emissions in Impact AQ-3, p. V.G.24), and feasible mitigation is identified (Mitigation Measure M-AQ-3).

The cost of asbestos removal is not an environmental effect and is therefore not discussed in the EIR.

The potential for adverse health effects related to asbestos removal is discussed in Section V.P, Hazards and Hazardous Materials, under Impact HZ-2, pp. V.P.10-V.P.17. As discussed on p. V.P.7, asbestos-containing materials (ACMs) were present in thermal system insulation and various miscellaneous materials such as roofing, flooring materials, and insulation materials. Over the past several years, the Parkmerced management has implemented an Asbestos Operations and Management program (prepared in 1999) to maintain and dispose of ACMs. Maintenance personnel periodically monitor the condition of ACMs and repair or dispose of ACMs as needed. When maintenance that would disturb ACMs is needed, an asbestos removal contractor is hired to remove the ACMs before work continues.

The Proposed Project involves demolition and removal of existing buildings. As stated on p. V.P.10, any activity that involves cutting, grinding, or drilling of ACMs during building renovation or demolition could release asbestos fibers, unless proper precautions are taken. Federal, state, and local regulations require testing of building materials that may contain asbestos prior to demolition or renovation. Any testing, removal, or disturbance of ACMs must be performed by licensed, qualified asbestos abatement personnel.

State law requires an applicant to demonstrate compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos, before a local agency (in this case, the City's Department of Building Inspection) issues a permit. The local office of Cal/OSHA must be notified of planned asbestos abatement.

The Bay Area Air Quality Management District (BAAQMD) has authority to regulate airborne pollutants, including asbestos, through both inspection and enforcement, and is to be notified 10 days in advance of any proposed demolition or abatement work. The BAAQMD inspects any removal operation for which a complaint has been received.

Asbestos abatement contractors must follow state regulations. Asbestos removal contractors must be certified by the Contractors Licensing Board of the State of California.

Therefore, compliance with the regulations and procedures described above would ensure that any potential impacts due to asbestos removal would be less than significant.

RESPONSES TO TR.18

Dennis Norrington

Response TR.18.1

The comment asserts that the retail and commercial space proposed by the Project is unnecessary and may not be economically viable. Please see Response TR.11.3 for a discussion of who is expected to be served by the proposed retail area and information about nearby shopping centers.

Response TR.18.2

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response TR.18.3

The comment raises concerns about the displacement of residents as a result of implementation of the Proposed Project. Please refer to Response TR.2.2 for a discussion of displacement.

Response TR.18.4

The comment asserts that new high-rise towers should not be constructed on the Project Site due to its proximity to the San Andreas fault. Please see Master Response A.3, Seismic Hazards, in Section III.A, Master Responses.

RESPONSE TO TR.19

Kevin McDonough

Response TR.19.1

This comment expresses general support for the Proposed Project, stating that the EIR addresses transportation issues and that the Proposed Project is well designed and fills a need for higher density in San Francisco. The EIR describes project design and transportation infrastructure improvements in Chapter III, Project Description, pp. III.15-54, as well as in the associated *Parkmerced Design Standards and Guidelines* (EIR Appendix B). The EIR analyzes transportation and circulation impacts throughout Section V.E, Transportation and Circulation. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.20

Mitchell Omerberg, Affordable Housing Alliance

Response TR.20.1

The comment asserts that the original Parkmerced is irreplaceable partially because the construction costs for the original development would not be at all comparable to today's costs to construct the Proposed Project. The cost of construction is not an environmental impact and is therefore not discussed in this Draft EIR.

Response TR.20.2

The comment asserts that the rent control ordinance does not apply to buildings constructed after 1978 under the Costa-Hawkins Rental Housing Act. This comment does not raise any issues related to the adequacy or accuracy of the Draft EIR.

For informational purposes, under the terms of the proposed Development Agreement between the City and the Project Sponsor, all 1,583 replacement units would be subject to the same terms as the San Francisco Rent Stabilization and Arbitration Ordinance for the life of the building regardless of the tenant occupying the unit. A Development Agreement is a contractual agreement between the City and the Project Sponsor or any subsequent property owner. Thus, while newly-constructed, replacement units would not be subject to the actual Rent Stabilization and Arbitration Ordinance because of their age, they would be subject to a contractual agreement setting forth the same protections.

Please see also TR.2.2 for information regarding the displacement of residents and the Draft EIR's analysis of impacts related to Population and Housing.

Response TR.20.3

The comment asserts that the rent protections proposed for the 1,538 replacement units are unenforceable under recent judicial decisions. In particular, the comment cites to *Palmer/Sixth Street Properties v. City of Los Angeles* (175 Cal. App. 4th 1396 (2009)) and *Embassy LLC v. City of Santa Monica* (Cal. App. 2d Dist., filed June 14, 2010).

These decisions did not address issues related to CEQA, the CEQA Guidelines, or any other issues related to environmental impacts. Rather, the *Palmer* decision concerns requirements regarding the provision of on-site inclusionary housing and the *Embassy* decision concerns a property owner's waiver of certain rights under the state Ellis Act, which, in turn, concerns a property owner's ability to remove property from the rental market.

As such, these decisions concern potential economic and social effects of the Proposed Project, related to inclusionary housing and rent control, and, as set forth in CEQA Guidelines Section 15131(a), such effects shall not be treated as effects on the environment. To the extent that such economic and social effects of the Proposed Project may indirectly result in environmental impacts, those potential impacts have been addressed in Section V.A, Land Use, pp. V.A.10-V.A.13, and Section V.C, Population and Housing, pp. V.C.12-V.C.13. Please also see Response TR.2.2 for additional information regarding the Draft EIR's analysis of impacts related to Population and Housing and the displacement of residents.

RESPONSE TO TR.21

Michael Pappas, San Francisco Interfaith Council

Response TR.21.1

This comment expresses general support of the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSE TO TR.22

Terrance Faulkner

Response TR.22.1

The comment raises concerns over the Project Sponsor's ability to complete the Proposed Project, citing recent financial media coverage of the Project Sponsor. Please see Response TR.1.2 for a discussion of this issue.

Response TR.22.2

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers on as part of their decision to approve or disapprove the Proposed Project.

RESPONSE TO TR.23

Kate Lefkowitz, Program Manager, San Francisco Housing Action Coalition

Response TR.23.1

This comment states that the Draft EIR is balanced, thorough, and adequate. This comment also expresses general support for the Proposed Project and states that it would bring an appropriate increase in density to a low density area; protect residents and rent control; provide inclusionary housing; invest in transit infrastructure; discourage automobile use; conserve water; and provide energy efficient development. Rent control is discussed in Chapter III, Project Description, on p. III.15; in Chapter IV, Plans and Policies, on p. IV.2; and in Section, V.A, Land Use, on p. V.A.10. Population density is discussed in Section V.C, Population and Housing, pp. V.C.1-V.C.18. Transportation issues are discussed throughout Section V.E, Transportation and Circulation. Water use is discussed in Section V.K, Utilities and Services Systems, pp. V.K.1-V.K.22. Energy use is discussed in Section V.Q, Mineral and Energy Resources, on pp. V.Q.1-V.Q.5. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.24

Dean Preston, Executive Director, Tenants Together

Response TR.24.1

The comment expresses concerns about the enforceability of replaced, rent-controlled units. Please see Responses TR.2.2 and TR.20.2 for a discussion of this issue.

Response TR.24.2

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures. Please see Response TR.1.2 for a discussion of this issue.

Response TR.24.3

The comment raises questions over the enforceability of replaced, rent-controlled units. Please see Responses TR.2.2 and TR.20.2 for a discussion of this issue.

RESPONSES TO TR.25

Inge Horton, Board of Directors, Sunset Parkside Education and Action Committee

Response TR.25.1

The comment raises concerns regarding transportation impacts as a result implementation of the Proposed Project. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for additional discussion of this issue.

Response TR.25.2

The comment states that the temporary closure of the southern part of the Great Highway has increased traffic on other routes including Sloat and Sunset Boulevards, the Great Highway, and 19th Avenue. A portion of the Great Highway near the San Francisco Zoo has been frequently closed for periods ranging from days to several weeks for maintenance over the past year, with the next phase of construction and lane closures expected to occur between late August 2010 and mid-October 2010. The maintenance project is intended to provide increased stability and reduce the need for more frequent closures due to erosion. The analysis in the EIR does not account for this temporary maintenance-related closure (or any other) because such closures are short in duration and are not expected to result in substantial changes to typical travel patterns over the long term.

Response TR.25.3

The comment notes adverse impacts of the Proposed Project on traffic impacts along 19th Avenue and Parkmerced Boulevard, as described in the Transportation Impact Analysis Report prepared for the EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, for additional discussion of this issue.

This comment also expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR.

Response TR.25.4

The comment raises concerns about travel times to the San Francisco Airport and the Peninsula. Travel times to and from the San Francisco Airport and the Peninsula are not specifically discussed or analyzed in the Draft EIR. The metric chosen by the City of San Francisco to identify significant traffic-related impacts is intersection level of service, which is discussed throughout the Draft EIR. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, for additional discussion of this issue.

Response TR.25.5

The comment raises concerns over whether cumulative traffic impacts were properly considered. The EIR provides an analysis of the direct impacts of the Proposed Project as well as the Proposed Project's contribution to cumulative impacts. A discussion of the Proposed Project's contribution to cumulative impacts is presented in Section V.E, Transportation and Circulation, on pp. V.E.105-V.E.127. The methodology for developing long-term cumulative traffic forecasts is described in the EIR on pp. V.E.47-V.E.50. In general, the analysis of cumulative impacts is based on anticipated land use growth projections between now and year 2030 conditions. Land use forecasts for year 2030 were provided by the Association of Bay Area Governments and the associated long-term traffic volumes were forecasted using the City's Travel Demand Forecasting model.

Response TR.25.6

The comment states that demolition of rental units is not an environmentally sustainable feature. As summarized in Chapter III, Project Description, p. III.1, all 1,538 of the existing two-story garden apartments, as well as associated parking, building services, a leasing/operations office, and a private pre-school/day care facility, are proposed to be demolished over the 20-year construction period. Waste is generated from demolition activities; however, as required by local ordinance, much of that material must be diverted from landfills and reused. As stated in Table V.H.3: City Regulations Applicable to the Proposed Project, in Section V.H, Greenhouse Gas Emissions, p. V.H.19, as a requirement of the San Francisco Green Building Requirements, at least 75 percent of the project's construction and demolition debris is required to be recycled. The Proposed Project would also be required to use construction techniques intended to reduce carbon emissions and minimize the waste of materials. In addition, energy and greenhouse gas emissions embodied in waste material and generated by demolition and construction activities for the Proposed Project would be partly or wholly offset by the more energy-efficient operation of the new structures and by the reduced per capita transportation energy consumption that can result from increased residential density. As listed in Table V.H.3, pp.V.H.18-V.H.19, there are

several City regulations applicable to the Proposed Project that would serve to reduce energy consumption and water use, increase recycling, and encourage transit use, among other things.

Response TR.25.7

The comment requests preparation of a socio-economic analysis as an addendum to the EIR. CEQA (*CEQA Guidelines* Section 15134) states that economic or social effects of a project shall not be treated as significant effects on the environment. However economic or social effects may be used to determine the significance of physical changes caused by a project.

Additionally, as discussed in Section V.C, Population and Housing, on pp. V.C.13-V.C.14, the Proposed Project would increase the City's housing stock and would therefore contribute to the City's ability to meet the broader need for housing options of varying sizes, types, and levels of affordability. The Project would also be subject to the affordability requirements of the City's existing Inclusionary Affordable Housing Program for the 5,679 net new units proposed on the Project Site, which may additionally be enforced through the proposed Development Agreement. The Project Sponsor has proposed to provide 15 percent of the net new units at below market rate housing. These below market rate units would be affordable to households earning up to 120 percent of the Area Median Income. The proposed number of market rate (4,827) and below market rate (852) units would be expected to support the City's efforts to meet its regional housing needs allocation and the total projected Bay Area housing needs. The proposed units would also add to the projected number of housing units at above moderate income and moderate income levels. There are no physical or environmental effects identified as a result of the displacement of residents. Therefore, a separate socio-economic study is not required by CEQA. Please also see Response TR.2.2.

RESPONSES TO TR.26

Mary Ann Miller, Member of the Board, San Francisco Tomorrow

Response TR.26.1

The comment states that the EIR's size and complexity make it difficult to navigate and analyze, and the EIR should be reorganized or should analyze project impacts by phase rather than at a single full buildout year.

The Parkmerced Project was analyzed pursuant to *CEQA Guidelines* Section 15161- Project EIR. As described in the EIR in Chapter I, Introduction, p. I.1, the Parkmerced Project is a project-level EIR. A project-level EIR focuses primarily on the changes in the environment that would result from buildout of a project, and examines the impacts of all phases of the project including planning, construction, and operation.

As a project-level EIR, the Parkmerced EIR analyzes the entirety of the Proposed Project. As described in Chapter III, pp. III.54-III.65, construction of the Proposed Project is anticipated to begin around 2010 and would be phased over an approximately 20-year period, with anticipated completion of development expected to occur in 2030. The Proposed Project is expected to occur over four major phases. This development program includes transportation, infrastructure, and landscaping improvements that would occur in tandem as the respective areas are developed, in general accordance with the phasing schedule.

The EIR appropriately analyzes environmental impacts as a result of all phases of the Proposed Project. Judgments were made in the course of preparing the EIR about how to best present the information; however, the intent in the EIR is to provide clear information to decision-makers and the public in the most accessible format. An EIR that analyzes the impacts of interim phases of the Proposed Project, as well as full buildout, would be much longer and more complex than this EIR and would include redundant information. In general, impacts of individual phases may be less than those of the Proposed Project at buildout; however, there would be topics where impacts would be temporary but resolved and removed during later phases. This additional analysis would not make the document smaller, less complex, or easier to understand.

Response TR.26.2

The comment requests analysis of additional alternatives in the Draft EIR. See Master Response A.4, Alternatives, in Section III.A, Master Responses.

Response TR.26.3

The comment asserts that the Draft EIR, especially the appendix, contains promotional materials that do not belong in the document. Appendix B in the Draft EIR contains the proposed *Parkmerced Design Standards and Guidelines*. The proposed *Parkmerced Design Standards and Guidelines*, along with a Development Agreement, provide the specific development guidelines applicable to the entire Project Site. As stated in Chapter III, Project Description, p. III. 29, the proposed *Parkmerced Design Standards and Guidelines* are included as part of the Proposed Project and thus must be analyzed under CEQA.

The proposed *Parkmerced Design Standards and Guidelines* establish requirements for buildings, streets, open spaces, and landscaping. They are also intended to inform the design and review of specific development projects within the Project Site. The design standards in the proposed *Parkmerced Design Standards and Guidelines* also establish specific quantitative requirements for the distribution of building heights on a block-by-block basis to protect viewsheds, reduce shadows on open spaces, maintain adequate space between tall buildings, and maintain an appropriate scale in relation to the width of public rights-of-way. The design standards also

establish requirements for creating a continuous streetwall and for reducing the visual impact of off-street parking.

Overall, the proposed *Parkmerced Design Standards and Guidelines* provide the specific development guidelines that are evaluated in Section V.B, Aesthetics, in the EIR. The *Design Standards and Guidelines* are included in EIR Appendix B as they are considered part of the description of the Proposed Project and may inform impacts of the project, particularly as it relates to Aesthetics.

RESPONSE TO TR.27

Jeanne D'Arcy

Response TR.27.1

This comment expresses general support of the Proposed Project and notes that the garden apartments need to be rebuilt, not repaired, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSE TO TR.28

Jeanne Scott

Response TR.28.1

This comment expresses general support of the Proposed Project and especially notes the sustainability features, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.29

Maria-Elena Mestayer

Response TR.29.1

The comment raises concerns over the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures, citing recent media coverage of the Project Sponsor's financial condition. See Response TR.1.2 for a discussion of this issue.

Response TR.29.2

This comment expresses general opposition to the Proposed Project and suggests that the EIR present project impacts in stages. The comment does not raise any specific issues regarding the

adequacy of the EIR. See Response TR.26.1 regarding project phases and the analysis of full buildout of the Proposed Project in the EIR.

Response TR.29.3

The comment states that providing Muni service into the site is not realistic as Muni is underfunded and slow and that people would not use it. The capital funding for relocating the M Ocean View line into the Proposed Project site would be provided by the Project Sponsor. Operating costs would be funded through the City's annual budget process by revenues generated to the City by the Proposed Project, such as sales taxes, property taxes, parking fees and fines, etc. As described in Section V.E, Transportation and Circulation, pp. V.E.29-V.E.37, the new stations would be located near the Proposed Project's retail and commercial neighborhood core in order to maximize the ridership potential of transit, specifically Muni Metro light rail. The Transportation Impact Analysis Report found that the Proposed Project would increase transit ridership by approximately 500 riders during the weekday evening peak hour. Thus, moving transit closer to those new riders as proposed would appear to potentially accomplish this goal. Riders would consist of employees, visitors, and residents.

RESPONSES TO TR.30

Judith Flynn, Director, Montessori Children's Center

Response TR.30.1

The comment asserts that the Draft EIR does not mention the existing Montessori Children's Center at 80 Juan Bautista Circle or its demolition. As described in Chapter III, Project Description, p. III.16, a new 25,000-gsf Pre K-5 school and day care facility is planned southwest of the Commons area (Juan Bautista Circle) along Bucareli Drive at Gonzalez Drive. This new private school is expected to be constructed between 2016-2020, during Phase 2. As shown in Figure III.21: Proposed Phase 3 Plan, p. III.59, the existing Montessori Children's Center would be demolished between 2021-2025, during Phase 3. The development phases shown in the EIR are illustrative. The exact timing of the construction of the school and the demolition of the existing Montessori Children's Center would be determined by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response TR.30.2

The comment inquires when the existing Montessori Children's Center is scheduled for demolition. As stated above in Response TR.30.1, the existing Montessori Children's Center is proposed to be demolished between 2021-2025, during Phase 3. The development phases shown in the EIR are illustrative. The exact timing of the construction of the school and the demolition

of the existing Montessori Children's Center could be determined by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response TR.30.3

The comment inquires about air quality impacts associated with the demolition of the existing preschool.

The various environmental health issues from construction activities affecting sensitive receptors, including students and residents on the Project Site, are discussed in the EIR in Section V.F, Noise, pp. V.F.17 and V.F.20, and in Section V.G, Air Quality, pp. V.G.19-V.G.26 and V.G.35. The increased sensitivity of children at the existing Montessori Children's Center from air pollution is expected to be present on-site throughout various development phases of construction activities. Additionally, the potential health effects of various demolition activities (for example, health effects related to asbestos removal) are identified in EIR Section V.P, Hazards and Hazardous Materials, pp. V.P.10-V.P.11.

The Air Quality section of the EIR, p. V.G.24, includes a list of persons who would be most exposed to the construction-related impacts. To clearly state that students and children at the existing Montessori Children's Center and the proposed Pre K-5 school and day care facility are considered to be sensitive receptors, the following text has been added as the first item on that list:

- Children at the existing on-site private pre-school/day care facility and the proposed Pre K-5 school and day care facility, upon its completion and occupation;

Response TR.30.4

The comment inquires about health risks and air quality impacts from nearby construction and demolition activities while the school is still in operation. As stated above in Response TR.30.3, the potential public health impacts on students and residents during demolition are identified in several locations throughout the EIR.

Response TR.30.5

The comment inquires whether a new school will be built before the old one is demolished so that preschool will be present continuously. As shown in the EIR on Figure III.19: Proposed Phase 1 Plan, p. III.55; Figure III.20: Proposed Phase 2 Plan, p. III.57; Figure III.21: Proposed Phase 3 Plan, p. III.59; and Figure III.22, p. III.61, the new K-5 School and Day Care Facility is proposed to be constructed along Bucareli Drive during Phase 2 of project buildout, generally proposed to occur between 2016 and 2020. The existing Montessori Children's Center building is proposed to be demolished to be used for low- and mid-rise residential development in Phase 3 of project

buildout, generally expected to occur between 2021 and 2025, which would be after the new school is constructed. However, the development phases shown in the Draft EIR are illustrative. The exact timing of the construction of the school and the demolition of the existing Montessori Children's Center would be determined by decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response TR.30.6

The comment inquires about traffic demand at drop-off and pick-up times at the proposed new school along Bucareli Drive. Detailed provisions for school pick-up and drop-off are unknown at this time and would depend on the precise design of the facility, including location of building entrances and exits and site driveways. However, on-street parking would be provided on both sides of Bucareli Drive, and it is reasonable to assume this curb space could function as passenger loading (i.e., pick-up and drop-off) for the school, if needed.

Response TR.30.7

The comment inquires about availability of on-site parking for the proposed new school. As shown in the EIR on Figure III.17: Proposed Off-Street Parking Plan, p. III.45, there is no off-street parking proposed for the site of the new school. Consistent with the goals and objectives of the Proposed Project, which call for paid parking throughout the site, school employees and visitors who drive to the site would park in public parking lots similar to other non-residential visitors and employees at the Project Site.

Response TR.30.8

The comment indicates that the open space surrounded by Juan Bautista Circle and known as the Commons is an important recreational resource for residents, especially residents with families. The comment incorrectly identifies the development program of the Proposed Project as including the transformation of this open space into a commercial area. As discussed under the heading "Proposed Neighborhood-Serving Retail, Office and Institutional Uses" in Chapter III, Project Description, on p. III.16, this open space would not be transformed into a commercial area. The development parcels surrounding this open space however, as shown on Figure III.7: Proposed Site Plan, on p. III.19, would be redeveloped with retail, office above retail, and institutional uses. As described in the second full paragraph under the "Stormwater" heading on p. III.48 and in Section V.M, Biological Resources, on pp. V.M.20 - V.M.21, the proposed development program would include a year-round, 1.4-million-gallon-pond in the western portion of the Commons that would be designed to collect stormwater and that would support native aquatic vegetation. The EIR includes a discussion of the proposed open space configuration planned for the Project Site in Chapter III, p.III.16, and Figure III.8: Proposed Publicly Accessible Open Space, on p. III.21.

RESPONSES TO TR.31

Dan Weaver

Response TR.31.1

The comment suggests that alternative transit alignments had been proposed during community meetings that included the Muni connection to Daly City BART. Extensions of the M Ocean View south to the Daly City BART station are not proposed as part of the Proposed Project or the San Francisco Municipal Transportation Agency's Transit Effectiveness Project. Further, extension of the M Ocean View to the Daly City BART station is not needed to mitigate project-related impacts, and is therefore not included in the EIR.

Extension of the M Ocean View to the Daly City BART station may be considered among other large-scale transportation improvements in the area as part of Tier 5 of the *19th Avenue Corridor Study*. See Response TR.1.2 and Section 3.1 of Master Response A.2, Transportation and Circulation, in Section III.A, Master Responses, for additional discussion of the relationship between the Proposed Project, the EIR, extension of the M Ocean View to Daly City BART, and the *19th Avenue Corridor Study*.

Response TR.31.2

The comment suggests that it would be good to have the streetcar crossings of 19th Avenue underground, presumably to reduce conflicts between autos and transit. As described in Section V.E, Transportation and Circulation, pp. V.E.32-V.E.40, the Proposed Project includes additional vehicular capacity at new locations where light rail vehicles would cross 19th Avenue and Junipero Serra Boulevard. This additional vehicular capacity would compensate for additional delay that would otherwise be caused by creating new crossings. These improvements are included as part of the Proposed Project, rather than as mitigation measures for project impacts.

At the intersection of 19th Avenue/Holloway Drive, where the M Ocean View would cross southbound 19th Avenue enter the Proposed Project's northern side, an additional southbound travel lane has been proposed. As a result, the intersection level of service would improve and average vehicular delays would decrease compared to conditions without the Proposed Project and the light rail realignment.

Similarly, at the intersection of Junipero Serra Boulevard/19th Avenue, additional southbound and northbound lanes have been proposed. As a result of these capacity increases, despite the additional delay imparted by light rail vehicles crossing the roadway, vehicular delay would decrease with implementation of the Proposed Project compared to conditions without the Proposed Project.

Thus, the provision of new grade-separated crossings is not needed as mitigation to reduce impacts caused by the Proposed Project and is therefore not included in the analysis. However, it may be considered as part of the ongoing *19th Avenue Corridor Study* Tier 5. Refer to Master Response A.2, Transportation and Circulation, for discussion of the relationship between the Proposed Project, the DEIR, and the *19th Avenue Corridor Study*.

Response TR.31.3

The comment inquires about an alternative Muni connection along Geneva Avenue. The comment suggests that the M Ocean View could be rerouted to Geneva Avenue as an alternative to traveling through the Market Street tunnel. It is unclear from the comment what the precise routing would be and how it would eliminate the need to travel through the Market Street tunnel. However, the comment is interpreted to suggest routing from Balboa Park Station along Geneva Avenue to Bayshore Boulevard and then north along Bayshore Boulevard and Third Street to Downtown San Francisco. In this scenario, the M Ocean View would not travel west of Balboa Park Station and would not serve Parkmerced, San Francisco State University, Stonestown Galleria, or the Oceanview neighborhood, all of which are major uses in the southwest part of San Francisco. This proposal would likely have severe impacts on those uses and would reduce transit ridership by providing redundant transit service along Geneva Avenue and Third Street while leaving the major uses listed above without light rail service. This is not proposed as part of the Proposed Project, nor would it mitigate project-related impacts.

RESPONSES TO TR.32

Nan Roth

Response TR.32.1

The comment states that the Draft EIR is difficult to read. The purpose of the environmental document is to provide accurate, legible, and readily understandable information. Judgments are made in the course of preparing the EIR as to how to best present the information; however, the intent in the EIR is to provide clear information to decision-makers and the public in the most accessible format.

Response TR.32.2

The comment states that the Historic Resources Evaluation does not adequately address the value of Parkmerced as a historic resource. Please see Master Response A.1, Historic Resources, in Section III.A, Master Responses.

Response TR.32.3

The comment states that the historic cultural landscape would be easy to maintain if it were restored. Please see Master Response A.1, Historic Resources, regarding Thomas Church's involvement in the existing remaining landscaping. The existing lawn areas require substantial amounts of water compared to the native species and low-water-use plants proposed for the new landscaping. Retaining the lawns would not meet sustainability goals of reduced water use.

RESPONSES TO TR.33

John Kim

Response TR.33.1

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSES TO TR.34

Commissioner Christina R. Olague, San Francisco Planning Commission

Response TR.34.1

The comment states that Draft EIR does not sufficiently analyze consistency with San Francisco plans and policies and that the Draft EIR improperly concludes that the Proposed Project is consistent with three of the Priority Policies listed in Planning Code section 101.1. Specifically, the comment states that the Proposed Project is not consistent with Priority Policy 2: “[t]hat existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.” The comment suggests that this policy prohibits the demolition of existing housing in San Francisco. No inconsistency was found with this policy because the Proposed Project would conserve and protect more than half of the residential units currently at the Project Site (1,683 of 3,221). The comment also suggests that demolition of the remaining units at Parkmerced is inconsistent with the policy. No inconsistency is found because, under the terms of the proposed Development Agreement, the remainder of the existing units (1,538 of 3,221) would be replaced with new rent-controlled units. Please see Response TR.2.2 for further details regarding issues related to the terms of the proposed Development Agreement and displacement of existing residents.

The comment further states that the Proposed Project is inconsistent with Priority Policy 7, which states that “landmarks and historic buildings be preserved.” No inconsistency was found with this policy because Parkmerced includes no landmarked buildings. Although the EIR concludes that Parkmerced is eligible for listing on the California Register of Historic Places as a district, as

an example of a World War II era planned residential community in San Francisco, with its garden court apartments, integrated landscape features, high-rise apartment towers, and recreational amenities, no inconsistency is found with this Priority Policy because it refers specifically to the preservation of "historic buildings." The EIR concludes that none of the buildings at Parkmerced are individually eligible for the California Register of Historic Places. Therefore, the Proposed Project's demolition of buildings at Parkmerced is not found to be inconsistent with this policy. Reading the policy to say that demolition of any building found to be historically significant (even if such building is only contextually significant) is inconsistent with the policy is not consistent with the City's practice of permitting the demolition of contextually significant buildings under certain circumstances. In addition, as noted in Chapter IV, Plans and Policies, p. IV.2, no inconsistency is found because the Proposed Project would maintain all of the existing 13-story towers, and the major axial layout of the site would remain intact.

The comment also states that the Proposed Project is inconsistent with Priority Policy 8, which states that "our parks and open space and their access to sunlight and vistas be protected from development," because the Proposed Project would reduce the per capita amount of open space at Parkmerced. No inconsistency is found with this policy, because the policy does not require that a specific per capita amount of open space be provided within the City. Section V.J, Recreation, pp. V.J.7-V.J.10, describes the Proposed Project's effects on park and recreational facilities and concludes that they would be less than significant.

Response TR.34.2

The comment asks whether the Proposed Project's proposed residential parking ratio of one off-street space per residential unit is consistent with the City's Transit First Policy (San Francisco Charter Section 8A.115). The Proposed Project's design and infrastructure improvements are anticipated to improve transit access and facilities and are intended to foster transit use. The Transit First Policy provides that "travel by public transit, by bicycle and on foot must be an attractive alternative to travel by private automobile." No inconsistency was found with the Transit First Policy because the Proposed Project would permit a maximum of one off-street parking space per residential unit, which is currently the minimum amount of parking required by the "R" zoning designation that applies to the Project Site and the surrounding neighborhoods. The City has found no inconsistency with the current minimum requirement of one off street parking space per residential unit; therefore, the proposed maximum of one off-street parking space per residential unit at Parkmerced is also not inconsistent. The Project proposes to unbundle all residential parking from the sale of individual residential units, and would locate the majority of off-street parking spaces within the portion of the Project Site farthest from transit stations, which would decrease the attractiveness of driving as compared to transit use for those residents closest to transit. As a result, those units closer to transit would have an effective

parking ratio of less than one space per units, consistent with the suggestions in the comment, while the Project overall would maintain a maximum ratio of one space per unit to comply with the *General Plan*. These provisions of the Proposed Project are consistent with *General Plan* transportation policies.

Response TR.34.3

The comment is similar to Comment TR.34.1 regarding the EIR's adequacy in evaluating the Proposed Project's consistency with San Francisco plans and policies. Please see Response TR.34.1 for a discussion of the Priority Policies in Planning Code Section 101.1. Comment TR.34.3 also requests more analysis of how the loss of rent-controlled units relates to the Housing Element and housing needs in the City. As explained in Responses TR.34.1 and TR.2.2, the Proposed Project includes a proposed Development Agreement which would address the replacement of rent-controlled units currently on the Project Site. Therefore, there would be no inconsistency with existing City policies in the *San Francisco General Plan* or in other policy documents related to housing needs. Please see Response TR.2.2, for further discussion of the terms of the proposed Development Agreement and displacement of existing residents.

Response TR.34.4

The comment summarizes a need for San Francisco Planning Department guidance on how to review a CEQA document. This is not a comment on the Draft EIR, but a request for City Staff to provide guidance to the Planning Commission and the public. Chapter I, Introduction, in the EIR describes the environmental review process in Section C, pp. I.3-I.5. This text explains the public review process on pp. I.4 and I.5, and states: "In addition, readers are invited to submit written comments on the adequacy of the document, that is, whether this Draft EIR identifies and analyzes the possible environmental impacts and identifies appropriate mitigation measures. Comments are most helpful when they suggest specific alternatives and/or additional measures that would better mitigate significant environmental effects."

Planning Department staff is currently working with the Planning Commissioners to provide additional information on reviewing CEQA documents.

Response TR.34.5

The comment suggests reorganizing the Draft EIR, such as by construction phases, to make the document more understandable. See Response TR.26.1 for a discussion of this issue.

RESPONSES TO TR.35

Commissioner Michael J. Antonini, San Francisco Planning Commission

Response TR.35.1

The comment discusses the possibility for grade separation at Muni crossings on 19th Avenue, particularly where the M Ocean View line is proposed to exit from the Project Site near Junipero Serra Boulevard and 19th Avenue. The comment also suggests that the M line should operate on the west side of 19th Avenue prior to entering Holloway. Please refer to Response TR.31.1 for additional detail regarding rail crossings of 19th Avenue.

Generally, the Proposed Project includes additional travel lanes through intersections where the M Ocean View would cross 19th Avenue to restore vehicular capacity lost by allowing the crossings. At both crossing locations, 19th Avenue/Holloway and 19th Avenue/Junipero Serra Boulevard, the vehicular level of service would improve with the Proposed Project (including both the rail crossings and the additional travel lanes) compared to existing conditions without the Proposed Project.

Further, a long-term proposal to re-align the M Ocean View to the west side of 19th Avenue along its entire route may be considered as part of Tier 5 of the *19th Avenue Corridor Study*, but is not considered part of the Proposed Project nor is it necessary as a mitigation measure to reduce project-related impacts. See Master Response A.2, Transportation and Circulation, in Section III.A, Master Responses, for more discussion regarding the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

Response TR.35.2

The comment discusses the need for Muni extension to Daly City BART. See Response TR.5.3 for a discussion of the extension of the M Ocean View light rail line to Daly City BART.

Response TR.35.3

General comments regarding the overall adequacy of the Draft EIR are noted. As the comment states, pre-existing traffic conditions formed the baseline against which the traffic impacts of the Proposed Project were analyzed in Section V.E, Transportation and Circulation.

Response TR.35.4

The comment raises concerns about the socio-economic changes as a result of implementation of the Proposed Project and notes that these issues should be considered during deliberations on whether or not to approve the Proposed Project. The comment also notes that the additional residential units would generate demand for the proposed school. The EIR discusses demand for

public school facilities in Section V.L, Public Services, on pp. V.L.17-V.L.26. This analysis is conservative in that it assumes that all students new to the Project Site would go to a public school, rather than the private school proposed in the Project.

Response TR.35.5

The comment states that evaluation of the design of the Proposed Project, including design alternatives, will be considered as the project moves forward in the entitlement process, unlike increased density and increased housing that are analyzed in the EIR. This is not a comment on the Draft EIR, but a statement about the project review and entitlement process.

Response TR.35.6

The comment raises the issue of providing new rent-controlled units for existing tenants. Please see Responses TR.2.2, TR.20.2, and TR.34.1 for a discussion of this issue.

Response TR.35.7

The comment notes concerns raised in other comments about the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures, and explains that conditions of approval would be applicable to any developer of the property, not the particular project sponsor. Please see also Response TR.1.2.

Response TR.35.8

The comment addresses previous comments regarding the need for the Draft EIR to analyze the Proposed Project in phases and relocation of existing residents and states that the Draft EIR addresses the proposed phasing and relocation. Please see also Responses TR.2.2, 20.2, and 34.1 regarding displacement of residents and opportunities to relocate to new units, and Response TR.26.1 regarding reorganizing the EIR to analyze each phase of development.

RESPONSE TO TR.36

Commissioner Hisashi Sugaya, San Francisco Planning Commission

Response TR.36.1

The comment summarizes a need for San Francisco Planning Department guidance on how to review a CEQA document. This is not a comment on the Draft EIR, but a request for City Staff to provide guidance to the Planning Commission and the public. Please see Response TR.34.4.

RESPONSES TO TR.37

Commissioner Kathrin Moore, San Francisco Planning Commission

Response TR.37.1

The comment indicates that the timeframe for buildout of the Proposed Project, at 30 years, is excessively long, and suggests reorganizing the Draft EIR, by incremental phases, to have a better understanding of physical impacts in more manageable stages, rather than some very far off buildout year. The EIR analyzes the impacts of the Proposed Project assuming a 20-year time frame, not a 30-year buildout (the summary description of the Proposed Project on the Planning Commission Agenda for June 17 was in error in using 30 years). Please see Response TR.26.1 for reasons why preparing an environmental analysis for each phase has not been completed for the Proposed Project.

The comment expresses support for re-routing the M Ocean View line, but concern that over the long-time frame of development it may not occur. Although re-routing the M Ocean View into the Project Site is part of the Proposed Project, the EIR also includes an analysis of Alternative F, No Muni Realignment Alternative, in Chapter VII, Alternatives to the Proposed Project, on pp. VII.61-VII.74.

Response TR.37.2

The comment raises concerns about the displacement of residents as a result of implementation of the Proposed Project. Please see Responses TR.2.2, TR.20.2, and TR34.1.

RESPONSES TO TR.38

President Ron Miguel, San Francisco Planning Commission

Response TR.38.1

The comment summarizes a need for San Francisco Planning Department guidance or training on CEQA document review and notes the explanation of the CEQA process in the EIR Introduction. This is not a comment on the adequacy of this Draft EIR, but a request for City Staff to provide guidance. Please see Responses TR.34.4 and TR.36.1.

Response TR.38.2

The comment identifies some of the provisions of the Proposed Project that help shift from an auto-centric design to one that is more in tune with current thinking about design. This is not a specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR, and no response is necessary.

Response TR.38.3

The comment expresses concerns regarding the loss of affordable housing. Please see Response TR.20.1

Response TR.38.4

The comment notes that the Project Sponsor's financial situation is well known, but states that this is not an issue for the EIR. Please see also Response TR.1.2.

Response TR.38.5

The comment raises a concern about the 30-year timeframe for development. Please see Response TR.37.1, which notes that the EIR does not use a 30-year buildout time frame. The comment also acknowledges the connections between the financing of the retail component and the proposed transportation improvement and increased residential density, and notes that transportation improvements may be needed early in the development program. This is not a comment on the adequacy of the EIR, and no response is necessary.

Response TR.38.6

This general comment regarding the overall adequacy of the EIR is noted.

III.C WRITTEN COMMENTS AND RESPONSES

C.1 AGENCIES

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 622-5491
FAX (510) 286-5559
TTY 711



Flex your power!
Be energy efficient!

RECEIVED

JUL 23 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

June 28, 2010

SF001164
SF-1-R0.31
SCH#2009052073

Mr. Rick Cooper
Planning Department
City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, CA 94103-2479

Dear Mr. Cooper:

Parkmerced Project-- Draft Environmental Impact Report and Traffic Impact Analysis Report

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the Parkmerced Project. The following comments are based on the Draft Environmental Impact Report (DEIR) and Traffic Impact Analysis Report (TIA).

Forecasting

The TIA uses the San Francisco Guideline for vehicle occupancy rate of 1.21 for home-based work and 1.96 for non-home-based work. However, according to the Table 17, "Changes in Regional Travel Characteristics and Travel Time Expenditures in the San Francisco Bay Area: 1960-1990" by the Metropolitan Transportation Commission (MTC), the weekday average vehicle occupancy declined from 1.18 to 1.10 between 1960 and 1990. We believe the current 2010 vehicle occupancy rate should be 1.10 for home-based work during the AM and PM peak hour for the proposed project.

1.1

As a result of the adjusted vehicle occupancy rate, the DEIR and TIA significantly underestimate the number of vehicles trips generated by the proposed project in Table 23, Peak Hour Trip Generation Summary of the TIA. For example, under Project 1, the project would generate approximately 4,469 (=4,916/1.10) auto only trips during the AM peak. This is significantly greater than the 2,952 total vehicle trips used in the documents. As a result, the DEIR and TIA significantly underestimate the number of generated vehicle trips for all scenarios.

1.2

Please discuss how the transit and auto generated person trips are converted into vehicle trips.

1.3

Highway Operations

Please include the 19th Avenue/Rossmoor Drive intersection in the analysis. This intersection serves the Muni light-rail train which conflicts with the northbound movement along 19th Avenue and experiences significant delays during peak hours.

1.4

Mr. Rick Cooper/City and County of San Francisco
June 28, 2010
Page 2

In the TIA, Section 2.6, Pedestrian Circulation Improvements indicates that longer pedestrian green times are proposed for crossing 19th Avenue. It is not clear whether the intersection analysis results include the longer pedestrian crossing times.

1.5

For the project variants and sub-variants that include the proposed 4th southbound High Occupancy Toll (HOT) lane, please provide detailed operational and maintenance information. Would the lane be separated by a buffer? How would it be enforced?

1.6

In the TIA, Section 5.2.1 Traffic Impacts, Table 29, Parkmerced Project Net New Trips, the existing AM to PM peak hour trip ratio is approximately 0.92 (1,331/1,421), however the forecasted data has a new ratio of 0.65 (2,952/4,522). The net increase (3,101) in PM peak hour trips is nearly doubles the AM net increase (1,621). Please explain the significant difference between the additional AM and PM trips.

1.7

In the TIA, pages 106 to 114, five of the 11 significant impacts are located on 19th Avenue, but only one mitigation measure (weaving segment between loop on-ramp from Brotherhood Way and loop off-ramp to Brotherhood Way) has been proposed, which requires design exceptions from the Department. Please provide mitigation measures at the four remaining significantly impacted intersections. What is the impact of the northbound left-turn lanes on southbound 19th Avenue if the proposed 4th southbound lane is not provided?

1.8

In the TIA, Section 5.2.7 Construction Impacts, please provide truck route analysis and the associated traffic impacts on 19th Avenue. Project Mitigation Measure 20 does not address the impact in adequate detail. The Project Mitigation Measure 20 mentioned on page 140 states that a "construction traffic management program" will be developed by the project applicant and will "be reviewed and approved by SFMTA and DPW prior to initiation of construction." Please include the Department in the review and approval process for any part of the plan that would impact the state highway system.

1.9

Please provide a discussion of the construction impacts of the proposed new Muni light rail crossings on 19th Avenue. Please include scheduling, lane closures, etc.

Transit Improvements

In the TIA, Project Impact 12 indicates that project-related transit trips would exceed Muni's capacity utilization standard of 85 percent and that adding additional capacity would be infeasible. However, continuous inadequate transit service can potentially alter users' modal choice from transit use to passenger vehicle use. Project Impact 12 states that additional capacity cannot be added due to the limited capacity constraints in the Market Street Subway. The Department recommends that the SFMTA reevaluate the current and forecasted demand for other rail lines that use the Market Street Subway. This can potentially increase the number of M Ocean View trains by replacing trains from other lines that are underutilized.

1.10

Current transit service on 19th Avenue operates in mixed-flow traffic. Since 19th Avenue currently operates at capacity, we believe this project provides limited benefit to transit users, in particular for Routes 28 and 28L. The Department recommends the City and County explore

1.11

Mr. Rick Cooper/City and County of San Francisco
June 28, 2010
Page 3

alternatives that would enhance transit service on 19th Avenue given the foreseeable significant growth within the 19th Avenue corridor.

1.11
con't

The DEIR and TIA should discuss and examine transit connectivity between the Parkmerced Project and the rest of San Francisco. For example, the Bayview Waterfront project proposes to widen Harney Way to Geneva Avenue and would provide Bus Rapid Transit lanes from the Bayview Project to the Balboa Park BART Station. The Department recommends the City and County coordinate among all participating agencies in connecting each of these fragmented transit improvements to one another to enhance system efficiency.

1.12

How will the BART shuttle and shopper shuttle program be funded? Who will operate the shuttle program?

1.13

Regional Impact Fees

The traffic generated from the proposed project will have significant impacts to the already congested state highway system. Since reducing delays on State Route (SR) 1 will benefit the region and local jurisdictions by providing more reliable travel times for commuters, recreational travelers and freight traffic, the Department strongly urges the City and County of San Francisco to develop a regional transportation impact fee program to mitigate the impacts of future growth on regional corridors such as SR-1. Traffic impact fees are a permanent funding mechanism with a demonstrated nexus to project impacts. These fair share fees would be used to fund regional transportation programs that add capacity and/or improve efficiency to the transportation system and reduce delays while maintaining reliability on major roadways throughout the San Francisco Bay Area.

1.14

Project Study/Project Report

Due to the significant impact of the proposed project to State facilities, a Project Initiation Document is required. Please see the Department's Project Development Procedure Manual, Chapter 9, Article 8 for more details. The Manual is available at <http://www.dot.ca.gov/hq/oppd/pdpm/pdpmn.htm>.

1.15

Mitigation Monitoring

The California Environmental Quality Act (CEQA), Public Resources Code Section 21081.6 and 21081.7, requires the Department to establish mitigation monitoring submittal guidelines for public agencies. The guidelines affect agencies that have approved development projects and are required under CEQA to provide the Department reports on transportation related mitigation monitoring measures. Please see the Department's "Guidelines for Submitting Transportation Information from a Reporting or Monitoring Program to the Department of Transportation" at the following website for more information: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa.html

The Mitigation Monitoring Submittal Guidelines discuss the scope, purpose and legal requirements for mitigation monitoring reporting and submittal, specify the generic content for reports, and explain procedures for timing, certification and submittal of reports. Please complete and sign a Certification Checklist form for each approved development project that includes

1.16

Mr. Rick Cooper/City and County of San Francisco
June 28, 2010
Page 4

transportation related mitigation measures and return it to this office once the mitigation measures are approved, and again when they are completed.

Please send signed Certification Checklist forms and supporting attachments to the address at the top of this letterhead, marked ATTN: Yatman Kwan, Mail Stop #10D. For supporting attachments, the CEQA lead agency, at its discretion, may also submit the entire mitigation monitoring program report for each project with the required transportation information highlighted. When the District has approved the submittal and signed the Certification Checklist form, a copy of the form will be supplied to your agency.

1.16
con't

Should you have any questions regarding this letter, please call Yatman Kwan of my staff at (510) 622-1670.

Sincerely,



LISA CARBONI
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse, Scott Morgan
San Francisco Municipal Transportation Agency, Peter Albert
California Public Utilities Commission, Kevin Schumacher

RESPONSES TO LETTER 1

Department of Transportation, Lisa Carboni, District Branch Chief, Local Development – Intergovernmental Review, June 28, 2010

Response 1.1

The comment cites data from the Proposed Project's *Transportation Impact Analysis Report* (TIA), which formed the basis for the conclusions in Section V.E, Transportation and Circulation, of the Draft EIR.¹

The vehicle occupancies used for the transportation impact analysis were obtained from the San Francisco Planning Department's *2002 Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)*. The *SF Guidelines* provide average vehicle occupancies by trip type and by trip origin and destination, based on the *Citywide Travel Behavior Study: Employees and Employers*, conducted by the City in May 1993, and the *Visitor Travel Behavior* survey, conducted by the City in August 1993.

The surveys cited by the comment are aggregated for the entire nine-county San Francisco Bay Area. Due to the relatively high levels of congestion, scarcity and cost of parking, and availability of robust transit service (which reduces overall vehicle ownership) in San Francisco relative to many of the other eight Bay Area counties, it is reasonable that home-based work trips within San Francisco would have a higher overall vehicle occupancy than trips made outside of San Francisco. Therefore, the vehicle occupancy rates used in the TIA and the EIR analysis are appropriate.

Response 1.2

The comment states that as a result of the vehicle occupancy rates suggested in the previous comment, the TIA underestimates vehicle trips. As noted above in Response 1.1, the vehicle occupancy rates used in the analysis are more appropriate for a project in San Francisco than those suggested by the comment, and the analysis in the EIR does not underestimate vehicular traffic generation.

Response 1.3

The comment requests that the Draft EIR include a discussion of the way transit and auto-generated person trips are converted into person trips. A summary of the overall process by which person trip generation is forecasted and how person trips are assigned to individual modes,

¹ The TIA is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, in Case File 2008.0021E.

including transit and autos, is provided in the EIR in Section V.E, Transportation and Circulation, pp. V.E.41-V.E.45. See also Master Response A.2, Transportation and Circulation, in Section III.A, Master Responses.

Response 1.4

The comment requests analysis of the 19th Avenue / Rossmoor intersection in the Draft EIR. This intersection was not selected because it likely has substantially lower average delays than the intersections along 19th Avenue included in the evaluation for the following reasons:

- Only northbound traffic is affected; southbound traffic experiences no delay at this intersection.
- The M Ocean View is the only rail line that crosses the northbound traffic lanes. During the AM and PM peak periods, one train in each direction crosses 19th Avenue every 9 minutes on average, which means that northbound traffic is only disrupted every 4.5 minutes on average during the peak periods, whereas other intersections along 19th Avenue experience a “red” phase approximately every 1.5 minutes. In other words, the delay imparted to northbound traffic due to rail crossings is substantially less than that imparted at intersections with cross-traffic.
- As shown on Figure 26 in the TIA for the Proposed Project, the Proposed Project would only add approximately ten trips in the northbound direction during the AM peak hour and would not increase the northbound traffic volume during the PM peak hour.

Response 1.5

The comment questions whether the intersection analysis in Section 2.6 of the TIA includes the impact of longer “walk” times. The Proposed Project’s pedestrian improvements do not necessarily include increasing the walk times for existing crosswalks. However, the Proposed Project would include a number of new crosswalks and would convert many existing and proposed pedestrian signals from “actuated” to “pre-timed” operation, such that pedestrians are not required to push a button in order to receive a WALK indication on the signal. In all cases, the effects of converting signal operations and of installing new crosswalks are included in the intersection analysis. The intersection analysis results presented in the TIA Technical Appendix identifies the assumed crossing locations and times for both existing conditions and conditions with the Proposed Project.

Response 1.6

The comment questions how the HOT lane would be maintained and enforced. Details regarding technology and facility operations and maintenance would be developed when and if the Project Variant is approved. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for discussion of the HOT lane. As noted in the Master Response, the selection of a

particular toll collection technology will largely determine the maintenance and enforcement plan as well as the design details of such a facility, such as whether or not a buffer is provided.

However, these details are not expected to affect the analysis or conclusions presented in the Draft EIR as traffic volumes and intersection configurations are not expected to change as a result of a specific toll collection technology or enforcement and maintenance plan.

Response 1.7

The comment notes that the existing site's respective AM and PM peak hour auto trip generation counts are very similar, while the forecasted PM peak hour trip generation under conditions with the Proposed Project is substantially higher than the forecasted AM peak hour trip generation rate. This is due to the addition of up to 230,000 square feet of retail uses included in the Proposed Project. Retail uses tend to generate relatively few trips in the AM peak hour and more trips in the PM peak hour. Further, those retail uses that do generate trips in the AM peak hour tend to be more neighborhood-serving uses, which would likely not generate substantial new external vehicle trips. Therefore, the retail uses included in the Proposed Project would increase the site's PM peak hour auto trip generation much more than the AM peak hour trip generation.

Response 1.8

The comment notes that only one in five significant impacts on 19th Avenue has mitigation and requests mitigation for the other four significant impacts. Mitigation measures that increased automobile capacity were generally determined to be infeasible. Please refer to Master Response A.2, Transportation and Circulation, Sections 3.3 and 3.4, for a discussion of mitigation measures and the number of significant and unavoidable impacts due to the Proposed Project.

The comment also requests information about the impact at study intersections where new northbound left-turn lanes on 19th Avenue are proposed if the additional southbound lane is not implemented. There are two locations where new northbound left turn lanes are proposed on 19th Avenue/Junipero Serra Boulevard: Chumasero Drive and Crespi Drive. However, the Proposed Project does not propose constructing a new southbound lane on Junipero Serra Boulevard at Chumasero Drive because there are already four southbound lanes at this location. Therefore, the comment is assumed to apply only to the 19th Avenue/Crespi Drive intersection.

All scenarios involving a new northbound left turn lane from 19th Avenue into Crespi Drive include a fourth southbound lane on 19th Avenue, either serving mixed traffic or functioning as a HOT lane. Therefore, if a fourth southbound lane is determined to be infeasible, new northbound left turn access from Crespi Drive would not be included. Note also that Mitigation Measure M-TR-2A would remove the proposed northbound left-turn lane into Crespi Drive.

Response 1.9

The comment requests additional detail regarding construction truck route analysis, including associated traffic impacts due to construction traffic. The comment also requests that Caltrans be afforded the opportunity to review and approve the construction traffic management program. Section V.E, Transportation and Circulation, p.V.E.51, describes likely construction truck routes and identifies Mitigation Measure M-TR-1 to reduce the significant impacts on construction traffic (identified under Measure 20 in the TIA). Detailed construction truck routes designed to minimize effects on traffic and Muni, as well as construction schedules and lane closures, if necessary, will be defined as part of the Construction Traffic Management Program called for in this mitigation measure. The Proposed Project would obtain all required permits and approvals, including those required from Caltrans, prior to construction

Response 1.10

The comment refers to Impact 12 in the TIA, which is listed as Impact TR-12 in the Draft EIR. The comment states that Impact TR-12 notes that project would cause impacts to M Ocean View capacity, but that additional M line trains are not feasible due to tunnel capacity issues. The comment suggests increasing the number of M trains and decreasing other routes such that tunnel capacity remains the same. Please refer to Master Response A.2, Transportation and Circulation, Section 2.5.

Response 1.11

The comment states that the Proposed Project provides limited benefit to users of Muni lines 28 19th Avenue and 28L 19th Avenue Limited since 19th Avenue is at capacity, and that the City and County of San Francisco should explore alternatives to enhance transit service on 19th Avenue given foreseeable growth on 19th Avenue. The Proposed Project's impacts to these bus routes are discussed in Impact TR-24 in Section V.E, Transportation and Circulation, pp. V.E.92-V.E.93. Mitigation Measure M-TR-24 calls for implementing an exclusive or limited auto access right of way along southbound 19th Avenue, which would improve travel times for those bus routes as suggested by the comment.

It is also worth noting that a separate ongoing study, the *19th Avenue Corridor Study*, includes four tiers of improvements and recommends a fifth tier, to be conducted at a later date, that will evaluate the potential for larger-scale improvements to the area. Improvements developed and implemented as part of Tier 5 of the *19th Avenue Corridor Study* could include improvements for the 28 19th Avenue and 28L 19th Avenue Limited, among other transit lines in the area. However, these improvements are not included as mitigation measures for Proposed Project impacts because they address areawide transit issues and exceed the reasonable scope of the Proposed

Project and the EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for a discussion of the relationship between the Proposed Project and the *19th Avenue Corridor Study*. Additionally, as part of a separate project, the San Francisco Municipal Transportation Agency is currently evaluating the potential to implement Transit Signal Priority treatments along 19th Avenue to reduce the amount of traffic signal delay imparted to bus vehicles, improving both travel times and reliability.²

Response 1.12

The comment requests consideration of transit connections from Parkmerced to other areas of San Francisco, similar to those in the Bayview Waterfront Project (Shipyard Project). Transit connectivity would be enhanced by the Transit Effectiveness Project (TEP) and improvements proposed by the project. Transit improvements associated with the TEP are expected to be in place in the future and are described in terms of their frequencies, routes, and major destinations on pp. V.E.29-V.E.30. Transit improvements associated with the Proposed Project are described on pp. V.E.32-V.E.34.

The existing transit connectivity between the Project Site and other areas of San Francisco and the Bay Area was an essential component used in developing travel demand forecasts, particularly the mode share of project-generated trips. As described in the TIA Technical Appendix – Appendix J, the mode choice analysis compared travel times between the Project Site and other destinations by auto and by transit. For transit travel times, this included the effects of transfers and walk time. Generally, better transit connectivity between a particular origin/destination pair, in terms of fewer transfers and shorter walk access times to reach transit, manifested itself in higher transit mode share for project generated trips. Therefore, the travel demand forecasts associated with the TIA and the EIR already account for the nature of the existing transportation system in the study area. The transit capacity analysis examines transit capacity screenlines near the Project Site as well as other congested locations in San Francisco, such as around Downtown. Further, the level of connectivity of the existing and proposed transit system was accounted for in developing transit mode shift forecasts.

Response 1.13

The comment inquires about BART shuttle and shopper shuttle funding and operation. Please refer to Master Response A.2, Transportation and Circulation, Section 4, for discussion of funding for project improvements, including the proposed shuttles.

² Personal communication with Dustin White, Acting Muni Service Planning Manager, SFMTA, August 26, 2010.

Response 1.14

The comment notes that San Francisco should adopt a regional impact fee to fund transportation improvements. This comment makes a general policy recommendation for the City and County of San Francisco, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Although the City and County of San Francisco does not have a regional development impact fee applicable to housing, which is the primary land use associated with the Proposed Project, the City and County does fund a large number of improvements to both City-owned and state-operated facilities, including 19th Avenue (State Route 1). Funding for these improvements comes from a variety of sources including state and federal grants, tolls collected from Bay Area bridges, and a countywide ½-cent sales tax dedicated toward funding transportation improvements authorized under Proposition K.

Response 1.15

The comment notes that a Project Initiation Document must be filed due to the significant impact of the Proposed Project to state facilities. As noted in “Project Approvals,” in Chapter III, Project Description, pp. III.66-III.67, the Project Applicant and/or City and County of San Francisco will coordinate with Caltrans to obtain the appropriate approvals and provide the necessary documentation to construct the Proposed Project, including modifications to the State Highway (19th Avenue), subsequent to the Proposed Project’s approval by the City and County of San Francisco.

Response 1.16

The comment cites the procedures through which the Project’s Mitigation Monitoring and Reporting Program (MMRP) should be submitted to Caltrans. The City and County of San Francisco will comply with all applicable requirements, including those relating to coordination with Caltrans.



NATIONAL
TRUST
FOR
HISTORIC
PRESERVATION

Western
OFFICE

June 29, 2010

VIA EMAIL

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103

Re: Draft Environmental Impact Report (DEIR) for the Parkmerced Project
(SFPD File No. 2008.0021E)

Dear Mr. Wycko,

On behalf of the National Trust for Historic Preservation (National Trust) and the California Preservation Foundation (CPF), thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Proposed Parkmerced Project (Project).

The National Trust and CPF are deeply concerned about the destructive impact of the Project on the identified Parkmerced Historic District, which has been recommended eligible for the California Register of Historical Resources and the National Register of Historic Places. Parkmerced is a significant example of planned residential development, targeted at anticipated areas of population growth before and during World War II. As the work of master landscape architect Thomas Church and celebrated colleagues such as Robert Royston and Lawrence Halprin, Parkmerced is also an important component of San Francisco and California's noteworthy history of landscape design. As one of Thomas Church's largest, and few publicly accessible designs, Parkmerced is also an important community resource.

We urge the City of San Francisco to adopt Project alternatives or components of alternatives that maximize the preservation of the Parkmerced Historic District to retain its eligibility for the California Register of Historical Resources and National Register of Historic Places.

Western Office
5 Third Street, Suite 707
San Francisco, CA 94103
p 415.947.0692
f 415.947.0699
e wro@nthp.org

Serving: AK, AZ, CA, HI, ID, NV, OR, WA & the
Pacific Island Territories

California Preservation Foundation
5 Third Street, Suite 424
San Francisco, CA 94103
415.495.0349 Phone
415.495.0265 Fax
cpff@californiapreservation.org
www.californiapreservation.org

Mr. Bill Wycko
June 29, 2010
Page 2 of 7

Interests

The National Trust for Historic Preservation (National Trust) was chartered by Congress in 1949 as a private non-profit membership organization for the purpose of facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of over 190,000 members nationwide, including nearly 20,000 members in California, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The National Trust has nine regional and field offices around the country, including the Western Office in San Francisco which is responsive to preservation issues in the State of California.

The California Preservation Foundation (CPF) is the only statewide nonprofit organization dedicated to the preservation of California's diverse cultural and architectural heritage. Established in 1977, CPF works with its extensive network of 1,500 members to provide statewide leadership, advocacy and education to ensure the protection of California's diverse cultural heritage and historic places.

The National Trust and CPF have participated in a number of mandamus actions enforcing CEQA's mandate to "take all action necessary" to protect California's "historic environmental qualities." (Pub. Resources Code § 21001 (b).) Among the CEQA cases in which the National Trust and CPF have recently participated as amicus curiae are Uphold Our Heritage v. Town of Woodside (2007) 147 Cal.App.4th 587 and Preservation Action Council v. City of San Jose (2006) 141 Cal.App.4th 1336.

Requirements of the California Environmental Quality Act

CEQA reflects the statewide policy that projects with significant environmental impacts, including impacts to the State's historic environment, should not be approved "if there are feasible alternatives ... available which would substantially lessen the significant environmental effects ..." (Pub. Resources Code § 21002.) CEQA thus requires that alternatives be adopted that would "feasibly obtain most of the basic objectives of the project." (Guideline § 15126.6 subd.(a).) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (Pub. Resources Code § 21061.1.) Findings supporting the infeasibility of an alternative must be supported by "substantial evidence" based on an independent analysis by the lead agency. (Pub. Resources Code § 21081.5; Preservation Action Council, *supra*, 141 Cal. App.4th 1336.)

Any project that would demolish an historic resource necessarily has a significant effect on the environment, requiring a lead agency to study and adopt feasible alternatives such as rehabilitation, if available and practical. (Pub. Resources Code § 21081; 21084.1.) CEQA's

Mr. Bill Wycko
June 29, 2010
Page 3 of 7

requirements to identify and analyze feasible project alternatives in an EIR are of great importance when projects threaten historic resources, as is its substantive mandate that demolition not be allowed if there is indeed a feasible alternative.

Parkmerced is Protected Under CEQA as a Historic Resource

As presented in the DEIR, the Project site largely consumes the existing boundaries of the Parkmerced Historic District. The Parkmerced Historic District has been determined eligible for inclusion in the California Register of Historical Resources under Criterion 1 for its association with MetLife's nationwide effort to provide housing during and after World War II and in the development and growth of middle income housing in San Francisco. Parkmerced is also eligible for the California Register under Criterion 3 as an example of a World War II era planned residential community in San Francisco and for its association with Thomas Church, an acknowledged master in the history of American landscape design. According to the November 2009 *Historic Resource Evaluation and Cultural Landscape Assessment* for Parkmerced prepared by Page & Turnbull, the Parkmerced Historic District is also eligible for listing on the National Register of Historic Places.

The DEIR Provides an Inadequate Description of the Affected Environment

The full extent and contributing resources to the Parkmerced Historic District are inadequately identified and described in the DEIR. CEQA requires that environmental resources on the project site be adequately described in order to establish a baseline by which the project impacts can be evaluated. (Guideline § 15125.) The DEIR, however, provides no narrative description or illustration in the body of the document, or in an appendix, of the boundaries of the identified historic district or a list of contributing resources and features. The DEIR should include a both a narrative and visual representation of the district boundaries along with a boundary justification. Without such critical information it is impossible for the City and the public to understand the full extent of environmental impacts and analyze feasible project alternatives.

2.1

Proposed Impacts to Historic Resources Would be Severe

The project sponsor proposes to demolish 170 two-story buildings at Parkmerced. In addition, numerous individually-designed and highly unique landscapes that constitute shared open spaces designed by Thomas Church are scattered throughout the Parkmerced complex, each one responding to the topography and microclimate of the site. The Project would result in the demolition of every one of these landscapes. The impacts of the project would be so extreme that the only elements that would be retained are the original general street plan designed by Leonard Schultze and Associates in 1941 and the eleven mid-rise towers added to the site in 1951. If the Project were to be fully

Mr. Bill Wycko
June 29, 2010
Page 4 of 7

implemented, it would undoubtedly destroy the qualities that make Parkmerced eligible as a historic district.

The Project Alternative Analysis Indicates that an Environmentally Superior Alternatives is Feasible

As noted in the DEIR, Project alternatives proposing retention of portions of the Parkmerced Historic District result in substantially fewer impacts to analyzed resources types. Most notably, under Alternative C, Retention of the Historic District Central Core Alternative, the Parkmerced Historic District would retain eligibility for the California and the National Registers. It is also identified in the DEIR as the environmentally superior alternative. This alternative is preferable not only because it would preserve an important part of San Francisco's history, but because the reuse of existing infrastructure would result in substantially fewer emissions of greenhouse gases, making Alternative C the truly sustainable alternative (see DEIR VII.32).

Further, the DEIR fails to indicate why adoption of Alternative C is infeasible. No reasons are provided in the DEIR to justify the rejection of this alternative based on "economic, environmental, social, and technological factors." (Guideline § 15126.6(b).) CEQA requires that sufficient information about each alternative must be provided in the EIR "to allow meaningful evaluation, analysis, and comparison with the proposed project." (*Id.* at § 15126.6(d).) The reasons and facts for which the sponsor has rejected alternatives is essential information that must be provided to the public in the DEIR.¹ In contrast, this particular DEIR contains no discussion of why various alternatives are infeasible.

2.2

2.3

In order to prove economic infeasibility the applicant must provide specific "evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." Citizens of Goleta Valley v. Board of Supervisors (1988) 197 Cal. App. 3d 1167, 1181. Lower construction costs, maintenance of existing rental revenue stream, and qualification for historic rehabilitation incentives may contribute to the financial feasibility of alternatives that preserve the Parkmerced Historic District. In assessing the financial feasibility of Alternative C, the Final EIR should include a detailed accounting of projected rehabilitation costs, incorporating regulatory and tax relief available under the California Historic Building Code, the California Mills Act, the Federal Historic Rehabilitation Tax Credit Program, and conservation or preservation easement donations. Further, the economic feasibility of the Project must be evaluated in terms of current economic conditions as opposed to the conditions that existed when the project was conceived.

2.4

¹ See Laurel Heights Improvement Assn. v. Regents of the University of California (1988) 47 Cal.3d. 376, requiring preparation of a new EIR because the lead agency had failed to "explain in meaningful detail...a range of alternatives to the proposed project and, if [it] finds them to be infeasible, the reasons and facts that [it] claims support its conclusion." *Id.* at 406.

Mr. Bill Wycko
June 29, 2010
Page 5 of 7

While we support several elements of Alternative C, it is unfortunate that several sustainable solutions were omitted for no justifiable purpose. As we stated in our scoping comments dated June 19, 2009, the public should not be asked to make a choice between historic preservation and environmental sustainability. While Alternative C would result in far fewer greenhouse gas emissions, public transportation options would be sacrificed. The DEIR fails to incorporate the rerouting the Muni light rail through the Project site, citing "financial infeasibility and site constraints" (DEIR VII.22). However, the alternatives analysis references no source for this assertion and provides no meaningful explanation for why preservation of the core section of the Parkmerced Historic District precludes rerouting public transportation through the district.

2.5

Alternative C also excludes worthy Project components such as installation of renewable energy sources and on-site stormwater management features, though there is no information presented indicating that the preservation of the core of the identified Parkmerced Historic District is incompatible with the implementation of these features.

The Proposed Project is Inconsistent with the City's Master Plan Policy Goals

The DEIR improperly concludes that the Proposed Project is consistent with San Francisco's Priority Policies which are the basis of the City's Master Plan. (San Francisco City Planning Code § 101.1.) This conclusion is not supported by the facts. The City must address several direct conflicts between the Project and these Policies which form the preamble to the Master Plan. For instance, the second policy states "[t]hat existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods." (*Id.* at § 101.1(b)(2).) The DEIR states that the Project would meet this goal because 1,683 apartments would be retained. But it does not acknowledge the obvious counterpoint that 1,538 apartments would be demolished on the Project site in the next 20 years. The argument that the policy would still be met because these units would be replaced by new construction contradicts the obvious meaning of the phrase that "existing housing...be conserved." The plain meaning of this expression is that the City's goal is to protect the existing massing and the embodied energy of San Francisco's built environment *in addition* to its neighborhood character. Tearing down 1,538 housing units cannot be realistically termed conservation.

2.6

Further, one of the City's key policies is to preserve landmarks and historic buildings. (Planning Code at § 101(b)(7).) The DEIR states that Parkmerced Historic District does not qualify for such protection, however, because it "is not currently included in any federal, state or local register." (DEIR IV.1 fn1). The Planning Code is not so specific, however. Nothing in the Code indicates that protection of the City's landmarks and historic structures is in any way limited to only protecting formally listed sites on a register. The Code drafters could have made such a specific requirement, but rejected it. This narrow

Mr. Bill Wycko
June 29, 2010
Page 6 of 7

interpretation of the City policy also runs counter to CEQA, which makes no distinction between eligible and listed resources in determining what is historic.² The stark conclusion that demolition of a *recognized* historic resource is consistent with the City's policy to protect its heritage is clearly erroneous.

2.6
con't

Finally, the City Planning Code emphasizes "protection of parks and open space and their access to sunlight and vistas." (Planning Code at § 101.1(b)(8).) Currently Parkmerced contains 3,269,300 square feet of open space for 3,221 residential units, or about 1015 square feet of open space per unit. Much of the open space is shared in large outdoor spaces designed by a world class landscape architect with ample sunlight. The amount of space residents share is consistent with the basic goals of Garden City movement which was a strong influence on Parkmerced's design. The Project, in contrast, would dramatically reduce the amount of open space per resident. In the full buildout scenario 8,900 units would have access to approximately 2,964,200 feet of open space, about 333 square feet per unit. This is a net reduction in access to open space by more than 1/3. This clear inconsistency with the City's Priority Policy must be recognized.

2.7

Proposed Mitigation Measures Are Insufficient

Though the Project Sponsor would undoubtedly cause a significant and unavoidable impact to a historic resource, its proposed compensation for the loss is clearly insufficient. The sole proposed mitigation measure in the DEIR involves written and photographic documentation of the site to professional standards. (DEIR II.3-4.) Given the sheer enormity of the potential loss at stake, we believe much more should be required. In addition to the mitigation measures proposed, the National Trust and CPF recommend that the City adopt protections against preemptive demolition of any contributing elements or alteration of character-defining features of the Parkmerced Historic District, including spatial organization, circulation, topography, buildings and structures, vegetation, landscape features, and views. The mitigation measure should bar issuance of demolition permits for each phase of construction until a permanent replacement project is pending and the applicant has demonstrated the financial resources necessary to complete the proposed replacement project within a reasonable timeframe. Protection against preemptive demolition is particularly important in light of a recent news report indicating that the project sponsor is in danger of defaulting on a \$500 million mortgage.³

2.8

² Cal. Pub. Res. Code § 21084.1; "For purposes of this section, an historical resource is a resource listed in, or *determined to be eligible* for listing in, the California Register of Historical Resources" (emphasis added.)

³ Selna, Robert, Fate of S.F.'s Parkmerced complex in limbo, S.F. Chronicle, June 11, 2010 at D-1.

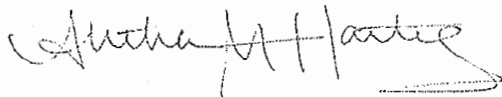
Mr. Bill Wycko
June 29, 2010
Page 7 of 7

Conclusion

Parkmerced is an important component of the landscape design and World War II heritage of the City of San Francisco and the San Francisco Bay Area, as well as one of the largest, and few publicly accessible, works by master landscape architect Thomas Church. The National Trust and California Preservation Foundation strongly urge the City to adopt Project alternatives or components of Project alternatives maximizing preservation of the Parkmerced Historic District and retaining its eligibility for the California Register of Historical Resources and National Register of Historic Places. In addition, we believe further analysis of the Proposed Project is necessary regarding its inconsistency with the City of San Francisco's Priority Policies. Finally, additional feasible mitigation measures are necessary to protect the public against the very unfortunate consequences this Project may have on the City's irreplaceable heritage.

Thank you for the opportunity to comment on the DEIR for the Parkmerced Project. Please do not hesitate to contact Brian Turner, National Trust Western Regional Attorney at (415) 947-0692 or Jennifer Gates, CPF Field Services Director at (415)495-0349 with regard to any questions related to these comments.

Sincerely,



Anthea M. Hartig, Ph.D.
Director, Western Office
National Trust for Historic Preservation



Cindy Heitzman
Executive Director
California Preservation Foundation

cc: M. Wayne Donaldson FAIA, California State Historic Preservation Officer
Charles Chase, San Francisco Historic Preservation Commission
Alex Bevk, San Francisco Architectural Heritage
Gretchen Hilyard, President, Northern California Chapter, DOCOMOMO
Charles Birnbaum, The Cultural Landscape Foundation

RESPONSES TO LETTER 2

California Preservation Foundation, Anthea M. Hartig, Ph.D, Director, Western Office, National Trust for Historic Preservation, and Cindy Heitzman, Executive Director, California Preservation Foundation, June 29, 2010

Response 2.1

The comment asserts that the Draft EIR does not provide a description of the historic district boundary or a list of contributing resources and features. Please see Master Response A.1, Historic Resources, in Section III.A, Master Responses.

Response 2.2

The comment states that the Draft EIR fails to discuss the feasibility of Alternative C. Please see Master Response A.4, Alternatives.

Response 2.3

The comment states that the Draft EIR fails to cite reasons why alternatives were found to be infeasible and rejected. Please see Master Response A.4, Alternatives.

Response 2.4

The comment asserts that the Final EIR should include a detailed financial analysis of Alternative C showing financial feasibility. Under CEQA, a financial analysis is not required in an EIR. Rather, the *CEQA Guidelines* require that any alternative evaluated in an EIR be “potentially feasible” (14 Cal. Code Regs. § 15126(a)). Financial evidence would only be required if the City explicitly finds that Alternative C is rejected because it is financially infeasible as part of its actions in approving the Proposed Project.

Response 2.5

The comment states that the Draft EIR fails to sufficiently explain why Alternative C precludes sustainability features as well as the public transit option of rerouting Muni light rail through the Project Site. Please see Master Response A.4, Alternatives.

Response 2.6

The comment states that the Draft EIR improperly concludes that the Proposed Project would be consistent with San Francisco’s Priority Policies. Please see Response TR.34.1, in Section III.B, Public Hearing Comments and Responses, for a discussion of the Proposed Project’s conformity with the Priority Policies in Section 101.1 of the San Francisco Planning Code.

Response 2.7

The comment states that the Proposed Project would substantially reduce the amount of open space per resident, and identifies the net reduction as being inconsistent with Priority Policy 8. This policy, which states that “our parks and open space and their access to sunlight and vistas be protected from development,” is applicable to parks and open space owned by the City and County of San Francisco. As described in Section V.J, Recreation, on p. V.J.5, the parks and open space on the Parkmerced site are not publicly owned recreational resources, although they are, for the most part, publicly accessible. This Priority Policy therefore does not apply to the Project Site.

The comment also characterizes the reduction of open space as a ratio of open space to the number of residential units, i.e., 1,015 square feet per residential unit [existing] and 333 square feet/unit [proposed], which overstates the actual loss of open space that would occur under the proposed development program. Under the Proposed Project, the loss of 7 acres of open space, or 305,100 square feet, would represent a 10 percent reduction in the amount of publicly accessible open space provided on the Project Site. As described in Section V.J, Recreation, on p. V.J.9, the total amount of on-site open space provided under the development program would be about 3.4 acres of open space per 1,000 residents, not including the private and semi-private open space, i.e., roof decks and balconies and interior courtyards which were not included as part of the 68 acres. Residents would also be served by improved pedestrian and bicycle connections to adjacent recreational resources, i.e., across Lake Merced Boulevard. In addition, the proposed mix of recreation facilities and open space on the Project Site, i.e., more playgrounds and new athletic fields, ponds, stream corridors, community gardens, an organic farm, and the location of the new open space and recreation facilities (shown in Figure III.8: Proposed Publicly Accessible Open Space Plan, in Chapter III, Project Description, p. III.21) would enhance recreational choices for both residents and other nearby users.

Response 2.8

The comment states that the mitigation measures for historic resources described in the Draft EIR are inadequate. Please see Master Response A.1, Historic Resources.

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION

P.O. BOX 942896
SACRAMENTO, CA 94296-0001
(916) 653-6624 Fax: (916) 653-9824
calshpo@ohp.parks.ca.gov
www.ohp.parks.ca.gov



RECEIVED

JUL 17 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

July 9, 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103

Draft Environmental Impact Report (DEIR) for the Parkmerced Project

Dear Mr. Wycko:

The State Office of Historic Preservation (OHP) has broad responsibility for the implementation of federal and state historic preservation programs in California. We thank you for the opportunity to comment on the above Draft Environmental Impact Report (DEIR) for the Parkmerced Project issued under the California Environmental Quality Act (CEQA). We are concerned that the proposed project will have an irreversible significant adverse effect on a historic resource and that the proposed mitigation measures do not sufficiently mitigate the loss of Parkmerced's historic resources and integrity.

Pursuant to CEQA a lead agency must determine whether a project may cause a substantial adverse change in the significance of a historical resource or cultural resource (CEQA Guidelines § 15064.5). Although Parkmerced is not included in any listings of historical resources, "the fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1."

As the Lead Agency, the City of San Francisco, through its consultant Page & Turnbull, has determined that, "Parkmerced is eligible for inclusion in the California Register of Historical Resources (CRHR) as a historic district under Criterion 1 (Events) and Criterion 3 (Design/Construction) with a period of significance from 1941 to 1951. Most of the features at Parkmerced retain integrity from MetLife's period of ownership and together the buildings, landscapes, and associated features of Parkmerced reflect the original design and functionality of this planned residential community." It is also important to note that Parkmerced is the work of renowned master landscape architect Thomas Church and his associates, Robert Ryston and Lawrence Halprin.

The DEIR states that the "proposed demolition of the existing garden apartments and removal of existing landscape features on the Project Site would impair the historical

Mr. Bill Wycko
July 9, 2010
Page 2

significance of the Parkmerced historic district historical resource.” This proposed demolition includes all of the 170 garden style buildings in the project area along with most or all of the historic landscape features. The proposed demolition would clearly cause, “Substantial adverse change in the significance of an historical resource [which] means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” (CEQA Guidelines § 15064.5 (b) (1)). The California Appellate courts have held that such a demolition is an adverse impact that cannot be mitigated below a level of significance. League for Protection of Oakland’s Architectural and Historical Resources v. City of Oakland (1st Dist. 1997) 52 Cal. App. 4th 896 [60 Cal. Rptr. 2d 821].

The DEIR simply proposes mitigation of this wholesale demolition through documentation adhering to the National Park Services (NPS) Historic American Building Survey (HABS) and Historic American Engineering Report (HAER) standards. However, such HABS/HAER documentation does not reduce the irreversible significant impact on the Parkmerced resource or in any way mitigate such a devastating alteration to a historic district. As stated in the CEQA Guidelines 15126.4 (b) (2), “In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur.” We strongly argue that the proposed demolition of the Parkmerced resources is indeed a circumstance in which HABS/HAER documentation is clearly insufficient mitigation in relation to the significant adverse effect that wholesale demolition would have on Parkmerced’s historic resources and the historic district’s integrity.

3.1

It is our position that the Lead Agency should adopt an alternative that would preserve the garden apartments and the defining landscape resources thus retaining the integrity of the Parkmerced historic district. For instance, the DEIR includes Alternative C (RETENTION OF THE HISTORIC DISTRICT CENTRAL CORE ALTERNATIVE). The DEIR states that this option “would retain the essential portions, features and characteristics of the Parkmerced historical resource that justify its eligibility for inclusion within the CRHR as an historic district.” Unfortunately, the DEIR does not include any arguments to justify the rejection of Alternative C. Under CEQA Statute § 21002 “The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” Since the DEIR does not contain arguments to the contrary, Alternative C clearly provides the Lead Agency with a feasible alternative that would substantially lessen the adverse effects of the project on historic resources.


3.2

We thank you for the opportunity to comment on the above project. Please understand that our comments herein are specifically related to the environmental review process and adequacy of documents prepared for the environmental review purposes. We do not take positions in support of or against projects, but rather focus on the environmental review process itself.

Mr. Bill Wycko
July 9, 2010
Page 3

If you have any further questions, please don't hesitate to contact Ronald Parsons, Historian I, CEQA Coordinator Local Government Unit at (916) 653-5099 or at rparsons@parks.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Milford Wayne Donaldson". The signature is written in a cursive style with some vertical lines above the main text.

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

Cc: Tina Tam, San Francisco Preservation Coordinator
Anthea Hartig, Director, Western Office, National Trust for Historic Preservation
Cindy Heitzman, Executive Director, California Preservation Foundation

RESPONSES TO LETTER 3

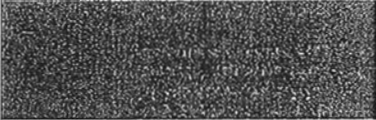
**Office of Historic Preservation, Milford Wayne Donaldson, FAIA,
State Historic Preservation Officer, July 9, 2010**

Response 3.1

The comment states that the HABS/HAER documentation described in the Draft EIR is inadequate mitigation for demolition of the Parkmerced historic district. It is agreed that HABS/HAER documentation would not reduce the significant impact of demolition to a less-than-significant level, and the impact would remain significant and unavoidable, as stated on pp.V.D.27-V.D.28. Please also see Master Response A.1, Historic Resources, in Section III.A, Master Responses.

Response 3.2

The comment expresses support for Alternative C and states that the Draft EIR fails to cite the reasons why Alternative C was rejected. Please see Master Response A.4, Alternatives, for a discussion of the decision-making process and findings related to alternatives.



July 12, 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Subject: Parkmerced Project Draft Environmental Impact Report, dated May 12, 2010

Dear Mr. Wycko:

The Transportation Authority has conducted a review of the above-referenced project draft Environmental Impact Report (DEIR) and offers the following comments.

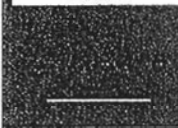
The proposed project reflects strong Transit-oriented design (TOD) and sustainable design features and would provide much-needed housing and mixed use development to the southwest part of the City. We support the project's focus on affordable housing and sustainable travel, including capital improvements to the M-Oceanview light rail transit line, a transportation demand management program, on- and off-site pedestrian improvements, and a bicycle-sharing system.

One aspect of the project on which we would like to coordinate further is the proposed addition of a fourth southbound lane for 19th Avenue. We understand that the additional travel lane is intended to counteract the loss of vehicle capacity caused by introducing a new light rail crossing at 19th Avenue and Holloway Avenue into the project site. We further understand that buses along 19th Avenue would also feel the effects of intersection delays at this location.

However, the expansion of vehicular capacity at this location is not an ideal way to implement the City's Transit First strategy and is not consistent with the Authority's goals for multi-modal improvements along the corridor. We are particularly concerned about the effect of this lane addition on pedestrian conditions. Our hope is that through further collaboration this summer and in the coming year, we can collectively identify an alternate design that would preserve the current roadway geometry at this location, while still realizing the vision of the direct light rail connection to the project site.

To this end, we wish to partner with city agencies and private stakeholders to identify solutions that work better for multiple travel modes. As we have discussed with the Municipal Transportation Agency and the project sponsor, we are interested in further exploring network changes that could be made to other parts of the overall transportation system to address delays to buses and other vehicles that do not involve expanding the number of travel lanes. Some are small, low-cost changes that can improve transit travel times and operating conditions, or vehicular travel conditions, on a corridor basis. Others are larger, higher-cost capital projects that would require multi-stakeholder or even regional participation. In fact, we understand that the San Francisco Planning Department's 19th Avenue Corridor Study identifies what are being termed "Tier 5" improvements that involve grade separating the light rail crossings of 19th Avenue and could potentially involve a westerly alignment along southbound 19th Avenue, with benefits to Parkmerced as well as

4.1



4.2

4.3



4.4

the San Francisco State and Stonestown communities. We ask that the project sponsor's participation in this study be included in the project's mitigation plan and Developer Agreement.

4.4
cont

We also encourage consideration of a residential Eco-pass for the project, similar to what is included in the Candlestick Point/Hunters Point-Shipyard project transportation plan. This Eco-pass should consider the economics of the Parkmerced market; a supporting program of dedicated variable parking surcharge (user fee) revenues may be an appropriate cost-sharing feature of such a program. Again, the Candlestick/HPS project provides a model for this type of benefit district concept.

4.5

We would like to collaborate via an additional long-range, regional corridor planning effort to identify alternative solutions, determine funding, and initiate implementation steps, including through coordination with the State Department of Transportation (Caltrans), which retains design jurisdiction over this state route. We propose collaboration to produce the required Caltrans documentation, including the Project Study Report and Project Report; local agreement on a preferred project will facilitate the Caltrans approval process.

4.6

Because the broader, long-range solutions have not yet been considered, the City should preserve flexibility to redirect the project's committed transportation investment to either a set of lower-cost strategies such as those described in the March 2008 memo of potential system-wide mitigation measures, or toward a regional program of higher-cost strategies. It may be that more desirable solutions can be found, in which case it will be important for project approval documents, such as the Developer Agreement and Infrastructure Plan, to ensure that the City retains some flexibility in how to direct the project's financial commitments for transportation investment. This flexibility could be provided within the EIR's transportation impact mitigations as well as within the accompanying land use approval documentation.

4.7

Finally, we note that the High-Occupancy Toll (HOT) lane concept analyzed in the EIR represents an important potential tool for addressing congestion, but we believe the approach proposed – a priced lane segment in a single direction for only a small stretch of the corridor – to be impractical for implementation, especially if done in isolation. The Authority continues to evaluate the feasibility of a broader system of road pricing in its Mobility, Access and Pricing Study and believes this more comprehensive approach to be a more optimal way to implement this important congestion solution.

4.8

Thank you for the opportunity to provide comment; we look forward to collaborating further on transportation improvements in the 19th Avenue corridor and broader project area.

Sincerely,



Tilly Chang
Deputy Director for Planning

cc: V. Wise, G. Riessen,
P. Albert, J. Kirschbaum, T. Papandreou, R. Olea – Municipal Transportation Agency
JLM, MEL, AL, BC, ES, CF – Chron, File: ParkMerced

RESPONSES TO LETTER 4

San Francisco County Transportation Authority (SFCTA), Tilly Chang, Deputy Director for Planning, July 12, 2010

Response 4.1

The comment generally expresses support for project features designed to encourage transit use and other sustainable travel through mixed-use, higher density development, and the extension of the M Ocean View light rail line into the Project Site. The comment does not raise issues related to the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 4.2

The comment states that the San Francisco County Transportation Authority would like to coordinate on efforts related to the proposed fourth southbound lane for 19th Avenue. As noted in the comment, the fourth southbound travel lane proposed for 19th Avenue as part of the Proposed Project is intended to compensate for additional delay imparted to autos and buses on 19th Avenue by relocating the M Ocean View line into Parkmerced. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, which discusses the purpose of the additional travel lane on southbound 19th Avenue and the potential for other improvements to be implemented through Tier 5 of the *19th Avenue Corridor Study* that may replace the need for the additional lane.

Response 4.3

The comment states that expansion of vehicular capacity at the 19th Avenue and Holloway crossing is undesirable. Please see Response 4.2, above, and Master Response A.2, Transportation and Circulation, Section 3.1, for a discussion of this issue.

Response 4.4

The comment states that the San Francisco County Transportation Authority would like to explore other network changes that could be made instead of new travel lanes. The comment notes that these changes and/or additional improvements could be contemplated as part of Tier 5 improvements from the *19th Avenue Corridor Study*. The comment also suggests that the project sponsor's participation in the *19th Avenue Corridor Study* should be included in the Development Agreement. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for a discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*. If future recommendations from Tier 5 of the *19th Avenue Corridor Study* conflict with elements of the Proposed Project or mitigation measures adopted as part of the EIR, funds for project improvements and/or mitigation measures could instead be used for Tier 5

Responses to Letter 4. San Francisco County Transportation Authority

recommendations, provided the appropriate environmental review is conducted to determine whether those alternative recommendations would cause any new significant environmental impacts or would exacerbate significant impacts already identified as part of this EIR.

Response 4.5

The comment requests an EcoPass program, similar to the program for the Candlestick Point/Hunters Point Shipyard Project, be developed for the Proposed Project. The Proposed Project includes a subsidy of approximately \$20 per month per household for use on area transit systems. The bulleted list of Transportation Demand Measures proposed by the Project shown on pp. V.E.38-V.E.40 has been revised as follows:

- Transit passes and SFMTA parking cards would be available on-site. In addition, rental fees and association dues would include a subsidy to transit service. This would provide a steady funding stream for transit service and a “self-selection” incentive – whereby residents who are more inclined to use transit would be attracted to live in the Project Site.

Response 4.6

The comment states that the San Francisco County Transportation Authority would like to collaborate on an additional long-range regional corridor planning effort. This comment does not relate to the adequacy of the Draft EIR, but suggests collaboration between local agencies on the 19th Avenue Corridor Study.

Response 4.7

The comment states that the City and County of San Francisco should preserve flexibility to redirect committed transportation investment to either a set of lower-cost strategies or a regional program of higher-cost strategies. The EIR evaluates the impacts of the Proposed Project, recommends mitigation measures to reduce the magnitude of the project’s significant impacts, and describes potential secondary impacts associated with recommended mitigation measures. If other improvements are identified at a later date that are deemed more desirable than the improvements described in the EIR, subsequent environmental review would be required to demonstrate the effectiveness of those measures and disclose any impacts they may create. Therefore, while the Proposed Project and the EIR do not preclude changes to the Proposed Project or recommended mitigation measures, such changes could only be made following completion of the appropriate environmental review.

Responses to Letter 4. San Francisco County Transportation Authority

Response 4.8

The comment states that the HOT lane analyzed will be impractical from an implementation perspective, especially if done in isolation. Details regarding technology, and facility operations and maintenance would be developed when and if the Project Variant is approved. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for discussion of the HOT lane.



SAN FRANCISCO PLANNING DEPARTMENT

Letter 5

MEMO

DATE: July 17, 2010

TO: Mr. Bill Wycko, Environmental Review Officer

FROM: Historic Preservation Commission

CC: Linda Avery, Historic Preservation Commission Secretary
Timothy Frye, Acting Preservation Coordinator
Rick Cooper, Senior Environmental Planner

RE: Review & Comment of DEIR, Case # 2008.0021E – Parkmerced

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

Reception:
415.558.6378

Fax:
415.558.6409

Planning
Information:
415.558.6377

The HPC appreciates the opportunity to participate in review of this environmental document. On June 2, 2010, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed long-term mixed-use program for Parkmerced. After discussion, the HPC arrived at the comments below:

EVALUATION & IMPACTS

- There appears to be a major deficient in the manner in which the DEIR is written in that it makes a huge leap in justifying a basis for the alternatives before completing an adequate evaluation and justification for the potential historic district. There needs to be more background information from the sub-consultants because it is not clear in the Historic Resource Evaluation what encompasses the potential historic district and defines its boundaries. 5.1
- The HPC concurs that Parkmerced is eligible for the National Register and California Register under criteria 1/A and 3/C as described in Page & Turnbull Historic Resources Evaluation and that the proposed project poses a significant unavoidable impact, individually and cumulatively, that cannot be mitigated to a less-than-significant level. 5.2
- The historic purpose of Parkmerced was to provide affordable middle-class rental housing. The social significance of project was not discussed sufficiently in the DEIR and the DEIR does not adequately represent the true loss of the site, which is the elimination of a historic rental community.
- The proposed project's sustainability goals are laudable, but it is worth pointing out that demolishing a few thousand units and 170 buildings has a major negative environmental impact and is not sustainable development. In addition, there is a concern that the attraction of promoting sustainable building practices is being used as an excuse to displace affordable rental housing 5.3
- Cumulative Impacts regarding Thomas Church Design: Given the loss of so many large scale housing projects where the landscape was designed by Thomas Church, there may be a cumulative impact to his works of large-scale landscape architecture planning considering that Valencia Gardens and the Defense Workers Housing project in Vallejo, 5.4

California are no longer extant. This potential cumulative impact should be addressed in the DEIR.

5.4
con't

ALTERNATIVES

- The alternatives section lacked an alternative that preserved a significant representation of the Parkmerced development while also adding new construction and energy/sustainable provisions. What could be done within these alternatives? What areas could be called out for preservation and could mitigate the loss of the bulk of the fabric? Alternative C appears to be the strongest of the alternatives provided, but it is significantly lacking. Alternative C should be further developed and used as a model to preserve some of the site and meet the substantiality provisions of the Project Sponsor's objectives.

5.5

MITIGATION MEASURES

- Mitigation Measure M-CR-1:
 - Because the site is significant in part for its landscape architecture, the focus for documentation should not be only on the architecture. An historical landscape architect should provide guidelines for the HABS, HALS documentation of the site, specifying how the landscape documentation should be conducted. Any significant trees on the site should be considered for inclusion in the documentation.
 - The HABS documentation should be reviewed and approved by either the Planning Department's Preservation Coordinator or the HPC, prior to the granting of a demolition permit.
 - Documentation and public interpretation of the site's history should be conducted and written by an historian meeting the Secretary of the Interior professional qualification standards and in consultation with an exhibit designer. The interpretation should be placed in at least one prominent public setting and shall be of a permanent quality. The content, display design shall be reviewed and approved by the Planning Department's Preservation Coordinator or the HPC prior to the issuance of an occupancy permit.
 - The Thomas Church materials referred to in the DEIR that are in the Maintenance Shed at Parkmerced should be donated to the Church archives at U.C. Berkeley where Church's archives are located.
 - Consideration should be given to designating significant trees remaining on the site that qualify for designation.

5.6

RESPONSES TO LETTER 5

**San Francisco Planning Department, Historic Preservation Commission,
July 17, 2010**

Response 5.1

The comment asserts that the potential historic district is not adequately defined and described. Please see Master Response A.1, Historic Resources, in Section III.A, Master Responses.

Response 5.2

The comment states that the social significance of the original Parkmerced development is not adequately discussed in the Draft EIR. Please see Master Response A.1, Historic Resources.

Response 5.3

This comment asserts that the demolition of existing units is at odds with the Proposed Project's sustainability objectives and measures, and that there is a concern that promoting sustainable building practices is being used as a way to displace affordable rental housing. For a discussion of the displacement of residents, please see Response TR.2.2, in Section III.B, Public Hearing Comments and Responses. For a discussion of the loss of rental units, please see Response TR.20.2. For a discussion of the demolition and sustainability, please see Response TR.25.6.

Response 5.4

The comment states that the Draft EIR fails to address cumulative impacts regarding the loss of large-scale development projects designed by Thomas Church. Please see Master Response A.1, Historic Resources.

Response 5.5

The comment states that Alternative C should be further developed to encompass both site preservation and new construction and energy/sustainable provisions. Please see Master Response A.4, Alternatives.

Response 5.6

The comment provides modification to the mitigation measures provided in the Draft EIR. Please see Master Response A.1, Historic Resources.

The comment also states that consideration should be given to designating eligible trees remaining on the Project Site as significant trees, but does not raise any specific comment on the

III. Comments and Responses
C. Written Comments and Responses
C.1 Agencies

Responses to Letter 5. San Francisco Planning Department

Draft EIR. Professional arborists do not typically nominate trees for landmark status since their task is to inventory and describe trees based on applicable ordinances; members of the public wishing to nominate a tree that is not on his or her property must get support from at least one authorized nominator from the Board of Supervisors, Planning Commission, Historic Preservation Commission, heads of City departments, agencies, or the property owner. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

C.2 ORGANIZATIONS



SAN FRANCISCO
PLANNING + URBAN RESEARCH
ASSOCIATION

654 Mission Street
San Francisco, California
94105

415.781.8726 t
415.781.7291 f

www.spur.org

Co-Chairs
Andy Barnes
Linda Jo Fitz

Executive Director
Gabriel Metcalf

Urban Center Director
Diane Filippi

Vice Chairs
Lisa Feldstein
Mary McCue
ToniQuia Moss
Bill Rosetti
Jim Salinas, Sr.
Lydia Tan

Treasurer
Bob Gamble

Secretary
Jean Fraser

Immediate Past Chair
Tom Hart

Advisory Council
Co-Chairs
Michael Alexander
Paul Sedway

Board Members
Jim Andrew Jr.
Carl Anthony
David Baker
Fred Blackwell
Lee Blitch
Margo Bradish
Larry Burnett
Michaela Cassidy
Charmaine Curtis
Gia Daniller
Oscar De La Torre
Kelly Dearman
Shelley Doran
Oz Erickson
Norman Fong
David Friedman
Gillian Gillett
Chris Gruwell
Anne Halsted
Dave Hartley
Mary Huss
Chris Iglesias
Laurie Johnson
Ken Kirkey
Travis Kiyota
Patricia Klitgaard
Florence Kong
Rik Kunnath
Ellen Lou
Janis MacKenzie
John Madden
Jacinta McCann
John McNulty
Chris Meany
Ezra Mersey
Leroy Morshita
Mary Murphy
Paul Okamoto
Brad Paul
Chris Poland
Teresa Rea
Byron Rhett
Victor Seeto
Elizabeth (Libby) Seifel
Chi-Hsin Shao
Raphael Sperry
Bill Stotter
Stuart Sunshine
Michael Teitz
Michael Thériault
Will Travis
V. Fei Tsen
Jeff Tumlin
Steve Vettel
Debra Walker
Brooks Walker, III
Cynthia Wilusz-Lovell

27 May 2010

Mr. Bert Polacci
Parkmerced
3711 Nineteenth Avenue
San Francisco, CA 94132

Re: Proposed Redevelopment of Parkmerced

Dear Mr. Polacci:

On behalf of the members of the SPUR Project Review Committee, we would like to thank your team for bringing the proposed redevelopment of Parkmerced to our group for consideration and review at our April 2010 meeting and for hosting a site tour in May.

The mission of the SPUR Project Review Committee is to consider projects that are of citywide importance and to evaluate them according to criteria related to land use, public realm interface, building design and environmental effects. In all cases, we are seeking a combination of excellent planning and design solutions that will ensure the positive contribution of each project to a safe, visually appealing, and vibrant urban setting for the people who live and work in San Francisco.

In general, after our review and discussion, the committee remains supportive of about the proposed complete redevelopment of this very large and significant residential site on the City's west side. Understanding that the design is still in its early stages, we provide the following specific comments for your information and action:

Land Use

Built in the late 1940s and early 1950s by Metropolitan Life Insurance Company partly to meet the housing needs of returning WWII veterans and their families, the original Parkmerced development was designed for the sensibilities of the times: auto-centric street patterns isolated from the rest of the city grid, thirsty suburban-like lawns, and too few "eyes on the street" to promote street life and community. Construction shortcuts due to post-war materials shortages have resulted in rapidly deteriorating buildings throughout much of the site.

The proposed redevelopment plan will add over 5,600 units to the existing 3,221 on the 155-acre site. An as yet undetermined percentage of the units will be available for sale, though the project sponsor indicates the majority will remain rental units. The existing 12-story tower buildings will be upgraded, while the 2-story courtyard buildings will be demolished and replaced with four- and five-story (45-65 ft) and mid-rise (85-145 ft) buildings. Phasing over the course of 20 years will allow current tenants to be moved only once. Existing rent control will remain in place for current tenants, who will receive new apartments.

RECEIVED AT CFC HEARINGS

6-17-10
2004-0021E
(R. COOPER)

Parkmerced is introducing a mixed-use corridor on Crespi Street that will host approximately 200,000 sf of neighborhood serving retail, daycare services, and 90,000 sf professional office spaces. There is a possibility of “live-work” units to be located near the social commons areas.

In addition, Parkmerced will be funding the re-routing of the Muni M-line into the complex during Phase 2 of the project. The new stop will be located at a plaza on a dedicated transit street, thereby replacing the very dangerous SFSU transit stop across Nineteenth Avenue at Holloway Avenue. The new alignment sets the stage for an eventual connection of the M-line to the Daly City BART station and allows for more efficient operation of the M-line.

The committee is in favor of this proposed urbanization of the Parkmerced site. The increase in density on the west side of San Francisco, the very visible commitment to public transit, and the recognition of the need for neighborhood-serving retail and professional service businesses are very much in line with SPUR’s community building principles. We also appreciate the trade-offs inherent in redeveloping a site of this size and complexity, trying to redress the now-apparent mistakes of the past.

6.1

Keeping this in mind, we would urge the sponsor to explore more mixed-use areas in the western expanses of the site, especially in light of the residential densification of these areas. We are not convinced that the four retail/community spaces shown sprinkled among the housing in the western reaches of the site will have much impact on strengthening a sense of community. This becomes more important in light of the factors that discourage walking: the windy nature of the area, and its distance from the main commercial area on Crespi Street, and anticipated use of the shuttle vehicles to reach it. We would also like to more fully understand what steps are being taken to ensure the retail corridor achieves success. Flexible design allowing for the possibility of expanded commercial use throughout the site should be a consideration.

6.2

Public Realm Interface and the Promotion of a Pedestrian-Oriented Environment

A good deal of the redevelopment is focused on creating a more pedestrian- and bike-friendly environment. New streets are being added to shorten block lengths, paseos are being added for pedestrian only use, and dedicated bike lanes are being added to various through streets.

The project sponsor is also introducing a number of features to promote public transit use at Parkmerced: funding the re-routing of the Muni M-line into the complex, adding a zero-emission shuttle service within the complex and to Daly City BART, giving residents “mobility cards” – discount transit passes – and employing a fulltime transportation coordinator. The committee is strongly supportive of bringing MUNI into the complex, and sees this move as a critical element in both reintegrating Parkmerced into the city and creating a transit-friendly development. We would like to see this work done in Phase I, but if it is to be delayed to Phase II of the development, strong conditions of approval should be in place to ensure that this work occurs.

6.3

The committee is very impressed with the level of commitment the project sponsor has shown to following recommendations of the Better Streets Plan. We believe the addition of a commercial mix of uses along Crespi Street, as well as the proposed orientation of the residential units to more directly interface with the streets, will add to a positive public realm experience. Again, we ask that the project sponsor consider flexible design to encourage the healthy, unforeseen evolution of uses in the neighborhood over time.

6.4

We appreciate the efforts to connect the site to the rest of the city. We anticipate the move from an auto-centric site to a transit-oriented plan for such a large parcel will set a welcome example for other large developments in San Francisco.

Building & Landscape Design

Though still in early stages of building design, in general the committee favors the plan for four- and five-story and additional mid-rise buildings distributed throughout the site. The committee understands that the high-rise buildings are being retained to maximize density (which we support), and because they are still in serviceable condition and more cost effective to renovate than replace (understandable, but less compelling from an urban planning standpoint). We would like to stress that it will be crucial to the success of the redevelopment project that a strong mix of architectural design be employed. We are also interested to hear more about any additional life safety and energy efficiency measures planned for the existing high-rise buildings as they are incorporated into the redevelopment.

6.5

6.6

The redevelopment plan calls for narrower streets with a consolidation of public open space while retaining some of the more private courtyard space throughout the site. Windbreaks, native plant landscaping, and an organic farm to be developed on the southern edge of the site are welcome features which the committee supports.

6.7

Environmental Effects

SPUR believes it is essential for projects to build environmental sustainability into their design and function, and we encourage exploration of all avenues for achieving the highest level of sustainability at the earliest possible date. We are impressed with the efforts made by the project sponsor in converting this 60-year-old site into a model of sustainability through the LEED ND classification, and with doing so in the early stages of the project.

6.8

We applaud the creative plans for a water conservation and filtration system that will affect not only the Parkmerced site but also replenish the water level of Lake Merced. We look forward to learning more about the plans for energy co-generation, the proposed organic farm, and other innovations in sustainability.

6.9

Conclusion

The SPUR Project Review Committee generally finds the proposed project at Parkmerced to be an appropriate redesign of this expansive site and we encourage the project sponsor to use this incredible opportunity to make this a model new development by paying special attention to the public realm interface and by promoting a vibrant community throughout the entire site. We welcome the increased residential density, improved social interface and the elaborate plans for an environmentally sustainable community on the city's west side. We are very pleased with the efforts made to engage the MTA and SFSU in the planning process.

6.10

We thank you for committing your time and resources to the presentation at SPUR, appreciate the fact that you have presented your proposal to us at an early stage in its development so that you may take our recommendations into consideration. We will follow further refinements of this project with great interest and invite you to keep us informed on its progress.

Consideration for Endorsement

Should you intend to request SPUR to consider this project for endorsement, you should contact the Committee co-chairs at the appropriate time. Endorsement by SPUR is reserved for projects of the highest quality and significance to the city. Consideration for endorsement begins with a formal response by projects sponsors to this review letter, including an update on any significant changes to the project program or design since the project was initially presented at SPUR. The project is then taken up for discussion by an endorsement subcommittee of SPUR board members who serve on committees in the areas of project review, urban policy, housing, sustainability, and transportation. We normally require a month's lead-time to schedule a meeting of the endorsement subcommittee.

Please do not hesitate to contact us for questions/clarifications.

Sincerely,

Charmaine Curtis
SPUR Project Review Committee Co-Chairs

Mary Beth Sanders

Reuben Schwartz

cc: SPUR Board of Directors

RESPONSES TO LETTER 6

San Francisco Planning + Urban Research Association, Charmaine Curtis, Mary Beth Sanders, Reuben Schwartz, SPUR Project Review Committee Co-Chairs, May 27, 2010

Response 6.1

This comment expresses general support for the Proposed Project, stating that the increase in density on the west side of San Francisco, the commitment to public transit, and the recognition of the need for neighborhood-serving retail and professional service business are in line with SPUR's community building principles. Refer to Response TR.9.1 in Section III.B, Public Hearing Comments and Responses.

Response 6.2

The comment suggests providing additional mixed-use areas on the western portion of the Project Site to ensure the retail corridor achieves success, and providing for flexible design to allow for expanded commercial use throughout the Site. This comment does not address the adequacy or accuracy of the analysis presented in the EIR. The request to provide more mixed-use areas on the western portion of the Project Site and/or expanded commercial use throughout the Site may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 6.3

The comment expresses support for rerouting the M Ocean View light rail line through the Project Site, but suggests that this occur during Phase 1 rather than Phase 2. This is a comment on the specifics of the development proposal, and therefore is not a comment on the Draft EIR. Phasing of the various project components, including transit and infrastructure improvements, is described in Chapter III, Project Description, pp. III.54-III.65.

Response 6.4

The comment expresses support for the addition of commercial uses along Crespi Drive and the proposed orientation of the residential units to more directly interface with the streets. This comment does not address the adequacy or accuracy of the analysis presented in the EIR. This comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 6.5

The comment stresses the importance of having a strong mix of architectural design throughout the Project Site. As stated in Section V.B, Aesthetics, p. V.B.24, the Proposed Project calls for the use of a consistent design vocabulary intended to provide the Parkmerced neighborhood with a modern design aesthetic, and provide for visual variety and interest while promoting a cohesive visual identity for the neighborhood. The proposed *Parkmerced Design Standards and Guidelines* call for use of high-quality durable materials and modulation and articulation in buildings to provide human scale, depth, and visual variety and interest. Guidelines for commercial street frontages are intended to promote an active and inviting pedestrian-oriented commercial environment at the ground floor. They would establish specific quantitative requirements for the distribution of building heights on a block-by-block basis to protect viewsheds, to minimize shadows on open spaces, to maintain adequate space between tall buildings, and to maintain an appropriate scale in relation to the width of public rights of way.

Response 6.6

The comment expresses interest in obtaining information on life safety and energy efficiency measures planned for the existing tower buildings. All 11 existing 13-story tower buildings (130 feet tall) would be retained as part of the Proposed Project. According to the Project Sponsor, over the past five years, the Sponsor has replaced fire and life safety systems, provided new emergency generators, elevator modernization and related safety improvements, and performed cosmetic upgrades to the existing towers, such as entryway remodeling and interior lighting upgrades. The Project Sponsor is considering energy efficiency upgrades for the towers; however, details of those upgrades have not been finalized yet; therefore they have not been evaluated in the context of the EIR. The Proposed Project does not include any seismic improvements or changes to the existing towers. For more information regarding seismic safety of the existing towers, please see Master Response A.3, Seismic Hazards, in Section III.A, Master Responses.

Response 6.7

This comment expresses general support of the Proposed Project, specifically the incorporation native planting, windbreaks, and an organic farm. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 6.8

This comment expresses general support for the Proposed Project, specifically efforts to incorporate green building technologies, with the goal of obtaining U.S. Green Building

Responses to Letter 6. San Francisco Planning + Urban Research Association

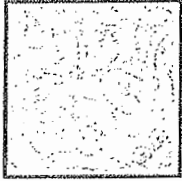
Council's Leadership in Energy and Environmental Design (LEED) gold certification for neighborhood development (ND) or an equivalent standard. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 6.9

This comment expresses general support for the Proposed Project, specifically plans for water conservation and filtration, including replenishing water levels of Lake Merced. Section V.O, Hydrology and Water Quality, pp. V.O.9-V.O.15, describes the Proposed Project's proposed stormwater and hydrology network and the impacts of the proposal on hydrology and water quality. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 6.10

This comment expresses general support for the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.



THE SAN FRANCISCO PRESERVATION CONSORTIUM

845 Sutter Street, No. 512
San Francisco, CA 94109

May 31, 2010

Bill Wycko, Environmental Review Officer
Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400
San Francisco, CA 94103

**Subject: Parcmerced Project Draft EIR, Planning Department Case No. 2008.0021E
Request for Time Extension on Public Comment Period and Additional Documentation**

Dear Mr. Wycko:

The San Francisco Preservation Consortium requests a 30-day extension of the public comment period on the Parcmerced Project Draft EIR. We also request an electronic copy/DVD of the Page and Turnbull Historic Resources Evaluation and the most recent Developer Agreement be sent to the above address. Neither document is available online, nor are the extensive transportation analyses and water supply/growth inducement studies. This is a highly complex project with long-range impacts that the community needs more time to fully evaluate.

As you know, the 191-acre planned neighborhood of Parkmerced was developed from 1940 to 1951 and included nearly 3,500 residential units, a commercial zone, school, recreational areas, and a meadow, with high-rise apartment towers and low-rise garden apartments, built for middle income tenants. Parkmerced was designed as "a city within a city" by its architecture and landscape architecture collaborators, Leonard Schultze and Thomas Church, aided by Robert Royston. Together they developed the site plan, using both radial geometry and a Beaux Arts approach, breaking with the traditional San Francisco street grid. Parkmerced's landscape plan is integral to its function.

The Draft EIR proposes significant unavoidable adverse impacts to Parkmerced which cannot be mitigated. We assert there are feasible preservation alternatives to the proposed Project that would significantly lessen the adverse impacts to this National Register-eligible cultural landscape.

7.1

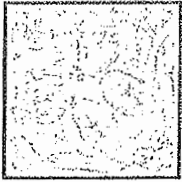
Thank you in advance for your assistance.

Sincerely,

VINCENT MARSH

Vincent Marsh, Acting Chair
San Francisco Preservation Consortium

cc: Planning Commission
Historic Preservation Commission
John Rahaim, Planning Director
Rick Cooper, Environmental Planner
Tina Tam, Historic Preservation Officer
Sophie Hayward, Acting Preservation Coordinator
Linda Avery, Commissions Secretary
Coalition of San Francisco Neighborhoods
Friends of Parkmerced
San Francisco Preservation Consortium
Mary A. Miles, Attorney at Law
Stephen M. Williams, Attorney at Law



THE SAN FRANCISCO PRESERVATION CONSORTIUM

845 Sutter Street, No. 512
San Francisco, CA 94109

The San Francisco Preservation Consortium is a grassroots education and advocacy group comprised of individuals and member organizations. Vincent Marsh is our Acting Chair, Stewart Morton is our Treasurer, Judith Hoyem is our Government Liaison, and Cynthia Servetnick is our eGroup Moderator. Founded in 2001, we currently have 145 listserve members. Our website is:

<http://groups.yahoo.com/group/sfpreservationconsortium>

The Consortium seeks to strengthen the City's Landmarks Ordinance (Article 10 of the Planning Code), including augmenting the powers of the Historic Preservation Commission, and renewing the commitment to uphold the provisions, procedures and protections for historic downtown resources required by Article 11 of the Planning Code.

The Consortium advocates the appointment of appropriately qualified persons to the Planning Commission, the Board of Appeals and the Historic Preservation Commission. The Consortium also advocates increased funding for neighborhood surveys and the incorporation of survey findings into Neighborhood Plans as well as planning and permit application decisions.

In the realm of new legislation, the Consortium would like to see measures that would prevent deliberate "demolition by neglect" of historic resources by private property owners and guarantee basic maintenance of all designated resources owned by the City of San Francisco and the Redevelopment Agency.

To facilitate rehabilitation and adaptive reuse of historic resources, the Consortium urges the removal of administrative barriers to the application of the State Historical Building Code to all eligible structures in the City, as required by California law. Further, the Consortium supports the City's development of additional financial incentives to encourage retention, reuse and maintenance of privately-owned historic sites.

RESPONSES TO LETTER 7

**San Francisco Preservation Consortium, Vincent Marsh, Acting Chair,
May 31, 2010**

Response 7.1

The comment states that the Draft EIR does not provide feasible preservation alternatives to the Proposed Project. Please see Master Response A.4, Alternatives, in Section III.A, Master Responses.

Montessori Children's Center

80 JUAN BAUTISTA CIRCLE - SAN FRANCISCO, CA 94132 - (415) 333 - 4410

June 17th, 2010

San Francisco Planning Department
Environmental Impact Review
Parkmerced Project
Planning Department Case # 2009052073

RECEIVED AT OPG HEARINGS

6-17-10
2008.00210
(R. COOPER)

In the current Parkmerced Project EIR, there is no mention of the existing preschool, Montessori Children's Center, at 80 Juan Bautista Circle. It is therefore unclear what Parkmerced intends to do with that building in this plan. The EIR does mention a new school to be built on Bucarelli Drive, and in many of the maps accompanying the EIR, the school building on Juan Bautista is notably absent. It therefore seems likely that, although it is not stated outright, the planned development will entail demolishing the school on Juan Bautista.

This raises numerous questions.

Timeline

- What is the timeline for the demolition of the school on Juan Bautista, and the construction of the school on Bucarelli?

8.1

Health and Safety

- What are the health risks associated with the demolition of the school? In particular, what effect will demolition have on air quality? Has the impact of this been properly assessed, especially with respect to young children, families, and staff?
- What are the health risks of other nearby buildings being demolished while the school is still in operation? Have these health risks been accurately assessed, given that the children who attend the school are at higher risk for health complications from degraded air quality?

8.2

8.3

Traffic

- Will the new school be built before the old one is demolished, so that a local preschool will be present continuously? If not, what impact will this have on traffic and travel, particularly that of local families?

8.4

- What impact will this have on the families and staff of the existing school? 8.4
con't
- Has the rise in traffic along Bucarelli once the new school is built been accounted for, considering Bucarelli is a narrow street? Have there been considerations and accommodations made for the heavy traffic times of drop-off and pick-up? 8.5
- Will some form of on-site parking for the new school be offered? If not, what will be the impact of an increase in the number of vehicles parking on Bucarelli? 8.6

Green Space

- Also featured in the plan is the transformation of the large green space of Juan Bautista Circle into a commercial area. Not only will this be a loss for all of the residents, it will particularly affect families, who use it for recreation. The loss of this space seems at odds with the project's "sustainability." 8.7

Submitted by Judith Flynn, Director
Montessori Children's Center

RESPONSES TO LETTER 8

Montessori Children's Center, Judith Flynn, Director, June 17, 2010

Response 8.1

The comment asks when the existing Montessori Children's Center is scheduled for demolition. Please see Response TR.30.2, in Section III.B, Public Hearing Comments and Responses.

Response 8.2

The comment inquires about health risks associated with the demolition of the school, especially the effects of demolition on air quality. Please see Response TR.30.3.

Response 8.3

The comment asks about health risks, especially for children, from nearby demolition activities while the school is still in operation. Please see Response TR.30.4.

Response 8.4

The comment asks whether the new school would be built before the old one is demolished so that preschool would be present continuously. Please see Response TR.30.5.

Response 8.5

The comment inquires about traffic demand at drop-off and pick-up times at the proposed new school along Bucareli Drive. Please see Response TR.30.6.

Response 8.6

The comment asks about the availability of on-site parking for the proposed new school. Please see Response TR.30.7.

Response 8.7

The comment states that the development of Juan Bautista Circle as a commercial area would be a significant loss of open space. Juan Bautista Circle is known as the "Commons" open space and will continue to be publicly accessible open space under the proposed development program. Please see Response TR.30.8 for more detail.

LAKESHORE ACRES IMPROVEMENT CLUB
P.O. Box 320222, San Francisco, CA 94132-0222

RECEIVED

Architectural Committee

June 21, 2010

JUN 22 2010

Bill Wycko Environmental Review Officer
San Francisco Planning Department
1650 Mission Street Suite 400
San Francisco, CA 94013

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Re: Parkmerced EIR Case # 2008.0021E

Dear Mr. Wycko,

I am presenting this information representing our architectural committee. You may receive additional information from our full board.

The various amenities presented as well as the installation of renewable energy sources are attractive but obscure the main problem of road access for the increase in population.

The area of Parkmerced as well as much of the surrounding area is accessible for vehicular traffic by mainly four routes, 19th Ave, Brotherhood Way, Lake Merced Boulevard, and John Daly Boulevard and these are overly congested many times during the day. Even Ocean Avenue at Junipero Serra, which is used as an indirect approach is usually congested. Additionally, the planned expansion of SFSU will cause further traffic congestion.

There is no question that any addition beyond a few hundred homes will be more than the present infrastructure can handle.

The argument that we need more housing should not be used to overcome the fact of inadequate road access. The San Francisco, Daly City, Colma, and San Bruno area is in reality a single unit. Many residential units are being built close to major highways and public transportation just outside our City limit that have better vehicular access and equal public transportation to downtown San Francisco.

In short, the road access to this area should be the primary consideration before proceeding.

Respectfully,

Chris S. Manitsas,
member of the Architectural Committee of LAIC

RESPONSES TO LETTER 9

**Lakeshore Acres Improvement Club, Chris S. Manitsas, Member of the
Architectural Committee, June 21, 2010**

Response 9.1

The comment states that traffic impacts as a result of the Proposed Project would be too severe. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for additional discussion of this issue.

SPEAK SUNSET PARKSIDE EDUCATION AND ACTION COMMITTEE
1329 7th Avenue, San Francisco, CA 94122-2507 (415) 976-4816

June 21, 2010

San Francisco Planning Commission
1650 Mission Street #400
San Francisco, CA 94103

RECEIVED

JUN 23 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

RE: Parkmerced Project Case No. 2008.0021E Comments on the Draft EIR

Honorable Mr. President and Commissioners,

Established in 1969, the Sunset Parkside Education and Action Committee (SPEAK) is one of the oldest and largest community organizations in the Sunset – Parkside District of San Francisco. The primary purposes of SPEAK are to educate and inform residents about matters of mutual concern to the community, such as land use, transportation, public safety and public services, and to present concerns of the community to elected officials and public agencies so that we may work together to improve the quality of life in the Sunset – Parkside districts.

SPEAK has reviewed the Draft EIR of the Parkmerced project and would like to offer the following comments.

1. Contiguous communities. The existing Parkmerced development was developed as a city within the City and will probably remain an isolated district of San Francisco. However, it is not an island and is tied to the surrounding neighborhoods by many features, most notable the transportation and utility systems, fire, police and other social services, as well as bio-climatic impacts. While the surrounding San Francisco State University, Stonestown Shopping Center etc., are mentioned in the document as part of the context, it should be made clear from the DEIR what impacts the proposed multi-phased Parkmerced proposal would have on the neighboring districts.

10.1

2. Time frame. Since the proposed project would be implemented over the next thirty years, it is necessary to study these changes as they occur in sequence. The project is described as having a number of distinct phases but the DEIR does not attempt to study the impacts of each phase as it occurs in time. It is extremely important to do this for several reasons: phasing the impacts would permit decision-makers to grasp the scope of the changes and city agencies to prepare for them; it would permit evaluation after the first phase is completed and before the next phase is undertaken; it would suggest the mitigation measures that need to be implemented after each phase before any further development is begun.

10.2

3. Affordable units. While the proposed redevelopment of Parkmerced offers many welcome sustainable features, the demolition of more than 1,500 affordable rental units is not "green" or fiscally justifiable. The DEIR lacks an assessment of the socio-economic impacts of the demolition of affordable and family oriented housing units and their phased replacement with market-rate housing in mid and high-rise buildings. SPEAK requests the preparation of a socio-economic analysis as an addendum to the DEIR.

10.3

10.4

4. Transportation. Residents of the Sunset and Parkside districts are naturally very concerned about the transportation impacts generated by an additional 5,000 dwelling units or 10,000 to 20,000 additional residents. Although it is temporary and may be lifted this summer, the closure of the southern part of the Great Highway, west of the San Francisco Zoo, residents are already experiencing a significant increase of trips on Sloat and Sunset Boulevards, the Great Highway, and 19th Avenue as traffic seeks a detour. The transportation study indicates that main arteries (19th Avenue/Junipero Serra leading to HW 280 and Parkmerced Boulevard) will be impacted at Level E

10.5

and Level F due to the population increase of the Parkmerced project and the cumulative impacts of additional projects on the parcels sold off from the original Parkmerced property. There are other projects in the pipeline, as well, which will further impact the circulation of San Franciscans trying to reach the Peninsula and SFO and automobiles commuting from Marin County to the Peninsula.

10.5
con't

In particular, SPEAK does not support the rerouting of the M-line through Parkmerced as it will require an additional crossing of MUNI tracks of 19th Avenue and cause additional slowdown of vehicular traffic. Of course an alternative would be a crossing at below grade. It may be more flexible and efficient to establish shuttles into Parkmerced to serve the residents on an as-needed basis.

10.6

As to the internal circulation in the proposed Parkmerced project, the parking requirement of 1 to 1 and the increase in the amount of streets throughout the project are contradictory to the goal of creating a not-auto-centric development. But let's be realistic. If you live in the "Outer Lands" and have a job on the Peninsula it will be extremely hard to convince people that public transportation with a transfer from the Parkmerced shuttle to Muni (streetcar) to BART will be a preferable alternative to the use of an auto from a location with direct access to HW 280.

10.7

5, Historic Site Plan and Landscape Plan. SPEAK appreciates the potential Historic Landscape of Parkmerced and especially the semi-private courtyards of the two-story high residential development designed by renowned landscape architect Thomas Church. The destruction of the historic landscape would mean a significant loss of cultural resources which cannot ever be replaced.

10.8

Alternative C (Retention of the Historic District Central Core) would retain a sizable part of the existing development and also result in a decrease of its impacts since 3,000, instead of more than 5,000, new units would be added. This alternative would also retain more of the mature trees. Although the DEIR acknowledges that the site contains many mature trees, it summarily states that they are not landmarked; this does not mean that they are not worth a study which would indicate the trees that might be retained. In the harsh climate near the ocean, it would take decades to replace these trees with similar mature trees. The impacts of habitat modification for birds and other wildlife which the removal of the trees would cause have not been addressed in the DEIR.

10.9

6. Alternatives. The section would be more representative of the real-world alternatives if the suggestion in #2 (above) were taken. That is, if the project were divided into four or more discrete phases, each of the phases' impacts could be attributed more evenly as they occur. Each phase would form an Alternative, and studied with its additive impacts. "Who does what and when" could be understood more directly and responsibilities followed up.

10.10

7. Appendix. The Appendix is part of the EIR. This appendix is full of self-serving promotional material, much of it presented in super-saturated colored photographs and renderings that are a hard-selling advertisement of the project. Graphics and color are a language, too, and that language should not sidestep the level of objectivity that is mandated for the entire document, not just the textual presentation. The color should be objectively rendered, as in pp. 40-50 and are entirely inappropriate in pp. 86, 101-114 etc.

10.11

SPEAK appreciates your attention to our concerns and comments on the DEIR.

Sincerely,



Marc Duffett, President SPEAK

RESPONSES TO LETTER 10

**Sunset Parkside Education and Action Committee, Marc Duffett, President,
June 21, 2010**

Response 10.1

The comment asks that the EIR clarify impacts the Proposed Project would have on neighboring districts, including SFSU, and Stonestown Galleria. The EIR analyzes impacts in areas surrounding the Project Site in all relevant topic areas. For example, the transportation analysis addresses traffic impacts at intersections adjacent to both the university and the shopping center, at 19th Avenue and Holloway Avenue, 19th Avenue and Winston Drive, Lake Merced Boulevard and Winston Drive, and Lake Merced Boulevard and Font Boulevard. The discussion of shadows in Section V.I, Wind and Shadow, discusses the potential impacts on Lake Merced Park from a combination of shadows from the Proposed Project with potential shadows from new buildings on the university campus on p. V.I.61. Figures V.I.27 through V.I.46, on pp. V.I.62 – V.I.81, show the limited shadow that would be cast by the proposed project on university property. In other topic areas, the Proposed Project would not result in substantial changes that would adversely affect neighboring uses such as the university or the shopping center. For example, the land use immediately adjacent to the SFSU housing on the southern boundary of the SFSU campus would continue to be residential. Section V.A, Land Use, explains on p. V.A.12 that there are commercial, institutional, recreational and residential uses to the north of the Project Site, and the proposed commercial, residential and recreational land uses would not conflict with these existing uses. See also Response TR.11.3, in Section III.B, Public Hearing Comments and Responses, for a discussion of effects of the Proposed Project's retail space on other retail uses in the vicinity.

Cumulative effects of potential development projects in the vicinity of the Project Site include the San Francisco State University (SFSU) 2007-2020 expansion (Campus Master Plan), possible expansion at the Stonestown Galleria Shopping Center site, possible mixed-use development at 77-111 Cambon Drive, approved residential development at 800 Brotherhood Way, potential redevelopment of the San Francisco Unified School District (SFUSD) "School of the Arts" site (700 Font Boulevard), possible residential development on a portion of the Arden Wood site (445 Wawona Street); and anticipated mixed-use development at the Kragen Auto Center in the Balboa Park Better Neighborhoods Plan (1150 Ocean Avenue Project). These cumulative development projects are included in the EIR under cumulative impacts in the following sections: V.A, Land Use; V.B, Aesthetics; V.C, Population and Housing; V.D.a, Historic Architectural Resources; V.D.b, Archaeological Resources; V.E, Transportation and Circulation; V.F, Noise; V.G, Air Quality; V.I, Wind and Shadow; V.J, Recreation; V.K, Utilities and Services Systems; V.L, Public Services; V.M, Biological Resources; V.N, Geology and Soils; V.O, Hydrology and Water Quality; and V.P, Hazards and Hazardous Materials.

Response 10.2

The comment states that the Draft EIR does not attempt to study the individual impacts of each phase of development as it would occur over time. Please see Response TR.26.1 for a discussion of the project phases.

Response 10.3

The comment states that demolition of more than 1,500 rental units is not sustainable or fiscally justifiable. Please Response TR.2.2 for a discussion of the displacement of existing residents, and Response TR.25.6 for a discussion on sustainability of demolition.

Response 10.4

The comment raises concerns about the displacement of residents and socio-economic impacts to residents as a result of implementation of the Proposed Project. Please refer to Responses TR.2.2 and TR.25.7.

Response 10.5

The comment states that the transportation impact analysis in the Draft EIR indicates that some intersections will operate at LOS E and F due to the population increase from the Parkmerced Project and other projects, and that these projects will have cumulative impacts on traffic and circulation. The comment also notes that the temporary closures of the Great Highway may exacerbate the impacts. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 2.4, in Section III.A, Master Responses, for discussion of the cumulative impact analysis, which incorporates regional growth as well as specific projects proposed in the study area. See also Response TR.24.2 for discussion of the effects of temporary closures of the Great Highway.

Response 10.6

The comment expresses opposition to the relocation of the M Ocean View line into the Project Site due to traffic congestion associated with the additional rail crossing of 19th Avenue. The comment also suggests grade separation of this crossing. Refer to Response TR.31.2 for additional discussion of grade-separated light rail crossings of 19th Avenue.

Response 10.7

The comment states that the planned parking ratio of 1:1 and the increase in the number of streets on the Project Site are contrary to promoting use of transit, walking, and cycling. Please see Response TR.5.4 for a discussion of the project's parking supply.

The comment also notes that the proposed transit connections, particularly for residents commuting to the Peninsula or South Bay, would not be convenient, requiring a transfer from shuttle to Muni streetcar to BART, and would discourage transit use. Although this is a comment on the Proposed Project, and not specifically about the adequacy and accuracy of the analysis presented in the Draft EIR, it should be noted that the analysis conducted for the Draft EIR projects that only 2 percent of external person-trips to the Peninsula or South Bay generated by the Proposed Project were forecasted to occur by transit.

Response 10.8

The comment states that demolition of the historic landscape would result in a significant, irreplaceable loss of a cultural resource. As stated in Section V.D.a, Cultural Resources (Historic Architectural Resources), p. V.D.27, the Draft EIR concludes that the Proposed Project would have a significant and unavoidable adverse impact on a qualified historic resource on the Project Site. Specifically, the proposed demolition of the existing garden apartment buildings and removal of existing landscape features on the Project Site would impair the historical significance of the Parkmerced historic district historical resource. Please see Master Response A.1 Historic Resources.

Response 10.9

The comment expresses concern about the Proposed Project's impacts to the bird population once trees are removed. Please see Response TR.17.2.

Response 10.10

The comment suggests that each phase of the Proposed Project constitute an alternative. Please refer to Response TR.26.1 for a discussion of the analysis of project phasing in the EIR, and to Master Response A.4, Alternatives, for a discussion of alternatives.

Response 10.11

The comment states that the Draft EIR Appendix contains promotional material. Please refer to Response TR.26.3.

Lakeshore Acres Improvement Club

**P.O. Box 320222
San Francisco, California 94132-0222**

RECEIVED

JUN 24 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

June 23, 2010

To: Bill Wycko, Environmental Review Office

From: Bruce Selby, Co-President

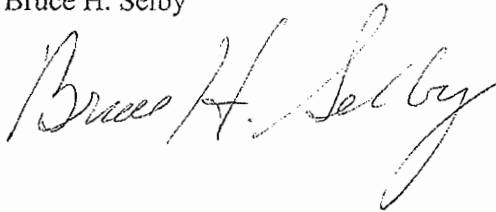
Subject: Parkmerced Project Draft EIR

I have reviewed both of the subject documents. I have also taken into consideration all the other proposed developments along the 19th Avenue corridor. The conclusion reached is that the increase of density of residences within Parkmerced would create an intolerable increase in traffic along 19th Avenue and other streets, in adjacent residential areas. The end result would be a major negative impact on the quality of life of residents in our Southwest area of San Francisco. The only way this could be mitigated would be to substantially scale back the number of additional number units proposed in Parkmerced.

11.1

Until this is done I am opposed to the project.

Bruce H. Selby



RESPONSES TO LETTER 11

Lakeshore Acres Improvement Club, Bruce H. Selby, June 23, 2010

Response 11.1

The comment states that Proposed Project would generate too much development, resulting in too many traffic impacts. This is not a comment on the adequacy of the Draft EIR, but on the merits of the Proposed Project in light of information presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for additional discussion of this issue.

SIERRA CLUB
SAN FRANCISCO GROUP
85 Second Street, Box SFG, San Francisco, CA

July 6, 2010

Bill Wyko, Environmental Review Officer
Planning Department, FAX 558-6409
1660 Mission Street
San Francisco CA 94103-2414

Re: Park Merced DEIR File No. 2008.0021E

Dear Mr. Wycko,

Thank you for the opportunity to comment on the subject DEIR.

The Sierra Club's major comment is that a project of this magnitude should have included an alternative with minimum transportation impacts. We are concerned that the project will be allowed to proceed and create profits on the land while causing delays to Muni transit service, which is already suffering from operating costs exceeding their available funding. The problem is that DEIRs use a traditional method of determining transportation mode based on residential origin and attractions to a destination. This method doesn't work for automobile trips which require a parking place near the residential origin and another parking place near the destination. If either end of the trip does not have parking the auto trip cannot take place. Congestion happens on roadways between areas of more than ample parking. City policy in San Francisco recognized this statement as true, when over forty years ago, we limited the supply of parking in the central business district along with improving transit as the way to reduce increases in congestion.

12.1

The problem of this EIR, and this project, is that the traditional method of analysis provides no incentive for the developer to consider an alternative with less parking and therefore fewer transportation impacts. We suggest that an Alternative Project G. should have been analyzed with: Full Buildout and Transit Options (similar to E,) and Minimum Transportation Impacts, including the following:

- 1) Full buildout because it includes almost as many housing units as Alt. B. without having to demolish thousands of viable units.
- 2) Some additional housing should be provided above the commercial district.
- 3) Curbside parking on the site should be reduced by 50% because this will create many useful micro parks (located with consideration of prevailing winds and sun) while leaving about 0.1:1.0 curbside spaces per unit. These parking spots should be metered 24/7 so that they are available for visitors and not just preserved for residents. The remaining curbside parking will be greater than SOMA, per unit.
- 4) Off street parking ratio should be 0.5:1:0 unit because the Planning Department produced a paper showing that this ratio was adequate for areas with good transit (SOMA). The changes to the 'M' line and the developer provided shuttle constitute good transit.
- 5) The retail should be sized to provide only for local needs because there is destination retail with ample parking and transit available at nearby Stonestown. This will greatly reduce the commercial off-street parking provided along with the traffic generated.

12.2

The Sierra Club suggests that the above alternative would provide San Francisco with a more sustainable project in return for the sponsor requested, IV.4 amendments to the height and bulk limits of the Planning Code. The above project would be a walkable, livable community with less driving and the vehicle of choice for many residents will be a shopping cart or the shuttle. The alternative project should be analyzed because less parking and less driving will result in fewer delays to Muni.

The proposed project includes a large number of off-site traffic improvements, for which the funding source is not clear. Some mitigations involve additional turning or traffic lanes which severely decrease pedestrian safety. The Sierra Club invites the project sponsor and other possible funding sources to consider how many of the improvements can be eliminated or reduced in cost if a more sustainable project is constructed.

12.3

Sierra Club traditional comments are as follows:

- 6) On page V.A.5 it should be noted that pedestrian access to the Harding Park Golf Course has been limited since the course management was privatized.
- 7) Pages V.E.41-43 are a good discussion of trip generation modal splits. This supports our major comment by never mentioning the availability of parking as an “influence on travel behavior.”
- 8) The developer provided shuttle will be useful for Park Merced residents who cannot or desire not to walk long distances. However the history of developer provided transit is that it doesn’t last very long. The EIR should show future new guaranteed funding sources from the project and a method to determine funding needs for Muni when the shuttle service is discontinued; or show how the shuttle will go on in perpetuity.
- 9) The EIR should state that the shuttle will provide a time table at all stops and will serve residents and non-residents (both with Fast Passes) at on and off site stops. This will serve visitors to residents and project retail and improve service to BART for non-residents. Requiring a Fast Pass for shuttle service will prevent residents (see below) from selling their pass while improving Muni financial viability (see above). Allowing greater use of the shuttle will reduce off-site transportation impacts.
- 10) The III.37, transportation demand management program, discussion should include a discussion of the transportation impacts of a project which provides at least one Muni adult Fast Pass (or greater numbers of reduced price passes) for each apartment or condo as part of fees or rents
- 11) The EIR should discuss how the Metro dedicated right-of-way will be maintained as Muni crosses the many streets that cross the tracks. Too often these transit crossings are impeded by stop signs. Signal lights with transit priority or railway gates would help reduce delays to transit.
- 12) During the pre-eir discussion phase of this project Crespi Drive was discussed as a possible Woonerf, pedestrian way with limited auto traffic moving at a pedestrian pace. The EIR should discuss how Crespi was required to become a conventional commercial street instead of one of the first Woonerfs in San Francisco.
- 13) The EIR should show the provisions for safe pedestrian crossings of Nineteenth Avenue and Junipero Serra Boulevard. This will also be necessary for those walking to the more distant ‘M’ line because they won’t want wait for a ‘J’ and then transfer to the ‘M’.

12.4

12.5

12.6

12.7

12.8

12.9

12.10

12.11

- 14) The EIR should discuss the uses of the median and abandoned trackway on Nineteenth Avenue rather than slice away the space for additional traffic lines. 12.12
- 15) Rather than accept future auto traffic caused delays to the 'M' the EIR should discuss a method of early reduction of delays where the 'M' crosses northbound Nineteenth and also northbound Junipero Serra. This would serve as a test of future delay reduction methods, where the 'M' or 'J' crosses southbound Nineteenth. Caltrans will be more likely to consider tests during the current traffic levels and Muni and their riders will appreciate any near term improvements. 12.13

Comments to Sustainability:

- 16) The EIR includes partial discussions of water and energy sustainability, areas where the City has concerns. This project is large enough to easily afford a study of the most sustainable alternatives, many of which have been already considered. The large size also distributes the costs of sustainability across more units making alternatives financially feasible. The EIR should include a short discussion of the results of these studies, whether proposed for inclusion in the project or not. This is a social equity requirement of a large project which can be completely fulfilled by putting the complete studies on an appropriate City website.. 12.14
- 17) Page III.51 Waste Water, should have included discussions: of "gray water" systems for toilet flushing; use of City recycled water and storage of rainwater for summer irrigation as well filling Lake Merced. 12.15
- 18) Page III.51, Electricity and Natural Gas, should have included discussions of solar hot water, and photo voltaic power generation. 12.16

Comments to Hot Lanes:

- 19) The EIR has only a minimal discussion of hot lanes for this project. This discussion should be expanded to cover the basics of hot lanes as well as the site specifics listed below: 12.17
- 20) Diamond lanes for buses and carpools should be discussed because they will: help transit as well as hot lanes, have the same limits but may engender less opposition 12.18
- 21) Since the hot lanes are supposed to reduce auto traffic caused delays to the 28 bus the EIR should include a description of bus stops and how buses will hopefully not have to wait to re-enter traffic. The EIR should also include a discussion of how traffic will be allowed to make right turns across a hot lane, without paying a fee. 12.19
- 22) The EIR should include a discussion of why Hot Lanes were not considered for northbound traffic along with the concept that hot or diamond lanes need not be continuous. 12.20
- 23) The EIR should include an estimate of the additional revenue, generated by hot lanes and how the money might be used. 12.21

Very truly yours,

Howard Strassner, Emeritus Chair Transportation Committee
419 Vicente, San Francisco CA 94116, 661-8786, (h,w)
email: ruthow@dslxextreme.com

RESPONSES TO LETTER 12

Sierra Club, San Francisco Group, Howard Strassner, Emeritus Chair Transportation Committee, July 6, 2010

Response 12.1

The comment states that the Draft EIR uses a traditional method for forecasting transportation mode choice based on residential origins and attractions to a destination, and that this method is inadequate for predicting auto trips which require a parking space near the residential origin and another space near the destination, because if there is no parking, a trip cannot take place. The effects of parking availability were accounted for in the EIR indirectly in the transit mode choice forecasts. As described in the *Transportation Impact Analysis Report* Technical Appendix – Appendix J, the cost of parking, which is generally correlated to the availability of parking, was included as a variable in the forecasts. Please refer to Master Response A.2, Transportation and Circulation, Section 2.2, in Section III.A, Master Responses, for discussion of the mode choice forecasts.

Response 12.2

The comment states that an additional alternative should have been analyzed in the Draft EIR to consider a full Buildout with Transit Options (similar to Alternative E) and a Minimum Transportation Impacts. Please refer to Master Response A.4, Alternatives.

Response 12.3

The comment states that the source of funding for a large number of the Proposed Project's off-site improvements remains uncertain, including mitigation measures for significant project impacts and a fair share contribution to significant cumulative impacts. Please refer to Master Response A.2, Transportation and Circulation, Section 4, for additional discussion of funding.

The comment also notes that some mitigation measures involve new turning lanes, which the comment suggests decrease pedestrian safety. Generally, the EIR's discussion of mitigation measures where roadway widening was identified indicates that pedestrian crossing times would increase, which is an undesirable consequence. Mitigation measures, such as Mitigation Measure M-TR-2D, where additional lanes could be constructed within the existing right of way (e.g., through the removal of on-street parking), were considered more desirable because pedestrian crossing distances would remain the same. Finally, other more large-scale mitigation measures were eliminated from consideration altogether and not presented in the EIR because they would substantially increase pedestrian crossing times, which would be considered contrary to the City's Transit First Policy. See the discussion of the Proposed Project's significant impact to the intersection of 19th Avenue/Sloat Boulevard on pp. V.E.54 as an example of a situation where

large-scale roadway widening would be required to mitigate a significant impact, but because this would be inconsistent with City policies, such mitigation was deemed infeasible.

Response 12.4

The comment indicates that pedestrian access to Harding Park Golf Course has decreased as a result of course management privatization. As stated in Section V.A, Land Use, on p. V.A.5, and in Section V.J, Recreation, on pp. V.J.1 and V.J.4, the Harding Park Golf Course is a San Francisco Recreation and Park property. Similar to private golf courses, pedestrian access to municipal golf courses is typically limited, in part for safety. Harding Park Golf Course is fenced along Lake Merced Boulevard and there are no trails through the golf course. Pedestrians from the Parkmerced neighborhood can cross Lake Merced Boulevard at Brotherhood Way, Higuera Avenue, Font Boulevard, and State Street to access the north-south perimeter pathway that parallels the Harding Park Golf Course. Pedestrian access to Lake Merced Park from Lake Merced Boulevard is limited, with one location south of the golf course at Brotherhood Way and one north of the golf course at South State Drive. However, the majority of trails into Lake Merced Park, as opposed to the perimeter pathway, are located in the north and south areas of Lake Merced near East Lake and Impound Lake, respectively. Figure III.15: Proposed Pedestrian Plan, in Chapter III, Project Description, p. III.41, identifies the Proposed Project's internal pedestrian network. Planned off-site pedestrian improvements are discussed in Section V.E, Transportation and Circulation, pp. V.E.98-99.

Response 12.5

The comment cites the Draft EIR's discussion of modal split, and states that parking is an influence on travel behavior. See Response 12.1 and Master Response A.2, Transportation and Circulation, Section 2.2.

Response 12.6

The comment states that the history of developer-provided transit shows that service does not last, and the EIR should show future guaranteed funding for shuttle operation. Please refer to Master Response A.2, Transportation and Circulation, Section 4, for discussion of funding of transportation features of the Proposed Project, including the operation of the proposed shuttle.

Response 12.7

The comment asks that the Draft EIR state that timetables will be posted on each shuttle stop and that shuttles should accommodate both residents and non-residents with a Muni Fast Pass. The specific design and amenity program for shuttle stops constructed within the Project Site has not been determined at this time, and it is thus uncertain whether timetables will be posted. However,

this level of detail does not affect the analysis or conclusions presented in the Draft EIR, and the shuttles are not required to mitigate any significant environmental impacts of the Proposed Project. The shuttles would be operated as a free service for Parkmerced residents only, funded through the collection of homeowners association dues. As a result, shuttle riders would be frequent users, such that even if timetables are not posted, riders would be familiar with the frequencies and arrival patterns of shuttles. The shuttles are not intended for use by non-residents.

Response 12.8

The comment states that the Draft EIR should discuss the impacts of providing at least one Fast Pass, and reducing the price of additional passes, for each apartment or condominium as part of fees or rents. As with the residential Eco-Pass suggested in Comment 4.5, provision of Muni Fast Passes as part of rents or homeowners association dues has not been proposed as part of this Project, nor is it required as part of mitigation for significant project-related impacts, and therefore, is not discussed in the EIR.

Response 12.9

The comment suggests the use of signal lights with transit priority or railway gates in order to reduce delays to transit. As part of the Proposed Project, new signals, equipped with transit signal priority, would be installed at Crespi Drive/Gonzalez Drive and Font Boulevard/Gonzalez Drive. No signals would be installed at the other crossings internal to the site where the M Ocean View crosses; however, at those locations, cross-traffic would be required to stop and the light rail vehicles would have the right of way. In this respect, Muni would have priority at each intersection internal to the site.

Response 12.10

The comment states that the Draft EIR should discuss why Crespi Drive is not a pedestrian way with limited auto traffic. The purpose of the EIR is to evaluate the environmental impacts of the Proposed Project, which does not include conversion of Crespi Drive into a pedestrian way. Additionally, the EIR did not identify pedestrian-related impacts associated with the currently proposed design of Crespi Drive, and therefore conversion of Crespi Drive to a pedestrian way, as suggested by the comment, is not necessary as a mitigation measure.

Response 12.11

The comment states that the Draft EIR should discuss provisions for safe pedestrian crossings of 19th Avenue at Junipero Serra Boulevard. Pedestrian treatments, such as medians, crosswalks, and sidewalks proposed for various intersections in the study area, including the 19th

Avenue/Junipero Serra Boulevard intersection are illustrated in the *Transportation Impact Analysis Report* Technical Appendix. The comment specifically references a scenario where transit riders would walk longer distances to reach the M Ocean View light rail stop rather than wait for a J Church train. Under the Proposed Project, the J Church train would terminate at Balboa Park Station and would not continue to the study area. However, under some alternatives to the Proposed Project, the J Church would continue into the study area, and either enter the Project Site along the proposed M Ocean View revised route, or continue along the 19th Avenue median, terminating at Holloway Avenue. Under this scenario, the M Ocean View would terminate in the Project Site and would not extend across 19th Avenue. Under these conditions, as noted by the comment, transit patrons east of 19th Avenue wishing to travel northbound may opt to cross 19th Avenue into the Project Site to access the M Ocean View.

Pedestrian crossings across 19th Avenue would be somewhat improved by the Proposed Project under this scenario. The Proposed Project would re-align the crosswalk across 19th Avenue north of Junipero Serra Boulevard to be perpendicular to 19th Avenue, substantially reducing the crossing distance for pedestrians attempting to access the M Ocean View from areas east of 19th Avenue. No other changes are proposed.

Response 12.12

The comment states that the Draft EIR should discuss alternate uses for the abandoned median on 19th Avenue. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for discussion of the pedestrian-related benefits of relocating the M Ocean View, in terms of reductions in the number of pedestrians required to cross 19th Avenue and increased safety for those using the new platform. This discussion also notes that the mid-crossing pedestrian refuge on 19th Avenue at Holloway Avenue would remain in place with the relocated light rail tracks, and would not be removed for an additional traffic lane at this location. Overall, as shown in the EIR on Figure III.12: Proposed Off-Site Traffic Improvements Plan, in Chapter III, Project Description, p. III.33, with relocation of the M Ocean View, the median would be landscaped to provide a more attractive gateway to the southern end of San Francisco.

Response 12.13

The comment states that the Draft EIR should discuss methods to reduce delays to the M Ocean View line caused by traffic where it crosses 19th Avenue. The EIR did not identify increased delays to either the M Ocean View or the J Church light rail vehicles due to increased auto traffic because the light rail vehicles generally travel in an exclusive right of way and are only minimally affected by traffic congestion. However, the EIR did identify an increase in travel time to the M Ocean View due to the increased distance it would travel if re-aligned to extend into the Project Site. Impact TR-21, on p. V.E.88, describes the impact, and Mitigation Measure M-TR-

21, also on that page, describes two mitigation measures that would reduce the impact, if feasible. However, since feasibility of these measures is uncertain, the impact was determined to be potentially significant and unavoidable.

Mitigation Measure M-TR-21B, if determined to be feasible, would provide signal priority treatments along the light rail corridor to reduce delays and improve travel times for the M Ocean View, as suggested by the comment.

Response 12.14

The comment states that the Draft EIR should include a sustainability alternative. Please refer to Master Response A.4, Alternatives.

Response 12.15

The comment states that the Draft EIR should include discussions of “gray water” systems for toilet flushing and the use of recycled water and storage of rainwater for summer irrigation as well as filling Lake Merced. As stated in Chapter III, Project Description, pp. III.47-III.48, a formal request to the San Francisco Public Utilities Commission (SFPUC) has been made by the Project Sponsor, asking that non-potable water be made available for irrigation of green spaces and for toilet flushing in all new residences. Specific sources of non-potable water have not been identified in the EIR, but may include gray water for flushing. If a municipal supply of recycled water is not available, or if the request of the SFPUC is not approved, facilities to meet the Proposed Project’s demand for recycled water may be constructed on site. As described in Section V.K, Utilities and Services Systems, pp. V.K.13-V.K.15, these facilities could range from an on-site wastewater treatment system to tanks that hold captured rainwater, and a system to recycle graywater.

As stated on pp. III.48-III.51, the Proposed Project would also provide an on-site stormwater system to capture and filter stormwater runoff from buildings, streets, and other non-permeable surfaces rather than diverting it to the municipal wastewater system. This system would capture and filter runoff through a series of on-site bioswales, streams, ponds, and other natural filtration systems intended to retain, detain, and infiltrate conveyed runoff. The collection pond would hold water year-round and native aquatic vegetation would be encouraged. Most of this stormwater runoff would infiltrate directly into the Upper Westside groundwater basin that feeds Lake Merced.

Section V.K, Utilities and Services Systems, pp. V.E.12-V.E.20, analyzes the Proposed Project’s impacts on water supply and wastewater.

Response 12.16

The comment states that the Draft EIR should include discussions of solar hot water and photovoltaic power generation. The EIR is an environmental analysis of the Parkmerced Project as proposed by the Project Sponsor. Solar hot water features are not included as a component of the Project. As stated in Chapter III, Project Description, p. III.52, the Proposed Project includes the installation of photovoltaic cells as a part of the Sustainability Plan in order to meet a portion of the Proposed Project's electricity demand. The photovoltaic cells would be installed on up to 50 percent of the roof areas of new buildings. As described in Section V.Q, Mineral and Energy Resources, p. V.Q.4, with implementation of strategies identified in the Sustainability Plan, including the photovoltaic cells on roof tops, the Proposed Project would not result in the use of large amounts of fuel or energy, and energy mitigation measures are not required. At a minimum, the Proposed Project's energy demand would be typical of or less than that of a project of this scope and nature that did not include energy-saving features. With implementation of energy-saving strategies as outlined in the Sustainability Plan, conservation of energy would likely exceed current state and local energy conservation standards, including Title 24 of the California Code of Regulations (as adopted by the City in the San Francisco Building Code) enforced by the Department of Building Inspection.

Response 12.17

The comment requests additional discussion of HOT lanes in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for additional discussion of HOT lanes.

Response 12.18

The comment states that "diamond lanes" (i.e., lanes designated for use by only transit vehicles and carpools) should be considered in the Draft EIR instead of HOT lanes. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for discussion of "diamond/HOV lanes," as compared to HOT lanes. Generally, both provide similar benefits to transit, while the HOT lanes would provide an additional option to drivers and would generate revenue that could be used for other transportation projects in the area.

Response 12.19

The comment states that the Draft EIR should include discussion of how buses would not have to re-enter traffic under conditions with a HOT lane and how traffic will be allowed to make right turns across a HOT lane, without paying a fee. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for discussion of the reduced delay associated with

pulling back into traffic from bus stops that would be provided by a HOT lane. Right-turn access from southbound 19th Avenue into the Project Site would be from the HOT lane. The operational details of allowing this access without imparting a fee on vehicles that are using the lane only for access would depend on the toll collection technology. For example, one possible means of collection would be to assess the toll at intersections using electronic collection, such as Fastrak. The toll could be applied only to vehicles traveling through the intersection using the HOT lane. Under this configuration, vehicles wishing to turn right into the Project Site, would travel in mixed flow lanes until they have passed through the last intersection before reaching their access point, at which point they could enter the HOT lane and turn right into the Project Site without traveling through an intersection in the HOT lane. As noted above, the means by which this movement would be allowed without incurring a toll remains uncertain; the example above is meant to illustrate that it is operationally feasible. Ultimately, the selection of specific technology and enforcement mechanisms are not expected to affect the analysis and/or conclusions presented in the Draft EIR

Response 12.20

The comment questions why HOT lanes were not considered for northbound traffic in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for discussion of why HOT lanes were not considered for the northbound direction. However, if feasible, Mitigation Measure M-TR-23, p. V.E.92, would implement transit-only lanes along both directions of 19th Avenue between Holloway Avenue and Winston Drive.

Response 12.21

The comment states that the EIR should include an estimate of revenue generation by HOT lanes and how this money might be used. The revenue generation of a HOT lane would depend on a variety of factors, including price, duration (both physically and temporally), and technology. Ultimately, to be considered viable, the HOT lane would have to generate enough revenue to at least pay for its own operating and maintenance costs. If additional revenue were to be generated, agreements would likely be required with various City agencies and Caltrans with respect to its use. However, it should be noted that no component of the Proposed Project relies on revenue generated by the HOT lanes, with the exception of operating and maintaining the HOT lanes themselves.

RECEIVED

JUL 12 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

Mr. Bill Wycko, Environmental Review Officer
1650 Mission Street Suite 400
San Francisco, CA 94103

Dear Mr. Wycko:

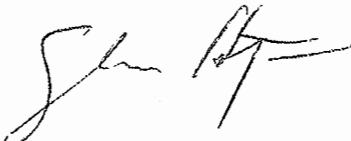
Because the Merced Extension Triangle is located immediately south east of the Park Merced complex, the Merced Extension Triangle Neighborhood Association (METNA) Executive Board would like to emphatically reiterate our position regarding the extensive redevelopment of the Park Merced complex. As we have stated before "We support the proposed improvements for housing and retail, however we have major concerns regarding the size and scope of the Project as it relates to the overall infrastructure, parking, traffic, sewers, water, electricity, views, as well as other related issues. We want mitigation measures in place to address any significant environmental effects. We oppose, at this time, and amendments to the Planning Code height and Bulk Maps."

13.1
13.2

As an organization we will continue to follow the progress of this development and will address the issues of the most concern to our community as needed.

Sincerely,

The METNA Executive Board



Glen Hatakeyama

Grenville Berliner
Terry Watson
Jane Bailey
Richard Zerga
Steve Heide
Dwayne Price

RESPONSES TO LETTER 13

**Merced Extension Triangle Neighborhood Association Executive Board,
Glen Hatakeyama, July 7, 2010**

Response 13.1

The comment requests that the Draft EIR identify mitigation measures for significant environmental effects. The various topic sections in Chapter V, Environmental Setting and Impacts, discuss significant or potentially significant impacts of the Proposed Project and identify mitigation measures, where appropriate. Table II-1: Summary of Significant Impacts and Mitigation Measures, in Chapter II, Summary, pp. II.3-II.45, is a summary of these impacts and their corresponding mitigation measures.

Response 13.2

The comment expresses opposition to the proposed amendments to the Planning Code height and bulk maps that would be required to implement the Project. Amendments to the Planning Code are summarized in Chapter III, Project Description, pp. III.25-III.29, and analyzed in Section V.A, Land Use, pp. V.A.12-V.A.13, and Section V.B, Aesthetics, pp. V.B.21-V.B.24. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.



West of Twin Peaks Central Council

A Resource for Neighborhood Organizations West of Twin Peaks in San Francisco since 1936

PO Box 27112
San Francisco, CA 94127

<http://www.westoftwinpeaks.org/>

July 11, 2010

Mr. Bill Wyco
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA. 94103

Subject: Re Parkmerced Project Draft EIR

Dear Mr. Wyco,

This forwards the West of Twin Peaks Central Council's (WTPCC) Comments on: 1) the Parkmerced DEIR and 2) how this DEIR relates to the San Francisco Planning Departments recently published 19th Avenue Corridor Study.

The WTPCC helped to initiate the 19th Avenue Corridor study so that the cumulative impact of several individual planning projects could be reviewed comprehensively on the West side of San Francisco. Heretofore, each planning review project was examined on an individual basis and approved on its merits. It is our organizations belief that the 19th Avenue Corridor Study will help the Planning Department and the Western neighborhoods mitigate the combined infrastructure impacts of the Parkmerced, San Francisco State University, 800 Brotherhood Way, 77-111 Cambon, 700 Font (SFUSD), Stonestown, 445 Wawona (Arden Wood) and 1150 Ocean (Balboa Park) projects.

It was the intention of the San Francisco Planning Department to apply the findings of the 19th Avenue Corridor study to developments like the Parkmerced Project and by extension to the Parkmerced DEIR.

City Code requires the Planning Department to review any development consisting of 20 residential units or more and/or 50,000 square feet of retail or commercial space that would be located along or near the southern portion of the 19th Avenue Corridor. The build-out of the above identified development projects is estimated to increase the city's population by about 16,850 persons by 2030. These projects would include about 7,375 residential units, 460,000 gsf of retail uses, 834,000 gsf of institutional/educational uses, 80,000 gsf of office uses, 214,000 gsf of community facilities, and an eight-screen movie theater.

PARKMERCED PROJECT DESCRIPTION: Parkmerced is an existing residential neighborhood with 3,221 residential units on approximately 152 acres of land in the southwest portion of San Francisco adjacent to Lake Merced. The existing on-site residential units are located in 11 towers and 170 two-story buildings. The proposed Parkmerced Project is a long-term mixed-use development program to comprehensively re-plan and redesign the site. The Parkmerced Project would increase residential density, provide a neighborhood core with new commercial and retail services, modify transit facilities, and improve utilities within the development. About 1,683 of the existing apartments located in 11

tower buildings would be retained. The remaining 1,538 existing garden apartments would be demolished and fully replaced, and an additional 5,679 net new units would be added to the Project Site, resulting in a total of about 8,900 units on the Project Site.

WTPCC FINDINGS/TESTIMONY

The WTPCC believes that the Parkmerced Project should be built and can be successfully completed, however; after carefully reviewing the detail in the 19th Avenue Corridor study, the Parkmerced Project DEIR and the financial situation of the developer - Stellar Management - the WTPCC has concluded that: 1) the 19th Avenue Corridor study's findings are overly optimistic and do not accurately represent the ability of the City of San Francisco to provide the infrastructure improvements required to support the proposed growth, and 2) Stellar Management's current financial situation is very weak, and calls into question their ability to actually deliver the proposed project at all. More importantly, the WTPCC feels that the DEIR fails to adequately address the following issues:

14.1

- Project Financial Viability
- Water Delivery Services
- Schools & Education
- Transit Services
- Parking

Financial Viability

We realize that DEIR's do not consider the financial components of a project. However, the net benefit to the City in increased property taxes must be equal to or greater than the cost of providing and maintaining the infrastructure needed to support that development. This must be considered for projects of this size and potential negative impact.

We disagree with the premise that the infrastructure along the 19th Avenue corridor is adequate to support the proposed growth. We also feel that the required improvements to that infrastructure will demand significantly more capital investment than could ever be recovered by the City through the increased property taxes that the growth would result in. The City is requiring that Stellar management, the project developer pay for any property tax shortfalls caused by the project. This is unrealistic as the developer will not have the additional funds needed and we believe that the financial burden of this project will be subsidized by the general fund and ultimately the San Francisco taxpayers.

14.2

Stellar Management is currently in default of its mortgage payments. A Special Servicer, not Stellar Management is controlling Parkmerced's financial assets while they attempt to restructure the developer's debt. Stellar Management has a \$550 million note coming due in October. The Riverton housing complex in Harlem, a 1,228 unit property owned by Stellar Management, was just foreclosed on. The WTPCC is concerned about the Stellar Management's ability to finance and complete this project in a timely manner. Caveat Emptor (Buyer Beware).

Water Delivery Services

We agree with DEIR’s assessment that there will be an adequate water supply for the 16,850 people who will be added to the 19th Avenue corridor by 2030. The term adequate is deceptive in that the average daily per capita water consumption in San Francisco is an already a very low 58.7 gallons of water per day. This is an extraordinarily low amount when compared to the 120 gallons per day used by San Jose residents. The Association of Bay Area Governments (ABAG) growth demands for San Francisco dictate that the average daily water consumption in San Francisco may be as low as 47.8 gallons per day by 2030. This low level of water usage will become a quality of life issue.

San Francisco's new 25 year master water contract, signed in the Summer of 2009, will allow San Francisco only 81 million gallons per day from Hetch Hetchy. The 94.5 million gallons of available water that you are projecting is not reliable and the SFPUC costs to achieve this 94.5 million is cost-prohibitive. The costs to achieve this additional 13.5 million gallons of water (14% increase) through the WISP and Wastewater bonds will double to triple the cost of water and sewage for the average San Francisco consumer. At some point the City is going to have ask if the costs of this additional water and growth is worth burdening the existing population for the 7,375 net housing units that will be added by 2030. The Planning Department will have to monitor city water consumption very closely to make sure that planned growth is feasible AND affordable for the average citizen. The expected high cost of water and sewage will have a tremendous impact on future developments. Once again, the citizens of San Francisco will be subsidizing the Parkmerced development at a very high cost.

14.3

Schools & Education

The 19th Avenue Corridor Study conclusion for “available schooling” is completely inaccurate. The study states:

"The geographic context for the analysis of the development projects' effects on schools is the entire City, because while school assignments take into account parents' preferences, which often include where a student lives, assignment is not necessarily to the closest neighborhood school."

Due to changes in SFUSD admissions policy, proximity to a neighborhood school for elementary and middle-school children will now be prioritized geographically. Showing that there is availability throughout the entire system is no longer relevant. The study needs to show how the additional 1,500 children living in the 19th Avenue Corridor will be able to go to schools in the proximity of their neighborhoods. Under the new SFUSD admission guidelines the schools inside the 19th Avenue Corridor will not be able to adequately service the higher population of children.

14.4

The SFUSD sold off the Frederick Burke Elementary School and thus eliminated the only public school in walking distance to the Park Merced Development. Stellar Management, the Parkmerced developer will be building a new Pre K – 5 school and a day care facility, however, These will not be public schools, and as such should not be considered when calculating the number of students that will be added to the SFUSD. The proposed new private school would not be large enough to adequately meet the needs of the Parkmerced children and children from the surrounding neighborhoods even if it were turned over to the SFUSD to operate.

14.5

San Francisco taxpayers will be subsidizing the costs for new schools to serve the additional residents that Parkmerced will bring to San Francisco.

14.5
con't

Transit Service

It is commendable that Planning reviewed the 4A - 4C tier approaches for the 19th Avenue Corridor plan. All four are good representations of logical and well thought out transportation options. The true test will be the Planning Departments Tier 5 option. As stated in the study, "Subsequent to the evaluation of these four future tiers, a Tier 5 study will be conducted that assesses large-scale and long-term projects to address corridor-wide transportation issues. This study will be scoped and conducted at a later date." It is critical that this Tier 5 study be completed as soon as possible.

14.6

The WTPCC questions the ability of the SFMTA to deliver on its promise of faster transit times. Muni's delivery time has dropped steadily over the last five years. In 2008, the average speed of a Muni bus/train was 9.1mph. The average speed is now 8.75mph and still falling. Declining rates of speed add millions to the costs of operation and continue to make Muni less efficient. Muni light rail used to travel at speeds of up to 55 mph through the West Portal tunnel. Due to poor track conditions, light rail trains are traveling at a much slower rate of speed. Muni may be able to repair rail lines and purchase new buses because of the capital improvement funds that they are and will be receiving. Muni's operational funds are in shambles with Muni running huge operating deficits that may no longer be paid for through State funding. MUNI cut services by an additional 10% on May 1st, 2010. Muni has reduced its operating services by 20% over the last year and more service cuts are expected over the next five years. As Muni's operational budget continues to go deeper and deeper into debt, there is no reason to be optimistic about increases in Muni's service times. At Muni's current reduction rate in operational service, Muni may be operating at 50% of its current service level by the time that the 19th Avenue Corridor development projects are completed, especially the Parkmerced development.

14.7

Muni's lack of service will cause more people to rely on automobiles and create higher rates of traffic congestion and a greater need for parking. People want to get off of the bus, not on the bus. On page III.3 of the 19th Avenue Corridor study states the following, "In addition, the review of operating speeds indicated that bus delays would noticeably increase under Tier 1 and Tier 2 conditions, due to projected congestion levels along the streets. The transportation improvements included in Tier 3, Tier 4A, Tier 4B and Tier 4C would help reduce the travel time increases, but buses would still operate more slowly than they do under existing conditions, which could have impacts on Muni schedule adherence and service reliability."

14.8

The 19th Avenue Corridor study is only evaluating transportation from a capital improvement point-of-view and must consider the SFMTA's operational budget constraints. Federal, State and developer funding will allow the city to proceed and build Tier 5 plan, but operationally Muni will not be able to perform to anticipated standards. We believe that the Planning Department should take a close look at what has happened at St. Francis Circle. This main intersection has the longest stoplight waiting times in San Francisco with traffic stops averaging 90 - 120 seconds. These excessive intersection waits are caused by the Muni light-rail trains running directly through the intersection. MUNI trains traveling across or along 19th avenue and into the Parkmerced development will receive right-of-way priority over

14.9

other types of transportation. Stoplight waits are projected to increase by at least 27 seconds. Parkmerced's increased population density will have a tremendous impact on 19th Avenue traffic.

14.9
con't

The Parkmerced Project includes construction of (or provides financing for construction of) a series of transportation improvements, which include rerouting the existing Muni Metro M Ocean View line from its current alignment along 19th Avenue. The new alignment, as currently envisioned, would leave 19th Avenue at Holloway Avenue and proceed through the neighborhood core in Parkmerced. The Muni M line trains would then travel alternately along one of two alignments: trains would either re-enter 19th Avenue south of Felix Avenue, and terminate at the existing Balboa Park station, or they would terminate at a new station, with full layover and terminal facilities, constructed on the Parkmerced Project Site at the intersection of Font Boulevard and Chumasero Drive.. Although the cost is anticipated to be four times greater, the Planning Department's Tier 5 plan should analyze having the Muni light-rail trains go underground at the Ocean Avenue intersection and going into Park Merced. The Tier 5 plan should also consider connecting the M Ocean View line to the Daily City Bart Station.

14.10

Due to Stellar Managements current financial situation, it is questionable whether they will be able to afford to build these track extensions and additional stations or purchase the additional Muni trains that their agreement with the city will require. If Stellar Management does build the stops, San Francisco will still have to pay the future operation and maintenance costs. If the developer cannot complete the transit extension, San Francisco will be forced to pay for the extension and possibly more trains.

14.11

Parking

The 19th Avenue Corridor plan is projecting that there will be a substantially greater parking demand primarily focused near Stonestown, SFSU and Parkmerced. The study states, "It is likely that both SFSU and Parkmerced will have a substantial parking shortfall. As a result, the unmet parking demand in the area would tend to spill over into the adjacent residential neighborhoods, exacerbating any current parking problems." The bicycle lanes installed along Holloway Avenue would also reduce existing parking. Under new city planning guidelines parking is almost eliminated from the Balboa Park development and is rationed by income at Parkmerced. City Planning's insistence on higher density housing developments with limited parking will only discourage a limited number of people from owning an automobile. The Parkmerced Project has a one parking spot per apartment spot component. Additional cars will be warehoused in existing neighborhoods. As Muni fare costs soar and service becomes more constricted and unreliable, development residents will purchase MORE cars and have less incentive to ride Muni. Parking along the 19th Avenue Corridor and in the surrounding neighborhoods will be horrendous.

14.12

CONCLUSION

The WTPCC wants to again thank the San Francisco Planning Department for producing such a detailed plan of the 19th Avenue Corridor developments. However, we disagree with the overall finding of the study that supports the proposed growth by making overly optimistic estimations of the ability of the City of San Francisco to deliver the infrastructure improvements necessary to support this growth. We are concerned that the Planning Departments desire to facilitate increased housing density along 19th Avenue (in order to meet housing growth metrics prescribed in the 2009 Housing Element) may lead to

unintended negative consequences with respect to the City's financial wellbeing, water availability, schools and education, mass transportation operations and parking.

The WTPCC supports the Parkmerced Project but believes that the project is hampered by the current economy, the financial strength of Stellar Management and the San Francisco Planning Departments over-optimistic analysis of the infrastructure support that the City of San Francisco can provide to the Parkmerced Project.

Sincerely,

George Wooding
President, West of Twin Peaks Central Council

RESPONSES TO LETTER 14

West of Twin Peaks Central Council, George Wooding, President, July 11, 2010

Response 14.1

This comment notes that the improvements proposed as part of the *19th Avenue Corridor Study* are ambitious and questions the ability of the City and/or Project Sponsor to fund and implement the improvements. The *19th Avenue Corridor Study* is intended to provide a more comprehensive view of the changing patterns of transportation growth in a broad area of southwest San Francisco, roughly between the Daly City/San Mateo County line and Sloat Boulevard. The Study identifies the land use changes and population/job-related transportation growth of the Proposed Project and other large projects in the *19th Avenue Corridor*, along with estimated “background” transportation growth over a 20-year horizon. This provides a broader context for analysis, which informed the analysis of the Proposed Project’s transportation impacts. The *19th Avenue Corridor Study* also suggests conceptual-level transportation improvements that may not be fully funded or developed beyond a high-level concept, but that represent possible solutions to transportation problems beyond the reasonable reach of any potential transportation impacts associated with any one project, including the Proposed Project. The *19th Avenue Corridor Study* is not a component of the Proposed Project.

In general, the Proposed Project includes more immediate-range, locally sited transportation proposals that are fully funded and analyzed for potential environmental impact attributed specifically to the Proposed Project itself. These proposals are components of the *19th Avenue Corridor Study*, in addition to broader, more conceptual and unfunded projects that may or may not be considered for long-term implementation.

The benefits of the *19th Avenue Corridor Study*’s comprehensive, corridor-wide analysis and possible transportation concepts are two-fold: they not only provide a richer context for analysis of the Proposed Project, they also may suggest refinements to Project proposals so that they could support, and not likely preclude, or conflict with, the future development of a project’s proposal into a more fully realized, farther-reaching transportation solution envisioned in the *19th Avenue Corridor Study*. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, for additional discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

Response 14.2

The comment expresses concern about the Project Sponsor’s ability to complete the Proposed Project and implement the proposed mitigation measures, particularly in light of the City’s request that the Project Sponsor pay for any property tax shortfalls caused by the project. The

City has already calculated the Proposed Project's effects on the general fund and tax revenues which would be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.¹ Also, see Response TR.1.2, in Section III.B, Public Hearing Comments and Responses, for additional discussion on the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures.

Response 14.3

The comment raises comments on the City's future water demand and costs to provide water supplies and wastewater treatment to its residents. As stated in the EIR in Section V.K, Utilities and Services Systems, p. V.K.2, a Water Supply Assessment (WSA) was prepared to consider the San Francisco Public Utilities Commission's (SFPUC) current and projected supplies in light of projected demands associated with new growth not included in the 2005 Urban Water Management Plan (UWMP). As described in the EIR on p.V.K.16, the Proposed Project's total water demand of 0.98 million gallons per day (mgd) would account for approximately 1.0 percent of the total retail demand in 2030. This analysis assumes that recycled water would be used for 0.33 mgd of the 0.98 mgd. The current potable water demand from the Project Site is 0.71 mgd; the net increase would be approximately 0.3 percent of the total future retail demand of approximately 93.5 mgd. This increase would not affect the ability of the SFPUC to serve its retail customers.

The EIR, pp.V.K.17-18, also states that the buildout of the Proposed Project and other cumulative projects in the area is estimated to increase the City's population by about 16,850 persons by 2030. The assumptions and projections in the WSA consider cumulative growth throughout San Francisco's retail water delivery system, which includes all retail users in San Francisco, and retail customers in San Mateo County, such as the San Francisco International Airport, and a few in Alameda and Tuolumne Counties. (Note that the SFPUC also supplies water to 27 wholesale water agencies in the Bay Area; including both the retail and wholesale customers, it serves a total of over 2.4 million people.) The WSA found that the City's water supply is sufficient to meet cumulative projected demand from anticipated growth in the City through 2030 in all but the second and third year of a multiple dry-year period. The deficit in multiple dry years would be due to existing demand plus demand from anticipated future growth in population and employment in Parkmerced and other areas of the City.² As stated on p. V.K.17, during multiple dry-year periods, the SFPUC would need to implement demand management and water

¹ CBRE, *Parkmerced Fiscal and Economic Impact Analysis Overview*, September 2010. A copy of this report is available for public review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, as part of Case File 2008.0021E.

² See Appendix D in this EIR, *Final Water Supply Assessment for the Proposed Parkmerced Project*, November 2009, pp. 4-4 and 5-2.

conservation measures, which could include voluntary rationing or the curtailment of retail deliveries. With the implementation of these measures during multiple dry-year periods, existing and projected future water supplies would be sufficient to meet estimated future water demand.

CEQA does not require financial costs analysis to be included or analyzed in the EIR. Therefore, the EIR does not include a future cost evaluation of water (or sewer) services. The Planning Department does not monitor costs of providing City utility services. Water and wastewater facilities are provided and managed by the San Francisco Public Utilities Commission.

Response 14.4

The comment indicates that the analysis of district-wide school capacity in relation to the future school-aged population in the Project Area is no longer appropriate because of the change to the district school assignment system. The new school assignment system is described in the EIR in Section V.L, Public Services, on p. V.L.20. The updated school assignment system uses the student's home address, their prioritized school requests, and a set of preferences to assign students to their highest ranked elementary school. The set of ranked preferences are, in order, attendance of older siblings in the preferred school, San Francisco Unified School District Pre-K enrollment in the attendance area of the preferred school, resides within a low-scoring census tract, resides in the attendance area of the preferred school, and resides in an attendance area without sufficient capacity. The San Francisco Unified School District will publish new school attendance area maps in November 2010, as well as finalize the middle school feeder system and the transportation policy.

Enrollment and capacity numbers for the different public elementary schools, middle schools, and high schools in the southwestern portion of the City are provided on pp. V.L.20-V.L.21. Also identified are the high school, middle school, and elementary school that currently serve the Project Site, i.e., the Project Site is within the defined attendance areas for Lincoln High School, Aptos Middle School, and Ortega Elementary School. The 2000 Census information indicating the number of school-aged children in the Lakeshore area, which includes the Parkmerced neighborhood, is also provided on p. V.L.21. The analysis of project-related impacts is provided on pp. V.L.24-V.L.26, and is a conservative analysis because it assumes that all students would attend public school and none would be private school students (approximately 30 percent of school-age students were enrolled in private schools in 2007 (p. V.L.18)). The EIR acknowledges that enrollment requests for some schools in the southwest area of the city exceed the capacity of these schools (p. V.L.24).

The analysis in the EIR explains that parents and students would develop a set of preferred schools (and if they happen to be in the attendance area of the preferred school, the new assignment system gives preference) with the understanding that there will continue to be high

demand and low demand schools and some students may not get one of their choices. Under the new assignment system, students who are not assigned to one of their choices will be assigned to their attendance area school if it still has openings after the choice process, or to the school closest to where they live that has openings. Thus, although there may be capacity issues at individual schools in the southwest area, there is district-wide capacity to accommodate the elementary, middle, and high school students generated by the Proposed Project and other foreseeable projects. However, with the new student assignment system, an incoming student would likely have a better chance to attend a school closer to their home than under the previous assignment system.

Response 14.5

The comment suggests that the proposed new private school not be included in the analysis of demand for school facilities, and states that the proposed new private school would not be large enough to meet the needs of children from Parkmerced and surrounding neighborhoods. As stated in the EIR in Section V.L, Public Services, on pp. V.L.23-V.L-24, the impact analysis assumes that 100 percent of the project-generated school-aged children would attend an existing SFUSD school, and concluded there would be sufficient capacity in existing SFUSD school facilities for the additional students as a result of the Proposed Project. Thus, the potential development of the K-5 private school is not incorporated into future school capacity, thus the analysis presented is based upon a conservative scenario.

The comment also states that San Francisco taxpayers will be subsidizing the costs for a new school to serve the additional residents that the Proposed Project would bring to San Francisco. As stated on p. V.L.25, the Proposed Project would result in an additional 532 elementary school, 266 middle school, and 354 high school students; however, these increases would not create a need for additional school facilities within the SFUSD system.

Response 14.6

The comment identifies the need for the Tier 5 option of the *19th Avenue Corridor Study*. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

Response 14.7

The comment states that Muni may not be able to provide the levels of transit service assumed in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 2.5, for discussion of the validity of future Muni service assumptions, as well as Section 4 of the

Master Response for discussion of funding for transit improvements included in the Proposed Project.

Response 14.8

The comment states that a reduction in Muni service would result in more auto traffic. As discussed on pp. V.E.27-V.E.28 in the EIR, one of the primary causes of slower transit speeds is severe auto congestion. If auto congestion increases to the point that transit travel speeds are also severely affected, it is reasonable to assume that auto travel would also become similarly less desirable. Therefore, since both auto travel and transit travel may deteriorate, it cannot be assumed that a substantial shift from transit to auto travel would occur.

Response 14.9

The comment requests considerations of the financial operational costs of implementing Tier 5 of the *19th Avenue Corridor Study*. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1 for discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study* and Section 4 of the Master Response for discussion of funding of transit improvements included in the Proposed Project.

The comment also references delays to traffic caused by providing transit signal priority where vehicles cross *19th Avenue*. The effects of this priority on traffic signal timing was accounted for in the intersection level of service analysis, which informed the assessment of traffic and transit service impacts. Refer to Appendix F in the *Transportation Impact Analysis Report (TIAR)* Technical Appendix, prepared for the EIR, for detailed level of service calculation sheets, which include intersection signal timing information.

Response 14.10

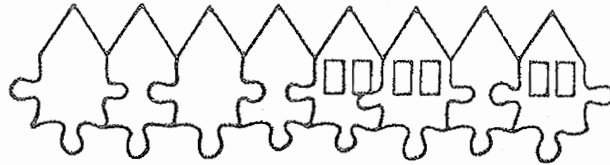
The comment states that Tier 5 of the *19th Avenue Corridor Study* should examine grade separation for rail crossings. Please refer to Response TR.31.2 for a discussion of grade-separation of light rail vehicles and Master Response A.2, Transportation and Circulation, Section 3.1, for discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

Response 14.11

The comment expresses concerns regarding the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures, including the transit extension. Please see Response TR.1.2 for a discussion of this issue.

Response 14.12

The comment asserts that parking conditions would worsen more than anticipated by the Draft EIR due to Muni service problems. See Response 14.8 for discussion of the relationship between traffic congestion and transit service quality deterioration. The parking supply and demand analysis discussed in the EIR is based on the best information available to the analysts. Furthermore, as stated on pp. V.E.104-V.E.105, lack of available parking supply is not considered a significant environmental effect under CEQA. Please refer to Master Response A.2, Transportation and Circulation, Section 2.3, for discussion of the Proposed Project's anticipated parking supply and demand.



AFFORDABLE HOUSING ALLIANCE
76 Stanford Heights • San Francisco, CA 94127

RECEIVED

July 12, 2010

JUL 12 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street
San Francisco, CA 94103

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

Re: Comments on Draft Environmental Impact Report (DEIR) for the Parkmerced Project (SFPD File No. 2008.0021E)

Dear Mr. Wycko,

The over 1,500 units at Parkmerced proposed to be demolished are irreplaceable.

First, they were built with 1940's and 1950's dollars spent on 1940's and 1950's construction costs. Today we can't touch that.

Second, these existing 1,500 plus rent-controlled and eviction protected units are irreplaceable because of the Costa Hawkins Act and the Ellis Act.

You can't control the rents of the new units under Costa Hawkins, or even assure that they remain rental units under Ellis.

15.1

Palmer, an inclusionary zoning case with which you are likely familiar, and Embassy Suites v. Santa Monica, a case about Santa Monica's ability to enforce rent restrictions included in a settlement agreement, which was just decided a few weeks ago, make that clear.

You won't be able to control the rents on the new units unless you subsidize the units with a direct financial contribution.

You also won't be able to assure that the new rental units remain rental units, and are not sold as market rate condominiums, unless you subsidize them with a direct financial contribution.

15.2

Is the City planning to subsidize all these new units in order to assure that they remain rent restricted rental units?

Given the recent case law, it is highly uncertain that a Government Code development agreement will be effective in overcoming the barriers created by the Costa Hawkins and Ellis Acts.

15.3

If someone somehow proposed a project of 1,500 plus rent controlled 1 and 2 bedroom family units we'd all be drooling over it. But you want to throw that all away -- the money and the work and the materials already used and expended. That is not "green".

And the loss of over 1,500 rent controlled units is a significant impact that isn't going to be mitigated because the rent restrictions on the new units will be unenforceable.

15.4

Sincerely,



Mitchell Omerberg
Executive Director

RESPONSES TO LETTER 15

Affordable Housing Alliance, Mitchell Omerberg, Executive Director, July 12, 2010

Response 15.1

The comment asserts that rent-control protections on replacement units are unenforceable under recent judicial decisions, and therefore cannot be assured. Please refer to **Responses TR.2.2** and **TR.20.2**, in Section III.B, Public Hearing Comments and Responses, for a discussion of rent-control protections on replacement units.

Response 15.2

The comment asserts that the rent protections proposed for the 1,538 replacement units are unenforceable. As noted above, please refer to Responses TR.2.2 and TR.20.2.

Response 15.3

The comment asserts that rent-control protections on replacement units are unenforceable under recent judicial decisions, and therefore cannot be assured. As noted above, please refer to Responses TR.2.2 and TR.20.2.

Response 15.4

The comment asserts the loss of over 1,500 rent-controlled units is a significant, unmitigatable impact. As described in **Response TR.2.2**, of the 3,221 existing units on the Project Site, 1,683 units would be retained as part of the Proposed Project. These units are all located in the 11 existing tower buildings. The remaining 1,538 replacement units, which are all located in the garden apartments, would be demolished and replaced with new apartments, and about 5,679 net new units would be added under the proposal. As analyzed in Section V.C, Population and Housing, development of the Proposed Project would not displace existing Parkmerced residents and thus, would result in a less-than-significant impact to population and housing. Under a proposed development agreement, which is proposed as part of the Proposed Project, residents of existing apartments that are proposed to be replaced would be provided with the opportunity to move to a new apartment before their unit is demolished. Construction and demolition would be phased to ensure that the residents of these units would be required to move into a new apartment only once. These replacement units would be rented at the same rent-controlled rate as the residents' existing apartments prior to demolition and would be covered by the same restrictions on rent increases as contained in the San Francisco Rent Control Ordinance. Thus, there would continue to be 3,221 permanent rent-controlled apartments on site following implementation of the Proposed Project. Relocation of residents from one rent-controlled unit to another unit is not considered a significant impact under CEQA.



SAN FRANCISCO
ARCHITECTURAL
HERITAGE

July 12, 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Re: 2008.0021E: Parkmerced – Draft Environmental Impact Report

BOARD OF
DIRECTORS

Charles R. Olson
President

David Cannon
Vice President

Scott Haskins
Vice President

Carolyn Kiernat
Secretary

Jon Knorpp
Treasurer

Kathleen Burgi-Sandell

Alicia N. Esterkamp

Jeff Gherardini

Nancy Goldenberg

D. Michael Kelly

Frederic Knapp

Daphne Kwok

Benjamin F. Ladomirak

Arnie Lerner

Thomas A. Lewis

Chandler W. McCoy

Patrick M. McNerney

Willett Moss

Mark Paez

Michael Painter

Mark P. Sarkisian

Neil Sekhri

Zander Sivyer

Christopher VerPlanck

David P. Wessel

Dear Mr. Wycko,

Thank you for the opportunity to comment on the Parkmerced Draft Environmental Impact Report (“DEIR”). Founded in 1971, San Francisco Architectural Heritage (“Heritage”) is a non-profit 501(c)(3) membership organization charged to preserve and enhance San Francisco’s unique architectural and cultural identity.

The Parkmerced project sponsor presented to the Heritage Issues Committee on June 2, 2009. While the proposed project has many laudable goals, we noted that it did nothing to preserve the existing California Register eligible resource. After review of the Page & Turnbull Historic Resources Alternatives Study (“Alternatives Study”), and the DEIR we have feedback on potentially feasible preservation options, including a new alternative described here. This new alternative would be a “hybrid” of options from the Alternatives Study that would allow limited development along the periphery of the complex (as described in DEIR Alternative C) along with limited infill development within the Historic District (similar to alternative #3 in the Alternatives Study, though scaled down). This hybrid approach would both retain Parkmerced’s historic core and retain its California Register eligibility, while meeting many of the stated project objectives.

If the city will not consider this hybrid alternative, Heritage supports Alternative C as the recognized environmentally superior alternative, and the only option included in the DEIR that maintains the eligibility of Parkmerced as a California Register historic district.

16.1

I. Parkmerced Is Historically Significant and Register Eligible

All parties, including the project sponsor, agree that Parkmerced is eligible for inclusion in the California Register of Historical Resources as a historic district under Criterion 1 (Events) and Criterion 3 (Design/Construction). Built in the early 1940’s, Parkmerced is an outstanding example of early modern landscape design, and an exceptional garden apartment development. Parkmerced’s sophisticated landscape was designed by Thomas Church, the father of modern landscape design. It displays many of the design concepts that made Church’s work unique and influential, including the use of abstract and organic forms. It is believed to be one of the largest Church projects remaining intact.

As an example of a planned development, Parkmerced represents an early example of large scale garden apartment design. It was one of similar four apartment developments funded by Metropolitan Life Insurance, which include Parkfairfax in Alexandria, Virginia, listed on the National Register because of its significance as an early planned development. Of the four complexes, only Parkmerced has a notable landscape design. Most of the complex's features retain a high degree of integrity from MetLife's period of ownership and, taken together, its collection of buildings, landscapes, and associated elements reflect Parkmerced's original design and functionality as a planned residential community.

II. The EIR Should Scrutinize the Ability of the Proposed Project to Meet Sustainability Objectives

To ensure fair consideration of the preservation alternatives Heritage supports (as described below) the EIR should evaluate the proposed project's ability to meet the sponsor's own stated objectives. The proposed project seeks to meet LEED certification standards and is touted as an "innovative model for environmentally sustainable design practices." We question how sustainable it is to demolish over 170 two-story buildings and 152 acres of landscape features and open space. Clearing the site would likely take several years, followed by protracted excavation and construction work. The EIR should closely scrutinize any claimed environmental benefits of the proposed project within this context, taking into account the embodied energy that would be lost with demolition of 1,538 units and the additional resources needed to haul away debris and erect 5,679 new units.

16.2

While the project sponsor has plans to build new construction with green technology, the DEIR does not study the possibility of upgrading the existing buildings to meet sustainability objectives. In assessing the feasibility of preservation options, the EIR should explore options for greening the existing garden courtyard apartments. Sensitive strategies for improving energy performance should be incorporated into all preservation alternatives. Including LEED upgrades for all the existing buildings, regardless of the final project design, will certainly help the project sponsor to meet sustainability objectives.

III. There Are Feasible Alternatives to the Proposed Project that Substantially Lessen Significant Adverse Impacts on Historic Resources

A. The EIR Should Consider a "Hybrid" Alternative that Retains Parkmerced's Historic Core, While Meeting Stated Project Objectives

Other than the No Project Alternative, the DEIR only includes one option (Alternative C) that would avoid significant adverse impacts on historic resources. In order fulfill the

mandate of CEQA,¹ the EIR should explore an additional alternative that retains Parkmerced’s historic core and meets more of the sponsor’s objectives, such as the desire for sustainable density and affordable rental housing.

16.3

A hybrid of Alternative C and the rejected Alternatives Study option, “Infill Development within the Historic District,” would not only maintain the eligibility of the historic district, but also attain key project objectives not met by Alternative C alone. The “Infill Development” alternative was rejected, in part, because it would render the Parkmerced historic district ineligible for listing in the California Register. A hybrid alternative that allows for infill development on a smaller scale – as opposed to the three-story-plus new construction proposed in the rejected “Infill Development” alternative – would largely avoid negative impacts on the integrity of setting. Moreover, by adjusting the footprint of Alternative C, a hybrid alternative would increase the amount of developable area by removing the courtyard blocks immediately north and south of the four-tower cluster bounded by Serrano Drive, Arballo Drive, Gonzalez Drive, Bucareli Drive, and Font Boulevard.

16.4

Based on the impacts analysis in the DEIR for Alternative C, the removal of these courtyard blocks would not jeopardize the eligibility of the historic district. In addition to retaining the central core, the majority of the character-defining features would be preserved, including the cluster arrangement of the garden apartment blocks, landscaped drives, landscaped courtyards, vegetation, and small-scale features, as well as the radial arrangement of the garden courtyard apartments around Juan Bautista Circle.

Historic preservation and other General Plan goals, such as sustainability and affordable housing, can work together at the Parkmerced site with creative solutions. A hybrid alternative that incorporates elements of Alternative C and the rejected “Infill Construction” option would realize many of the project sponsor’s objectives, while still retaining enough historic fabric to maintain the site’s eligibility on the California Register. We urge the city to study this option in detail to assure that a reasonable range of potentially feasible alternatives are included in the EIR.

B. Alternative C Maintains California Register Eligibility and is the Environmentally Superior Alternative

Should the city not analyze this hybrid alternative, Heritage supports Alternative C, “Historic District Central Core,” as the most sensitive option from a preservation standpoint, and as the recognized environmentally superior alternative. As the

16.5

¹ CEQA requires consideration of a range of alternatives in the EIR, with an emphasis on options capable of “substantially lessening” the project’s significant adverse environmental effects. *Sierra Club v. Gilroy City Council* (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.

Alternatives Study indicates, Alternative C would retain the essential portions, features and characteristics of Parkmerced that justify its eligibility for the California Register of Historic Resources as an historic district. It also advances the project sponsor's sustainability objectives by conserving embodied energy and reducing energy consumption and landfill debris.

Finally, in assessing the financial feasibility of Alternative C, the EIR should take into account the cost savings that would result from maintaining the existing stream of rental revenue and by significantly reducing the scope of new construction. The EIR should also include a detailed accounting of projected rehabilitation costs for all preservation alternatives, incorporating potential regulatory and tax relief available under the California Historical Building Code, Mills Act, Federal Rehabilitation Tax Credits, and through conservation easement donation.

16.5
con't

IV. Additional Mitigation is Needed to Safeguard Against Preemptive Demolition

Given the widely publicized financial uncertainty surrounding the proposed project, we urge the city to adopt protections against any preemptive demolition of Parkmerced, including a mitigation measure barring issuance of any demolition permit for any phase of construction until a permanent replacement project is pending and the sponsor has demonstrated the financial resources necessary to complete the proposed replacement project within a reasonable timeframe (i.e., construction to commence within six months of receipt of all necessary city approvals).

16.6

Thank you very much for the opportunity to comment. Please do not hesitate to Alexandra Bevk, Preservation Advocate, at 415.441.3000 or abevk@sfheritage.org should you have any questions or need additional information.

Sincerely,



David Cannon
Chair of Issues Committee

Cc: San Francisco Planning Department
San Francisco Historic Preservation Commission
National Trust for Historic Preservation
California Preservation Foundation

RESPONSES TO LETTER 16

**San Francisco Architectural Heritage, David Cannon, Chair of Issues Committee,
July 12, 2010**

Response 16.1

The comment states that if additional or hybrid alternatives are not considered in the Draft EIR, the preference among the presented alternatives is Alternative C, as it is the only option included in the Draft EIR that maintains eligibility of the site as a California Register-eligible historic district. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project. Please also see Master Response A.4, Alternatives, in Section III.A, Master Responses.

Response 16.2

The comment questions the Proposed Project's ability to meet its sustainability objectives, particularly with the planned demolition of the existing buildings and open space, and further states that the EIR should explore different environmentally sustainable design practices that includes the possibility of upgrading the existing buildings to improve energy performance. As summarized in Chapter III, Project Description, p. III.1, all 1,538 of the existing two-story garden apartments, as well as associated parking, building services, a leasing/operations office, and a private pre-school/day care facility, are proposed to be demolished. The Proposed Project would be required to use construction techniques intended to reduce carbon emissions and minimize the waste of materials. In addition, energy and greenhouse gas emissions embodied in waste material and generated by demolition and construction activities for the Proposed Project would be partly or wholly offset by the more energy-efficient operation of the new structures and by the reduced per capita transportation energy consumption that can result from increased residential density. Please also see Response TR.25.6, in Section III.B, Public Hearing Comments and Responses, for a similar discussion on this issue.

The above comment suggests analysis of different environmentally sustainable design practices in the EIR. The intended purpose of an EIR is to inform public agency decision-makers and the public of the significant environmental effects of a defined project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. While an EIR does not redefine a Proposed Project, it does provide a range of alternatives to the project that are capable of reducing or eliminating any significant effects of the proposed project identified in the EIR. Alternative sustainable design practices were not specifically analyzed in the Draft EIR, because the range of alternatives analyzed were developed in response to significant and unavoidable environmental impacts, including identified historic resource impacts. An alternative that also incorporates sustainability features, such as upgrades to existing

buildings would not necessarily lessen significant and unavoidable impacts, however this does not preclude decision-makers from including such features as part of any decision to approve an alternative to the Proposed Project.

Response 16.3

The comment requests analysis of an additional alternative in the Draft EIR that retains Parkmerced's historic core and meets more of the Project Sponsor's objectives. The Draft EIR includes analysis of Alternative C, Retention of the Historic District Central Core. The purpose of this alternative is to analyze an alternative, as required by CEQA, that fully mitigates impacts to the identified historic resource. As analyzed, Alternative C fully mitigates impacts to the identified historic resource. Inclusion of other programmatic elements to meet more of the Project Sponsor's objectives would not further lessen the significant and unavoidable historic resources impacts identified in the Draft EIR. However, this does not preclude decision-makers from including such features as part of any decision to approve an alternative to the Proposed Project. Please also see Master Response A.4, Alternatives.

Response 16.4

The comment requests analysis of the Infill Development within the Historic District alternatives in the Draft EIR. As stated in Response 16.2, an EIR is required to analyze a reasonable range of alternatives to a proposed project that could feasibly attain most of the basic project objectives, and would avoid or substantially lessen one or more of the significant environmental effects of the Proposed Project. Every conceivable alternative to a project does not need to be considered. The main purpose of presenting a range of alternatives is to focus on alternatives that are capable of reducing or eliminating any significant effects of the proposed project identified in the EIR, and to foster informed decision-making and public participation. Please also see Master Response A.4, Alternatives.

Response 16.5

The comment expresses support for Alternative C, the Historic District Central Core Alternative, and states that the Draft EIR should assess the financial feasibility of this alternative and should take into account the cost savings that would result from maintaining the existing stream of rental revenue. CEQA does not require such a financial analysis to be included in the EIR. Financial evidence would only be required if the City explicitly finds that Alternative C is financially infeasible when approving the Proposed Project. Please also refer to Response 2.4 for additional discussion about why the EIR does not include a detailed financial analysis of Alternative C.

Response 16.6

The comment states that the mitigation measures for historic resources described in the Draft EIR are inadequate, including the omission of preemptive demolition that would prohibit issuance of a demolition permit until the Project Sponsor demonstrates the financial resources to complete the proposed replacement project. Revisions to Mitigation Measure M-CR-1 are therefore included as text changes to the Draft EIR to ensure that a demolition permit will not be issued until a building permit for the replacement buildings is approved (see Master Response A.1, Historic Resources, pp. III.A.13-III.A.14). These modifications to the mitigation measure in the Draft EIR assist in reducing the impacts, but would not reduce the impacts to a less-than-significant level and do not change the conclusions of the EIR. The Proposed Project would still have a significant, direct and cumulative, unavoidable impact on historic resources at the Project Site. Please also see Master Response A.1, Historic Resources.



San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

July 12, 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

RE: Comments on Draft EIR for Parkmerced Project 2008.0021E

Dear Mr. Wycko:

San Francisco Tomorrow is submitting the following comments on the Draft Environmental Impact Report for the Parkmerced Project.

Lifespan of project, at twenty to thirty years, is too long; if the impacts are to be mitigated effectively, they cannot be covered in a single massive environmental analysis such as this one; the time horizon for the project should be reduced to seven or at most ten years, to permit realistic mitigations to be imposed, as members of the Planning Commission have suggested;

17.1

Plans and Policies

We disagree with the statement (IV.1) that this project is consistent with Proposition M, as approved by voters. Specifically, we find that this project inconsistent with the following policies

- Conservation and protection of existing housing and neighborhood character to preserve the cultural and economic diversity of neighborhoods;
- Preservation and enhancement of affordable housing;
- Discouragement of commuter automobiles that impede Muni transit service;
- Maximization of earthquake preparedness;
- Landmark and historic building preservation
- Protection of parks and open space and their access to sunlight and vistas

17.2

Land Use. It is inappropriate for this document to label the wholesale change of an existing neighborhood as a "less than significant" impact.

17.3

True neighborhoods evolve over time and Park Merced has a social infrastructure that can be built upon. In the mode of Jane Jacobs, the variety/ scale of buildings over time creates a sense of place---providing some assurances of marketability rather than the risk of a suburban enclave

Will you want to live in San Francisco – tomorrow?

41 Sutter Street, Suite 1579 . San Francisco CA 94104-4903 . (415) 566-7050

Recycled Paper





San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

of unknown quality. Large-scaled demolition has not been the best course, e.g. large Redevelopment areas like the Lower Fillmore, Western Addition, Golden Gateway Center have destroyed community in Sa Francisco. Maintaining the Victorian Houses/ Neighborhoods and adding infill density would have retained the community vibrancy that already existed, the ethnic and cultural diversity. The document does not reflect what the City has learned about redevelopment over the past half-century, instead relying on the failed model of the Western Addition redevelopment as a template for transforming the existing Parkmerced neighborhood.

17.3
con't

The tripling of housing units will significantly impact not just Parkmerced, but also adjacent neighborhoods; replacing most of the existing landscape will change the atmosphere of the development.

17.4

Introducing significant retail and office space is a significant change in use in an area that whose predominant uses are residential and recreational. This not only changes the character of Parkmerced, but will impact local retail districts, including Stonestown, Ocean Avenue and West Portal.

17.5

Visual Quality ("Aesthetics" can be a pejorative term and may affect the judgment of the reader in a negative way. Please use "Visual Quality".)

17.6

Urban Design. It is only partly possible to assess the design impact of demolishing the buildings which comprise the integrity and unity of the original design. Computer renderings of the proposed massing are given in Chapter V as comparison but not many of them are taken from inside the project area; the distant views taken at points do not allow useful comparisons to be made of the proposed new buildings with the existing building character.

17.7

It is inappropriate that the Appendix show possible architectural character by inserting clippings of buildings that have been built elsewhere; these clippings-from-other-places are irrelevant since no architectural drawings have been developed for the proposed project; they should not be included in the EIR as if they could predict the eventual appearance and style of the proposed new buildings at this site. Random beautiful graphics are a fiction; they are merely stand-ins for the real thing but they might be powerful in impressing the public and persuading decision-makers. Even with disclaimers, these beautiful images are powerful and may result in a loss of objectivity and thus are not allowable in an EIR.

17.8

Open Space and Greenscape. There is almost no greenscape to be seen in either the internal or external vistas. The transformation of the site from a predominantly green to a predominantly built environment is a significant, unmitigable change. The removal of trees will affect the microclimate. The placement of wind turbines along Brotherhood Way and Lake

17.9
17.10
17.11
17.12

Will you want to live in San Francisco – tomorrow?

41 Sutter Street, Suite 1579 . San Francisco CA 94104-4903 . (415) 566-7050

Recycled Paper





San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

Merced Boulevard would extend that transformation beyond the borders of the project will take place after the removal of substantial, mature trees, with wind, shadow and visual impacts. This is a significant visual impact.

17.12
con't

Parkmerced is a major visual gateway into San Francisco from the south; that is not reflected in the Viewpoint D, which shows a forbidding wall of highrises greeting visitors entering the City on 19th Avenue and Lake Merced Boulevard.

17.13

Population and Housing. The analysis is deficient in its assessment of the impacts of this project in on the availability of affordable housing. Among the problems;

17.14

- a. The City currently lacks a valid Housing Element, therefore lacks an assessment of the real needs or shortfalls of affordable housing.
- b. The pre-emption of current family housing for use as student housing for SFSU is neither identified nor studied here.

17.15

c. Demolition of 1500 units of rent-controlled housing is a significant impact that is only temporarily mitigated by the extension of rent control to current tenants in new units, since those units will no longer be subject to rent control once the original tenants leave.

- a. The provision of 852 units of below market housing is not sufficiently described. We are only told that the units will be "affordable to households earning up to 120% of the Area Median income." There is no indication of what percentage, if any, of these units will be affordable to Low or Very Low Income Households, nor what type of households would be accommodated.

17.16

- b. The California Supreme Court's ruling against inclusionary zoning in *Palmer/Sixth Street Properties v. City of Los Angeles* (2009) calls into question whether the proposal for below market rate housing in the preferred alternative is even possible. The impact of this decision on that alternative should be analyzed and alternatives proposed. It is not clear that any proposal that retains private ownership of the land on which the affordable housing is provided will survive legal challenge.

Historical Architectural Resources. We appreciate that the document agrees this project would result in a significant and unavoidable impact; the destruction the potential historic landscape of Parkmerced, designed by renowned landscape architect Thomas Church, including the semi-private courtyards of the two-story high townhouses, would be lost. The destruction of the historic landscape would mean a significant loss of cultural resources which cannot ever be replaced.

Preservation Alternative "C" is not satisfactory to address the historic resource and the eligibility of this project for the National Register. "C" offers a random slice of partial preservation, the

17.17

Will you want to live in San Francisco – tomorrow?

41 Sutter Street, Suite 1579 . San Francisco CA 94104-4903 . (415) 566-7050

Recycled Paper





San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

rationale for which within the proposed new site plan is nowhere to be found. Other preservation alternatives should be studied, including the one labeled "G" which was dropped from the document.

17.17
con't

Trees. Although the DEIR acknowledges that the site contains many mature trees, it summarily states that they are not landmarked; this does not mean that they are not worth a study which would indicate the trees that might be retained. In the harsh climate near the ocean, it would take decades to replace these trees with similar mature trees.

17.18

Transportation and Circulation. It is clear that the current density of the project creates significant transportation impacts. The transportation study indicates that main arteries (19th Avenue/Junipero Serra leading to HW 280 and Parkmerced Boulevard) will be impacted at Level E and Level F due to the population increase of the Parkmerced project and the cumulative impacts of additional projects on the parcels sold off from the original Parkmerced property. There are other projects in the pipeline, as well, which will further impact the circulation of San Franciscans trying to reach the Peninsula and SFO and automobiles commuting from Marin County to the Peninsula.

17.19

No Transit First proposal that restricts parking and increases transit has been identified.

17.20

The project should also be analyzed for its consistency with the 19th Ave/Park Presidio Transportation Plan prepared by the County Transportation Authority and San Francisco Municipal Transportation Agency. The rerouting of the M-line through Parkmerced would require an additional crossing of MUNI tracks of 19th Avenue and cause additional slowdown of vehicular traffic. An alternative could show a crossing at below grade.

17.21

Shuttles into Parkmerced to serve the residents on an as-needed basis should be studied.

17.22

The impacts of re-routing the M-line through Parkmerced, which will require additional crossings at 19th Avenue and result in additional slowdown of vehicular traffic there, are not fully evaluated. This proposal runs counter to the goals of the 19th Avenue Corridor Study, which is heavily footnoted in this section but not referred to in the body of the analysis. For instance, that study proposes a west side alignment for the M line that would improve pedestrian safety and access to the line.

17.23

Alternatives. Preservation Alternative "C" is not satisfactory to address the historic resource and the eligibility of this project for the National Register. "C" offers a random slice of partial preservation, the rationale for which within the proposed new site plan is nowhere to be found.

17.24

Will you want to live in San Francisco – tomorrow?

41 Sutter Street, Suite 1579 . San Francisco CA 94104-4903 . (415) 566-7050

Recycled Paper





San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

Other preservation alternatives should be studied, including the one labeled "G" which was dropped from the document.

17.24
con't

In addition to looking at a project with a lower density, alternatives that eliminate the increased office space and all but neighborhood serving retail should be developed and analyzed for their impact on transportation.

17.25

The preferred alternative provides 8900 dwelling units and more than 11,000 parking spaces. In addition the number of streets in the development are *increased*. This runs counter to the City's Transit-First policy. Since the project proposes unbundling the parking from the residential units, there should be a *decreased* demand for spaces; moreover, the 290,000 square feet proposed for structure parking adds to bulk and density of the project, and should be minimized. An alternative should be studied that reduces parking to less than 1:1; at a minimum, a .75:1 ratio would be in keeping with city policies

17.26

Socio-Economic Addendum should be prepared and evaluated within the EIR document in order to compare affordability and identify institutional subsidies that may be required;

17.27

Greenhouse Gas Emissions. This analysis fails to take into consideration the stored energy of the existing units. Buildings that would be demolished would cause the loss also of the materials of which they are built and wastes the resources that are present in the buildings on the ground;

17.28

Wind and Shadow. We vehemently disagree that the impact of shadow on the site is Less than Significant, and are very disappointed in the minimal evaluation of this severe impact. The shadow assessment of internal open spaces is wholly inadequate, and also fails to take into account the increased use of these spaces by the increased residential population. The document summarily dismisses an assessment of open space by stating that the changes in the open space plan make comparisons impossible. For instance, the document determines that shadow impacts on the Meadow can't be assessed because it is smaller and surrounded by tall buildings – this seems to be an effort to avoid looking at the true impacts of the increased density of the project. This should be a very straightforward comparison; how much unshadowed open space will be available to residents at any given season with or without the project? It seems like a pretty basic math problem that should and must be included.

17.29

We are dismayed by the one analysis of internal open space that is included - the Commons, a major passive recreation space, will receive essentially zero sunlight during the winter months, and will be more than 50% shadowed at every season. How is this not significant?

Will you want to live in San Francisco – tomorrow?

41 Sutter Street, Suite 1579 . San Francisco CA 94104-4903 . (415) 566-7050

Recycled Paper





San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

Biological Resources. The removal of most of the 1500 trees on the site (including an unstated percentage of the 289 significant trees) cannot be mitigated in the term of this project. The tree canopy at Parkmerced is an essential resource in the area, which is a critical stopover on the Pacific flyway, and replacement of the tree cover will take decades. This is a *significant, unavoidable, impact.*

17.30

Placing wind turbines to the west of the site, where they are most likely to interfere with wildlife is questionable; neither location, east side or west has been studied for their feasibility. Therefore, energy production from this source cannot be included with surety. Their location should be viewed with the attendant visual impacts on what is presently an attractive gateway to the City.

17.31

Mitigation Measures

The well-publicized financial problems of the developer call into question their ability to perform the required mitigations.

17.32

Thank you for providing us with the opportunity to comment.

Sincerely,

Jennifer Clary
President

Will you want to live in San Francisco – tomorrow?

41 Sutter Street, Suite 1579 . San Francisco CA 94104-4903 . (415) 566-7050

Recycled Paper



RESPONSES TO LETTER 17

San Francisco Tomorrow, Jennifer Clary, President, July 12, 2010

Response 17.1

The comment suggests reorganizing the Draft EIR so that the project is analyzed using shorter time frames. Please see Response TR.26.1, in Section III.B, Public Hearing Comments and Responses.

Response 17.2

The comment states that the Draft EIR does not adequately address San Francisco's Priority Policies. Please refer to Response TR.34.1.

Response 17.3

The comment asserts that the wholesale demolition and reconstruction of Parkmerced would be a significant land use impact and would not be a successful approach to redeveloping Parkmerced.

The conclusion that the Proposed Project's land use impacts would be less than significant is based on the significance criteria listed in Section V.A, Land Use, pp. V.A.9-V.A.10. Although the Proposed Project would result in physical changes to the Project Site, the Proposed Project would not physically divide an established community or have a substantial adverse impact on the land use character of the vicinity (please refer to pp. V.A.10-V.A.13).

The comment regarding the Project Sponsor's approach to redeveloping Parkmerced (demolition and reconstruction as opposed to incremental infill over an extended period of time) does not address the adequacy or accuracy of the analysis presented in the EIR, but instead addresses the Proposed Project's design. The Project Sponsor's approach to redeveloping Parkmerced is an issue that may be considered by the decision-makers as part of their decision to approve or disapprove the project. As described in the EIR, the Proposed Project would not involve demolition and reconstruction of the entirety of Parkmerced, but would involve demolition and construction of portions of the Project Site conducted in phases at one time over a period of about 20 years.

Response 17.4

The comment states that tripling the number of units will significantly impact Parkmerced and the surrounding neighborhoods. As described in Section V.C, Population and Housing, pp. V.C.13-V.C.14, the Proposed Project would increase the existing on-site residential population from about 7,340 people currently, to about 20,290 people in 2030. The Project Site is in an area that

has been identified by ABAG as one of 10 urban areas in the City with the potential to accommodate substantial population growth; the Proposed Project would conform to ABAG's designation of the Parkmerced Site as a Priority Development Area. The 12,950-person increase in Parkmerced's residential population would substantially change the existing areawide population, but not beyond that which has been expected and incorporated into local and regional planning efforts. Portions of the Project Site are underdeveloped and have the potential to absorb substantially more residential population growth. The resulting residential densities on the Project Site would not exceed levels that are permitted, common, and accepted in urban areas such as San Francisco. The number of residential units would increase from one housing unit for every 1,570 square feet of land area to one for every 565 square feet of land area, similar to many residential and residential-mixed zoning districts in the City.

The Proposed Project includes the proposed *Parkmerced Design Standards and Guidelines*, which would establish design guidelines intended to enhance the neighborhood character of the area while accommodating the substantial growth in on-site population.

The Parkmerced Project would also provide all on-site infrastructure for connections to City mains and would include on-site treatment of stormwater runoff. On-site infrastructure improvements would not be built to accommodate additional excess capacity that might encourage additional local growth. The rerouting of the Muni light rail through the Project Site would also be unlikely to encourage unforeseen population growth. The on-site infrastructure needed to support the level of growth anticipated for the Proposed Project was based on projections that included the residential component of the Proposed Project, and is discussed in the cumulative analyses in Sections V.E, Traffic and Circulation, and V.K, Utilities and Services Systems. Therefore, the Proposed Project would increase residential population in an established urban area with a high level of local and regional transit access and would not expand or build new infrastructure that would lead to indirect population growth.

Response 17.5

The comment asserts that introducing retail and office uses to an area that is predominantly residential and recreational in nature would be a significant change in land use and would impact local retail districts.

Section V.A, Land Use, pp. V.A.9-V.A.10, lists the significance criteria used to evaluate the Proposed Project's land use impacts. Although the Proposed Project would result in physical changes to the Project Site, those changes would not physically divide an established community or have a substantial adverse effect on the character of the vicinity. Based on these significance criteria, the land use impacts of the Proposed Project would be less than significant.

The impact of the proposed retail and office uses on local retail districts is an economic issue that is not a physical environmental effect to the extent that any economic shifts do not lead to indirect environmental impacts. Please refer to Response 33.2.

Response 17.6

The comment states that the use of the term “Aesthetics” in the Draft EIR is a pejorative term. The Draft EIR conforms to the San Francisco Planning Department’s *Consultant Guidelines for the Preparation of Environmental Review Documents* and Appendix G of the *CEQA Guidelines*, including the language provided in the CEQA checklist. Therefore, the use of the word “Aesthetics” is appropriate in the EIR.

Response 17.7

The comment asserts that the EIR does not provide sufficient massing photosimulations from within the Project Site to enable a reader to adequately compare the massing of proposed new development with existing onsite buildings. As discussed in Section V.B, Aesthetics, pp. V.B.1-V.B.3, the existing Parkmerced residential complex is a visually distinctive, cohesive, and intact residential enclave. The proposed demolition of the existing garden apartment buildings and landscaping would eliminate a visual and scenic resource of the built environment and would result in a significant and unavoidable impact on a visual and scenic resource.

As discussed in Section V.B, Aesthetics, the Proposed Project would completely transform the existing visual character of the project site. With the exception of the existing residential towers, almost none of the preexisting visual context within the Project Site would remain if the Proposed Project is implemented. The EIR photosimulations taken from viewpoints within the Project Site (Figures V.B.2 and V.B.3, pp. V.B.8-V.B.9) show little or no existing visual context to remain on site (unlike the other photosimulations taken from offsite viewpoints that show the preexisting offsite visual context). As such, the on-site photo simulations are less useful for the purpose of comparing the massing of the Proposed Project against an existing urban context. Detailed renderings of proposed representative streetscapes within the Project Site (Figures V.B.12-V.B.15, pp. V.B.25-V.B.28) are presented in the EIR to illustrate the urban design intent for visual character within the Project Site, as detailed in the proposed *Parkmerced Design Standards and Guidelines*.

Response 17.8

The comment states that the Draft EIR Appendix contains promotional material. Please refer to Response TR.26.3 for a discussion of this issue.

Response 17.9

The comment states that the photosimulations included in the Draft EIR do not show open space. Photosimulations in the EIR are representative simulations of the massing scheme of proposed new construction. The representative massing simulations are simple diagrams illustrating the overall height and volume of proposed new construction, but they do not illustrate any specific designs of new buildings. Landscaping is also shown as representative, as it would be expected to appear five years after planting. However, detailed renderings of proposed representative streetscapes within the Project Site are presented in Figures VB.12- V.B.15 (EIR pp. V.B.25- V.B.28) to illustrate the urban design intent for open space and landscaping, as envisioned in the proposed *Parkmerced Design Standards and Guidelines*.

Response 17.10

The comment states that the Proposed Project would transform the site from one that is predominantly defined by its open space and greenscape to one that is defined by the built environment. As discussed in Section V.B, Aesthetics, under Impact AE-1 on p. V.B.21, the removal or relocation of close to 82 percent of the trees and the demolition of 170 two-story garden apartment buildings and associated landscaping would be necessary to implement the Proposed Project. These development activities would result in a significant and unavoidable impact on the Parkmerced visual and scenic resources of the built environment (Section V.B, Aesthetics, Impact AE-1, pp. V.B.20-V.B.21). Development of the Proposed Project would result in the loss of about 7 acres of open space, from approximately 75 acres to 68 acres, or a ten percent reduction in the amount of open space provided on the project site. In terms of the relationship between the built environment and publicly-accessible open space, the existing setting includes approximately 75 acres of open space and 77 acres of built environment including roads and other infrastructure of about half open space and half built. The proposed development program would result in approximately 68 acres of open space and 84 acres of built environment including roads and other infrastructure, or a ratio of built environment to landscape of 55/45. Although a transformation of the Project Site would result from the proposed increase in residential density, the architecture and infrastructure, including the publicly-accessible open space, private roof decks and balconies, and semi-private interior courtyards, are designed to serve the higher population. New landscaping and architecture would replace the existing visual/scenic resource; however, the proposed development program would not result in an imbalance where the built environment predominates at the expense of open space or greenspace. Please see Chapter III, Project Description, p. III.16, for additional detail regarding the Proposed Project's open space.

Response 17.11

The comment asserts that the removal of trees would affect the microclimate on the Project Site. The Parkmerced site does not support a microclimate that is unique or different from any other site in the western San Francisco area. Furthermore, as described in Chapter III, Project Description, p. III.23 and pp. III.63-III.65, tree removal activity would occur in phases over an approximately 20-year period. As such, only a portion of the site's existing trees would be removed during any given period. Lastly, this comment relates an opinion on the Proposed Project's impact to the local microclimate which does not address any CEQA significance criteria relating to biological resources or air quality.

Response 17.12

The comment states that the placement of wind turbines along Brotherhood Way and Lake Merced Boulevard should be considered a significant visual impact. As described in Section V.B, Aesthetics, pp. V.B.B.29-V.B.30, the Proposed Project includes 51 100-foot-tall wind turbines that would line the western perimeter of the Project Site along Lake Merced Boulevard. The proposed wind turbines lining the east side of Lake Merced Boulevard would be most prominent when looking south or north along Lake Merced Boulevard. However these views are not considered visual or scenic resources under CEQA's significance criteria. Views into Harding Park Golf Course and beyond, and from the golf course toward the Project Site are screened by a row of Monterey cypress that lines the west side of Lake Merced Boulevard. Further screening is provided by successive rows of trees that separate the fairways in the interior of the golf course. Views of Lake Merced from Lake Merced Boulevard are likewise screened by a cover of mature vegetation between the lake and Lake Merced Boulevard. As concluded in the EIR in Section V.B. Aesthetics, pp. V.B.25-V.B.26, although the proposed wind turbines would be a prominent new visual feature when viewed along Lake Merced Boulevard, they would not have a significant adverse impact on existing scenic resources, visual quality, or scenic vistas.

Response 17.13

The comment states that Parkmerced is a visual gateway into San Francisco from the south, and that Viewpoint D (Figure V.B.5: Viewpoint D – View Looking North Along Junipero Serra Boulevard at the Brotherhood Way Interchange, p. V.B.12) illustrates a wall of highrises greeting visitors as a result of the Proposed Project. In Viewpoint D, proposed new midrise buildings would replace views of the existing high rise towers that now mark the southeast corner of the Project Site for northbound travelers along Junipero Serra Boulevard. As explained on EIR p. V.B.20, the simulations are representative massing simulations presented to illustrate the overall height and volume of proposed new construction. They do not illustrate any specific designs for new buildings. Any design for new buildings would be required to conform to the proposed

Parkmerced Design Standards and Guidelines, which establishes guidelines intended to promote high quality design and materials in new construction.

Response 17.14

The comment asserts that the population and housing analysis in the Draft EIR is deficient in its assessment of impacts on the availability of affordable housing since the City currently lacks a valid Housing Element, and therefore lacks an assessment of the real needs or shortfalls of affordable housing. The estimate of San Francisco's share of affordable housing units needed in the Bay Area, as presented in Section V.C., Population and Housing, p.V.C.6, is taken from ABAG projections in *San Francisco Bay Area Housing Needs Plan 2007-2014*. Further, the challenge to San Francisco's Housing Element was not a challenge to the validity of the underlying data but rather a challenge to the level of environmental review needed to adopt the Housing Element. So to the extent data is cited from the Housing Element, it can be assumed to be accurate unless evidence to the contrary is presented.

Response 17.15

The comment states that the current pre-emption of family housing for use as student housing for SFSU is neither identified nor studied in the EIR. The comment implies that Parkmerced's popularity for providing housing for SFSU students is essentially forcing out families from the Project Site. As discussed in Section V.C, Population and Housing, on pp. V.C.13-V.C.14, the Proposed Project would increase the City's housing stock and would therefore contribute to the City's ability to meet the broader need for housing options of varying sizes, types, and levels of affordability. The proposed number of market rate (4,827) and below market rate (852) units would be expected to support the City's efforts to meet its regional housing needs allocation (31,193 units) and the total Bay Area housing need of 214,500 units projected by ABAG through 2014.¹ The Proposed Project would not prohibit students, or any demographic, from future leasing or purchasing options. Therefore, no additional discussion is needed in the EIR.

Response 17.16

The comment asserts the loss of over 1,500 rent controlled units is a significant, unmitigatable impact. Please refer to Responses TR.2.2, TR.20.2, and 15.4 for a discussion on the loss of rent controlled units.

¹ Housing Needs Plan, p. 43.

Response 17.17

The comment states the analysis of the alternatives is inadequate. Please see Master Response A.4, Alternatives, in Section III.A, Master Responses.

Response 17.18

The comment states that a study should be made of which trees might be retained even though none are landmark trees, because the loss of trees will take decades to replace. A detailed discussion of proposed tree removal activity is summarized in Chapter III, Project Description, p. III.23, and pp. III.63-III.65, and Section V. M, Biological Resources, pp. V.M.27-V.M.28. The existing trees on the site were inventoried and analyzed by qualified arborists familiar with the City's Urban Forestry Ordinance. The finding that the site contains no landmark trees is based on the legal definition of these trees in the ordinance. As stated in on p. III.23, the Proposed Project includes new landscaping throughout the Project Site; this new landscaping would include new trees, some of which may be faster growing than those to be removed. In addition, many existing trees on the site are proposed to be retained based on the arborists' recommendations.

Response 17.19

The comment states that the Proposed Project, along with cumulative projects, would impact travel to the Peninsula and SFO. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, for additional discussion of this issue.

Response 17.20

The comment states that the Draft EIR does not identify the Transit First priorities that restrict parking and increase transit. The Proposed Project contains a number of elements designed to reduce the number of single-occupant vehicles generated. The Proposed Project's physical design (including small, compact, pedestrian-oriented streets), relatively high density, and mix of uses are intended to maximize the number of non-automobile trips made within the site. For example, if the Proposed Project were constructed as entirely residential, all shopping trips would be made external to the site and would be more likely to use autos as a result. Further, the site includes a number of disincentives to auto travel and ownership, including unbundled parking for residential uses, no free parking for visitors, and realigning the M Ocean View to provide direct transit service to the Proposed Project's primary retail and office core. Finally, the Proposed Project's parking supply is consistent with the Planning Code, which requires one off-street parking space for each residential unit. See also Master Response A.2, Transportation and Circulation, Section

2.3, regarding the relationship of proposed parking to the City's Transit First policy, and see Response TR.34.2.

Response 17.21

The comment requests a discussion regarding the consistency of the proposed transportation improvements with the 19th Avenue/Park Presidio Transportation Plan, prepared by the SFCTA and SFMTA. Although the 19th Avenue/Park Presidio Neighborhood Transportation Plan did not develop detailed recommendations for each intersection along 19th Avenue, it did develop intersection prototypes, which describe features generally recommended at area intersections. Generally, the improvements proposed by the project are consistent with the SFCTA study in that they include shortened curb radii, mid-intersection pedestrian refuge "thumbnails," advanced limit lines, new signals, and ADA upgrades.

The comment also states that rerouting the M Ocean View line through the Project Site would cause slowdowns to vehicular traffic. The comment raises an alternative for grade separation on 19th Avenue. See Response TR.31.2 for discussion of grade separation of the M Ocean View on 19th Avenue and Master Response A.2, Transportation and Circulation, Section 3.1, for more discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

Response 17.22

The comment states that shuttles to serve the Parkmerced residents should be studied. Shuttles are proposed as part of the Proposed Project. See Chapter III, Project Description, p. III.37, and Section V.E, Transportation and Circulation, p. V.E.34, which describe the Proposed Project's Transportation Demand Management (TDM) program, including new shuttles.

Response 17.23

The comment states that impacts of rerouting the M Ocean View light rail line, specifically impacts to vehicle traffic associated with additional rail crossings of 19th Avenue, are not adequately evaluated. The traffic impacts associated with the proposed configuration of the M Ocean View light rail line, as well as the proposal to construct a fourth southbound auto travel lane on 19th Avenue at Holloway Avenue, are described in the EIR on pp. V.E.53-V.E.69. Specifically, Tables V.E.11-V.E.13, on pp. V.E.55-V.E.61, describe intersection levels of service for all study intersections, including those where the M Ocean View would cross portions of 19th Avenue, for Existing, Existing plus Project, and 2030 Cumulative Conditions. The provision of a fourth southbound travel lane on 19th Avenue more than compensates for the additional delay imparted by the new light rail crossing, such that conditions with the Proposed Project (including

the new rail crossing and the fourth southbound lane) are projected to experience lower average vehicular delay than existing conditions.

This comment also suggests that the EIR should consider the potential benefits and/or impacts associated with realigning the M Ocean View to the west side of 19th Avenue along its entire route. See Response TR.35.1 for discussion of aligning the M Ocean View on the west side of 19th Avenue and Master Response A.2, Transportation and Circulation, Section 3.1, for more discussion of the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

Response 17.24

The comment states the analysis of the alternatives is inadequate. See Master Response A.4, Alternatives.

Response 17.25

The comment requests analysis of additional alternatives in the Draft EIR. See Master Response A.4, Alternatives.

Response 17.26

The comment requests analysis of additional alternatives in the Draft EIR. See Master Response A.4, Alternatives.

Response 17.27

The comment states that a socio-economic addendum should be prepared to compare affordability and identify institutional subsidies that may be required. CEQA (*CEQA Guidelines* §15134) states that economic or social effects of a project shall not be treated as significant effects on the environment, thus this type of analysis is not required by CEQA.

Response 17.28

The comment introduces a term “stored energy” to reflect the work that went into building and maintaining the buildings that would be demolished under the Proposed Project. Since the Parkmerced rental complex was constructed between 1941 and 1951 the energy that was used long ago as part of the original construction of the existing buildings provides a service or, in other words, shelter and/or employment for the existing population. Energy used to build and maintain the existing buildings and the functions that these buildings serve are baseline conditions. Greenhouse gas emissions associated with this “stored energy” occurred primarily

over 50 years ago at the beginning of the service life of the existing buildings. The comment asserts that the work that went into building and maintaining the buildings would be lost as a result of the Proposed Project. As stated in Table V.H.3: City Regulations Applicable to the Proposed Project, in Section V.H, Greenhouse Gas Emissions, p. V.H.19, as a requirement of the San Francisco Green Building Requirements, at least 75 percent of the project's construction and demolition debris is required to be recycled. The Proposed Project would also be required to use construction techniques intended to reduce carbon emissions and minimize the waste of materials. In addition, energy and greenhouse gas emissions embodied in waste material and generated by demolition and construction activities for the Proposed Project would be partly or wholly offset by the more energy-efficient operation of the new structures and by the reduced per capita transportation energy consumption that can result from increased residential density. As listed in Table V.H.3, pp.V.H.18-V.H.19, there are several City regulations applicable to the Proposed Project that would serve to reduce energy consumption and water use, increase recycling, and encourage transit use, among other things.

Response 17.29

The comment states that the shadow analysis of the proposed on-site open spaces, particularly for the Meadow, is inadequate. Section V.I, Wind and Shadow, pp. V.I.54-V.I.59, provides a qualitative analysis of the Proposed Project's shadow impacts on all of the proposed on-site open spaces except for the Meadow. The existing Meadow would be reduced in size by approximately one-third to one-half of its current area. During the spring and autumn, the Proposed Project would shadow portions (50 to 75 percent) of the proposed Meadow, but different areas of the proposed Meadow would receive a total of approximately six hours of sunlight each day. During the winter, the Proposed Project would shadow portions (75 to 100 percent) of the proposed Meadow, but different areas of the proposed Meadow would receive a total of three to four hours of sunlight each day. During the summer, the Proposed Project would shadow almost all of the proposed Meadow at the beginning and the end of the day. From approximately 9:00 AM until approximately 4:00 PM, almost all of the proposed Meadow would be sunny. Compared to the existing Meadow, the proposed Meadow would have larger shadows for longer periods of time. Considering the amount of sunlight that would reach the proposed Meadow throughout the year, the shadows from the Proposed Project would not substantially affect the use of the proposed Meadow for active or passive recreation, nor would they be harmful to the growth or health of landscaping and vegetation. The proposed landscaping would be selected to be suitable for the amount of shadow created by the Proposed Project. The proposed Meadow would not be subject to Section 295 of the Planning Code, so the shadows from the Proposed Project would not adversely affect the use of any park or open space under the jurisdiction of the Recreation and Park Commission. For these reasons, the shadow impacts of the Proposed Project on the proposed Meadow would be less than significant, and no mitigation measures are required.

Because the Commons would be shadowed during the winter months, the comment disagrees with the conclusion that the Proposed Project's shadow impact on the Commons would be less than significant. As discussed in Section V.I, Wind and Shadow, pp. V.I.54-V.I.55, the Commons would not be completely shadowed for the entire day during the winter. On the winter solstice, Project-related morning shadows would cover approximately two-thirds of the Commons before receding as the day progresses, and Project-related evening shadows would cover approximately half of the Commons at the end of the day. As shown on Figures V.I.32 through V.I.36, the Commons would receive approximately seven hours of sunlight on the winter solstice (from approximately 9:00AM until approximately 4:00PM).

Response 17.30

The comment expresses concerns over planned removal of trees on the Project Site and impacts on migratory birds as a result of implementation of the Project Site. Please refer to Response TR.17.2.

Response 17.31

The comment states that the proposed wind turbines would interfere with wildlife and would result in visual impacts. Please refer to Response 45.11 for a discussion of the impacts of the proposed wind turbines on wildlife and to Response 17.12 for a discussion of the visual impacts of the proposed wind turbines.

Response 17.32

The comment raises concerns over the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures, citing recent financial media coverage of the Project Sponsor. Please see Response TR.1.2.

C.3 INDIVIDUALS

Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission St., Ste. 400
San Francisco, CA 94103

RECEIVED

May 14, 2010

MAY 19 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Dear Mr. Wycko,

My name is Marty Walker. I am in receipt of the Environmental Impact Report for Case #2008.0021E, the Parkmerced project. As a resident of Parkmerced since 1988 I am an interested party, and I appreciate your soliciting my input.

I have attended numerous planning meetings by the property owners, and I am frankly appalled by their proposal to destroy a beautiful and historic city landmark. In 2008 the Chronicle wrote:

"Its courtyards, medians, circles and other open spaces were designed by Thomas Church (1902-1978), the San Francisco landscape architect whom the National Trust for Historic Preservation called the "creator of the modern garden." The overall Parkmerced plan - the radiating streets, the almost Beaux Arts-style symmetry - was designed not by Church but by the venerable Leonard Schultze (1877-1951), one of New York's great architects."

Parkmerced is a unique semi-urban oasis in the city of San Francisco. It's beautifully conceived and thoughtfully designed, quiet, park-like and a lovely place to live. It's the safest place in San Francisco for children and elderly residents. The streets are pleasingly curved and there is little traffic. The units are aging and badly in need of rehabilitation. But that is a far better option than the all-out destruction proposed by Stellar Management.

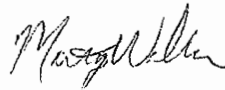
18.1

The addition of 13,000 or more new residents will destroy the peace of the present community. Raising the rooflines would remove the open space. The proposed architecture is ugly, utilitarian, unimaginative and distinctly un-San Franciscan. It looks exactly like what it is: warehousing for human beings.

The proposed M-car stops would bring hundreds of students and other non-residents into the community from morning to night, which would effectively destroy the community itself. It will split the property, isolating the residents who live to the east of the tracks. Additionally, it will cause major inconvenience to our neighbors to the east of 19th Avenue.

The proposed project looks very slick, with all of its "green" bells and whistles. Maybe it should be built somewhere. But not here. There is already a community here. Don't be deceived: the only kind of green Stellar Management is really interested in is the kind they can spend. Please don't sacrifice Parkmerced on the altar of avarice.

Thank you,



Marty Walker
100 Cambon Drive
San Francisco, CA 94102

RESPONSES TO LETTER 18

Marty Walker, May 14, 2010

Response 18.1

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Janet Karesh
582 Arballo Drive
San Francisco, CA 94132-2163

RECEIVED

JUN 04 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

May 27, 2009

Bill Wycko
Environmental Review Officer
San Francisco Planning Dept.
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Mr. Wycko:

Since I have resided in Parkmerced for 49 years, I feel that I have a right to address my concerns about the increased population density proposed in Parkmerced's 30-year project to the Department. The plan proposes to increase Parkmerced by 5,679 new apartments, doubling its current population. San Francisco State University's campus bordering Parkmerced on the north with its present 32,000 students already adds substantially to the area's population density. I understand that the University expects its student population to continue to grow. Parkmerced's 116 acres and the University campus seem much too small to absorb the proposed numbers even in high-rise structures.

19.1

Despite the Plan's traffic alleviation proposals, more people means more cars in the area. Nineteenth Avenue and Lake Merced Boulevard which border on the east and west side of Parkmerced are already badly congested. Much of the time they have bumper to bumper traffic.

19.2

Parkmerced maintains that its large patio homes are obsolete. They are only obsolete to a management that wants to make money by packing more and more people into high rise structures.

I hope that the Department will take these concerns into consideration during its deliberations on the acceptability of the Plan.

Sincerely,

Janet Karesh

Janet Karesh

P.S. Since the Parkmerced organization is in default, I would not expect the Planning Commission to issue any permits until they are solvent. J.K.

19.3

RESPONSES TO LETTER 19

Janet Karesh, May 27, 2010

Response 19.1

The comment expresses concerns about the increase in population density, and states that the Project Site is too small to accommodate the increases in population from the Proposed Project and other nearby projects such as through the implementation of the SFSU Master Plan.

As described in the EIR in Section V.C, Population and Housing, pp. V.C.14-V.C.18, cumulatively, buildout of the Parkmerced Project along with other anticipated residential and mixed-use developments in nearby areas along the 19th Avenue Corridor (i.e., the mixed-use projects at 77–111 Cambon Drive and at 1150 Ocean Avenue [in the Balboa Park Station Area Plan]; residential developments at 800 Brotherhood Way, at 445 Wawona Street [Ardenwood], and at 700 Font Boulevard; and the *San Francisco State University Master Plan*) is estimated to increase the City's population by about 16,850 persons by 2030. The projected growth from these projects is expected to be about 13.2 percent of the anticipated Citywide population growth in 2030 and would fall within the Association of Bay Area Governments' population projections for the City. It is possible that cumulative projects could result in localized changes in zoning or land uses that could result in substantial direct or indirect population growth that would exceed City population projections. However, the development projects considered in this cumulative analysis extend beyond those formally proposed and under review by the City and encompass most sites in the southwest quadrant of the City with the potential to accommodate substantial additional development. Also, the City is largely built out, thus there are few opportunities for unplanned changes in zoning or land use that would cause substantial growth. Furthermore, the City actively engages in long-range planning efforts that consider infrastructure, public services, and housing needs in the context of expected population growth. Consequently, there is no anticipated significant cumulative impact associated with population and housing growth.

The Proposed Project would directly increase the on-site population in an established urban area with high levels of local and inter-regional transit services and facilities and would provide other neighborhood amenities and services intended to accommodate this increase. This population growth is therefore considered planned growth. Indirect growth (or unplanned growth) is residential and employment growth that would result from an expansion of local infrastructure and public services. The Proposed Project would improve the on-site infrastructure but would not build or expand infrastructure or public services that would encourage indirect growth. Areas surrounding the Parkmerced neighborhood are largely built out, with a limited number of potential development plans seeking to increase the intensity of land uses on undeveloped or underdeveloped sites.

Responses to Letter 19. Department of Transportation

The Proposed Project's population growth would be considered substantial if it were not anticipated in local planning efforts. As described on pp. V.C.14-V.C.15, this anticipated population growth has been accounted for in the Association of Bay Area Governments' population projections for the City, and therefore would not be considered substantial. Thus, the Parkmerced Project would not make a cumulatively considerable contribution to any potential cumulative impact related to increases in population, and its cumulative impact would be less than significant.

Please see Response 17.4 for a discussion of increased population density on the Project Site.

Response 19.2

The comment states that the Proposed Project will increase traffic congestion. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for additional discussion of this issue.

Response 19.3

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures. Please see Response TR.1.2, in Section III.B, Public Hearing Comments and Responses, for a discussion of this issue.

RECEIVED

JUN 01 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

May 28, 2010

Environmental Review Officer
San Francisco Planning Department
1650 Mission Street Suite 400
San Francisco Ca 94103

Atten: Mr. Bill Wycko

Re. Case No. 2008.0021E-Parkmerced Project

The proposed project has many fine features which would enhance the property.

There are two exceptions that I believe you should carefully consider;

1--The gigantic increase in units from 3,221 to 8,900, will paralyze the area with parking, and traffic congestion that presently overloads

- a. 19th Ave.,
- b. Brotherhood Way
- c. Lake Merced Blvd.

20.1

2--The potential increase in population density of this project plus the expansion of San Francisco State University's present and future growth plans will make the area a nightmare for public safety and quality of life issues.

20.2

These issues are too important and should lead you to require a large reduction of the number of proposed units. This action will be greatly appreciated by the present tenants and the surrounding neighborhood.

Sincerely



L. P. De Martini
441 Gonzalez Drive
San Francisco California 94132

RESPONSES TO LETTER 20

L. P. De Martini, May 28, 2010

Response 20.1

The comment asserts that the Proposed Project would worsen already-overloaded traffic conditions. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for additional discussion of this issue.

Response 20.2

The comment expresses concerns about the increase in population density and resulting impacts to public safety and quality of life as a result of the Proposed Project along with cumulative projects such as the SFSU Master Plan proposal. Please see Responses 17.4 and 19.1 for a discussion of increased population density on the Project Site.

Police and fire protection are discussed in the EIR in Section V.L, Public Services. As stated on p. V.L.10, demand for police protection services in the Taraval Police District (the district in which Parkmerced is located) is expected to increase as the residences and commercial space in the Proposed Project and other reasonably foreseeable development projects, including the SFSU Master Plan, are built and occupied. This expected increase would not exceed the projected population increase anticipated by 2025 for southwest San Francisco in the *San Francisco Police Department District Station Boundaries Analysis Report*. Although cumulative development may result in a demand for additional San Francisco Police Department staff, that alone would not result in a significant physical environmental effect. As mentioned in Impact PS-1, on p. V.L.7, the Proposed Project includes space for a substation within one of the new buildings that would be constructed in the neighborhood core. Therefore, impacts on police services would not be significant.

Cumulative demand for fire protection and emergency medical service is also expected to increase as the residences and commercial space in the Proposed Project and other reasonably foreseeable development projects are built and occupied. As stated on pp. V.L.16-V.L.17, although cumulative development may result in a demand for additional San Francisco Fire Department staff or increased response times, that alone would not result in a significant physical environmental effect. As stated on pp. V.L.15-V.L.16, the Proposed Project would include an approximately 1,000-gross-square-foot substation near the transit plaza, with a potential to construct a new Fire Station in the southern portion of the Project Site. Therefore, impacts on fire protection and emergency medical services would not be significant.

III. Comments and Responses
C. Written Comments and Responses
C.3 Individuals

Responses to Letter 20. Department of Transportation

Concerns raised regarding effects on the quality of life express an opinion on the Proposed Project, but do not address any CEQA significance criteria relating to physical environmental impacts. This comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

50 Chumasero Drive,
Apt. 7E
San Francisco, CA 94132-2309

RECEIVED

JUN 04 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

June 3, 2010

Bill Wycko
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

Dear Mr. Wycko:

I am a resident of Parkmerced, residing at 50 Chumasero Drive, one of the tower buildings. For fourteen years my husband and I have lived here, while ownership of Parkmerced has changed two or three times. During these fourteen years parts of the property have been sold to San Francisco State University and many of these parcels have been rented to college students. From what I've observed, more college students are renting at Parkmerced than families even though the present owner and management companies have tried adding attractive touches to the environment, e.g. an exercise room and a computer room in each tower and very accessible front entrances, plus the use of computers and an exercise room in the main office building for residents living in the garden apartments.

In the booklet, *Marvels of Modernism* published by the Cultural Landscape Foundation, 1909 Q Street NW, Washington DC 20009, Parkmerced is included as one of the 'culturally significant landscapes' at risk for alteration or destruction. I can't believe that constructing more buildings, after demolishing the garden apartments, would be a good thing. I would like to see the Parkmerced neighborhood remain as it looks today, a uniquely laid out 'city within a city'.

21.1

As for the M-line coming through Parkmerced, I don't see any benefit to the residents here. The benefit might be to the pickpockets and other petty criminals who could easily get on from their usual stations downtown and just fall asleep, then wake up in Parkmerced, where they have no business. I think a much better transportation idea would be to put one or two more electric buses on the 17 bus route, not tear up the streets to put in unnecessary tracks. I would not like to see mass sight-seeing on an M-line that runs through my neighborhood.

21.2

21.3

Yours truly,

Dorothy Lefkovits

RESPONSES TO LETTER 21

Dorothy Lefkovits, June 3, 2110

Response 21.1

The comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 21.2

The comment states that there would be no benefit to residents from moving the M Ocean View light rail line through the Project Site, and that crime could increase as a result of the proposed realignment. The relocation does provide benefits to residents of Parkmerced by improving access to transit and removing the need to cross 19th Avenue to reach the transit platform. Transit riders to and from the Proposed Project would not have to cross any major streets to reach a transit platform, which would be located within the Project Site. In addition, students from SFSU would cross the much narrower and lower-volume Holloway Avenue to reach the transit platform instead of crossing 19th Avenue. These benefits are discussed as part of Impact TR-30 on pp. V.E.98-V.E.101 of the EIR. Further, the realignment would reduce overcrowding for the existing SFSU stop as described in the EIR in Chapter III, Project Description, p. III.30. There is no evidence to suggest relocating the M Ocean View into the Parkmerced site from its current alignment along 19th Avenue would increase crime in the Parkmerced area.

Response 21.3

The comment states that more buses should be added to the 17 Parkmerced bus route rather than extending the M Ocean View light rail line to the Project Site. Route 17 Parkmerced is a relatively minor route that operates at peak frequencies of between 20 and 30 minutes. Ridership on this route is extremely low and does not warrant increased service. Further, increased service on the 17 Parkmerced was not identified in the EIR as required mitigation for any significant project-related impacts.

Aaron Goodman
25 Lisbon St.
SF, CA 94112
E: amgodman@yahoo.com

San Francisco Planning Commission
c/o Linda Avery Commission Secretary
1650 Mission St. Suite 400
SF, CA 94103-2414

RE: Parkmerced 2008.0021E – DEIR/CEQA ISSUES

SF Planning Commissioners;

The SF Historic Preservation Commission hearing on June 2nd, 2010 brought to light a number of very important issues that to date have not been identified or highlighted by the SF Planning Dept. in regards to the DEIR and CEQA document and analysis on Parkmerced’s proposal.

- a) The “social-housing” aspect of Parkmerced, its original intent when built by Met-Life, and the city of SF, to assist families who could not buy property in SF. 22.1
- b) The lack of a proper full “Historic District” survey of Parkmerced’s cultural landscape and original boundaries (pre-sale to SFSU-CSU and other entities) and CEQA mandated analysis of the impacts and options that do not demolish the cultural landscape elements that form the entire parkmerced district. (ex: the rejected “infill” option under “G-a”). 22.2
- c) The current “default” status of Parkmerced, (post May 6th hearing at SF planning commission) Financial Feasibility of project, and proposal, and “iron-clad” agreements between the City of SF with Parkmerced Investors LLP (Stellar Management). 22.3
- d) Palmer vs. 6th decision in regards to the loss of sound rental housing and the SF General Plan. 22.4
- e) City of Marina vs. CSU decision in regards to the loss of over 1,000 units of rental housing, open space, traffic and transit impacts un-addressed to date by the City of SF in regards to the SFSU-CSU Masterplan and JOINT impacts on Parkmerced. 22.4
- f) Minimal attendance by Parkmerced residents at SFHPC hearing (lack of notice on the hearing, time of hearing (working hours), and repeated attendance of project sponsors proponents [attorney’s, lobbyists, “co-opted”- tenants] vs. the actual long-term disabled, senior, student, working-class residents who work daily, are most affected by the proposed development, and cannot take time off, or are on vacation (students) to attend such hearings.) 22.5

I would also thus highlight the following section where the letters and memo’s submitted have been “summarized” by members of the SF Planning Dept. (which of course brings to question why the memo’s were not included in the documents as part of the DEIR for

22.6

members of the public to review?) The items noted below are taken directly from the section 4.0 Scoping Comments Summary section, and should directly be addressed by the SF Planning Commission during the June 17th discussion on Parkmerced.

22.6
con't

Thank you for looking these submitted public comments above and below over very carefully, as it is technically and legally the concerns that need your proper vetting as agents of the general public, and certified local public government agency.

Sincerely

Aaron Goodman

FROM DEIR PARKMERCED – 2008.0021E (MY COMMENTS ARE IN BOLD UPPER-CASE TEXT), ADDITIONAL ISSUES HIGHLIGHTED BELOW ON THE ADEQUACY OF THE DEIR ANALYSIS.

4.0 SCOPING COMMENTS SUMMARY

The following is a summary of oral and written comments, arranged by topic:

Traffic/Transportation

- EIR should include detailed rail safety analysis, *****including considerations of grade separation or tunneling*, (NO OPTION WAS NOTED THAT PROVIDES FOR DIRECT TUNNELING ALONG 19TH AVE) median-running track, track alignments to reduce potential vehicle and pedestrian conflicts, adequate line of sights, adequate pedestrian safety, queuing times, traffic signal configuration, and lane configuration and width.
- Mitigation measures need to be included to address all rail safety-related impacts.
- EIR should consider parking issues and gridlock related to SFSU students parking on Parkmerced streets.
- EIR should evaluate the impacts of over *11,000 cars proposed to be parked on the site*.
- *A needs assessment should be conducted and included in the EIR to assess future projected MUNI ridership.*
- EIR should examine alternative locations for re-routing MUNI, including out of the 19th
- EIR should identify an updated maintenance agreement for 19th Avenue median, and including providing direct connection to BART. (NO OPTION SHOWS DIRECT LINKAGE AS AN IMMEDIATE GAIN/OPTION)
- EIR should identify performance measures and/or mitigation measures to improve pedestrian and bicycle access to transit facilities.
Avenue.
- The Traffic Impact Study in the EIR should include analysis of the impacts on State highway facilities. (1952 INTERCHANGE @ BROTHERHOOD WAY)

Historic Preservation

- ****EIR should identify the original Parkmerced boundary and discuss impacts of the selling

off (division) throughout the years. (SFSU-CSU IMPACT ON PARKMERCED PROGRAMMATIC EIR IGNORED HISTORIC PARKMERCED BOUNDARIES, AND SO DOES THE DEIR ON PARKMERCED BY PAGE AND TURNBULL)

- EIR should identify how “poor” landscape maintenance and ad-hoc landscape work throughout the years (and still on-going) has damaged the originally designed landscaping on site.
- ****EIR should include a district-level evaluation of project impacts and should accurately detail the project’s impacts on the key features of the identified cultural landscape on the site. (THIS SHOULD INCLUDE OPTIONS THAT HAVE THE LEAST IMPACT ON PARKMERCED’S CULTURAL LANDSCAPE ie; “INFILL-OPTION”)
- ****A feasibility analysis in the EIR should take into account regulatory and tax incentives available under the California Historical Building Code, Mills Act, and Federal Rehabilitation Tax Credit Program.
- ****EIR should discuss whether the Army Corps must comply with Section 106 of the National Historic Preservation Act (NHPA) before issuing a permit.(TO DATE NOT ADDRESSED BY THE DEIR DOCUMENT)

Land Use/Visual/Massing

- EIR should address the overall “departure” from the site’s unique character.(SEE SF GENERAL PLAN, DISTINGUISHING URBAN PATTERNS)
- EIR should analyze the size of the project site in relation to the planned population increase and determine if there is “adequate” space for all the residents. (NO ANALYSIS ON SQUARE FOOTAGE OF OPEN SPACE PER RESIDENT IN TYPICAL SF NEIGHBORHOODS VS. PARKMERCED CURRENTLY)
- EIR should identify that the new MUNI wires will be overhead even though all other utilities on the site are underground.
- EIR should discuss that re-routing of MUNI will impact existing peaceful character.
- View corridors should be identified and view (skyline) impacts of new towers identified.
- EIR should identify that the removal of Juan Bautista Circle for stormwater retention (the heart of Parkmerced) would damage the character of Parkmerced. (NOT ADDRESSED IN DEIR)
- EIR should discuss the scale of this project in relation to other San Francisco neighborhoods (numbers of units and residents per acre compared to other parts of the City). (SEE COMMENT ON ADEQUATE SPACE FOR ALL RESIDENTS ABOVE)

Biological Resources

- EIR should identify avian corridors and address potential for bird strikes from wind turbines and high-rise buildings.
- A tree survey should be done, and identify include any heritage trees (or trees that could be eligible as a heritage tree). (ROBERT ROSANIA REPRESENTATIVE OF STELLAR AND THE OWNERS, NOTED ON HIS SPONSORED TREE SURVEY THAT THERE WERE NO SIGNIFICANT TREES, THIS IS NOT TRUE AND AN INDEPENDENT ANALYSIS SHOULD BE CONDUCTED ON THIS ISSUE)
- EIR should identify impacts on nesting birds as a result of the tree removal planned on the site.
- EIR should discuss a tree replacement plan.

Sustainability

- EIR should quantify the carbon footprint from all construction activity planned (including planned tree removal activities).
- EIR should identify safety of wind turbines (on people and animals).
- EIR should clarify the definition of green space. **(ie: HARD-SCAPE/SOFT-SCAPE, WALKWAYS, PATHS, DESIGNED COURTYARDS, SHARED COMMUNITY SPACE, THERE WERE NOTABLE ERRORS IN THE OPEN SPACE DIAGRAMS OF PAGE AND TURNBULL AND SOM IN THE DEIR WHICH IGNORED INTERNAL COURTYARDS AND WALKWAYS, SHARED PATHS AND LOST OPEN SPACE PRIOR)**
- EIR should mention preservation, renovation, rehabilitation, restoration as sustainable methods of increasing the neighborhood sustainability. **(NO ANALYSIS ON ENERGY SAVINGS THROUGH USE OF THE MILLS-ACT vs. DEMOLITION)**
- EIR should address the useful lifespan of the existing buildings. **(NO “SOUNDNESS REPORT OR INFORMATION PROVIDED ON THE “DETERIORATION” NOTED TO DATE)**
- EIR should measure the impacts of “wholesale” demolition on sustainability goals. **(NO REVIEW OF THE TOTAL IMPACTS, GROSS WASTE, ENERGY USE ANALYSIS OF DEMOLITION OF TOWERS VS GARDEN UNITS AND OPEN/LANDSCAPE)**

Open Space

- EIR should identify the overall cumulative effects on open space – density proposed should be calculated for the Parkmerced community based on its original outline, not current boundaries. **(SEE NOTE PRIOR)**
- EIR needs to identify how the open space is being calculated (what is being included?). **(SEE NOTE PRIOR ON ERRORS RELATED TO HARD-SCAPE/SOFT-SCAPE AREAS NOT CALCULATED)**
- EIR should address how the loss of open space will affect the neighboring uses (SFSU, 800 Brotherhood, etc.). **(THIS ASKED TO ADDRESS THE LOSS OF ACREAGE OF PARKMERCED BY THE SALES OF LAND TO SFSU AND OWNER OF 800 BROTHERHOOD WAY, NOT THE IMPACT ON THEIR “USE”)**

Water

- EIR should identify current water wastefulness. **(NO INFO PROVIDED ON SHARED DORMITORY-LIKE USE OF PARKMERCED UNITS BY SFSU STUDENTS [OFTEN 8-10 PEOPLE IN A 2-BEDROOM, ACTUAL OCCUPANCY ANALYSIS OF THE PARKMERCED UNITS NO INFORMATION PROVIDED BY OWNER], UPS BLOCKS, AND METHODS TO REDUCE WATER WASTE AT GREEN MEDIANS WITHOUT THERE REMOVAL)**
- A regional “water use report” should be included in the EIR that addresses the surrounding development.
- Any groundwater use will need review and authorization by the SFPUC.

Wind

- EIR should include wind tunnel analysis and identify wind impacts to avian corridors.

Population/Jobs/Housing

- EIR should identify population density and potential for over-crowding, including increased wear-and-tear on open space, public resources and infrastructure, traffic, pollution, litter, traffic and congestion.
- EIR should identify the number of units (and bedrooms). **(NO INFORMATION PROVIDED BY OWNER ON THE QUANTITIES AND SIZE OF FUTURE UNITS VS CURRENT SIZE OF UNITS)**
- Density impacts should be evaluated per the original 191.5-acre Parkmerced boundary.
- EIR should address the loss of rental homes and where people are supposed to go once they are displaced. **(SOCIAL HOUSING, LACK OF AFFORDABLE RENTAL HOUSING CITYWIDE)**
- EIR should assume implementation of the SFSU Master Plan, which involves purchasing over 1,000 units of rent-controlled housing. **(CITY OF MARINA VS CSU IN THE LOSS OF OVER 1,000 UNITS OF RENT-CONTROLLED HOUSING WITH ZERO 'FAIR-SHARE' IMPACT FEES ASSESSED VS SFSU-CSU)**
- EIR should identify the proposed target demographic for both proposed rental and forsale units. **(WHO ARE THESE UNITS BEING BUILT FOR? THE ORIGINAL INTENT OF PARKMERCED, RAISED AS A SIGNIFICANT ISSUE BY COMMISSIONER ALAN MARTINEZ DURING THE SF HISTORIC PRESERVATION COMMISSION HEARING JUNE 2ND ON PARKMERCED)**
- EIR should include a cost-benefit analysis for both housing and commercial/retail uses planned. **(NO IMPACT ANALYSIS ON STONESTOWN, OCEAN AVE, WEST PORTAL BUSINESS AREA CORES)**
- EIR needs to address rent control laws in place that protect the existing residents. **(PALMER VS 6TH DECISION IN REGARDS TO NEWLY BUILT UNITS AND LOSS OF RENT CONTROLLED UNITS)**
- EIR should identify impacts to existing retail and commercial services as a result of construction of new retail and commercial services. **(SEE ABOVE)**

Stormwater

- EIR should identify storm water diversion designs and should address maintenance of planned bio-swales. **(THE LAKE MERCED BIO-SWALES SHOULD BE REVIEWED AS AN EXAMPLE OF POORLY MAINTAINED BIO-SWALES, AND THE COSTS OF MAINTAINING THEM BY THE CITY, DUE TO FINANCIAL ISSUES OF PARKMERCED'S OWNERSHIP)**

Noise

- Streetcar noise should be analyzed in the EIR.

Air Quality/Hazards

- EIR should address the health impacts of demolishing the existing buildings. **(NO ANALYSIS DONE ON THE AIR-CONTAMINENTS OF A TOTAL DEMOLITION OF THE ENTIRE PROJECT)**

Geology

- EIR should identify existing seismic upgrades that have been made to the property. (NO INFORMATION PROVIDED ON THE SOUNDNESS OF THE TOWERS)
- EIR should provide information about locations of earthquake faults near the site. (NO INFORMATION ENCLOSED ON THE CONCERNS FOR SEISMIC INSTABILITY OF THE TOWERS BASED ON GROUND ANALYSIS)
- EIR should address proposed seismic upgrades and whether these upgraded and new buildings would stand up to a large earthquake. (NO ALTERNATIVES OR OPTIONS INCLUDED TO PROTECT AND PRESERVE THE EXISTING HOUSING STOCK)

Cumulative

- EIR needs to address cumulative impacts (to the surrounding areas, SF as a whole, and regionally) as a result of expansion identified in the SFSU Master Plan. (NO INFORMATION PROVIDED ON THE LOSS OF HOUSING UNITS TOTAL IN THIS DISTRICT)
- EIR should mention the cumulative development impacts from other nearby sites: 800 Brotherhood, 77 Cambon, 700 Font (SFUSD site). (IMPACTS ON PARKMERCED'S ORIGINAL BOUNDARIES AND HISTORIC DISTRICT IN THE CEQA HISTORICAL DISTRICT ANALYSIS, WHICH WAS NOTED BY COMMISSIONER CHARLES CHASE AT THE JUNE 2ND HISTORIC PRESERVATION MEETING WHEN ADDRESSING THE PAGE AND TURNBULL REPRESENTATIVE ON THE USE OF 'HISTORIC DISTRICT' IN THE ANALYSIS WHEN IT WAS OBVIOUS THAT THE IGNORING OF OTHER SITES WAS THE METHOD TO "DIVIDE AND CONQUER" PARKMERCED'S PROPER ANALYSIS PER CEQA.)

Alternatives

- A preservation alternative should be considered that follows the Secretary of Interior Standards. (NONE PROPOSED/SUGGESTED AS ADEQUATE/ALTERNATIVES THAT PRESERVE AND PROTECT THE CULTURAL LANDSCAPE OF PARKMERCED)
- EIR should include a reduced scale alternative that would maintain Parkmerced's eligibility for the National Register.
- The standards-compliant alternative should analyze whether and where some infill construction and selective demolition and new construction could be appropriate within the identified cultural landscape. (THIS OPTION WAS REJECTED BY THE SF PLANNING DEPT. DUE TO THE PROJECT SPONSORS GOALS, THIS OPTION SHOULD BE INCLUDED REGARDLESS AS AN ADEQUATE AND SOLID PRESERVATION ALTERNATIVE 'INFILL-OPTION "G-a" WITH OTHER ALTERNATIVES AND OPTIONS TO MEET THE GOALS OF THE PROJECT)
- Other locations for re-urbanization and construction should be identified. (EQUITY DENSITY DEVELOPMENT ON SFSU, STONESTOWN, AND INFILL SITES ON WEST PORTAL/OCEAN AVE. AND THE USE OF SOLD OFF SITES, OR ABOVE TUNNELING WORK AIR-DEVELOPMENT RIGHTS FOR DENSITY ACCRUAL NOT INVETSIGATED)

Miscellaneous

- The EIR should consider quality of life impacts, particularly nuisances created by ongoing construction activities, stresses from needing to relocate from existing housing units and into a new unit.

- EIR should identify the existing micro climate in the area and that neighboring developments have many issues such as mould and mildew, causing respiratory issues for occupants.
- An initial study needs to be done for the project. **(THIS WAS NOTED AS THE NEED FOR A FINANCIAL FEASIBILITY STUDY, INCORRECTLY NOTED AS 'AN INITIAL STUDY', THIS IS MORE RELEVANT NOW DUE TO PARKMERCED'S NOTED DEFAULT)**
- Adequate notice of all environmental documents needs to be given to the public. **(NOTED DOCUMENTS NOT ALL POSTED ONLINE IN RELATION TO THE PROJECT IN ONE LOCATION, SEE ALSO LACK OF NOTICE TO TENANTS FOR RECENT ENCROACHMENT PERMIT FOR SFSU'S WORK ACROSS FONT TO 755 FONT AND 300FT NOTICE LIST OF RECIPIENTS PER SFDPW, NOT ALSO CHANGES IN UPN AT SF PLANNING WEBSITE, AND CONCERNS RAISED DUE TO LACK OF NOTICE TO TENANTS, BUSINESS ENTITIES, STUDENTS)**
- All environmental documents need to be translated so that the large Russian, and Asian communities can understand the proposed project and environmental impacts. **(THIS HAS NOT BEEN ACCOMPLISHED TO DATE, PARKMERCED HAS A LARGE RUSSION AND MIXED ASIAN POPULATION SO NUMEROUS INDIVIDUALS DO NOT UNDERSTAND OR HAVE NOT BEEN ADEQUATELY NOTIFIED OF THE PROJECTS IMPACTS)**

RESPONSES TO LETTER 22

Aaron Goodman, June 8, 2010

Response 22.1

The comment suggests that the social-housing aspect of Parkmerced is not addressed in the Draft EIR. Please refer to Master Response A.1, Historic Resources, in Section III.A, Master Responses.

Response 22.2

The comment states that the Draft EIR lacks an adequate survey of the full historic district boundaries and lacks an analysis of the options that do not demolish the cultural landscape. Please refer to Master Response A.1, Historic Resources, for a discussion of the potential historic district boundaries, and Master Response A.4, Alternatives, for a discussion of preservation alternatives.

Response 22.3

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures. Please see Response TR.1.2, in Section III.B, Public Hearing Comments and Responses.

Response 22.4

The comment cites to *Palmer/Sixth Street Properties v. City of Los Angeles*, (175 Cal. App. 4th 1396 (2009)) and *City of Marina vs. Board of Trustees of CSU*, (109 Cal. App. 4th 1179 (2003), Supreme Court review 39 Cal. App. 4th 341(2006)) in regard to the loss of rent-controlled housing. Please refer to Responses TR.20.2 and TR.20.3 for a discussion of rent control.

Response 22.5

The comment states that the San Francisco Historic Preservation Commission's hearing on June 2, 2010 was not properly noticed and was held at an inconvenient time. The San Francisco Historic Preservation Commission convenes the first and third Wednesday of each month at 12:30 PM. Historic Preservation Commission hearings are open to any interested member of the public. The Draft EIR hearing for the Parkmerced Project was properly noticed through the publication of the agenda one week prior to the hearing. For agenda items other than landmark / historic district designations and Certificates of Appropriateness, publication of the agenda one week prior to the hearing is the only public notification provided by the Historic Preservation Commission.

Response 22.6

The comment asserts that scoping comments submitted on the May 20, 2009, Notice of Preparation have not all been adequately addressed in the Draft EIR. The Planning Department distributed a Notice of Preparation on May 20, 2009, announcing its intent to prepare and distribute an EIR. The public review period began on May 20, 2009, and ended on June 19, 2009. A Public Scoping Meeting was held on June 8, 2009. Twenty-seven individuals spoke at the Public Scoping Meeting. During the public review period, 26 comment letters were submitted to the Planning Department by public agencies and other interested parties. The Public Scoping Summary Report is included as Appendix A of the Draft EIR.

All oral and written comments on the Notice of Preparation were reviewed and evaluated. Comments pertaining to potential environmental impacts or issues were considered and incorporated into the Draft EIR, where appropriate. Many of the comments received on the NOP, however, were comments not on the scope of the analysis of environmental effects, but rather on the merits of the Proposed Project or suggestions regarding how to modify the development program. For example, comments were raised suggesting a direct connection from the Project Site to BART. This suggestion was not analyzed in the Draft EIR, as it is beyond the scope of the defined project. Other comments requested analysis of the Project's financial feasibility and information about the target demographic. These types of comments do not raise issues related to environmental impacts and are not subject to analysis in an EIR pursuant to CEQA, or the CEQA Guidelines, and therefore were not discussed in the Draft EIR. Comments on the merits of the Proposed Project or other non-CEQA issues may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.

Rick
Cooper/CTYPLN/SFGOV
06/11/2010 09:25 AM

To jtilley@consultturnstone.com
cc
bcc
Subject Fw: Comment on DEIR, Park Merced: water sufficiency



"Steve Lawrence"
<splawrence@sbcglobal.net
>
06/10/2010 05:40 PM

To <bill.wycko@sfgov.org>
cc
Subject Comment on DEIR, Park Merced: water sufficiency

Mr. Wycko, please accept this Comment to the Draft EIR for the Park Merced expansion.

Will there be sufficient water to serve all proposed San Franciscans? Recent action of the SFPUC, which supplies our water, mean that supplies may be much more limited than was expected just 2.5 years ago. Through 2018 SF may be limited to less than 75 million gallons per day (average annual) of (mostly) Hetchy drinking water. While some groundwater is being developed, and recycled water is planned to replace groundwater for irrigation, freeing groundwater for potable supply, these alternative sources remain unproven. Groundwater could be contaminated; recycled water is not potable and could contaminate groundwater; quantities may prove less than hoped.

23.1

23.2

San Francisco's demand is hardening. Bad things can increase demand. An epidemic could require much more washing. An earthquake could break small water pipes, drawing water that leaks away, increasing demand for months after the quake. Global warming could increase demand, while drought could shrink supply. San Francisco is planning to grow its population and counts on that population to use less water per capita than has been used in modern times. Wise?

In 1906 San Francisco learned that the ability to just barely get by was unwise where an earthquake and fire could change the need for water in a minute. We must not forget that lesson. It is seems unwise not to have surplus capacity. The extraordinary will eventually happen. Then we must have sufficient water to meet the crisis.

Also, the draft EIR is simply too optimistic. While 81 mgd is set aside for retail demand, 6.1 of that is out-of-city retail over which San Franciscans have little or no control; nor is that demand expected to decline. Also, the City of Hayward may take as much water as it needs. (Wholesale customers are supposed to step in and reduce their demand to compensate for Hayward; whether they can or will remains unknown.) The Draft EIR calls for 10 mgd more groundwater, recycled and conservation, but this is uncertain, recycled is not potable nor usable in the potable system, and "conservation" is not really a supply of water, although it is treated as one by our authorities. Try using conservation to douse a post-earthquake fire. The Draft EIR makes it sound as if 81 + 3.5 +10 mgd is available to city users; not so. Also, while you count on that quantity from end of WSIP, say 2015, through 2030, there likely will be a drought during those years. Indeed we are overdue for one, have enjoyed quite a beneficent past decade, compared to past history, which is likely more beneficent than will be the globally warmed future. You count on 4 mgd from recycled, but plans have stepped down from 10 mgd (2003), to 4.1 mgd and 4 mgd (2005), to 2.1 mgd (about 2008). While Eastern Recycled water plans have since been added, they are vague; no study of where such would be used, how much, and how much it would cost have been completed to my knowledge. Reliance on such inchoate plans is unwise. While far less dense jurisdictions have successfully used recycled water, for irrigation, San Francisco is a densely populated city with few

23.3

23.4

large irrigation needs; and it is and will tap its groundwater for drinking. There is no assurance that recycled water, especially on the east side, will be successful, and counting on it at this stage is not prudent. As for projected demand, what population assumptions underlie projected demand of 93.42 mgd in 2030? My guess is that San Francisco's population has already exceeded, or come close to, the assumed 2030 population. The city is rapidly becoming more densely populated. In an emergency this puts greater strain on emergency response capabilities, including water. Your draft EIR counts on more supply than is real, for fewer people than there are and will be, and it ignores the need to plan for emergencies that will happen.

23.5

23.6

Steve Lawrence

RESPONSES TO LETTER 23

Steve Lawrence, June 6, 2010

Response 23.1

The comment asks if there will be sufficient water to serve all San Franciscans in the future. Please see Response 14.3.

Response 23.2

The comment raises concerns about the proposed use of groundwater and recycled water, stating that groundwater could be contaminated, recycled water is not potable, and quantities may be uncertain. As stated in the EIR in Chapter III, Project Description, p. III.47, the use of groundwater wells may be considered if a municipal supply of recycled water is not available, or if the request for use of non-potable water to be made available for irrigation of green spaces and toilet flushing is not approved. Groundwater would not be used for the potable supply, nor would recycled water be used for potable water uses, in accordance with Title 22, Division 4, of the California Code of Regulations. Also, please see Response 14.3.

Response 23.3

The comment asserts that the Draft EIR is not correct in stating that there would be sufficient water to serve the Proposed Project, as well as future demand. Please see Response 14.3. The comment cites information from the Draft EIR regarding existing and future Citywide water supplies in Table V.K.6: Comparison of Projected Water Supply and Demand for Normal, Single Dry, and Multiple Dry Years, on p. V.K.16, that indicates that the City plans to develop up to 4 million gallons per day (mgd) of recycled water as part of its overall future supply. This data is from the Water Supply Assessment (WSA) prepared for the Parkmerced Project that was adopted by the San Francisco Public Utilities Commission in a public hearing in November 2009. The information about future water supply in the WSA is based on the SFPUC's adopted Water System Improvement Program (WSIP). The WSIP consists of over 20 facility improvement projects, one of which is to develop recycled water in San Francisco and other locations, including providing treatment, storage, and distribution facilities for about 4 mgd of recycled water for non-potable uses such as landscape irrigation at various parks and golf courses on the west side of the City.¹ As recycled water projects are planned, the amount of recycled water demand may be refined, but it is likely that other appropriate sources of alternative water supply,

¹ San Francisco Planning Department, *Final Program Environmental Impact Report for the SFPUC's Water System Improvement Program*, Case File No. 2005.0159E, State Clearinghouse No 2005092026, certified in October 30, 2008, Table 3.10, pp. 3-49 – 3-56.

such as groundwater, would make up the difference.² This information provides a sufficient basis for the analysis and conclusions regarding water supply availability in the Parkmerced EIR.

Response 23.4

The comment states that reliance on recycled water is unwise. Given the uncertainty of the availability of recycled water, the Parkmerced WSA provides a conservative water supply analysis without assuming that recycled water would be used at the Project Site (see p. V.K.14 of the EIR). Conclusions in the WSA do not consider additional water supply sources beyond SFPUC's supply estimates. The WSA found that the City's water supply is sufficient to meet the projected demand for the Proposed Project without use of recycled water. As discussed above in **Response 23.2**, if a municipal supply of recycled water is not available for Parkmerced, or if the request is not approved, groundwater wells might be developed to meet all or a portion of the non-potable water demand on the Project Site. Other options to reduce potable water demand at Parkmerced could range from tanks that would hold captured rainwater to a small on-site wastewater treatment system (see Chapter III, Project Description, p. III.47). Because the analysis of impacts on water supply assumes that none of these options would be implemented, the conclusions in the EIR are conservative.

Response 23.5

The comment states that the availability of recycled water is uncertain. Please see Response 23.4 above.

Response 23.6

The comment asserts that the Draft EIR is not correct in stating that there would be sufficient water to serve the Proposed Project and states that the population in San Francisco has already exceeded or come close to the assumed 2030 population. Please see Response 14.3.

Population assumptions used in the EIR for the development projections in Appendix D: *Final Water Supply Assessment for the Proposed Parkmerced Project*, are similar to population projections for San Francisco identified by the U.S. Census and Association of Bay Area Governments. As stated in the EIR in Section V.C, Population and Housing, pp. V.C.1-V.C.2, in 2000, the population of the City and County of San Francisco was recorded by the U.S. Census as 776,733. By 2030, the Association of Bay Area Governments projects a total population of 934,800. The development projections in Appendix D state that in 2000 the population of the City and County of San Francisco was 756,976 and project a population of 916,800 by 2030.

² *Ibid.*, p. 3-22.

Jim Musselman

<jyminsf@yahoo.com

m>

To Rick.Cooper@sfgov.org

06/12/2010 07:29 PM

cc Bill.Wycko@sfgov.org

Subject

My comments on ParkMerced project -please forward my comments to Bill

Wycko

Dear Mr. Wycko:

I read on the Planning Dept. website at [http://www.sf-planning.org/ftp/files/MEA/2008.0021E Parkmerced NOA.pdf](http://www.sf-planning.org/ftp/files/MEA/2008.0021E_Parkmerced_NOA.pdf) that I can submit comments to your

department through June 18th on the proposed Parkmerced renovation project (Planning Department Case #2009052073). Here are my comments. Please ensure that that the Planning Department receives and reviews my comments. (I will try to cc Bill Wycko, but I can't be sure I have his email address correct.) Thank you.

My comments: I believe the planned renovation and expansion of ParkMerced would have a major detrimental impact on the entire surrounding area of the City and County of San Francisco. I live close to ParkMerced -- only a few blocks away on Byxbee Street. The approximately threefold increase in the number of residents of ParkMerced will have major detrimental effects on traffic, parking, municipal transit services, other municipal services, and overall quality of life in this neighborhood. ParkMerced is great just the way it is. It has a healthy balance of housing and open space. It has been developed in a very pleasant and aesthetic way. Its layout has a calming effect on the residents and the neighbors like me. Tripling the population of this development will turn it from a peaceful development into a rat maze. Please do not allow this proposed redevelopment to go forward. Please preserve our neighborhood as a nice, attractive, quiet, beautifully landscaped place to live. Help preserve our quality of life here in the southwest corner of San Francisco.

Respectfully submitted,

Jim Musselman

266 Byxbee Street

San Francisco, CA 94132

RESPONSES TO LETTER 24

Jim Musselman, June 12, 2010

Response 24.1

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy or the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

To: pic@sfgov.org
From: "Daniel W. Phillips" <daniel.w.phill12521@att.net>
Date: 06/13/2010 06:08PM
Cc: admin@parkmercedresidents.org
Subject: Parkmerced

Dear respected members of the Preservation,

I am unable to attend your Wednesday 1:30 meeting. Please add
the
following to your record:

(Embedded image moved to file: pic11256.gif)

Parkmerced was begun in 1939 by The Metropolitan Life
Insurance copy.
It was originally to be a 191 acre development. But, acreage
North of
Font Boulevard between Tapia Drive and Lake Merced Boulevard
was never
developed as part of Parkmerced. This left a 150 acre
development.

Progress in building, especially during World War II was
slow.
Resources were needed for the war effort. However, after the
war
progress was accelerated to accommodate returning veterans and
their
families.

Because of its distinctive road patterns and architectural
cookie
cutter style Parkmerced was not considered to be really a part
of San
Francisco by its native born. It was indeed "modern" by the
standards of
the time. Parkmerced continued as a community aside from San
Francisco
—a community restricted to white gentiles.

Metropolitan Life later sold Parkmerced to the Helmesley Corporation.

Outwardly it looked the same and the flower beds in the traffic circles were changed on a monthly and wasteful schedule. Meanwhile deterioration set in. Parkmerced was aging.

Carmel Corporation purchased Parkmerced in the late 1990's and a lack of regard for residents set. This included tearing out existing shrubbery and putting in a new, uncontrolled, irrigation system. As usual, Carmel tried to pass this capital investment through to the residents.

In 2005 Rob Rosania purchased the property for an exorbitant price.

But, immediately improvements in resident relations began, as well as park wide improvements. The eleven towers had the elevators rebuilt to respond and operate more efficiently. The dark lobbies were refurbished with more windows, and ADA access was added to all towers.

Diseased trees were removed, partly because of a beetle infestation, and partly because some were dying. Replacement trees were planted, from saplings to 20 foot tall redwoods.

The most touted feature of Parkmerced are the town homes with their unique courtyards designed by Thomas Doliver Church. The courtyards range from spectacular terraced court yards with curvilinear terraces to drab courtyards which often are junky because residents are not responsible for themselves. Unfortunately, these courtyards are in the back of the rapidly deteriorating town homes, and unless one makes the

effort one never sees them. As beautiful as some courtyards
are they are
no ADA accessible, and to make them so would be counter to
expert
preservationist intent.

Yes, there is much worth saving in Parkmerced, but at what
cost?

Archaic cookie cutter buildings will continue to age beyond a
useful life

without the modern electrical services our society takes for
granted.

25.1

Let Parkmerced Investors proceed with their plans.

RESPONSES TO LETTER 25

Daniel W. Phillips, June 13, 2010

Response 25.1

This comment expresses general support for the Proposed Project but does not raise any specific comment on the adequacy and accuracy or the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Page
1

To: Bill Wycko,
Environmental Review
Officer, San Francisco
Planning Department.

Dr. Terence Faulkner, J.D.
Parkmerced Residents' Organization
Board of Directors Member

Re: Draft Environmental
Impact Report (EIR)

106 Crespi Drive
San Francisco, CA 94132-2424

For Parkmerced
Project [Case No.

Phone: 415-286-8687.

June 14, 2010

Project [Case No.

2008.0021E, State Clearinghouse No. #2009052073].

Dear Bill Wycko:

The EIR for the Parkmerced Project raises a host of issues:

(A.) "Prospective Incapacity To Financially Perform" appears to be the first problem of the Parkmerced Management in dealing with economic proposals contained in this EIR. Based on the public statements of Parkmerced Management, as recently stated in the San Francisco Chronicle and many other media publications, there appears to be considerable doubt as to whether Parkmerced Management will be able to raise the needed \$500,000,000 [more or less] to avoid going into mortgage and/or deed of trust default in October of 2010.

(B.) Should Parkmerced go into financial default, a foreclosure sale of

RECEIVED

JUN 16 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

Page
#2

Parkmerced to a NEW BUSINESS ENTITY is highly likely. A similar result is also possible by a private sale to a NEW BUSINESS ENTITY before an October 2010 financial failure.

(C.) What a NEW BUSINESS ENTITY might want to do with Parkmerced is very uncertain. The San Francisco Planning Department would be well advised to POSTPONE ANY ACTION on the highly questionable current EIR until at least December of 2010 or a later date.

(D.) On the general merits of the EIR, assuming Parkmerced Management were (unexpectedly) in a financial position to act upon it, the proposals of Parkmerced Management have virtually NO PUBLIC SUPPORT among the residents of Parkmerced nor in the surrounding community. The many public presentations of

26.1
con't

26.2

Page
#3

the current Parkmerced Management regarding their so-called "vision" for a new Parkmerced have been widely questioned and rejected at community meetings. To put the matter bluntly, the so-called Parkmerced "vision" has NO POPULAR SUPPORT anywhere among local residents or voters.

(E.) The EIR represents an extreme and unpopular set of rebuilding plans by Parkmerced Management, probably proposed in an attempt to attract new funds for the financially troubled Parkmerced.

(F.) Speaking as a longtime incumbent County Central Committeeman, who has served in San Francisco elective public office for most of the time since 1974, Parkmerced Management's EIR proposals would almost certainly be rejected by a WIDE MARGIN by San Francisco voters if ever put on the local election ballot.

26.2
con't

Page
#4

Even a gifted campaign manager would have a difficult time "selling" these EIR proposals to voters. The EIR is -politically- an unsaleable "TURKEY".

(G.) When, as is likely, a NEW BUSINESS ENTITY takes over Parkmerced, its management would be wise to dump the current EIR and start a fresh new plan for Parkmerced.

Best wishes,

Terence Faulkner

P.S.: I attended the Parkmerced Residents' Organization (PRO) Board of Directors meeting (in late 2009) at which we came out against the so-called Parkmerced "vision" proposed in the present EIR. It is filled with bad ideas and poor city planning.

26.2
con't

RESPONSES TO LETTER 26

Dr. Terence Faulkner, June 14, 2010

Response 26.1

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project, citing recent financial media coverage of the Project Sponsor. Please see Response TR.1.2, in Section III.B, Public Hearing Comments and Responses, for a discussion of this issue.

Response 26.2

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy or the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Letter 27
RECEIVED

JUN 16 2010
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

To: San Francisco Planning Commission (W/yeck, et al.)
Fr: Bernard Choden
85 Cleary Ct., # 11
San Francisco, Ca., 94109
Em: Choden@sbcglobal.net
Re: Park Merced EIR

June 16, 2010

EIR's requiring mitigation requires proof of the availability of mitigation resources, means and commitment. There must be an appropriate finding by the Planning Commission in concert with the developer (Public Resources Code Sections 21081.6 et.al.).

Among the mitigations proofs needed are:

Seismic safety construction and on site first response for disaster relief: The project is within ¼ mile of the San Andreas fault.

27.1

Gentrification mitigation: HUD, region IX, indicates that less 90% of the city's residents can afford to enter either the rental or ownership market without subsidy assistance. Further, recent state Supreme Court rulings strongly indicate that contractual arrangements between the developer and the city on behalf of existing or future tenants that would ameliorate their rents are not legal. This administration is not a neutral steward of either the city's or tenant's interest in terms of a contractual arrangement. Therefore, proposed means of mitigation of these effects is not effective.

27.2

Affordable housing mitigation: The city does not have a Housing Element that recommends means of implementation or resources for the extreme shortfall of the city's housing needs or provides for the adoption of such efficacious and efficient means of implementation by the city/county. This severe limitation is under court challenge. Therefore, the city cannot impose either resources or means for mitigating the inflationary impact of the development will have on affordable housing and businesses in the project or the neighborhood.

The proposed pre-emption of the project's family housing by university student exacerbates the problems caused by the project's inadequate family housing proposals.

Financial capacity of the developer: This financially distressed firm cannot provide the needed mitigation resources without upgrading the permitted density by the city beyond the city's potential infrastructure and

27.3

Letter 27

services capability. Without such committable resources, there cannot be a cure.

27.3
con't**A mitigation to address identified problems:**

In order to lessen the financial pressure on the developer for an overly dense and destructive proposal, I would like to indicate an institutional arrangement that would benefit the developer and the tenants alike in order to illustrate that there is a partial means of mitigation of all of the above problems and provide a project within the scale of the city's infrastructure capabilities and service needs.

1. Authorize an independent redevelopment area for the entire impacted area for which the residents would have PAC representation and the developers would have a means of obtaining tax increments and other financial assistance.
2. Incorporate the tenants into a limited equity cooperative that would preserve the long-term affordability of the tenants and, yet, provide for accommodation as their aging life style needs change. Affordability would remain regardless of resident turnover. The cooperative could be a likely recipient of public financial and institutional assistance as for example, underwriting of low cost revenue bonds.
3. The cooperative could hire the developers to continue management and development of the project. This process would both permit a lowered, more feasible and accommodating scale of development, yet, provide a means of alleviate the developer's fiscal stringent needs.

27.4

RESPONSES TO LETTER 27

Bernard Choden, June 16, 2010

Response 27.1

The comment states that the effectiveness of the Draft EIR's seismic mitigation measures needs to be proven due to the Project Site's proximity to the San Andreas Fault. Please see Master Response A.3, Seismic Hazards, in Section III.A, Master Responses.

Response 27.2

The comment states that the Draft EIR should include gentrification or affordable housing mitigation for residents that cannot afford to either rent or own. Please refer to Response TR.2.2, in Section III.B, Public Hearing Comments and Responses.

The comment states that the pre-emption of the Proposed Project's family housing by university students exacerbates affordability issues. Please refer to Response 17.15.

Response 27.3

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project and implement the proposed infrastructure improvements. Please see Response TR.1.2.

Response 27.4

The comment proposes several mitigation measures that provide an institutional arrangement that would benefit the developer and tenants to lessen the financial pressure on the Project Sponsor, including establishing a redevelopment area for Parkmerced and developing a limited equity cooperative, which could be a recipient of public financial assistance. The proposed structure of the ownership entity is outside the scope of the EIR because the City lacks the legal authority to require a change in the ownership of Parkmerced.

[PARKMERCED] – Draft Environmental Impact Report
SUMMARY OF ISSUES PRESENTED TO SF Planning Commission June 17th, 2010 5:30pm

SUSTAINABILITY: Proposed as a “total-tear-down” of the garden apartment units (1,538 units) [Not including the +284 apartments in the University Park South (SFSU-CSU) purchased blocks which are a prior part of Parkmerced’s original development proposed also for demolition that = 1,843 total units demolished]. The overall loss of imbued energy due to recent renovations of the garden units in Parkmerced and UPS, and the proposed demolition of overall landscape/buildings/walkways/roadways. No independent documentation or “proof” of deterioration of units in terms of a “soundness-report” has been determined (See the SFDBI determination for “soundness-evaluation” prior to the demolition of older historic homes). No analysis is made by the project owner(s) on the total demolition “waste” of renovated units, and imbued energy of the towers and garden units in terms of demolition has been documented or presented to date.

28.1

PRESERVATION: The Importance of Parkmerced’s history in San Francisco, the integrated landscape design, urban beaux-arts street pattern, architectural/urban planning history in the cities development, its unique individual internal modern courtyards by Thomas Dolliver Church, *“are eligible as a masterplanned garden rental community and cultural landscape to the state and national register”* – (Parkmerced CEQA Historical Resources Analysis [Draft] by Page & Turnbull), is not addressed in either the SFSU-CSU “Masterplan” programmatic EIR, or the Parkmerced “Vision” DEIR in the analysis by Page & Turnbull in their CEQA Historical Resources Analysis to a significant level in the options presented as alternatives.

28.2

NATURAL ENVIRONMENT: Cut-Down and removal of +/- 1,500 trees (canopy loss) and green landscape adjacent to a migratory area and coastal areas of Lake Merced, effect of run-off during 15-20 years of ongoing construction.

28.3

TRANSPORTATION/PARKING: Proposed SFMTA/Developer collaboration on the financing and re-route/dead-ending of public transit by a private developer inside of Parkmerced, and the location of (3) transit stops in a (.18 mile) radius in a residential zoned neighborhood. [Note: one stop is noted specifically “to accommodate SFSU Students”. SFSU’s “fair-share” transit impact fees were \$175,000.00 see City of Marina vs. CSU] Parking spaces are proposed to be increased to 11,000 from 3,500 with 1:1 parking in a heavily re-graded site.

28.4

OPEN-SPACE: The proposed eradication of living/earth green space is a reduction of 2/3rds the total open space. Parkmerced was built originally at 191.2 acres for the 3,221 units and 8-10k population, the current area was reduced to 112 acres due to land-sales of prior owners, and is a huge loss of prior amenities, recreation and future open-space, shared space, soft/hard-scape internal courtyards, walkways. The inaccuracy is visible in the DEIR SOM’s diagrams for “existing” open space prior which leaves off prior recreation and open space (755 Font, and 800 Brotherhood Way), and the soft/hard-scape areas of the internal courtyards. The open space minimum “per unit” is not mentioned or determined in terms of livable open space required per unit or per inhabitant for a healthy community. MOU’s negotiated prior and currently ignore the effects on Parkmerced, in its loss of open-space.

28.5

RETAIL ENVIRONMENTAL IMPACT/SFUSD IMPACT: Proposed 310,000 g.s.f. of retail which is equal to (3) Walmarts, and the after-effect on existing retail areas, on Ocean Ave., West Portal, Stonestown, Cambon Shopping Center, Westlake, Lakeside Plaza, Oceanview retail areas is not mentioned. The SFUSD sold off the prior elementary school “Frederick Burke Elementary” and thus eliminated a public school within walking distance to the largest low-mid income rental community in the city. Adjacent School facilities will be heavily impacted by increased population, and traffic without an adjacent school site in walking distance to the community. The loss of the school and amenities including sufficient playgrounds and open-space has caused an exodus of families on site.

28.6

[PARKMERCED] - Draft Environmental Impact Report
SUMMARY OF ISSUES PRESENTED TO SF Planning Commission June 17th, 2010 5:30pm

RENT-CONTROL IMPACTS: Current pipeline and Build-up of luxury housing citywide vs. construction of essential affordable rental housing. SFSU-CSU Memorandum of Understanding (ignored community impacts -1,000 units of rental housing in the purchase of the Stonestown Apartments and Parkmerced University Park South Blocks, and reliance on Parkmerced for Student Housing by Institutional Development and Population increase in the SFSU-CSU "Masterplan" EIR. The rent-control status of units rennovated and the development of new units and rent-control status is based on the Palmer vs. 6th decision currently. With a mix of rental and for-sale units, and a lack of new rental units, rent-control is threatened at the ballot-box.

28.7

FINANCIAL FEASIBILITY: Due to the financial market impacts on both the SFSU-CSU campus, and the Parkmerced Investors LLP's loans, and costs for the entire build out of both projects, assurances must be made that the projects can and will be completed regardless of options selected. Why should we not look again at the purpose of parkmerced and the communities best interests and re-investigate the options rejected such as the "infill" option, the existing commercial core, or direct routing to daly city bart to look responsibly at the needs of the city not just the needs of the developer's profit model.

28.8

LACK OF "SUSTAINABLE" PRESERVATION/TRANSPORTATION/EQUITY DENSITY ALTERNATIVES

PER CEQA: The proposed alternatives to protect the landscape design are poor in concept and architectural concept/layout in the possibility of in-fill housing they propose. The alternatives ignore a significant proposal to protect the entire prior landscape design and masterplanned boundary of Parkmerced's original design in its entirety. There is no proposal to demolish the towers and build taller towers as a significant alternative. There is no alternative to directly connect to regional transit, route the Muni lines and station stops outside of Parkmerced's boundaries down Holloway, or Brotherhood Way, and locate/condense Muni stops between Stonestown and SFSU along the western edge of 19th Ave as suggested by the SFPUC, and create a new hub track-layover and maintenance area at the eastern edge of Parkmerced through a tunneling option along 19th/Junipero Serra Blvd., or layered approach to transit/traffic/parking along the 19th Ave. corridor and the 1952 interchange at Brotherhood way directly to Daly City BART. There are no "Equity" density solutions proposed to build up and re-zone Stonestown, Stonestown Apartments, and SFSU's prior campus boundaries and smaller portions of sold-off parcels of Parkmerced along with utilization of the Mills-Act to preserve the low-scale garden units with Parkmerced as a equitable solution. The one significant solution that protects the open-space and landscape design as a whole was rejected by the SF Planning Department and current owners as "not-meeting-there stated goals and objectives" which was Alternative 3 in the draft Historic Resources Analysis by Page and Turbull, and is noted in the DEIR as "rejected" option G-a. There also is no option showing the revitalized retail component area at Cambon, and how by allowing more density on the eastern edge removing parking garages, and by layering the construction of transit, housing, parking and tunneling under portions of 19th ave, we could save Parkmerced include the Mills-Act, and build new essential units while protecting what is UNIQUE in San Francisco.

28.9

As we will be limited by the SF Planning Commission in Comment's, I strongly urge you to your support of the principles of the SF General Plan, in opposition to the current limited options in the DEIR and to sign below and submit it to the SF Planning Dept. EIR Officer Bill Wycko by 5:00pm June 28th 1650 Mission St., Suite 400 San Francisco, CA 94103

Name: BERNARD CHODEN Date: 6/16/10
Name (Print) B. Choden
Address: 85 CLEARY CT #11
SF 94109

RECEIVED

JUN 27 2010
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

RESPONSES TO LETTER 28

Bernard Choden, June 16, 2010, and Aaron Goodman, June 19, 2010 (Petition)

Response 28.1

The comment states that no analysis has been done with respect to sustainability of the Proposed Project given demolition, waste and loss of imbued energy in existing structures to be removed; and that no documentation of the “soundness” of existing units was conducted. Please see Response TR.25.6 for discussion of demolition and sustainability, and Response 54.A.8 for a discussion of the soundness report, in Section III.B, Public Hearing Comments and Responses.

Response 28.2

The comment notes the historic and architectural importance of Parkmerced, including its landscaping components and eligibility for the State and National Register, and suggests these issues are not addressed in the Draft EIR. Please refer to Master Response A.1, Historic Resources, in Section III.A, Master Responses.

Response 28.3

The comment remarks upon the removal of approximately 1,500 trees in a migratory area and the potential effects of run-off during ongoing construction. Please see Response TR.17.2 for a discussion of the impacts of tree removal on the bird population.

The potential impacts of construction on soil erosion and stormwater runoff are discussed in the EIR in Section V.N, Geology and Soils, pp. V.N.11-V.N.12. The Proposed Project would adopt Best Management Practices to avoid erosion and would develop a Stormwater Pollution Prevention Plan. Mitigation Measure HY-1, p. V.N.11, details the elements of the Stormwater Pollution Prevention Plan that would be developed for all construction activity on the site and the regulatory framework and permitting process that would implement the plan. The plan includes, but is not limited to, practices for soil stabilization, watering for dust control, silt fences, and minimizing grading during the rainy season.

Response 28.4

The comment notes proposals for transit changes as part of the Proposed Project and the large increase in the number of parking spaces and the provision of 1:1 parking for residential units. The comment does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Response TR.5.4 and Master Response A.2, Transportation and Circulation, Section 2.3, for additional discussion of the Proposed Project’s parking supply.

See also Master Response A.2, Transportation and Circulation, Section 2.3, regarding the relationship of proposed parking to the City's Transit First policy, and see Response TR.5.4.

Response 28.5

The comment describes the changes to the Parkmerced site since it was initially developed and suggests that the loss of open space be based on the historic size of the Parkmerced site as opposed to its current size. Under the baseline using the historic site, the comment asserts that the reduction in the amount of open space constitutes a loss of 1/3 of the original open space. The extent of the original Parkmerced development – approximately 192 acres – is identified in the EIR in Chapter III, Project Description, on p. III.4. The existing conditions at Parkmerced – a 152-acre project site with 75 acres (3,269,300 square feet) of open space – are also identified on pp. III.4 and III.6 and form the basis against which the potential impacts of the proposed project are analyzed per *CEQA Guidelines* Section 15125(a). *CEQA Guidelines* Section 15125(a) states that “an EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives.”

In addition, the comment asserts that the use of open space per unit or per inhabitant be used in the open space analysis. The current amount of open space on the Project Site is 75 acres. The loss of 7 acres of open space, or 305,100 square feet, amounts to a 10 percent reduction in the amount of open space provided on the project site. As described in the EIR in Section V.J, Recreation, on p. V.J.9, the total amount of on-site open space that would be provided under the development program is about 3.4 acres of open space per 1,000 residents. This would be a reduction of approximately 6.8 acres of open space per 1,000 residents (based on 75 existing acres of open space and approximately 7,340 existing residents, as identified in Section V.C, Population and Housing, on p. V.C.4. Thus, under the proposed development program there would be a reduction in the amount of open space per unit, per resident, and per 1,000 residents. Nevertheless, as shown in the EIR in Figure III.8: Proposed Publicly Accessible Open Space Plan, p. III.21, and described on pp. V.J.7-V.J.10, the proposed mix of recreation facilities and open space, i.e., more playgrounds and athletic fields, streams, ponds, community gardens, and an organic farm, and the geographic distribution of the new open space and recreation facilities across the Project Site would provide greater accessibility to recreational resources, and would further reduce the already less-than-significant impacts on existing open space facilities. Furthermore, as described under Impact RE-1 on pp. V.J.7-V.J.10, access to nearby recreational facilities, especially the Lake Merced Complex and Fort Funston to the west, are important site

planning and design concepts that would better connect the Parkmerced neighborhood to other City resources.

Response 28.6

The comment indicates that the expected population increase would impact San Francisco Unified School District facilities as well as open space on the project site. The comment identifies the sale of the San Francisco Unified School District property that once housed the Frederick Burke Elementary School and the loss of open space as a reason for families leaving the neighborhood. Please see Response 14.4 for a discussion of the school impact analysis and Response 2.7 for a discussion of the existing and proposed publicly accessible open space.

Please refer to Response TR.11.3 for a discussion of the impact of the proposed retail space on nearby commercial areas.

Response 28.7

The comment expresses concern about the viability of maintaining rent control status for units in the Proposed Project and cites recent case law affecting rent control. Please see Responses TR.20.2 and TR.20.3.

Response 28.8

The comment expresses concern about the financial feasibility of the Proposed Project and asks for a “re-investigation” of the “infill” option. Please refer to Response TR.1.2 for a discussion of financial issues and the purpose of the EIR. Please see also Master Response A.4, Alternatives.

Response 28.9

The comment states that the Draft EIR should include a sustainability alternative. Please refer to Master Response A.4, Alternatives.

June 17, 2010

RECEIVED AT CPC HEARING 6-17-10
2008.0021E
(R. COOPER)

Good Afternoon Commissioners,

My name is María Elena Guerrero Engber

I am here to express to you my opposition to the City of San Francisco, Planning Department Draft Environmental Impact Report for Parkmerced Project, 3711 Nineteenth Avenue.

My reasons to oppose the Parkmerced Project as presented by the Sponsor are so many, that I will only be able to mention a few here.

My family and I, have called Parkmerced home for the last twenty years, my mother and I have resided in the same unit on building # 40 for the last seventeen years, since 1993.

This Environmental Impact Report has not stressed enough the effects that this Project, if approved will have on the current over 7,260 Parkmerced residents' health and quality of life.

29.1

Under this EIR alternative the effect on trees will also be devastating as hundreds of trees will have to be cut, and the bird population nesting on the trees will be removed.

29.2

I strongly believe that not one tree should be cut or relocated. Not one bird should be displaced by the destruction of their habitat.

The only acceptable alternative for me on this EIR is the No Project Alternative, leaving Parkmerced as is now, without any changes or constructions and to declare it a landmark historical site.

29.3

According to the Draft EIR and I quote, the impact on:

HISTORIC ARCHITECTURAL RESOURCES, TRANSPORTATION, CIRCULATION, NOISE AND AIR QUALITY WILL BE SIGNIFICANT AND UNAVOIDABLE.

THE IMPACT ON WIND WILL BE POTENTIALLY SIGNIFICANT AND UNAVOIDABLE”.

On Volume 1 Chapter V, Page VG-24 of the Parkmerced EIR, I quote:
“ Impact AQ-3 Construction of the Proposed Project could expose persons to substantial levels of toxic air contaminants, which may lead to adverse health effects. (Significant and Unavoidable). (Criteria G.b, G.d)”

June 17, 2010
Parkmerced EIR Hearing

I did not see mentioned on the EIR how the cost of the asbestos removal on 1,528 units that if demolished even on four phases, is going to be dealt with by the City and by the present or future owners of Parkmerced.

What are the preventive measures that will be taken to avoid that thousands of old and new residents get lung cancer caused by prolonged asbestos exposure?

29.4

I am convinced that if this Project is approved, it will cause me and my family to get sick by the pollution and air contamination produced by the constant demolition and construction around my home for years to come. Even if the 3,221 existing units are kept as they are now and 5,679 new units are built, this alternative **is also unacceptable to me for the same reasons.**

According to phase # 1 of this Project, (Volume 1 - Chapter VII.7) several other buildings will be built from 2010 to 2015 around building # 40 where I live.

What lender will want to risk the capital needed to finance construction of this Project now, that the value of the asset is worth much less? What will happen to the Project if Parkmerced goes to the auction block if the debt cannot be restructured by the present owners? Where is the 1.3 billion needed for this Project going to come from?

29.5

Please ask yourselves how would you like to live in a massive construction and demolition site for the next twenty to thirty years? Would you expose your own families to asbestos and other cancer causing substances produced by air pollution and to constant and excessive traffic and construction noise?

29.6

Why do the Present owners of Parkmerced and the San Francisco Planning Department, want to destroy the beautiful Avenues at Parkmerced by changing the Muni-M route, building rails and bringing a train inside the complex that will cause so much destruction, noise and pollution in our beautiful and peaceful Avenues and Streets at Parkmerced?

29.7

Can you even fit 8,900 units, cars and pets in a place where there were 3,221 units before? I sincerely think that it is not possible. There is only so much density that can be placed in a pre-determined space, if not try to pour two gallons of water in a one gallon container.

29.8

Thank you very much for listening to my concerns.

María Elena Guerrero Engber
Marigen Hellen Engber de Guerrero
Residents at 310 Arballo Drive, Apt., 11 D
San Francisco, CA 94132
Telephone (415) 486-2701

RESPONSES TO LETTER 29

**Maria Elena Guerrero Engber and Marigen Hellen Engber de Guerrero,
June 17, 2010**

Response 29.1

The comment asserts that the Draft EIR does not adequately address health and quality of life impacts. Please see Response TR.17.1, in Section III.B, Public Hearing Comments and Responses, for a discussion of these concerns.

Response 29.2

This comment states the Draft EIR alternatives would also require the removal of hundreds of trees, thus affecting the nesting bird population. Please see Response TR.17.2 for a discussion of the effects of tree removal on the bird population.

Response 29.3

This comment expresses general opposition to the Proposed Project and states that the only acceptable alternative is the No Project Alternative. This comment does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 29.4

The comment requests information on the cost of asbestos removal, expresses concerns about the risks of from prolonged exposure to asbestos, and asks about preventative measures that should be taken. Please refer to Response TR.17.4 for a discussion of these concerns.

Response 29.5

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project. Please see Response TR.1.2.

Response 29.6

This comment expresses general opposition to construction impacts should the Proposed Project be implemented but does not raise any specific comment on the adequacy and accuracy or the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 29.7

The comment expresses opposition to the rerouting of the M Ocean View light rail line through the Project Site, citing concerns about the noise and pollution that would result. Modifying the alignment of the light rail to access the site is a project feature intended to improve access to mass transit and reduce the need for automobile and other motor vehicle trips. The noise and vibration levels associated with the existing Muni light rail line are described in the EIR in Section V.F, Noise, on p. V.F.7 and in Table V.F.4: Measured Muni Vibration Levels, and Table V.F.5: Measured Muni Noise Levels, pp. V.F.9 and V.F.10, respectively. Impacts related to the proposed change in alignment are described as part of the significant and unavoidable impacts (Impact NO-5, p. V.F.27).

Response 29.8

The comment states opposition to the overall size of the Proposed Project, asserting that the Project Site is too small to accommodate the proposed amount of development, but does not raise any specific comment on the Draft EIR. The comment may be considered by the Planning Commission as part of their decision to approve or disapprove the project.

June 17th, 2010 5:30pm SF Planning Department "DEIR" hearing on Parkmerced

Project DEIR #2008.0021E

Per CEQA Section 15064 public agencies and especially certified local governments must carefully consider ANY potentially feasible alternative which may avoid or minimize a significant environmental impact. The demolition of an entire community and cultural landscape is significant, and Per the California Resource Code Section 21002 and CEQA section 15126-6 it states that the EIR must contain a fair and thorough discussion of potentially feasible alternative(s) (note the "PLURAL") which do not involve demolition.

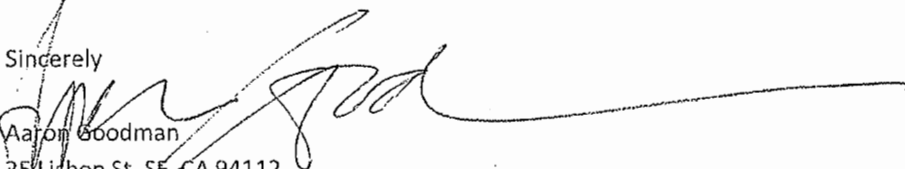
The project sponsor's and planning departments elimination of Option G-a "INFILL PRESERVATION OPTION" intentionally **UNFAIRLY** removes the one option that best serves to mitigate the loss of a cultural landscape site eligible for the state and national register. It also fails to look at the existing zoning and adjacent sold off sites, or the 19th Ave. planning department study for options in development and "equity" density as a proposal to mitigate the impacts on Parkmerced's prior boundaries. 30.1
30.2

By ignoring the entire district of Parkmerced's original 191 acres, and by submitting long-term programmatic EIR's of the SFSU-CSU Masterplan, and Parkmerced "Vision" projects ignores the options that protect the integrity of the district of Parkmerced, along with not considering cumulatively the EIR's and future proposed growth such as at Stonestown that are noted as possible future developments. The Parkmerced Investor's, SFSU-CSU Masterplanner's, and SF Planning Department's JOINT efforts at limiting the alternatives reviewed, are circumventing adequate historical resource review, the addressing of SOCIAL and low-middle income rental housing impacts and needs in the city and county of San Francisco. 30.3
30.4

This is extreme negligence in following CEQA state laws, and the parameters of the SF General Plan, by a public certified agency.

Please reconsider your prior decision to eliminate option G-a, based on financial, environmental, and historic preservation principles of sustainable redevelopment.

Sincerely


Aaron Goodman
25 Lisbon St. SE, CA 94112
aingodman@yahoo.com

cc: Bill Wycko Environmental Review Officer as submitted comments on June 17th, 2010 5:30pm

RECEIVED AT OPC HEARING 6-17-10
2008.0021E
PARK MERCED
(R. COOPER)

RESPONSES TO LETTER 30

Aaron Goodman, June 17, 2010

Response 30.1

The comment states that the discussion of the Infill Development within the Historic District Alternative, in Chapter VII, Alternatives to the Proposed Project, under Section G. Details of Alternatives Considered and Rejected, pp. VII.74-VII.77, is inadequate. Please see Master Response A.4, Alternatives, in Section III.A, Master Responses.

Response 30.2

The comment states that the Draft EIR does not analyze the original boundary of the Parkmerced Project Site. Please refer to Response TR.7.3, in Section III.B, Public Hearing Comments and Response, for a discussion of this issue. Also, the Draft EIR does not consider adjacent lots or other off-site development locations in its analysis of the Proposed Project.

Response 30.3

The comment states that the Proposed Project ignores the options that would protect the historic district of Parkmerced, and adds that the Draft EIR did not consider the cumulative effects of other projects, such as Stonestown Galleria.

General comments regarding the merits of the Proposed Project may be considered by decision-makers as part of their decision to approve or disapprove the project.

As identified in the EIR in Chapter VII, Alternatives, pp. VII.22-VII.36, Alternative C: Retention of the Historic District Core Alternative, identifies an alternative that retains the essential portions, features, and characteristics of the Parkmerced historical resource that justify its eligibility for inclusion within the California Register of Historic Resources.

Cumulative effects of potential development projects in the vicinity of the Project Site are disclosed in the EIR under cumulative impacts in the following sections: V.A, Land Use; V.B, Aesthetics; V.C, Population and Housing; V.D.a, Historic Architectural Resources; V.D.b, Archaeological Resources; V.E, Transportation and Circulation; V.F, Noise; V.G, Air Quality; V.I, Wind and Shadow; V.J, Recreation; V.K, Utilities and Services Systems; V.L, Public Services; V.M, Biological Resources; V.N, Geology and Soils; V.O, Hydrology and Water Quality; and V.P, Hazards and Hazardous Materials.

Response 30.4

The comment states that the range of alternatives analyzed in the Draft EIR is inadequate. Please see Master Response A.4, Alternatives.

505 Font Blvd.
San Francisco, CA
94132
June 17, 2010

RE: Parkmerced Project
EIR Hearing, June 17, 2010

Dear ~~Supervisor~~ *Planning Commissioner*:

I am a 25 year resident of Parkmerced. I understand that major development of Parkmerced is being planned, development that would eliminate my home and other garden apartments. Also, it is being planned to bring public transit right into our residential area. Please do not let this happen.

As a single mother and public school teacher, I could never afford to buy a house in San Francisco. My garden apartment, with its beautiful small yard that I share with other tenants, is the closest I will ever come to having my own home and yard. It has been, and continues to be, wonderful for my children growing up here. We know our neighbors, and that makes the area safer. Our safety and quality of life would be greatly diminished if we were forced to live in high rise apartments. Please give consideration to our quality of life here in Parkmerced, especially for the children and many elderly residents.

31.1

Parkmerced is a very carefully planned community that has met the needs of its residents very for 60 years. It has beautiful, open community spaces that are unique to this area and should not be destroyed.

My previous letter to the Board of Supervisors, about 6 weeks ago, was forwarded to the Parkmerced management, who then contacted me. I do not want to be evicted, so please do not forward my letter to the management. I am just sharing my personal opinion with you as a resident.

Thank you very much.

Sincerely, *Carla Lehmann*

Carla Lehmann
505 Font Blvd.
San Francisco
carlaml@earthlink.net

RESPONSES TO LETTER 31

Carla Lehmann, June 17, 2010

Response 31.1

The comment asserts that public safety and quality of life would diminish if the Proposed Project were implemented. Please see Responses 17.4 and 19.1 for discussions of the effects of increasing population density on the Project Site, and Response 20.2 for a discussion of public safety and quality of life.

RECEIVED AT CPC HEARING 6-17-10
2008.0021E
PARK STAGES
(R. COOPER)

June 17, 2010 Planning Commission Hearing

The Parkmerced Project

Final Review of the EIR

Cathy Lentz

322 Serrano Dr.

San Francisco, Ca. 94132

June 17, 2010 Planning Commission hearing for the Parkmerced Development

Planning Commissioners:

My name is Cathy Lentz. I grew up in Parkmerced. I have lived here for 57 years. In my heart and soul I feel this development project is not right.

From the beginning the New York developers have slandered the original Parkmerced built by Metropolitan Life Insurance. The developers have never acknowledged this original and innovative design meant to integrate people and nature. They have slandered the original Parkmerced design to push forward their own egocentric and impersonal design where individuals no longer matter. This design shows the domination over nature, wild life, and people. Who would risk putting 100 ft. tall windmills, even though there is new technology, in a long row on Lake Merced Blvd. right across from the lake? These windmills are probably in the flight path of birds.

32.1

Because of their slander of the original Parkmerced design I question their integrity.

Now these very developers are facing financial trouble here in S.F. in Parkmerced. Their property, Riverton, near Harlem in N.Y. is already in foreclosure.

It would be absolutely irresponsible for the Planning Commissioners to approve this plan in lieu of recent financial facts. This project should be tabled. There should be no political bailout of this development proposal. Or, we could end up with a hole in the ground and the project abandoned. Then what will happen to the 6000 residents of Parkmerced who call this place their home?

32.2

I enclose two articles for the record in my statement:

Exhibit A: New York Times article by Charles Bagli: Owners Bet on Raising the Rent and Lost
Exhibit B: by Dean Preston, Director of Tenant's Together, Parkmerced in Default: What Now for Owners' Plan to Bulldoze Over 1,500 Rent Controlled Homes?

I also include my own statements.

Thank you for your time.

Cathy Lentz
322 Serrano Dr
San Francisco, Ca. 94132

June 17, 2010 Planning Commission Meeting on the Parkmerced EIR

Planning Commissioners:

From the beginning Mr. Hartman has stated that Parkmerced was a gated , without a gate, community before there was such a thing. He states Parkmerced was not meant to interact with the surrounding community. This is absolutely untrue. Parkmerced was surrounded on two sides by nature. There was one church on Brotherhood way. And, there were no buildings at Lake Merced. The University was set very far back from Holliday Dr. in the 50's and presented a natural boundary for the complex. The only interaction with other housing was on 19th Ave. And, the road separated that from the housing across the street. These houses have a long fence dividing them from Parkmerced.

Parkmerced was designed to be integrated with the nature that surrounded it from the Ocean to the blending into the City. The historic landscaping project designed by Thomas Church was meant to weave the people and landscape together in a new and innovative way. The original Parkmerced Landscape is eligible for the Historic National Registry and should be preserved as such. The housing was meant to be affordable for middle class people. There is nothing in S.F. today that allows for that.

The proposed project does not blend with nature. It offers a hard edge to Lake Merced. It limits or cuts off use of local shopping areas with its proposed 300,000 sq. feet of retail space. This high density project belongs downtown where there are other high density buildings. Out by Lake Merced the proposed project would stick out like an eye sore. And, who would want to live and work here with months of cold and fog. As one of the former Parkmerced managers said, "I think the people of this place are made of concrete. I haven't seen the sun for two months. And, it is cold." All this high density may never be fully occupied. And, then what happens? It becomes a slum.

No matter what the developers say there will be a massive increase in traffic at Lake Merced Blvd. and 19th Ave. It is inevitable.

Regarding the proposed landscaping plants: It is not cold enough here for Persimmons to color. And, it is not warm enough here for oleander to flower properly.

Thank you,

Cathy Lentz

32.3

The New York Times

May 28, 2010

Owners Bet on Raising the Rent, and Lost

By CHARLES V. BAGLI

The first signs of financial turmoil came at Riverton Houses in Harlem.

Then came Stuyvesant Town and Peter Cooper Village on Manhattan's East Side.

Now a third complex built by Metropolitan Life in the 1940s for veterans and middle-class families has run into financial distress after being purchased by speculators during the recent real estate boom. The owners of the sprawling Parkmerced apartment complex in San Francisco announced this week that they would default on their \$550 million mortgage, which comes due in October.

A partnership of Laurence Gluck of Stellar Management and the Rockpoint Group, which had already lost Riverton Houses in Harlem in March to foreclosure, put out a statement on Wednesday that placed their problems at the 3,221-unit Parkmerced in the context of the current economic downturn.

"The landscape has changed dramatically," P. J. Johnston, a spokesman for the owners, said in an interview. "The economy has taken a major hit. Many properties are facing default."

But just like Riverton and Stuyvesant Town, the owners of Parkmerced sought to take advantage of a roaring market to replace rent-regulated residents with tenants able to pay far higher rates.

The owners in all three cases invested substantial sums in upgrading the aging buildings and renovating some apartments. But ultimately they failed to increase revenue enough to cover the debt payments on the properties, which were heavily leveraged. The recession did not help.

"It's pretty interesting that they have all ended up in the same place," said Andrew Florio, an analyst at Real Capital Analytics, a research firm. "People assumed they could boost revenues by kicking people out and raising rents."

Stellar told the more than 6,000 tenants at Parkmerced, which is spread over 115 acres on the south side of San Francisco, that life would go on as usual. They said they were negotiating with lenders, which include Deutsche Bank, to restructure their debt and would continue with their \$1.2 billion expansion proposal to nearly triple the number of apartments at Parkmerced.

"Phone calls will be answered and issues addressed, our maintenance team will respond to work orders, and the leasing team will continue to lease new apartments," Seth Mallen, an executive vice president for Stellar, said in a statement.

But so far, lenders have been reluctant to acknowledge the losses and restructure deals that were struck during the boom. And analysts say it remains difficult for owners to refinance large properties at anywhere near the old terms. As Stellar points out, they are not alone; more than \$150 billion in commercial loans like theirs have been transferred to special servicers who handle troubled debts.

There is \$550 million in senior debt on Parkmerced and an additional \$52 million in secondary loans, according to the owners, but it is not as heavily leveraged as Riverton or Stuyvesant Town and Peter Cooper Village. The default was bad news for the giant California public employees pension fund, Calpers, which invested in all three properties. Calpers has already written off a \$500 million investment in Stuyvesant Town.

Stellar and Rockpoint were forced to give up Riverton Houses after defaulting on \$250 million in loans. And Stuyvesant Town and Peter Cooper, which had been bought by Tishman Speyer Properties and BlackRock Realty for \$5.4 billion in 2006, is in foreclosure.

All three deals had prompted an outcry from tenant advocates who bemoaned the loss of housing affordable to working and middle-class families.

"The Bay Area, like New York City, continues to be one of the least affordable real estate markets in the country," said Christopher Lund, a spokesman for the East Palo Alto Fair Rent Coalition. "The Parkmerced is the largest multifamily complex in San Francisco and its 3,200 rent-stabilized units are a key part of the Bay Area's remaining affordable housing stock."

MetLife built Parkmerced, Stuyvesant Town, Riverton and a handful of other large complexes in the 1940s amid a national housing crisis

Letter 32

in a remarkable effort to provide homes for returning veterans. At Stuyvesant Town, for instance, the company received special property tax exemptions in return for agreeing to build the complex, maintaining relatively low rents and limiting its annual profit to 6 percent.

At the start of the real estate boom in 2004, private equity firms began buying these kind of meat-and-potato complexes, which they had long eschewed in favor of luxury buildings.

In 2005, Mr. Gluck and Rockpoint bought Riverton, a middle-class complex where more than 90 percent of the 1,200 apartments were rent-regulated. A year later, Mr. Gluck refinanced his debt with \$250 million in loans, allowing him to modernize the lobbies, install new elevators and glass doors, landscape the center courtyard and pocket tens of millions in profit.

Rents covered less than a third of the monthly debt payments. Mr. Gluck had estimated he could raise income substantially by converting half the apartments to market rates by December 2011. But by the time he neared default in August 2008, he had converted only 128. The lenders took back the complex at a foreclosure sale earlier this year.

Tishman Speyer and its partner bought Stuyvesant Town and Peter Cooper Village — 110 buildings with 11,227 apartments on 80 acres — from MetLife in 2006, the largest deal ever for a single property. Their business plan was essentially the same as that of Stellar Management.

And like Stellar, they failed to replace rent-regulated residents with tenants willing to pay higher, market rents as rapidly as projected. The partners exhausted \$890 million in reserve funds earlier this year. Lenders are now foreclosing on the property, whose value is estimated at about \$1.9 billion.

Stellar and Rockpoint bought Parkmerced the same year they acquired Riverton.

MetLife built the complex between 1944 and 1952. It consists of 11 13-story buildings with 1,683 apartments and 1,538 two-story townhouses. Its original 206 acres are bound by San Francisco State University on the north, San Francisco Golf Club on the south and Lake Merced to the west.

MetLife sold the property to the real estate mogul Harry B. Helmsley for \$40 million in 1970, two years after he acquired the Parkchester, another MetLife complex in the Bronx with 12,271 apartments, for \$90 million.

Parkmerced entered a period of slow decline as Mr. Helmsley and a subsequent owner deferred maintenance and sold small parcels to San Francisco State, according to tenants and the current owners. Increasing numbers of students from San Francisco State have replaced families at the complex.

Stellar bought the property in 2005 for \$700 million and promptly announced a renovation program, spending, it says, \$135 million on new elevators and sprinklers, renovating lobbies and upgrading vacant apartments with new kitchen cabinets and countertops. The units on the upper floors of the towers are now called “penthouses” and require special entry keys.

“Stellar Management is probably the best manager we’ve lived under,” said Dorothy Lefkowitz, who has lived with her husband Martin at Parkmerced for 15 years. But some residents and tenant activists worry that Parkmerced rents will swell beyond the reach of the people for whom it was originally built.

There are also mixed reviews of Stellar’s proposal, now under review by the city, to demolish the 1,538 townhouses to make way for up to 7,400 new apartments over 20 years. It is part of an plan to create a dense, environmentally sustainable community based on public transportation and wind turbines.

In the meantime, Stellar’s lenders were forced to pay a \$6 million tax bill last year when Stellar and its partner could not come up with the money, according to Realpoint, a debt rating agency. And rents in San Francisco have fallen by 8 percent or more, while vacancies are up at Parkmerced.

Parkmerced in Default: What Now for Owners' Plan to Bulldoze Over 1,500 Rent-Controlled Homes?

by Dean Preston, 2010-06-01

The owners of San Francisco's Parkmerced cannot pay their mortgage, yet they want permission from the city to demolish more than 1,500 rent controlled homes. While most of the public discussion about the proposed development project has been about environmental, transit and preservation issues, the planned demolition of so many rent-controlled housing units is reason alone to stop this project.

Parkmerced was built by the Metropolitan Life Insurance Company (MetLife) after World War II. Met Life also built similar complexes in New York City (The Riverton Houses, Stuyvesant Town and Peter Cooper Village) and other large U.S. cities. For decades, these developments have provided stable housing for middle-class renters in increasingly expensive urban real estate markets.

In 2005, a partnership of Stellar Management and Rockpoint Group purchased Parkmerced and The Riverton. The complexes were purchased for sums that could not be justified by the existing rental income on the properties. Instead, as noted in a *New York Times* [piece this weekend](#): "just like Riverton and Stuyvesant Town, the owners of Parkmerced sought to take advantage of a roaring market to replace rent-regulated residents with tenants able to pay far higher rates."

These "predatory equity" schemes have not been working out as investors intended. Tishman Speyer (Stuyvesant Town), Stellar Management (Riverton), Page Mill Properties (East Palo Alto), and others wound up in foreclosure, with banks, [pension funds](#) and other institutional investors losing the funds invested in these reckless schemes.

Parkmerced is not far behind these other properties on the road to foreclosure. The latest news is that the owners [are in default](#) on their loans. Former Willie Brown spokesman P.J. Johnston, now working for Stellar Management, sought to reassure the community that the default would not change life at Parkmerced. According to Johnston, the owners remain committed to moving forward with their development plans.

Those plans call for the demolition of over 1500 "garden apartments," all of which are subject to San Francisco's rent control law. The owners argue that they will replace these units with over 5000 new housing units on the site at a rate of 300 per year. (It is unclear how many of these anticipated units would be *rental* units. The owners admitted at a recent Planning Commission hearing that the mix of rentals to owned units "has not been finalized.") They claim that they will replace the rent-controlled units with new rent-controlled units.

The promise to replace the demolished rent-controlled housing with rent-controlled housing cannot be taken at face value. First, given the owners' current financial situation, there is no assurance that they would be able to perform on such a promise. In a worst-case scenario, one that seems entirely possible, rent controlled homes would be bulldozed and then the project abandoned – in whole or in part – when it came time to build the replacement units.

Second, the City must remember that this ownership group's business model involves the deregulation of rent-controlled units. At minimum, the city should demand and examine placement memoranda, investment agreements and other documents that the owners provided to potential investors. Similar documents in other predatory equity deals reveal the intent to displace tenants and raise rents despite local tenant protection laws.

Third, now that California's Court of Appeal has expanded the Costa-Hawkins Rental Housing Act to bar most rent-restrictions on new housing, proposed rent restrictions on replacement housing would likely be challenged in court by the owners, or subsequent owners, of Parkmerced. While Costa Hawkins recognizes a limited exception for certain types of development agreements, the 2009 *Palmer v. Sixth Street* court decision shows that cities cannot rely on the Courts to interpret Costa Hawkins to allow rent-restrictions on new housing. Until state law changes so that the city can guarantee its residents that replacement units will be rent-regulated, the City should not even consider allowing such a large-scale demolition of rent-controlled housing units.

Finally, let's not forget that San Francisco has a [policy against demolishing](#) sound rent-controlled housing. The City's [Planning Code](#) makes this clear. The City's Planning Department reiterates the point: "Under requirements of the General Plan, the Department is predisposed to discourage the demolition of sound housing."

Given the precarious financial position of the owners, the uncertainties regarding rent-restrictions on replacement housing and the city's policy to discourage the demolition of sound housing, it is hard to imagine that any responsible city official would approve moving forward with a plan to demolish over 1500 rent-controlled homes at Parkmerced.

Dean Preston is the executive director of Tenants Together, California's Statewide Organization for Renters' Rights. For more information about Tenants Together, go to www.tenantsaltogether.org

The New York Times

May 28, 2010

Owners Bet on Raising the Rent, and Lost

By CHARLES V. BAGLI

The first signs of financial turmoil came at Riverton Houses in Harlem.

Then came Stuyvesant Town and Peter Cooper Village on Manhattan's East Side.

Now a third complex built by Metropolitan Life in the 1940s for veterans and middle-class families has run into financial distress after being purchased by speculators during the recent real estate boom. The owners of the sprawling Parkmerced apartment complex in San Francisco announced this week that they would default on their \$550 million mortgage, which comes due in October.

A partnership of Laurence Gluck of Stellar Management and the Rockpoint Group, which had already lost Riverton Houses in Harlem in March to foreclosure, put out a statement on Wednesday that placed their problems at the 3,221-unit Parkmerced in the context of the current economic downturn.

"The landscape has changed dramatically," P. J. Johnston, a spokesman for the owners, said in an interview. "The economy has taken a major hit. Many properties are facing default."

But just like Riverton and Stuyvesant Town, the owners of Parkmerced sought to take advantage of a roaring market to replace rent-regulated residents with tenants able to pay far higher rates.

The owners in all three cases invested substantial sums in upgrading the aging buildings and renovating some apartments. But ultimately they failed to increase revenue enough to cover the debt payments on the properties, which were heavily leveraged. The recession did not help.

"It's pretty interesting that they have all ended up in the same place," said Andrew Florio, an analyst at Real Capital Analytics, a research firm. "People assumed they could boost revenues by kicking people out and raising rents."

Stellar told the more than 6,000 tenants at Parkmerced, which is spread over 115 acres on the south side of San Francisco, that life would go on as usual. They said they were negotiating with lenders, which include Deutsche Bank, to restructure their debt and would continue with their \$1.2 billion expansion proposal to nearly triple the number of apartments at Parkmerced.

"Phone calls will be answered and issues addressed, our maintenance team will respond to work orders, and the leasing team will continue to lease new apartments," Seth Mallen, an executive vice president for Stellar, said in a statement.

But so far, lenders have been reluctant to acknowledge the losses and restructure deals that were struck during the boom. And analysts say it remains difficult for owners to refinance large properties at anywhere near the old terms. As Stellar points out, they are not alone; more than \$150 billion in commercial loans like theirs have been transferred to special servicers who handle troubled debts.

There is \$550 million in senior debt on Parkmerced and an additional \$52 million in secondary loans, according to the owners, but it is not as heavily leveraged as Riverton or Stuyvesant Town and Peter Cooper Village. The default was bad news for the giant California public employees pension fund, Calpers, which invested in all three properties. Calpers has already written off a \$500 million investment in Stuyvesant Town.

Stellar and Rockpoint were forced to give up Riverton Houses after defaulting on \$250 million in loans. And Stuyvesant Town and Peter Cooper, which had been bought by Tishman Speyer Properties and BlackRock Realty for \$5.4 billion in 2006, is in foreclosure.

All three deals had prompted an outcry from tenant advocates who bemoaned the loss of housing affordable to working and middle-class families.

"The Bay Area, like New York City, continues to be one of the least affordable real estate markets in the country," said Christopher Lund, a spokesman for the East Palo Alto Fair Rent Coalition. "The Parkmerced is the largest multifamily complex in San Francisco and its 3,200 rent-stabilized units are a key part of the Bay Area's remaining affordable housing stock."

MetLife built Parkmerced, Stuyvesant Town, Riverton and a handful of other large complexes in the 1940s amid a national housing crisis

Letter 32

in a remarkable effort to provide homes for returning veterans. At Stuyvesant Town, for instance, the company received special property tax exemptions in return for agreeing to build the complex, maintaining relatively low rents and limiting its annual profit to 6 percent.

At the start of the real estate boom in 2004, private equity firms began buying these kind of meat-and-potato complexes, which they had long eschewed in favor of luxury buildings.

In 2005, Mr. Gluck and Rockpoint bought Riverton, a middle-class complex where more than 90 percent of the 1,200 apartments were rent-regulated. A year later, Mr. Gluck refinanced his debt with \$250 million in loans, allowing him to modernize the lobbies, install new elevators and glass doors, landscape the center courtyard and pocket tens of millions in profit.

Rents covered less than a third of the monthly debt payments. Mr. Gluck had estimated he could raise income substantially by converting half the apartments to market rates by December 2011. But by the time he neared default in August 2008, he had converted only 128. The lenders took back the complex at a foreclosure sale earlier this year.

Tishman Speyer and its partner bought Stuyvesant Town and Peter Cooper Village — 110 buildings with 11,227 apartments on 80 acres — from MetLife in 2006, the largest deal ever for a single property. Their business plan was essentially the same as that of Stellar Management.

And like Stellar, they failed to replace rent-regulated residents with tenants willing to pay higher, market rents as rapidly as projected. The partners exhausted \$890 million in reserve funds earlier this year. Lenders are now foreclosing on the property, whose value is estimated at about \$1.9 billion.

Stellar and Rockpoint bought Parkmerced the same year they acquired Riverton.

MetLife built the complex between 1944 and 1952. It consists of 11 13-story buildings with 1,683 apartments and 1,538 two-story townhouses. Its original 206 acres are bound by San Francisco State University on the north, San Francisco Golf Club on the south and Lake Merced to the west.

MetLife sold the property to the real estate mogul Harry B. Helmsley for \$40 million in 1970, two years after he acquired the Parkchester, another MetLife complex in the Bronx with 12,271 apartments, for \$90 million.

Parkmerced entered a period of slow decline as Mr. Helmsley and a subsequent owner deferred maintenance and sold small parcels to San Francisco State, according to tenants and the current owners. Increasing numbers of students from San Francisco State have replaced families at the complex.

Stellar bought the property in 2005 for \$700 million and promptly announced a renovation program, spending, it says, \$135 million on new elevators and sprinklers, renovating lobbies and upgrading vacant apartments with new kitchen cabinets and countertops. The units on the upper floors of the towers are now called "penthouses" and require special entry keys.

"Stellar Management is probably the best manager we've lived under," said Dorothy Leftkovits, who has lived with her husband Martin at Parkmerced for 15 years. But some residents and tenant activists worry that Parkmerced rents will swell beyond the reach of the people for whom it was originally built.

There are also mixed reviews of Stellar's proposal, now under review by the city, to demolish the 1,538 townhouses to make way for up to 7,400 new apartments over 20 years. It is part of a plan to create a dense, environmentally sustainable community based on public transportation and wind turbines.

In the meantime, Stellar's lenders were forced to pay a \$6 million tax bill last year when Stellar and its partner could not come up with the money, according to Realpoint, a debt rating agency. And rents in San Francisco have fallen by 8 percent or more, while vacancies are up at Parkmerced.

Parkmerced in Default: What Now for Owners' Plan to Bulldoze Over 1,500 Rent-Controlled Homes?

by Dean Preston, 2010-06-01

The owners of San Francisco's Parkmerced cannot pay their mortgage, yet they want permission from the city to demolish more than 1,500 rent controlled homes. While most of the public discussion about the proposed development project has been about environmental, transit and preservation issues, the planned demolition of so many rent-controlled housing units is reason alone to stop this project.

Parkmerced was built by the Metropolitan Life Insurance Company (MetLife) after World War II. Met Life also built similar complexes in New York City (The Riverton Houses, Stuyvesant Town and Peter Cooper Village) and other large U.S. cities. For decades, these developments have provided stable housing for middle-class renters in increasingly expensive urban real estate markets.

In 2005, a partnership of Stellar Management and Rockpoint Group purchased Parkmerced and The Riverton. The complexes were purchased for sums that could not be justified by the existing rental income on the properties. Instead, as noted in a *New York Times* [piece this weekend](#): "just like Riverton and Stuyvesant Town, the owners of Parkmerced sought to take advantage of a roaring market to replace rent-regulated residents with tenants able to pay far higher rates."

These "predatory equity" schemes have not been working out as investors intended. Tishman Speyer (Stuyvesant Town), Stellar Management (Riverton), Page Mill Properties (East Palo Alto), and others wound up in foreclosure, with banks, [pension funds](#) and other institutional investors losing the funds invested in these reckless schemes.

Parkmerced is not far behind these other properties on the road to foreclosure. The latest news is that the owners [are in default](#) on their loans. Former Willie Brown spokesman P.J. Johnston, now working for Stellar Management, sought to reassure the community that the default would not change life at Parkmerced. According to Johnston, the owners remain committed to moving forward with their development plans.

Those plans calls for the demolition of over 1500 "garden apartments," all of which are subject to San Francisco's rent control law. The owners argue that they will replace these units with over 5000 new housing units on the site at a rate of 300 per year. (It is unclear how many of these anticipated units would be *rental* units. The owners admitted at a recent Planning Commission hearing that the mix of rentals to owned units "has not been finalized.") They claim that they will replace the rent-controlled units with new rent-controlled units.

The promise to replace the demolished rent-controlled housing with rent-controlled housing cannot be taken at face value. First, given the owners' current financial situation, there is no assurance that they would be able to perform on such a promise. In a worst-case scenario, one that seems entirely possible, rent controlled homes would be bulldozed and then the project abandoned -- in whole or in part -- when it came time to build the replacement units.

Second, the City must remember that this ownership group's business model involves the deregulation of rent-controlled units. At minimum, the city should demand and examine placement memoranda, investment agreements and other documents that the owners provided to potential investors. Similar documents in other predatory equity deals reveal the intent to displace tenants and raise rents despite local tenant protection laws.

Third, now that California's Court of Appeal has expanded the Costa-Hawkins Rental Housing Act to bar most rent-restrictions on new housing, proposed rent restrictions on replacement housing would likely be challenged in court by the owners, or subsequent owners, of Parkmerced. While Costa Hawkins recognizes a limited exception for certain types of development agreements, the 2009 [Palmer v. Sixth Street](#) court decision shows that cities cannot rely on the Courts to interpret Costa Hawkins to allow rent-restrictions on new housing. Until state law changes so that the city can guarantee its residents that replacement units will be rent-regulated, the City should not even consider allowing such a large-scale demolition of rent-controlled housing units.

Finally, let's not forget that San Francisco has a [policy against demolishing](#) sound rent-controlled housing. The City's [Planning Code](#) makes this clear. The City's Planning Department reiterates the point: "Under requirements of the General Plan, the Department is predisposed to discourage the demolition of sound housing."

Given the precarious financial position of the owners, the uncertainties regarding rent-restrictions on replacement housing and the city's policy to discourage the demolition of sound housing, it is hard to imagine that any responsible city official would approve moving forward with a plan to demolish over 1500 rent-controlled homes at Parkmerced.

Dean Preston is the executive director of Tenants Together, California's Statewide Organization for Renters' Rights. For more information about Tenants Together, go to www.tenants-together.org

RESPONSES TO LETTER 32

Cathy Lentz, June 17, 2010

Response 32.1

This comment expresses general opposition to the Proposed Project, and expresses a concern about the impacts of windmills on birds. Comments of general support or opposition to the Proposed Project may be considered by decision-makers as part of their decision to approve or disapprove the Project. Please refer to Response 45.11 regarding potential impacts of wind turbines on birds.

Response 32.2

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project, citing recent financial media coverage of the Project Sponsor. Please see Response TR.1.2, in Section III.B, Public Hearing Comments and Responses.

Response 32.3

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy or the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

RECEIVED AT THE OFFICE OF THE CLERK

6-17-10

08.0021E
(R. COOPER)

To: The Members of the San Francisco Planning Commission

From: Denis J. Norrington

Re: Parkmerced Plans to tear down garden apartments. Specific reference to Block #4

Statement:

I am the longest term tenant in Park Merced. I have lived at my current address, 106 Crespí Dr., since 1957 when I moved there with my parents. Prior to that I lived for eleven years at 12 Fuente. My tenancy in Park Merced which goes back 64 years, is the longest of any of the 4,500+ residents. I am currently 69 years old

According to the plan being debated, Park Merced is planning to tear down the ~~the~~ garden apartments on my block to put up a shopping center. This is a total waste of precious S.F. land and resources and will displace tenants needlessly. Follow:

33.1

Within a one to one and a half mile radius of Block 4 (and most other P.M. blocks) there are SEVEN major shopping centers which are:

- 1) The current Parkmerced shopping complex two blocks away on Cambon drive
- 2) The shops and malls at nearby San Francisco State University campus.
- 3) The large and extensive and famous Stonestown Galleria
- 4) The Lakeside shopping center on Ocean Ave. between 14th Ave. + Junipero Serra Blvd.
- 5) The West Portal shopping area, 4 blocks long on

33.2

West Portal Ave.

- 6) The Lakeshore Shopping Center on Sloat Blvd near Sunset Blvd., featuring, among other stores, a newly enlarged Lucky Supermarket
- 7) I work for the S.F. Chronicle as Asst Supervisor for Home Delivery in the Daly City Area. Recently a huge new expansion of the Westlake Shopping Center at John Daly Blvd and Lake Merced Blvd. has been completed which includes two new huge 6 story parking garages

33.2
con't

Any shopping center built on Block 4 would have zero chance of surviving economically given the above nearby competition

I also wish to state as follows

1) I am a former member of the Parkmerced Residents Organization's Board of Directors having served in that capacity for 5 yrs from 2002-2007

2) Many of the other residents of Block 4 are also long term tenants. Block 4 ~~may~~ may have the highest % of long term tenants in Park Merced. One tenant at 10 Juan Batista has lived there 30+ year. Another at 112 Crespi, 20+ years. etc

3) I also oppose the construction of additional high rise apartments where current garden apartments are due to severe earthquake potential damage. During the Loma Prieta quake ^{some of the} the current towers came close to current collapse and were severely damaged. And this quake was not centered on the nearby San Andreas fault which was the source of the

33.3

Denis Harrington

③ of ③ Letter 33

1906 earthquakes. These would be the ONLY
other high rise apartments or buildings ~~west~~ in
Western San Francisco west of Twin Peaks

33.3
con't

Denis J. Harrington

106 Crespi Dr.

San Francisco, Ca. 94132

415-731-6556; 415-731-1842

415-405-6286

freedomman1 @ SBCglobal.net

RESPONSES TO LETTER 33

Denis J. Norrington, June 17, 2010

Response 33.1

The comment expresses opposition to the Proposed Project, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

The comment also states that residents will be needlessly displaced as a result of the Proposed Project. Please see Response TR.2.2, in Section III.B, Public Hearing Comments and Responses, for a discussion of this issue.

Response 33.2

The comment states that the proposed retail uses on Crespi Drive will not survive due to competition from existing commercial uses within a 1.5-mile radius. This comment does not address the adequacy or accuracy of the EIR. Pursuant to Section 15131(a) of the *CEQA Guidelines*, “economic or social effects shall not be treated as significant effects on the environment.” The viability of the proposed retail uses on Crespi Drive is an economic issue that would not be considered a physical environmental effect of the Proposed Project. Whether the proposed retail uses on Crespi Drive should be approved as part of the Proposed Project is an issue that may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response 33.3

The comment asserts that new high-rise towers should not be constructed on the Project Site due to its proximity to the San Andreas fault. Please see Master Response A.3, Seismic Hazards, in Section III.A, Master Responses.

My name is Daniel Phillips. I am currently President of The Board of Directors of The Parkmerced Residents' Organization. While the organization's official stance is still to oppose Parkmerced Vision I question the research being done by the board members. I took three copies of the Draft EIR to our most recent board meeting of May 22, 2010, and not one voting board member accepted a copy to study. It is beyond my comprehension that any uninformed decision on the Draft EIR can be made.

When I first moved here in April of 1987 I was struck by the cookie cutter, utilitarian look of the place, but when I began to walk the original 150 acres I discovered how there was great variety in the trim and doorways of Parkmerced. The interior courtyards varied from magnificent areas with curvilinear patios to drab unimaginative places. However, I can no longer visit these places. They are not ADA accessible, and even in 1987 they seemed hidden and private.

I believe we must go beyond the emotional and nostalgic response and look at hard facts. One of the greatest complaints by non-tower residents concern townhouse conditions. Some have hired experts to inspect their homes. The solution consistently seems to re-build the unit. This weakens any argument for non-development.

The actions of a few militants are embarrassing. I am sure you have all received rational communications, but the current comfort zone can, and should be improved. The overall benefits of Parkmerced's Vision plan outweighs weak, and uninformed arguments. The eventual savings in resources alone call for redevelopment. With Parkmerced Vision we will have a brighter future.

34.1

Daniel W. Phillips

RECEIVED AT CPC HEARING 6-17-10
2008, 002112
PARK MERCED
(R. COOPER)

RESPONSES TO LETTER 34

Daniel W. Phillips, June 17, 2010

Response 34.1

This comment expresses general support for the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Letter 35

*Re: State Clearinghouse No.
2009051073
Parkmerced EIR*

RECEIVED

JUN 25 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Robin Horner
234 Garces Drive
San Francisco, CA 94132

June 23, 2010

Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Ste. 400
San Francisco, CA 94103

Dear Mr. Wycko:

I have lived in Parkmerced for the past 14 years. When owners and managers simply take care of problems and keep the place up, it is a good place to live, in terms of decent living conditions, affordability (thanks to reasonable rents compared with the rest of the city when we moved in and rent control today), convenience, natural beauty, and the kind of neighborly community that occurs over time when renters who have been wisely selected live near each other.

The current owners would like to dramatically alter the property. Their proposed plans would change Parkmerced so much as to destroy its current assets for those of us who live here. Moreover, one wonders, with frequent long-term apartment vacancies here now, a situation which did not exist under the landlord of the property when I moved in 14 years ago, how the landlord expects to fill and make money off of all the proposed new units. I realize that the landlord has defaulted on property loans, so all future plans may be on hold, but just in case they are not, I would like to give my input.

There are several items in the Environmental Impact Report (EIR), and a couple not even mentioned there, that raise serious concerns about the viability and wisdom of approving any version of the landlord's plans for the property. My purpose here is simply to call them to your attention, so I'll try to be succinct:

According to the EIR, there are no feasible mitigation measures available for the following:

V.B. Aesthetics

- AE-1: Visual/scenic resource – The demolition of the garden apartments to construct highrises would dramatically change for the worse the visual and physical (i.e. population density/feeling of crowding) experience of living in Parkmerced.

V.E. Transportation and Circulation

- TR-9: Traffic impacts at two freeway segments – Regarding the proposed changes to traffic and public transportation lines due to the plans, we are told that “Traffic impacts at this facility under the Project conditions would remain significant and unavoidable.”

V.F. Noise

- NO-3: Project-related traffic would increase noise levels and NO-3: Increases in traffic from the project would result in cumulative noise increases – Past construction work on the property was stressful every day. This project promises to be even more detrimental to the health and well-being of residents.

V.H. Air Quality

- AQ-4: Project operations could affect regional air quality and AQ-9: Cumulative air quality impacts – This is a distressing issue about which to have “no feasible mitigation measure.”

While the EIR claims to have solutions for the following issues, I am not convinced:

V.E. Transportation and Circulation

- TR-1: Realigning light rail tracks to come through Parkmerced – The disruptions in terms of the M-Oceanview line being a longer route (leading to more delays than already occur), in terms of the noise of a light rail vehicle running through the property, and in terms of the construction noise would be tremendous. The fact that the EIR explains elsewhere (NO-5) that the “rail grinding and replacement is normally performed every 3-5 years” adds to this fact. The re-routing of the light rail line alone would make living in Parkmerced a noisy, disruptive, nerve-wracking experience day and night. } 35.1
- TR-5: Traffic impacts on 19th Avenue – The proposal to add a toll lane on 19th Avenue makes no sense whatsoever as a way to reduce traffic impact. This would slow traffic significantly, as drivers jockey to get into the appropriate lane. } 35.2
- TR-23: Removing mixed-flow traffic from lanes of 19th Avenue – The impact of moving all passenger vehicle traffic out of certain lanes for the section between Holloway and Winston would lead to permanent traffic delays and confusion. } 35.3

V.F. Noise

- NO-1: Project-related construction activities would increase noise levels – Even with the mitigations proposed, I doubt that the noise levels would be bearable. Early in this landlord’s tenure of the property, a water pipe replacement project caused enough disruption and made enough noise that the healthy among us suffered daily stress and the elderly and infirm suffered actual health problems. I would hate to go through anything like that again, and this project seems exponentially greater in scope in every way. } 35.4

Several mitigations come with the caveat that "implementation of these measures cannot be assured until...approval by Caltrans." or that something must be done by the SFMTA, such as the purchase and operation of additional light rail vehicles. Given that the state of California and the city of San Francisco both have tremendous budget shortfalls, the approval, completion, and adequate implementation of such measure seem dubious, at best.

35.5

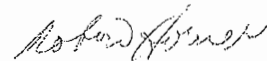
At least as important as each of the above items to many of us who have lived here for several years is this:

There are residents who have been here for 5 years, 10 years, raised families, and even grown up here, themselves. In my block, many of us know each other, look out for each other, and would help each other with small things if needed. This kind of community is important enough and positive enough to be a reason to live here. The fact that we rent rather than own our homes does not mitigate the value of the communities residents throughout Parkmerced have formed. Even if the landlord moves us to other apartments (and I actually have not seen anything formal guaranteeing that the rent at those apartments would start out equal to the rent we currently pay), the act of splitting up the small communities that have formed around the garden apartment blocks, subjecting us to years of demolition and construction, and more than quadrupling the population here, would greatly reduce our quality of life and would take away something that should not be taken for granted in any city.

35.6

I urge you to reject all aspects of the proposed project at Parkmerced. It is bad for the thousands of us who live here and bad for San Francisco.

Sincerely,



Robin Horner

RESPONSES TO LETTER 35

Robin Horner, June 23, 2010

Response 35.1

The comment states that rerouting the light rail through the Project Site would be disruptive. Please see Response 29.7 for a discussion of the noise effects of the light rail realignment.

Response 35.2

The comment states that the proposed HOT lane would not reduce traffic impacts and would ultimately slow travel time. Please refer to Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for discussion of the benefits and operational characteristics of the proposed HOT lane.

Response 35.3

The comment states that removing all passenger vehicle traffic from lanes on 19th Avenue to create transit-only lanes would lead to permanent traffic delays and confusion. This is consistent with the findings and analysis in the EIR, which generally show that study intersections that would include a HOT lane would have higher average vehicular delay than under conditions with the Proposed Project and no HOT lane. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR.

Response 35.4

The comment expresses concerns about the effects of construction noise on residents. The adverse health effects that can be caused by excessive noise are summarized in the EIR in Section V.F, Noise, p. V.F.3. The elderly and infirm populations are among the “sensitive receptors” to noise impacts listed on p. V.F.11. Information on adverse health effects of each of the construction phases is discussed in Impact NO-1, pp. V.F.17-V.F.18, and the mitigation measures for such impacts are identified on p. V.F.19.

Response 35.5

The comment notes that certain mitigation measures in the Draft EIR have the caveat “implementation of these measures cannot be assured until... approved by Caltrans” and asserts that implementation of such measures cannot be assured given budget shortfalls at the state and local level. Such caveats have been included in the EIR where appropriate to provide an accurate assessment of the potential for mitigations identified in environmental impacts. Where

implementation of a mitigation measure cannot be assured because the measure is not controlled by the Project Sponsor or the City, the EIR describes the environmental effects of the Proposed Project without implementation of such mitigation.

Response 35.6

The comment raises concerns about the displacement of small communities of residents at Parkmerced as a result of implementation of the Proposed Project. The comment also anticipates impacts from demolition and construction activities, as well as negative effects from the anticipated increase in population. Please refer to Response TR.2.2, in Section III.B, Public Hearing Comments and Responses, for a discussion regarding displacement of residents. Construction noise impacts are summarized in the EIR in Section V.E, Noise, pp. V.E.17-V.E.21. Construction air quality impacts are summarized in Section V.G, Air Quality, pp. V.G.19-V.G.26. Please see Response 20.2 for a discussion regarding impacts from increase in population and effects on quality of life.

RECEIVED

JUN 24 2010

June 25, 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

Bill Wycko,
Environmental Review Officer,
San Francisco Planning Department,
1650 Mission Street, Suite 400,
San Francisco, CA 94103

Re: Draft EIR Parkmerced Project, 3711 Nineteenth Avenue

Dear Mr. Wycko,

My name is María Elena Guerrero Engber.

My family and I are long time Parkmerced residents. I have lived in one of the towers, on building No. 40 at 310 Arballo Drive, Apartment No.11 D, since July 1993, for the last seventeen years to present date.

I am writing this letter to express **my total opposition** to the City and County of San Francisco Planning Department, Draft Environmental Impact Report for Parkmerced Project, located at 3711 Nineteenth Avenue, San Francisco, CA 94132.
Planning Department Case No. 2008.0021E.
State Clearinghouse No. 2009052073.
Publication Date May 12, 2010.

My reasons to oppose the Parkmerced Project are so many, that I will only be able to mention a few here.

According to the Draft EIR, Parkmerced has 3,221 units, with 1,683 units in eleven towers and 170 two-story buildings with 1,538 units that if the Project is approved will be demolished in a period of twenty to thirty years. At the end of the Project there will be 8,900 units, an increase in density of 5,679 units.

I do not think Parkmerced will be able to absorb such an increase in population and extra parking that will be needed, (one parking space per unit). The present parking situation is impossible now, with the students of SFSU utilizing most of the available street parking. Besides, in accordance with the present regulations initiated in year 2000 by the previous owners, pets are allowed in Parkmerced units, so we are talking here of an increase in the pet population of 5,679 more pets, (one pet per every new unit), that will be allowed to live with the tenants.

The 1,683 units from the eleven tower apartments will remain subject to rent control. The 1,538 new units that will be built, will also be considered as rent control units by the present owners who have stated in writing that the residents of the two story town-homes with rent control status will keep their status when moving to their new units.

36.1

36.2

June 25, 2010
Public comments on Parkmerced EIR Draft

At the Planning Commission Hearing of June 17, 2010, some members of the public presented valid arguments concerning the decision of the owners to treat the new units as rent control units and to allow the 1,538 displaced renters to move to the newly built units keeping their rent control status. Some of the speakers argued that this goes against the Rent Control Ordinance in San Francisco, and therefore it will be unenforceable. Another speaker stated that there is legal precedence that the court rejected this argument presented by a landlord in a previous case. The end result is that Parkmerced will be involved in litigation for years to come.

36.2
con't

This Environmental Impact Report has not stressed enough the effects that this Project, if approved will have on the current over 7,260 Parkmerced residents, how will this Project affect our health and quality of life?

36.3

According to the Draft EIR and I quote on: "Volume I, Chapter II. 47, Table II.3: Comparison of Project and Alternative Impacts, if the Full Buildout with Transit Options Alternative is approved, the Impact on:

HISTORIC AND ARCHITECTURAL RESOURCES, TRANSPORTATION, CIRCULATION, NOISE AND AIR QUALITY WILL BE SIGNIFICANT AND UNAVOIDABLE.

THE IMPACT ON WIND WILL BE POTENTIALLY SIGNIFICANT AND UNAVOIDABLE. I BELIEVE THESE TWO CONCLUSIONS TO BE TRUE FACTS.

So how come that on these two other environmental topics, you came to the wrong conclusion:

**LAND USE,
POPULATION AND HOUSING WILL BE LESS THAN SIGNIFICANT IN ALL ALTERNATIVES.**

HOW DID YOU COME UP WITH THIS CONCLUSION? WHAT ARE THE BASIS FOR YOUR REASONING?

36.4

MY OPINION IS THAT YOUR ESTIMATE IS WRONG AS THE IMPACT ON THE ABOVE MENTIONED ALTERNATIVES, WILL BE SIGNIFICANT AND UNAVOIDABLE. (EXCEPT THE NO PROJECT ALTERNATIVE WHERE THERE WILL BE NO IMPACT, THIS IS THE ONLY ALTERNATIVE ACCEPTABLE TO ME).

June 25, 2010
Public comments on Parkmerced EIR Draft

This is what I think on:

Land Use: The use of the land will be modified and replaced with cement and buildings, the gardens, the trees, the habitat of the birds nesting on those trees, the plants and shrubbery as well as the meadows will disappear, gone and the peace and quiet that we all enjoy at Parkmerced will be replaced by the constant noise and vibration of the Muni trains and by the considerable increase in noise level in general. **How can you say that the impact on all alternatives will be less than significant.**

36.5

Population and Housing: Parkmerced population will be increased three times, housing density will be incremented by 5,679 more units. **And you still say that the impact will be less than significant.**

36.6

Please re-think your estimate on these items, give us alternatives reflecting the real impact on the site of the Project concerning "Land Use and Population and Housing".

On Volume 1 Chapter V, Page VG-24 of the Parkmerced EIR, I quote:
"Impact AQ-3 Construction of the Proposed Project could expose persons to substantial levels of toxic air contaminants, which may lead to adverse health effects. (Significant and Unavoidable). (Criteria G.b, G.d)". I believe this conclusion to be a true fact.

I am convinced that if this Project is approved, and I decide to stay for the duration, it will cause me to get sick by the pollution, noise and air contamination produced by the constant demolition and construction activities around my home for years to come. According to Phase No. 1 of this EIR Project, on Volume 1 - Chapter VII.7, from 2010 to 2015 there are six other buildings that will be built around building No. 40 where I live.

36.7

Another concern that has not been sufficiently addressed on this EIR is how the significant asbestos problem is going to be dealt with by the City and by the present or future Owners of Parkmerced.

If 1,538 units of the 170 two-story buildings are demolished, even in four phases, what is the amount of asbestos contained on these constructions that will be released into the air and how are the parties involved going to prevent that the cancer causing asbestos particles remain suspended in the air? How will they avoid that the thousands of old and new Parkmerced residents and staff, as well as young students, teachers and staff at next door SFSU, get sick with lung cancer caused by asbestos exposure? How many contractors will be needed to remove the asbestos safely in so many units at once? What about the financial cost of such an undertaking? Are there enough asbestos contractors in San Francisco for a project of this magnitude? There are too many questions that remain unanswered and issues that this EIR has failed to address.

36.8

June 25, 2010
Public comments on Parkmerced EIR Draft

What about the legal implications if people start to get not only sick by the asbestos and other air pollutants, but deaf by the constant construction, demolition and traffic noise around their homes that according to the EIR may last for decades?

36.8
con't

Is the City of San Francisco, the Planning Department and the Sponsor of the Project prepared for such an eventuality?

According to a publication in the Chronicle and to public comments on the Hearing of June 17, 2010 is public knowledge that the present Parkmerced owners are in default on their loan due in October 2010. On May 25, 2010, I received an e-mail from Parkmerced notifying me that a special servicer had been engaged to support the payments of the loan on the property.

How are the Owners planning to come up with the 1.3 billion dollars to finance the plan they presented, to triple the number of homes at Parkmerced, where is the money needed to finance a Project of this magnitude going to come from if they cannot meet their present financial obligations with their lenders? Who will want to lend them money for this Project now when the asset value has fallen considerably?

36.9

What will happen to the Project if Parkmerced goes to the auction block, if the debt cannot be restructured by the present owners? In this scenario will the new owners want to continue with such an undertaking? Even if the entitlements follow the property and not the owners, who will want to buy the complex under those terms? Will Parkmerced remain in limbo?

I do not see in reality, how can they continue to proceed with their Project, if in the near future is possible that Parkmerced will be auctioned and sold to the best bidder.

If there are so many empty units at Parkmerced now, due to the high rents for newly occupied units, what will happen if another 5,679 units are built? No working class person or student can afford to rent in San Francisco at the present market value.

36.10

I have resided in San Francisco since 1981, and I am a tax payer. I have lived at Parkmerced most of that time. I hope that you will think of your own families when you decide about this Project.

I would like to know how the SFSU Master Plan comes into play in this Project, which involves purchasing over 1,000 units of rent control housing. The only units available that will remain subject to rent control will be the 1,638 apartments located on the eleven towers. Where will these 1,000 rent control units be coming from? I hope not at the expense of the tenants on the eleven towers. I am one of those tenants.

36.11

June 25, 2010
Public comments on Parkmerced EIR Draft

Please ask yourselves how would you like to live in a massive construction and demolition site for the next twenty to thirty years? Would you expose your own families to asbestos and other cancer causing substances produced by air pollution and to constant and excessive traffic and construction noise?

36.12

For me the approval of this Project will mean that if I stay I will have to live under these harsh conditions for the rest of my life.

Why do the Present owners of Parkmerced and the San Francisco Planning Department, want to destroy the beautiful Avenues at Parkmerced by changing the Muni route and building rails and a train that will cause so much destruction, noise and pollution in our peaceful Avenues and Streets at Parkmerced, when public transportation is already in place and available by Muni at Holloway and 19th Avenue and by the No. 17 bus inside Parkmerced. They do not live here, they will not have to deal with the consequences of their actions. We, the present and future residents will have to pay the price of this folly, if such an ill advised Project, that has not even been financed is approved.

36.13

What will happen to the gardens, trees, flowers, parks, meadows and shrubbery that will disappear to give place to blocks and blocks of cement instead?

36.14

How could the City Planning Department even considered drafting and EIR on a project of this magnitude without inquiring and making sure that the money that will pay for all this new construction is already there? This is beyond my comprehension.

36.15

If the Project is approved and demolition starts, and subsequently Parkmerced is sold and the new owners cannot continue with the construction for financial reasons, does it mean that the 7,260 residents including myself and my mother, will be left with a Parkmerced that is polluted and in ruins?

All the talk about caring for the environment is pure show off to cover up the real motives of this Project, that are: putting as many people in one place as they can possibly get away with, (**“after all density, is the name of the game here”**), to make as much money as the market will allow, by circumventing the Rent Control Ordinance in San Francisco, without any concern for the health and well being of the present residents.

I think this **“Imagine”** campaign launched by the owners, is an insult to our intelligence, trying to sell us the absurd concept that increasing the density of the place more than three times, converting Parkmerced in a noisy construction and demolition site for the next thirty years and endangering our health is the best thing that can happen to us.

This Project does not make any rational sense, from any angle that you may want to analyze it.

36.16

June 25, 2010

Public comments on Parkmerced EIR Draft

Can you even fit 8,900 units, cars and pets in a place where there were 3,221 units before? I sincerely think that it is not possible. As we all know space in the city of San Francisco is limited. There is only so much density that we can place in a pre-determined space, if not try to pour two gallons of water in a one gallon container.

I think this Project is unethical. Is guided only by greed and profit, from owners who do not reside in San Francisco and think they have found a new way to circumvent the Rent Control Ordinance that has permitted thousands of us, long time San Francisco residents and tax payers like me, to remain in our homes.

The only option that is acceptable to me on this EIR is the one that leaves Parkmerced intact, the way is now, without any changes or new construction and to declare it a landmark historical site.

We should be proud that such a place exists and that we have the privilege of living here, and not give in to mercenary interests trying to convert this beautiful landscape and magnificent design into a Muni station surrounded by overcrowded high rise buildings in a few words a nightmare to come home after a day of work.

The option presented on this EIR of leaving the 3,221 units intact, and building thousands of new units around Parkmerced is even a much worse option than the previous one, as if that could be possible, the blunt of construction on Phase One of the Project from 2010 to 2015 will be built around building No. 40 where I live.

I am totally opposed to any new construction being built anywhere at Parkmerced. The only alternative acceptable to me is the: No Project Alternative.

I need to know as a citizen and tax payer who is financing this massive EIR Draft preparation that has been going on for years now. This must have already cost millions of dollars spent in salaries to the Planning Department staff, and to pay for all the studies ordered in this Project. Is this money coming from taxpayers dollars? If yes, who has so much power to order such an undertaking without consulting it first with the San Francisco voters.

I know one fact for sure here. Nobody, absolutely nobody, will ever decide for me where and in what conditions I am supposed to live in order to accommodate economic interests that are only looking to profit at the expense of my misery; what density my dwelling is suppose to have, now that over 500 square feet is considered "normal". If we let this go by in a few years we will be told that 50 hundred square feet for each of us is normal and we will have to take it.

36.16
con't

June 25, 2010

Public comments on Parkmerced EIR Draft

In order to keep our bodies and our minds in good health, we need ample space to move around, homes with big windows full of day light coming in, we need sunlight, we need nature surrounding and nurturing us, we need clean air and water, clean and organic food, and most of all we need freedom to decide for ourselves what is best for us.

Since July 28, 1999, when the previous owners of Parkmerced bought the property, year after year, I have had to put up with the previous owners trying to get our rents constantly raised by filing petitions with the Rent Board and getting away with it. And now the final blow comes, the "brilliant and genial idea" of converting Parkmerced into a construction and demolition site for decades to come, demolishing the old units and taking thousands of units out of the San Francisco Rent Control Ordinance. I say stop it, enough is enough. We pay our rents on time, we are good tenants. Let us live in peace and quiet, we deserve it. Everybody deserves a quiet and peaceful life with no conflicts and in good health to enjoy it.

I believe that voicing my total opposition to this Project is the least that I can do for Parkmerced, a place that I love and that I have called home for so many years, with an enchanting and magical ever changing landscape, full of trees and green areas, at times shrouded by fog and other times flooded with sunlight. Where else will we be able to enjoy the different species of birds flying pass our windows, the moon being reflected on the ocean at night. I will pick nature over cement and overcrowding any time.

Please help us keep Parkmerced the place it is now for all of us and for future generations of modest income renters like me and my family.

In Europe, they keep their buildings for centuries, and they show them with pride to the millions of tourists coming to visit.

We cannot continue ignoring the fatal and irreversible consequences that our actions have in our environment.

My ninety one year old mother and I, cannot afford to pay today's market price rents in San Francisco, or move elsewhere.

I would like to see a Plan put in place by the present Owners and the City of San Francisco to financially compensate adequately, the residents that cannot remain in their units for health reasons, or who do not wish to live in a construction site for the next thirty years if the Proposal is approved. I hope that if such a plan is put in place the money granted as compensation to the displaced residents will be sufficient and will not remain in the hands of the institution in charged of distributing the funds, "for administrative costs" while the tenants are given a pittance, as it usually happens in these cases.

36.16
con't

June 25, 2010
Public comments on Parkmerced EIR Draft

We should not be forced by financial reasons to stay here, because we will not be able to find an affordable unit at the present rent rates. In today's San Francisco, even Public Housing lists are closed, and Section 8 lists have been closed since 2001. We ought to be offered alternatives to move out of Parkmerced if the Project is approved.

36.16
con't

Finally, I would like to call your attention to a letter addressed to all Parkmerced residents, that I received a few years ago, dated July 28, 1999, signed by Mr. Bert Polacci, as Chief Operating Officer of Carmel Development and Management Co., informing me that as of that day Carmel Development and Management Co., had purchased Parkmerced from the Helmsley organization.

As of that day, the complex encompassed 196 acres and contained 3,483 residential units and 47 blocks. After that date, the new landlord Olympic View Realty, LLC, sold 44 acres of land leaving the present 152 acres of land and also sold block No. 1 of 47, with twenty seven rental units, blocks two, five and six with 153 rent control units. **These transactions did not occur over decades, as you state on your EIR, they happened from July 28, 1999 to September 2005 when Olympic View Realty LLC, sold Parkmerced to the present owners. So please correct this information on your EIR.**

36.17

As a tenant and interested party I was never informed that a big chunk of Parkmerced had been sold to third parties and that the tenants had lost hundreds of rent control units and 44 acres of land, I ignored that such transactions were taking place at that time in order for me to voice my opposition.

I only learned about them when on August 15, 2002, I received one of the many decisions by the San Francisco Rent Control Board dated August 13, 2002, informing me that 46 petitions had been filed on January 24, 2001 by the landlord, Olympic View Realty LLC, to raise my rent "above established limitations based on increased operating and maintenance costs for 2,702 of 3,456 residential rental units in the Parkmerced apartment complex. Since the purchase of the property on July 28, 1999 the property has been managed by Carmel Development and Management Corporation, LLC".

Parkmerced is subject to the San Francisco Rent Control Ordinance, how was it possible to divide the property and sell so many **Rent Control** units under the nose of the competent authorities without informing the public? Why were Parkmerced residents kept ignorant of what was taking place, until it was too late to voice our opposition? There are too many unanswered questions here that defy all logic.

On Thursday, August 15, 2002, I received a decision by the Residential Rent Stabilization and Arbitration Board, City and County of San Francisco, dated August 13, 2002 signed by the Administrative Law Judge. Under Findings of Facts, I quote excerpts from the sixty one page document:

June 25, 2010
Public comments on Parkmerced EIR Draft

“ When the landlord purchased the property in July 1999 there were 3,483 residential rental units. There were 47 blocks at the time the landlord purchased the property. In February 2000, prior to filing these petitions, the landlord sold the 27 residential units in Block # 1 (tax parcel 7306) to San Francisco State University Foundation”.

“On January 14, 2002, the Rent Board received a letter from some of the tenant respondents indicating that Blocks 2,5 and 6 (153 units total) were sold to San Francisco State University Foundation after the conclusion of the hearings, etc.”

Other private third parties also bought land and buildings from the Parkmerced complex between 1999 to 2005. Please request this information from the Rent Board, or other public sources if you need it.

Please think on the thousands and thousands of hard working San Francisco residents in need of affordable housing when deciding to eliminate or not, one of the last places protected by the San Francisco Rent Control Ordinance, where a working class person can still afford to live with dignity in this beautiful city.

On behalf of my mother and myself, I thank you very much for listening to my concerns.

Sincerely,



María Elena Guerrero Engber
Marigen Hellen Engber de Guerrero
Residents at 310 Arballo Drive, Apt., 11 D
San Francisco, CA 94132
Telephone (415) 586-2701

Cc: San Francisco Supervisors Elsbernd and Daly

RESPONSES TO LETTER 36

Maria Elena Guerrero Engber, June 25, 2010

Response 36.1

The comment expresses opposition to the Proposed Project, stating that the Project Site is too small to accommodate the proposed amount of development or the extra parking that would be needed, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project. Please refer to Master Response A.2, Transportation and Circulation, in Section III.A, Master Responses, for discussion of the relationship between the Proposed Project's parking supply and the EIR.

The comment also refers to a potential pet population increase as a result from implementation of the Proposed Project, but does not raise any specific comment on the adequacy and accuracy of the analysis presented Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 36.2

The comment refers to public comments made at the June 17, 2010, Planning Commission meeting regarding the enforceability of rent control units. Please refer to Responses TR.20.2 and TR.20.3, in Section III.B, Public Hearing Comments and Responses, for a discussion of the enforceability of rent control units.

Response 36.3

The comment asserts that the Draft EIR does not adequately address health and quality of life impacts. Please refer to Response TR.17.1.

Response 36.4

The comment asserts that the EIR should have concluded that the land use impacts of the alternatives to the Proposed Project would be significant. Section V.A, Land Use, pp. V.A.9-V.A.10, lists the significance criteria used to evaluate the Proposed Project's land use impacts. The same significance criteria are used to evaluate the land use impacts of the alternatives to the Proposed Project. Although the alternatives would result in changes to the existing land uses on the Project Site, none of the alternatives would physically divide an established community or have a substantial adverse effect on the character of the vicinity. Based on these significance criteria, the land use impacts of the alternatives, like the land use impacts of the Proposed Project, would be less than significant.

Response 36.5

The comment asserts that the numerous physical changes to the Project Site should have resulted in a conclusion that the land use impacts of the alternatives would be significant. Please refer to Response 36.4.

The comment also asserts that the conclusions under impacts under the topics of Land Use, Population and Housing, and Alternatives are incorrect. Section V.A, Land Use, pp. V.A.9-V.A.10, and Section V.C, Population and Housing, p.V.C.7, list the significance criteria used to evaluate the Proposed Project's land use and population and housing impacts. The same significance criteria are used to evaluate the land use and population and housing impacts of the alternatives to the Proposed Project. As similarly described in Response 36.4, above, based on these significance criteria, the land use impacts of the alternatives, like the land use impacts of the Proposed Project, would be less than significant.

Response 36.6

The comment states that tripling the number of units would be a significant impact. Please refer to Response 17.4.

Response 36.7

The comment states that prolonged exposure to air pollution and noise from demolition and construction will cause residents to become sick. Construction activities can cause a range of potential public health impacts that are identified throughout the EIR for the decision-makers to consider. As such, there is not one single measurement of adverse health risks but rather a variety of descriptors. For example, Response 35.4 addresses noise during construction, and the EIR provides information on various adverse construction-related air quality effects (Impact AQ-1, p. V.G.19, Impact AQ-3, p. V.G.24, and Impacts AQ-10 and AQ-12, p. V.G.35). Additionally, the potential health effects of various activities (for example, activities related to asbestos removal during demolition) are identified in the EIR in Section V.P, Hazards and Hazardous Materials, under Impact HZ-2, p. V.P.10. Please refer to Response TR.17.4 for further discussion of asbestos and toxic air contaminants due to construction activity.

Response 36.8

The comment asserts that the Draft EIR does not address the health effects of exposing residents to asbestos from demolished buildings over the construction phases. Please refer to Response TR.17.4.

The comment also raises concerns about noise from constant construction, demolition, and traffic. Please refer to Response 35.4 for a discussion of noise impacts from construction activities. The noise levels associated with the traffic are described in the EIR in Section V.F, Noise, on pp. V.F.5-V.F.9, and in Impact NO-3 on pp. V.F.21-V.F.24.

Response 36.9

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project and implement the proposed mitigation measures, citing recent financial media coverage of the Project Sponsor. Please see Response TR.1.2.

Response 36.10

The comment states that there are too many vacant units at Parkmerced now to warrant an additional 5,679 units. As discussed in Section V.C, Population and Housing, the Project Site is in an area that has been identified by the Association of Bay Area Governments as one of 10 urban areas in the City with the potential to accommodate substantial population growth. The Proposed Project would conform with the Association of Bay Area Government's designation of the Parkmerced Site as a Priority Development Area. The Proposed Project's new units would be constructed over a 20-year period. At buildout, the 12,950-person increase in Parkmerced's residential population that is anticipated would substantially change the existing areawide population, but not beyond growth levels expected and incorporated into local and regional planning efforts.

Response 36.11

The comment inquires about the SFSU Master Plan's relationship to the Proposed Project. The SFSU Master Plan is a separate development with which the Parkmerced Project Sponsor has no involvement and which is not part of the Proposed Project.

Response 36.12

This comment expresses general opposition to construction and traffic impacts should the Proposed Project be implemented, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 36.13

The comment states opposition to the rerouting of the M Ocean View light rail line through the project site, citing concerns over noise and pollution that would result, but does not raise any

specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 36.14

The comment inquires about impacts to existing vegetation and open space states once the Proposed Project is implemented. As described in Chapter III, Project Description, p. III.1, the Project Site would be comprehensively replanned and redesigned. Existing open space and vegetation, including most of the trees on the Project Site, would be removed over a period of 20 years. The proposed open space and tree replacement plan are described on pp. III.16-III.23.

Response 36.15

The comment raises concerns about the Project Sponsor's ability to complete the Proposed Project. Please see Response TR.1.2 for a discussion of this issue.

Response 36.16

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on adequacy or accuracy of the Draft EIR. The comment may be considered by the Planning Commission as part of their decision to approve or disapprove the project.

Response 36.17

The comment states that the selling off of portions of the original Parkmerced Project Site did not occur over many decades as stated in the Draft EIR. The commentor is correct, and the third sentence in the last paragraph on p. III.4, in Chapter III, Project Description, has been revised as follows:

Over ~~many~~ the past decades, various blocks of the original development complex have been subdivided and sold to third parties.



Rick
Cooper/CTYPLN/SFGOV
06/28/2010 11:05 AM

To jtilley@consultturnstone.com
cc
bcc
Subject Fw: Parkmerced DEIR

----- Forwarded by Rick Cooper/CTYPLN/SFGOV on 06/28/2010 11:05 AM -----



"Inge Horton"
<ingehor@pacbell.net>
06/28/2010 10:19 AM

To <bill.wycko@sfgov.org>, <Rick.Cooper@sfgov.org>
cc
Subject Fw: Parkmerced DEIR

Hi Rick,
Eileen Boken aeboken@msn.com is out of own and asked me to forward her edited comments on the Parkmerced DEIR to you.
Inge Horton

----- Original Message -----

From: AEBOKEN Boken
Sent: Monday, June 28, 2010 2:40 AM
Subject: Parkmerced DEIR

Hi Inge,

I have reviewed the DEIR for Parkmerced for the transportation sections of Section III (Project Description) only.

If the project sponsors are unable to meet their current debt payments for Parkmerced, they are unlikely to get financing for a \$ 1 billion + construction project.

The transportation proposal has some real issues.

1) There seems to be the assumption that any additional traffic would be going southbound on 19th Avenue south of Holloway and that 19th Avenue north of Holloway would not be impacted. This is unlikely to be true.

37.1

2) Page III.30 states that "Three new stations would be created within Parkmerced." This refers to re-routing the "M" streetcar to go inside Parkmerced. This means that there would be public transit stations on private property. Also streetcar tracks would be on private property. To me this create jurisdictional and liability issues. Also, San Francisco State students would need to go to Parkmerced to catch the "M" streetcar. Thousands of students would be "invading" private property . Also, all three of the Muni stations are on the eastern perimeter of the property in odd locations.

37.2

3) Page III.30 states "The Project Sponsor also proposes to construct new transit and infrastructure improvements in City streets adjacent to the Project Site." This means a private entity would be making changes to public streets. Again, this may create jurisdictional and liability issues. There are a total of twelve modifications proposed to City streets which are off the project site. These include additional entry points, additional capacity to existing entry points/intersections, dedicated lanes, intersection re-alignment

37.3

and additional lanes (19th Avenue and Brotherhood Way). These are extensive changes.

Eileen

RESPONSES TO LETTER 37

Eileen Boken, June 28, 2010

Response 37.1

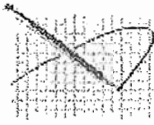
The comment raises concerns about the trip distribution forecasts used in the transportation analysis, specifically the conclusion that increases in traffic on 19th Avenue north of the Project Site would be relatively small. Please refer to Master Response A.2, Transportation and Circulation, Section 2.1, in Section III.A, Master Responses, for a discussion of the Proposed Project's geographic trip distribution. Generally, the Proposed Project would generate more trips to Downtown San Francisco (which would be more likely to use transit or drive on routes other than 19th Avenue) than to the Peninsula or South Bay.

Response 37.2

The comment raises concerns about jurisdictional and liability issues of moving the light rail line onto private property. Streets internal to the Parkmerced site would be owned and maintained by the City of San Francisco. The light rail facilities, including rails, overhead wiring, and platforms, would be on City streets for the most part, which would be owned and maintained by the City of San Francisco, not the Project Sponsor. For areas on private property, the City of San Francisco would have an easement.

Response 37.3

As in the above comment, the comment raises concerns over jurisdictional and liability issues of a private entity making public improvements to City streets. It is unclear at this point whether the City or the Project Sponsor would hire contractors to construct improvements. Regardless, the improvements would be funded by the Project Sponsor, and prior to construction, designs would need to be approved by the City. Improvements on State facilities would also need to be approved by Caltrans. Ultimately, this comment does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR.



PIC/CTYPLN/SFGOV
07/01/2010 09:14 AM

To: Rick Cooper/CTYPLN/SFGOV@SFGOV
cc: Rbn343@comcast.net
bcc:
Subject: Fw: Parkmerced's proposed expansion

History: This message has been forwarded.

please reply to sender.

-----Forwarded by PIC/CTYPLN/SFGOV on 07/01/2010 09:13AM -----

To: pic@sfgov.org
From: Rbn343@comcast.net
Date: 06/29/2010 04:43PM
Subject: Parkmerced's proposed expansion

I hope that I am able to express to you how damaging to the environment, and the current residents, the proposed 30-year Parkmerced plan is.

I am a long-time resident, over 35 years, and the main reason my family chose to live in Parkmerced was the garden-apartment option. We live in a 3 bedroom, 2 bathroom, "townhouse" that is part of a courtyard with a central grassy field. There are no hallways, elevators, or lobbies to navigate. When I see a neighbor walking their dog, I can pop out the door and say hello. If my cat wants some outside-time, I can let him out and keep an eye on him from just inside the door. Although we have a parking space in the carport, we can almost always find a spot on the street just steps from our front door. It feels more like a house than an apartment. There are many similar courtyards in Parkmerced, and these are what Parkmerced is planning on demolishing.

Their plan is to erase the unique character of Parkmerced, the historical and personal significance it has for its residents. They say that the buildings are old, and were only meant to be temporary when built. This is a one-of-a-kind, master-planned community that needs to be protected, renovated, and maintained. Their plan is also to increase the already population dense area three-fold, which will result in an untold increase in traffic congestion in an area already famous for pedestrian traffic accidents (19th Avenue @ Holloway). No longer will this be a San Francisco neighborhood, but rather it will become a cookie-cutter housing development in which the goal is to maximize occupancy per square foot, and most likely increase the student occupancy. They say that Parkmerced is a "bedroom community," which isn't exactly correct, but what would be wrong with that? This is not downtown, and people live here because they don't want to be in the middle of the bustling city.

The plans to create "retail shops" is ludicrous. We had a thriving grocery store, pharmacy/drug store, barber shop, hair salon, deli, and bank and they failed. We have Stonestown a few blocks away, Westlake less than a mile away, and other shopping areas within 2 miles. In addition, SFSU has their own retail shops. This is not a commercial district, it's a residential community. They claim to have plans to maintain certain areas of open-space, and vegetation, but they are drastically cutting down on the amount of open area that is home to native plants and wildlife. They mention that the trees

have gotten too old to live, but reality is that Parkmerced doesn't maintain the landscape do the trees die. Over the past 3 years, Parkmerced has instructed the gardeners to come twice a year and cut everything down to stubs in order to limit the money spent on maintaining the grounds.

The construction itself will be a huge energy drain, and will cause noise and air pollution. The planned increase in density alone will have a negative impact on the air-quality of the neighborhood because there will be too many people and too many cars. They also claim to be promoting the use of bikes and public transportation, but they are by necessity proposing an increase in structured parking from 959,400 sq ft to 2,900,000 sq ft. The plans to bring the Muni line into Parkmerced, and have a shuttle to BART are meaningless. Currently MUNI is accessible right across the street from Parkmerced's entrance, there is a SFSU Shuttle to BART, and an existing busline right in front of the property. Why would the city need to spend millions of dollars to bring the transportation lines in a couple of blocks? This would create noise, and congestion, without improving traffic or pedestrian flow.

In addition to the negative effects this plan would have on the people, the landscape, and the wildlife, there is also the very likely possibility that if approved, funding could run out before construction is completed. Stellar Management's current financial situation is tenuous, with talk of re-financing and bankruptcy, and there is nothing to show that it will improve in the near future. If a project of

38.1
con't

this magnitude were allowed to begin, and lack of funding caused a cessation of work, we the residents would be left to live in the middle of an abandoned construction zone. If funding is somehow located, we will be forced to live in a 30-year construction zone. For disabled and senior tenants, this would be an untenable situation that would be tantamount to eviction. Beyond the issue of no longer being able to choose a garden apartment, current residents will be forced to move into the new towers as they are built. That means that I may be forced to move closer to Lake Merced Blvd and the traffic that is always there, rather than remaining on my peaceful inner street. There is also the issue of rent control, and how the tenants would be guaranteed that the new apartments they are forced into would be maintained under the rent control ordinance from the year that they first became tenants. How easy would it be for Parkmerced to try to raise rents by claiming that the apartment for which the original rent was established no longer existed, and therefore rent control could not be based on prior leases.

38.1
cont'

There are so many reasons why this plan is bad for the residents of Parkmerced, and also for the environment itself, that I hope that you will not allow it to go forward.

Robin Cowen

32 Bucareli Drive

SF, CA 94132

Originally moved in to Parkmerced in August 1974

RESPONSES TO LETTER 38

Robin Cowen, June 29, 2010

Response 38.1

This comment expresses general opposition to the project and raises concerns about the following issues: population increase, air quality, noise, increased retail space, financial feasibility of the project and rent control, but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project. The EIR addresses population increase in Section V. C. Population and Housing, pp. V.C.1-V.C.18. Air Quality is discussed in Section V. G, Air Quality, pp V.G.1-V.G.40. Noise is discussed in Section V.F., Noise, pp. V.F.1-V.F.35. Proposed retail space for the project is discussed in Chapter III, Project Description, p. III.16. For a discussion of the proposed retail space and surrounding retail areas, please refer to Response TR.11.3. For a discussion of the financial feasibility of the Proposed Project, please refer to Response TR.1.2. For a discussion of rent control and the Proposed Project, please refer to Responses TR20.2 and TR.20.3.

RECEIVED

JUL 07 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

July 1, 2010

San Francisco Planning Department
Ref: Parkmerced Project Environmental Review Offer
1650 Mission Street
Suite 400
San Francisco, California 94104

Planning Department Case No.: 2008.0021E

State Clearinghouse No.: 2009052073

Dear San Francisco Planning Department:


As a soon to be established business owner in the original Parkmerced Shopping Center, the proposed Parkmerced Mixed-Use Development Project is of enormous concern to me. Though the project is appealing and provides the opportunity for Parkmerced residents to improve their quality and standards of lifestyle, the establishment of a new 300,000 square foot retail shopping area is threatening.

The location of Parkmerced Shopping Center is below grade behind 19th Avenue and can only be entered into by Crespi Drive or Font Street. Being that a future 300,000 square foot retail location will be developed, it is necessary that Parkmerced Shopping Center be given particular attention and must not be ignored. The existing Parkmerced Shopping Center must be more visible to the consumer eye. This factor alone has the potential to generate a steady and substantial business flow, which will ensure survival of my business.

Upon reviewing the Environmental Impact Report, I understand that an entrance will be constructed from 19th Avenue entering onto Cambon Drive. I resolutely support the new entrance that Park Merced L.L.C. has proposed from 19th Avenue entering onto Cambon Drive, and strongly encourage the San Francisco Planning Department to ensure this increased access is made available to the general public. The establishment of this entrance is imperative to the success and survival of my small, family owned business.

Thank you for taking the time to consider my businesses viability, both now and in the future. Any assistance in this matter would be greatly appreciated. The residents and small business owners of the City and County of San Francisco are very fortunate to have such a supportive Planning Department – one that ensures the character of the neighborhoods of San Francisco remains unique.

Regards,

Signature:  _____

Name: Reina Pastor

(415) 5331883

LETTER 39 COMMENTORS

Letter 39 was submitted individually by 23 people, listed below. The letters are the same, except that at the beginning of the first paragraph, some owners identified themselves as “a soon to be established business owner,” others identified themselves as “a newly established business owner,” and several identified themselves as “an established business owner.”

Café Rina:

- Anthony Pastor
- Reina Pastor

Frozen Cup:

- Terry Walker

Herb N' Legend:

- Samer Jweinat
- Naji El-khuri (also for Hall of Flame Burgers)

Hall of Flame Burgers:

- Basil El-khuri
- Ramzi El-khuri

Manuia Polynesian Dance Studio:

- Kay Tualauddlei
- Tommy Tualauddlei

Papa John's Pizza:

- Paul Shamieh
- Yousef Shamieh

Park Plaza Fine Foods:

- John Jweinat
- Maha Jweinat

Parkmerced Postal Service:

- Jamie Jweinat

Parkmerced Sports Club:

- Angelo N. Basso
- Gaetano Basso
- Thomas Basso

Parkmerced Tacqueria:

- Peter Foundas
- Vincent Schofield
- Tim Drolapas (also for Wash N' Dry Laundry)

Promax Martial Arts Academy:

- Al Castillo
- Perla J. Castillo

Wash N' Dry Laundry:

- Tim Drolapas (submitted letter twice)

RESPONSES TO LETTER 39

Café Rina, Anthony Pastor, July 1, 2010

Response 39.1

The comment expresses general support for the Proposed Project, but wants assurance that an entrance will be constructed from 19th Avenue entering onto Cambon Drive. This proposed circulation change would add new access from 19th Avenue to Cambon Drive, facilitating vehicular and pedestrian access to the existing retail area in the Parkmerced shopping center. This proposed change is analyzed as a sub-variant to the Proposed Project or the Project Alternative in Section V.E, Transportation and Circulation, in the EIR. In either case, the Cambon Drive access would permit right-turns in from southbound 19th Avenue only. No egress from the Project Site onto 19th Avenue would be permitted. A description of how this access would operate, either with the Proposed Project or the Project Alternative is included on p. V.E.37 of the EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

RECEIVED

July 1, 2010

JUL 1 2010

Mr. Bill Wycko,
Environmental Review Officer
San Francisco Planning Department
1650 Mission St., Suite 400
San Francisco, CA 94103

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.F.A.

HAND DELIVERED

RE: CCSF Planning Department Case no. 2008.021, Draft EIR

As current residents of Parkmerced we outline our concerns as follows:

1, Nearly tripling the number of units to 8,900 will dramatically increase the number of residents, although the EIR makes no reference as to the estimated number of additional residents. More residents means more people transiting in and out of Parkmerced. At present Lake Merced Boulevard is bumper-to-bumper during rush hour and 19th Avenue is worse. The current traffic and level of safety has necessitated the state mandate a slower traffic speed for 19th Avenue. The intersection of 19th and Holloway is extremely congested with traffic, students and MUNI. While the EIR speaks of increased MUNI service and suggests alternative modes of transport, such as bicycles, the M car can only hold so many people at one time and not everyone is capable of riding a bike nor is every trip possible on a bike. In other words, the increase in population will of necessity adversely affect transportation routes.

40.1

2. The EIR proposes tearing down existing town houses and replacing most of them with high-rise buildings. I believe that this would be against the desire for San Francisco to be family friendly and therefore create a negative social environmental impact. High-rise living is not conducive to families with children. They have no place to play and other tenants are sometimes unhappy with the normal noise and activity of children. At present, the townhouses hold many families. The children play outside either in front of the home or on one of the many safe, grassy areas in back or between all townhomes.

40.2

40.3

3. San Francisco does not need more high-rise apartment buildings. We have enough in the downtown area. The Western part of the city has traditionally been an area of families, homes and yards. In these respects, Parkmerced was a wonderful addition. The changes that are part of this EIR would not fit in nor make a positive addition to the area.

40.4

Respectively prepared and submitted by:

Margaret E. Leahy, Ph.D.
542 Arballo Dr. (415-586-4606)

Margaret E. Leahy

for myself and the attached list of concerned current residents. 5 PAGES

1. GENEVIEVE L. CALLEJO 415-586-7523
NAME PHONE NUMBER

Genevieve L. Callejo 552 ARBALLO DRIVE
SIGNATURE ADDRESS

2. GENEVIEVE CALLEJO POA 586-7523
NAME PHONE NUMBER

FOR RICARDO A CALLEJO
Genevieve Callejo POA 552 ARBALLO DRIVE
SIGNATURE ADDRESS

3. NEMESIO J. PAREDES 415-333-3069
NAME PHONE NUMBER

Nemesio J. Paredes 554 ARBALLO
SIGNATURE ADDRESS

4. LOURDES PAREDES 415-333-3069
NAME PHONE NUMBER

Lourdes Paredes 554 ARBALLO
SIGNATURE ADDRESS

5. John Norris 546 Arballo Dr
NAME PHONE NUMBER
JOHN NORRIS #415 239-7408

SIGNATURE ADDRESS

6. Janet Karesh 582 Arballo Dr
NAME PHONE NUMBER

JANET KARESH 582 415-587-8767
SIGNATURE ADDRESS

7. SID GALINDIS 415-290-3653
NAME PHONE NUMBER

Sid Galindis 542 ARBALLO DR
SIGNATURE ADDRESS

8. STEPHEN WEN 415-586-2809
NAME PHONE NUMBER
Stephen Wen 556 ARBALLO 94132
SIGNATURE ADDRESS
9. Tracie L Wen 415 586 2809
NAME PHONE NUMBER
TRACIE L WEN 556 ARBALLO DRIVE
SIGNATURE ADDRESS
10. Mahin Abitarabi 415-587-2766
NAME PHONE NUMBER
M. Abitarabi 550 Arballo Dr.
SIGNATURE ADDRESS
11. Jafar Abitarabi 550 Arballo, Dr.
NAME PHONE NUMBER
Abitarabi (415) 587-2766
SIGNATURE ADDRESS
12. COLLEEN GALLAGHER 415-324-9218
NAME PHONE NUMBER
Colleen Gallagher 544 ARBALLO DR.
SIGNATURE ADDRESS
13. DEBORAH GALLAGHER 415-469-8844
NAME PHONE NUMBER
DIRECTIVE FOR DEBORAH GALLAGHER
Deborah Gallagher 544 ARBALLO DR.
SIGNATURE ADDRESS
14. LORA M. TRAVELER 415-586-2768
NAME PHONE NUMBER
Lora M Traveler 405 Semoran Rd Apt 1210
SIGNATURE ADDRESS

15. MIE ANNIE DELL'ALTE 415 333-2074
 NAME PHONE NUMBER

Mie Annie Dell'Alte 558 Arballo Dr.
 SIGNATURE ADDRESS

16. JOHN P. HOLLAND, JR 415-469-5625
 NAME PHONE NUMBER

John P. Holland Jr 572 ARBALLO DR.
 SIGNATURE ADDRESS

17. John McBlain 415-469-5625
 NAME PHONE NUMBER

John McBlain 572 ARBALLO DRIVE
 SIGNATURE ADDRESS
 S.F. CA 94132

18. Jillye Jolly Kwong
 NAME PHONE NUMBER

Jillye Jolly Kwong
 SIGNATURE ADDRESS
 566 ARBALLO DR.
 S.F. CA 94132

19. Diane Noguchi 415-0281
 NAME PHONE NUMBER

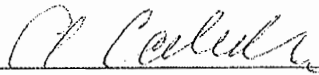
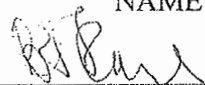

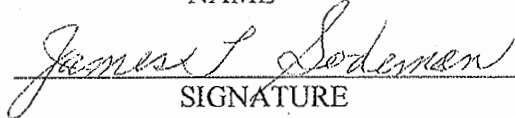
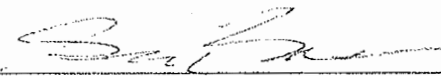
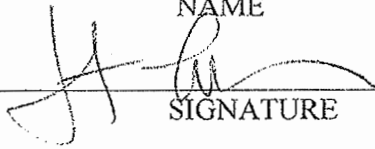
Diane Noguchi 568 Arballo Drive
 SIGNATURE ADDRESS
 S.F. CA 94132

20. Annie McMillan Young (415) 333-2407
 NAME PHONE NUMBER

Annie McMillan Young 506 Arballo Dr.
 SIGNATURE ADDRESS

21. Stuart Stehwick 564 Arballo Dr.
 NAME PHONE NUMBER

Stuart Stehwick
 SIGNATURE ADDRESS

- | | | |
|-----|---|------------------|
| 22. | Anna Calderon | (415) 337-1706 |
| | NAME | PHONE NUMBER |
| |  | 536 Arballo DR |
| | SIGNATURE | ADDRESS |
| 23. | Benjamin Calderon | as above |
| | NAME | PHONE NUMBER |
| |  | as above. |
| | SIGNATURE | ADDRESS |
| 24. | Angelo Arballo | 534 ARBALLO DR |
| | NAME | PHONE NUMBER |
| |  | 533-2922 |
| | SIGNATURE | ADDRESS |
| 25. | JAMES T SODEMAN | 585-3057 |
| | NAME | PHONE NUMBER |
| |  | 405 SERAFIMOWICZ |
| | SIGNATURE | ADDRESS |
| 26. | SEAN Mc DONOUGH | 542 Arballo |
| | NAME | PHONE NUMBER |
| |  | 586-4606 |
| | SIGNATURE | ADDRESS |
| 27. | Jennifer Luerssen | 756-9288 |
| | NAME | PHONE NUMBER |
| |  | 2122 Vidal |
| | SIGNATURE | ADDRESS |
| 28. | | |
| | NAME | PHONE NUMBER |
| | SIGNATURE | ADDRESS |

29. JAMES M. COPPER (415) 587-8574
 NAME PHONE NUMBER
James M. Copper 405 SERRANO DR #12K SF CA 94132
 SIGNATURE ADDRESS
30. WILLIAM P. VOGEL (415) 469-8449
 NAME PHONE NUMBER
William P. Vogel 405 SERRANO DR #BJ SF-CA #113
 SIGNATURE ADDRESS
31. *M. H. Vimbachari* 415-239-4180 # 355, SERRANO DR #12-C
 NAME PHONE NUMBER SAN FRANCISCO CA 94132
Ralph Eisman 405 SERRANO DR 11F
 SIGNATURE ADDRESS
32. RAIPH EISMAN 415-333-0421
 NAME PHONE NUMBER
Ralph Eisman 414 Acbalto Dr
 SIGNATURE ADDRESS
33. SUSAN SPECTOR 415 333-3599
 NAME PHONE NUMBER
Chingwon Kwon 405 SERRNO
 SIGNATURE ADDRESS
34. CHONG KWON 585-2394
 NAME PHONE NUMBER
Jessie mae Phillips 405-Serrano Dr 10 H
 SIGNATURE ADDRESS
35. Jessie mae Phillips 415-337 5764
 NAME PHONE NUMBER
 SIGNATURE ADDRESS

RESPONSES TO LETTER 40

Margaret E. Leahy et al., July 1, 2010

This letter was submitted by Margaret E. Leahy with an attached list of 34 signatures.

Response 40.1

The comment states that the Draft EIR does not reference the estimated number of residents resulting from the planned tripling number of residential units. As described in Section V.C, Population and Housing, pp. V.C.13-V.C.14, the Proposed Project would increase the existing on-site residential population from about 7,340 people to about 20,290 people in 2030.

Response 40.2

The comment states that the increase in population will adversely affect transportation routes. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses.

Response 40.3

The comment raises concerns about tearing down the garden apartments to construct high rise buildings, particularly the effects on families with children, because there would be no safe, grassy areas to play. As described in the EIR in Chapter III, Project Description, p. III.16, the Proposed Project would provide open space through a network of publicly accessible neighborhood parks, public plazas, and greenways. A series of playgrounds and parks would be provided throughout the development area, adjacent to residential uses. New athletic playing fields for active and passive recreation are also proposed.

Response 40.4

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

YOUSEF REALTY L.L.C

111 Cambon Drive • San Francisco, California 94132
Phone: 415-776-0121 • Fax: 415-776-9894 • E-Mail: yousef.reealty@gmail.com

RECEIVED

JUL 07 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

July 1, 2010

San Francisco Planning Department
Ref: Parkmerced Project Environmental Review Offer
1650 Mission Street
Suite 400
San Francisco, California 94104

Planning Department Case No.: 2008.0021E

State Clearinghouse No.: 2009052073

Dear San Francisco Planning Department:

Yousef Realty L.L.C. is owner of the Parkmerced Shopping Center property. When the Parkmerced Mixed-Use Development Program was introduced, Yousef Realty L.L.C. expressed considerable concern around the potential retail space construction. Currently, the original shopping area situated on the grounds of Parkmerced is comprised of 25,000 square feet. The proposed project poses significant expansion to over 300,000 square feet. Despite this momentous difference in square footage, Parkmerced Investors L.L.C., assured the Yousef Realty ownership group that they would collaborate with Yousef Realty L.L.C. to co-exist within this project. In an effort to enforce our survival, Parkmerced Investors L.L.C. has developed a strategic plan to insert an entrance into Parkmerced Shopping Center from 19th Avenue entering onto Cambon Drive. In addition to this progress, Yousef Realty L.L.C. has three primary concerns that we believe the San Francisco Planning Department can address, which are outlined below with recommendations and outcomes, respectively.

Issue #1: Access to Parkmerced Shopping Center

Description: The location of the shopping center is below grade behind 19th Avenue and can only be accessed through Crespi Drive or Font Street. Unless having established prior awareness or familiarity with the area, it is difficult for one to acknowledge that Parkmerced Shopping Center exists.

Recommendation: Construct an entrance for vehicles from 19th Avenue entering onto Cambon Drive.

Outcome: Improve and expand access to recently established, small, family-owned businesses, which in turn secures employment, generates tax money for the City and County of San Francisco, and enhances the survival of these businesses.

41.1

Issue #2: Rezoning for Future Redevelopment

Description: Parkmerced Shopping Center is zoned at a mixed-use four-story restriction. The proposed Parkmerced Mixed-Use Development Program changes the Planning Code amendments for the Height and Bulk District Zoning Map. In order to attract the general public and stay competitive, Parkmerced Shopping Center needs to be more visible to the public eye, thus potential consumers.

Recommendation: Rezone the Parkmerced Shopping Center, located from 33 to 111 Cambon Drive, to a comparable level of the Parkmerced Mixed-Use Development Program.

Outcome: Rezoning of the Parkmerced Shopping Center will ensure the utilization of additional space, specifically around redevelopment for additional use, established conformity in the Parkmerced area, and enabling small businesses to stay competitive with higher, newly constructed buildings being developed through the Parkmerced Mixed-Use Development Program.

41.2

Issue #3: Standard Vehicle Access to Parkmerced Shopping Center

Description: The approved entrance from 19th Avenue and Junipero Serra onto Felix Avenue is limited to Muni vehicles. Standard vehicles are not able to utilize this entrance to access the small businesses located in Parkmerced Shopping Center.

Recommendation: Yousef Realty L.L.C. is willing to cooperate with the city and county of San Francisco and Parkmerced to enable standard vehicles to utilize this entrance. Yousef Realty L.L.C. is willing to donate land above Cambon Drive on 19th Avenue to have a road constructed.

Outcome: Increased access for standard vehicles into Parkmerced Shopping Center will enable residents and consumers to enter the area more accessibly while contributing to a reduction in traffic flow throughout 19th Avenue.

41.3

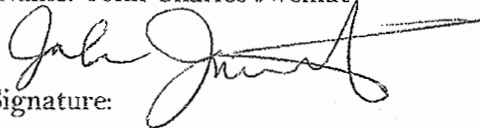
It is our hope that the approved developments, both with the Parkmerced Mixed-Use Development Program and our three recommendations for Parkmerced Shopping Center, will lead to a satisfying and affordable quality of life for the Parkmerced neighborhood. We are only concerned that the Planning Department's good intentions may lead to unintended negative consequences with respect to the survival of Parkmerced Shopping Center's current and future small family-owned businesses. We ask that you seriously consider our recommendations and look forward to further discussions around the mutual benefits of our recommendations for the Park Merced neighborhood, its employers, and most importantly, its consumers.

Thank you for your time and consideration. If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

Company: Yousef Realty L.L.C.

Name: John Charles Jweinat

Signature: 

Title: Owner

RESPONSES TO LETTER 41

John Charles Jweinat and Mah Sami Jweinat, Yousef Realty L.L.C., July 1, 2010

Response 41.1

The comment suggests that an entrance to be constructed from 19th Avenue entering onto Cambon Drive. Vehicular access to the Project Site from 19th Avenue was considered and analyzed as a sub-variant to the Proposed Project. Please refer to Response 39.1 for further discussion of this issue.

Response 41.2

The comment suggests that the Parkmerced Shopping Center (77-111 Cambon Drive) be included in the proposed rezoning of the Project Site. This comment does not address the adequacy or accuracy of the EIR. The Parkmerced Shopping Center is not part of the Project Site and, therefore, is not proposed for rezoning. Please refer to Response TR.7.3, in Section III.B, Public Hearing Comments and Responses, for a discussion of the Project Site analyzed in the EIR.

Response 41.3

The comment expresses a willingness to donate land above Cambon Drive in order to construct the new southbound right-turn lane off of 19th Avenue entering onto Cambon Drive. This comment is not a comment on the adequacy and accuracy of the analysis presented in the Draft EIR, but is noted.

To: Environmental Review Officer
Planning Department, 1650 Mission Street, #400
San Francisco, CA 94103

July 5, 2010
RECEIVED
JUL 17 2010
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.F.A.

From: Diana Scott and Joel Schechter
3657 Wawona
San Francisco, CA 94116

RE: PARK MERCED - comments on Draft EIR

As residents of the Outer Sunset and participants in the SFSU community, we know that currently, the streets of Park Merced accommodate a great deal of student parking weekdays, in addition to private parking for residents. It sounds like new development plans will create *a major problem* for students at SFSU (not all of whom can use public transportation, as they commute from various distances, at different times of day and night, and to jobs).

While additional MUNI access may be claimed to be “greener,” there's already plenty of MUNI access directly to the campus (K & M lines, plus buses). Increasing parking demand by eliminating curvilinear drives, and densifying occupancy is potentially a significant problem for this institution of higher learning, whose tuition hike already impacts students struggling to get a good state college education.

42.1

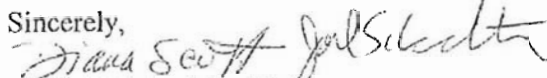
Privatizing parking with new high-rise construction – even including resident and student garages – is a way of transferring cost, rather than alleviating environmental impact. It disproportionately affects students. In addition, automobiles circling longer to find harder-to-get spaces will have a negative impact on surrounding air quality.

Also, the removal of 1500 units of affordable housing will constitute a serious loss to a campus community nearby at San Francisco State University. Faculty and students have relied on those affordable units in the Lake Merced region over the years, in order to fully participate in the community and campus life while at SFSU. Without such housing available, the area will suffer a great loss of cultural and educational diversity, which is part of the region’s “intellectual environment,” also worth preserving.

42.2

Last but not least, the original design of Park Merced, with grassy ovals where events are held and people walk, sit, and congregate informally, was in keeping with the foresighted planning or its creators, who sought to incorporated green open space for nearby residents into the original plan. By today’s standards, the Park Merced ovals still serve this user-friendly, green function, weighting the preservation option high with respect to competing developer plans that infringe upon green open space.

42.3

Sincerely,

Diana Scott and Joel Schechter

RESPONSES TO LETTER 42

Diana Scott and Joel Schechter, July 5, 2010

Response 42.1

The comment states that the Proposed Project will result in more parking difficulty and will create new air quality impacts from people circling for parking, and that there is no need for additional transit. Please refer to Master Response A.2, Transportation and Circulation, in Section III.A, Master Responses, for a discussion of the Proposed Project's parking supply. Air quality impacts as a result of increased vehicular traffic are discussed in Section V.G, Air Quality, pp. V.G.16-V.G.40.

Response 42.2

The comment asserts that the loss of rent controlled units would impact existing residents who reside at Parkmerced, including SFSU faculty and students. Please see Responses TR.2.2, TR.20.2 and TR.20.3, in Section III.B, Public Hearing Comments and Responses.

Response 42.3

The comment expresses a preference for the "Historic District Core" Alternative because it would preserve the landscaped oval areas on the Project Site. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Under the Proposed Project, the oval Commons, i.e., the open space defined by Juan Bautista Circle, and the landscaped medians along Font Boulevard and the roundabouts at Serrano Drive, Gonzalez Drive, Cambon Drive, and Chumasero Drive would be either reconfigured or removed to accommodate the proposed infrastructure improvements. The Commons currently provides passive recreation open space, i.e., open space for walking and a grass lawn for sitting and congregating, separated from traffic. The landscaped and grass medians and roundabouts along Font Boulevard provide more of a visual/scenic resource, in that they offer visual relief along Font Boulevard, rather than a more pedestrian-friendly area of usable open space. Visual impacts as a result of the loss of open space and landscaping are addressed in the EIR in Section V.B, Aesthetics, under Impact AE-1 on pp. V.B.20-V.B.21.

Regarding the demolition of open space resources on the Project Site, the comment correctly states that the removal of the landscaped medians and the roundabouts would constitute a portion of the 7 acres that would be lost under the Proposed Project. However, as described in Chapter III, Project Description, p. III.48, the Commons open space would not be demolished as part of the Proposed Project. Though the western portion of the oval would be designated for a 1.4-million-gallon stormwater retention pond, the remaining area would be maintained as publicly accessible open space and would continue to be available to residents as a location for passive recreation. Thus, the primary open space at the largest of the ovals, the Commons, would remain available to residents as a location for passive recreation.

To: pic@sfgov.org
From: Sharon Brock <sharonbrock@att.net>
Date: 07/07/2010 06:08PM Subject:
Parkmerced

San Francisco Planning Commission

I am a resident of the GARDEN apartments in Parkmerced, and I do not want to live in a low to mid-rise apartment. I moved into my apartment because of the courtyard, and the fact that my door opens to the outside world, not a hallway.

I moved here because I can easily go outside to the courtyard, anytime day or night, with my dog. It is also pleasant to see and say hello to a neighbor.

They call Parkmerced a "bedroom community," and somehow think that this is bad. If I wanted to live in an urban area with retail shops, and lots of congestion, I would move. We have everything we need close at hand. Public transportation is 2 blocks away, shopping is less than a mile away in 3 locations.

Parkmerced is unique, and that is a good thing. The last thing we need is another high density housing project.

I implore you to reject Parkmerced's planned destruction of our homes. No matter what they claim, they are not speaking on our behalf, they are only looking to maximize their profit margin.

Thank you,

Sharon Brock

43.1

RESPONSES TO LETTER 43

Sharon Brock, July 7, 2010

Response 43.1

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RECEIVED

July 7, 2010

JUL 08 2010

Mr. Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M E A

Re: Public Comments
Argument: The Preservation of Open Space

Dear Mr. Wycko:

As movements progress, they always seem to lose sight of their original goals and, what's worse, end up replacing them with the very things those goals were intended to avoid. And the environmental movement is no exception. If you were around in the 1960s, you know that everyone saw the greatest threat to our environment in overpopulation. Stanford biologist Paul Ehrlich's *The Population Bomb* was a best-seller, Manhattanization—that is, high-density housing—was denounced by one and all (as folkie Malvina Reynolds sang scornfully of "little boxes made of ticky-tacky"), and Open Space was universally regarded as the only thing that could save us from that fate. A generation later, not only has the population problem been quite forgotten, but overpopulation is actively encouraged, as we sacrifice Open Space to create high-density housing (Manhattanization) in order to prevent our growing population (bomb) from devastating the environment by using too many of our natural resources to go from Point A (home) to Point B (work). Ignoring the root problem, overpopulation, has brought us to this ridiculous pass. In the same way, ignoring the "root" solution, Open Space, will just as surely bring us to the "root" devastation, Manhattanization, which the environmental movement set out originally to avoid.

How did this happen? Simple: the current generation, ignorant of recent history, is fulfilling the old prophecy of being thereby doomed to repeat it. The result? We now have a new "generation gap" in the environmental movement between open-space advocates, on the one hand, and high-density-housing advocates on the other. But these approaches are not equally viable alternatives. High-density housing, a measure exhumed and proposed in desperation, aggravates all the well-documented stresses of overcrowding, whereas Open Space enhances the Quality of Life, another "forgotten" mantra of the '60s. While these bitter opponents argue endlessly about what should be built and where, there is a related but very different argument raging over what should be done in San Francisco's Parkmerced neighborhood. It's different because Parkmerced is not virgin suburban farmland waiting to be developed; it is an established urban neighborhood, one that is already an environmentalist's dream: airy open space enhanced by verdant expanses of grass and trees; low-density, low-height-limit units (many of them little houses available to people who would not otherwise be able to afford "homes" of their own), sprinkled with a few imposing towers (for those who would never be able to afford such splendid, "rich people's" views on their moderate incomes); and all of the amenities that residents need for a life-style that is easy on the environment (ample parking, varied public transportation—including BART—and plenty of shopping within walking distance). Moreover, innovations are constantly being adopted that make Parkmerced increasingly sustainable and "green" (farmers' market, recycling/composting and centralized garbage collection, reduced-flow faucets and toilets, etc.).

So why, you may fairly ask, do the current owners of Parkmerced want to tear it down and replace it with high-density housing? Simple again: money. Where you and I look out and see life-

enhancing Open Space, they see nothing but Empty Space, space that could be filled up with many more rent-producing units, stacks and stacks of little boxes. Why, you can actually see the dollar signs in their eyes! But don't get me wrong; I'm not opposed to capitalism. And Parkmerced is, after all, a housing complex with which the owners may do what they like, right? Well, yes and no. Technically, it is, but because of its vast size, its significant history and its invaluable contribution to the needs and welfare of San Francisco's diverse population, Parkmerced has become a genuine neighborhood with a personality of its own—not a "colorful" neighborhood like North Beach or "the Haight," but a family-oriented island of peace and security in the urban "jungle." As such, its beauty and benefits ought to be preserved for future generations of San Franciscans. The City That Once Knew How did not hesitate to protect this treasure in the past.

Built as war-time housing, after World War II Parkmerced quickly became an ideal housing solution for so-called Junior Executives and their families, young couples who needed affordable but presentable housing for their small children and budding careers. As such, it was included, and made famous, in William H. Whyte, Jr.'s classic 1956 study of this phenomenon, *The Organization Man*. A decade or so later, owner Metropolitan Life tried to convert Parkmerced to condominiums, which would have been a devastating blow to its tenants, as well as a great loss to our city (San Francisco's unique character comes from all the strata of its citizenry). A young lawyer (and former schoolmate of mine) who was living there at the time took up the cause and miraculously prevailed against the Goliath of Metropolitan Life (and became a local hero). Surely, what prevailed here was the understanding that neither Parkmerced's tenants nor the city of San Francisco could afford to lose the singular opportunities and advantages that Parkmerced provided for many of our citizens. As you know, part of the current owners' plan is to offer *some* units for sale. How many is *some*?] 44.1
How much bigger can it get and still be only *some*? [And what will be the effect of these condos on 44.2
the rent-control feature of the complex that is a matter of survival for fixed-income tenants, whether aged, infirm or something else?] Is the ultimate goal to do what Metropolitan Life failed to do some four decades ago? In short, do we really want to allow these people to undo the good work of our local hero that has benefited, and could continue to benefit, generations of San Franciscans?

In the 1970s, with a growing influx of people and a housing market spiraling out of control, The City That Knows How began to forget "how." Young couples starting out in life found that landlords all over our fair city would not rent to anyone with children. This was more than a local, or even national, disgrace; we first read about it in the European edition of *Time* magazine! And when we came back home with a baby, we found it to be all too true. But thanks to child-friendly Parkmerced, we were able to stay in our hometown. These were the infamous Leona Helmsley years, "the Queen of Mean," a period that seemed bad at the time, but that we now look back on with nostalgia as comparatively harmless. For when Carmel Partners purchased Parkmerced in a takeover apparently so hostile that they were literally locked out (and had to replace the thousands of locks and keys to every front and back door of the complex), their plan soon became all too clear: eliminate all but the most basic services, get rid of the "expensive" workmen—plumbers, painters, electricians—and replace them with often comically inept handymen, reduce security to a minimum, and limit maintenance by discouraging requests for it (we couldn't even call them on the phone anymore); pretentiously rename the blighted complex The Villas Parkmerced; then sell it and, with the profits made possible by this planned degradation, leave town. And that is exactly what they did. After more than doubling their money in six years, they went back home with their suitcases full of cash, never to be heard from again—which brings us to another important point.

San Francisco has had the reputation of not being a business-friendly city, a reputation that we must admit has too often been justified. We frequently make it very difficult for businesses to set up shop here—businesses like film and TV companies, for example, which benefit the city in a variety of ways—and then we're surprised when they go elsewhere. But every now and then, with the ineptitude of a city that has never known how, we allow unconscionable outsiders like Carmel Partners to come into San Francisco and get rich by destroying a piece of our heritage—just to show the world that San Francisco is a business-friendly city! (Think back on the rise of the view-killing Fontana Towers and the fall of the priceless, ornate Fox movie theater. A city that is willing to sell off its heritage piece by piece to stay afloat financially no longer knows how.) During the Carmel years, a member of the Board of Supervisors (and former colleague of mine) told me that the pile of complaints from Parkmerced on his desk was always a foot high. Yet nothing was ever done to rein in the wholesale degradation of Parkmerced by that company. (I was told that a certain "business-friendly" mayor agreed to look the other way.)

Then Stellar Management came in full of sweet-sounding promises to restore Parkmerced's former glory, but apart from answering our calls again (and removing the hated "Villas" from the name), they haven't lived up to their promises. They have, however, further eroded Parkmerced's special character: security is now virtually nonexistent, and the decision to allow pets—not to throw out a mean-spirited policy, but to charge tenants extra for having pets—has had largely negative consequences. The presence of so many cats and dogs (some of which I swear are small horses) has made the neighborhood unsafe for birds and little children, so that Parkmerced is now the one thing we thought it never would be: kid-unfriendly. In other words, the current owners have followed the pattern established by Carmel Partners of realizing profits by degrading the property. Now they want to go a step further and destroy the property. Parkmerced, however, is not suburbia; there is no sprawl here. Tripling the number of tenants will not *concentrate* a scattered population, but only *add* to the total. Furthermore, we already have virtually all of their proposed "innovations" in one form or another in Parkmerced (or nearby), including a shopping center, which is off to one side, where it belongs. Parkmerced is a *residential* community; a "commercial core" would run counter to its character. Worst of all, though, is their idea of rerouting the M streetcar to run right through the middle of the neighborhood. (Have you ever lived on a streetcar line? There's an earthquake every 15 minutes!) The M car is already conveniently close to Parkmerced, where it runs on a six-lane highway that can easily absorb the noise pollution it creates. In short, their proposals are so extreme that they would require amendments to both the City Planning Code and the *General Plan*, that is, our city's self-image, an image that is epitomized by Parkmerced's peaceful, bucolic setting. The picture their plan conjures up with its high density, bustling commercial core and noisy transit terminal resembles nothing so much as...Manhattan! In the mini-Metropolis they want to put up on our paved-over paradise, our "little house," which sits firmly on the ground (and is illuminated by natural light), and from which we can look out any window and see the sky, would become a "ticky-tacky little box" lost in shadow as if at the bottom of a well (and have to be illuminated artificially). Either that or a box higher up the stack like Manhattanite Cole Porter's "my little room on the hundredth floor." If there is yet little resistance to this project, that may be due in part to the environmental generation gap mentioned above, or simply to a lack of information. But among Parkmerced's tenants, brutalized by so many years of abuse and neglect, there is also a dispiriting lack of will.

Another supposed parallel between Parkmerced and suburbia is the concept of the bedroom community, the notion that our home is just a place to sleep, while we actually live in the city. This noxious idea equates life with work and sees human society as a beehive: worker bees forced to labor abroad all day and paternalistically provided with a dormitory cubicle for the night. What's next? Coffin-sized drawers to sleep in like the ones at airports for weary business travelers? Our home is not just a bedroom; it is our world, and must therefore be built on a human scale. Yet self-styled experts now blithely proclaim that we'll just have to forget that outmoded world "where everyone has his own space." Wielding environmento-babble like a club, they are now targeting the western half of San Francisco, that quiet, low-lying half where single-family homes predominate. Worse, these high-density advocates eager to impose an impoverished life-style on us seem scarily unaware that this type of large-scale social engineering is the sort of thing they do in collectivist societies. The stacks of little boxes that Stellar Management wants to build in Parkmerced are a giant step in that sinister direction. They are also a complete reversal of the fundamental principles of the modern environmental movement that began a generation ago (see opening paragraph).

To sum up, Stellar Management's project is an environmentalist's nightmare. It would alter irreparably the character of one of our city's environmental jewels. Parkmerced is not a slum that needs to be razed to make way for something new. It is a vital community in the prime of its life that offers San Franciscans a housing alternative that can be found nowhere else. But it can be seen clearly from the short history recounted above that a profound change has taken place in our vision for the Parkmerced property. From its war-time beginning through the Helmsley years, Parkmerced was treated and managed like a living community, to the benefit of both its tenants and the city. But with Carmel Partners, Parkmerced became a sort of fast-buck op: buy it, degrade it, "flip" it and leave, with double your money. Despite their cunning use of buzzwords like "sustainability" and "green," the only thing of that color the current owners are interested in is the greenback dollar, the only "ability" they want is profitability, and the only thing they will "contribute" to our city is an overpopulated eyesore. Manhattanization is not the figment of an alarmist's imagination; it is a looming reality that we can forestall. San Francisco is our city. We can do whatever we want to preserve its character. We don't have to allow outsiders (or insiders, for that matter) to make their fortune by destroying a valuable piece of our heritage just because they own the property. There are legitimate ways of preventing that from happening (zoning laws, landmark status), and when the traditional character of our city is at stake, we should not hesitate to use them. We did just that in the case of Metropolitan Life's attempt to condominiumize this community and showed the world that we really did know how. The Draft Environmental Impact Report may show the project to be a model of sustainability, but that only matters if the project has merit. A complex of rabbit hutches might be a model of sustainability. The EIR gives a micro-view of the project, but it fails to capture the big picture. It focuses on a few green trees, but it misses entirely the spectacular forest, namely, the incomparable, irreplaceable Open Space that is Parkmerced.

44.3

With sincere thanks for your kind attention,

Kenneth Cervisi

Kenneth Cervisi & Family
222 Cardenas Avenue
San Francisco, CA 94132-2420
Tel/Fax: (415) 584-2032
E-mail: comoff@pacbell.net

RESPONSES TO LETTER 44

Kenneth Cervisi & Family, July 7, 2010

Response 44.1

The comment inquires about the specific number of for-sale units planned for the Proposed Project. This is not an environmental comment and therefore not addressed in the Draft EIR.

Response 44.2

The comment inquires about the Proposed Project's impacts on rent controlled units. Please see Responses TR.20.2 and TR.20.3, in Section III.B, Public Hearing Comments and Responses.

Response 44.3

The letter as a whole and this comment specifically express general opposition to the Proposed Project but do not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

RESPONSE TO DRAFT E.I.R. REGARDING PARKMERCED PROJECT

By Marc Christensen
60 Kempton Avenue
San Francisco, CA 94132
415-585-2465

RECEIVED

JUL 7 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

I am a third generation San Franciscan, living in the Merced Extension Triangle, located across Junipero Serra Boulevard and Brotherhood Way, just to the immediate south-east of the Parkmerced Complex. The one noticeable thing about the Draft EIR is that the study does not include the Merced Extension Triangle, despite its close proximity to the Parkmerced Project in question.

45.1

There is no indication anywhere in the Draft EIR that the identified topics being evaluated will have any impact on the adjacent Merced Extension Triangle, bounded by Juipero Serra Blvd. to the west, Brotherhood Way to the north, and Interstate 280 to the south and east--this, despite the fact that a least five additional towers will be placed in close proximity to residents living in the Merced Extension Triangle.

I am particularly concerned about the proposed zoning height limit plan (Figure III.9) that shows a height limit of 145 feet at the southeast corner of Parkmerced. This is out of scale with the existing site as well as the neighborhoods that border Parkmerced.

45.2

The Merced Extension Triangle Neighborhood Association Executive Board in July, 2009 issued the following statement with regards to the Parkmerced Project:

“We support the proposed improvements for housing and retail, however we have major concerns regarding the size and scope of the Project as it relates to the overall infrastructure, parking, traffic, sewers, water, electricity, views, as well as other related issues. We want mitigation measures in place to address any significant environmental effects. We oppose, at this time, any amendments to the Planning Code Height and Bulk Maps.” The position of the Merced Extension Triangle Neighborhood Association remains unchanged. The Draft EIR brings up new issues that were previously not brought to the attention of the public by the Developers. These issues will be addressed later in my comments.

45.3

In the Draft EIR (page V.B. 29) it states, “The visual character of the Project site would become denser and more urban.” “From public streets and parks to the east and north of the Project Site, expansive distant views over the rooftops of intervening houses toward the Parkmerced Complex and to the coastal dunes and Pacific Ocean beyond would continue to be available with implementation of the Proposed Project.” This is not entirely true. It is only when one reaches near the crest of the hill near Brooks Park to the east that someone would see the Ocean. The proposed towers would block ocean views near the halfway point on the hill. To the southeast at the Merced Extension Triangle, which includes OceanView Village, some residents would lose their ocean views. As stated in the next paragraph (page V.B. 29) all residents in the entire Merced Extension Triangle, even though not mentioned by name, would be severely impacted by the 145 foot towers: “Construction of the Proposed Project could interrupt or alter existing private views to the extent that such views are available....from some of the residences to the east of the Project site.” “The alteration or interruption of private residential views for some nearby residents would be an unavoidable consequence of the Proposed Project and may be an undesirable change for some individuals. A project

45.4

45.5

would only be considered to have a significant impact on scenic vistas if it were to substantially degrade or obstruct public scenic vistas observed from public areas. Therefore, changes to private views resulting from the Proposed Project would not be considered a potentially significant impact as defined by CEQA.” Therefore, in the eyes of the Planning Department, through CEQA, any developer can come in to a neighborhood and drastically alter the scenic vistas of existing individual homes and entire neighborhoods.

45.5
cont

45.6

The tall buildings slated for the southeast corner of the property, according to the wind study will have a negative impact on the Merced Extension Triangle Neighborhood, located to the south and east. “Increased wind speeds are predicted for the areas at the southeast corner of the site, near Chumasero Drive and Brotherhood Way, as well as near Junipero Serra Boulevard. Mitigation concepts have been described.” The listed mitigation measures appear to be inadequate and unrealistic. There is also no mention of the fog patterns that converge on the area throughout the spring and summer months.

45.7

45.8

“Large buildings tend to intercept the stronger winds at higher elevations and redirect them to ground level. Such a Downwashing Flow is often the main cause for wind acceleration at the pedestrian level. Wind acceleration typically occurs at the corners of tall buildings where the downward wind passes around the edges of the building. When two buildings are situated side by side, wind tends to accelerate through the gap between the buildings due to a Channeling Effect. If these building/wind combinations occur for prevailing winds, and especially strong winds, there is an increased potential for the accelerated winds to create wind safety issues for pedestrians.”

45.9

The only realistic mitigation measure would be to not build the 145 foot proposed towers at or near Chumasero Dr. and Brotherhood Way.

Impact AE-4 “The proposed wind turbines would be a prominent new visual feature on the western perimeter of the project site.”

This proposed project is listed as “Less than Significant.” How is that determination made? 51 turbines, 3 foot wide and 100 feet tall is not less than significant. If that statement is true, then the turbines should be placed at the interior of the Parkmerced Property where residents who will benefit from the energy will enjoy their “less than significant” visual feature.

Having 51 wind turbines running approximately 2,040 feet along the western edge of the Parkmerced Property, and on the eastern edge of Lake Merced Blvd. will be a visual eyesore added to a beautiful boulevard. The only visual feature directly to the east of Lake Merced Blvd. should be trees and plantings that will superficially block out the high rises that are planned for the western edge of the Parkmerced Property.

45.10

The Draft EIR states, “...when the line of wind turbines is viewed obliquely (i.e., where the line of sight is at an acute angle to the line of wind turbines) the turbines would appear to be more closely spaced. If the view is at an extremely acute angle, the wind turbines could together take on an almost solid wall-like appearance.” This is exactly what motorists and pedestrians would see walking and driving on Lake Merced Blvd. The report claims, “These views are not considered visual or scenic resources.” The report further concludes, “Views of Lake Merced from Lake Merced Blvd. are likewise screened by a cover of mature vegetation between the lake and Lake Merced Blvd. For these reasons, the proposed wind turbines would not have a significant adverse impact on

the scenic resources, visual quality and scenic vistas. Therefore no mitigation measures are required.”

You have got to be kidding? I argue that this Impact (AE -4) is “significant, avoidable and unacceptable.” Any thought of turbines, and I question 100 foot tall turbines, should be placed in the center of the project for the enjoyment of those who will benefit from their use. The visual impact should not be thrust upon the general public who will not benefit from their use.

45.10
con't

The wind turbines will have a very negative effect on a variety of birds, including migratory birds that use the Lake Merced watershed. Surprisingly, there is no mention of this in the Draft EIR.

45.11

The wind turbines are not silent and their placement will have a cumulative negative sound impact on pedestrians who use the popular walking/jogging path around the eastern edge of Lake Merced and Harding Park. That along with the expected increase in noise from traffic is not a welcomed addition either.

45.12

Impact PH-4. The Proposed Project would not induce substantial population growth in an area either directly or indirectly.

This impact is listed as “less than significant.” As stated in the report, “full occupancy of the 5,679 additional residential units on the Project Site would increase the existing on site residential population from about 7,340 people to about 20,290.” This is close to triple to current population. Any increase of 100% should be deemed “significant” and an increase of over 175% will certainly impact the major infrastructures of the surrounding neighborhoods, especially roadway ability to accommodate the overall increase in traffic, not only from the project, but also from the projected Citywide population growth.

45.13

With regards to traffic and circulation, both the 19th Avenue Corridor Study and the Draft EIR confirm that intersections along 19th Avenue from Juipero Serra Blvd. to Sloat Blvd and intersections along Lake Merced Blvd. currently operate at unacceptable conditions and will do so at a higher impact, once the various phases of the Parkmerced Project are completed. Weekday AM peak hour intersections operating at unacceptable levels of service would increase from the existing 7 intersections to 11 intersections, weekday PM peak hour from the existing 11 intersections to 19 intersections, and even on weekend midday peak hour from an existing 3 intersections to 6 or possibly 7 intersections. The best mitigation measure would be to look at the size and scope of the project. It appears that building the additional units, for a grand total of 8,900 units when completed, will overwhelm the traffic corridors surrounding Parkmerced. A compromise should be reached so as not to drastically impact traffic in the immediate area forever. Even with a reduction in planned units a serious impact will be felt.

45.14

The Parkmerced Project poses too many “significant” impacts without mitigation and then when one reads the mitigation measures proposed the impact becomes “significant and unavoidable.”

45.15

Throughout the report a disturbing trend exists under “mitigation measures.” “SFMTA has not determined the feasibility of this mitigation. Because this mitigation measure would require further evaluation, its implementation is uncertain. Therefore, the Proposed Project’s contribution to the cumulative impact at this intersection would remain significant and unavoidable.”

45.16

Also, "Implementation of the mitigation measures above that would require discretionary approval actions by the SFMTA or other public agencies (Caltrans) is considered uncertain because public agencies subject to CEQA cannot comment to implementing any part of a proposed project, including proposed mitigation measures, until environmental review is complete. Thus while SFMTA has reviewed the feasibility of several mitigation measures proposed to address significant impacts, implementation of these measures cannot be assured until after certification of the EIR."

45.16
con't

What assurances are there that the proposed mitigation measures, or for that matter the best alternatives will be implemented? Thus, time and again the response to each impact will be "significant and unavoidable."

With regards to specific impacts and the proposed mitigation measures, I submit the following comments:

M-TR-1 A Construction Traffic Management Program is a must. Part of this program plan should have a component to give residents of neighboring streets, along with representatives at San Francisco State University and Lowell High School, as well as the Taraval Police Station and the Department of Parking and Traffic, weekly and monthly traffic impact reports related to construction activities and construction traffic. There should be a mechanism in place for community organizations as well as public entities to meet periodically to discuss adjusted mitigation measures when significant construction related transportation impacts occur or are about to occur. Public information and input is crucial.

45.17

M-TR-2A I agree with the finding.

M-TR-2B With regard to a traffic signal at Sunset Blvd/Lake Merced Blvd. there is no indication that the intersection would improve to "acceptable LOS D or better in the PM peak hour."

45.18

M-TR-2C I agree with the finding. This would be an improvement.

M-TR-2D The proposal has merit, except for the removal of parking spaces. An alternative would be to widen the roadway to allow turn lanes while keeping the existing parking.

45.19

M-TR-2E Again, widen the right of way to accommodate this proposal.

45.20

M-TR-5 A southbound travel lane that allows for both traffic to use it when no transit vehicle is in the vicinity and then becomes a transit lane only (with a series of flashing red lights, above on the Muni Metro poles extended out over the roadway or imbedded in the roadway, along the lane route) to signal "only transit vehicles allowed," when a bus or Metro car enters the lane would be the optimal choice. Therefore, during the significant amount of time when transit vehicles are not present, perhaps 80% of the time, automobiles would be allowed to use the fourth lane. When the lights are flashing automobiles would have to immediately exit the transit lane.

45.21

M-TR-9 (a) Opposed to this mitigation measure. This proposal needs to be evaluated further and discussed. An additional signal (eastbound turn signal) added to westbound Brotherhood Way would cause further backups along Brotherhood Way. Very few cars use the eastbound Brotherhood Way ramp to northbound Junipero Serra. Leave it as is.

45.22

(b) However, widening northbound Junipero Serra Blvd. from Alemany Blvd. to Brotherhood Way would provide a wider dedicated right turn lane off Junipero Serra at Palmetto, better access from Palmetto (right turn) on to Junipero Serra (currently too

narrow and dangerous; needs to be widened by approximately two to four feet). This fourth northbound curb lane just past Palmetto would serve as a safer entrance lane on to Junipero Serra and further north it would serve as an exit lane to westbound Brotherhood Way. A proposed additional lane on Brotherhood Way from the Junipero Serra turnoff to Chumesero could be added.

45.22
con't

M-TR-21A An additional light rail vehicle is a must.

45.23

M-TR-21B Preferred alternative. It is a must that transit time not be lengthened for residents living south and east of Parkmerced and that headways between light rail vehicles be under 10 minutes during peak times south and east of Parkmerced. Turning back every other light rail vehicle at Parkmerced should not be an option.

45.24

M-TR-22A This needs to be studied further, prior to implementation. It is agreed to that traffic flow along lake Merced Blvd. and Brotherhood Way must be improved, especially during AM and PM peak travel times.

45.25

M-TR-23 The SFMTA-TEP proposes that the 17-Parkmerced bus be rerouted to connect with Daly City BART, and the Westlake Shopping Center. It would replace the existing 18-line around lake Merced via John Muir Drive and Skyline Blvd. The 17-line would connect with Lakeshore Plaza. It would also connect with Lakeside Village (Ocean Avenue) and would continue to serve Stonestown and West Portal Shopping areas to the north-cast. This would be an excellent addition, linking five key shopping centers to residents along the route, and to Daly City BART as well. This plan should definitely be included in the Parkmerced Project.

45.26

Furthermore, the suggestion of a fourth northbound high occupancy vehicle, toll and transit only use lane would cause many motorists to use northbound Junipero Serra from 19th Avenue to either Ocean Avenue or Sloat Blvd, further impacting Junipero Serra and the left turn lanes taking the through northbound traffic back to 19th Avenue. A northbound fourth lane combination of vehicles and transit could and should be utilized. (See proposal under M-TR-5).

M-TR-25A and 25-B See proposal under M-TR-5. This makes the most sense since it maximizes the use of the fourth lane, while still providing transit with a lane.

45.27

M-TR-26 Further discussion with SFMTA needs to take place with regards to changes along Lake Merced Blvd., especially if it involves the elimination of existing parking spaces along the corridor.

45.28

M-TR-36A and 36B It is unlikely that giving more "green time" to east-west traffic movements would "achieve acceptable levels at these intersections, especially at 19th Avenue/Holloway and 19th Avenue/Winston. Traffic along the 19th Avenue corridor would adversely be affected. This should qualify as totally "unacceptable" and "significant."

45.29

M-TR-36C I agree with this proposal. This should be tied in to M-TR-9 - (b) the widening of northbound Junipero Serra from Alemany to Brotherhood to provide a dedicated right turn lane from just north of Palmetto through the westbound Brotherhood Way ramp. This mitigation measure should be first and foremost as traffic currently backs up well before Alemany Blvd, northbound on Junipero Serra, to exit at the westbound Brotherhood Way ramp, during peak AM and PM commute times.

45.30

M-TR-36D There is no reason to believe that installing a traffic signal at the intersection of Lake Merced Blvd/John Muir Drive will have significant impact on traffic flow through the area. A signal may be needed for traffic to enter and exit John Muir

45.31
↓

drive, however it would adversely affect traffic flow on Lake Merced Blvd. in both directions. This mitigation measure has some merit if traffic patterns increase to the point that traffic entering and exiting John Muir is significantly delayed.

45.31
con't

M-TR-36E This proposal has merit, especially if traffic patterns will increase significantly to traffic flow to John Daly Blvd. and beyond.

45.32

M-TR-36F Installation of an auxiliary lane northbound on Lake Merced Blvd. from Brotherhood Way to Gonzalez Drive and also extending this lane to Font Blvd. makes good sense. Along with the proposal in M-TR-9 – (b), this mitigation measure should be first and foremost as traffic is currently heavily impacted during AM and Pm peak travel times, and while San Francisco State University is in session.

45.33

M-TR-44 Due to the size and scope of the proposed project a “Transit Impact Development Fee,” a “fair share” contribution tied to the Parkmerced Property Taxes is a viable way to fund “additional transit service.” This supplemental tax should be written in such a way that it can only be used for additional transit service serving the Parkmerced complex (e.g. M-Line, possible J-line extension, 17, 18, 28, 29-lines and any future transit lines served by SFMTA).

45.34

Furthermore, and not contained in the Transportation and Circulation Mitigation Measures, as far as I could see, is Parkmerced’s request to have left turn lanes and cross traffic entry lanes added at Chumsero Drive and Junipero Serra. Absolutely no left turn lanes or signals should be added to Junipero Serra Blvd. or 19th Avenue into or out of the Parkmerced Complex. This would significantly add to LOS F southbound on both 19th Avenue and Junipero Serra Blvd. Additionally, no exit from Parkmerced on to northbound at any point should be considered. Allowing that would further backup traffic both southbound and northbound on Junipero Serra and southbound on 19th Ave. near Junipero Serra.

45.35

45.36

Having the M-Oceanview Metro Line enter and exit Parkmerced by crossing 19th Avenue and Junipero Serra at street level is a “significant and unavoidable” delay that could be corrected. Undergrounding (favorable) or elevating (less favorable) of the Muni Metro line across Junipero Serra at 19th Avenue should be listed as a possible mitigation measure, especially in light of the fact that significant money will be spent bringing the M-Metro Line into and out of Parkmerced. Over the life span of this improvement, the cost would be minimal and provide for uninterrupted traffic flow on 19th Ave. and Junipero Serra Blvd. This mitigation measure should be part of the overall Parkmerced-SFMTA Muni Metro Plan.

45.37

I hope the Planning Department will give serious consideration to the points raised related to my comments concerning the Draft EIR. These have been presented in the spirit of mutual respect for the EIR process and the work being done by all parties connected to the work on the Parkmerced Project.

I look forward to meeting with any and all parties to discuss, implement or amend my suggestions.

RESPONSES TO LETTER 45

Marc Christensen, July 7, 2010

Response 45.1

The comment notes that the Merced Extension Triangle is not included in the analysis of the Draft EIR.

Section V.A, Land Use, pp. V.A.5-V.A.6, describes the land uses that are adjacent to the Project Site. The Ocean View District is described as “generally the area bounded by Junipero Serra Boulevard on the west, Ocean Avenue on the north, and Interstate 280 on the east and the south. The Ocean View District includes the Ingleside, Ingleside Terrace, Merced Heights, and Ocean View neighborhoods, all of which are characterized primarily by detached single-family homes.” Although some, but not all, of the neighborhoods in the Ocean View District are listed, this geographic area includes the area known as the Merced Extension Triangle neighborhood.

The Land Use section, pp. V.A.10-V.A.13, also describes the Proposed Project’s impacts on existing land uses in the Project Site vicinity and on the land use character of the vicinity. As explained above, the vicinity includes the Merced Extension Triangle neighborhood in the Ocean View District.

Please refer to Responses 45.4 and 45.5 for a discussion of the Proposed Project’s impacts on public and private views from the Merced Extension Triangle neighborhood.

Response 45.2

The comment asserts that the proposed height limit plan is out of scale with the existing site and adjacent neighborhoods. This comment does not address the adequacy or accuracy of the analysis presented in the Draft EIR. The comment’s opposition to the proposed height limit plan may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 45.3

The comment requests mitigation measures to address any significant environmental effects. The Draft EIR identifies all potentially significant and significant impacts and provides mitigation measures, where appropriate. Please see Response 13.1.

Response 45.4

The comment asserts that the Proposed Project would obstruct views of the ocean from halfway up the hill, the crest of which is occupied by Brooks Park and that some residents would lose their

ocean views. The view from Brooks Park (Figure V.B.11: Viewpoint J – View Looking West from Brooks Park, p. V.B.19, in Section V.B, Aesthetics) was selected for inclusion in the EIR because it is an expansive scenic vista over the Project Site that is available from a public space. The hillsides down-slope from Brooks Park do not offer expansive scenic vistas of the ocean over the project site that are visible from publicly accessible vantage points. Instead, public views from these streets are obstructed or constrained by the existing attached rowhouses that line the streets.

The comment states that the Proposed Project would block ocean views from some residences. The EIR addresses the project's impact on private views. It states that the Proposed Project could alter or interrupt existing private views; however, it also states that "a project would only be considered to have a significant impact on scenic vista if it were to substantially degrade or obstruct *public* scenic vistas observed from public areas" (p. V.B.29) (emphasis added). Impacts on private views would therefore not be considered significant environmental impacts under CEQA.

Response 45.5

The comment states that residents of the Merced Extension Triangle would have their views impacted as the result of the Proposed Project. Please see Response 45.4 for a discussion of impacts to views.

Response 45.6

The comment states opposition to the Proposed Project, particularly impacts to scenic vistas from homes and neighborhoods. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project. Please see also Response 45.4 for a discussion of impacts to views.

Response 45.7

The comment states that the wind mitigation measures are inadequate, but does not provide any evidence or explanation as to why these mitigation measures are inadequate or unrealistic.

In Section VI, Wind and Shadow, on pp. VI.9-VI.10, the EIR describes feasible mitigation and improvement measures that could be implemented to mitigate significant wind impacts of the Proposed Project. As stated at the top of p. VI.9, implementation of Mitigation Measures M-WS-1a and M-WS-1b would reduce some, but possibly not all, potentially significant and unavoidable wind impacts.

The mitigation and improvement measures identified in the EIR are feasible and could be implemented during the design phases of the individual buildings. Examples of potential design features that would mitigate wind impacts are discussed on pp. V.I.14-V.I.16.

Response 45.8

The comment states that the EIR does not mention the fog patterns that occur during the spring and summer.

The Project Site, like much of San Francisco, is generally foggy during the spring and summer months. Fog has little to no impact on wind speeds, but may affect pedestrian comfort. The presence of fog results in cooler temperatures, which may be perceived as less comfortable than warmer temperatures on a clear day. Pedestrian comfort, however, is not the criterion that is used to determine if the Proposed Project would have significant wind impacts under CEQA. The existing fog and wind conditions are considered part of the environmental baseline for the purposes of CEQA and the Draft EIR analysis. Section V.I, Wind and Shadow, p. V.I.4, states that the Proposed Project would have a significant wind impact if it resulted in a substantial increase in the number of hours that the 26 mph wind hazard criterion is exceeded or a substantial increase in the area subjected to winds greater than 26 mph. Since fog has little to no impact on wind speeds, the conclusions regarding the Proposed Project's wind impacts would not change as a result of considering the fog patterns that occur during the spring and summer.

Response 45.9

The comment states that some of the proposed towers could cause wind speeds that would endanger pedestrians and that the only feasible mitigation measure is to not construct the proposed 145-foot-tall towers in the southeast corner of the Project Site.

Pedestrian safety would be addressed through implementation of the mitigation and improvement measures described in Section V.I, Wind and Shadow, on pp. V.I.9-V.I.10. Downwashing wind flows can be minimized or eliminated by incorporating podiums and roof terraces into building designs. These horizontal "shelves" can divert downward winds away from streets and sidewalks. Winds that channel between buildings can be slowed by sculpting buildings so that their facades include multiple changes in plane (bay windows, setbacks, etc.). Reorienting and relocating buildings can minimize or eliminate downward or channeled wind flows, and landscaping (latticework, screens, vegetation) can be effective in reducing wind speeds. All of the design features listed above may be incorporated as the individual buildings are designed in accordance with the wind mitigation provided in Section V.I.a, Wind, pp. V.I.9-V.I.10.

Response 45.10

The comment questions the determination that the proposed wind turbines would have a less-than-significant visual effect. Please refer to Response 17.12.

Response 45.11

The comment states that the Draft EIR does not address impacts the proposed wind turbines would have on birds. A discussion of adverse effects from wind turbines on bird and bat movement and migration corridors is in Section V.M, Biological Resources, pp. V.M-30-V.M.34.

Response 45.12

The comment expresses concerns about the noise effects from wind turbines. The proposed wind turbines would introduce new stationary sources of noise (see Impact NO-7 in Section V.F, Noise, p. V.F.32, and Mitigation Measure M-NO-7, p. V.F.34), as noted by the comment. Although detailed noise specifications are not available due to the preliminary nature of the proposal, the wind turbines would be required to comply with the San Francisco Noise Ordinance, as detailed on p. V.F.33.

Response 45.13

The comment asserts that the increase in population as a result of the Proposed Project is a significant impact. Please refer to Response 17.4.

Response 45.14

The comment states that the scope of the Proposed Project should be reduced in order to reduce traffic impacts. This comment summarizes findings and conclusions from the DEIR, detailing the potential significant traffic-related impacts associated with the Proposed Project. The comment suggests reducing the size of the Proposed Project in order to alleviate traffic congestion. Chapter VII, Alternatives to the Proposed Project, of the EIR contains alternatives to the Proposed Project, including alternatives with less development and reduced traffic impacts. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response 45.15

The comment states that the Proposed Project results in too many significant impacts. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for a discussion of the number of significant and unavoidable impacts

described in the EIR. This comment may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response 45.16

The comment identifies that several mitigation measures were included in the Draft EIR where there is some question regarding feasibility and asks what guarantees will be in place to ensure that mitigation measures are implemented.. Prior to approval of the Proposed Project, a Mitigation Monitoring and Reporting Program (MMRP) will be developed that describes which mitigation measures are considered feasible, who would be responsible for implementation, and the implementation timing. Additionally, mitigation measures are generally imposed as conditions of approval of the project approved by decision-makers. However, because of the uncertainty of implementing recommended mitigation measures, the impacts are identified as significant and unavoidable with implementation of the Proposed Project. See also Master Response A.2, Transportation and Circulation, Section 3.3, regarding the feasibility of mitigation measures.

Response 45.17

The comment requests that the public have an opportunity to get monthly updates on construction traffic management activities. This comment is not a CEQA issue and does not need to be addressed in the Draft EIR.

Response 45.18

The comment states that there is no indication that LOS of the Sunset Boulevard and Lake Merced Boulevard intersection would improve as a result of Mitigation Measure M-TR-2B. The intersection level of service with implementation of M-TR-2B is summarized in the Transportation Impact Analysis Report and the detailed intersection level of service calculations are provided in the Transportation Impact Analysis Report Technical Appendix. These indicate that LOS at this intersection would improve as a result of the identified mitigation.

Response 45.19

The comment identifies that Mitigation Measure M-TR-2D has merit, but not if it removes parking spaces, and suggests roadway widening instead. The improvements described as part of Mitigation Measure M TR-2D are the minimum amount of change to the existing roadway configuration that would mitigate the significant impact on level of service to a less than significant level. If feasible, the improvements could be constructed within the existing curb-to-curb right of way without substantial roadway widening and increases to pedestrian crossing distances. If parking were retained and the improvements suggested as part of M TR-2D were

implemented through widening as suggested by the comment, the pedestrian crossing distances would be increased. Therefore, the mitigation measure, as proposed in the Draft EIR, is considered preferable by SFMTA and the Planning Department to the alternative solution proposed by the comment.

Response 45.20

The comment suggests widening the right of way to accommodate Mitigation Measure M-TR-2E. Preliminary studies have shown that M-TR-2E could be constructed within the available right of way and widening is unnecessary to reduce the impact to less-than-significant levels.

Response 45.21

The comment suggests a transit only southbound lane on 19th Avenue when buses are present only. The solution proposed by the comment would present a number of operational challenges. As transit vehicles approach, traffic in the fourth southbound lane would have to merge with traffic in adjacent lanes to clear the lane for transit vehicles. This would likely lead to substantial short-term congestion as an entire lane of traffic attempts to merge into the adjacent lane at once. Based on existing schedules, this would occur approximately every four minutes in the AM peak hour, for example.

This merging traffic would likely have to stop to wait for an opportunity to merge into the adjacent lane, and as a result, could disrupt transit more than if the lane operated mixed flow at all times. Therefore, the mitigation measure, as proposed, is considered preferable by SFMTA to the alternative solution proposed by the comment.

Response 45.22

The comment expresses opposition to and requests further evaluation of Mitigation Measure M-TR-9. The comment notes that further evaluation and discussion of M TR-9 is needed. This is consistent with the discussion in Section V.E, Transportation and Circulation, pp. V.E.78-V.E.79, which notes that additional analysis and approvals would be required to determine feasibility. The comment also suggests that the mitigation measure as proposed would cause additional delay along Brotherhood Way due to a new signal; however, M TR-9 does not propose a new signal. Instead the new westbound left-turn movement would have to yield to oncoming traffic and would have virtually no effect on westbound traffic. The technical analysis included in the *Transportation Impact Analysis Report* Technical Appendix shows that the intersection levels of service at this intersection would be within acceptable thresholds.

The alternative mitigation measure proposed by the comment would involve substantial roadway widening and reconstruction of the bridge on Junipero Serra Boulevard over Brotherhood Way.

This improvement would be substantially more expensive than the proposed mitigation measure and has similar feasibility issues to the recommended mitigation measure. The recommended mitigation measure proposed by the Draft EIR, if feasible, would adequately mitigate project-related impacts to less than significant levels. Therefore, the mitigation measure, as proposed, is considered preferable to the alternative solution proposed by the comment.

Response 45.23

The comment states that an additional light rail vehicle is needed for Mitigation Measure M-TR-21A. This comment expresses general support for M-TR-21A. It should be noted that M TR-21B would also mitigate the Proposed Project's impact to travel times on the M Ocean View and as discussed in the DEIR, would be preferable to implementation of M TR-21A. See Response 45.24, below.

Response 45.24

The comment expresses general support for Mitigation Measure M-TR-21B. It should be noted that this mitigation measure would mitigate the Proposed Project's impacts to travel times on the M Ocean View light rail line without the need for additional vehicles, and as discussed in the EIR on p. V.E.89, this measure would be preferable to M-TR-21A.

The comment also expresses concern for the proposal to turn back every other M Ocean View train at Parkmerced and only continue some of the trains to the Balboa Park Station. This service plan is not part of M-TR-21B, but instead part of the service proposal developed in collaboration with SFMTA to optimize service in the area and is part of the Proposed Project. The plan to provide higher-frequency service to the north and less-frequent service to the east is based on existing ridership and forecasts of future ridership throughout the corridor. However, this comment expresses general opposition to the proposed transit service plan but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. This comment may be considered by decision-makers when determining whether to approve or disapprove the Proposed Project.

Response 45.25

The comment states that Mitigation Measure TR-22A needs further study and states that traffic flow improvements along Lake Merced and Brotherhood Way should be improved during peak periods. The comment notes that improvements listed under Mitigation Measure MM-TR-22A require further study, which is consistent with the discussion in the Draft EIR. The comment also expresses general support for M-TR-22A.

Response 45.26

The comment generally expresses support for the proposal included in the Transit Effectiveness Project (TEP) to reroute the 17 Parkmerced and 18 46th Avenue bus routes. Although rerouting is considered as part of the TEP, its implementation would not be precluded by the Proposed Project. Furthermore, the analysis summarized in the Draft EIR is generally valid for conditions with or without the proposed modifications to the 17 Parkmerced and 18 46th Avenue Muni bus routes.

The comment also expresses concern regarding secondary traffic impacts to Junipero Serra Boulevard associated with the implementation of transit-only lanes along 19th Avenue, as suggested by Mitigation Measure M-TR-23. (Although the comment references HOT lanes, in which private vehicles that wish to use the lane could do so for a fee, the proposal in Mitigation Measure M-TR-23 is for exclusive transit-only lanes. The comment is assumed to refer to the specific proposal in Mitigation Measure M-TR-23 for transit only lanes, and not for HOT lanes.) The EIR acknowledges these secondary impacts in the discussion following M-TR-23 in Section V.E, Transportation and Circulation, p. V.E.92.

Response 45.27

This comment reiterates a proposed alternate mitigation measure described in Comment 44.21. Please see Response 44.21.

Response 45.28

The comment correctly asserts that further discussion is needed for Mitigation Measure TR-26, especially if parking would be removed. This is consistent with the discussion in Section V.E, Transportation and Circulation, p. V.E.95.

Response 45.29

The comment suggests that signal timing improvements identified in Mitigation Measures M-TR-36A and M-TR-36B would not mitigate impacts. Mitigation Measures M-TR-36A and M-TR-36B would involve re-timing signals at Junipero Serra Boulevard/Ocean Avenue/Eucalyptus Drive and 19th Avenue/Holloway Avenue, respectively, to mitigate cumulative impacts to LOS at these intersections. Based on the technical analysis, which is presented in the Transportation Impact Analysis Technical Appendix, signal timing modifications could help achieve acceptable operations (i.e., LOS D or better during weekday AM and PM peak hours) under cumulative conditions. The comment provides no evidence to support the claim that the technical analysis is flawed. However, as noted in the Draft EIR, implementation of these signal timing modifications

is uncertain, and the cumulative impacts were therefore identified as potentially significant and unavoidable.

The comment also notes that signal timing improvements would not improve intersection operations at the intersection of 19th Avenue/Winston Drive. However, this intersection is not included in Mitigation Measures M-TR-36A or M-TR-36B. No feasible mitigation measures were identified for the cumulative impacts at this intersection, and the impacts were found to be significant and unavoidable.

Response 45.30

The comment concurs with Mitigation Measure M-TR-36C and suggests that this measure also be tied to Mitigation Measure M-TR-9. Mitigation Measures M-TR-36C and M-TR-9 are separate measures to mitigate separate impacts. They could each be implemented individually without precluding the other. Therefore, no linkage is required or necessary.

Response 45.31

The comment states that there is no reason to believe a signal at Lake Merced Boulevard and John Muir Drive would improve traffic flow, unless traffic increases to the point that traffic entering and exiting John Muir is significantly delayed. This intersection currently operates at unacceptable levels of service; however, traffic volumes do not satisfy warrants for installation of a new traffic signal. Long-term growth in traffic at the intersection of Lake Merced Boulevard/John Muir Drive is forecasted to cause the intersection LOS to deteriorate further, and cause the traffic volumes to meet signal warrant criteria. The primary movement at the intersection that would experience unacceptable delay is the eastbound movement from John Muir Drive onto northbound Lake Merced Boulevard. Although the installation of a new traffic signal would cause additional delay to through-traffic on Lake Merced Boulevard, the intersection would operate at acceptable levels of service. The supporting technical analysis is included in the *Transportation Impact Analysis Report* Technical Appendix.

Response 45.32

The comment expresses general support for Mitigation Measure M-TR-36E. No response is required.

Response 45.33

The comment expresses general support for Mitigation Measure M-TR-36F. No response is required.

Response 45.34

The comment asserts that a Transit Impact Development Fee (TIDF) and Fair-Share contribution should fund additional transit service. As noted in Section V.E, Transportation and Circulation, pp. V.E.105-V.E.115, the City's TIDF does not apply to residential projects. However, the Proposed Project would be required to contribute a "fair-share" contribution to mitigation measures for cumulative impacts to which the Proposed Project contributes, but does not individually cause.

Response 45.35

The comment states that Parkmerced's request to have left turn lanes and cross traffic entry lanes added at Chumasero Drive and Junipero Serra are not included in the Transportation and Circulation Mitigation Measures. These transportation changes are not mitigation measures because they are proposed as part of the project. Potential impacts of the Proposed Project, including these circulation changes, are analyzed in the EIR.

Response 45.36

The comment asserts there should be no left-turn access from 19th Avenue. The Project includes new northbound left-turn access from 19th Avenue into the Project Site at Crespi Drive and from Junipero Serra Boulevard into the Proposed Project Site at Chumasero Drive. Egress from the Proposed Project onto northbound 19th Avenue from Crespi Drive is currently allowed, and would continue to be permitted under conditions with the Proposed Project. Egress from the Proposed Project onto northbound Junipero Serra Boulevard from Chumasero Drive is prohibited and would remain prohibited under conditions with the Proposed Project.

The analysis included in the Draft EIR provides intersection LOS for each of these intersections, and the effect of this new access is presented. The EIR identifies that the proposed left-turn access from northbound 19th Avenue into the Project Site at Crespi Drive would cause a significant impact to traffic circulation. Mitigation Measure M-TR-2A would prohibit the construction of the proposed new left-turn access at Crespi Drive. Otherwise, the additional access locations disperse vehicular access to the to the Project Site than if all inbound traffic from northbound 19th Avenue were concentrated at a single intersection, such as 19th Avenue/Holloway Avenue, as currently configured.

Response 45.37

The comment asserts that having the M Ocean View crossing 19th Avenue is unacceptable impact, presumably to traffic circulation. Please refer to Response TR.31.2, in Section III.B, Public Hearing Comments and Responses, and Master Response A.2, Transportation and Circulation, Section 3.1, regarding the relationship between the Proposed Project, the EIR, and the *19th Avenue Corridor Study*.

To: pic@sfgov.org
From: LORENE NUGENT <lorenenugent@yahoo.com>
Date: 07/07/2010 09:58AM
Subject:

I am a resident of the GARDEN apartments in Parkmerced, and I do not want to live in a low to mid-rise apartment. I moved into my apartment because of the courtyard, and the fact that my door opens to the outside world, not a hallway.

I moved here so my son (and now my granddaughter) can easily go outside to play or I can say hello to a neighbor while I am sitting outside enjoying the beauty.

They call Parkmerced a "bedroom community," and somehow think that this is bad. If I wanted to live in an urban area with retail shops, and lots of congestion, I could move. We have everything we need close at hand. Public transportation is 2 blocks (or less) away, shopping is less than a mile away and they are gradually adding stores inside Parkmerced.

Parkmerced is unique, a green respite in the midst of a city, and that is a good thing. The last thing we need is another high density housing project.

I implore you to reject Parkmerced's planned destruction of our homes. No matter what they claim, they are not speaking on our behalf, they are only looking to maximize their profit margin.

46.1

RESPONSES TO LETTER 46

Leon Cowen, July 7, 2010

Response 46.1

This letter is essentially identical to Comment 43.1 and raises no environmental issues. Please refer to Response 43.1.

RE: Parkmerced Project

Letter 47

Dear Bill Wycko,

July 8, 2010
RECEIVED

Apologies for handwritten letter
No time for printing

JUL 09 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
M.E.A.

I am not experienced at commenting on EIR. So not sure if this is properly done.

I am adamantly opposed to this development project. Although innovative it is not in tune with the surrounding landscape.

In my opinion the negative far outweighs the positive for the following reasons.

It would be better off placed downtown where there is already high density.

① Over & over the project states ~~is~~ unavoidable & unmitigable

A few muni on Forto Chymasero
Wind turbines in the flight path of birds
at Lake Merced - height & bulk increases
as written on page 11.3

Suspension of digging for archeological
Digging for only 4 weeks - on page 11.5
is a desecration of the earth.

How are all these provisions for archeological
remains as on 11.6 enforceable?

There seems to be no mitigation to make
sure these rules are enforced.

11.20 & 11.21 - increased impacts
of traffic on 19th Ave - significant & unavoidable
because of various reasons. This is
not acceptable.

The final analysis shows

47.1

47.2

47.3

Re: Parkmerced Project

significant & unavoidable traffic at 19th & Lake Merced Boulevard. Why would this project be approved when even the mitigation measures are not sufficient.

47.3

11.21 - 11.22 - 11.23 11.24
Significant traffic impacts on 11.26 freeway segments

Increase of noise levels - One of the beauties of Parkmerced is the peace & quiet. Again no feasible mitigation - How does this noise increase affect the human soul. Most people in D.F. live in noisy places - They get no rest from the outer world. Parkmerced is peaceful like the country. How do you quantify that? You cannot

47.4

11.27 11.28 Traffic increase in noise

Air quality affected - no feasible mitigation - 11.33 This is not acceptable for people to be exposed to. Most of downtown is toxic. Our air is relatively clean. Why would you expose people to this? Not right.

47.5

Wind & shadow increase already fog & grayness are a huge problem here for months out of the year. Should not be approved. significant & unavoidable page 11.47. V.I. 13 V.I. 63

47.6

Aesthetics will be destroyed significant & unavoidable 11.47 This new development is not in tune with the landscape

47.7

RE: Parkmerced Project

11.46 Keeping the present project is the best alternative for the landscape - environmentally + this project is not a light carbon footprint. It clearly states in the EIR the best development is the best solution for the environment in spite of a few innovative aspects. VB29 Wind turbines in the flight path of birds - The no project alternative as stated in 11.51 is the best alternative for the environment.

47.7
cont

Wind turbines V.B.29 will visually affect the landscape as well as flight path of birds + bats. How do you expect the placement of windmills to mitigate this? - The windmills should not interfere with birds + bats period. They should be moved elsewhere. It is an insult to nature. V.M.30

47.8

V.G.24 V.G.35 Exposure - to toxic air contamination significant & unavoidable - during construction This is not acceptable to expose residents to this.

47.9

In essence this project is an insult to the residents - birds + people of Parkmerced. There is little care for their safety + well being. This project should be denied.

47.10

Please send me a copy of the final draft EIR.

50. A. 111.16 New shopping space 300 000 plus
Potter, Stonestown + Westlake + our
Little Shopping Center in Parkmerced.
As well as isolate us in relation to surrounding
neighborhood. 47.11

11. 15. demolition of guaranteed
rent controlled apts 1500, is not acceptable.
As spoken by Dean Preston + Mitch
Olembert in June 17th meeting. One
cannot legally guarantee replacement. 47.12

11. 45. 111.54 111.45
underground parking + what do you
do with toxic waste
111.48 Massive stormwater retention
needed because of massive underground concrete
parking development - having layers
of impenetrable concrete is not my idea
of environmental health. Should not be
approved. 47.13

111 24 Building design placement
is not even defined. How can this
be approved? It would be irresponsible
to approve a plan that is not finalized
"Because overlay..." 47.14

Thank you for your
consideration of this letter.

Sincerely,
Cathy Dentz
322 Serrano Dr
S.F. Ca. 94132

RESPONSES TO LETTER 47

Cathy Lentz, July 8, 2010

Response 47.1

The comment questions the enforceability of the archaeological mitigation measures identified in the Draft EIR. Mitigation Measures adopted as part of the certified Final EIR would be imposed as conditions of approval for the Proposed Project if approved. The archaeological mitigation measure shown in Table II: Summary of Significant Impacts and Mitigation Measures, in Chapter II, Summary, p. II.6, as cited by the comment, stipulates close oversight and regular reporting by the archaeological consultant with the Environmental Review Officer (ERO) to help ensure successful protection of any archaeological resources.

Response 47.2

The comment states that there are too many significant and unavoidable traffic impacts as a result of the Proposed Project. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. Please refer to Master Response A.2, Transportation and Circulation, Section 3.4, in Section III.A, Master Responses, for additional discussion of this issue.

Response 47.3

The comment states that the Proposed Project should not be approved since the Draft EIR identifies significant impacts that cannot be mitigated. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response 47.4

The comment questions how increases in noise levels can be quantified. Noise levels are quantified in Section V.F, Noise. How noise affects the peace and quiet of the urban environment is described on pp. V.F.1-V.F.3. The results of the noise study quantify the noise impacts of the Proposed Project (for example, see Tables V.F.2, V.F.3, V.F.8, and V.F.9, pp. V.F.7, V.F.8, V.F.22, and V.F.25, respectively) and conclude that potentially significant impacts would occur within the site.

Response 47.5

The comment asserts that it is not acceptable to have unmitigable air quality impacts. Significant and unavoidable impacts were identified for air quality impacts associated with construction-related incremental cancer risk and non-cancer health impacts; an increase in criteria pollutant

emissions considered significant under BAAQMD significance thresholds; and cumulative air quality effects. Mitigation is identified where it would be feasible to implement. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response 47.6

The comment states that the project should not be approved due to significant and unavoidable wind and shadow impacts, combined with the existing environment.

As discussed in Section V.I, Wind and Shadow, on pp. V.I.6-V.I.10 and pp. V.I.13-V.I.16, the project could have some significant and unavoidable wind impacts, both during the approximately 20-year construction period and after all phases of the project have been constructed. The wind tunnel analysis (please refer to EIR Appendix C.a) found that after all phases of the project have been constructed, there would be an overall net decrease in hazardous wind conditions. Please refer to the discussion in Section V.I, Wind and Shadow, on pp. V.I.10-V.I.13 and pp. V.I.16-V.I.20.

The Project Site, like much of San Francisco, is generally foggy during the spring and summer months. Fog has little to no impact on wind speeds, but may affect pedestrian comfort. The presence of fog results in cooler temperatures, which may be perceived as being less comfortable than warmer temperatures on a clear day. The existing fog and wind conditions are considered part of the environmental baseline for the purposes of CEQA and the Draft EIR analysis. Section V.I, Wind and Shadow, p. V.I.4, states that the Proposed Project would have a significant wind impact if it resulted in a substantial increase in the number of hours that the 26 mph wind hazard criterion is exceeded or cause a substantial increase in the area subjected to winds greater than 26 mph.

Page V.I.48 of the EIR states that the Proposed Project would have a significant shadow impact if it affected, in an adverse manner, the use of any park or open space under the jurisdiction of or designated for acquisition by the Recreation and Park Commission or if created new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.

Response 47.7

This comment expresses general opposition to the Proposed Project and states that the only acceptable alternative is the No Project Alternative and does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

Response 47.8

The comment states that the proposed wind turbines would visually impact the landscape and would interfere with the flight paths of birds and bats. Please refer to Response 17.12 for a discussion of the visual impacts of the proposed wind turbines and to Response 45.11 for a discussion of the impacts of the proposed wind turbines on birds and bats.

Response 47.9

The comment states that having toxic air contaminants is not acceptable but does not raise any specific comment on the adequacy and accuracy of the analysis presented in the Draft EIR. The comment may be considered by decision-makers as part of their decision to approve or disapprove the Proposed Project. Certain quantities of toxic air contaminants and reactive organic compounds are emitted as a result of any construction activity and any motor vehicle activity, and those related to the Proposed Project are identified throughout Section V.G, Air Quality. Some of these would be considered significant and unavoidable (for example, construction-related emissions in Impact AQ-3, p. V.G.24), and for these feasible mitigation is identified (Mitigation Measure M-AQ-3).

Response 47.10

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the Draft EIR. A similar comment was raised during the public hearing. Please refer to Response TR.1.1, in Section III.B, Public Hearing Comments and Responses.

Response 47.11

The comment asserts that neighborhood businesses in surrounding and adjacent areas would be affected by the Proposed Project. See Response TR.11.3, in Section III.B, Public Hearing Comments and Responses, for a discussion of effects of the Proposed Project's retail space on other retail uses in the vicinity.

Response 47.12

The comment states that the loss of rent-controlled units is not acceptable and replacement of rent-controlled units cannot be guaranteed. Please see Responses TR.20.2 and TR.20.3.

Response 47.13

The comment expresses general opposition to the Proposed Project, specifically about the stormwater retention plan and amount of underground parking. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the project.

The comment questions how toxic waste from contaminated soils would be disposed. The handling of hazardous materials is addressed in the EIR in Section V.P, Hazards and Hazardous Materials, pp. V.P.10-V.P.19.

Response 47.14

The comment questions how the project can be approved if the building designs and locations have not been finalized. As described in the EIR in Chapter III, Project Description, p. III.24, the Proposed Project includes an amendment to the Planning Code Height and Bulk Maps that would provide an overlay for the entire site. This overlay would be adopted as part of the Proposed Special Use District. It would allow for more three- and six-story buildings to be constructed on the Project Site and would designate specific locations for new buildings taller than six stories. Rather than designate the exact location of all proposed buildings less than six stories in height, the proposed overlay would impose a base height limit within certain districts, and then permit a certain percentage of the land area within that district to be improved with buildings that exceed the base height limit. More specific requirements for buildings, streets, open spaces, and landscaping are outlined in the proposed *Parkmerced Design Standards and Guidelines*, which is also included as part of the Proposed Project, and is subject to review and approval by City decision-makers. As described in the EIR on p. III.29, the proposed design standards in the *Parkmerced Design Standards and Guidelines* establish specific quantitative requirements for the distribution of building heights on a block-by-block basis to protect viewsheds, reduce shadows on open spaces, maintain adequate space between tall buildings, and maintain an appropriate scale in relation to the width of public rights-of-way. The design standards also establish requirements for creating a continuous streetwall and for reducing the visual impact of off-street parking.

New construction within the Project Site would be subject to design review by the Planning Director or Planning Commission for conformity with the *Parkmerced Design Standards and Guidelines* as these are proposed in the future. As described in Section V.B, Aesthetics, p. V.B.24, implementation of approved design guidelines would ensure that the Proposed Project would not cause a significant adverse impact on the visual character and quality of the Project Site and its surroundings.

To: pic@sfgov.org
From: fanarona@aol.com
Date: 07/11/2010 05:23PM
Subject: Parkmerced's Proposed Destruction of Garden Apartments

I have been a resident of the GARDEN apartments in Parkmerced since 1974, and I do not want to live in a low to mid-rise apartment. I moved into my apartment specifically because of the courtyard, and the fact that my door opens to the outside world, not a hallway.

I moved here because I can easily go outside with my cat and dog, or say hello to a neighbor, without having to go through hallways and elevators. It gives a feeling of community and familiarity that is rare nowadays.

In the proposal they call Parkmerced a "bedroom community," and somehow think that this is a negative term. If I wanted to live in an urban area with retail shops, and lots of congestion, I would move. We have everything we need close at hand. Public transportation is 2 blocks away, shopping is less than a mile away in 3 locations. If the owners want more convenience they can try to reinstate the #17 bus that used to run downtown, and they can figure out what companies can survive in the retail property that already exists.

48.1

Parkmerced is unique, and that is a good thing. The last thing we need in San Francisco is another high density housing project.

I implore you to reject Parkmerced's planned destruction of our homes. No matter what they claim, they are not speaking on our behalf, they are only looking to maximize their profit margin.

Even if you overlook the careless destruction of a historical landmark in architectural design, you have to agree that a company in financial difficulty (possibly bankruptcy) should not be given a green light to begin a 30-year destruction/construction project which they will most likely end up abandoning, and thereby leaving us to live in a perpetual state of incompleteness and chaos.

48.2

Thank you,

Leon Cowen
32 Bucareli Drive
SF, CA 94132

RESPONSES TO LETTER 48

Leon Cowen, July 11, 2010

Response 48.1

This letter is essentially identical to the Comment 43.1. This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy or analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response 48.2

The comment raises concerns over granting approval of the Proposed Project given the Project Sponsor's financial ability to complete the Proposed Project. Please see Response TR.1.2, in Section III.B, Public Hearing Comments and Responses.

To: pic@sfgov.org

From: Etsuko Sakimura <porterii@yahoo.com>

Date: 07/11/2010 05:35PM

Subject: Proposed Demolition of my home in Parkmerced

I have been a resident of the GARDEN apartments in Parkmerced for over 4 years with my mother, and I do not want to live in a low to mid-rise apartment. I moved into my apartment because of the courtyard, and the fact that my door opens to the outside world, not a hallway. I am a senior citizen, and I care for my mother who suffers from a severe case of Alzheimer's. When we first moved here she was able to fully enjoy the garden, and it made her very happy. Now that her condition has worsened, I still take her outside, and let her sit in our patio so that she can feel the sunshine, and listen to the birds singing. I also take her walking with her walker around the courtyard. If Parkmerced's owners have their way, she will lose this connection to nature. Just taking her out of an apartment building will take all of her energy and mine as well. It will be a very lonely existence for both of us, as we will be isolated from our neighbors.

I moved here because I can easily go outside and tend to my flowers, while allowing my cat to explore the garden. I have friends who currently live in the towers, so I know how that feels. While the apartments themselves may be nice, the feeling of stepping out the front door into a hallway is claustrophobic, and waiting for the elevator is irritating.

I now have a network of wonderful friends who are my neighbors. We can see each other across the courtyard, and pop in to say hello any time. I can look outside my window and enjoy the flowers, and birds in my neighbor's patio.

They call Parkmerced a "bedroom community," and somehow think that this is bad. If I wanted to live in an urban area with retail shops, and lots of congestion, I would move. We have everything we need close at hand. Public transportation is 2 blocks away, shopping is less than a mile away in 3 locations. I have never met anyone who lives in Parkmerced who wants more shopping or more public transportation in the community. If anything, we want more privacy from non-residents who attend SFSU, and park on our streets causing endless parking headaches.

Parkmerced is unique, and that is a good thing. The last thing we need is another high density housing project.

I implore you to reject Parkmerced's planned destruction of our homes. Nomatter what they claim, they are not speaking on our behalf, they are only looking to maximize their profit margin at our expense.

Thank you,

Etsuko Sakimura (and on behalf of my mother Yoshiko Sakimura)

728 Gonzalez Drive

SF, CA 94132

RESPONSES TO LETTER 49

Etsuko Sakimura and Yoshiko Sakimura, July 11, 2010

Response 49.1

This letter is essentially identical to the Comment 43.1 and expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy or analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Mr. Julian P. Lagos
128 Garces Drive
San Francisco, California 94132
(415) 584-1700

RECEIVED

VIA PERSONAL DELIVERY

July 12, 2010

JUL 12 2010

Mr. Bill Wycko (Environmental Review Officer)
San Francisco Planning Department
1650 Mission Street - Suite 400
San Francisco, California 94103

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

RE: Draft EIR - Parkmerced Project (Case No. 2008.0021E)

Dear Mr. Wycko:

In response to the current Draft EIR re: the proposed Parkmerced Project, I submit the following concerns:

1. There are no less than fourteen areas of the DEIR where Significant Impacts exist without "feasible mitigation measures" in place, all violations of CEQA.

They are, as follows:

(AE-1) Proposed Demolition of 1538 Garden Apts. and Removal of Existing Landscaping;
(CR-2) Cumulative Impacts on Historical Design of Parkmerced;
(TR-8) Significant Impacts on one freeway segment adjacent to Parkmerced;
(TR-12 thru TR-14, TR-42, TR-43, TR-45, TR-46) Capacity overload on transportation routes;
(NO-3, NO-4) Project-related traffic would increase noise levels above existing ambient conditions;
(AQ-4, AQ-9) Project operations could affect regional air quality and could result in cumulative air impacts.

50.1

2. Additionally, the Draft EIR fails to sufficiently explain how proposed mitigation measures will address the following significant and cumulative impacts on Parkmerced and its residents:

(CR-3 thru CR-6) Project construction activities could disturb significant archeological resources, human remains, and paleontological resources within the project site;
(TR-1 thru TR-7, TR-9 thru TR-11, TR-21 thru TR-28, TR-36 thru 41, TR-44) Various Significant Traffic Impacts from proposed project on the surrounding streets, highways, and public transit links;
(NO-1, NO-2, NO-6, NO-7, NO-8) Project -related construction activities would increase noise levels above existing ambient conditions, expose persons and structures to excessive ground-borne vibration or noise levels; Project-related light rail noise and vibration level impacts; Incompatible noise environments; Increased noise levels from the operations of stationary noise sources;
(AQ-3) Construction of proposed project could expose persons to substantial levels of toxic air contaminants, resulting in adverse health effects;
(WS-1, WS-3) Hazardous wind impacts on proposed building structures;
(BI-1 thru BI-5, BI-7 thru BI-10) Significant impacts to wildlife, special-status animal species, natural habitats, plant and tree life, vegetation, wetlands, and migratory birds from various project-related construction activities, inclusive but not limited to stormwater outfall/run-off, removal of trees/shrubs, installation of proposed wind turbines, construction of building towers;

50.2

(GE-1) Project could result in substantial soil erosion and/or loss of topsoil during construction;
(HY-1, HY-2) Project could violate water-quality standards and waste-discharge requirements, degrade water quality, alter drainage patterns, and contribute to substantial soil erosion, siltation, and localized flooding in Parkmerced;
(HZ-2) Public health and environmental hazards from project-related release of dangerous and hazardous materials.

50.2
con't

3. The Draft EIR fails to address whatsoever the fact that Parkmerced sits in a volatile earthquake fault zone, has experienced past serious structural damage from the deadly, 1989 Loma Prieta Quake, and could possibly experience serious structural damage and/or failure, resulting in a high percentage of Parkmerced human casualties and fatalities from deadly future quakes.

50.3

4. The Draft EIR erroneously states and concludes that current Parkmerced garden apartment residents will be protected by local rent control ordinances and/or state housing laws, before, during, and after so-called "relocation" (D. Project Characteristics, Proposed Land Use, Tenant Relocation, p. III.15).

50.4

5. Finally, the Draft EIR fails to address the following critical factors and their impacts:

(a) The fact that the current applicants (Parkmerced Investor Properties, LLC) are critically in-default of their current mortgage obligations (over \$500 million dollars) and are unable to provide any evidence whatsoever to the City and County of San Francisco that applicants are financially-solvent and are qualified to receive substantial financing for their proposed multi-billion dollar Parkmerced project and associated cost over-runs, from any certified, interested and solvent private financial institutions, parties, or individuals.

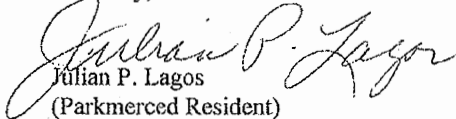
50.5

(b) The uncertainty of the highly-stressed global economy, volatile market conditions, financial institution solvency, sky-rocketing foreclosure rates, and inflationary impacts.

Given the reasons cited herein, I would submit that the current Draft EIR falls fatally short of meeting its legally-mandated thresholds established by CEQA, to advance the proposed Parkmerced project beyond its current status.

As such, the only project option which is currently feasible and legally-sound is Project Alternatives "A" (No Project Alternative), which I would advocate and recommend that the City and County of San Francisco adopt, at this time.

Sincerely,


Julian P. Lagos
(Parkmerced Resident)

RECEIVED

Cc: San Francisco Board of Supervisors

JUL 12 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

RESPONSES TO LETTER 50

Julian P. Lagos, July 12, 2010

Response 50.1

The comment states that there are multiple instances in the Draft EIR where significant effects are identified without feasible mitigation measures and asserts this is a violation of CEQA.

CEQA requires that all feasible mitigation measures be included. The EIR correctly identifies where no feasible mitigation measures exist. In those instances, impacts which cannot be reduced to an insignificant level without mitigation are identified as significant and unavoidable.

Response 50.2

The comment lists a series of impacts and associated mitigation measures and asserts that the EIR fails to explain how proposed mitigation measures address the Proposed Project's significant and unavoidable impacts. The comment does not specify in what way the discussions of the effectiveness of mitigation measures are insufficient. It should be noted that impacts as described in the comment are the potential impacts of the Proposed Project found to be unmitigatable. The following is a summary of the impacts and related mitigation measures raised in this comment:

In Section V.D.b, Archaeological Resources, Impact CR 3-6, mitigation measures are presented to address pre- and post-construction impacts (Mitigation Measures M-CR-3a and Mitigation Measure M-CR-3b, pp. V.D.45-V.D.49). Measure M-CR-3a would require a qualified archaeological consultant to prepare and submit a plan for pre-construction archaeological testing, construction monitoring, and data recovery prior to ground-breaking activities for Phase I of the Proposed Project. Mitigation Measure M-CR-3b would require a qualified archaeological consultant to prepare and submit an archaeological treatment plan prior to any ground-breaking activities for Phases II-IV. These plans are subject to approval by the San Francisco Environmental Review Officer (ERO). With implementation of these measures, the Proposed Project would not cause a substantial adverse change to the scientific significance of an archaeological resource and, thus, would render the impact less-than-significant.

The transportation impacts cited in the comment note that the Draft EIR does not adequately explain how the corresponding mitigation measure would address the impacts. However, as discussed in Section V.E, Transportation and Circulation, these mitigations would reduce impacts to some extent.

In Section V.F, Noise, Mitigation Measure M-NO-1a, p. V.F.19, would require a series of measures to reduce construction noise, including but not limited to muffling of equipment, noise barriers, noise attenuation features and a designated Noise Disturbance Coordinator to minimize

noise impacts of construction. Mitigation Measure M-NO-1b, p. V.F.19, calls for pile driving noise reduction through pre-drilling of holes, and state-of-the-art muffling equipment, among other things. Measure M-NO-2, p. V.F.20-V.F.21, would require pre-construction surveys to identify and identify corrective measures for unacceptable ground movement. Construction noise is temporary and intermittent. The loudest construction activities, e.g. pile driving when encompass a small portion of the overall construction time frame. Thus, with mitigation and compliance with local noise ordinances, these impacts were judged to be reduced below a level of significance.

Impact NO-6, pp. V.F.31-V.F.32, discusses the impacts of ambient noise levels, including light rail, automobile and transit noise on future residential tenants. Mitigation Measure M-NO-6, p. V.F.32, requires a qualified acoustic consultant to review plans for all proposed residences as well as the Pre K-5 school and day care facility to provide recommendation to insure that interior noise levels would not exceed 45dBA. Mitigation Measure M-NO-7, p. V.F.34, requires locating noise sources away from sensitive receptors and enclosing and screening noise sources. It also calls for noise monitoring and a subsequent provision of noise attenuation if noise sources exceed allowable noise standards. Impact NO-8, p. V.F.34-V.F.35, addresses impacts of residential garbage collection. Mitigation Measure M-NO-8, p. V.F.35, requires a qualified acoustical consultant to recommend acoustical shielding, enclosures and other equivalent measures to minimize these impacts. With these measures, it was determined that noise impacts would not be significant.

In Section V.G, Air Quality, Impact AQ-3, pp. V.G.24-V.G.25, discusses exposure to substantial levels of toxic air contaminants and is found to be a significant and unavoidable impact. Mitigation Measure M-AQ-3, pp. V.G.25-V.G.26, would reduce levels of contaminants, such as implementing feasible controls and requiring up-to-date equipment, but not to less-than-significant levels.

In Section V.I, Wind and Shadow, Impacts WS-1, pp. V.I.6 - V.I.10 and WS-3, pp. V.I.13-V.I.16, address potential hazardous wind impacts of the Proposed Project. As discussed on pp. V.I.6-V.I.10 and pp. V.I.13-V.I.16, the project could have some significant and unavoidable wind impacts, both during the approximately 20-year construction period and after all phases of the project have been constructed.

The comment also refers to project-related impacts on wildlife and natural habitats, specifically impacts and adequacy of mitigation for Impacts BI-1 through BI-5 and BI-7 through BI-10. Impacts on biological resources are discussed in Section V.M, Biological Resources, pp. V.M.23-V.M.36. Mitigation Measures M-BI-2a, M-BI-2b, M-BI-2c, M-BI-3a, M-BI-3b, and M-BI-4, pp. V.M.25-V.M.28, describe the proposed mitigations for these potential impacts. In summary, a qualified biologist and ornithologist would conduct a pre-construction survey of the site and

recommend measures to avoid or minimize impacts on protected flora and fauna. To the extent any protected plants are affected, the biologist would prepare a restoration and mitigation plan in cooperation with the California Department of Fish and Game (CDFG). An ornithologist would ensure that potentially impacted nesting areas are buffered during nesting season until birds have fledged. Vegetation removal activities in wetland and riparian habitats would be restricted to as small an area as possible, and then fully restored, if necessary. All of these measures along with preparation of the Storm Water Pollution Prevention Program (SWPPP) discussed further below would also serve to mitigate potential impacts on wetlands as discussed in Impact BI-5, p. V.M.28.

Similarly, the qualified ornithologist and biologist will monitor maintenance activities related to the outfall to insure that no nesting areas or protected species are impacted by that activity (Impact BI-7, pp. V.M.29-V.M.30).

Impact BI-9, p. V.M.34, describes impacts of new towers on bird migration. Mitigation Measure BI-9 calls for bird-safe design, which consists of a variety of means such as façade materials and non-clear glass to help insure visibility of structures to birds, thus reducing potential collisions.

Impact BI-10, p. V.M.35, describes impacts of the stormwater runoff affecting the willow basin and riparian vegetation. Mitigation M-BI-10, pp. V.M.35-V.M.36, calls for a hydrological study to identify if water levels could rise to levels that would adversely affect the wax myrtle, then the willow basin would be modified to reduce that rise.

The comment raises the issue of soils erosion impact and mitigation. In Section V.N, Geology and Soils, Impact GE-1, p. V.N.11, describes effects of construction impacts on exposed soil. Though this impact has no direct mitigation, the EIR cross references Mitigation Measure M-HY-1, which would employ Best Management Practices (BMP) and require a Storm Water Pollution Prevention Program (SWPPP) for implementation of design and construction specifications to address all site drainage control and other water quality control strategies during construction.

In Section V.O, Hydrology and Water Quality, Impact HY-1, pp. V.O.10-V.O.12, addresses water quality, and as noted above, Mitigation Measure M-HY-1, p. V.O.12, addresses water quality impacts from construction.

The comment cites concerns over Impact HY-2, pp. V.O.12-V.O.13; however, as discussed in the EIR, there are no Project-related impacts resulting in an increase of combined sewer overflows from the City's combine sewer system and waste discharge, and potential sewer overflows. The EIR notes on p. V.O.12 that the Proposed Project would reduce the annual average number of sewer overflows.

Impact HZ-2, in Section V.P, Hazards and Hazardous Materials, pp. V.P.10-V.P.12, addresses the release of hazardous materials into the environment. There are existing regulations regarding removal and disposal of potentially hazardous materials as part of the demolition process such as asbestos, lead paint, and solid waste, as discussed on those pages in the EIR. The EIR concludes that these accidental releases of these hazardous materials into the environment would be less-than-significant based on implementation of existing regulations. As noted in the EIR, preliminary soils investigations and sampling indicated that soil contaminants in significant amounts are not expected to be present on site. Nonetheless, Mitigation Measure M-HZ-2A, pp. V.P.12-V.P.14, would address potential handling and disposal of contaminated soil through soil testing during each construction phase and development. The plan would specify preferred means to handle any soil identified as contaminated. The mitigation also describes practices to be employed on-site during construction activity to minimize release of dust or contaminants, and requires a closure/certification plan subject to DPH approval for each construction phase.

Response 50.3

The comment states that the Draft EIR fails to address the Project Site proximity to fault zones. Please refer to Master Response A.3, Seismic Hazards, in Section III.A, Master Responses.

Response 50.4

The comment asserts that the Draft EIR erroneously states that the current rent controlled units would be protected by local rent control ordinance and state laws. See Responses TR.20.2, TR.20.3, and TR.2.2 in Section III.B, Public Hearing Comments and Responses.

Response 50.5

The comment raises concerns over the Project Sponsor's financial ability to complete the Proposed Project. See Response TR.1.2.

To: pic@sfgov.org
From: Lynne Sonenberg <lynnesonenberg@sbcglobal.net>
Date: 07/12/2010 11:16AM
Subject: Protest Increased Density in Parkmerced

July 12, 2010

To Whom it May Concern:

Nothing lasts. Change is constant. But what are the results you really want for expanding the density almost three-fold for the property currently labeled Parkmerced?

It is chiefly increasing the density of units and people I am much troubled by and protest.

It takes a village to raise a child? It will take a new police sub-station on-site in Parkmerced to raise and maintain civility if even doubling the density goes through.

The increased social and economic cost to the city and management company – to say nothing about the dissatisfaction of old and new residents -- will offset any profits made by the developers and increase the city's deficits. Unless, of course, you have bought into the concept of huge public housing projects that were seen as solutions to economic and social problems 40 years ago. Because what else would this turn into?

Who would choose to live in a development of 9000 units in San Francisco? It would not be the first choice of a desirable place to live in or near San Francisco for the majority of people. It is currently still a wonderful choice for middle class individuals and families because of the relative serenity of the surroundings and proximity to transportation alternatives. Therefore, I assume, you'd get people without many choices to live in the density you propose.

51.1

Parkmerced is not located in a hip, happening part of the city. No amount of greening Parkmerced, dressing up Stonestown Galleria or fluffing up Brotherhood Way will make it so. It isn't quaint, but it still lovely, due to the original landscape architect's vision and the way the original architects laid this development out in the early 40's (unable to look at our carport from our courtyard windows – great!). Putting a coffee house at each corner of Parkmerced still would not make difference in recruiting tenants.

I understand that the bulk of the current tenants are paying under \$1000 for their apartments. Other Bay Area cities have found creative ways to support the shrinking middle class that delivers needed services (i.e., ways for police and teachers and nurses to live closer to the cities where they work). That may be a clue to how to solve the problem of lower-than-desired occupancy in an aging development.

Believe me, people are not basing their decision to live in Parkmerced due to lack of garbage disposals in every unit.

It's because we're in an uninteresting, unexciting part of the city.

Let's hear it for boring and serene.

Please reconsider and do not go forward with increasing the density of Parkmerced.

Sincerely,

Lynne Sonenberg
706 Gonzalez Drive
SF 94132

RESPONSES TO LETTER 51

Lynne Sonenberg, July 12, 2010

Response 51.1

This comment expresses general opposition to the Proposed Project but does not raise any specific comment on the adequacy and accuracy or analysis presented in the Draft EIR. The comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

From:
M K Venkatachari
355 Serrano Drive, Apt 12-C
Parkmerced
San Francisco, CA 94132
mvenka01@yahoo.com
415-239-4180

To:
Attn: Mr. Bill Wycko (By e-mail attachment)
Environmental Review Officer
San Francisco Planning Department
1650 Mission Street, Suite 400
San Francisco, CA 94103

CC Mr Rick Cooper (By e-mail attachment)

Subject: Parkmerced Project Draft DEIR (#2008.0021E) - Citizen Comment

Dear Sir:

As a long-time resident of Parkmerced and as a senior citizen of our great City, I am rather concerned with some aspects of the DEIR even as I appreciate this opportunity to offer my comments on this report. I hasten to add that I am no expert on matters Environmental that, as we all know, are becoming ever more complex.

The Planning Department has expended a massive and commendable amount of effort in the production of this document, and it is filled with details that should be of great interest to citizens of this great City of ours.

This project, when implemented, would be a huge production in the City. A neighbor of mine here in Parkmerced has even named it as the "Manhattan Project," not because he expects the end-product to be a bomb, but for the project's effect on the skyline of this "bovine" part of town, for its grandiose conception that includes several scores of high-rise buildings in close proximity, cheek-by-jowl, to one another where many monster buildings are misleadingly designated as "medium rise". The undisputed fact happens to be that the project is so huge and its impacts so very massive that it demands a careful evaluation and vigilance of the officers and citizens of the City at ever stage.

Unfortunately at this moment I happen to recall the fact that our City, (so too Chicago, I believe) not too long ago, dynamited several high-rise residential buildings, buildings with several useful years life still intact, because of several compelling reasons, and despite the huge costs that such a demolition entailed for the City, its taxpayers and the people who depended upon such housing. I wonder how far that experience could help guide our City fathers in evaluating the present project.

I have listed below some of my other comments arising from a rather cursory perusal of the documents for your consideration.

Third Party Peer-Expert Review

We have a huge and complex project in front of us. We also have a great set of documents, that, despite their umpteen merits, tend on occasion, to digress towards positions that some people might perceive, perhaps quite unfairly, as a tilt in favor of going ahead with the project rather than staying the course as a purely objective evaluator of the impacts of the project on the environment, the role for which the entire effort has been undertaken. An example for such people could well be even a trivial one, like the heart-warming picture showing a man walking along a broad, spic-and-span sidewalk with his guide dog, presumably in the new Parkmerced of circa 2030. As they say, perception is equally important to reality.

Considering the magnitude of the project, and the common and widespread awareness that the sponsors of the project directly funded the production of this DEIR, it would be prudent for reasons of transparency, to engage, at the very minimum, an independent and third party with proven and comparable technical and scientific expertise to review and comment on the DEIR. The ordinary citizens of the City among whom these draft documents have been distributed for review would definitely help with their comments but their inputs can never replace the essential need to have a second and independent expert opinion on these documents and their conclusions.

52.1

City-wide Citizen Participation in the Decision Making in the Form of a Ballot Measure

The DEIR talks about several City and official "approvals" that are needed for the project in the coming phases under the heading, Project Approvals (Page III.66)/ But the list does not include (despite some repetitions) the most important approval of them all in the context of the huge magnitude of the planned activities: that of the citizens of the City in the **form of a ballot measure**. We have to remember that the taxpayers of the City not only fund the various costs borne by the City in connection with the project but are essential partners in this venture.

52.2

The Project, straddling as it does the narrow entry point to the City from the Peninsula, would affect the lives of all San Franciscans in several respects including traffic, tax base, environment, housing costs, property values and on. Besides, the major construction work involved and the planned realignment of streetcar tracks and routes would disrupt lives of thousands of citizens. Moreover these activities cost a ton of money to the City in terms of alternate bus runs in place of street-cars and so on. There is also the question of surrendering some of the City owned pieces of land occupied by the existing streets of Parkmerced of today, to the developer for building his rental houses, with some existing streets disappearing all together or narrowed considerably in order to accommodate the developers plans for his buildings. The citizens of SF are the owners of such City owned land should know about all the costs, benefits and terms under which the City gets to work with this private party in this project including transfer of pieces of land. Besides several established standards, zoning laws and codes in regard to buildings in the City are planned to be changed just for the sake of this project. All such actions should be done in a very transparent manner. Then there is the question of the "unavoidable" deterioration of the quality of life in the city (Traffic is a major concern here) that are listed by the DEIR itself. We would also like to know if the loss of a historical landmark of the City and the country would be acceptable for the citizens. Given these circumstances, a ballot measure for approval of the project by the citizens of the City is essential. Nobody should be able to claim later that the matters were rushed through without the knowledge and conscious consent of the citizens of the City; since this is no ordinary building project.

Depletion of the Pool of Rent-Controlled Units in the City & Legal Safeguards for the Rights for Displaced Tenants

The Project calls for the demolition of 1538 rent-controlled units that would be replaced by units that would no-longer come under laws governing rent control, The permanent removal of such a large number of units from the ever diminishing pool of rent-controlled units in the City is a source of deep concern. The sponsors of the Project promise that the current tenants displaced from such demolished units would be provided with equivalent housing from among the new units under same rant and control terms. But such measures are temporary and would only apply to the currently displaced renters; the moment these tenants vacate, for any reason at all, their units would revert to a market-rate rent regime. This constitutes a huge loss for the poor and fixed income people of the City. Besides, it should be noted that, in the absence of a specific and new law, there is no legal protection for the affected and displaced tenants in the matter of the promises they receive from the current owners of the development in terms of their rents and their yearly increases. This too is a matter of concern.

52.3

Transportation and Circulation (TR)

The authors of the report list close to fifty impacts under this (TR) category and almost all them fall, in terms of their characteristics, under the SU (significant, negative and unavoidable impacts) classification. As a common man who uses the Lake Merced Boulevard and the 19th Avenue on most days, I fear the nightmare that is waiting to happen even if no more housing is planned at Parkmerced and housing development in the works abutting its boundary. I note that the plans call for many new signal-equipped vehicular portals to connect these two streets with those inside the complex. As we know these two streets squeeze the Parkmerced complex in tight space as if in a vice. I shudder to think of all the delays and reduction in vehicular capacity of the concerned streets that would invariably follow the addition of new signaled portals and near four fold increase in the population due the developments between these two streets not to mention the expected explosion in the enrollment of SFSU that too lies within the same wedge of the two streets. These two streets are important and vital, with 19th Avenue forming part of California Route 1; these are already overstressed due to traffic. The traffic situation is bad and it would get lot worse, a situation that the report calls, "unavoidable." In this connection, I wonder, if dynamic and interactive computer simulations were prepared and studied with all the new and planned entry/exit portals in place, at conditions of expected vehicular traffic flow rate in the years to come. Every person I have talked to is deeply distressed at the thought of the feared traffic chaos, commuter misery, damages to quality of life, delays, inordinate gas consumption deterioration of the air and water quality that could follow with the project as eve the DEIR seem to confirm with a deep sense of helplessness. Would some carefully placed new "fly-overs" help motorists avoid the south-western tip of the City around Parkmerced when driving to destinations way north from 280 N?

52.4

Wastewater and Storm Water Handling and Treatment

The environmental impacts arising out of the need to treat and dispose of in an acceptable and environmentally friendly manner the significantly larger amounts of waste water that would arise once the Project with all the additional housing is completed is addressed in at least three sections of the DEIR in addition to the Project Description (Page III.51). The issue is riddled with more uncertainties than what would appear on the surface. The importance of this issue is clear when we consider the huge amount of valuable SF land that the sponsors have set aside to serve the on-site wastewater treatment system, in the form of numerous artificial ponds and marshes, a huge terminal wetland farm, an organic farm, and so on.

A brief review back-ground information, as I understand it, would help at this stage. Wastewater consists of two distinct components: (a) the sewage water derived largely from toilets, kitchen

sinks, washing machines, and such in homes, offices, and retail shops; (b) the storm water that is produced by rain falling over roof tops, open concrete floors, parking lots, paved streets, and in general, open-to-the-sky areas that provide an impervious surface to rain water; these surfaces are very unlike, for example, a lawn or an unpaved yard or field where the falling rain water gets absorbed in the soil, percolates to the depths or just evaporates, thereby needing no further treatment or disposal by the human hand or ingenuity. This water is also free from pollutants normally associated with storm waters from streets and pavements largely due auto and other traffic and as such their infiltration into the underground water table mimics what happens in nature when left alone by humans.

Currently all wastewater (both sewage and storm water) of Parkmerced and communities in the neighborhood are co-mingled and treated together in a two-stage treatment plant (that seems to serve quite a large area/population on this part of the City), the Oceanside Water Pollution Control Plant (OWPCP) with a capacity to treat a maximum of 43 mgd in both the stages in sequence; a larger capacity is available in the first stage. On occasions when there happens to be a heavy rainfall packed within a short period of time, currently, the second stage capacity being a limiting factor, the excess input of wastewater beyond 43 mgd that flows to the treatment plant is discharged into the Pacific Ocean immediately after the first stage treatment, a feature that is not desirable at all and is permitted at around current levels only: less than seven events in year. It is reported that under existing conditions, 6.8 events occur in a year, on average, when such discharge of partially treated wastewater into the Pacific Ocean has to be resorted to. Any increase in wastewater flow to the treatment plant would cause exceed the value of 6.8 and would call for a compulsory increase in the treatment capacity of OWPCP; the city would have to pay both the capital and running costs of such a development besides other associated costs.

Thanks to the Project and the resulting increase in the resident population and transit population generated by the new retail and office interests, the quantity of sewage water is expected to increase roughly in proportion to the number of people served. At the same time, the amount of storm water that would be collected would also increase significantly, due to the following reasons: (a) reduction of areas that are currently devoted to lawns, unpaved planting areas and courtyards from where the rain water is allowed to percolate into the ground or evaporate (b) increase in impervious surfaces like asphalt or concrete covered street pavements, sidewalks, walkways, roof tops and such impervious surfaces open to rain from where storm water has to be collected.

The Base Scheme for wastewater treatment (as against the storm water variant first called out in Page III.51) for the Project, as described in the DEIR, envisages dealing with the components of the wastewater as two separate streams in the following manner: (a) a sewage stream consisting of all the sewage arising in the Project with some unavoidable rain generated storm water in it; (b) a largely isolated storm water stream. As noted earlier, the existing system does not make this separation, but combines the two as a single commingled stream that end up at the City's OWPCP.

The separated and relatively small volume sewage stream from the Project is then directed, as presently, to the OWPCP, and since it would be largely free of storm water, any increase in flow rates of this element of the current stream would be small compared to the overall capacity of the treatment plant built to handle both sewage and all storm water from Parkmerced along with such from other parts of the City as well (Page V.K 19).

As regards the storm water stream or element of the Project (as against the sewage stream noted above) the Project plans an on-site process to "capture and filter the runoff (from roofs, parking

lots, impervious surfaces and streets –MK) though a series of bioswales (planted marshes?), streams, ponds, and other natural filtration systems to retain, detain, and infiltrate the runoff.” (Page III.48). Besides a new artificial pond at the center of Juan Bautista Circle, the scheme also includes a “riparian corridor”, which the authors of DFIR describe as “a zone between land and a stream characterized by water loving plants.” I believe this description indicates a man-made marshy swamp in other words. This corridor, the authors go on to say, would consist of “streams, biowales, biogutters, and small ponds. Eventually the residual waste water from all the above devices end up in one more huge man-made pond called the Terminal Wet-land Pond from where a overflow would be taken and dumped into, Lake Merced.

Based on this plan of action and the processes described above, the Report awards a *Less than Significant* impact award, under UT-5 (page V.K. 18) and comes to the definitive conclusion that the Proposed Project would not need a new or expansion of wastewater collection or treatment facilities (on the part of the City, presumably). The matter thus slides neatly under the radar despite serious questions which the report itself talks about at some length.

The following questions come to mind in the matter of the Project’s waste water treatment and disposal scheme as described above:

- Figure III.10 of the DEIR shows a wide swath area in color green which is marked “Recreation Area” and “Organic Farm”. However, in Figure III.18, the same “Recreation Area” is named as “Terminal Wetland Pond”. The report lacks a detailed description as to how this area would be made suitable for both functions. What kind of recreation would be available?
- Do these areas, Organic Farm and the Terminal Wetland Pond form part of the “open spaces available for public access” calculations given in the report?
- Some of the untreated storm water gutters end up in land designated as “Organic Farm” and over the dry ground in Juan Bautista Circle (out side the new pond). Would the locations would be available for public access and be dry enough on normal days for people to, say, walk around or would be slushy most of the days of the year as the collected storm water takes its time trying to percolate into the water table below?
- If the idea of the Organic Farm is to soak up some of the storm water, would the expected heavy metal content of storm water vitiate the “Organic” claim of the farm? This question applies to all locations where storm water, in any form, is allowed to enter the ground water table within the Project.
- How do we prevent the heavy metals found and reported from all urban storm water systems from polluting the ground water at locations where such waters are allowed to infiltrate into the water table?
- The Basic scheme as proposed handles a huge amount of storm water that also includes, over and above the storm water generated within the property, such water from the pavements of 19th Avenue and other areas and streets east and north, of this highway. And as such we should expect it to be heavily polluted with among many bad actors and toxic chemicals including heavy metals, a contingency for which the existing City operated waste water system, the Oceanside Water Pollution Control Plant, provides for a second stage cleanup with activated sludge to treat the residual water before it is discharged into the Pacific Ocean, the second stage being important in order to protect the waters of the ocean.
- But in the Basic scheme as proposed, no such second stage cleaning is contemplated. Fully twenty five percent of the storm water is delivered as over flow to Lake Merced that may be expected to be ever more sensitive to such pollutants than the Pacific Ocean, being a much smaller body of water compared to the ocean.

52.5

52.6

- The report states (Page V.M.21) that “Most of storm water run-off (other than the 25 percent overflow to Lake Merced—MK) would infiltrate **directly** (Emphasis added – MK) into the Upper Westside groundwater basin that feeds Lake Merced;” Should this be acceptable?
- I suspect that the “business-as-usual” overflow from the Terminal Wetland Pond to Lake Merced together with the 24/7 infiltration thorough the ground/soil at numerous ponds and gutters right into the groundwater table called the Upper Westside ground water basin which in turn feeds Lake Merced would contaminate the only pristine lake in our neighborhood which is considered to be a standby drinking water source for the people of San Francisco. It a pity that one would contemplate dumping such contaminated water into this lake, a liquid that we would not let pollute even the Pacific Ocean beyond 6 or so occasions in a year, during rare occasions of extremely heavy downpour.
- The report envisages the possibility that the proposed scheme to discharge of the overflow from the Terminal Wet Pond into Lake Merced may not be allowed by SFPUC (page V.O.10) and proposes as backups these two schemes: (A) “retain (such overflow-MK)in the Project Site in below-ground storm water drainage wells to gradually infiltrate into groundwater”, or (B) discharge the overflow “directly into the existing combined sewer/storm water pipes that flow by gravity to the OSP.” The first of the schemes, (A), does not help the problem it is meant to solve as the water would still end up Lake Merced through the groundwater table to which it is expected to percolate into. The second scheme (B) takes care of the 25 percent of the flow that was planned from the Terminal Wetland Pond to Lake Merced, but leaves untouched the 75 percent that percolates in Upper Westside ground water basin that eventually flows into the very same Lake Merced!
- Where are the impacts of the injection or infiltration of storm water into the Upper Westside ground water basin addressed in the DEIR?
- The report does not provide details of the various components of the storm water system and their impact on the environment and the under-ground water table; this is true particularly of the ponds, swamps, and marshes, big and small. My friend Bob wants to know if the ponds, and the wetlands could create, for example, a mosquito problem for the residents to deal with.
- It is surprising to see that this scheme with so many unanswered questions obtain the coveted *Less than Significant* citation for its impacts under UT-5 (Page V.K.18) and a certification, under “Criteria Ka, Kc, and Ke”, and similar ones under UT-6 (Page V. K.20). In fact the report goes further and commends the proposed scheme for reducing the frequency of overflow into the Pacific Ocean of partially treated water from the current 6.8 times per year on average to 6.5 (Page V.K.20) ignoring the possible damage being done to Lake Merced at the same time.
- It would be interesting to know about the experience of other US cities, if any, with urban storm water treatment methods similar to the one being proposed in the report.

52.7

52.8

52.9

52.10

Approval in Proceed in Graduated Stages

Considering that the report does not provide mitigating solutions to several problems like, for example, the inevitable traffic nightmare in the Parkmerced neighborhood whose effect would radiate not merely in the City but in the neighboring counties as well, it would be prudent that the plan be approved in stages after evaluating the conditions after each of the proposed three or four stages of construction, instead of providing the Developer an unbridled freedom of action once the entire Project gets approved now, one that would bind the City for the next 20 years and longer yet, possibly.

52.11

Other Related Issues

- The City should make a comprehensive evaluation of its costs, costs involved in having this Project executed. I suppose it is being done separately as it is well known that it is not enough to have a Environmental Impact Report; we need dollar cost estimates of the project for the City and its taxpayers. For example, if the City pays for the new and altered street pavements, drains, lighting and so on how much would it all cost?
- We have to remember that the EIR is not the end-all, and that reports of this kind come with inherent deficiencies. For example, the methods adopted have no uniform way of quantifying the degradation of many features and this lack does not relate to matters of aesthetics only. Here is an another example: the report says something to this effect, "The current situation is bad and is of the failing grade F, say, at the intersection named X. After the planned development it would still remain in the failing grade F, and thus the development has no additional negative impacts." This kind of approach tends to mask serious degradation and get the approval stamp as one with no added impacts! This problem seems to be another manifestation of the current system's inflexibility in having nothing below, say, the failing Grade of SU. As a result, a feature that is deeply flawed gets to portray itself as the same as one that could be several degrees better despite its SU rating. Such a rating system is neither fair nor prudent. Under this methodology a case of "SU before and SU after" could get positive verdict despite serious relative degradation in the "after" scenario.
- The report does not explain the steps of its methodology that involve generation of quantitative numbers (say, in terms of number of trips) based on what appear to be qualitative factors such as the four "D" on page VE 42. The same lack of information is seen with respect to the adjustments claimed for "local conditions" and the reader is left to wonders what "local conditions" could be relevant and how to quantify their respective impacts. For example, how are the impacts of the development in the neighborhood (SF State, Cambon Dr and Botherhood) as well natural growth in this part of the state have been allowed for in the predictions shown in the report?
- By eliminating the current system of traffic islands all over Parkmerced and by introducing conventional "Four Way Stopped" stop signs, the new system will force all motorists to adopt a very wasteful stop-go regime at every intersection. I believe this change has been introduced to reduce space occupied by streets and by traffic islands so that the saved space could be used to build rental housing.
- The shadow analyses of the report concentrate on only the areas designated as Plazas that are not significant in terms of their foot-print size in this huge complex. Such an analysis should also be specifically extended to address the shadow cast by the new towers on public grounds (large and small) and existing buildings, particularly by the new towers in Block 10 and Block 6. These two blocks will accommodate the largest number of huge towers al in close proximity to existing towers who will now be under the shadow of the new ones for most of time. Also, the loss of views by apartments in the existing towers because of the new ones should also be recognized and remedied to the extent possible.
- In the context of shadow analysis of new buildings, conclusions to the effect that availability of four hours of sunshine in a day should be fine is difficult to accept in our low-sun shine City. What is the basis for such a conclusion?

52.12

52.13

52.14

52.15

Mr. Wycko, I do hope you would find my humble comments useful in your heroic efforts to get a environmentally impeccable project for the City that we all love. You have the sincere support of all citizens of this great City in this matter.

With warm regards,

Sincerely,

M K Venkatachari

RESPONSES TO LETTER 52

M. K. Venkatachari, July 12, 2010

Response 52.1

The comment states that as the project sponsor funds the EIR, a third party peer review of the Draft EIR is needed. The Department's Major Environmental Analysis (MEA) section oversees the preparation and publication of the Draft and Final EIRs, in collaboration with an environmental consultant that works under MEA's direction. Though the cost of hiring the consultant is funded by the project sponsor, the environmental consultant does not represent the project sponsor. Additionally, any motion by the Planning Commission certifying the Final EIR must make a finding that the document, "... reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective."

Response 52.2

The comment suggests a ballot initiative be implemented so that San Francisco citizens can vote on funding the various costs incurred by the City as a result of the Proposed Project, but does not raise any specific comment on the adequacy and accuracy or analysis presented in the Draft EIR. This comment may be considered by the decision-makers as part of their decision to approve or disapprove the Proposed Project.

Response 52.3

The comment cites concern over the loss of rent controlled units. Please see Responses TR.2.2, TR.20.2 and 20.3, in Section III.B, Public Hearing Comments and Responses, for a discussion of rent control and displacing existing tenants.

Response 52.4

The comment states that traffic would substantially worsen as a result of the Proposed Project, and asks whether the proposed new intersections providing access to the Project Site were studied in computer simulations. The transportation analysis included analysis of the impacts at each of the proposed new intersections. Intersection levels of service were analyzed using the Traffix software, which contains analysis methods consistent with the 2000 Highway Capacity Manual (see p. V.E.24), the standard method used by many jurisdictions to evaluate intersections. Because traffic signals along 19th Avenue are coordinated, a supplemental analysis using a simulation model was performed along a portion of 19th Avenue for the *19th Avenue Corridor Study*, to determine how the transportation network changes would affect general traffic flow along 19th Avenue. The results of the simulation analysis are presented in that study on pp. III.64-III.68. Simulation models are typically used to study detailed operational characteristics along a

corridor, rather than the types of planning-level analyses that are presented in the EIR. The Traffix software provides sufficient information to identify potential significant impacts and feasible mitigation measures that would reduce impacts.

This comment also suggests that a number of large-scale transportation improvements should have been incorporated into the analysis, specifically “flyovers” to allow regional traffic to bypass the sections of 19th Avenue and Junipero Serra Boulevard adjacent to the Project Site. Such a proposal is not included as part of the Proposed Project nor is it recommended as mitigation for project-related impacts. A mitigation measure of this nature need not be considered because CEQA does not require discussion of mitigation measures that are infeasible, including any mitigation measure that itself may constitute a project as complex, ambitious and costly as the suggested measure. However, such improvements are being considered as part of the *19th Avenue Corridor Study* Tier 5 improvements, which examine large-scale regional improvements throughout the study area. See Master Response A.2, Transportation and Circulation, Section 3.1, in Section III.A, Master Responses, for more discussion of the relationship between the Proposed Project, the Draft EIR, and the *19th Avenue Corridor Study*.

Response 52.5

The comment asserts that the Draft EIR fails to adequately describe the proposed stormwater treatment and disposal plans.

As described in Chapter III, Project Description, pp. III.48-III.51, the Proposed Project would provide an on-site stormwater system to capture and filter stormwater runoff from buildings, streets, and other non-permeable surfaces rather than diverting it to the municipal wastewater system as occurs now. This system would capture and filter runoff through a series of on-site bioswales, streams, ponds, and other natural filtration systems intended to detain, retain, and infiltrate conveyed runoff. Included is a 1.4-million-gallon stormwater collection pond to be constructed in the Commons area (Juan Bautista Circle). Water would flow into the collection pond through constructed treatment and filtration mechanisms (streams, bioswales, biogutters). The collection pond would hold water year-round and native aquatic vegetation would be encouraged.¹ Stormwater overflow from the collection pond and other flows from the western and northern portions of the Project Site would flow through a riparian corridor² consisting of streams, bioswales, biogutters, and smaller ponds that would provide preliminary treatment

¹ It is anticipated that the collection pond would hold water year round, though it would likely need to be supplemented with water from a combination of captured stormwater and groundwater supplies during the summer and early fall months.

² A riparian corridor is the zone between land and a stream, characterized by water-loving plants. It is not a marsh, which is characterized by plants growing directly in water.

before the water flows into a terminal wetland pond proposed in the southwest corner of the Project Site. Most of this stormwater runoff would infiltrate into the Upper Westside groundwater basin as it flows in the bioswales and the streams proposed to be constructed as part of the stormwater system. It is anticipated that approximately 25 percent of the average annual runoff would flow off site from the terminal wetland pond into Lake Merced, after being treated further in either an on-site wetland or an underground filtration facility. There are three options for discharge into Lake Merced: piped from the terminal wetland pond into an existing 30-inch conduit below Lake Merced Boulevard; piped from the terminal wetland pond into a new conduit below Brotherhood Way, where it would flow into a willow basin located south of the Project Site at the intersection of Brotherhood Way and Lake Merced Boulevard, and discharge into an existing 48-inch conduit below Lake Merced Boulevard; or piped from the terminal wetland pond into a new conduit below Brotherhood Way, where it would connect to the existing 48-inch conduit below Lake Merced Boulevard.

The southwestern portion of the Project Site would serve for both stormwater retention/ treatment and recreation and open space. Organic farms are planned west of the stormwater streams in the south-central area of the site. The farm would be constructed at a higher elevation than the stormwater retention and treatment area, and therefore flooding would not occur. Stormwater would also not be directed into farm area. As described in Chapter III, Project Description, pp. III.48-III.51, there are several water quality strategies for treating runoff that are included in the Proposed Project. These include natural filtration systems intended to retain, detain, and infiltrate conveyed runoff. Stormwater overflow from the planned collection pond in the Commons and other flows from the western and northern portions of the Project Site would flow through a riparian corridor consisting of streams, bioswales, biogutters, and smaller ponds into a terminal wetland pond proposed in the southwest corner of the Project Site.

To clarify the description of the proposed stormwater treatment and disposal plans, the following discussion about stormwater infiltration is added to the Project Description on p. III.48:

Infiltration allows stormwater runoff to flow slowly over permeable surfaces, which allows pollutants in the runoff to settle into the soil where they are naturally broken down. Infiltration systems are also often used in combination with a detention basin to control peak hydraulic flows and effectively remove suspended solids, particulates, bacteria, organics and soluble metals, and nutrients through the vehicle of filtration, absorption, and microbial decomposition. In cases where groundwater sources are generally deep, such as the case on the Project Site, there is a very low chance of contamination from normal concentrations of urban runoff.

(See Section V.N, Geology and Soils, p. V.N.3, where the EIR states that the depth to groundwater ranges from 20 to 50 feet north of the Project Site, about 80 feet near the center of the Project Site, and 15 to 40 feet at the southernmost portion of the Project Site. The EIR also notes that perched groundwater may be present at a depth of about 20 feet in some areas of the Project Site.)

Response 52.6

The comment expresses concerns about the treatment of stormwater runoff and potential impacts on the water system. As described in “Proposed Project and Stormwater Management System,” in Section V.O, Hydrology and Water Quality, pp. V.O.9-V.O.10, the Proposed Project would include implementation of a stormwater management system to capture and filter stormwater runoff from buildings, streets, and other non-permeable surfaces rather than diverting it to the municipal wastewater system. Treated stormwater runoff that would be discharged into Lake Merced would comply with water quality standards for key pollutants as stated on pp. V.O.5-V.O.6. The Stormwater Management System, including any discharge into Lake Merced, would be regulated by the RWQCB to prevent contaminants entering surface water or the groundwater basin.

Stormwater runoff is anticipated from roofs, hardscape, and interior streets located within the Project Site. There would be no off-site runoff, including runoff from 19th Avenue, entering the Proposed Project’s Stormwater Management System.

Response 52.7

The comment expresses concerns about contamination of Lake Merced from stormwater runoff from the Project Site. Stormwater runoff would be treated before discharge to Lake Merced. Please see Response 52.6 for a discussion on stormwater treatment standards for discharge into Lake Merced and Response 52.8 for a discussion of infiltration of stormwater into the underlying groundwater.

The comment also describes the proposed stormwater variants, as described in Chapter III, Project Description, p. III.51, but does not provide specific comment on the EIR regarding this issue.

Response 52.8

The comment asserts that impacts from infiltration of stormwater into the Upper Westside groundwater basin and the impacts of that groundwater flowing into Lake Merced are not discussed in the EIR. Most contaminants are gradually removed as rainwater slowly infiltrates through the soil to groundwater. The City’s Stormwater Design Guidelines³ encourage “low-

³ San Francisco Public Utilities Commission, *San Francisco Stormwater Design Guidelines*, 2009, available on the San Francisco Public Utilities Commission website, at sfwater.org/mto_main.cfm/MC_ID/361/MTO_ID/543. Accessed on August 8, 2010.

impact design,” by increasing retention, detention, and infiltration.⁴ Best management practices include treatment controls such as vegetated swales and flow-through planters, like those proposed in the Project described in Chapter III, Project Description, pp. III-48 - III.51, and in Section O, Hydrology and Water Quality pp. V.O.9 – V.O.10 . Treatment controls such as bioretention, biofiltration (vegetated buffer strips, sand filters), and infiltration trenches are listed in the Stormwater Design Guidelines as BMPs that capture and treat metals.⁵ Thus, the proposed stormwater management system would comply with the City’s guidelines and would provide appropriate treatment of stormwater, without causing significant impacts in Lake Merced. A brief discussion of the City’s Stormwater Design Guidelines has been added to the EIR on p. V.O.8 under “Local Regulations”:

Stormwater Design Guidelines

The San Francisco Public Utilities Commission and the Port of San Francisco developed Stormwater Design Guidelines in 2009.¹⁴ These guidelines describe the requirements for stormwater management in San Francisco. They provide direction and criteria for the preparation of stormwater control plans for post-construction stormwater management, required of any development project disturbing 5,000 square feet or more of ground surface.

A following new footnote has been added to p. V.O.8:

¹⁴ San Francisco Public Utilities Commission, *Stormwater Design Guidelines*, 2009. SFPUC website at http://sfwater.org/mto_main.cfm/MC_ID/14/MSC_ID/361/MTO_ID/543. Accessed August 27, 2010.

A new second sentence has been added in the fourth full paragraph on p. V.O.11, under “Operational Impacts on Water Quality” as follows:

These features would meet the requirements of the City’s Stormwater Design Guidelines.

Response 52.9

The comment states that the EIR does not provide details of the various stormwater system components and impacts to the groundwater table. The Proposed Project would include new facilities to capture and manage stormwater separate from wastewater flows, unlike the majority of San Francisco, where stormwater is discharged directly to the City’s sewer system for collection and treatment. These facilities are described in the EIR in Chapter III, Project Description, on pp. III.48-III.51, and are shown on Figure III.18: Proposed Hydrology Network, p. III.49. The proposed facilities are also summarized in Section V.O, Hydrology and Water

⁴ Ibid., p. 26.

⁵ Ibid., p. 87.

Quality, on pp. V.O.9 – V.O.10. Impacts of the proposed stormwater system are described in Section V.L, Biological Resources, in Impacts BI-7 (pp. V.M.29-V.M.30) and BI-10 (pp. V.M.35-V.M.36), and in Section V.O, Hydrology and Water Quality, in Impact HY-1 (pp. V.O.10-V.O.12). See also Response 52.5 for a discussion of the effects of stormwater infiltration on groundwater.

Additionally, the comment raises questions whether the proposed wetland areas will create mosquito problems on the Project Site. Although this comment does not address any CEQA significance criteria, mosquitoes would not be expected to be a problem in stormwater features that have flowing water such as the proposed bioswales and streams. Mosquito issues in standing water features would fall under the jurisdiction of the San Francisco Department of Public Health, which hires a “Mosquito Abatement Courier Team” to monitor and treat mosquito infestations that threaten human health. The Mosquito Abatement Courier Team would have access to the Parkmerced stormwater features for monitoring and treatment. Treatments would likely include introduction of mosquito fish into ponds; mosquito fish are a non-toxic, low maintenance, and highly effective way of controlling mosquitoes.

Response 52.10

The comment asserts that the EIR does not adequately address project-level and cumulative stormwater conveyance and treatment impacts and states the EIR ignores the possible impacts the Proposed Project would have on Lake Merced. Impacts UT-5 and UT-6, in Section V.K, Utilities, pp. V.K.18-V.K.20, describe the Proposed Project’s impacts on wastewater conveyance and treatment, including the reduction in volumes of wastewater with the proposed separate capture and treatment of stormwater runoff. The EIR concludes that the Oceanside Water Pollution Control Plant has the capacity to provide secondary treatment of up to 43 million gallons per day (mgd). Therefore, sanitary sewage alone from the Proposed Project would not result in the need for new treatment facilities, and the Proposed Project would not cause the plant to exceed any treatment requirements established in the NPDES permit.

The San Francisco wastewater collection and treatment system is sized to accommodate combined sanitary sewage and stormwater runoff. The Proposed Project would result in greater sewage volumes, which, in combination with stormwater runoff, could place greater demands on the collection and treatment system. However, the Proposed Project would include construction of a collection system to capture stormwater runoff from buildings, streets, and other non-permeable surfaces and direct it away from the combined sewer system. This would reduce the volume of stormwater runoff entering the combined sewer system by about 48.6 to 56.3 million gallons per year; thus, the Proposed Project would not result in combined sanitary sewage and stormwater flows that exceed the capacity of the conveyance or treatment facilities. No new facilities would be required to collect and treat wastewater from Parkmerced.

Cumulatively, buildout of the Proposed Project and other cumulative projects in the area would increase wastewater volumes by 0.43 mgd, an increase of approximately 48 percent compared to existing wastewater flows from these sites. This increase in sanitary sewage due to the development of the reasonably foreseeable projects represents less than 3 percent of the average daily dry weather flow to the Oceanside Water Pollution Control Plant and roughly 1 percent of the plant's secondary treatment capacity.⁶ The plant has the capacity to provide secondary treatment for up to 43 mgd. Therefore, sanitary sewage alone from the reasonably foreseeable projects would not exceed the capacity of the treatment plant

Additionally, while the total dry weather (sanitary) flows are expected to increase due to the Proposed Project and cumulative projects, the combined sewer overflow frequency, duration, and volume are all expected to decrease from the existing 6.8 times per year on average to approximately 6.5 times per year on average with separation of wastewater and stormwater flows planned in the Parkmerced Project and the San Francisco State University Master Plan.

Water quality issues related to the separate collection, treatment, and discharge of stormwater are discussed in the EIR in Section O, Hydrology and Water Quality. In particular, Impact HY-1 discusses water quality impacts on pp. V.O.10-V.O.12. See also Responses 52.6 and 52.8 for a discussion of water quality issues regarding discharge to groundwater and directly to Lake Merced.

Response 52.11

The comment states that since the EIR does not provide mitigating solutions for impacts, including transportation, it would be prudent to approve the Proposed Project rather than binding the City for the next 20 years. Mitigation Measures are identified for significant and potentially significant impacts, and are summarized in Chapter II, Summary, Table II-1: Summary of Significant Impacts and Mitigation Measures, pp. II.3-II.44. Project approvals considered by the decision-makers, including review and approval of a Development Agreement, are detailed under Chapter 56 of the Administrative Code and Section 302 of the Planning Code. Also, please see Response TR.26.1 for a discussion on the analysis of full buildout rather than by phase.

Response 52.12

The comment states that the City and County of San Francisco should create a comprehensive evaluation of all costs involved if the Proposed Project is implemented, but does not provide any specific comment on the EIR. CEQA (*CEQA Guidelines* Section 15134) states that economic or

⁶ Technical Memorandum, Water and Wastewater, p. 15.

social effects of a project shall not be treated as significant effects on the environment. Therefore an analysis of fiscal impacts is not included in this EIR.

Response 52.13

The comment offers a statement on the general nature of CEQA documents and asserts that the current approach to CEQA is inflexible and tends to mask serious degradation of impacts. As an example, the comment notes that the transportation analysis in the EIR identifies intersections that presently operate at unacceptable levels of service, and would continue to do so with traffic generated by the Proposed Project. The Project's contribution of traffic at such an intersection may be identified as a significant cumulative impact, depending on the magnitude of the contribution to the worsening of the average delay per vehicle (see p. V.E.22 for a discussion of traffic-related significance criteria). The reporting of significant and unavoidable impacts does not invalidate the analysis in the EIR.

Response 52.14

The comment states that the Draft EIR does not explain the trip generation for the Proposed Project in terms of quantitative information, but uses qualitative factors. The transportation analysis methodology is summarized in the EIR on pp. V.E.23-V.E.50. Trip generation methodology and calculations are shown on pp. V.E.41-V.E.44. More detail on this is found in the *Transportation Impact Analysis Report (TIA)* prepared for the Proposed Project. The "4D" method is a state-of-the-practice trip generation forecasting method that was developed for the U.S. Environmental Protection Agency and has been endorsed for use in project-specific and planning level analyses by several jurisdictions including the California Department of Transportation. A detailed description of how this method is used is provided in Appendix J to the TIA. It is a quantitative method that is applicable to mixed-use development and captures some of the interaction between complimentary mixes of uses within walking distance of each other.

The comment also questions how nearby development proposals such as that at 800 Brotherhood Way and San Francisco State University, as well as regional growth are accounted for in the transportation analysis. These specific development projects, and other reasonably foreseeable future projects, are included in the cumulative transportation analysis, as explained on pp. V.E.47-V.E.49, and discussed in more detail in Chapter 6 of the TIA. As summarized in the EIR, the year 2030 future baseline includes forecasts of regional growth that are in the San Francisco County Transportation Agency's travel demand model (SF-CHAMP). This model includes growth both in San Francisco and growth from zones outside the City based on the Metropolitan Transportation Commission's regional model based on land use forecasts developed by the Association of Bay Area Governments (ABAG). Because several development proposals in the

project vicinity have been under consideration or identified as potential development opportunities, they have been specifically accounted for in the transportation modeling, rather than relying on the general growth rate in the SF-CHAMP model. Therefore, the growth noted in the comment has been fully accounted for in the EIR. See also Master Response A.2, Transportation and Circulation, Section 2, in Section III.A, Master Responses, for more discussion of the development of travel demand forecasts for both the Proposed Project and for regional cumulative development.

Finally, the comment expresses concern about the elimination of the existing roundabouts in Parkmerced. A portion of the existing street system is proposed to be replaced with a street grid more like that in the rest of the City, although the axial street system leading to Juan Bautista Circle and The Commons is proposed to be retained. The open spaces created by the existing roundabouts would, in some cases be replaced with courtyards or other, more usable open space (see, e.g., the courtyard proposed where Font Boulevard intersects with the eastern part of Serrano Drive, at a location that had included a roundabout). Although roundabouts can be effective in many contexts, they can be more difficult to negotiate for pedestrians and bicycles in higher-density environments. Therefore, the replacement of roundabouts with traditional, more compact, stop-controlled intersections is overall more consistent with providing a more pedestrian- and bicycle-oriented street system.

Response 52.15

The comment states that the shadow analysis should have included public grounds and existing buildings and questions the conclusion that the availability of four hours of sunshine a day would not be a significant impact.

In Section V.I, Wind and Shadow, on pp. V.I.49-V.I.61, the EIR discusses the project's shadow impacts on public grounds, both large and small, including Lake Merced Park, Peace Park, the proposed Commons, two proposed public plazas, the proposed playgrounds, the proposed neighborhood parks, the proposed organic farm, and the proposed playing fields. The times of day and the times of year during which the shadows occur are discussed along with how the shadows would affect the use of these public grounds. Figures V.I.27 through V.I.46, pp. V.I.62-V.I.81, show the project's shadow impacts on these public grounds at five different times of day on four different days of the year.

As stated on p. V.I.48, "implementation of a project could have a potentially significant impact related to shadow if the project were to: affect, in an adverse manner, the use of any park or open space under the jurisdiction of the Recreation and Park Commission; or create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas." Under these significance criteria, the discussion of the project's shadow impacts focuses on parks, open

spaces, and recreation facilities, not existing buildings. The project's shadow impacts on existing buildings would be more appropriately addressed during the entitlement process, when decision makers could elect to modify the project's design based on how the project would affect existing buildings (i.e. blocking sunlight or reducing the amount of sunlight that reaches rooms, roof decks, balconies, etc.).

The conclusions regarding the project's shadow impacts on open spaces, parks, and recreation facilities are based on information for the entire year, not just one season. The relatively few hours of sunlight during the winter months represent the most extreme conditions. More hours of sunlight are available during the longer days of the spring, summer, and autumn months. As discussed on pp. V.I.49-V.I.61, the project's shadow impacts would not adversely affect the use of any park or open space under the jurisdiction of the Recreation and Park Commission and would not substantially affect outdoor recreation facilities or other public areas. On this basis, the project's shadow impacts on open spaces, parks, and recreation facilities would be less than significant.

The comment also opines regarding the loss of views once new towers are constructed. A discussion of view impacts as a result of construction of the new buildings is included in Section V.B, Aesthetics, pp. V.B.21-V.B.24.

July 12, 2010

RECEIVED

From: Fiona Zhong
128 Garces Drive
San Francisco, CA 94132

JUL 12 2010
CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

To: Mr. Bill Wycko, Environmental Review Officer
San Francisco Planning Department
1650 Mission Street – Suite 400
San Francisco, California 94103

Re: Draft EIR – Parkmerced Project (Case No. 2008.0021E)

Dear Mr. Wycko:

I have lived in my Parkmerced garden apartment for the past 18 years. I am writing this letter to contest some of your results in the Parkmerced Project Draft EIR (Planning Department: Case No. 2008.0021E).

- 1. **Impact AQ-3 (V.G.24)** – Construction of the proposed project could expose persons to substantial levels of toxic air contaminants, which may lead to adverse health affects. (Significant and Unavoidable)

The mitigation that the agency has proposed does not address people who live in close proximity to the construction site, who will be exposed to toxic air pollutants resulting from the construction on a daily basis. Hence the residents' exposure to such toxic air contaminants will be significantly increased. The agency has not addressed the toxic air contaminants exposure levels that residents will be exposed to and its health impact to the residents.

53.1

Because of the large scale and extended time of the proposed project, the agency has not addressed the long term health effects to the residents who live within the proposed project site during and after the construction period.

53.2

The agency has also not addressed the significant health impact on people who have chronic respiratory illness, immune deficient individuals or elderly people who live in the construction site.

53.3

2. *Wildlife – Project Site (V.M.5)*

The agency only spent one day in 2008 (June 27, 2008) and one day in 2009 (June 7, 2009) to observe the wildlife in the proposed project site. As such, the agency has not adequately monitored and characterized the wildlife habitat that could be unique to Parkmerced.

53.4

3. *Impact B1-4 (V.M.27) - Removing trees and shrubs could remove migratory bird habitat and impede the use of nesting (nursery) sites. (Less than significant with mitigation)*

The mitigation has not adequately addressed the loss of trees in large quantities, as well as losing well established and matured trees before construction has begun. Even if young trees will be planted afterwards, these young trees will not be able to replace the matured trees as nesting sites for birds in the many years to come. The loss of dense vegetation landscape currently established in Parkmerced will definitely impact migration birds using Parkmerced trees as stopover. The agency's conclusion of removing trees and shrubs as less than significant is inaccurate.

53.5

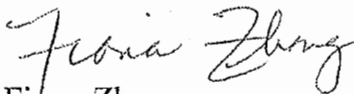
53.6

4. *Impact of loss of open space (not in report)*

The agency has not address the critical issue of the loss of vast areas of open space from the proposed project, nor does it have a mitigation plan.

53.7

Sincerely,



Fiona Zhong

cc: San Francisco Board of Supervisors

RECEIVED

JUL 12 2010

CITY & COUNTY OF S.F.
PLANNING DEPARTMENT
RECEPTION DESK

RESPONSES TO LETTER 53

Fiona Zhong, July 12, 2010

Response 53.1

The comment asserts that analysis in the Draft EIR for toxic air contaminants does not properly account for construction impacts due to daily exposure. Section V.G, Air Quality, pp. V.G.24-V.G.26, describes the potential increased risk from exposure to emissions of diesel particulate matter and toxic air contaminants. Where impacts could be potentially significant, mitigation measures are identified to reduce the adverse public health impacts of the Proposed Project. In some cases, the impacts would be significant and unavoidable (for example, construction-related emissions in Impact AQ-3, p. V.G.24), and the EIR concludes that this impact would continue to be significant with the mitigation being implemented (Mitigation Measure M-AQ-3, pp. V.G.25-V.G.26). In addition, Impact HZ-2, in Section V.P, Hazards and Hazardous Materials, p. V.P.10, discusses an accidental release of hazardous materials, including asbestos-containing materials, during demolition. Please refer to Response TR.17.4 for further discussion of asbestos and toxic air contaminants due to construction activity.

Response 53.2

The comment asserts that the Draft EIR does not address long-term health effects. The Draft EIR considers the possibility that residents occupy and remain on-site throughout the construction of the Proposed Project and throughout the life of the project. Some health effects identified in the DEIR are long-term in nature. Section V.F, Noise, p. V.F.3, and Section V.G, Air Quality, p. V.G.6, are two examples of issues studied in the EIR that have long-term effects. Please see also Response 53.3, below.

Response 53.3

The comment asserts that the Draft EIR does not address health effects on the elderly and infirm. The elderly and infirm populations are described as “sensitive receptors” who would experience noise and air quality impacts (Sections V.F, Noise, p. V.F.11, and V.G, Air Quality, pp. V.G.10-V.G.11). To the extent that the elderly and ill exist routinely in residential uses, this population is expected to be present on site throughout construction phasing.

Response 53.4

The comment states that the EIR biologists conducted only two days of reconnaissance-level surveys and that the analysis is inadequate. As stated in Section V.M, Biological Resources, p. V.M.1, reconnaissance-level field surveys of the Project Site, the southeast corner of the junction of Brotherhood Way and Lake Merced Boulevard, and the southeastern shore of Lake

Merced were conducted on May 9, 2008 and June 17, 2009. Additional breeding bird surveys were conducted on June 1 and 27, 2008, and a preliminary assessment of bird movement across Lake Merced Boulevard was conducted on June 17, 2009, to assess potential impacts from wind turbines. Follow-up plant and habitat surveys were conducted on June 27 and June 30, 2009.

The biological report on which the EIR was based was prepared using reconnaissance-level surveys, which are standard and an appropriate level of field analysis for an EIR under CEQA standards, particularly in dense urban areas where the diversity of native habitats is low. Five site visits were conducted between June and July. Though the number of site visits may not be sufficient to detect the occasional rare vagrant songbird or every single species that uses the site, they are sufficient to assess the potential for resident species to occur based on the habitat conditions observed. A year-long biological survey of the site would not change the analysis or conclusions on the Project Site's value for migratory and resident wildlife.

Response 53.5

The comment asserts that the Draft EIR does not adequately address mitigation for the large amount of tree removal activity that will occur, as well as the loss of established and mature trees. As described in Section V.M, Biological Resources, pp. V.M.28-V.M.29, the Project Site contains over 1,500 trees. Many of the trees are in poor condition, and such trees are regularly assessed for removal and replacement in an existing, ongoing maintenance program for the site. The maintenance program includes seasonal restrictions and nest avoidance in compliance with the CDFG and the Migratory Bird Treaty Act (MBTA). As described in Chapter III, Project Description, p. III.23 and pp. III.54-III.65, tree removal activity would occur in phases over an approximately 20-year period. As such, only a portion of the site's existing trees would be removed during any given period. By Phase 4, trees that were planted during Phase 1 will have become mature and functional as urban wildlife habitat. The EIR acknowledges on pp. V.M.27-V.M.28 that the loss of trees over the 20-year development period constitutes a short-term impact, but this short-term impact will be offset by the fact that 3,630 new trees would be planted, most of which would provide suitable nesting habitat for urban birds, including raptors, and migratory stopover habitat.

Response 53.6

The comment asserts that the removal of trees and other landscaping on the Project Site would impact migratory birds. Please see Response TR.17.2, in Section III.B, Public Hearing Comments and Responses.

Response 53.7

The comment states that the loss of open space is not discussed or mitigated. As stated in Chapter III, Project Description, on p. III.6, and as shown on Figure III.5: Existing Open Space Plan, on p. III.13, the existing conditions at Park Merced include 75 acres (3,269,300 square feet) of open space, none of which is Recreation and Parks property. The proposed project would result in the loss of 7 acres of open space, or 305,100 square feet, which amounts to a 10 percent reduction in the amount of open space provided on the Project Site. As described in Section V.J, Recreation, on p. V.J.5, the parks and open space on the Parkmerced site are not publicly-owned recreational resources, although they are for the most part, publicly accessible. The EIR concludes on p. V.J.10 that although the Proposed Project would cause a decrease in publicly accessible open space, this decrease would not result in a significant loss of open space or recreational facilities, given the large amount of public open space in the vicinity of the Project Site, and no mitigation measures are required.