

## IV. DRAFT EIR REVISIONS

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This section presents text changes for the *Parkmerced Project Draft Environmental Impact Report*. The Draft EIR text changes reflect revisions developed in response to comments and staff-initiated text changes to clarify information. The revisions are organized by EIR section and, as in the responses in this Comments and Responses document, deleted text is ~~struck through~~ and new text is underlined. The text additions and revisions presented below clarify and expand the information presented in the Draft EIR. The revised text does not provide new information that identifies new significant environmental impacts; the clarified and expanded information does not identify mitigation measures that, if implemented, would result in significant environmental impacts; and considerably different alternatives and/or mitigation measures were not identified that would clearly lessen the significant environmental impacts of the proposed project.

### CHAPTER I, INTRODUCTION

The following staff-initiated text change has been made to the last sentence of the first paragraph on p. I.2:

The Project Site is at 3711 19<sup>th</sup> Avenue on Assessor's Blocks 7303, 7303A, 7308, 7309, 7309A, 7310-7311, 7314, 7315-7323, 7316, 7319 7325-7326, 7330-7345, 7333 A-~~EB~~, 7333E, 7345 A-CB, and 7353-7373 7356-7370.

### CHAPTER II, SUMMARY

The following staff-initiated text change has been made to the last sentence of the second paragraph on p. II.1:

The Project Site is at 3711 19<sup>th</sup> Avenue on Assessor's Blocks 7303, 7303A, 7308, 7309, 7309A, 7310-7311, 7314, 7315-7323, 7316, 7319 7325-7326, 7330-7345, 7333 A-~~EB~~, 7333E, 7345 A-CB, and 7353-7373 7356-7370.

### CHAPTER III, PROJECT DESCRIPTION

The following staff-initiated text change has been made to the second sentence of the first full paragraph on p. III.4:

The Project Site is at 3711 19<sup>th</sup> Avenue on Assessor's Blocks 7303, 7303A, 7308, 7309, 7309A, 7310-7311, 7314, 7315-7323, 7316, 7319 7325-7326, 7330-7345, 7333 A-~~EB~~, 7333E, 7345 A-CB, and 7353-7373 7356-7370.

The following text change has been made to the third sentence of the last paragraph on p. III.4 in Chapter III, Project Description:

Over ~~many~~ the past decades, various blocks of the original development complex have been subdivided and sold to third parties.

The following staff-initiated text change has been made to footnote 3 on p. III.6:

As defined in the San Francisco Public Works Code Article 16: Urban Forestry Ordinance, Section 810A, a significant tree is a tree: (1) on property under the jurisdiction of the Department of Public Works or (2) on privately owned property with any portion of its trunk within 10 feet of the public right-of-way, and (3) that satisfies at least one of the following criteria: (a) a diameter at breast height (DBH) in excess of twelve (12) inches, (b) a height in excess of twenty (20) feet, or (c) a canopy in excess of fifteen (15) feet.

The following staff-initiated text change has been made in the fifth and last sentences of the third paragraph on p. III.16:

New athletic playing fields would be provided for sports including but not limited to lacrosse, soccer, baseball, and softball, community gardens, an organic farm, an off-leash dog area<sup>6</sup>, and walking and biking paths would be added to serve the residents, neighboring community, and adjacent schools. These facilities would be owned and maintained by the Project Sponsor and would not place any additional burden on the San Francisco Recreation and Park Department.

A staff-initiated text change has been made to Figure III.14: Proposed Bicycle Plan, on p. III.39. The revised figure is shown on p. IV.3.

To clarify the description of the proposed stormwater treatment and disposal plans, the following new text has been inserted after the sixth sentence of the second full paragraph 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.

The following staff-initiated text change has been made to the last paragraph on p. III.52:

The Proposed Project would involve substantial excavation, specifically for construction of the below-grade parking garages. A total of about 1,249,000 ~~1,159,000~~ cubic yards of cut and 507,000 ~~664,350~~ cubic yards of fill would be necessary over the approximately 20-year development period. The Grading Plan provides as much on-site reuse as possible, and most of the earthwork would be stockpiled and reused as fill throughout the



SOURCE: SOM, Turnstone Consulting

**PARKMERCED PROJECT**

- - - - PROJECT BOUNDARY
- PROPOSED BIKE PATH DEDICATED OFF-STREET, PAVED
- EXISTING SF CITY BIKE PATH DEDICATED OFF-STREET, PAVED
- PROPOSED BIKE LANE DEDICATED LANE ON ROADWAY
- EXISTING SF CITY BIKE LANE DEDICATED LANE ON ROADWAY
- EXISTING SF CITY WIDE CURB LANE BIKE ROUTE WIDER ROADWAY
- PROPOSED SFSU BIKE ROUTE BIKE AND CARS SHARE ROADWAY
- EXISTING SF CITY BIKE ROUTE NUMBER
- PROPOSED BIKE LIBRARY
- - - - EXISTING SF CITY BIKE ROUTE BIKE AND CARS SHARE

IN GENERAL, THE STREETS WITHIN PARKMERCED WOULD BE RESIDENTIAL TYPE STREETS IN WHICH BICYCLES WOULD SHARE THE ROADWAY WITH AUTOMOBILES. EACH ROADWAY WOULD NOT SPECIFICALLY BE DESIGNED AS A BICYCLE ROUTE.

**FIGURE III.14: PROPOSED BICYCLE PLAN (REVISED) IV.3**



Project Site. However, a total of about ~~687,000~~ 494,650 cubic yards of off-haul would be generated during the approximately 20-year development period. The Grading Plan identifies local sources to use the clean fill removed from the site.

The following staff-initiated text change has been made in the third full sentence of the first paragraph on p. III.65:

Grading during Phase 1 would require about ~~400,000~~ 401,750 cubic yards of cut and about ~~80,000~~ 129,600 cubic yards of fill.

The following staff-initiated text change has been made in the sixth sentence of the second paragraph on p. III.65:

Grading during Phase 2 would require about ~~118,000~~ 119,450 cubic yards of cut and about ~~154,000~~ 201,300 cubic yards of fill.

The following staff-initiated text change has been made in the fifth sentence of the third paragraph on p. III.65:

Grading during Phase 3 would require about ~~261,000~~ 230,150 cubic yards of cut and about ~~197,000~~ 349,100 cubic yards of fill.

The following staff-initiated text change has been made in the last sentence of the last paragraph on p. III.65:

Grading during Phase 4 would require about ~~470,000~~ 430,500 cubic yards of cut and about ~~77,000~~ 58,600 cubic yards of fill.

The third bullet under “Project Approvals” on p. III.66 has been revised, as follows:

- Approval of amendments to the Planning Code Height and Bulk Maps and the *General Plan* Urban Design Element height map to permit ~~allocate a lesser number of units than permitted under existing zoning, and in~~ additional three- to six-story buildings, to allow for a limited number of new mid-rise and tower buildings (Board of Supervisors).
- **CHAPTER V, ENVIRONMENTAL SETTING AND IMPACTS**
- **Section V.C, Population and Housing**
- The following staff-initiated text change has been added in the third sentence of the last paragraph on p. V.C.13, and to the top of 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.<sup>34</sup>

The following staff-initiated text change has been made in footnote 34 on p. V.C.14:

<sup>34</sup> The Project Sponsor proposes to retain 1,683 ~~1,693~~ existing units, replace 1,538 ~~1,539~~ 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.~~

#### **Section V.D.a, Historic Architectural Resources**

For clarification, 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 is 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.

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

#### **Mitigation Measure M-CR-1: Documentation and Interpretation**

##### 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 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.

### **Section V.D.b, Archaeological Resources**

The following staff-initiated text change has been made to the first paragraph of Mitigation Measure M-CR-3a, on p. V.D.45:

Based on a reasonable presumption that archaeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of an ~~a~~ qualified archaeological

consultant from the Planning Department (“Department”) pool of qualified archaeological consultants as provided by the Department archaeologist, having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall undertake an archaeological testing program as specified herein. In addition, the consultant shall be available to conduct an archaeological monitoring and/or data recovery program if required pursuant to this measure. The archaeological consultant’s work shall be conducted in accordance with this measure and the requirements of the ARDTP (Archeo-Tec, Archeological Research Design and Treatment Plan, Parkmerced Project, March 2010) at the direction of the Environmental Review Officer (ERO). In instances of inconsistency between the requirements of the project ARDTP and the requirements of this mitigation measure, the requirements of this archaeological mitigation measure shall prevail. All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archaeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less-than-significant level potential effects on a significant archaeological resource as defined in CEQA Guidelines Section 15064.5 (a)(c).

The following staff-initiated text change to Measure M-CR-3a has been made to the second full paragraph on p. V.D.48:

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive two copies (bound and unbound) and one unlocked, searchable PDF copy on a CD or DVD of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

The following staff-initiated text change has been made to Mitigation Measure M-CR-3b, on pp. V.D.48-V.D.49:

**Mitigation Measure M-CR-3b: Archaeological Treatment Plan for Subsequent Project Phases Phases II-IV**

Based on a reasonable presumption that archaeological resources may be present within the Project Site, the following measures shall be undertaken to avoid any potentially significant adverse effect from subsequent project phases Phases II-IV of the Proposed Project on buried archaeological resources. The Project Sponsor shall retain the services of a qualified archaeological consultant having expertise in California prehistoric and urban historical archaeology. The archaeological consultant shall prepare an archaeological treatment plan (TP). The archaeological consultant’s work shall be conducted in accordance with this measure at the direction of the Environmental Review



Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO.

Archaeological Treatment Plan. The archaeological consultant shall meet and consult with the ERO on the scope of the TP prior to preparation of the TP. The TP shall be submitted to the ERO for review and approval prior to the Project ground-breaking activities for subsequent project phases Phases II-IV. Archaeological field investigations for subsequent project phases Phases II-IV shall be conducted in accordance with the approved TP. The TP shall identify project-specific vertical / horizontal areas of archaeological sensitivity and appropriate archaeological identification and evaluation strategies, and archaeological mitigatory protocols applicable to specific project activities / improvements (for example, excavation building foundation installation, grading, etc.) with the potential to affect archaeological properties. Mitigation strategies requiring archaeological testing plans (ATP) and archaeological monitoring plans (AMP) shall conform to the requirements for preparation and implementation including preparation of archaeological investigation and data recovery results reporting of an ATP and AMP in Mitigation Measure M-CR-3a.

### **Section V.E, Transportation and Circulation**

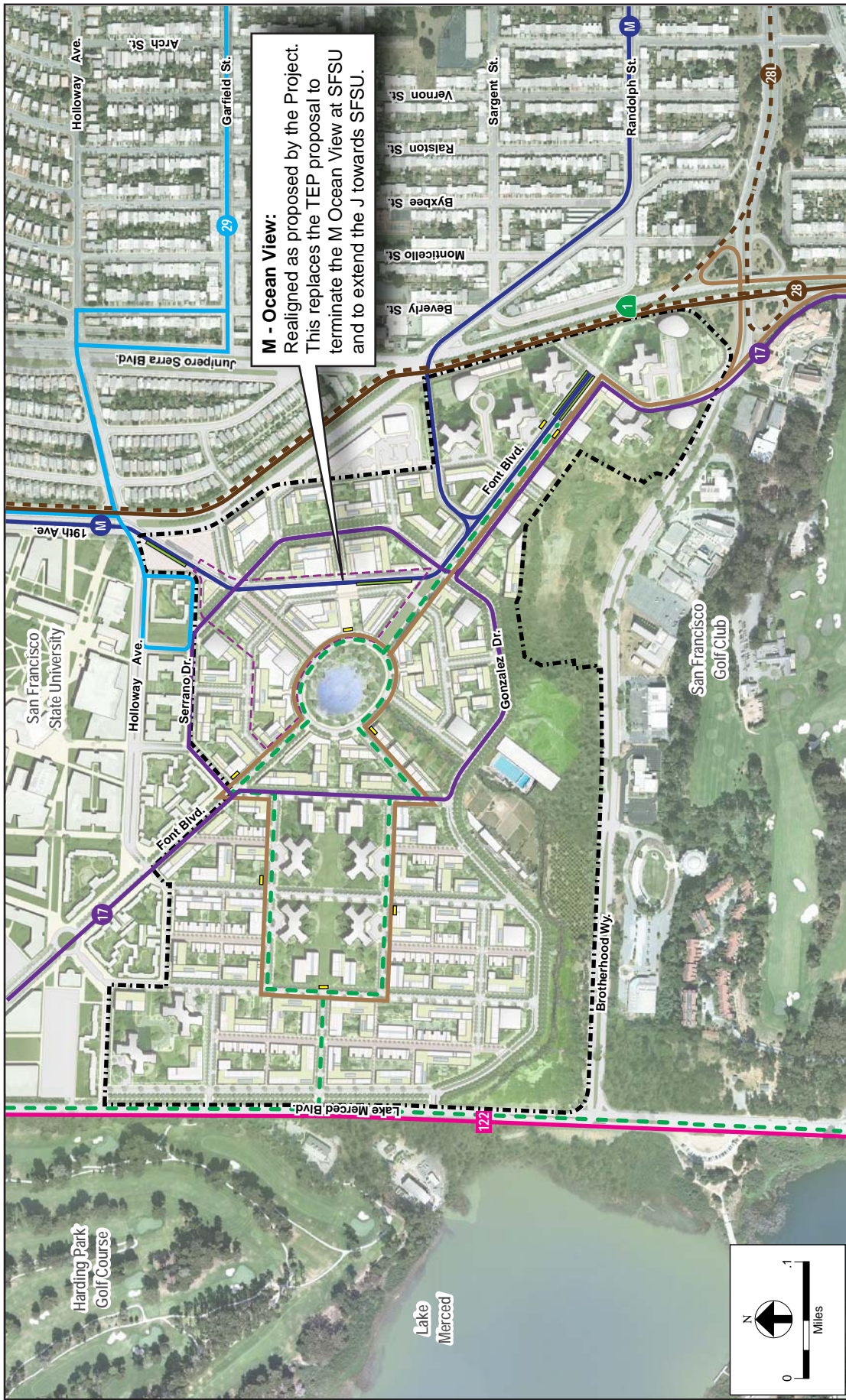
A staff-initiated text change has been made to Figure V.E.4: Proposed Transit Improvements, on p. V.E.33. The revised figure is shown on p. IV.10.

The following staff-initiated text change is added as a new second bullet on p. V.E.34:

- Improvements would be made to three existing Muni routes. The 17 Parkmerced line would be modified within Parkmerced to improve connections to the major centers within the neighborhood. The 19<sup>th</sup> Avenue/Holloway Avenue stop location for the 28/28L 19<sup>th</sup> Avenue/19<sup>th</sup> Avenue Limited would be relocated from the north side of the intersection to the south side of the intersection, adjacent to the proposed new M Ocean View transit station. The 29 Sunset line, which currently runs through a portion of Parkmerced to connect between southbound 19<sup>th</sup> Avenue and eastbound Holloway Avenue because left-turns are not permitted at the intersection, would be relocated from Crespi Drive to a loop off Holloway Avenue, where operating conditions are better than 19<sup>th</sup> Avenue. In addition, a new stop location for the 29 Sunset line would be provided on the west side of the proposed new M Ocean View transit station.

The following staff-initiated text change has been made to the first two bulleted items on p. V.E.38:

- Class I<sup>9</sup> bike paths (paved, off street) along the proposed Gonzalez Drive from Lake Merced Boulevard to Serrano Drive, and along Font Boulevard from Chumasero Drive to Gonzalez Drive;
- Class II<sup>10</sup> bike lanes on Vidal Drive, Pinto Avenue, Tapia Drive, Rivas Drive<sup>11</sup>, and a portion of Arballo Drive and Chumasero Drive;



**FIGURE V.E.4: PROPOSED TRANSIT IMPROVEMENTS (REVISED)**

A staff-initiated text change has been made to Figure V.E.6: Proposed Bicycle Circulation Improvements, on p. V.E.39. The revised figure is shown on p. IV.12.

The following staff-initiated text change is added to the last bullet item on p. V.E.40:

- 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.

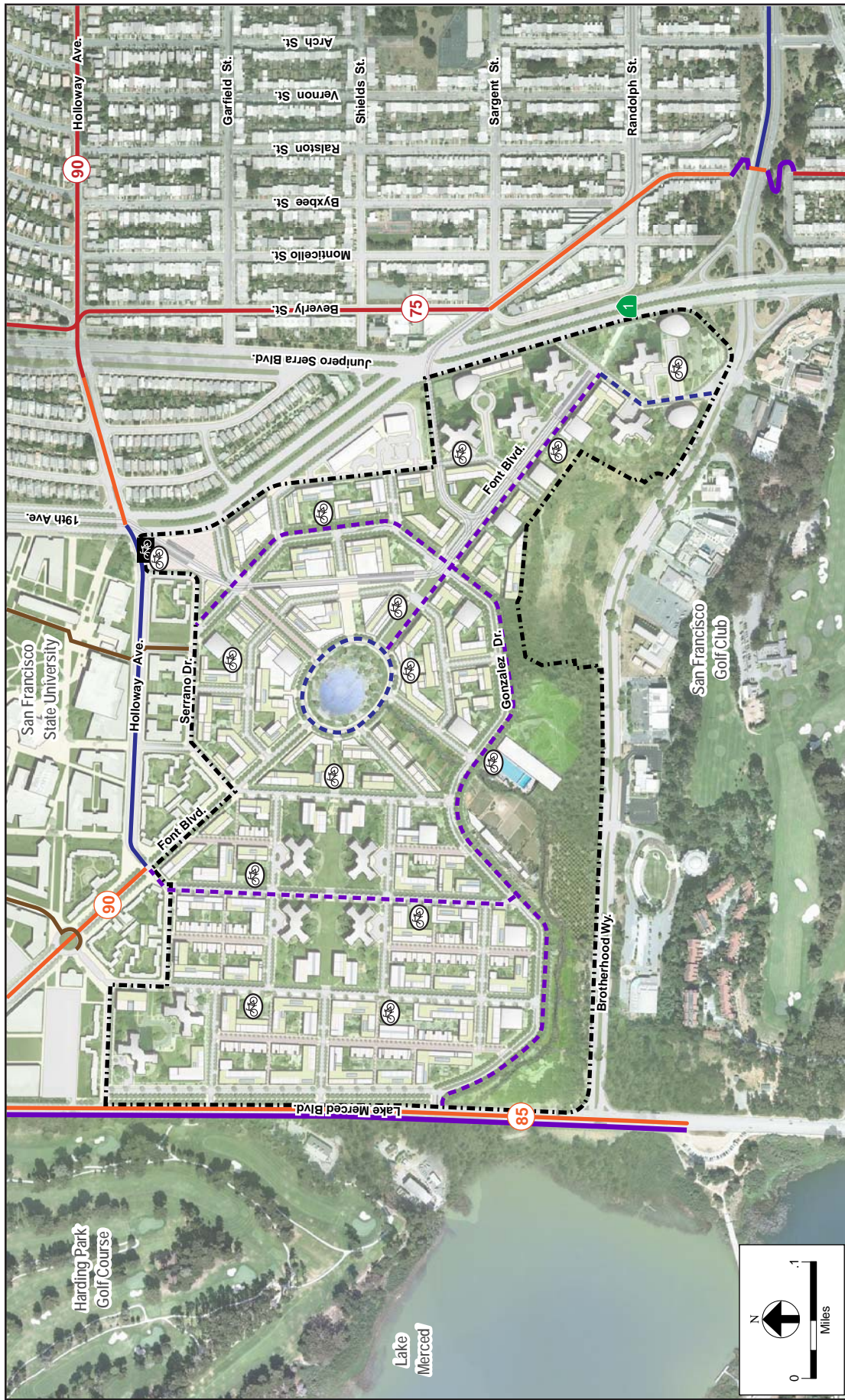
The following staff-initiated text change has been made in the “Total” column of Table V.E.9: Proposed Project Parking Demand, on p. V.E.47:

13,409 13,490

The following staff-initiated text change has been made to last paragraph on p. V.E.64:

#### Summary of Impact TR-2

One of the seven intersections (19<sup>th</sup> Avenue/Sloat Boulevard) identified under Impact TR-2 was determined to be a significant and unavoidable impact due to no vehicular capacity improvements being feasible. Overall, Of the remaining six intersections, implementation of mitigation measures M-TR-2A through M-TR-2E would improve operations at some of the seven study intersections. However, in a number of cases, the feasibility of mitigation measures is uncertain. Implementation of mitigation measures beyond below that would require discretionary approval actions by the SFMTA or other public agencies is considered uncertain because public agencies subject to CEQA cannot commit to implementing any part of a proposed project, including proposed mitigation measures, until environmental review is complete. Thus, while the 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 this EIR. If mitigation measures M-TR-2A through M-TR-2E were fully implemented, five of the intersections would improve to a less than significant impact. However, five of the intersections were determined to be significant and unavoidable due to pedestrian safety conflicts or the need for further study by SFMTA. Even with implementation of all mitigation measures, six of the seven intersections would continue to operate unacceptably. Only impacts of 19<sup>th</sup> Avenue / Crespi Drive could be mitigated to a less-than-significant level. Therefore, Impact TR-2 would remain significant and unavoidable.

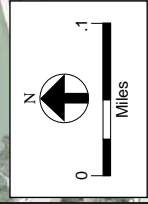


SOURCE: SOM, Turnstone Consulting

- CLASS III BIKE ROUTE: BIKE AND MOTOR VEHICLES SHARE ROADWAY
- CLASS I BIKE PATH
- EXISTING SF CITY BIKE ROUTE NUMBER
- - - PROPOSED CLASS I BIKE PATH: DEDICATED OFF-STREET, PAVED
- - - PROPOSED CLASS II BIKE LANE: DEDICATED ON-STREET
- CLASS III WIDE CURB LANE: BIKE ROUTE WIDER ROADWAY
- CLASS II BIKE LANE
- SFSU CLASS III BIKE ROUTE: BIKE AND MOTOR VEHICLES SHARE ROADWAY
- 85 PROPOSED BIKE STATION
- 86 BIKE REPAIR SHOP

In general, the streets within Parkmerced would be residential type streets in which bicycles would share the roadway with automobiles. Each roadway would not specifically be designed as a bicycle route.

**PARKMERCED PROJECT**



**FIGURE V.E.6: PROPOSED BICYCLE CIRCULATION IMPROVEMENTS (REVISED)**

The following staff-initiated text change has been made to the third full paragraph on p. V.E.68:

Summary of Impact TR-3

Both intersections identified under Impact TR-3 would require substantial improvement, which could only be accomplished through major changes. Due to the generally constrained environment and complex intersection geometry, space for additional travel lanes could not be allocated. To accommodate additional right-of-way needed for additional lanes, demolition of adjacent land uses and substantial right-of-way acquisition would be required. Therefore, traffic impacts at these intersections under the Project conditions would remain significant and unavoidable.

~~Mitigation Measure M-TR-2C would involve constructing a new northbound right-turn lane from Lake Merced Boulevard into eastbound Winston Drive. Overall, implementation of mitigation measure M-TR-2C would improve operations at one of the three study intersections. However, the feasibility of this mitigation measure is uncertain, and even with implementation of mitigation measure M-TR-2C, one intersection would continue to operate unacceptably. Therefore, Impact TR-3 would remain significant and unavoidable.~~

The following staff-initiated text change has been to the second and third paragraphs of Impact TR-12, on p. V.E.80:

**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 cars 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 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.~~

The following staff-initiated text change has been made to the second bullet under M-TR-22B, on p. V.E.90:

- Southbound queue-jumps are viable at State Drive and Font Boulevard with removal of on-street parking. However, these treatments may conflict with mitigation measures M-TR-2C, ~~M-TR-2D~~, and M-TR-2E (collectively summarized in M-TR-22A), which have been designed to reduce the Project's traffic impacts.

The following staff-initiated text change has been made to the third full paragraph, on p. V.E.93:

Implementation of mitigation measure M-TR-24 (i.e., implement the Project Variant) would improve transit travel times on the 28 19<sup>th</sup> Avenue and 28 19<sup>th</sup> Avenue Limited. However, because implementation of the Project Variant is uncertain, this mitigation measure may not be feasible. Thus, the Project's impacts to the 28 19<sup>th</sup> Avenue and 28 19<sup>th</sup> Avenue Limited in the PM peak hour would remain significant and unavoidable. implementation would require substantial study and public outreach, and would result in secondary traffic impacts associated with the removal of a mixed-flow traffic lane. Further, implementation of the Project Variant would require discretionary approval actions by the SFMTA or other public agencies, which is considered uncertain because public agencies subject to CEQA cannot commit to implementing any part of a proposed project, including proposed mitigation measures, until environmental review is complete. This measure would also require approval by Caltrans, which is responsible for improvements to this section of 19<sup>th</sup> Avenue. Because of the amount of additional study required and the multiple jurisdictions that would be required to adopt it, its feasibility is uncertain. Therefore, Project-related impacts on this route would remain significant and unavoidable.

On p. V.E.103, the following staff-initiated text change has been made to the final row, "Total Demand (*SF Guidelines*)," in Table V.E.12: Summary of Proposed Project Parking Supply, Demand, and Code Requirements, and to the two paragraphs after the table:

Parking Spaces:	<del>14,190</del> <u>13,409</u>
Shortfall: -	<del>3,059</del> <u>-3,959</u>

Overall, the Project proposes 11,131 parking spaces, including 1,681 on-street spaces and 9,450 off-street spaces. Of these spaces, fewer would be distributed on the eastern side of the Project Site where transit is more readily accessible and more would be provided on the western side of the site. The majority of off-street parking would be provided by basements constructed below the residential, retail, office and fitness uses.

The *SF Guidelines* methodology for estimating parking demand was used to calculate the parking demand associated with the land uses for the Proposed Project. The calculation identified a total demand of ~~14,190~~ 13,409 parking spaces. The parking demand calculations represent the number of spaces that would be required in order to accommodate all the vehicles anticipated to result from the Proposed Project if the proposed parking supply was unconstrained.

The following staff-initiated text change has been made to the last two paragraphs on p. V.E.113 and the first seven lines on p. V.E.114:

Summary of Impact TR-36

Overall, implementation of mitigation measures M-TR-36A through M-TR-36EF would improve operations at some of the study intersections. However, in a number of cases, the feasibility of mitigation measures is uncertain. Implementation of mitigation measures below that would require discretionary approval actions by the SFMTA or other public agencies is considered uncertain because public agencies subject to CEQA cannot commit to implementing any part of a proposed project, including proposed mitigation

measures, until environmental review is complete. Thus, while the 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 this EIR. Therefore, Impact TR-36 would remain significant and unavoidable.

~~**M-TR-36A: Retime signal at Junipero Serra Boulevard/Ocean Avenue/Eucalyptus Drive to allocate more green time to the east-west movements.**~~ Under future year 2030 conditions, adjustments to the traffic signal timing at this intersection could likely improve operations to within acceptable levels, based on forecasted traffic increases. Implementing this mitigation measure would achieve acceptable operations at this intersection. However, signals along the Junipero Serra Boulevard corridor are coordinated such that they operate as a system, rather than isolated signals. Traffic progression relies on the interconnectivity between each signal. Retiming this particular intersection may require evaluation of the corridor. SFMTA would be responsible for evaluating and implementing a new signal timing plan. Implementation shall be completed prior to completion of the Project or as otherwise specified in the Development Agreement.

~~Implementation of mitigation measure M-TR-36A would improve operations at this intersection to acceptable levels. However, 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 be significant and unavoidable.~~

The following staff-initiated text change has been made to the second and third full paragraphs on p. V.E.114:

**M-TR-36AB: Retime signal at 19<sup>th</sup> Avenue/Holloway Avenue to allocate more green time to the east-west movements.** Implementing this mitigation measure would achieve acceptable operations at this intersection. However, 19<sup>th</sup> Avenue is a coordinated corridor with closely spaced intersections. Traffic progression relies on the interconnectivity between each signal. Retiming this particular intersection would require evaluation of the corridor. SFMTA would be responsible for evaluating and implementing a new signal timing plan. Implementation shall be completed prior to completion of the Project or as otherwise specified in the Development Agreement.

Implementation of mitigation measure M-TR-36AB would achieve acceptable operations at this intersection. However, 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.

The following staff-initiated text change has been made to the fourth through sixth full paragraphs on p. V.E.114:

**M-TR-36BC: Construct a dedicated westbound right-turn lane and convert the shared westbound through/right-turn lane to a dedicated westbound through lane at the Brotherhood Way/Chumasero Drive intersection.**



Implementation of this mitigation measure would improve operations at this intersection to acceptable LOS D during the PM peak hour under 2030 cumulative conditions.

Construction of this mitigation measure would require roadway widening into the Project Site, ~~but no major structural reconfigurations would be required.~~ However, if the existing pedestrian overcrossing across Brotherhood Way at this intersection remains, widening the roadway to implement this measure may not be feasible due to conflicts with structural support columns for the overcrossing. Implementation of the intersection reconfiguration shall be the responsibility of SFMTA, and shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement. SFMTA shall design and implement the measure as necessary; however, SFMTA is not financially responsible for funding this improvement or evaluating its feasibility.

With implementation of mitigation measure M-TR-36BC, acceptable LOS could be achieved and the cumulative impact would be reduced to less than significant. However, 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.

The following staff-initiated text change has been made to last three lines on p. V.E.114 and the first nine lines on p. V.E.115:

**M-TR-36CD: Install a traffic signal at Lake Merced Boulevard/John Muir Drive.** Installation of a traffic signal at the intersection of Lake Merced Boulevard/John Muir Drive would improve operations to acceptable levels. Implementation of the signal installation shall be the responsibility of SFMTA, and shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement. The SFMTA shall design and implement the measure as necessary; however, SFMTA is not financially responsible for funding this improvement or evaluating its feasibility.

Implementation of mitigation measure M-TR-36CD would improve intersection operations to acceptable levels. The Project Sponsor should contribute a fair-share toward funding this mitigation measure. However, because there is no funding mechanism in place to provide full funding for this measure, its feasibility is uncertain. Therefore, the Project's contribution to cumulatively significant impacts at this intersection would remain significant and unavoidable.

The following staff-initiated text change has been made to the second and third full paragraphs on p. V.E.115:

**M-TR-36DE: Convert the dedicated southbound through lane into a dedicated left-turn lane at John Daly Boulevard/Lake Merced Boulevard.** This would result in the southbound approach consisting of a shared through-right-turn lane and triple left-turn lanes. To achieve adequate lane utilization, John Daly Boulevard would have to be configured to have three eastbound through travel lanes east of the intersection. This would require the removal of

some pedestrian elements and converting the existing right-turn lane into the Westlake Shopping Center into a shared through/right-turn lane. If feasible, this measure shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement.

Implementation of mitigation measure M-TR-36~~DE~~ would achieve acceptable operations at this intersection. The Project sponsor would be responsible to fund a “fair share” contribution towards the implementation of mitigation measure M-TR-36~~DE~~. However, there is no mechanism identified to collect the remaining funding for implementing this mitigation measure, and its full funding is uncertain. Furthermore, the improvements identified above would be the responsibility of Daly City and could not be implemented by San Francisco. Therefore, the Proposed Project’s contribution to cumulatively significant impacts at this intersection would remain significant and unavoidable.

The following staff-initiated text change has been made to the last two paragraphs on p. V.E.115:

**M-TR-36~~DE~~EF: Install an auxiliary lane from Brotherhood Way through the Lake Merced Boulevard/Gonzalez Drive intersection to provide three northbound through lanes.** Installation of the auxiliary lane shall be the responsibility of SFMTA, and shall be implemented prior to completion of the Project or as otherwise specified in the Development Agreement; however, SFMTA is not financially responsible for funding this improvement. The SFMTA shall design and implement the measure as necessary. SFMTA is currently evaluating the feasibility of this measure and has not yet finalized its evaluation.

With implementation of mitigation measure M-TR-36~~DE~~EF, operations at this intersection would improve to acceptable LOS D or better conditions in the PM peak hour. However, because further study is required to determine feasibility of this mitigation measure, its feasibility is uncertain. Therefore, the Project’s contribution to cumulatively significant impacts at this intersection would remain significant and unavoidable.

The following staff-initiated text change has been made to the second paragraph under Impact TR-44 on p. V.E.123:

**The northeast screenline** (consisting solely of the M Ocean View light rail line) would experience capacity utilization greater than Muni’s capacity utilization threshold of 85 percent in the AM peak hour in the inbound (toward Downtown) direction. In the PM peak hour, ridership would exceed Muni’s capacity utilization threshold of 85 percent in both the inbound (toward Downtown) and outbound (away from Downtown) directions. ~~As described in Impact TR-12 for existing plus project conditions, Implementation of Mitigation Measure M-TR-12 would increase~~ing the capacity on this Study Area screenline ~~is not~~but may not be feasible ~~without major systemwide changes~~, and therefore the Proposed Project’s contribution to cumulatively significant impacts on this Study Area screenline would remain significant and unavoidable.

The following staff-initiated text change has been made to the impact statement in Impact TR-45, on p. V.E.124:

**Impact TR-45: Implementation of the Project Variant would result in significant impacts on the same Muni Study Area Screenlines as identified in Impact TR-4443 for the Proposed Project. (Significant and Unavoidable)**

The following staff-initiated text change has been made to the impact statement in Impact TR-46, on p. V.E.124:

**Impact TR-46: Implementation of the sub-variant, either in conjunction with the Proposed Project or the Project Variant, would result in significant impacts on the same Muni Study Area Screenlines as identified in Impact TR-4443 for the Proposed Project. (Significant and Unavoidable)**

#### **Section V.F, Noise**

The following staff-initiated text change has been added to the first paragraph under Impact NO-1, on p. V.F.17:

Construction activities that would be associated with the Proposed Project are anticipated to occur continuously for approximately 20 years. Construction activities would include site preparation, grading, placement of infrastructure, placement of foundations for structures, and fabrication of structures. Demolition, excavation, and construction activities would require the use of heavy trucks, excavating and grading equipment, material loaders, cranes, concrete breakers, a concrete or asphalt crusher, and other mobile and stationary construction equipment.

#### **Section V.G, Air Quality**

The following staff-initiated text change has been added to the first paragraph under Impact AQ-2, on p. V.G.23:

Construction of the Proposed Project is anticipated to occur over approximately 20 years. Construction activities would include site preparation, grading, placement of infrastructure, placement of foundations for structures, and fabrication of structures. Demolition, excavation and construction activities would require the use of heavy trucks, excavating and grading equipment, material loaders, cranes, concrete breakers, a concrete or asphalt crusher, and other mobile and stationary construction equipment. Emissions during construction would be caused by materials handling, traffic on unpaved or unimproved surfaces, demolition of structures, use of paving materials and architectural coatings, exhaust from construction worker vehicle trips, truck trips, and exhaust from engines powering construction equipment such as generators, portable equipment, loaders, graders, and cranes. Although not required to be quantified under current BAAQMD CEQA Guidelines, given the duration of the construction period (2011 through 2030), the estimated daily project construction emissions are presented in Table V.G.4.

To clarify that students and children are considered sensitive receptors, the following staff-initiated text change has been added as a new first bullet at the bottom of p. V.G.24:

- 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;

#### **Section V.I, Wind and Shadow**

The following staff-initiated text change has been made to the title of Mitigation Measure M-WS-1a, on p. V.I.9:

**Mitigation Measure M-WS-1a: Wind Impact Analysis for Proposed Buildings Over 100 Feet in Height.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-WS-1b, on p. V.I.9:

**Mitigation Measure M-WS-1b: Wind Tunnel Testing for Proposed Buildings Over 50 Feet in Height.**

The following staff-initiated text change has been made to the title of Improvement Measure I-WS-A, on p. V.I.9:

**Improvement Measure I-WS-A: Design Feature Consideration for Proposed Buildings.**

The following staff-initiated text change has been made to the title of Improvement Measure I-WS-B, on p. V.I.9:

**Improvement Measure I-WS-B: Incorporation of Landscaping to Reduce Wind Speeds.**

#### **Section V.J, Recreation**

The following staff-initiated text change has been added in the fifth sentence of the second full paragraph on p. V.J.8:

New athletic playing fields would be provided for sports including, but not limited to, lacrosse, soccer, baseball, and softball, community gardens, an organic farm, an off-leash dog area<sup>20</sup>, and walking and biking paths would be added to serve the residents, neighboring community, and adjacent schools. These facilities would be owned and maintained by the Project Sponsor and would not place any additional burden on the RPD.

## Section V.M, Biological Resources

The following staff-initiated text change has been added in the last sentence of the paragraph at the top of p. V.M.7:

This observation ~~suggests~~ ~~indicates~~ that a pair of red-shouldered hawks displaced the Cooper's hawk pair that nested there in 2008.<sup>10</sup> During the winter, the resident bird community is augmented by species that breed further north or at higher elevations such as ruby crowned kinglet, hermit thrush, yellow-rumped warbler, Townsend's warbler, and fox sparrow. Along with other urban trees throughout San Francisco, the trees on the Project Site also provide stopover habitat for migrant songbirds in the spring and fall. Some of the more regular migrants likely to occasionally occur on site include Pacific-slope flycatcher, warbling vireo, black-throated gray warbler, yellow warbler, western tanager, and black-headed grosbeak.

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-1a, on p. V.M.24:

**Mitigation Measure M-BI-1a: Pre-construction Survey for Gumplant.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-1b, on p. V.M.24:

**Mitigation Measure M-BI-1b: Avoidance During Construction.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-1c, on p. V.M.24:

**Mitigation Measure M-BI-1c: Restoration and Expansion of Gumplant Population That Is Not Avoided in Measure M-BI-1b.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-2a, on p. V.M.25:

**Mitigation Measure M-BI-2a: Pre-construction Survey for Common Yellowthroat Nesting Activities and Buffer Area.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-2b, on p. V.M.25:

**Mitigation Measure M-BI-2b: Monitoring for Western Pond Turtles During Construction.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-2c, on p. V.M.26:

**Mitigation Measure M-BI-2c: SWPPP Design Details for Site Drainage and Water Quality Control in Outfall Construction Area.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-3a, on p. V.M.26:

**Mitigation Measure M-BI-3a: Restrict Vegetation Removal Activities in Wetland and Riparian Areas During Outfall Construction.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-3b, on p. V.M.27:

**Mitigation Measure M-BI-3b: Vegetation Restoration in Outfall Construction Area.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-4, on p. V.M.28:

**Mitigation Measure M-BI-4: Breeding Bird Pre-construction Surveys and Buffer Areas.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-7a, on p. V.M.30:

**Mitigation Measure M-BI-7a: Pre-maintenance Surveys for Active Bird Nests and Buffer Areas.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-7b, on p. V.M.30:

**Mitigation Measure M-BI-7b: Monitoring During Maintenance Activities.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-8a, on p. V.M.31:

**Mitigation Measure M-BI-8a: Pre-permitting Surveys for Birds and Bats.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-8b, on p. V.M.33:

**Mitigation Measure M-BI-8b: Operations Monitoring Program.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-8c, on p. V.M.33:

**Mitigation Measure M-BI-8c: Implementation of Management Strategies.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-8d, on p. V.M.33:

**Mitigation Measure M-BI-8d: Design Elements to Minimize Bird and/or Bat Strikes.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-8e, on p. V.M.34:

**Mitigation Measure M-BI-8e: Incidental Take Permit.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-9, on p. V.M.35:

**Mitigation Measure M-BI-9: Bird-Safe Design Practices.**

The following staff-initiated text change has been made to the title of Mitigation Measure M-BI-10, on p. V.M.35:

**Mitigation Measure M-BI-10: Study of Willow Basin to Control Water Level and Duration of Inundation.**

The following staff-initiated text change has been made to impact statement BI-11, on p. V.M.36:

**Impact BI-11: The Proposed Project would ~~not~~ ~~could~~ result in substantial adverse cumulative effects to biological resources. (Less than Significant)**

**Section V.N, Geology and Soils**

The following staff-initiated text change has been made to the title of Mitigation Measure M-HY-1, on p. V.N.11:

**Mitigation Measure M-HY-1: Best Management Practices for SWPPP.**

The following staff-initiated text change has been made to the title of Improvement Measure I-GE-a, on p. V.N.12:

**Improvement Measure I-GE-a: Use of Soldier-Pile-and-Lagging Shoring System.**

The following staff-initiated text change has been made to the title of Improvement Measure I-GE-b, on p. V.N.12:

**Improvement Measure I-GE-b: Soil Corrosivity Tests.**

**Section V.O, Hydrology and Water Quality**

The following staff-initiated text change has been added to describe the City's proposed municipal groundwater supply project. This new paragraph follows the second full paragraph on p. V.O.3:

The SFPUC is currently reviewing plans to implement the San Francisco Groundwater Supply Project, which would provide an average of four million gallons per day (mgd) of groundwater as part of San Francisco's future municipal water supply. The groundwater would be pumped from the North Westside Groundwater Basin from six potable

groundwater production well facilities, including a facility that would connect to the existing Lake Merced Pump Station, located to the west of the Parkmerced Project Site. These plans are currently undergoing separate environmental review.

A new discussion of the City's Stormwater Design Guidelines has been added after the discussion of "Local Regulations," before the Impacts discussion on p. V.O.8:

**Stormwater Design Guidelines**

The San Francisco Public Utilities Commission and the Port of San Francisco developed Stormwater Design Guidelines in 2009.<sup>14</sup> 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 new footnote has been added to the above new text describing Stormwater Design Guidelines, on p. V.O.8 as follows:

<sup>14</sup> San Francisco Public Utilities Commission, *Stormwater Design Guidelines*, 2009. SFPUC website at [http://sfwater.org/mto\\_main.cfm/MC\\_ID/14/MSD\\_ID/361/MTO\\_ID/543](http://sfwater.org/mto_main.cfm/MC_ID/14/MSD_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.

The following staff-initiated text change has been made to the title of Mitigation Measure M-HY-1, on p. V.O.12:

**Mitigation Measure M-HY-1: Best Management Practices for SWPPP.**

**CHAPTER VII, ALTERNATIVES TO THE PROPOSED PROJECT**

The following text has been added to p. VII.78, before Section H, Environmentally Superior Alternative, to clarify the feasibility of an alternative location:

**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.