



COMMENTS AND RESPONSES ON DEIR

North Beach Public Library and Joe DiMaggio Playground Master Plan Project

PLANNING DEPARTMENT
CASE NO. **2008.0968E**

STATE CLEARINGHOUSE NO. 2009042130



SAN FRANCISCO
PLANNING
DEPARTMENT

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| Draft EIR Publication Date: | August 25, 2010 |
| Draft EIR Public Hearing Date: | October 7, 2010 |
| Draft EIR Public Comment Period: | August 25, 2010 through October 12, 2010 |
| Final EIR Public Certification Date: | April 21, 2011 |



SAN FRANCISCO PLANNING DEPARTMENT

April 7, 2011

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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. 2008.0968E North Beach Public Library and Joe DiMaggio
Playground Master Plan Project**

Attached for your review please find a copy of the Comments and Responses document for the Draft Environmental Impact Report (EIR) for the above-referenced project. **This document, along with the Draft EIR, will be before the Planning Commission for Final EIR certification on April 21, 2011.** Please note that the public review period ended on October 12, 2010.

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, however, may always write to Commission members or to the President of the Commission at 1650 Mission Street and express an opinion on the Comments and Responses document, or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Comments and Responses document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Comments and Responses document or the environmental review process, please contact Michael Jacinto at (415) 575-9033.

Thank you for your interest in this project and your consideration of this matter.

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A. Introduction

Purpose of the Comments and Responses Document

This document contains public comments received on the Draft Environmental Impact Report (Draft EIR, or DEIR) prepared for the proposed North Beach Public Library and Joe DiMaggio Playground Master Plan Project (State Clearinghouse No. 2009042130), and responses to those comments. Also included in this document are text changes initiated by Planning Department staff as well as text changes in response to comments on the Draft EIR.

Environmental Review Process

On August 25, 2010, the San Francisco Planning Department published the Draft EIR on the proposed North Beach Public Library and Joe DiMaggio Playground Master Plan Project for public review and comment. The public review and comment period on the document extended from August 25, 2010, through October 12, 2010. During the 48-day public review period, the San Francisco Planning Department received written comments sent through the mail or by hand-delivery, fax, or email (see Attachment 1). Verbal comments were received at the public hearing on the Draft EIR. A court reporter was present at the public hearing, transcribed the verbal comments verbatim, and prepared a written transcript (see Attachment 2).

This Comments and Responses document has been distributed to the San Francisco Planning Commission, State Clearinghouse, and agencies and individuals who commented on the Draft EIR. This document, in combination with the Draft EIR constitutes the Final EIR for the proposed North Beach Public Library and Joe DiMaggio Playground Master Plan Project. The Final EIR must be certified by the Planning Commission prior to consideration of the proposed project for approval.

Document Organization

Following this introduction, Section B contains a list of all persons and organizations who submitted written comments on the Draft EIR and who testified at the public hearing on the Draft EIR held on October 7, 2010. The original comment letters received on the DEIR and the transcript of the public hearing are reproduced in Attachments 1 and 2, respectively.

Section C contains substantive comments on the Draft EIR made orally during the public hearing and received in writing during the public comment period, from August 25, 2010, through October 12, 2010. Comments are grouped by environmental topic and generally correspond to the table of contents of the Draft EIR. The name of the commenter, the format of the comment (letter, transcript, e-mail, etc.), and the date of the comment are indicated following each comment. Each comment is coded by environmental topic, as indicated below:

| | |
|------------------------------------|----|
| General Comments | G |
| Project Description and Objectives | PD |
| Land Use | LU |
| Recreation | RE |
| Aesthetics | AE |

| | |
|--------------------------------|----|
| Cultural Resources | CP |
| Transportation and Circulation | TR |
| Noise | NO |
| Air Quality | AQ |
| Wind and Shadow | WS |
| Public Services | PS |
| Biological Resources | BI |
| Geology and Soils | GE |
| Alternatives | AL |
| Mitigation Measures | MM |

Section D contains text changes to the Draft EIR made by the EIR preparers subsequent to publication of the Draft EIR to correct or clarify information presented in the Draft EIR, including changes to the Draft EIR text made in response to comments. Section D also contains revised and supplemental Draft EIR figures.

Some of the responses to comments on the Draft EIR provide clarification regarding the Draft EIR; where applicable, changes have been made to the text of the Draft EIR, and are shown in double underline for additions and ~~striketrough~~ for deletions.

Some of the comments do not address environmental issues, but rather express either support for or opposition to the project. Public opinion regarding the merits of the project is not relevant to the adequacy of the EIR, but may be taken into account by decision-makers in their consideration of project approval.

Section 15088.5 of the State CEQA Guidelines requires recirculation of an EIR when “significant new information” is added to the EIR after publication of the Draft EIR but before certification. The Guidelines state that information is “significant” if “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement.” Section 15088.5 further defines “significant new information” that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact less-than-significant level), or identification of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the project that the project sponsor is unwilling to adopt. Additionally, a determination that the Draft EIR was “so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded” would also constitute “significant new information.” Section 15088.5(d) states that recirculation is not required if “new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

As is discussed in subsequent sections of this volume, this Comments and Responses document does not provide “significant new information” as defined in CEQA Guidelines Section 15088.5, and recirculation of the EIR is therefore not required in advance of certification of the Final EIR as complete in accordance with CEQA, pursuant to Guidelines Section 15090.

B. List of Persons Commenting

Written Comments

Commenters are organized first by group, and then alphabetically by last name of the commenter. Original letters, e-mails, and flyers are presented in Attachment 1 in the order shown in this table. Comments are coded in conjunction with the abbreviated CEQA topic area as listed above.

| Person and Title | Agency / Organization | Date | Via |
|---|--|--------------------|------------|
| <i>State, Regional, and Local Agencies</i> | | | |
| Joanne Hayes-White | San Francisco Fire Department | October 8, 2010 | Letter |
| Jul Lyn Parsons, Co-Chair | San Francisco Mayor's Disability Council | October 9, 2010 | E-mail |
| John Paul Scott | Mayor's Office on Disability | October 5, 2010 | E-mail |
| Ed Reiskin | Department of Public Works | October 12, 2010 | Letter |
| <i>Boards and Commissions</i> | | | |
| Charles Chase, President | Historic Preservation Commission | October 25, 2010 | Letter |
| Jewelle Gomez, President | San Francisco Public Library Commission | October 12, 2010 | E-mail |
| Cass Calder Smith | San Francisco Arts Commission | October 6, 2010 | E-mail |
| <i>Organizations</i> | | | |
| Carolyn Blair and Keith Sagers | San Francisco Tree Council | October 4, 2010 | E-mail |
| Susan Brandt-Hawley, Esq., | On behalf of Brandt-Hawley Law Group | October 12, 2010 | E-mail |
| Mike Buhler, Executive Director | San Francisco Architectural Heritage | October 12, 2010 | E-mail |
| Sue Cauthen, Chair | Coalition for a Better North Beach Library and Playground | October 12, 2010 | E-mail |
| Ed Choi, AIA | Choi + Robles Architecture, LLP | October 4, 2010 | E-mail |
| Julie Christensen | Friends of Joe DiMaggio Playground | October 6, 2010 | E-mail |
| Deborah Doyle, President-elect | California Association of Library Trustees and Commissioners | October 7, 2010 | E-mail |
| Craig T. Hartman, FAIA | On behalf of Skidmore, Owings, & Merrill LLP | October 12, 2010 | E-mail |
| Leilani Latimer, Director | Sustainability Initiatives | September 27, 2010 | E-mail |
| Vincent Marsh, Co-Chair | San Francisco Preservation Consortium | October 12, 2010 | E-mail |

| Person and Title | Agency / Organization | Date | Via |
|-------------------------------------|---|--------------------------------------|----------------|
| <i>Organizations (cont.)</i> | | | |
| Brent McDonald | On behalf of Ondarosa Architects | October 5, 2010 | E-mail |
| Zach Phillips, Founder | RollerSoccer International Federation | October 12, 2010 | E-mail |
| Vedica Puri | On behalf of Telegraph Hill Dwellers | October 12, 2010 | Letter |
| Mark Schatz, FAIA | On behalf of Field Paoli Architects | September 24, 2010 | E-mail |
| June Solomon, Executive Director | RollerSoccer International Federation | October 25, 2010 | E-mail |
| Peter Warfield | Library Users Association | October 7, 2010 | E-mail |
| Howard Wong, AIA | Friends of Appleton Wolfard Libraries | October 7, 2010; October 12, 2010 | E-mail |
| Ann Wintroub, Deputy Director | Friends of the San Francisco Public Library | October 12, 2010 | E-mail |
| <i>Individuals</i> | | | |
| Lisa Bowman, Esq. | | October 6, 2010 | E-mail |
| Sal Busalacchi | | October 7, 2010; October 12, 2010 | Letters |
| Joseph Butler, AIA | | October 12, 2010 | Letter |
| Howard Chabner | | October 9, 2010 | E-mail |
| Lily Chow | | October 11, 2010 | E-mail |
| Cathy Cormier | | October 1, 2010 | E-mail |
| Fay Darmawi | | October 7, 2010 | E-mail |
| Elizabeth Diaz | | October 6, 2010 | E-mail |
| Lisa, Evan, and Lailey Elliot | | September 30, 2010 | E-mail |
| Robert Fitch | | August 30, 2010 | E-mail |
| June Fraps | | October 10, 2010 | E-mail |
| Cindy James | | October 7, 2010 | E-mail |
| Lisa Garbus | | October 10, 2010 | E-mail |
| Lee Goodin | | October 7, 2010 October 11, 2010 | Letter; E-mail |
| Lee Goodin and Therese Grenchik | | September 28, 2010 | E-mail |
| Margeret Gwathney | | September 20, 2010 | Letter |
| Amanda Hamilton and Tom Hemmeter | | September 7, 2010 | Letter |
| Charles A. Higuera, FAIA | | October 12, 2010 | E-mail |
| Pia Hinckle | | October 7, 2010 | E-mail |
| Lizzy Hirsch | | October 4, 2010 | E-mail |

| Person and Title | Agency / Organization | Date | Via |
|-----------------------------------|-----------------------|--|----------------|
| <i>Individuals (cont.)</i> | | | |
| Kim, Burt, Max & Grace Hirschfeld | | October 11, 2010 | E-mail |
| Audrey Kelly | | October 5, 2010 | E-mail |
| A.L. Kienker | | October 2, 2010 | E-mail |
| Sarah Kliban | | October 12, 2010 | Letter; E-mail |
| Gyongy Laky / Thomas Layton | | October 10, 2010 | E-mail |
| Linda Lam | | October 11, 2010 | E-mail |
| Brian Lee | | October 4, 2010 | E-mail |
| David Lesseps | | September 28, 2010 | E-mail |
| Lawrence Li | | October 6, 2010 | E-mail |
| Mary Lipian | | October 8, 2010 | E-mail |
| Susan Mackowski | | October 6, 2010 | E-mail |
| Kathleen and David Martin | | October 7, 2010 | E-mail, Letter |
| Ruth Mathison | | October 29, 2010 | E-mail |
| Dr. Karen Melander-Magoon | | August 27, 2010 | E-mail |
| Margaret Monahan | | September 25, 2010; October 4, 2010 | E-mails |
| Charles and Clarice Moody | | September 28, 2010 | Letter, E-mail |
| June Osterberg | | October 12, 2010 | Letter |
| Karin Payson | | October 8, 2010 | Letter |
| Katherine T. Petrin | | October 12, 2010 | E-mail |
| Robert Planthold | | October 12, 2010 | E-mail |
| Eric Robinson, AIA | | September 7, 2010 | E-mail |
| April Sarraile | | August 27, 2010 | E-mail |
| Nancy Shanahan | | October 5, 2010 | E-mail |
| Zack Stewart | | October 2, 2010; October 9, 2010 | Letters |
| Gail Switzer | | September 26, 2010 | E-mail |
| Pat Tura | | September 29, 2010 | E-mail |
| Jennifer Vazquez | | September 27, 2010 | E-mail |
| Carol Verburg | | October 7, 2010 | E-mail |
| Murry Waldman | | September 20, 2010 | E-mail |
| Dale and Susan Weidmer | | October 7, 2010 | E-mail |
| Alison and Dennis Wetherall | | October 6, 2010 | E-mail |
| Joan Wood | | October 1, 2010 | Letter |

Persons Commenting at the Planning Commission Hearing, October 7, 2010

Commenters are listed in the order they spoke at the Planning Commission Hearing. Comments are coded by topic on the transcript of this hearing, which is provided in Attachment 2.

- Luis Herrera, City Librarian, San Francisco Public Library
- Jewelle Gomez, President, San Francisco Public Library Commission
- Dawn Kamalanathan, Planning Capital Manger, San Francisco Recreation and Parks Department
- Alan Martinez, Historic Preservation Commission
- Lisa Bowman
- Fay Darmawi
- Theresa Dal Santo
- Lisa Garbus
- Ginnina Decarl
- Meghan Monahan
- Zack Stewart
- Gerry Crowley, Telegraph Hill Dwellers
- Howard Chabner
- Robert Hinish
- Karin Payson
- Pat Tura
- Bill Bondy
- Tina Moylan
- Scott Lewis
- Rene Bihan
- Dale Weidmer
- Laura Bernabei
- Therese (Terry) Granchik
- Lee Goodman
- Julie Christensen
- June Osterberg
- William Colon
- Sal Busalacchi
- Karen Weiss
- Joseph Butler
- Howard Wong, Friends of Appleton and Wolfard Library
- Sue Cauthen
- Abbey Herget
- Karen Mauney-Brodek, Planner, San Francisco Recreation and Park Department
- Commissioner Antonini
- Commissioner Miguel
- Commissioner Moore
- Commissioner Borden

C. Comments and Responses

General Comments

Comment G-1: Comments that the EIR is adequate, complete, and/or accurate in one or all sections and comments in support of the proposed project.

“I am writing in support of your approval of the North Beach Public Library Draft EIR dated August 2010. The EIR is complete and accurate because it:

- Showed that by building a new library on a parking lot, tearing down the old library, and closing a small portion of Mason Street, we gain over 12,000 square feet of open space. We need more open space in North Beach because it’s the most dense neighborhood in the city with the least amount of open space per capita.
- Found that there were no significant impacts to traffic, public transportation, or emergency vehicle access in North Beach if we remove the parking lot and close a portion of Mason Street for a new library.
- Included so many detailed preservation alternatives that prove that renovating the existing library is an option that will not adequately serve our community. We need a new library because renovating the existing one would result in reduced usable space due to ramps, widened aisles and an elevator for handicapped accessibility.
- Concludes how much better a new library would be for my community rather than renovating the existing one. Our community needs a new library because the new library addresses all of the deficiencies of the existing library. The existing library does not have: (1) enough computers for our school-age kids; (2) an area for middle and high schoolers to study in groups or individually, nor; (3) an accessible community room to be used for programs such as story time for tots, or arts and crafts for families. All these issues will be addressed in a new library that will be almost 60% bigger.
- Stated that although the existing library is a historic resource, there are 6 other libraries that have been preserved throughout the city of exact historical significance. We need a new library in North Beach because the existing one is too small. There are better examples of this type of architecture elsewhere in the city.

“Please adopt the DEIR so our community can have a new library.” (*Kim, Burt, Max & Grace Hirschfeld, E-mail, October 7, 2010; Carolyn Blair & Keith Saggars, E-mail, October 4, 2010; Fay Darmawi, E-mail, October 7, 2010; Pia Hinckle, October 7, 2010*)

“With regard to the above proposal, the EIR is accurate because it shows how much better a new library would be for North Beach rather than renovating the old one. The old one lacks full accessibility, full computer and communication functions, enough space to accommodate community needs, and the ability to keep inventoried the volume of books needed to adequately meet the needs of our neighborhood. In addition, from a leaky roof to heating problems, the existing building has many flaws that render its use unappealing.” (*Susan Mackowski, E-mail, October 6, 2010*)

“I found the Draft of the Environmental Impact Report to be comprehensive in every aspect. My opinions about the possible plans are:

- (a) No [Project] Alternative: This should not be an option as it does not meet any one objective;
- (b) Preservation and Rehabilitation Alternative: Either reduces more interior use space or takes space away from the Joe DiMaggio Playground (as the original library did in 1959);
- (c) Preservation and Southerly Expansion Alternative: Reduces use space of the playground (as mentioned in “b” above), is subject to archeology issues such that the presently unknown could increase costs, as well as uncovering present internal building conditions, e. g., electric, plumbing, sewer, ventilation, dry rot, etc.; and
- (d) Three-story Library Alternative: Meets the most objectives and it may seem expensive, the unknown costs of fixing and adding to an existing building is oftentimes even more costly. In addition, an energy and environmentally efficient building will ultimately be more cost - effective to operate.” *(Lily Chow, E-mail, October 11, 2010)*

“I have been a resident of North Beach for nearly 20 years, and I support the North Beach Public Library and Joe DiMaggio Playground Master Plan Project Environmental Impact Report. The Environmental Impact Report (EIR) is thorough, complete and accurate.

“The North Beach Public Library and Joe DiMaggio Playground Master Plan Project have numerous benefits that outweigh all other considerations. The master plan will benefit the community with much needed open space, and the new, modern library will serve generations to come.

“The planning process has been very long, and the longer the planning process continues, the costs of the project become increasingly expensive, which is wasteful to City taxpayers. Please give North Beach a chance to benefit from improved City services as other neighborhoods have. The excellent EIR is a step in the right direction.” *(Cathy Cormier, E-mail, October 11, 2010)*

“I was involved initially and attended the meetings where the Master Plan was approved, it made a lot of sense to me then. I looked at the EIR, I think it supports what Mr. Herrera and the Parks and Rec came up with as a Master Plan, mainly for the kids and, as the mothers articulated so well here, this is the right thing to do, the EIR supports it, and I urge you to approve it. Thank you very much.” *(Dale Weidmer, Public Hearing Transcript, October 7, 2010)*

“I understand the EIR studied all alternatives for a new and improved Library and nothing in the Report suggests that building a new Library on the Triangle is not appropriate. Nor does the DEIR find anything significantly negative in closing Mason Street. Accordingly we urge that the EIR be accepted as is, so this project can move on.” *(Dale and Susan Weidmer, E-mail, October 7, 2010)*

“I have studied the plans for the library, children’s playground, tennis, bocce ball and the multi-purpose black-top area (i.e. baseball, basketball, Rollersoccer, soccer, etc.). I feel that the entire plan will improve the quality and quantity of safety and healthy activities for kids in the neighborhood through the City.” *(Zack Phillips, E-mail, October 12, 2010)*

“I was impressed by the DEIR, which appeared to me to meet the crucial criteria of being complete, accurate, and sufficient to allow the library renovation plan to proceed.

“The EIR is accurate in that it found no adverse impact on traffic from closing off the block of Mason Street between Lombard & Columbus—a finding confirmed by the success of the Sunday AM farmers’ market that has closed off that same block all summer. The EIR also accurately supports the conclusion drawn from years of public meetings and comment, and from returning over and over to the drawing board, that the renovation plan represents the optimum use of available space and other resources to give North Beach the best possible combination of library, park, sports area, and playground. The EIR is complete in that it recognizes the implications of the plan for diverse constituencies, again endorsing it as the best choice to meet the most needs of local residents.

“The EIR is sufficient in addressing issues such as sunlight and water runoff as well as more obvious impacts, and concluding in every case that the proposed renovation plan will cause no significant negative problems and may improve present conditions, given the scrupulous planning and up-to-date technology that’s gone into it.

“I urge you to accept the positive conclusions of the DEIR and do what you can to move the renovation of our library along as quickly as possible.” (*Carol Verburg, E-Mail, October 7, 2010*)

“So, though some will always quibble and nit-pick, the DEIR for the North Beach branch library is professionally responsive and competently done.” (*Robert Planthold, E-mail, October 12, 2010*)

“Thank you for your thoughtful consideration of this project. This draft EIR is a useful and necessary step to ensuring that the people of San Francisco, and particularly those who live and work in North Beach (sic), have attractive open spaces, secure recreation areas as well as a beautiful and efficient library.

“I write to support the EIR. The staff has done a thorough review of the various aspects and impacts of the project, and has shown great sensitivity to the issues involved in the development of a complex project that is central to a vibrant and historic neighborhood of San Francisco.” (*Deborah Doyle, E-mail, October 12, 2010*)

“Although my email may be too late to effect (sic), your decision, I would like to voice my strong support for approval of the North beach Library EIR and Joe DiMaggio Playground Master Plan.” (*Eric Robinson, AIA, E-mail, October 13, 2010*)

“I have reviewed the Draft Environmental Impact Report, and believe that it is complete and accurate. It reveals that the proposed project will have no significant negative impacts on the neighborhood.” (*June Fraps, E-mail, October 10, 2010*)

“The draft seems thoughtfully prepared, accurate, very thorough and complete. The draft points out several very important facts. For example, the proposed project would result in a LEED Silver building that will reduce overall energy and water demand over the lifetime of the new structure---a very large gain for the community. The Project is consistent with City Planning Code and General Plan and will enhance recreational and library resources for children, the elderly and handicapped persons. From our reading of the proposed design, there will be no *adverse* impact on shadows or shading of the recreational

areas or the neighborhood; nor of *views* and traffic will not be significantly *adversely* impacted.” (*Gyongy Laky and Thomas Layton, E-mail, October 10, 2010*)

“I urge you to approve the EIR and allow the project to begin. The EIR is complete, adequate and accurate.” (*Lisa Garbus, Public Hearing Transcript, October 7, 2010*)

“I have read the EIR. It is accurate and complete. The EIR took two years to prepare. Multiple preservation alternatives were studied thoroughly, and those alternatives did not work. They took up too much of our neighborhood's precious open space, they were not functional, and they were, frankly, disrespectful to members of our community who are disabled or elderly. The possibility of extending the current library to the North was examined extensively, and like the other preservation alternatives, it does not work. It takes up excessive amounts of open space, and it still leaves a four-level library, with most levels and entrances inaccessible to library patrons or employees on crutches, with a cane, or in a wheelchair.

“The EIR accurately shows that the best alternative for all of the diverse members of our community is to build a new library on the triangle, to close the short stretch of Mason Street, and to upgrade the park and playground. This ‘unified’ library and park will give our community a beautiful, functional, and accessible library; and a safer, greener, and larger park. This is what our community needs, and the EIR clearly shows that the master plan is not detrimental to the environment, practically or aesthetically. On the contrary, the master plan will greatly enhance our neighborhood in so many ways.

“I, like many North Beach residents, live with my family in a small apartment with no backyard. In this community we use and treasure our open space. The solution of putting a new library on the parking triangle and having it be the anchor for and open onto a larger, better designed park and playground is a dream come true for this neighborhood. That’s why so many of us participated in the public process that created the master plan. That process was extensive and respectful; it took into account all the members of our community. We have been looking at the model of that plan and dreaming about it coming to life. We have been waiting and waiting, and we are ready to get the project started with your approval of the EIR.” (*Lisa Garbus, E-mail, October 10, 2010*)

“I am writing to support the building of the new library on the triangle at Columbus and Lombard.” (*Linda Lam, E-mail, October 11, 2010*)

“I urge you to approve the Draft EIR. It is accurate, adequate, and complete. ...

“The Draft EIR is complete because the City spent over two years analyzing every impact on this project. It is accurate because it shows that none of the renovation alternatives provide more space or more efficient library services, a better or more integrated park, or better disability access.

“The Secretary of Interior’s Guidelines for Rehabilitation of Historic Properties defines rehabilitation as the process of returning a property to a state of utility through repair or alteration, which makes possible an efficient contemporary use, while preserving those portions and features of the property which are significant to its historic architectural and cultural value. It is simply not possible to renovate the existing library to provide an efficient contemporary use. For one thing, inserting a 9 x 12 elevator shaft on each of the floors would be necessary for disability access, would seriously compromise the openness that is

supposedly an important character defining feature, plus, that does not even address what would be done to make the patio level accessible, you would end up having to alter significantly a lot of the window and door, and so forth.” (*Howard Chabner, Public Hearing Transcript, October 7, 2010*)

“The Draft Environmental Impact Report (DEIR) for the North Beach Public Library and Joe DiMaggio Playground Master Plan Project (Planning Department Case No. 2008.0968E; publication date August 25, 2010) is accurate, complete and adequate. ...

“The DEIR is complete because the Planning Department spent over two years analyzing every aspect and potential impact of the proposed project and of several alternatives. The document includes many drawings, diagrams, simulations, renderings and photos showing the impact of the proposed project and the alternatives. The document reflects the input of many experts, professionals, neighborhood residents, library users, playground users and other San Franciscans as expressed in numerous meetings over several years (including meetings before 2008). It is complete because it considers and relies upon thorough studies of all the major potential impacts. It is complete because it specifies mitigation measures for the impact of the project and the alternatives.

“The DEIR is accurate because it shows that proposed project provides more open space, efficient library services, a better and more integrated park, and better disability access than any of the preservation alternatives. It is accurate because it shows that tearing down the existing building will provide more open space.

“It is accurate because it notes that the San Francisco Public Library has preserved, or is in the process of preserving, six of the eight libraries that Appleton & Wolfard designed. ...

“The DEIR is accurate because it shows that the Preservation and Southerly Expansion Alternative would, among other disadvantages in comparison to the proposed project: 1) be less efficient for library operations; 2) be confusing to navigate for people with cognitive disabilities and blind people; 3) reduce, rather than increase, the amount, quality and contiguity of open space; and 4) reduce, rather than increase, the integration of the library with the playground. ...

“The report is accurate in its conclusion that, except for its impact on cultural resources (i.e. because the existing library is a potentially historically significant building), the impact of the proposed project would be less than significant even without mitigation in every other category save two, and less than significant after mitigation in the remaining two categories.” (*Howard Chabner, E-mail, October 9, 2010*)

“We believe the draft EIR to be thorough and comprehensive and look forward to continue working with the San Francisco Public Library, the Recreation and Park Department, and the Planning Department on this broad plan for the North Beach neighborhood.” (*Ed Reiskin, Letter, October 12, 2010*)

“I find that the EIR is very complete. I think the study was very thorough. I think the transportation study was especially well done and found no problems and no impact. ...

“Something that we haven’t touched much on tonight is a safety issue. I am a medical health provider and I deal a lot with seniors. The way the project would sit with the street being closed, so that the seniors could get across the street, have a place to gather, and do this safety, and with the graying of America, we

are having a lot more seniors, and I see a lot of them in North Beach, so I do hope that you will all consider accepting the EIR and there is always something I leave you with, and that is a message of hope, we can hope, we have all been waiting, even before we lived in San Francisco, my husband and I were involved with it, and it has been at least seven years, so I don't want to bore you with the sad patient story with the issue of hope, but I do hope that you all will consider the EIR." (*Terry Therese Granchik, Public Hearing Transcript, October 7, 2010*)

"For example, the proposed project would result in a LEED Silver building that will reduce overall energy and water demand over the lifetime of the new structure---a very large gain for the community. The Project is consistent with City Planning Code and General Plan. There will be no significant adverse impact on the existing character of North Beach nor will there be any degradation of the recreational resources-to the contrary there will be important enhancement of such resources. There will be no adverse impact on shadows or shading of the recreational areas or the neighborhood; and traffic will not be significantly adversely impacted." (*David Martin, E-mail, October 7, 2010*)

"We, long time residents of North Beach and Russian Hill, have great interest in the proposed North Beach Library Joe DiMaggio Playground Master Plan Project and, accordingly, have actually read the draft EIR summary. The draft seems thoughtfully prepared, accurate, very thorough and complete. The draft points out several very important facts. For example, the proposed project would result in a LEED Silver building that will reduce overall energy and water demand over the lifetime of the new structure---a very large gain for the community. The Project is consistent with City Planning Code and General Plan. There will be no significant adverse impact on the existing character of North Beach nor will there be any degradation of the recreational resources-to the contrary there will be important enhancement of such resources. There will be no adverse impact on shadows or shading of the recreational areas or the neighborhood; and traffic will not be significantly adversely impacted." (*David W. Martin and Kathleen M. Martin, Letter, October 7, 2010*)

"I will state that, as the landscape architect on the Civic Design Review, I think that it is my responsibility to look beyond the buildings and to look at the effect that each project has on its urban edges, its open space, its relationship to the larger urban context, and I think the EIR adequately and accurately addresses those issues." (*Rene Bihan, Public Hearing Transcript, October 7, 2010*)

"The EIR, I did read most of it, I understood it, and it is complete, accurate, and adequate in evaluating the impact of the proposed project. The EIR demonstrates that the community will be much better served by a new library than by renovation of the existing building. It shows that a renovated building will not achieve full parity for the disabled, that space for books and programs would be compromised, and that it would result in a smaller children's playground, and less usable open space. I think it is time to bring that building into the 21st Century. I used to live a block away. The EIR is complete it evaluates multiple options for preservation of the existing building, and it still demonstrates that a new building will better serve the community with universal access, improved library services, and program spaces. ...

"The EIR is accurate because it shows that there are no significant impacts to transportation or traffic with the closing of that section of Mason Street, and a similar diversion at 17th and Castro, which was completed, I think, last year, has had absolutely no adverse impact on local traffic patterns. So, I ask you

to please accept the EIR as it is written in the Draft.” (*Karin Payson, Public Hearing Transcript, October 7, 2010*)

“The EIR shows that a renovated building, because of the original design, will not achieve full parity for the disabled; that space for books and programs would be compromised; and that it will result in a smaller children’s playground and less open space. ...

“The EIR is complete because it evaluates multiple options for preservation of the existing building and still demonstrates that a new building will better serve the community with universal access; improved library services and program spaces and 12,000 square feet in additional open space. ...

“The EIR is adequate because it shows that the new plan for the site will result in 12,000 square feet of new open space. ...

“The EIR is accurate because it shows that there would be no significant impacts to traffic or transportation by closing that small section of Mason Street. Such a minor diversion of today’s traffic pattern will be quickly forgotten as the new park is adopted by the surrounding community. In fact, a similar closure and diversion at 17th and Castro Streets has had no adverse impact on local traffic. (*Karin Payson, Letter, October 8, 2010*)

“I am here to speak on behalf of supporting the EIR, as I believe it is accurate and complete. It does address the issues of the multiple preservation alternatives which were studied thoroughly. There is an exhaustive transportation study. There is included accurate information, that there is no significant impact to aesthetic character of the area’s scenic vistas, shadows, and land use for recreation.

“I approve the DEIR.” (*Margaret Gwathney, Letter, September 20, 2010*)

“We have found the Draft EIR to be thorough and to have covered every possible issue that could influence the construction of the new North Beach Library. We support the Draft EIR and urge you to adopt it thereby permitting this much needed library to move forward to construction and to serving the North Beach neighborhood.

“We support the Draft EIR and urge you to adopt it thereby permitting this much needed library to move forward to construction and to serving the North Beach neighborhood.” (*Charles and Clarice Moody, Letter, September 28, 2010*)

“While we are aware of the arguments against these changes, we feel the newer plans are very well considered and that their implementation will serve the N. Beach community better and for a longer time.” (*Amanda Hamilton and Tim Hemmeter, Letter, September 7, 2010*)

“My wife and I have lived at 300 Chestnut Street for over 20 years. We are in favor of building a new library.” (*Murry Waldman, E-mail, October 13, 2010*)

“I’m here speaking in support of your approval of the North Beach Library Draft EIR. I believe the EIR is complete and accurate. It shows that, by building a new library on a parking lot, tearing down the old library, and closing a small portion of Mason Street, we gain over 12,000 square feet of open space. We

need more open space in North Beach because it is the densest neighborhood in the City with the least amount of open space per capita. ...

“In addition, the Draft EIR, one of my concerns was about traffic, and there were no significant impacts on traffic when they close the street. I was there, I saw, it didn’t change anything, and it didn’t impact public transportation or emergency vehicles. ...

“The Draft EIR is complete and accurate as presented, let’s finalize the Draft EIR as presented so we can move forward with a bigger library and more space for all the neighborhood residents.” (*Theresa Dal Santo, Public Hearing Transcript, October 7, 2010*)

“It took two years to prepare, many many preservation alternatives were considered and studied extensively, and they didn’t work. They took up too much of our precious open space, they were not functional, the preservation alternatives, they were frankly disrespectful to the people in our community who have disabilities, who are elderly, those alternatives did not work. The EIR shows good, complete, accurate information that the best alternative is a new library on the triangle. It showed accurate, complete information that an expanded park is good for our community. We in the community want a new library because we love the library and we want to be able to use it. We in the community want a new, bigger, safer park because, as everybody has said, open space in our neighborhood is rare.” (*Lisa Garbus, Public Hearing Transcript, October 7, 2010*)

“Because this is a complicated project that requires planning to enhance services from two City departments, it was important to deliberately and carefully examine the potential impacts that the project has on land use and recreation, cultural resources, transportation, and the aesthetic character of the project area, including shadowing of the proposed building options.

“From my standpoint, the Environmental Impact Report does exactly that, and provides a very thorough and accurate assessment of the Master Plan and the multiple alternatives for the North Beach Branch Library. Ultimately, this document shows that the only way to provide this very dense urban neighborhood with the library service it deserves in an accessible and safe building is by replacing and updating an inefficient branch library with a new building. The design of the new branch library is bound to have no significant impacts on the character of the neighborhood, or the scenic vista and, in fact, provides a more unified, safer, and greener connection between the library and the Joe DiMaggio Playground, which will enhance the entire neighborhood. Finally, the Environmental Impact Report is adequate, accurate, and complete. Thank you.” (*Luis Herrera, Public Hearing Transcript, October 7, 2010*)

“The Draft EIR, the Recreation and Park Department feels, provides an excellent analysis of the proposed Master Plan for the Joe DiMaggio Playground and its various alternatives. The EIR carefully evaluate[s] the numerous impacts, including potential historic resources, open space and recreational resources, traffic impacts, as well as on views and aesthetics, it is a thorough and complete document. ...

“And I am really here tonight, I think, to make that particularly point, around the policy context for environmental review, as we think about its consistency with our overall General Plan and the ROSE process that I have been very personally involved with working with City Planning staff over the past year, and if there is one clear – one of the main clear messages – that has emerged through that ROSE,

through the updating of the ROSE, has been this focus on adding open space in highly dense neighborhoods, and that we need to think about that criteria and that impact as we evaluate the EIR and the preferred alternatives.” (*Dawn Kamalanathan, Public Hearing Transcript, October 7, 2010*)

“The Cultural Resources section of the Draft EIR and the Historic Resources Technical Report tell the story of that land. Mexico Settler Juana Briones, a resident Herbalist and Healer, lived on the land in the late 1830’s. Following her in the 1850’s, the Sisters of the Presentation, an Irish Women’s Teaching Order, established a school for African-American and Native-American girls. Following the 1906 Earthquake, a children’s playground was built on the rubble of the convent, all of these things are referenced in the report; all of this is sacred ground.

“A document that is not included in the EIR is a report, which I can leave with the Commission, from the Recreation and Park Department, a letter to Mayor George Christopher dated July 26th, 1956. In it, it describes the Library Commission’s request to build a new library. That report states in 1956, “The Library and Recreation and Parks Commissions specifically recommend ‘that the North Beach Library be located on the triangle parcel of property located between Lombard Street, Columbus Avenue, and Mason Street, and that Mason Street be closed between Lombard and Columbus,’” the exact same plan that we are considering today.

“You and I, as City appointed Commissioners, have a chance to correct a 50-year mistake. The EIR under consideration is accurate and more than adequate as it clearly shows that the plan to build a new North Beach Library on the triangle parking lot and expand the Joe DiMaggio Playground is the correct course of action. Please join your fellow Commissioners and approve the North Beach EIR so we can use this ground wisely for our children for the future.” (*Jewelle Gomez, President, San Francisco Library Commission, Public Hearing Transcript, October 7, 2010*)

“On behalf of the San Francisco Public library Commission, I am writing in support of the Draft Environmental Impact Report for the North Beach Public Library and Joe DiMaggio Playground Master Plan Project.” (*Jewelle Gomez, President, San Francisco Library Commission, E-mail, October 12, 2010*)

“The 386-page draft EIR seems to me to be thorough, complete and accurate. The only arguably significant impact of the library is the demolition of the older, ‘historical’ structure; yet the benefits of a new library and park complex far outweigh the loss of this building.” (*Lisa Bowman, E-mail, October 6, 2010*)

“So, I just wanted to say I’ve looked at the EIR, I actually have, all 386 pages or whatever it is, I’m not an expert in that area, but to me it seemed to, I guess, address a lot of the issues, and I think any benefits of getting a new library and park would far outweigh any of the destruction of the current existing building.” (*Lisa Bowman, Public Hearing Transcript, October 7, 2010*)

“I am also an Architect and have been before this Commission many times for conditional use permits and preservation issues over the 25 years I have been practicing architecture here, and feel that the examination of the alternatives in the EIR was very thorough, extremely detailed. And, without making comment on the pluses and minuses, I find that if you look at the plans, that it is very easy to tell and make a decision about what the positives and negatives are. I, myself, have concluded that the proposed

project is the best alternative, and I feel it is the best thing that has come to our neighborhood since I've lived there.” (*Bill Bondy, Public Hearing Transcript, October 7, 2010*)

“The community and dedicated professionals have worked for seven years on a Master Plan for a new library and park. The Draft EIR is a thorough and objective assessment of the options. Based on this comprehensive analysis, it's clear that the best option for the neighborhood is a new library on the Mason Street triangle, and an expanded and upgraded Joe DiMaggio Park.” (*Scott Lewis, Public Hearing Transcript, October 7, 2010*)

“And I actually wanted to add that the findings about the closure on Mason Street seem to be consistent with what we found in closing other streets with the parks, the pavement program, it just shows, I mean, that is the direction that we are moving into, and the data from here is very consistent data that we found in other instances where we've closed streets. So it actually further validates the accuracy of this information for me.” (*Commissioner Borden, Public Hearing Transcript, October 7, 2010*)

“One of the things I really am pleased about the EIR is it does study the potential historic impacts, open space, and recreational resources, traffic impacts, views, and aesthetics. The site is a very complicated project, but I am very pleased with the EIR, which took a long time to put together; the Planning Department did a very good and thorough job, in my opinion. ...

“And I just wanted to mention, one of the things that people are referring to is that there was a two-month – six weeks or two months, I actually can't remember off the top of my head – closure of Mason Street. I don't know if a few of you had a chance to witness that, but it was a really interesting project, a lot of the community came and worked to build that together, and that was, I think, one of the best ways to really study the impacts, and I think it allowed us to really do that in a thorough way in the Environmental Impact Report. ...

“So, again, I encourage you to support the EIR, to find it complete and accurate. I believe it has been extensively studied, many many of the aspects of this project.” (*Karen Mauney-Brodek, Public Hearing Transcript, October 7, 2010*)

“I am here to support the approval of the Environmental Impact Report for the North Beach Library. It is accurate and complete. It shows that many preservation plans for a new library were considered, but that each one of them kept the library that is currently four levels, which would enforce an inefficient use of space in the library and a loss of open space outside of the library due to ramps and an elevator. Also, there are six other Appleton and Wolford libraries in San Francisco which are more historical in architectural value. The EIR shows that over 12,000 square feet of additional open space added by building the new library on the triangle, and closing one block of Mason Street, is sorely needed in our very densely populated neighborhood. Through an extensive transportation study on the closure of Mason Street, the EIR shows that there were no adverse effects on the flow of traffic in the neighborhood. I live two blocks away and my husband works at home full time and we are on busy Powell Street, and we notice no differences.” (*Ginnina Decarl, Public Hearing Transcript, October 7, 2010*)

“Hi, my name is Fay Darmawi and these are my two sons, and we use the North Beach Library a lot, and we think that the EIR is accurate and complete, I actually read it, I actually have a Masters in City

Planning, so I actually understood it. But we want to move ahead with the new library.” (*Fay Darmawi, Public Hearing Transcript, October 7, 2010*)

“The North Beach Public Library and Joe DiMaggio Playground Master Plan Project Environmental Impact Report. The EIR is thorough, complete and accurate. The project has numerous benefits to our neighborhood that outweigh all other considerations.” (*Megan Monahan, E-mail, September 25, 2010*)

“The CNL [Council of Neighborhood Libraries] visited the North Beach Branch Library and reviewed the draft Environment Impact Report (EIR) which included the studies done on the building. As you know, this is a very complete two year study that included looking at transportation, shadow, aesthetics, views, preservation, and other impacts of building a new library and expanding the park.

“As the draft EIR points out, the existing library is inadequate and inefficient to serve the needs of the North Beach community. North Beach families deserve a state of the art facility with separate spaces for children, teens, and adults; more computers; access for all; improved librarian supervision; children’s early learning features; and space for library and community programs. They also deserve a library and park that is safe, inviting, and makes the best use of our limited civic resources.

“We have celebrated the completion of over half of the branch library projects and urge you to move this EIR forward, so that the North Beach community can get a new library equal to what all of our communities are already enjoying.” (*Meghan Monahan, North Beach Branch Representative to the Council of Neighborhood Libraries, E-mail, October 4, 2010*)

“The EIR is adequate and complete, and we would like to get on with this process and get a new library.” (*Meghan Monahan, Public Hearing Transcript, October 7, 2010*)

“Please adopt the DEIR so our community can have a new library it so deserves after waiting for over 50 years for one that is of adequate size and capacity to serve our densely populated North Beach community.” (*Carolyn Blair & Keith Sagers, E-mail, October 4, 2010; Fay Darmawi, E-mail, October 7, 2010; Pia Hinckle, October 7, 2010*)

“I have reviewed the Environmental Impact Report for the proposed project, and find it to be a thorough and complete document. I looked particularly at the sections related to historical resources and traffic. Despite the findings that the existing building might be of historical importance, I feel that it is inadequate as a public library for a number of reasons. It is too small, it is on multiple levels, it has inadequate space for staff, and it is deficient in its capacity to incorporate the currently desired technological components of library service. ...

“I studied the proposed alternative approaches to the design of the library, and feel strongly that the preferred approach, placing a new library on the triangular piece of land opposite the existing library across Mason Street, is the best one. All of the options that expand the library on the current site result in substantial reductions in the amount of open space and playground area on that site. As a regular user of that playground, I know how popular it is with young families, and I feel this approach would truly be detrimental to the neighborhood.

“I view the proposed design as a real win/win solution for the North Beach community. It will bring in a brand new library, designed by Marcia Maytum, whom I consider to be one of the best practitioners in our field in the Bay Area. Having designed more than 20 libraries myself in the past 15 years, I can state that I honestly believe that the proposed design will be a wonderful, functional, creative, and efficient new library, sized to serve the neighborhood for years into the future. The scale of the new project is appropriate for the site along Columbus Avenue, and it has the potential to become a real beacon for the neighborhood, with a strong civic presence and views in to the library activities from the park and the street.

“In addition, in phase 2, the playground will be greatly expanded, and better integrated into the overall park setting. This is an equally exciting prospect, and the proposed design is playful, dynamic, and well thought out.

“Therefore, I urge the planning commission to approve this EIR, so that the Library can move forward with the documents and construction of this exciting new addition to the North Beach community.” (*Mark Schatz, FAIA, LEED-AP, E-mail, September 2, 4, 2010*)

“I urge you to support the adoption of the current EIR without any further expense to the city by allowing a small specific group of people who want to drag this process out for their own benefit instead of adding value to the community. I appreciate your support” (*Pat Tura, E-mail, September 29, 2010*)

“At this time, I think because the EIR was so much work that went in to get to the EIR, that it is time to move on and to grant this community what the majority of the community has wanted for the last seven years.” (*Pat Tura, Public Hearing Transcript, October 7, 2010*)

“I represent Russian Hill Neighbors, and we recently, Monday night, for the second time, put it up to a vote about the EIR and unanimously – which is rare for our group – accepted the EIR as adequate, accurate, and very efficient, and came to the general consensus that reading is the key to knowledge, knowledge is the key to success, and let’s get on with it. Our group urges you to accept and adopt the EIR as it is presented.” (*Tina Moylan, Public Hearing Transcript, October 7, 2010*)

“I’m writing to express my support for the proposed new North Beach Library and Park project. After review of proposed documents and plans, I found the new project to be a huge improvement over the existing facilities we have. Our neighborhood is greatly in need of this project and the benefits it provides.

“I do not believe the closing of the Mason Street would negatively impact the traffic in this area. Based on my driving experiences over the years, I’ve always found the streets somewhat confusing where Mason intersects Columbus Ave. The existing triangular site where the proposed library would be is an island parking lot. It would be better served with a first rate library building that anchors the block and be a beacon to the neighborhood.

“I urge you to adopt the EIR, decline the landmark status on the existing library and approve the proposed new library and park. We need this long overdue replacement new library and expanded park for our neighborhood! Thank you for your attention and consideration.” (*Ed Choi, AIA, E-mail, October 4, 2010*)

“I believe that the EIR is accurate, adequate, and complete, and I ask that you approve the EIR.” (*Rene Bihan, Public Hearing Transcript, October 7, 2010*)

“We sent a letter to the Planning Department and I am just going to read two paragraphs from that letter: ‘CNL visited the North Beach Branch Library and reviewed the Draft Environmental Impact Report, the EIR, which included the studies done on the building. As you know, this is a very complete two-year study. It included looking at transportation, shadow, aesthetics, views, preservation, and other impacts, of building a new library and expanding the park.’” (*Laura Bernabei, Public Hearing Transcript, October 7, 2010*)

“I am writing regarding the North Beach Public Library and Joe DiMaggio Playground Master Plan Project Environmental Impact Report. I have read much of the report and feel that it is thorough, complete and accurate.

“I support its findings and request that you approve it.

“The new library proposal has numerous benefits to our neighborhood that outweigh all other considerations. This has been a long and tedious planning process and it is now time to move forward. We need a larger library and the current plan is the most efficient and realistic plan to achieve this goal.” (*Gail Switzer, E-mail, September 26, 2010*)

“I am writing to you in regards to the pending review of the Draft Environmental Impact Report. As a member of the North Beach Community I can vouch for the public process that has helped shape the EIR under current consideration. Although there are a few connected individuals who are attempting to hi-jack a process that has produced a thorough and complete EIR, I urge you ignore these people and listen to the majority voice of the North Beach Neighborhood. As a grass roots neighborhood effort we crafted and thoroughly reviewed multiple options. The closure of Mason Street has been happening on a regular Sunday Basis without detriment to the neighborhood. Alternate designs were considered that configured the Library many different ways, including looking at reusing the poorly crafted ode to the suburban ranch house. As a neighborhood we have come to consensus on a design that produces the greatest benefit to the neighborhood. Yet some individuals are trying any and all angles to kill the project. Just because an argument can be made, does not mean that it should be made.” (*Brent McDonald, E-mail, October 5, 2010*)

“I am writing in regards to the North Beach Public Library and Joe DiMaggio Playground Master Plan Project Environmental Impact Report. The EIR is thorough, complete and accurate. The project has numerous benefits to our neighborhood that outweigh all other considerations. This has been a long and tedious planning process.

“We want a chance for the same City services as other parts of the City.

“Among other things, the draft EIR included so many detailed preservation alternatives that show that renovating the existing library will not adequately serve the community. We need a new library because renovating the existing one would result in reduced usable space due to ramps, widened aisles and an elevator for handicapped accessibility.

“Please adopt the DEIR so our community can have a new library since we have been waiting for over 50 years for one that is of adequate size and capacity for North Beach.” (*Audrey Kelly, E-mail, October 5, 2010*)

“First, thanks for the hard work that goes into preparing such a study. The facts and figures speak for themselves. I might reiterate is that the argument that following the approved master plan the Lombard triangle would not be used exclusively as an ‘open space’ entity is to me an irrelevant if moot point, since the entire plan allows for more open space than would be possible if the library were to remain in the Joe D park, where I understand its original construction was counter to city regulations governing public park space even at the time. The master plan allows for the park space to be ultimately restored as public park space, considering the very helpful presence of the old library to serve the neighborhood during construction of the new.” (*Dr. Karen Melander-Magoon, E-mail, August 27, 2010*)

“My husband and I have been North Beach residents since 1990 and have two sons who attend Yick Wo Elementary School. We are writing in support of your approval of the North Beach Public Library Draft EIR dated August 2010.

“The EIR is complete and accurate because it concludes how much better a new library would be for my community rather than renovating the existing one. Our community needs a new library because the new library addresses all of the deficiencies of the existing library. The existing library does not have: (1) enough computers for our school-age kids. (2) an area for middle and high schoolers to study in groups or individually, nor; (3) an accessible community room to be used for programs such as story time for tots, or arts and crafts for families. All these issues will be addressed in a new library that will be almost 60% bigger. It stated that although the existing library is a historic resource, there are 6 other Appleton Wolford libraries that will remain as part of the historical. San Francisco urban fabric .We need a new library in North Beach because the existing one is too small and no history will be lost as there are better examples of this type of architecture in the city.

“Please adopt the DEIR so our community can have a new library. In 2001 I attended a meeting at North Beach library regarding plans for its renovation and I cannot believe that nine years later nothing has changed and we still have an inadequate, poorly equipped library; our children and the residents of North Beach deserve better.” (*Alison Wetherall, Letter, October 6, 2010*)

“I have studied the plans for the library, children’s playground, tennis, bocce ball and the multi-purpose black-top area (i.e. baseball, basketball, RollerSoccer, soccer, etc). I feel that the entire plan will improve the quality and quantity of safe and healthy activities for kids in the neighborhood throughout the City.” (*June Solomon MA, Sport Management, Kick N Roll, E-mail, October 12, 2010*)

“I too support and urgently request your approval for the new North Beach Public Library Draft EIR dated August 2010 for all the reasons listed below. I have been resident of North Beach for over 20 years and am raising my family of 5 here. The current library does not support the needs of our community and I believe the plan for the new library will finally be a step in the right direction to meet the current and future needs of North Beach residents and families.” (*Cindy James, E-mail, October 7, 2010*)

“We, long time residents of North Beach and Russian Hill, have great interest in the proposed North Beach Library Joe DiMaggio Playground Master Plan Project and, accordingly, have actually read the draft EIR summary. The draft seems thoughtfully prepared, accurate, very thorough and complete. The draft points out several very important facts.

“I would like to take a moment to give my support for the recent changes proposed for North Beach Library, around the North Beach Pool.

“I am a 20 year resident of North Beach, a parent of 2 children, a member of the Friends of Joe DiMaggio and a user of both park and Library. I have read the DEIR for the North Beach Library and Joe DiMaggio Master Plan and urge you to approve the document for the following reasons.

1. It covers and weighs in all the critical issues including but not limited to:
 - a. inconsequential view corridor impacts
 - b. zero impact on traffic patterns
 - c. a net decrease in sun/shade impacts on the playground
 - d. provided (2) two preservation expansion alternatives to the South and North that demonstrate a negative impact on open space and library services.
2. It stated that although the existing library is a historic resource, there are six other Appleton Wolford libraries that will remain as part of the historical San Francisco urban fabric. We need a new library in North Beach because the existing one is too small, impacts the playground and no history will be lost as there are better examples of this type of architecture in the city.
3. The new library proposal has numerous benefits to our neighborhood that outweigh all other considerations. This has been a long and tedious planning process and it is now time to move forward. We need a larger library and the current plan is the most efficient and realistic plan to achieve this goal as well as gain 12,000 sf of open space!” (*Lizzy Hirsch, E-mail, October 4, 2010*)

“I cherish my community, I cherish my children, I skipped putting them to bed tonight to come here and ask for your support of the Draft EIR. It is time to move forward with this effort. The EIR is adequate, accurate, and most importantly, I believe it is complete. Again, it is time to move forward with this project. The EIR addresses all of the required aspects and the potential impacts of this project. It considers all preservation alternatives, provides significant analysis to support the need for a new library, a significant analysis that supports the closing of Mason Street, and it provides multiple analyses of the conflicting General Plan policies, an analysis yielding that there is no aesthetic impact to this project. Please allow us to make progress. Please support our families and our children in San Francisco. Please support the approval of this Draft EIR. Our neighborhood is desperate for this. Our children deserve this. And our community is almost in unanimous support of this.” (*William Colon, Public Hearing Transcript, October 7, 2010*)

“The Friends of Joe DiMaggio Playground thank the Planning Department for their extensive, comprehensive, balanced and lengthy efforts in crafting the Environmental Impact Report for the North Beach Library and Joe DiMaggio Playground master plan project. We respectfully urge the Planning Commission to acknowledge your department’s exceptional efforts on this document by approving and adopting its findings.

“We understand that this is a complex and challenging project. We appreciate the need for caution and for adequate and fair analysis. But the time has come to review the information—gathered over years—and make some decisions about the fate of our neighborhood.

“We have been studying options for the Joe DiMaggio Playground actively since 2000. The Library began its official explorations into possible library expansion in 2003. The joint library and playground master planning project began in early 2008. Community meetings and public hearings on the master plan have stretched over 30 months. The EIR was expected to take 9 months, then 12, then 18. We are currently on year 2. The kids whose needs triggered our organization in the 1990s are in high school and college now, a few are even married with kids of their own. In the worsened economic climate our families, teens and adults need the library and park more than ever. It’s time to make some choices so we can all move on.”

“The only thing missing from the EIR, in my perspective, is a sense of urgency.” (*Julie Christensen, Steering Committee, Friends of Joe DiMaggio Playground, E-mail, October 6, 2010*)

“I am writing on behalf of the Arts Commission’s Civic Design Review Committee. The Committee unanimously approved Phase 2 of the design for the new North Beach Branch Library on November 16, 2009, with final approval pending the certification of the EIR. The Committee supports the Environmental Impact Report (EIR) as adequate, accurate and complete, and we encourage approval of this document by the Planning Commission.

“We support the master plan for this project based on the evidence laid forth in the EIR, which demonstrates that by building a new facility on the existing parking lot, removing the current structure, and closing the end of Mason Street, the neighborhood will gain much needed open space. This addition of 12,000 square feet of public space will greatly enhance the functionality and civic importance of the library and playground in a neighborhood that has little room for expansion and yet a high population of children and families. This and the crucial public benefits of an updated, functional, and enlarged public library should be overriding considerations to the removal of a potential historic resource. Additionally, we believe that because the EIR states that there are no significant impacts to transportation or recreation resources, that there is no reason this project should not move forward. The Committee believes that the new building’s design is appropriate for the neighborhood, conceptually strong, refined, and exemplary of our current values surrounding sustainability. Its contemporary design will stand as a beacon for the future.

“We believe that civic buildings should convey a sense of openness to the public as a gesture that they are welcome. The new North Beach Branch Library does this with its public space, natural light and transparency. These are attributes that the existing North Beach Library building does not possess nor convey.

“We strongly encourage the Planning Department to approve this document based on the clear findings in the EIR.” (*Cass Calder Smith, Civic Design Review Committee, San Francisco Arts Commission, E-mail, October 6, 2010*)

“I’ve watched the street closing, I’ve studied the plans, and I also can honestly say I read the EIR online. So, I feel that this EIR well documents our neighborhoods urgent need for more park space and a new

library. The EIR also documents that this elegant and efficient solution was developed with enthusiastic seven-year long community involvement. Please support the EIR and make our involvement worthwhile and meaningful.” (*Abbey Herget, Public Hearing Transcript, October 7, 2010*)

“I also, too, wanted to say that I thought the EIR is adequate and accurate.” (*Commissioner Borden, Public Hearing Transcript, October 7, 2010*)

“Talking about the EIR, I found the EIR interesting and quite thorough.” (*Commissioner Moore, Public Hearing Transcript, October 7, 2010*)

“We are writing in support of your approval of the North Beach Public Library Draft EIR dated August 2010. As long-time North Beach residents we have been eagerly awaiting a new and improved facility.

“We believe the EIR is thorough, complete and accurate. The new library and enlarged park have numerous benefits to our neighborhood that outweigh all other considerations. We want and deserve a chance for the same city services as other neighborhoods of the City.

“Please adopt the EIR so our community can have a new library. We have been waiting for over 50 years for one that is of adequate size and capacity for North Beach.” (*Lisa, Evan, and Lailey Elliot, E-mail, September 30, 2010*)

“I am writing on behalf of your support and approval of the recently published EIR dated August 2010 regarding the North Beach public library. I was a part of the collaborative master planning process, multiple community meetings, library commission meeting and numerous redundant Historical preservation hearing. The North Beach community needs a new library of adequate size and capacity to meet the needs of the citizens. I believe the EIR is thorough, complete and accurate for the following reasons:

“The community will benefit from enough computers for our school aged kids, individual areas for older kids and a community room to use for story time or poetry readings. The city stands to gain 12,000 sq. ft. of new open space which is not easily attained in an urban setting. This is the densest neighborhood in the city and this combination of a civic presence in the form of a library with the open space will make a strong statement of the city’s commitment to a holistic education and life style of its people.

“The EIR has found no significant impacts to traffic, public transportation, or emergency vehicles access in North Beach if we remove the parking lot and close a portion of Mason Street for the new library. The community already has a program that closes parts of Mason St. for special events as well as a weekly farmers market. It’s an urban lifestyle in 2010 that deserves a library to share learning, culture and living that makes a great community.

“When the EIR is adopted, this will allow for the community to move forward and embrace the future without burdening the city with unwarranted cost of trying to retro fit a substandard Appleton Wolford design that will steal very much needed recreational area from the existing playground area. The voters pass the library bond measure for this purpose and by the way, there are 6 Appleton Wolford libraries in the city that are a better representation of the modernist style and they will remain as part of the historical SF landscape.

“I am writing in support of your approval of the North Beach Public Library Draft EIR dated August 2010. Our community needs a makeover of its current library to address all the deficiencies of the existing library. The mezzanine level of the existing library does not provide wheel-chair access or makes itself accessible to tots and families during story time. The basement level where the restrooms are located is also inaccessible to users on wheels.

“Please adopt the DEIR so our community can have a library we can all appreciate for years to come.”
(*Ruth Mathison, E-mail, September 29, 2010*)

“I am writing in support of your approval of the North Beach Public Library Draft EIR dated August 2010. I am a resident of North Beach, a parent, and a frequent patron of the North Beach Public Library.

“It is my understanding that the EIR demonstrated that merely renovating the existing library will not adequately serve the community, and will limit accessibility and usability. North Beach needs a new library because renovating the existing one would result in reduced usable space due to ramps, widened aisles and an elevator for handicapped accessibility.

“Please adopt the DEIR so our community can have a new library. North Beach has been waiting for over 50 years for one that is of adequate size and capacity for North Beach.” (*David Lesseps, E-mail, September 28, 2010*)

“We are writing in support of the North Beach Public Library Draft EIR dated August 2010. The Draft EIR:

- Shows that by building a new library on a parking lot, tearing down the old library, and closing a half-block section of Mason Street, over 12,000 square feet of open space will be gained. More open space is critical in North Beach because it is the densest neighborhood in the city with the least amount of open space per capita.
- Finds that there were no significant impacts to traffic, public transportation, or emergency vehicle access in North Beach if we remove the parking lot and close a portion of Mason Street for a new library.

“The EIR is thorough, complete and accurate.” (*Lee Goodin, E-mail, September 28, 2010*)

“This Draft EIR for the library and playground project is one of the most complete and accurate I have seen. It provides complete information to support a new library and an exhaustive transportation study that full supports the Mason Street closure.” (*Lee Goodin, Public Hearing Transcript, October 7, 2010; Letter, October 7, 2010*)

“Kind Sirs, I am writing to express my support for the above project. Now that the Environmental Impact report is complete, something I read through with great interest, I feel confident that our neighborhood should move forward with the new library and park.” (*Leilani Latimer, E-mail, September 27, 2010*)

“I am writing to you to support approval of the North Beach Public Library Draft EIR dated August 2010. I am part of the North Beach community and live a half-block from the current library. My two children and I are regular library-users and we hope to continue doing so in a new, useful, patron friendly and

staff-appreciated Library in the coming months. After reviewing the EIR, I feel that it is complete and accurate because for the following reasons, among many others:

- It concludes how much better a new library would be for my community rather than renovating the existing one. I am against renovating the old one. Our entire community needs a new library.
- It explains how the new library addresses all of the deficiencies of the existing library. The existing library does not have 1) enough computers for our school-age kids, 2) an area for middle and high schoolers to study in groups or individually, and 3) an accessible community room to be used for programs such as story time for tots or arts and crafts for families. All these issues will be addressed in a new library that will be almost 60% bigger.
...

“Please adopt the DEIR so our community can have a new library since we have been waiting too long for one that is of adequate size and capacity for North Beach.” (*Jennifer Vazquez, E-mail, September 27, 2010*)

“As a North Beach Resident I urge you to push forward on the plans to build the library on the Mason Street triangle, and re-organize the playground and open space.” (*April Sarraile, E-mail, August 27, 2010*)

“Friends of the San Francisco Public Library considers the Draft Environmental Impact Report (DEIR) for the expanded Joe DiMaggio Playground and new North Beach Library to be adequate, accurate and complete for the following reasons:

- The EIR found that there were no significant impacts to traffic or transportation in North Beach if we *remove* a parking lot and close a portion of a street for a new library.
- The EIR lists all the schools and childcare facilities in the neighborhood that depend on the library and park for education and recreation.
- The EIR shows that by building a new library on a parking lot, tearing down the old library, and closing a small portion of the street, North Beach gains *over* 12,000 square feet of open space.
- The EIR shows so many photo-simulations, massing diagrams and shadow drawings so that you can see clearly how the new library will look when it’s built.
- The EIR shows that none of the building preservation alternatives *provide* more open space, efficient library *services*, and unify the Park as much as building a new library on the triangle.
- The EIR includes so many detailed preservation alternatives that show that *renovating* the existing library will not adequately *provide* ADA parity, as the same problems that exist now will continue.
- The EIR public process is thorough and comprehensive.

“Thank you for such a thorough and complete report!” (*Anne Wintroub, Deputy Director, Friends of the San Francisco Public Library, E-mail, October 12, 2010*)

“Please allow the SFPL and SF RecPark Departments to proceed with the master plan which they have worked so hard for and have received so much support from the community. ... Implore you to support and endorse the Master plan and the DEIR.” (*Elizabeth Diaz, E-mail, October 6, 2010*)

“In May 2009 I was asked by the San Francisco Library Commission to provide an architectural peer review of the proposed design for the new North Beach Branch Library, designed by Marsha Maytum of Leddy, Maytum, Stacy Architects. At that time I found the proposed design to be an exceptional project which will at last bring an architecturally distinguished and neighborhood friendly library to North Beach. I was recently asked to review the Environmental Impact Report for this project and found that not only was it well executed and completely accurate, but that the report made it even more abundantly clear that a new library and expanded park are greatly needed in North Beach.

“The new design will be light filled and will possess a rare generosity of civic spirit in its openness to the neighborhood. Importantly, the new library design brings with it the opportunity to create a delightful new neighborhood park and to bring a new pedestrian-friendly cohesiveness to this part of North Beach by correcting a confused existing street alignment. In reviewing the new library design and the overall site master plan, I became reacquainted with the existing library which I first came to know when our children used it 16 years ago. Virtually every civic quality the proposed new library design and its long-term master plan possess is lacking in the existing.

“When I first encountered the existing library I remember thinking how the warmth of the books and the library staff stood in contrast to the building’s introverted, cramped and dark interior. The stepped, partial level changes between the entrance and the major interior spaces provide one of the few interesting architectural qualities but also further break up the an already small interior and render it inaccessible to those in wheelchairs. The lack of architectural generosity found on the inside continues to the exterior where the library meets the neighborhood with unfriendly blank walls, a confusing single entry and undistinguished architectural details and massing.

“I am confident that a new North Beach Library and expanded Joe DiMaggio Playground will better the North Beach community significantly, and I urge you to take into account the positive findings of the Environmental Impact Report and support the community’s desire to improve their neighborhood.” (*Craig W. Hartman, Skidmore, Owings, and Merrill, E-mail, October 12, 2010*)

“I would like to commend the Planning Department for having developed an exceptionally complete EIR that addresses the myriad issues pertaining to the North Beach Library project. As you begin your consideration of the EIR, it is important to note that never was there a limitation on the library’s ability to determine the improvement strategy for a particular library; the language of the bond measure clearly indicates as much and appropriately allowed for the discretion of the library to ascertain the most prudent approach to improving the branch library system. ...

“It is precisely on the matter of future generations that your decision must be founded and the essential question answered—are we to provide the best library for present and future generations, or are we to sustain a lackluster building and by accepting another alternative, forever compromise library service to the community of North Beach? Once again I strongly and respectfully urge commission support for the EIR and the 701 Lombard St. project.” (*Charles A. Higuera, FAIA, E-mail, October 12, 2010*)

Response G-1

These comments express the opinion that the DEIR is adequate, complete, and accurate, and express general support of the proposed branch library and Master Plan.

The Planning Commission will consider the adequacy, completeness, and thoroughness of the EIR upon certification. As presented on p. 22 of the DEIR, “An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the proposed project” (Section 15121(a)). The EIR’s intent is to evaluate potential impacts of the project and present to the decision-makers a reasonable range of alternatives that reduce, avoid or eliminate project impacts.

Comment G-2: Comments that the EIR is inadequate, incomplete, and/or inaccurate.

“What became overwhelmingly clear upon reading this DEIR is that it consistently misrepresents, omits and factually distorts information. It appears to thwart the fundamental intent of CEQA by overtly championing the proposed project with subjective judgments and conclusions rather than providing decision makers with an unbiased analysis of the project.

“The DEIR is primarily deficient in the following ways: (1) an inadequate and inaccurate project overview and description, (2) the failure to adequately address the aesthetic impacts of the proposed project on the visual character of the surrounding historic area, on the scenic views, and on visual character of the Columbus Avenue streetscape. (3) the failure of the DEIR to honestly and objectively explore feasible preservation and expansion alternatives that would attain most of the basic objectives of the project and avoid the significant impacts of the proposed project.” (*Vedica Puri, Letter, October 12, 2010*)

“The DEIR is incomplete and inadequate.” (*Mary Lipian, E-mail, October 12, 2010*)

“The DEIR is incomplete and inadequate because reasonable adherence to normal city processes, planning / building codes and the SF General Plan has not occurred. Unfortunately, the current process has demonstrated a pattern of presumption of future outcomes—of code variances, contradictions of city policy/ legal mandates, selective criteria and a specific design direction. ...

“For any other project, the city would unlikely accept presumptions of the outcome of rezoning, spot zoning, street vacations, narrowly defined preservation alternatives. ... Like questionable large development practices, project sponsors are striving to force the outcome of planning decisions and approvals.

“For any other project, the city would not accept the entitlement process as a tool to force rezoning and planning outcomes. During the CEQA process, the Library nonprofit affiliates are using paid staff, consultants, large expenditures, public relations and grant applications to ram through entitlements.” (*Howard Wong, AIA, E-mail, October 12, 2010*)

“In fact, there are in my opinion many misleading statements, and/or statements that are subjective and lean toward approval (bias), and other facts that have been omitted from this DEIR in order to bring the

reader to the conclusion that this project would be beneficial to the North Beach Neighborhood.” (*Sal Busalacchi, Letter, October 7, 2010*)

“In my opinion the Report is replete with subjective misstatements and inaccuracies throughout. A lack of time precludes my enumerating them. However, I particularly take issue with the cursory statements in Chapter 4 (Environmental Setting, Impacts and Mitigation Measures) that the impact on the site and surrounding area would be “less than significant.” (*June Osterberg, Letter, October 12, 2010*)

“The DEIR of August 25, 2010, for a project—known as the Master Plan—to demolish the North Beach Branch Library and construct a new library on a lot at 701 Lombard Street, contingent on closing part or all of Mason Street, thence followed by a major re-organization of the Joe DiMaggio Playground, is deficient in several respects and needs to be revised or rejected.” (*Joan Wood, Letter, October 12, 2010*)

Response G-2

Comments state that the DEIR lacks objectivity, contains misleading statements, doesn’t follow city processes, or incorrectly concludes that impacts are less-than-significant are noted. In cases in which commenters provided more specific examples of deficiencies in the DEIR, these comments are addressed under other topics in this C&R document.

An EIR’s focus is to disclose a project’s potential to cause adverse effects on the environment. CEQA Guidelines 15064(c) states, “In determining whether an effect will be adverse or beneficial, the Lead Agency shall consider the views held by members of the public in all areas affected as expressed in the whole record before the Lead Agency. Before requiring the preparation of an EIR, the Lead Agency must still determine whether environmental change itself might be substantial.”

Regarding City processes and approvals related to the *Planning Code* and the *General Plan*, the EIR analyzes the proposed project, inclusive of all approvals that would be required to allow its implementation. The EIR, however, does not assume that the project’s approval is a foregone conclusion. Instead, it analyzes the physical environmental effects of the project resulting from reasonably foreseeable changes in the existing physical setting. Please see Draft EIR pp. 49–50, which list the approvals applicable to the project. As stated there, the Planning Commission must adopt *General Plan* and Priority Policy conformity findings. It is not the purpose of the EIR to make such findings.

The comments regarding city staff and consultant time are noted. These comments are beyond the scope of CEQA, which is focused on the disclosure of potential physical environmental impacts.

Regarding comments that the EIR is a step in guiding the project through the entitlement process, preparation of an EIR prior to project approval consideration is standard procedure for projects that may have a significant impact on the environment. The Master Planning Process for this project has been ongoing for several years, and the Notice of Preparation of an Environmental Impact Report was published in April 2009, about two years ago.

Please see response to comment AL-1, on page 153, regarding the range of alternatives analyzed. As stated there, the EIR analyzes two alternatives, in addition to the No Project Alternative, that would avoid the significant impact to historic resources associated with demolition of the existing library. Regarding “spot zoning,” please see response to comment LU-4, on page 77, which explains that the parcel where the library is proposed would be zoned ‘P’ or “Public,” consistent with the entire block to its east to which it would be merged. The concern of “spot zoning” does not apply to publicly owned property. The DEIR analyzes potential adverse physical effects associated with the rezoning of the 701 Lombard property, as part of the overall analysis of project effects, but the rezoning itself would not create separate physical effects.

Please see responses to comments LU-1 through LU-7, on pages 74 – 82, and AE-1 through AE-11, on page 96 – 184, for an explanation of how land use and aesthetic effects were evaluated. Please see response to comments PD-1 through PD-17, on pages 35 – 73, for a discussion of the project description. As stated there, the project description is sufficient for the purpose of environmental impact analysis pursuant to CEQA. Any corrections to the discrepancies in the project description do not constitute substantially new information.

See discussion of Cultural Resources, DEIR Chapter IV.C, for an evaluation of potential historic architectural resource impacts related to the demolition of the existing branch library.

Comment G-3: The EIR does not adequately discuss impacts to children.

“I would also like to say that a lot of the speakers have spoken to the impacts on buildings, the impacts on preservation, the impacts on traffic, nobody has spoken to the impacts on children; I think this is the best alternative and I don’t know if you could list an environmental impact on a child, but certainly this is – I believe the proposed project is the best alternative for the children of our neighborhood.” (*Bill Bondy, Public Hearing Transcript, October 7, 2010*)

Response G-3

The comment refers to impacts to children and states that the proposed project is best for children.

The primary focus of the EIR is to evaluate the potential for substantial, adverse changes on the environment. CEQA Guidelines 15360 defines “environment” as “the physical conditions which exist within the area which will be affected by a proposed project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic aesthetic significance. ... The “environment” includes both natural and man-made conditions.”

DEIR Chapter IV.A sets forth a discussion of Land Use and Recreation around the project site and within its vicinity. Schools and daycare facilities within the North Beach branch library’s service area are listed, as are parks and open spaces. Moreover, the user characteristics of the Joe DiMaggio Playground are described in the DEIR on pp. 74–77.

Comment G-4: The EIR does not adequately discuss cumulative impacts.

“Failure to consider cumulative impacts of this project together.” (*Sal Busalacchi, Letter, October 12, 2010*)

“There has been no calculation of the significant cumulative impact resulting from increase in the mass and bulk of a building in that location causing increased shadowing, elimination of a number of healthy trees, and loss of views of Coit Tower and St. Peter and Paul Church from the adjacent cable car line as well as by pedestrians and nearby residents.” (*Joan Wood, Letter, October 12, 2010*).

Response G-4

The commenters state that the EIR fails to consider cumulative impacts, particularly related to mass and bulk, shadow, biological resources, and views.

CEQA Guidelines Section 15355 defines cumulative impacts as “two or more individual effects, which, when considered together, are considerable or which compound or increase other environmental impacts.” Subsection (a) states that effects may result from a single project or a number of separate projects. Subsection (b) states that the incremental impact of the project, when added to other closely related past, present, and reasonably foreseeable probable future projects, can result in impacts that are individually minor but collectively significant. The DEIR, pp. 85–89, lists six foreseeable projects and evaluates whether the proposed Master Plan, in combination with any or all of those projects, would have a considerable contribution to cumulative impacts. Cumulative analyses also incorporate and consider the Planning Departments’ growth forecasts for the area.

Each section of the DEIR Chapter 4 (Land Use and Recreation, Aesthetics, Cultural Resources, Transportation and Circulation, and Shadow) includes an analysis of cumulative impacts. In addition, each section of the Initial Study (Appendix A of the DEIR) includes a discussion of cumulative impacts of those CEQA topic areas not discussed in the EIR.

The EIR includes an assessment of the entire project’s potential impacts, including demolition, new branch construction, reorganization of playground features, and operational effects of both the library and the playground. The EIR adequately describes the height, bulk and mass of the proposed branch and evaluates to the extent to which the proposed branch would cast shadows (see responses to comments WS-1 and WS-2, on pages 143 and 144, as well as DEIR Figures 35–46), eliminate street trees (see Responses LU-5, AE-2, AE-3, NO-1, NO-2, BI-1, BI-2) and affect views from public areas (DEIR pp. 112–125, as well as response to comment AE-1, on page 96).

Comment G-5: The EIR should explain that the proposed building would not accommodate neighborhood growth.

“No mention of how this new proposed building will expand with neighborhood growth.” (*Sal Busalacchi, Letter, October 12, 2010*)

Response G-5

The space needs of the proposed library are based on the Library Program (see Appendix C in the Master Plan report) which was compiled by a library planner, based on a community needs assessment and the Functional Program (Chapter 7 of the Branch Facilities Plan), in consultation with San Francisco Public Library (SFPL) staff. A key goal for all Branch Library Improvement Program (BLIP) projects is that the interior layout be as flexible as possible in order to accommodate future service needs, including those brought about by neighborhood growth. The open floor plan allows for this flexibility to accommodate potential future changes in service needs.

The library itself is not anticipated to substantially facilitate neighborhood growth. CEQA Guidelines Section 15126.2(d) provides guidance on a project's potential to cause growth-inducing impacts:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Population growth is discussed in the Initial Study (Appendix A of the DEIR) on p. 27. As stated there, the expanded library would result in a net increase in peak average hourly on-site population, and there would be no increase in the site's employee population. While the increase in visitors would be noticeable to immediate neighbors, it would not be expected to result in substantial population growth, which is typically associated with extension of municipal infrastructure or provision of new housing.

Project Description and Objectives

Comment PD-1: Eminent domain proceedings for 701 Lombard Street parcel; acquisition for public open space use; the 701 Lombard Street parcel should be considered recreational open space under existing conditions.

“For any other project, a parcel seized by eminent domain for open space would remain open space. Even though the triangle site was seized by eminent domain in 2004 for open space and purchased with Open Space Funds in 2007, the proposed Triangle Library is larger than the rejected 2004 condominium project.” (*Howard Wong, AIA, E-mail, October 12, 2010*)

“The draft EIR did not address the history and reasons and purposes for which that the open space was purchased. It is hypocritical and unjust to take the land via eminent domain, an extreme measure, purchase the land with open space funds and then turn around and build a library on that same plot of land.” (*Mary Lipian, E-mail, October 12, 2010*)

“The EIR is inadequate and incomplete in that it does not contain an accurate and complete history of the City’s acquisition of the triangle parcel at 701 Lombard. THD and other neighborhood organizations and individuals worked to prevent the construction of a proposed private development on the triangle parcel (proposed in 2002) because the proposal would have impacted scenic views of Telegraph Hill and Sts. Peter and Paul Church from Columbus Avenue, added shade to the existing North Beach playground, and threatened the loss of the mature trees on the site. Hundreds of signatures were collected on a Park Petition to *‘respectfully request the City and County of San Francisco to acquire the triangular parcel of land commonly known as 701 LOMBARD STREET (Block 74, Lot 1 on official City Maps) for purposes of a Park, in order to expand the North Beach Playground.’* With THD’s strong urging and support, the triangle parcel was taken by eminent domain by the City and County of San Francisco specifically for use as *‘open space’* by the Final Order of Condemnation in Case No. 429018 entered on July 6, 2007, by the Superior Court of the State of California for the County of San Francisco. It was acquired for the purpose of developing it into open space as part of the Park – to prevent the construction of a building on the triangle parcel and to discontinue its use as a commercial parking lot. The history of this specific site must be explained; if it were, the obvious contradictions in the current proposal to demolish would be evident. The failure to include the accurate history of the triangular parcel appears to be a deliberate effort to cloak the history of this site, which was intended to be open space.

“Describing the ‘baseline condition’ of the triangle parcel as a commercial parking lot is inaccurate, biased and misleading. The description of the “baseline condition” of the triangle parcel in the DEIR (Pages 27, 32, 56 and elsewhere) is inaccurate, biased and misleading, clearly intended to create the misconception that the only way this ‘commercial surface parking lot’ can be eliminated is by building a new building on it. As described in the comment above pertaining to the history of the acquisition of the triangle parcel, it was acquired by the City (under SF Recreation and Parks Department (SFRPD) jurisdiction) for addition to the park as “open space” not as a commercial parking lot. The fact that the SFRPD has not yet developed the parcel for open space, but has continued to operate it as a parking lot for the revenue it produces (about \$48,000 annually), does not change the purpose for which it was condemned. Please correct these intentionally misleading references throughout the EIR. ...

“The DEIR’s conclusion that only the proposed project can add 12,000 sq ft of new open space to the park is inaccurate and misleading and not based on actual numbers. The comparisons shown on Table 2 (Page 42) between the existing and proposed project ‘Outdoor Area’ square footage for the ‘Joe DiMaggio Playground’ are inaccurate and misleading and reflect a clear bias in favor of the proposed project. As stated above, the 4,119 sq ft triangle parcel must be considered part of the park open space in both the existing and proposed project conditions.¹ Clearly Mason Street could also be added to the triangle parcel as additional open space in both the existing and proposed project conditions. The numbers on Table 2 for “Outdoor Area” must be corrected to compare “apples to apples” based on the following:

Existing Conditions:

97,700 sq ft = existing playground, plus

4,119 sq ft. = triangle parcel acquired for addition to the park as open space

¹ If SFRPD has funds available to pay for the implementation of the proposed Master plan, we must assume it has sufficient funds to implement the much more modest project to finally convert the condemned triangle parcel into the promised park open space, which could be developed with or without the inclusion of Mason Street. At a minimum, the triangle parcel must be assumed to be included in the “Outdoor Area” for purposes of the existing condition.

101,819 sq ft (or 111,500 sq ft if 9,681 sq ft of open space within Mason St. is included)

Proposed Project Conditions:

97,700 sq ft of existing playground, plus

4,400 sq ft site of the demolished library

102,100 sq ft (without Mason Street) or 109,720 sq ft (with 7,620 sq ft remaining within Mason St. since the library will take up 2,061 sq ft of Mason St)

“Therefore, the net increase in total outdoor area between the “Existing Conditions” and the “Proposed Project Conditions” on Table 2 should show only 281 sq ft “Net Change” not 12,010 sq ft (without Mason Street)

“And if the Mason Street Right-of-Way were included in the open space calculations, the proposed project would actually *decrease* the total available open space available in the park by 1,780 sq ft. because the new library would occupy 2,061 sq ft of Mason Street. These numbers must be presented factually in the EIR. ...

“The in the Project Description section and throughout the DEIR, misleading references are made to a requirement that the triangle parcel “is located in the North Beach Neighborhood Commercial (zoning) District... “and must be rezoned for “Public P Use” (Page 32-34 and Page 56). As a matter of course, City-owned lands are re-zoned “Public P Use” shortly after acquisition. It is unclear why this did not happen. The site was acquired by SFRPD in 2007. Please include an explanation as to why this has not already occurred. These statements create the misconception that the only way this parcel can be re-zoned ‘Public P Use’ is by having the Board of Supervisors rezone it for the new library building.” (*Vedica Puri, Letter, October 12, 2010*)

“This brings me to the fact that the lot at 701 Lombard Street was purchased July 6, 2007 from developers who wanted to erect three-story condos on it. The purchase price—\$2,767,500 plus interest—came from the 2000 Proposition C Open Space Bond Fund. Part of the legal text of that Proposition states ‘No park land may be sold or leased NON-recreational purposes, nor shall any structure on park property be built, maintained or used for NON-recreational purposes, unless approved by a vote of the electors. Acquisition projects will include... purchase... of real property... for RECREATIONAL purposes, including, but not limited to, protection of natural resources.’

“A library is not a recreational purpose, nor has there been any re-vote about use of the lot for other than recreational use.

“This purchase occurred after considerable neighborhood controversy commencing in 2003. On October 16, 2003, in a public hearing, the Rec & Park Commission resolved to purchase the lot via Eminent Domain if necessary from those Prop C funds in order to create additional open space in our high need neighborhood. This was subsequently approved and on February 19, 2004, the Board of Supervisors voted a Resolution of Necessity for Eminent Domain, specifying again that this was for the development and maintenance of open space under the open space program.

“So it may be an invitation to litigation if the Triangle lot is to be built on rather than held for an eventual park. If a legal objection does not arise from a preservation group, the ousted developers could also

continue to harbor resentment.” (Joan Wood, *Letter, October 12, 2010*) ***Comment includes attachments regarding eminent domain proceedings, which are included in Attachment 1 of this document.***

“Thereby destroying the traditional open-space triangle of land on Columbus--acquired by the City by eminent domain--between Columbus and Mason Streets.” (June Osterberg, *Letter, October 12, 2010*)

“In 2004, I—and all of the residents of our neighborhood—were promised a park on the site of the Triangle at 701 Lombard. (This land was even acquired by eminent domain specifically for this purpose.) Where’s my park?

“Well, I must say that I feel somewhat deceived by the fact that we never got a park on this site.” (Sarah Kliban, *Letter, October 12, 2010*)

“There is inadequate or non-existent history of how the open space came to be. No image of the entitled condominiums planned for the site. No reference to the public effort and petitions that started the open space effort. No listing of the vote of the Open Space Committee or the Board of Supervisors, and no reference to the court’s order in the eminent domain taking of the site for open space. There is also no listing of numerous groups who opposed putting a building on the hard-won open space.” (Zack Stewart, *Letter, October 2, 2010*)

“It is an inadequate EIR and I feel bad to say that because Mr. Jacinto has worked very hard on it. Several things have been omitted. There are serious legal restrictions on the 701 Lombard Street lot and, if this plan goes forward, it may provoke lawsuits. It has to do with the lot being seized by eminent domain. I have looked throughout the EIR and I do not see any mention of that, it is a very serious omission. It was seized with the purchase of – they used open space funds, and those funds are restricted to recreational purposes on the lot, and a library does not qualify for that.” (Joan Wood, *Public Hearing Transcript, October 7, 2010*)

“It would be built on traditional open space.” (June Osterberg, *Public Hearing Transcript, October 7, 2010*)

“The triangle park, as you also heard earlier, was seized in 2004 by eminent domain for a park, and it was purchased in 2007 with open space funds. Only in 2008, after the 2007 Library Preservation Fund bond measure was passed, which gave the library revenue bond authority, was the new library even considered, and that was in 2008.” (Howard Wong, *Public Hearing Transcript, October 7, 2010*)

“And finally, the triangle was taken by eminent domain to be open space, it was bought with nearly \$3 million of open space money, which cannot be used for a non-recreational purpose. So, putting a library is defined as a non-recreational purpose in the General Plan. Putting a library on there is going to cause all kinds of problems, so I do hope that the EIR is revised to address some of the issues that have been raised tonight.” (Sue Cauthen, *Public Hearing Transcript, October 7, 2010*)

“A couple other things that were brought up, there was a question about, you know, I remember being here when we approved the condominiums on the triangle and then you know, it was overturned, and then it was seized by eminent domain, and I’m glad to hear that the process did get seized and there was some funding approved, and I guess what we’re going to have to figure out is, is it appropriate that the parkland

that is being provided is not necessarily on the triangle, but if the library is on the triangle and you end up netting out that parkland in between the street and where the library was, I would say that probably works for me if it makes for a better playground and everything flows, so, I mean, but that is something we would have to get an opinion on, probably, from maybe the City Attorney or whatever, get some kind of a decision as to whether that is appropriate.” (*Commissioner Antonini, Public Hearing Transcript, October 7, 2010*)

“Fails to note that preservation of the Triangle site as open space would create a fourth green area on Columbus between Fisherman’s Wharf and Washington Square. ...

“Fails to address legal aspects of building on the site. EIR should evaluate fact that land was taken by Eminent Domain to be open space and that it was purchased for \$2.8 million from the Open Space Fund, an entity whose fiscal resources can be used only to create open space or recreation. The General Plan specifically defines libraries as non-recreational uses.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

Response PD-1

The comments refer to the previous acquisition of the “triangle” parcel by the City. Commenters question whether the 701 Lombard Street parcel can be developed as a branch library, given that the intent of the previous parcel acquisition was for the development of open space. Commenters also question why the site was not zoned for public use when it was acquired. Several commenters also state that the EIR should describe the 701 Lombard Street parcel as open space and calculate open space square footage under existing and proposed conditions using this definition.

As stated on DEIR p. 32, CEQA Guidelines Section 15125 state 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 [NOP] is published...* from both the local and regional perspective. This environmental setting will normally constitute *baseline physical conditions* by which a lead agency determines whether an impact is significant” (*emphasis added*). Recent case law confirms that the actual physical conditions on the ground at the time of the issuance of the NOP are used for baseline conditions.² Therefore, regardless of the intent of acquisition of the 701 Lombard Street parcel, the parcel must be analyzed under CEQA as a surface parking lot under baseline conditions. The surface parking lot, which is not used as open space and functions as a commercial parking lot, is therefore not considered open space for the purposes of square footage calculations. For a more detailed discussion of open space calculations under existing conditions and the proposed project, including the relationship to Mason Street, please see response to comment RE-2 on page 87.

The comment that the proposed “Triangle Library” is larger than the 2004 condominium project is false. In 2001, the previous owner of the triangle parcel submitted an application to develop the

² In *Communities for a Better Environment v. South Coast Air Quality Management District* (March 15, 2010), the State Supreme Court clarified the appropriate baseline for environmental review for new projects, finding that CEQA requires public agencies to analyze the environmental impacts of a new project relative to actual existing physical conditions, rather than by comparing them to theoretical conditions based on permits granted for prior projects.

parcel with housing. That application proposed development of a 40-foot-tall building containing nine dwelling units in approximately 9,975 gross square feet of floor area and about 810 gross square feet of retail space (total floor area of 10,785 gross square feet), in addition to about 2,750 square feet of residential parking.³ This contrasts with the proposed library's floor area of 8,500 gross square feet. That condominium building would have been about 10 feet taller than and would have contained about 27 percent more floor area (excluding parking) than the proposed library.

Regarding acquisition of the triangle parcel, the 701 Lombard Street parcel was acquired by the City through eminent domain for use in the expansion and reorganization of the existing Joe DiMaggio Playground. The Board of Supervisors adopted a Resolution of Necessity to initiate eminent domain proceedings on February 10, 2004. Joint testimony before the Board by the heads of the City's Library and Recreation and Park Departments made clear that the acquisition of the 701 Lombard Street parcel was part of a collaborative process between the Library and the Recreation and Park Departments to facilitate both the enhancement and reorganization of the recreational facilities on the Joe DiMaggio Playground, and expansion of the North Beach Library.⁴ The proposed project is consistent with the longstanding intent of the Recreation and Park Department and the Library to increase open space associated with Joe DiMaggio Playground, permit expansion of existing facilities and improve the site plan for the playground, and accommodate a larger Library.

After trial in the eminent domain action, the San Francisco Superior Court issued a statement of decision holding that the City was authorized to take the 701 Lombard Street parcel by eminent domain, and finding that the Board of Supervisors' adoption of the resolution of necessity was supported by testimony of City officials that the City's acquisition of the parcel would serve two purposes: to provide additional green space in an underserved district for open space and parkland, and help to expand the North Beach library. The City took possession of the parcel in 2007.

The City purchased the 701 Lombard Street parcel with funds from multiple sources, including the Recreation and Park Department's Open Space Fund and the City's General Fund. The City Charter provisions governing the Park, Recreation and Open Space Fund provide that monies from the Open Space Fund will be expended "to provide enhanced park and recreational services and facilities." General Fund monies are not subject to any similar restrictions. In any event, the current proposal would enhance the recreational services and facilities available to the public at the Joe DiMaggio Playground as well as those provided through the North Beach branch library.

As described further in Response RE-2, the proposed project would increase the net open space available to the Joe DiMaggio Playground. In addition, while some commenters suggested that

³ San Francisco Planning Department, *Final Mitigated Negative Declaration, 701 Lombard Street*, December 21, 2002. Case No. 2001.1063E. This document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in File No. 2008.0968E.

⁴ Transcript of Board of Supervisors hearing, October 21, 2003; pp. B0408 – B0413 (as numbered in Superior Court eminent domain litigation). Available for review at the Planning Department, 1650 Mission Street, Suite 400, in File No. 2009.0968E.

the library is a “non-recreational use,” case law, as expressed by the California Supreme Court, recognizes libraries as “additional and ancillary means to promote the recreation and pleasure of those to whom the enjoyment of the park is devoted.”⁵ In terms of the *General Plan* policies regarding park, open space and other public uses, these policies are interpreted, considered and balanced by decision makers as part of their action on the proposed project. There is no direct adverse physical effect or conflict between these policies and the proposed project. Consequently, CEQA does not require further analysis of this issue. Finally, the Draft EIR did include a discussion of various *General Plan* policies, including these, and recognized a potential conflict with Phase 1 of the project (demolition of a historic resource under CEQA). In light of the entire project, including implementation of the Park Master Plan, this potential conflict would be offset. See Appendix B of the DEIR and responses LU-1 through LU-5 for more information.

Regarding the description of the proposed project as “infill development” (DEIR p. 63), the project would result in the redevelopment of an underutilized parcel (the 701 Lombard Street parcel) and an increase in urban public open space.

In terms of greenhouse gas emissions, the Bay Area Air Quality Management District has certified that the City and County of San Francisco has the equivalent of a Climate Action Plan, thereby removing the requirement to quantify potential greenhouse gas emissions provided that the proposed project, or its alternatives, does not conflict with the plan. The proposed project would be consistent with the Climate Action Plan, as detailed on DEIR pp. 63. Nonetheless, greenhouse gas emissions that would result from demolition and construction are included in the overall calculation of emissions, presented in the Initial Study (Appendix A of the DEIR), pp. 35. As stated there, the project would have a less-than-significant impact associated with greenhouse gas emissions.

Comment PD-2: EIR should have included discussion of original intent of library revenue bonds and/or general obligation bonds for the Branch Library Improvement Program.

“As Commissioners it is our obligation to provide safe, accessible, and modern branch libraries in every neighborhood of San Francisco. We are in the final stage of the largest building campaign in San Francisco Public library history. As the result of the \$105.9 million bond measure passed in November 2000 (see attached legislation), the Branch Library Improvement Program calls for 16 branches to be renovated, four leased facilities to be replaced with City-owned buildings, three branches to be replaced with new buildings, and the construction of the Mission Bay branch, the first new branch in 40 years. The new North Beach library will be the last project completed.” (*Jewelle Gomez, President, San Francisco Library Commission, E-mail, October 12, 2010*)

“The project managers never considered remodeling this library even when in 1988, Proposition A’s \$109 million bond was passed for a new Main Library and to upgrade all branch libraries. Not done. In 2000, another \$106 million bond was passed to renovate all branch libraries. Not done. The project managers have done nothing to bring it up to ADA codes since 1988. Now they use this as an excuse to tear down a building that can be built as well as the Marina library. By the way, the Marina Library was rated as #4 in

⁵ *Spires v. City of Los Angeles* (1906); 150 Cal. 64, at 67.

our seismic scale while the North Beach Library is rated #3. In a perfect world #1 is the best, but I see that #2 is adequate.” (Sal Busalacchi, Letter, October 12, 2010)

“Incomplete description of the November 2000 bond measure (Proposition A): The DEIR’s description of the November 2000 bond measure (Proposition A) is incomplete and, therefore, biased (Page 25). The significance of the omitted information cannot be overstated. In order to be complete the description must be changed to add the fact that, at the time of the 2000 election, said bond monies had been slated for retrofitting and refurbishing the North Beach Library, not demolition. This was made clear to the voters at the time. In the Voter’s Guide published by the League of Women Voters for the November 2000 election, the following statement was published and can be viewed on line at (<http://www.smartvoter.org/2000/11/07/ca1sf/meas/A/>):

‘Proposition A would authorize sale of \$105.86 million in general obligation bonds to renovate, modernize and expand 23 of San Francisco’s 26 branch libraries. The project would include funds for new buildings for four libraries and would pay for construction of a new branch in Mission Bay. It would also finance development of space for a city archive at Brooks Hall and a support center for the library system. No bond money could be used to renovate the Main Library and no money is needed for three branches that were recently modernized.

New buildings in the Glen Park, Ingleside, Portola, and Visitation Valley neighborhoods would replace the small, cramped leased quarters these branches currently occupy. The Mission Bay branch would be erected in an affordable housing area. In addition, the planned improvements include seismic upgrades at 15 branches and expansion of 13 branches, including more space for children’s services. The renovations would give the disabled full access to the branches, remove hazardous materials, modernize computer systems and improve electrical, plumbing and ventilation systems.’

“The fact that the San Francisco Public Library’s (SFPL) plan at the time this bond measure was placed before the voters was to renovate—not to demolish—the North Beach Library can be confirmed by a review of SFPL’s records. Please add this missing information into the text of the DEIR on page 26.

“The EIR is inadequate and incomplete in failing to discuss the 2007 Bond Measure (Proposition D)—Renewing Library Preservation Fund—as the primary funding for the new library. The EIR is inadequate and incomplete in that, although it discusses the 2000 bond measure (Proposition A), it fails to mention the 2007 bond measure (Proposition D) titled “Renewing Library Preservation Fund,” the revenue bond authorization that is the primary funding for the construction of the new North Beach library. A description and discussion of the 2007 measure, which renewed the Library Preservation Fund, must be added to include the following:

- (a) Add an explanation of the history and purposes of the Library Preservation Fund.
- (b) Which types of library expenses are intended to be covered city wide from this fund?
- (c) What percentage of annual property taxes goes to the libraries each year?
- (c) Explain the difference between general obligation bond financing (as authorized by Proposition A in 2000) and revenue obligation bond funding (as authorized by the Library Preservation Fund). Explain from what sources of funds each type of bond is required to be paid.

- (d) Has the SFPL already issued any of these revenue bonds to fund the construction of the proposed new North Beach Branch Library? If not, when will this occur?
- (e) At the time this bond measure was placed before the voters in 2007, did the official Branch Library Improvement Program plans show the renovation or demolition of the North Beach Library?" (*Vedica Puri, October 12, 2010*)

"The original intent, as described to the voter, of the three Library revenue bonds which will finance this ambitious project were described to the voter as enabling "Branch Library Improvements," not as rebuilding this or any other playground or even building new libraries. However, the Recreation and Park Department in 2008 became a co-sponsor of the North Beach Library Master Plan apparently to take advantage of the available money to achieve improvements in the Joe DiMaggio Playground at the same time. They brought to the table a vacant lot designated for Open Space." (*Joan Wood, Letter, October 12, 2010*)

"The bonds authorized by the electorate were for restoration of the North Beach Branch Library—not for promotion of extensive demolition and new construction and not for financing a DEIR covering a complete demolition and rebuilding of more than half of the North Beach Playground including the design and master plan." (*Zack Stewart, Letter, October 2, 2010*)

"From 1988 to 2008, the Library's Bond Measures, program, presentations and publications promoted renovation of the North Beach Library. In Official Ballot Arguments for all three Library Bond Ballot Measures, North Beach Library is to be 'renovated,' 'retrofitted' and 'restored'—establishing a legal direction and obligation." (*Howard Wong, AIA, E-mail, October 12, 2010*)

Response PD-2

The comments refer to propositions that authorize library funding, as well as SFPL's annual budget in general. Comments state that the intent of funding was not for new libraries or for renovation of parkland, but for renovation of existing libraries.

General obligation bonds and lease revenue bonds are options available to the City for financing long-life projects, such as buildings. The primary difference is what pledges or obligations are made to repay the bonds. General obligation bonds are a general obligation of the City and are repaid via the General Fund. The Library's Lease Revenue Bonds are a specific obligation of the Library and are to be repaid via the Library's operating funds.

The following propositions are discussed in the comments. Each proposition listed below was approved by the voters of the City and County of San Francisco.

- The 1988 bond authorized \$109 million to build the main library and branch library improvements.
- In 1994, voters authorized the establishment of a Library Preservation Fund to preserve branch services and fund longer hours.
- In 2000, the voters of the City and County of San Francisco approved Proposition A, which called for the incurrence of bonded debt in the amount of \$105,865,000 for the "acquisition, renovation, and construction of branch libraries and other library facilities, other than the

main library.” These were known as the “Branch Library Facilities Improvement Bonds, 2000.”

- The 2007 proposition authorized both extension of the Library Preservation Fund and gave the city authority to issue revenue bonds necessary to complete the Branch Library Improvement Program.

As indicated above, the Branch Library Improvement Bond (2000) explicitly stated that acquisition, renovation, and construction of new libraries would be undertaken pursuant to the bond program. Therefore, construction of a new North Beach Branch Library is within this description.

As stated in the DEIR on pp. 25–28, the proposed project has undergone considerable public outreach and scrutiny related to the proposed Master Plan. Therefore, the demolition and construction components of the project have been both disclosed to, and discussed with, the community. As described in the DEIR on p. 26, the library has major structural deficiencies that could result in major damage resulting from seismic activity. A stated objective of the project sponsors is to provide a library that meets the current San Francisco Building Code requirements for seismic safety (DEIR, p. 29). Decision-makers will evaluate the project’s relationship with this and other objectives by making findings of the project’s potential impacts and benefits in the context of a General Plan review when they consider project approval.

The difference between revenue bonds and general obligation bonds, the SFPL budget, and speculation of the intent of voters are beyond the scope of CEQA. Also, the seismic hazard rating of other libraries is beyond the scope of this project. The purpose of the EIR is to analyze environmental impacts of the proposed project. Conditions described in DEIR relate to physical conditions at the time the EIR was prepared in accordance with CEQA Guidelines Section 15125. The project, as proposed, formed the basis for analysis in the EIR, and the EIR’s findings are related to impacts associated with demolition of the existing branch and new construction.

Regarding funding of playground improvements, the funding for branch library improvements would not be applied toward playground improvements contemplated under Phase 2 of the proposed project. To the contrary, as stated in response to comment PD-4, on page C&R-47, and in the Draft EIR on p. 49, San Francisco Recreation and Park Department (SFRPD) has not identified funding for Phase 2 of the proposed project.

Comment PD-3: Comments requesting clarification regarding usable or assignable space in the proposed library building, comparison of the proposed library’s assignable and non-assignable space ratios to library standard ratios, and comments that the project does not meet those standards relative to the EIR’s Project Objectives.

“According to the table on page 42, it appears that ‘usable’ or ‘assignable library space’ in the proposed new library would be:

Children = 950 sq ft

Teen area = 435 sq ft

Adult= 1,910 sq ft

Program = 660 sq ft

Staff work area = 635 sq ft

“Based on these numbers, the proposed new library would have a total of 4,590 sq ft of ‘usable’ or ‘assignable’ space out of its total 8,500 sq ft, which would equate to 3,910 sq ft of ‘service space’ or 46% of the total space, would be for non-usable library space. Is this correct?

“Is 46% for non-usable or service space considered ‘operationally efficient’ in the design of a new library? How does this compare to the industry standard for operational efficiency in a library?” (*Vedica Puri, Letter, October 12, 2010*)

“Number two, it is a substandard library because they have 43.3 percent non-assignable space inside that. That is actually two percent better than the old library that we have. We are going to get 1,200 square feet more useable out of that library, but if you remodel the other one, you’ll get much more out of that library. All of those are in the papers that I have just given you. What else?” (*Sal Busalacchi, Public Hearing Transcript, October 7, 2010*)

“In the terminology of Library Design Standards, non-assignable space is that portion of a building’s floor space that cannot be applied or assigned directly to library services. Some representative types of non-assignable spaces are furnace rooms, janitor’s closets, telecommunications closets, storage rooms, vestibules, corridors, stairwells, elevator shafts and rest rooms. Such spaces are necessary to support the operations of the building, but cannot be used directly for library services.

“Non-assignable space generally comprises about 25 to 30 percent of the gross square footage of the finished building. The final allocation of non-assignable space will depend on the efficiency of the library design, the size of the project, whether the project involves new construction or alterations, and possible site constraints, among other factors. A smaller building is more likely to have a larger proportionate non-assignable space allocation.

“The new triangle library building proposed in North Beach is new construction with constraints. The non-assignable space is 43.58 percent and is much greater than the usually allotted 20 to 30 percent of the gross square footage because:

- (1) The triangle space is too small for a library---even with construction over 19 feet into the Mason Street public-right-of-way (requiring rezoning and spot zoning).
- (2) Acute-angled comers cramp efficient library layouts (referred to as dead zones).
- (3) The building has a second floor because of ground floor limitations.

PROPOSED NORTH BEACH LIBRARY SQUARE FOOTAGE

“As presented by the North Beach Library Master Plan for the Triangle Library

- Total Square Foot (Triangle Library) 8,500 sf
- Adult Area, Assignable, 1,965 sf

- Children’s Area, Assignable, 1,050 sf
- Teen Area, Assignable, 680 sf
- Staff Work Area, Assignable, 670 sf
- Staff Lounge, Non-assignable, 170 sf
- Bathrooms, Non-assignable, 315 sf
- Mechanical/Stairs/Other, Non-assignable, 3,220 sf
- Total Assignable Space, 4,795 sf
- Total Non-assignable Space, 3,705 sf

“The non-assignable square footage for the triangular North Beach Library Branch is 43.58 percent of the gross square footage. This percentage is much greater than the usually allotted 20 to 30 percent of the gross square footage---an extremely poor cost to assignable space ratio.

“Also, note that the triangular library cuts the small ground floor into separate areas for Adults, Children and Teens, whereas open space planning allows greater flexibility and spatial quality.

“For an 8,500 square foot building, if the maximum of 30 percent allotted square footage is used for non-assignable square footage, the non-assignable square footage should be 2,550 square feet. The difference (3,705 sf – 2,550 sf) is 1,155 square feet of lost usable assignable space. With Library Design Standards of 25 to 35 square feet per library user, an additional 1,155 square feet could create 33 to 46 more computer stations. ...

“The existing North Beach Library has 2,510 square feet of non-assignable space, or 47 percent of the gross square footage. The difference between the two is only 3.42 percent. Unfortunately, the City Library is offering a sub-standard library and inefficient expenditures of \$10 million dollars.” (*Sal Busalacchi, Letters, October 12, 2010; Letter, October 7, 2010*)

“Ignores fact that the Triangle library has 43% of unassignable space, compared to an average of 25%. Also ignores the woefully crammed first floor of the Triangle library, where essential services are concentrated.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

Response PD-3

The commenters request clarification regarding the terms “assignable” and “usable” library space. Commenters question whether the proposed project would result in a library with a percentage of assignable space comparable to other libraries or to industry standards.

“Assignable”

The term “assignable” was used only once in the DEIR, in a footnote 107 on p. 174 related to Planning Code provisions for parking. That footnote is revised as follows to clarify that the discussion of assignable space in that context is not relevant because the proposed project would require a rezoning to a P (Public) Use District (deleted text shown in ~~striketrough~~):

Planning Code Section 234.1 states that P Districts do not have parking requirements for libraries. ~~Because the library site is being re-zoned from the North Beach Neighborhood Commercial District (NCD), the parking requirements of that nearby district were examined. For the North Beach NCD, pursuant to Planning Code Section 722.22, institutional uses are not required to provide parking if the "occupied floor area" is less than 5,000 square feet. Although the new library will be 8,500 square feet, the library and architect have determined that 3,750 square feet of the new building would be unassignable floor area, and therefore the "occupied floor area," as defined in Planning Code Section 102.10, would be less than 5,000 square feet. Therefore, no off-street vehicular parking would be required by the North Beach NCD, should the Planning Commission approve the project with Conditional use authorization and not rezone the 701 Lombard Street project site.~~

The DEIR did not provide a discussion of "assignable space" or "non-assignable space."

The Planning Code does not discuss "assignable" vs. "non-assignable" space in libraries. However, the Planning Code does distinguish between "gross floor area" and "occupied floor area," which is a similar classification of square footage. Planning Code Sections 102.9 and 102.10 define gross and occupied floor area. As stated in Section 102.9, gross floor area is the sum of the square footage of several floors of a building, as measured from the exterior faces of the exterior walls. Gross floor area includes most interior space in a typical building, including, among other things, stair wells and elevator shafts at each level and mechanical space (unless it occupies an entire floor). In contrast, as stated in Section 102.10, occupied floor area is the portion of gross floor area that is capable of being devoted to a principal, conditional, or accessory use. Occupied floor area does not include exterior walls, mechanical equipment spaces, restrooms, storage spaces for building maintenance, and other incidental spaces.

Regarding "Library Design Standards," the Library Bond Regulations, which became effective in 2002, and all libraries built with state funding conform to the California Administrative Code, Title 24, Part 1 (the California Building Standards Code). Chapter 16, Article 5:2 of the Part 1 of this code defines non-assignable space for libraries as: "utility areas of a building required for the function of the building, including stairways; elevators; corridors and interior walkways; public lobbies; restrooms; duct shafts; mechanical rooms; electrical closets; telecommunications closets for voice, data, electrical, security and fire systems; janitor's closets; fireplaces; interior and exterior wall thickness; and exterior amenities that are part of the building but not enclosed, such as loading docks and covered patios, porches, and walkways."

Assignable square feet in libraries are spaces dedicated to public use and include the collection, seating, computers, meeting/program rooms, copy area, etc., as well as staff support spaces such as the staff break room, work room for materials processing, back of house work areas, and staff restrooms.

LibrisDesign, a planning tool for California libraries, indicates an industry standard range from 20 percent to 35 percent for non-assignable spaces for all size libraries.⁶ The proposed North Beach Branch Library would have 36 percent non-assignable space, partially due to its two-story

⁶ Linetzky, Mindy, Branch Library Improvement Program, personal communication with ESA, December 14, 2010.

layout. This percentage of non-assignable space is less than the approximately 43 to 47 percent non-assignable space indicated by the commenters.

The Potrero Branch, which is another two-story library within the SFPL system, was recently renovated. That building comprises approximately 36 percent non-assignable space.⁷

“Usable”

The term “usable” space was used at several points throughout the EIR. The intent was to convey that “usable” space is “assignable” space: spaces dedicated to public use that include the collection, seating, computers, meeting/program rooms, copy area, etc., as well as staff support spaces such as the staff break room, work room for materials processing, back of house work areas, and staff restrooms. The following edits are made to the DEIR to remove the term “usable” and replace it with “assignable” to avoid confusion (these edits are made regarding only internal library space, as the term “usable” is employed in several places beyond those discussions; (new text is shown double-underlined; deleted text is shown in ~~striketrough~~):

On page 14, the last sentence of the last full paragraph is edited as follows:

Alternately, if the elevator tower is placed within the existing library’s interior, this alternative would result in a net decrease in programmable library square footage by about 220 square feet and would result in less overall library ~~service~~ assignable space at the North Beach Branch than what currently exists and less than most other branch library facilities.

On page 15, the last sentence of the second full paragraph is edited as follows:

This alternative would yield approximately 5,290 square feet of ~~usable~~ assignable library space, plus 4,330 square feet of ~~service~~ non-assignable space, including existing spaces, though its multiple-level layout and L-shaped design would reduce operational efficiency and require additional library staff.

On page 26, the second-to-last sentence of the last full paragraph is edited as follows:

Providing staff on multiple floors generates staff costs and results in less ~~usable~~ assignable library space, with more space devoted to stairs, elevators, and duplicated functions.

On page 34, the last sentence of the last paragraph is revised as follows:

The building contains approximately 3,050 square feet of assignable space (2,520 sf of reading room space and 530 sf of staff working space) and; 2,280 sf of ~~circulation, service, and mechanical non-assignable space~~; and 530 sf of staff working space. The branch library was designed by Appleton & Wolfard Architects in the 1950s and was constructed between 1958 and 1959 on a then-existing playground.

On page 40, the sixth sentence of the first paragraph is revised, and a new seventh sentence added, as follows:

⁷ Linetzky, Mindy, Branch Library Improvement Program, personal communication with ESA, February 14, 2011.

The second floor would contain assignable spaces, such as a community / program room, restrooms, ~~service and mechanical spaces~~, a staff lounge, and circulation space. It would also contain non-assignable spaces, such as mechanical space and circulation space.

On page 40, the second sentence of the third paragraph is revised as follows:

Neither operating hours nor ~~usable~~ assignable space within the existing library would be affected by construction.

On page 42, Table 2 is revised (revised table included in Section D, p. C&R-201), as shown on the following page, to correctly state that the existing library is 18 feet tall as measured from Mason Street, as well as to clarify assignable and non-assignable spaces within the library.

On page 210, the last sentence of the second full paragraph is revised as follows:

If it is renovated, portions of the ~~usable~~ assignable space could be temporary closed or permanently altered so as to become non-assignable.

On page 213, the third sentence of the third full paragraph is revised as follows:

It would not expand the library (it would result in a reduction of ~~usable~~ assignable floor area between approximately 4 percent and 10 percent), and therefore would not meet objectives to increase collection size, programmable space, or to provide a program room.

On page 237, the last full paragraph is revised as follows:

The Preservation and Rehabilitation Alternative would avoid the proposed project's significant and unavoidable impact to historic architectural resources. This alternative would also result in a stabilized library building that meets SHBC requirements for seismic safety. However, a consequence of implementing this alternative would be displacement of the site's existing westernmost tennis court and / or less ~~usable~~ assignable library space. Programmatic challenges of the existing library would persist. This alternative would not meet most objectives of the proposed project.

“Service”

The term “service” space was used at several points throughout the EIR. The intent was to convey that “service” spaces are “non-assignable” spaces. Page 14 of the EIR incorrectly used the term, nonetheless. Several of the above-noted edits to the DEIR remove the term “service” and replace it with “non-assignable” to avoid confusion. These edits are made regarding only internal library space, as the term “service” has other uses related to traffic, the area of residence of patron population, and other discussions.

Other Comments

Regarding separate areas for adults, children, and teens, this is a requirement for all new and renovated libraries under the Branch Library Improvement Program. All of the 24 branch projects are designed with separate areas. The specific allocation of space in the proposed North Beach Library is presented in Table 2 of the DEIR on p. 42.

Some commenters state dissatisfaction with the proposed project's percentage of assignable space and advocate for preservation or expansion of the existing library. Commenters state that preservation could result in a higher percentage, or more overall, assignable space. These comments are noted and relate to the merits of the project, not the adequacy of the DEIR. All impact analyses in the EIR consider the intensity of use based on the proposed 8,500 sf library (minus the square footage of the existing library because that exists in the baseline).

Alternatives to the proposed project are analyzed in Chapter 6 of the EIR. Regarding assignable spaces under each alternative, please see response to comment AL-14 on page 193. Please also see the above-noted text changes to the EIR to clarify "assignable" space.

Comment PD-4: Project Description is incomplete in that it does not have a full description of the Interim scheme for Mason Street, it states that Phase 2 of the project is "conceptual," and it includes inadequate discussion of Phase 2's funding and timing.

"The project description in the DEIR never mentions that the Recreation and Parks department have no money to implement phase II of the North Beach Public Library and Joe DiMaggio Playground Master Plan Project. It is assuming future money and everyone is lead to believe that they would have a useful playground therefore we get signed petitions in favor of moving the library. These are very misleading for only one purpose. ...

"In the DEIR there and in the Recreation and Park Department outreach there is no mention that the Recreation and Park department do not have any money to implement phase II and have been misleading the toddler moms and public in general including myself into believing that they would we would all get a larger play area if the old library is destroyed and a new one built on 701 Lombard Street." (*Sal Busalacchi, Letters, October 7, 2010; October 12, 2010*)

"Project Description of the Master Plan is inadequate and is not stable and finite as required by CEQA. As shown by our comments on the DEIR's inadequacy, incompleteness and lack of information set forth in above in Nos. 6, 7 & 8, the DEIR lacks a stable and complete description of the proposed Master Plan for the reorganization of and improvements to the outdoor features of Joe DiMaggio Playground. It is not surprising, then, that the DEIR describes the proposed Master Plan, which is the subject of this EIR, as '*conceptual and subject to ongoing refinement based on community input*' (Page 45, footnote 29). Further, the DEIR states: '*[t]he landscaping plan of Phase 2 of the project is currently schematic...*' (Page 45).

"As to Phase 1 of the Master Plan for the playground, the DEIR reveals that these plans are incomplete and unknown at this time. The DEIR admits that the "Interim" or "Phase 1" plan for the site of demolished library is unknown, stating that '*the scope and design of this space, which would be for some form of recreational use, would be developed [in the future] in conjunction with the community, SFRPD and SFPL*' and only describes generally what it "could" entail (Page 43). As to the "Interim" or "Phase 1" plan for Mason Street, the DEIR says that: '*an interim scheme would be developed to address improvements on the vacated portion of Mason Street.*'

“The DEIR fails to disclose which entity—SFRPD or SFPL will be financially responsible for designing and implementing this Interim plan. Please discuss this issue.

“Project Description of the Master Plan is further inadequate in that it contains no information as to the potential timing for the implementation of proposed Master Plan for the reorganization of and improvements to the outdoor features of Joe DiMaggio Playground. The DEIR states on page 2 that timing for the implementation of Phase 2 of the proposed project (i.e. the reorganization and improvements to the park) would be dependent on project funding. In light of SFRPD’s current budget crisis, this could deprive the neighborhood of usable open space and impact the surrounding neighborhood aesthetically for a long period of time. In light of SFRPD’s current financial situation, the DEIR’s lack of a stable and finite plan for Phase 1 is even more critical.

- (a) What is the fiscal feasibility of implementing the Master Plan? Has there been a budget analyst report? Where will the funds come from? As stated in the DEIR, the ‘*SFRPD currently has \$1.7 billion in capital improvements system-wide...*’ (Page 249).
- (b) At this time of unprecedented budget cuts, when SFRPD staff is being cut and even the clubhouse at the Joe DiMaggio Playground has been closed due to budget problems, how feasible is it that SFRPD will be able to implement the proposed Park Master Plan within the next 5 years, 10 years? How is it possible that SFRPD can’t afford to staff the clubhouse in the playground but can proposed to fund a multi-million dollar reorganization of the entire park?
- (c) Is the renovation and reorganization of the entire park (i.e. the implementation of the proposed Master Plan Project) included in the following: 1) the Five Year Strategic Plan, 2) the Five Year Capital Plan, 3) SFRPD’s Operational Plan, and 5) SFRPD’s current budget? If the proposed Master Plan project is included in these plans and budget, please discuss when each was amended to incorporate the proposed Master Plan project.
- (d) In the most recent budget report, the SFRPD General Manager proposed in his budget contingency plan to charge SFPL rent for libraries located on SFRPD property. If this plan implemented, how would the new rent be calculated?” (*Vedica Puri, Letter, October 12, 2010*)

Response PD-4

Commenters state that the DEIR does not provide an adequate description of the Interim Design or of Phase 2 of the project. Comments question what would be the funding mechanism for the Interim Scheme for the design of Mason Street. Commenters also state the DEIR does not acknowledge that there is not funding currently in place to implement Phase 2.

The Planning Department considers the project description adequate for purposes of CEQA. While the exact materials or specific design treatments for the Interim Scheme are not yet known, the use and functionality of Mason Street as it relates to the proposed branch library and adjacent playground are stable enough to assess potential environmental impacts associated with implementation of the proposed Master Plan. It allows for an understanding of reasonably foreseeable changes that may result in physical effects on the environment (e.g., changes of use from roadway to recreation; changes in dimensions of existing spaces; and changes in materials that could be used in the interim). In light of current budget constraints and forecasts, the project

proposes Interim Design treatments. As discussed on DEIR p. 43, SFRPD and SFPL will coordinate to finalize the design and implementation of the Interim Design. It is the responsibility of both departments.

In addition, the components of Phase 2 of the proposed project are described in the DEIR on p. 45, including the excavation of the children's play area, the relocation of the play area and the tennis courts, and the improvements to the multipurpose hardscape area. Although the exact materials that would be used are not yet determined, the plan's components provide enough detail to allow for analysis of potential environmental effects. Please also see response to comment RE-2, on page, 87, which details conceptual square footages of the playground after Phase 2 of the proposed project.

The DEIR sets forth an estimated construction schedule and phasing timeline on pp. 43 and 44. Phase 1 is estimated to take 20–24 months; Phase 2 is estimated to take about 10 additional months.

Regarding SFRPD charging SFPL rent for libraries located on SFRPD property, SFRPD does not charge the San Francisco Public Library rent for libraries which are located on park property. If this would be done in the future, a method for calculating that rent would need to be determined.

Funding for the project's second phase has not yet been secured. As stated on DEIR p. 49, SFRPD has applied for a state grant and will seek additional funding to undertake the second phase of the project. The EIR discloses that the project has not secured funding and does not intend to mislead the public with respect to financing of the project's future phase. SFRPD generally uses grants, public general obligation bond funding, and philanthropic gifts to fund capital improvements.

When funding is available to fund the park improvement, the project could be implemented. Funding for programming of clubhouse facilities generally come from the General Fund, whereas capital improvements often have other funding sources.

The master planning process and environmental review are part of the Recreation and Parks Department's current capital and planning program. In addition, the master planning process for Joe DiMaggio Park is identified in the City of San Francisco's 10-year capital plan.

Comment PD-5: The EIR does not adequately describe the community outreach, lack of community outreach, community input received, or organizations that are against the proposed project.

"The DEIR contains inaccurate statements as to the involvement of THD, which must be corrected: ...

"On Page 28 (2nd Paragraph), the DEIR states correctly that SFRPD and the SFPL did not contact THD for a presentation to our board of the proposed Master Plan and library project until Spring of 2010. However, it must be stated that THD sent numerous letters to these agencies that were not answered or responded to, starting in March of 2009. We attach copies of several of these letters for inclusion in the EIR.

“Also on Page 28 (2nd Paragraph), the DEIR states that, at the request of the THD and other neighbors, ‘story poles’ were erected ‘to provide a built representation of the proposed library at the 701 Lombard site in order to convey to the public a sense of the proposed library’s height and footprint.’ it is true that THD requested these story poles in writing on several occasions, but the DEIR is misleading and must be corrected to state that in spite of these requests, THD was not notified that the poles had been erected and that such poles were removed before our board members and other members of the public knew they had been placed and subsequently removed. Please include additional information in the DEIR regarding the erection of these story poles:

- (1) Please include photos of the story poles in the EIR.
- (2) On what date were the story poles erected?
- (3) On what date were they taken down?
- (4) During what period (indicate beginning and end dates) did the City close Mason Street as a “temporary park”?
- (5) Why was THD not notified that these story poles were erected?
- (6) What information was posted at the site to inform the public what these poles were intended to show?
- (7) Please include a photo or other representation of the notice posted on site to describe what the story poles were intended to show.
- (8) If nothing was posted, how could the public know what they were/what they were intended to show?”

“The DEIR does not provide details of the interviews with community stakeholders. The DEIR contains an unsupported statement that ‘a community needs assessment was conducted, that included interviews with community stakeholders about materials, facilities, and services and a community survey analysis.’ (Page 27)

- (a) Please include a list of all ‘community stakeholders’ interviewed as a part of this assessment.
- (b) Please add to this paragraph the fact that THD was not interviewed during this assessment process. Why was THD not considered a ‘community stakeholder’? (*Vedica Puri, Letter, October 12, 2010*)

“I would like at this time to remind this commission that the Telegraph Hill Dwellers, the North Beach Neighbors, National Trust for Historic Preservation, San Francisco Architectural Heritage, DOCOMOMO, San Francisco Preservation Consortium, historians and preservation professionals, The Library Citizens Advisory Committee of the Board of Supervisors, Coalition for San Francisco Neighborhoods, San Francisco Tomorrow, ParkMerced Residents Organization, Sunset Parkside Education & Action Committee, Coalition for a Better North Beach Library & Playground, North Beach Association, Save Mason Street organization, Friends of North Beach Library are not in favor that this building is to be built on 701 Lombard Street. Commissioners, these represent thousands of people. I

myself have submitted 500 petitions against the closure of Mason Street to Michael Jacinto, MTA, and Supervisor Chiu. There is no mention of all of these groups of people who oppose this project.” (*Sal Busalacchi, Letter, October 7, 2010*)

“We are all here because we all believe in democracy and listen to the will of the people. Please indulge me; I would like to read to you a list of organizations whose combined membership is in the thousands. These are never mentioned in the DEIR. I do not see any regard toward any of these groups that are against this building. These represent thousands of citizens in our city.

National Trust for Historic Preservation
San Francisco Architectural Heritage
DOCOMOMO
San Francisco Preservation Consortium, historians and preservation professionals
Telegraph Hill Dwellers
North Beach Neighbors
The Library Citizens Advisory Committee of the Board of Supervisors
Coalition for San Francisco Neighborhoods
San Francisco Tomorrow
Parkmerced Residents Organization
Sunset Parkside Education & Action Committee
Coalition for a Better North Beach Library & Playground
North Beach Association
Save Mason Street organization
Friends of North Beach Library.” (*Sal Busalacchi, Letter, October 12, 2010*)

“I think we are here to address the EIR, not get into a debate with some of the misstatements I have heard, but I just have to say that the first community meeting was in 2008, and I do not know how this project is said to have been in process for seven or eight years.” (*Joan Wood, Public Hearing Transcript, October 7, 2010*)

Response PD-5

The commenters generally request additional information regarding project sponsor outreach to the community. Commenters request specific information related to the community needs assessment and the temporary closure of Mason Street.

During the library community needs assessment, the project sponsors interviewed the following community stakeholders:

- Tan Chow, Chinatown Community Development Center
- Tom Whelan, community newspaper publisher
- Marsha Garland, North Beach Chamber of Commerce
- Chuck Thomas, North Beach Neighbors
- Marc Bruno, St. Vincent de Paul Society
- Elizabeth Diaz, Parent-Teacher Organization, Saints Peter and Paul Salesian School
- Tony Gantner, North Beach Merchants

- James Knoebber, Tel High Neighborhood Center

A description of the public outreach undertaken by the project sponsors during the Master Plan process is provided beginning on DEIR p. 27. A list of organizations that received direct presentations from the project sponsors is provided on p. 28. The Telegraph Hill Dwellers members were invited to Master Planning meetings.

Mason Street was closed between August 1, 2009, and September 27, 2009. The San Francisco Department of Public Works placed story poles at the site on September 11, 2009, and the poles remained there until September 27, 2009. Flyers describing the purpose of the story poles were posted at the site. As stated on the flyers, the story poles showed the location and height of the proposed library. A press release was issued the same day. Photos of the story poles and the public notices posted at the project site are included in Attachment 3 of this document. The project sponsors, as well as the City and County, adequately posted notices regarding the street closure.

The list of organizations cited by the commenter as not supportive of the proposed library at 701 Lombard Street, as well as the petition cited by the commenter, is noted.

Also, the commenter's attached letters from Telegraph Hill Dwellers to the project sponsors are noted. SFPL received a letter from the Telegraph Hill Dwellers on August 14, 2009, as well as a letter from Susan Brandt Hawley on behalf of the Telegraph Hill Dwellers on August 7, 2009. The City sent a letter in response on September 3, 2009. In April 2010, SFRPD staff Karen Mauney-Brodek e-mailed the commenter to arrange an in-person meeting with members of Telegraph Hill Dwellers. The meeting occurred on May 11, 2010. Both SFRPD and SFPL staff attended the meeting, answered questions about the project, and gathered feedback from Telegraph Hill Dwellers members present. The commenter states that Telegraph Hill Dwellers have not been considered a community stakeholder; the comment is noted.

The purpose of the Notice of Preparation scoping process (as well as the comment period for the Draft EIR) is for the public and agencies to submit comments regarding the potential environmental effects of the proposed project that should be studied. The purpose of the EIR is not to enumerate in detail each correspondence between every neighborhood organization and the project sponsors outside of the EIR process, but rather to evaluate the physical environmental impacts of the proposed project.

Comment PD-6: The proposed project will not meet the project sponsor's objectives to keep the library open during construction, and to provide a new and expanded library with enough space to accommodate library demand. The objectives and reasoning are biased in favor of the proposed project.

"Please note that this building had no damage during the big earthquake of '89. The Draft EIR mentions that the roof leaks ... this is not a reason to tear down this building.)" (Sarah Kliban, Letter, October 12, 2010)

“On page 3 there is a statement that says “that a new children’s play area would be constructed in the center of the block in the location of the former tennis courts and closer to the restrooms.” On page 34 this statement says “the restrooms serving the park are attached to the library structure.” The two bathrooms stated on page 34 are not only next to the library structure they are also in the children’s playground. The children where they are now are about as close as you can get to bathrooms. They don’t need a whole new section so they can be closer to the other bathrooms. Statements such as this is misleading and show the bias of this report. ...

“The objectives of the project have not been met with the proposed building on the triangle site. The project sponsors’ tell us they will provide us with enough space to accommodate adequate shelving for more book and other materials, but a normal square building of 8,500 square feet would have more books, fixed computers, seating, and tables: larger separate distinct areas for adults, teens, and children. This building has less assignable space because of its shape. The project sponsors’ said they would develop a new branch library that is cost effective to build and operate. The project sponsors’ would lead us to believe that a triangle building is more cost effective to build and operate than a rectangle building. Building a triangle space is never cost effective. There are dead zones in triangle spaces. There are no ground floor windows because the need for shelving space for the books against the walls. There is no mention of the wasted air space that needs to be heated and cooled. These triangular buildings as compared to the same size rectangular buildings are not as cost effective. ...

“This DEIR boost the fact that this library project has 18 computers. There are 10 computers in the adult area, 6 computers in the children’s area and 2 computers in the teen area. In an 8500 square foot space there should be an additional 36 to 44 more computers. As it stands now, if classes of 30 children wanted learn how to use computers, most of the children would have to do without because we would not have a large enough area to house the necessary computers. Across the street from the proposed new library, Telegraph Hill Neighborhood Association (TeIHi) has 18 computers in a 440 square feet of space. We are getting a sub-standard library because of space constraints with no room to grow in the future.

“In the Recreation and Park Department’s application (February 26, 2010) to the 2008 Statewide Park Development & Community Revitalization program, page 19, the applicant states that the North Beach area has 3,887 people who live below the poverty line. This number was based on a ½-mile radius from the project location.

“Part of the public library’s mission is to help bridge the digital divide. A 2006 Study found that “72.5 percent of library branches report that they are the only provider of free public computer and Internet access in their communities.” A 2008 Study found that “100 percent of rural, high poverty outlets provide public Internet access, a significant increase from 85.7 percent last year.

“The American Library Association (ALA), addresses this role of libraries as part of ‘access to information’ and ‘equity of access,’ part of the profession’s ethical commitment that “no one should be denied information because he or she cannot afford the cost of a book or periodical, have access to the internet or information in any of its various formats.’ In addition to access, many public libraries offer training and support to computer users.

“Thus, libraries must efficiently plan for maximum numbers of computer stations and flexibility for rapidly transforming digital technology.

“Growth of Libraries...

“In Library Design Standards, the recommended time frame to allow for growth and expansion is 20 years.

“If the triangular library is built; because of its configuration and site constraints, it will have no room to grow for future needs. A new triangular library has wasted non-assignable space and limited computer stations (as few as 18 or 19). An 8,500 square foot library should have 51 to 64 more stations than the present plan. For example, if a class of 30 school children wanted to use the computers, there would be insufficient stations for the children as well as the library patrons. If we are to educate our children and future generations, we need a library that can grow, has more computers and less wasted space. (*Sal Busalacchi, Letter, October 12, 2010; Letter, October 7, 2010*)

“The handicapped expert who has reviewed the DEIR points out that the elevators, doors, bathrooms, signage, and other handicapped requirements will be the same cost and type for either the restored library or the proposed new library, with the exception of two small wheelchair lifts like the ones in City Hall and the Main Library. The criticism of the historic library’s access is a “straw dog” directed at destroying the building. ...

“It is obvious that the demolition / new construction option favored by the DEIR will be two or three times the cost of the restoration plan and put various parts of the site out of commission for long periods of time. The estimator has reviewed the volunteer consultants’ comments and factored in the extra costs and delays of public works projects and warns that in a time of funding shortages it is unwise to spend City & County of San Francisco funds on this expensive and slow moving project. ...

“The floor plan of the new triangular library is deficient in providing for computers, is not expandable, and loses critical space to elevators, circulation, entrances, bathrooms and stairs. The triangular configuration is unfriendly to readers, and the hundred foot sound wall on Columbus Avenue will be distracting and a possible source of noise. The upper floor has nothing to do with library functions at all and repeats a meeting room function found in the swimming pool building club house, the Telegraph neighborhood center across the street, the nearby schools and churches, and the Italian American Athletic Club. The second floor of the proposed new library is unnecessary.” (*Zach Stewart, Letter, October 2, 1010*)

Response PD-6

The commenters state objections with the proposed project and question the project sponsors’ objectives. Commenters state that the condition of the existing North Beach Branch Library does not justify its proposed demolition, that the proposed library would not meet project sponsor objectives, and that the description of how the project would meet objectives is biased in favor of the project.

The project sponsor objectives are listed in the DEIR on pp. 29–30. These objectives include, in summary, expanding the library to provide enough space for additional elements, ensuring that the library meets codes for seismic safety and Americans with Disabilities Act requirements,

increasing the civic presence and visibility of the library from Columbus Avenue, and enhancing connectivity between park amenities.

The existing structural conditions of the library are presented in the DEIR on pp. 25–27. As stated there, the existing building could be subject to major damage during a seismic event. The library’s survival through the Loma Prieta earthquake in 1989 does not change this assessment, which is based upon studies conducted after the seismic event.

Comments regarding the cost of heating and cooling of “wasted air space” as well as comments regarding the cost-effectiveness of the proposed project in general, are noted. Cost-effectiveness is beyond the scope of CEQA but will be considered by decision-makers in their evaluation of the project. As stated in the DEIR on p. 40, the proposed library would be designed to attain LEED Silver accreditation pursuant to the City and County of San Francisco Green Building Ordinance.

The need for additional building spaces and circulation areas has been identified in the Master Plan and evaluated in the DEIR proposed project and alternatives, and this need would have to be addressed as part of any other building scheme not yet identified. Please also see response to comment PD-3, on page 42, which discusses usable and assignable spaces in the proposed library.

In response to the comment that smaller windows on the eastern and western facades of the proposed library building would decrease safety, the proposed library does not include expansive glass elements on these facades because these windows would be blocked by bookshelves. Property owners and tenants throughout the city purposefully obscure ground-floor windows to provide for privacy. It would be speculative of the Lead Agency to conclude that limited ground-floor windows, or obscured windows in general (through the use of blinds, curtains, shutters, rolling shades, or other means) inherently decrease safety in any building, including at the library, to the point that police protection could not be provided. Impacts to police protection are discussed in the Initial Study (Appendix A of the DEIR) on page 59.

The commenters’ opinions regarding the programming for computers and the role of libraries in the community are noted. As stated in Table 2 on page 42, the proposed project would increase total computers to 19 from five. Similarly, comments regarding a theoretical future expansion of the proposed library are noted. These comments relate to the merits of the project, not the adequacy of the DEIR.

Regarding the existing restrooms located directly north of the children’s play area, these restrooms are small and have only one stall that is both in need of repair and not compliant with the Americans with Disabilities Act (ADA). This restroom is proposed to be demolished under the proposed project. As stated on DEIR page 3, as part of the proposed Master Plan, the children’s play area would be relocated to the center of the block closer to the pool and clubhouse building restrooms, which are both recently renovated and meet ADA requirements for access.

The DEIR does not state that the play area would move to the middle of the block solely to be closer to these restrooms. As stated on p. 45, the play area would be moved to the center of the block to be farther away from surrounding streets. This movement would help to meet the project sponsors’ objective to provide a “safer and more protected area for the children’s play area.”

Regarding the claim that the project sponsor objectives are biased in favor of the proposed project, please see response to comment AL-1, on page 153, which explains that the DEIR includes alternatives that meet most of the project sponsor objectives and avoid or reduce significant impacts to historical resources, as required by CEQA.

Comment PD-7: The heights of the existing and proposed library buildings are not accurately and consistently described.

“BUILDING HEIGHTS: In several tables and comparisons in the DEIR, the height of the existing library and the new triangle library are misrepresented. Along the Mason Street sidewalks, the highest point of the existing North Beach Library is 18’-0” —not 26’-0”. Also, the roof line slopes downward with the sloping site, and the average perceived height is about 14’-0” to 15’-0”. The proposed new Triangle Library is taller than 30’-0”, likely 35’-0”+ with fixed solar panels and mechanical penthouse.” (*Howard Wong, AIA, E-mail, October 12, 2010*)

“Further, the facade of the library is 17-18 feet on Columbus, whereas the EIR states its height at 26 feet, a measurement taken from the tennis courts.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

“The height comparisons between the existing and proposed library buildings and the methods used to measure them are inconsistent and inaccurate. The height comparisons shown on Table 2 (Page 42) between the existing and proposed project are not based on the same standard or point of measurement so the comparisons are inconsistent, inaccurate and biased.

“According to the DEIR on Page 34, the height of the existing library building is ‘*approximately 18 feet*’ at its west (front) elevation along Mason Street measured to the highest point at the peak of the roofline and ‘*approximately 25 feet*’ at the east (rear) elevation along the tennis courts measured to the highest point at the peak of the roofline.

“Our measurements agree that the height of the existing library is 18 feet to the peak of the roof as measured from the front of the building on Mason Street. Why does the DEIR incorrectly use the 25 ft rear height measurement on Table 2 (Page 42)? The chart must be corrected to show the height of the existing library as 18 feet instead of 25 feet.

“The DEIR uses a different method for measuring the height of the proposed new building. On page 37, the DEIR says that: ‘*the new library’s approximate height would be 30 feet measured at the midblock along Columbus Avenue.*’ Is Columbus Ave. or Mason Street the front of the new library? Is this to the very top of the highest rooftop feature? What points were used to measure from?

“For purposes of comparing the bulk of the proposed new building to the existing library, please provide the height of the proposed new building at each of its 3 points—measured at Lombard and Mason, at Lombard and Columbus, and at Columbus and Greenwich—measured to the top of the *highest* rooftop feature.

“The height of the existing library building is 18 feet at its west (front) elevation to the peak of its roof. The DEIR inaccurately states at different places throughout the document that its height is variously 25 ft,

25.5 feet or 26 feet. These intentional misstatements of fact must be corrected in all places in the DEIR to change the measurement to 18 feet. Please note the following correct the DEIR on the following pages:

- (a) Please correct the chart on page 34 to show the height of the existing conditions to be 18 feet instead of 25 feet and reflect a net change of 12 feet instead of 5 feet.
- (b) On page 99 in the DEIR's description of the visual character of Mason St., the DEIR incorrectly states that the existing library building is 25.5 feet on the Mason Street side. Please correct to show that the building is 18 feet as measured from its front façade on Mason Street.
- (c) On page 129, the DEIR inaccurately and with an obvious intent to distort the facts, uses a the height of the existing library from its rear (now seeming to increase its height at the rear to 26 feet) to compare it to the new building height so it can say that proposed library would be only 4 feet higher that the existing library. This obvious error must be corrected. The existing library is 18 feet tall, not 25 ft, 25.5 feet tall or 26 feet tall." (*Vedica Puri, Letter, October 12, 2010*)

Response PD-7

The comments request clarification regarding the heights of the existing and proposed library buildings.

The existing library measures +/- 18 feet from Mason Street to the peak of the roof eave on its western side. It measures +/- 25 feet from the tennis courts to the peak of the roof eave on its eastern side. The top of the chimney from Mason Street is +/- 21.5 feet. The top of the chimney from the tennis courts is +/- 28.5 feet. The DEIR incorrectly stated that the height along Mason Street is 25 or 26 feet.

The project is currently in the design phase. Exact measurements would be calculated when construction drawings are prepared. The proposed library would be +/- 24 feet tall at the corner of Lombard Street and Mason Street, +/- 24.5 feet tall at the corner of Mason Street and Columbus Avenue, and +/- 27.5 feet tall at Columbus Avenue and Lombard Street. The top of the skylight in the middle of the roof would be +/- 30 feet tall. The roof would be built to accommodate solar panels in the future, but solar panels are proposed as an additional option. Planning Code rules for height measurement do not include highest feature of building; for example, various rooftop projections are excluded from the Code definition of height in Section 260(b).

To clarify building heights, the following revisions are made to the DEIR text (new text is shown double-underlined; deleted text is shown in ~~striketrough~~):

On page 99, the seventh sentence of the first full paragraph is revised as follows:

Also, the red brick of the existing ~~25.5~~18-foot library building contrasts with the surrounding beige and pastel buildings.

On page 129, the first sentence of the first full paragraph is revised as follows:

The proposed library, at 2 stories, ranges between + / - 24 feet and 27.5 feet at the eave line. The existing library ranges from 18 feet at Mason Street to 25 feet at the east side measured from the tennis courts. ~~and approximately 30 feet in height, would be 4 feet taller than the existing library.~~

On page 234, the second paragraph is revised as follows:

In terms of land use, this alternative would convert the existing commercial surface parking lot on the parcel to a library (public) use. It would, like the project, result in the elimination of up to 20 parking spaces currently on the site once the library is constructed. The library would be 40 feet tall, which would be ~~10 feet~~ about 12 feet taller than the proposed project and ~~14 feet~~ about 22 feet taller than the Mason Street façade of the existing branch building at 2000 Mason Street. This alternative, similar to the branch proposed in the Master Plan, would comply with the parcel's existing height limit of 40-X. Like the proposed project this alternative would not physically divide an existing community, conflict with land use plans or policies, or disrupt or divide the neighborhood.

On page 235, the second full paragraph is revised as follows:

Wind effects associated with this alternative would be similar to the proposed Master Plan. While this alternative would be about ~~10~~ 22 feet taller than the existing library and taller than surrounding buildings, this height is not tall enough to create substantial increases in ground-level wind effects or to cause hazardous wind impacts. Similar to the proposed Master Plan, wind effects would be less than significant.

Comment PD-8: The Draft EIR does not adequately describe the North Beach Library Master Plan.

“The HPC believes that the DEIR is inadequate in describing the North Beach Library Master Plan goals, content, timing, and funding.” (*Charles Chase, Historic Preservation Commission, Letter, October 25, 2010*)

Response PD-8

The comment refers to the North Beach Master Plan goals, content, timing and funding. The comment does not provide specificity about how the DEIR's description of these items is inadequate. The Master Planning process is described on DEIR pp. 27–28.

Comment PD-9: The lack of maintenance of the existing library is not a valid reason to demolish the building.

“The SFPL's failure to maintain and repair the North Beach Library is no justification for demolition. The DEIR inappropriately describes the failure of the SFPL to maintain and repair the North Beach Library over the years as reasons to replace the building, such as ‘[t]he roof leaks and is in need of replacement. Also the heating system has passed its useful life expectancy and needs to be replaced. Floor, wall and ceiling finishes are outdated and in need of refurbishment throughout as is the lighting.’” (*Vedica Puri, Letter, October 12, 2010*)

Response PD-9

The comment regarding building maintenance is acknowledged. The full list of project sponsors' objectives is on pp. 29–30 of the DEIR. The merits of the project will be considered by the decision-makers as part of the approvals process.

Comment PD-10: Project Description does not describe why SFRPD seeks to increase the size of the children's play area and decrease hardscape area.

"The DEIR provides no basis for the SFRPD's decision to increase the size of the children's play area while reducing the size of the multipurpose hardscape area. The DEIR is inadequate and incomplete in that it does not contain the basis for Recreation & Parks Commission's decision (on September 18, 2008) to increase the size of the children's play area while reducing the size of the multipurpose hardscape area as proposed in the Master Plan's reconfiguration of the outdoor recreation facilities.

- (a) "Was an independent survey of park use conducted by SFRPD to determine the relative numbers of users of: (1) the multipurpose hardscape area, (2) the tennis courts, (3) the children's play area, and (4) the bocce courts?"
- (b) What were the results of this user survey?
- (c) If no survey of users was conducted, on what basis did the SFRPD and its Commission make this decision?" ...

"The DEIR Provides No Basis or Justification for the SFRPD's Decision to Increase the Size of the Children's Play Area While Reducing the Size of the Multipurpose Hardscape.

"No User Survey Conducted: The DEIR is inadequate and incomplete in that it does not contain any factual basis for Recreation & Parks Commission's decision (on September 18, 2008) to increase the size of the children's play area while reducing the size of the multipurpose hardscape as proposed in the Master Plan's reconfiguration of the outdoor recreation facilities. As we commented above, the results of an independent survey of park use should be include in the DEIR analysis showing the relative numbers of users of the multipurpose hardscape area vs. the children's play area.

"Impacts Related to Moving the Children's Playground Not Considered: The proposed 'Master Plan' appears to be focused on a single goal: moving the children's playground from its current location to an area below between the tennis courts and the swimming pool. Although a worthy idea in concept, accomplishing this goal would require SFRPD to make a financial commitment of at least 5 Million by its own estimates⁸ and would, according to the DEIR, result in the following impacts:

1. Energy consumption and cost of a massive excavation of between 1,000 and 1,375 cubic yards of soil removal,
2. Moving all three of the existing tennis courts at least 40 feet to the east into the existing multipurpose hardscape area, which would, in turn,

⁸ "SFRPD applied for a \$5 million grant from the Statewide Park Development and Community Revitalization Program for the "Joe DiMaggio North Beach Playground" project. The project application described the demolition of the historic library as if *fait accompli*" (*Vedica Puri, Letter, October 12, 2010*).

3. Reducing the sq footage of the multipurpose hardscape area by at least 12,000 sq ft eliminating the regulation size softball diamond,
4. Moving and rebuilding the two bocce ball courts,
5. Removing 3 mature Indian Laurel Figs on the triangle parcel, 2 Cherry trees on Mason St. sidewalk, 2 strawberry trees on the Columbus Ave sidewalk, as well as 11 sycamore trees, three Brisbane Box trees, and two planting beds within the children's play area (page 45), with related impacts on nesting birds,
6. Demolishing a historic building,
7. Constructing a building on the parcel of land condemned for "open space," igniting community controversy,
8. Building into a public street in conflict with the General Plan policies, and
9. Forever foreclosing the possibility of creating almost 1/3 acre of contiguous green open space similar to Washington Square by combining the condemned triangle parcel with Mason Street.

"Please address how the benefit of moving the children's playground as proposed by the Master Plan would outweigh the impacts listed above, and consider at least one Master Plan alternative that would accomplish most or all of the five Project Objectives listed above in relation to SFRPD's facilities that would retain the children's play area in its current location." (*Vedica Puri, Letter, October 12, 2010*)

Response PD-10

The commenter refers to the size of the children's play area and requests justification for the proposed increase in size of the area.

The Master Planning process included a series of public meetings, discussions with park users and review of the existing conditions. Many parents and families asked for a children's playground that would be both located away from the street and serve all ages of children. In order to continue to provide areas for both small and school-age children (which the current playground does), and meet the new safety standards that require considerably larger and more space than the existing playground, the playground area size is proposed to increase. Despite this increase, through the Master Planning process the community expressed a desire to retain all of the basic functions of the park. Therefore, the requirement to increase the size of the children's play area to meet new safety standards, as well as the desire to maintain all of the existing park program elements, were incorporated into the Master Plan.

The commenter also requests that the DEIR provide justification as to how moving the children's play area to meet the goals described in the previous paragraph can be balanced with the less-than-significant, and significant, environmental impacts of the proposed project. The commenter then requests an alternative be evaluated for reducing impacts to the multipurpose hardscape area.

Project decision-makers will consider project components and environmental impacts during their decision on project approval. The environmental impacts of each item presented by the commenter are discussed below:

- The energy impacts of the proposed project, including excavation of the children's play area, are discussed in the Initial Study (Appendix A of the DEIR), page 78. Impacts would be less than significant. Please see response to comment PD-11, which clarifies the amount of soil that would be excavated from the children's play area. About 3,000 cubic yards of soil would be removed. As stated in the Initial Study, pursuant to San Francisco Ordinance No. 27-06, a minimum of 65 percent of material generated from demolition and construction must be diverted from landfills. The cost of soil removal is beyond the scope of CEQA.
- The relocation of the existing tennis courts and the relocation of western wall of the multi-purpose hardscape area are described in the DEIR Project Description on p. 45. The impacts to recreation are discussed on pp. 92–93. The impact to recreation was determined to be less than significant. Please also see response to comment RE-1, on page 84, which further discusses the softball diamond.
- Any impacts associated with reconstruction of the bocce courts are already included in the DEIR analysis. Also, each alternative selected for consideration would include similar impacts related to the bocce courts. The Preservation and Northerly Expansion Alternative, which was rejected from further consideration, would displace the courts.
- Impacts to biological resources, including street trees and nesting birds, are discussed in Appendix A of the DEIR on pp. 61–64. As stated there, impacts with incorporated mitigation measures would be less than significant. Please also see responses to comments BI-1 and BI-2 in this document, on pages 149 through 150, which reiterate these findings.
- Impacts to historic resources are presented in the DEIR on pp. 134–158. As stated there, the proposed project would result in significant and unavoidable impacts to historic architectural resources, associated with the demolition of the existing branch library building that is considered a historical resource for purposes of CEQA.
- Regarding construction of the proposed library on “open space,” please see response to comment PD-1, on page 35, which states that the 701 Lombard Street parcel is considered to be a surface parking lot under CEQA because that was (and still is) its physical environmental condition at the time of the publication of the EIR Notice of Preparation.
- Regarding potential conflicts with the *General Plan* related to the proposed library's footprint, which would extend 19.5 feet into the existing Mason Street right-of-way, please see DEIR Appendix B, which includes a list of policies with the proposed project would potentially conflict. Please see Urban Design Element policies 2.8 through 2.10, on Appendix B pp. 6 and 7.

The commenter's statement that the development would “foreclose the possibility of creating 1/3 acre of contiguous open space” ignores that the proposed project would create an additional 12,010 sf (more than 1/4 acre) of open space. As stated in DEIR pp. 90–97, the proposed project would result in less-than-significant impacts to recreation. The DEIR Alternatives analyses, presented in Chapter 6, also provide comparisons of recreational open space that would be developed under each alternative, as compared to the proposed project. Under every alternative, impacts to recreation would be less than significant.

Therefore, the commenter may disagree with the merits of the proposed project for its treatment of the multipurpose hardscape area, but an alternative is not required by CEQA because the analysis did not find that the project would result in significant impacts to recreation, judged by the following criteria:

- (a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?
- (b) Would the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?
- (c) Would the project physically degrade existing recreational resources?

The statement that SFRPD's application for a \$5 million dollar grant described demolition of the existing library as *fait accompli* is noted. The grant application for park renovation is not the CEQA document for the proposed project, although the application does state that the environmental review for CEQA purposes is ongoing. Regardless of the grant application, the proposed project must be analyzed pursuant to CEQA, and decision makers must make environmental findings, then weigh that analysis with other project benefits and components.

The EIR does not assume that demolition of the building is *fait accompli*, but instead analyzes that as a physical consequence of the project and in some cases of some project alternatives, as well.

Comment PD-11: The EIR contains inconsistencies regarding total volume of soils to be excavated from the project site.

"The EIR contains inconsistent information as to the amount of subsurface soils to be removed to excavate the children's play area as proposed in the Master Plan. According to the DEIR on Page 45, the excavation of the existing 9,900 sq ft children's play area down to the level with the tennis courts would require the removal of approximately 1,000 cubic yards of subsurface soils, assuming the excavation to an average depth of 8 feet. However, on page 34, the DEIR states that this depth would be 11 feet.

- (a) What is the actual grade level between the children's play area and the tennis courts? Is it 11 feet (as stated on page 34 in the 1st paragraph) or 8 feet (as stated on page 45)?
- (b) If the difference in grade were 11 feet instead of 8 feet, how many additional cubic yards of subsurface soils would have to be removed? 38% more?
- (c) How much energy would be consumed for this soil removal?" (*Vedica Puri, Telegraph Hill Dwellers, Letter, October 12, 2010*)

Response PD-11

The comment questions the total amount of soils to be removed through excavation of the children's play area.

The children's play area is about 9,900 square feet, and it would be excavated to an average depth of 8 feet, resulting in removal of about 3,000 cubic yards of soil. The DEIR incorrectly stated that the volume would be about 1,000 cubic yards. To correct the amount of excavation required, the fourth sentence of the first full paragraph on DEIR p. 45 is revised as follows (new text is double-underlined; deleted text is shown in ~~strikethrough~~):

During this phase, the existing children's play area in the southwestern portion of the block would be removed, and the approximately 9,900 square feet of area would be excavated to an average depth of 8 feet, resulting in approximately 3,000 ~~1,000~~ cubic yards of subsurface soils removal.

Additionally, the second sentence of the first full paragraph on DEIR p. 49 is revised as follows (new text is double-underlined; deleted text is shown in ~~strikethrough~~):

Depending on funding for Phase 2 of the project, the construction period of Phase 2 would last approximately 10 months, beginning with the closure of the existing tennis courts, multi-purpose hardscape area, and children's play area, excavation of approximately 3,000 ~~1,000~~ cubic yards of soil to an average depth of 8 feet in early 2013, a 10-month construction period, and ending by 2014.

Finally, the second sentence of the last full paragraph on DEIR p. 151 is revised as follows (new text is double-underlined; deleted text is shown in ~~strikethrough~~):

Similarly, during Phase 2 of the proposed project, the existing children's play area would be excavated to an average depth of 8 feet and result in removal of approximately ~~1,000~~ 3,000 cubic yards of material.

The DEIR on page 11 states that there is an about 11-foot grade difference between the children's play area and the multipurpose hardscape area. This is incorrect. There is an approximately 3-foot grade difference between Greenwich Street and the children's play area. There is an approximately 8-foot difference between the children's play area and the multi-purpose hardscape area. In total, there is an approximately 11-foot grade difference between Greenwich Street and the multipurpose hardscape area at eastern edge of the children's play area.

The following revisions are made to the document to clarify the grade differences between park features and Greenwich Street (new text is double-underlined; deleted text is shown in ~~strikethrough~~).

On page 34, the end of the first full paragraph is revised as follows:

The dimensions of these facilities are discussed in Section 4.A. Land Use and Recreation. The hardscape area and tennis courts are level with Lombard Street, and the northern entrance to the playground is located along Lombard Street. The southern entrance to the playground is located at Greenwich Street, 11 feet above the multipurpose hardscape area, and the children's play area is 3 feet below level with Greenwich Street but 8 feet above the multipurpose hardscape area; ~~the difference in grade between the two levels is approximately 11 feet.~~

On page 76, the second sentence of the third full paragraph is revised as follows:

For example, the hardscape area and tennis courts are at an elevation of 25.5 feet above mean sea level (asl), which is ~~41-8~~ feet lower and on a separate level from the children's play area.

On page 178, the first and third sentences of the second paragraph is revised as follows:

The topography of the project site and vicinity slopes downward from ~~39~~ 36.5 feet above sea level (asl) in the south (at Greenwich Street) to 18 feet above sea level (asl) in the northwest (at Lombard Street and Columbus Avenue). Due to this grade, elements of the Joe DiMaggio Playground are at different elevations. The existing children's play area is at ~~36.5~~ 33.5 feet asl, and the tennis courts and multipurpose hardscape area are at 25.5 feet asl.

Also, Figure 3, DEIR p. 33, and Figure 47, DEIR p. 218, are revised (revised figures presented on p. C&R-199 and p. C&R-207, respectively).

As stated in the Initial Study (Appendix A of the DEIR), the energy involved in excavation would not be expected to result in a significant impact to energy utilities or to greenhouse gas emissions. The proposed excavation of approximately 3,000 cubic yards is not large by the standards of major development projects in San Francisco; for example, a not-uncommon two-level basement excavated beneath a commercial building on a 20,000-square-foot (140 feet by 140 feet) site would necessitate about three times as much excavation as would the proposed project. A rough estimate of the energy consumption for the playground excavation indicates the total energy use for excavators and haul trucks would be less than 5 percent of one day's energy use for vehicle travel in San Francisco.⁹

Comment PD-12: The EIR does not adequately describe the location of utility distribution lines in the Mason Street right-of-way.

"The DEIR is inadequate and incomplete in that it does not show the location of the major public utilities. The DEIR states that major public utilities, including a water main, gas line and sewer pipeline are located 'within the project area's portion of Mason Street.' (Pg 36)

- (a) Please show on a site map exactly where these major public utilities are located in relation to the proposed new Library on the triangle parcel.
- (b) Would the construction of the proposed new triangle library require any of these utilities to be moved?
- (c) How do these public utilities impact the location of the proposed new library building or the use of Mason Street open space for recreational purposes?" (*Vedica Puri, Letter, October 12, 2010*)

Response PD-12

The comment refers to existing utilities and potential impacts of the proposed project on those utilities. Existing utilities are described on p. 36 of the DEIR as follows:

⁹ Assumes one month of excavation, 20 gal./hr. diesel fuel consumption for one excavator operating 8 hours, 15 gal./hr. diesel consumption for 17 daily trucks, each making a two-hour round trip, and 8.5 million daily vehicle-miles-traveled in the City.

“Existing utilities are located underground within the project area’s portion of the Mason Street right-of-way and include an 8-inch diameter San Francisco Public Utilities Commission (SFPUC) water main, an 8-inch diameter Pacific Gas and Electric (PG&E) gas line, and a 3-foot-by-5-foot brick sewer that connects via junction box to a 33-inch diameter vitrified clay pipe sewer at Columbus Avenue. On the Surface, PG&E electrical poles are located along Mason Street’s western sidewalk.”

Providing a narrative description instead of a graphic does not render the DEIR insufficient.

Consistent with the text description in the DEIR, **Figure C&R-1** has been included to show the location of these utilities in relation to the eastern façade of the proposed library. The location of these underground utilities precludes excavation of Mason Street to equalize the slope of the street grade, thereby creating challenges to relocate potentially displaced recreational uses from other portions on the site. Nonetheless, the design team, Department of Public Works (DPW), and local utility representatives held several meetings to discuss the proposed new building and agreed on a sufficient distance for the new building in order to maintain the existing utilities under both construction and operations of the proposed library. Also, given that the proposed library would meet current standards for seismic safety, a seismic event would not be likely to affect the proposed library to the extent that resulting damage to the library would affect utilities in Mason Street.

Impacts to utilities and service systems are discussed in the Initial Study (Appendix A of the DEIR) pp. 54–58 of the DEIR.

Comment PD-13: Project Description contains inaccurate description of North Beach NCD uses and their square footage limits.

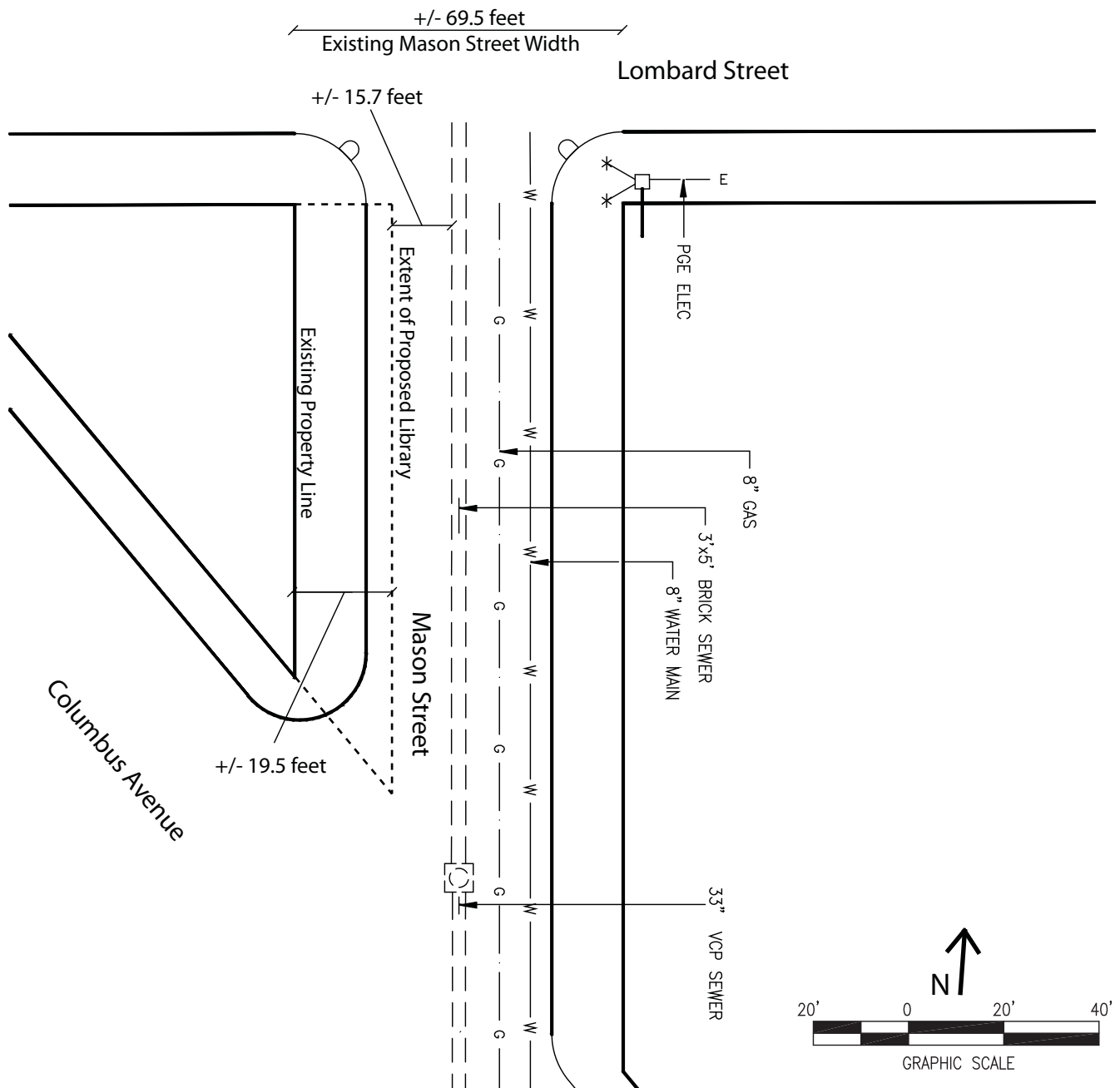
“Correct the inaccurate statement that uses in the North Beach NCD are ‘typically 4,000 square feet or less’ (Page 34) and include an accurate description of the North Beach NCD use size limitation. A use size up to 1,999 sq ft is permitted, a use size between 2,000 and 3,999 requires a Conditional Use, and any use size of 4,000 square feet or above is prohibited in the North Beach NCD. Please include the fact that the proposed new library on the triangle parcel is 8,500 square feet and would, therefore, be inconsistent with the use size limitations in the North Beach NCD. ...

“Page 56 (4th Paragraph)—In the last line it states that: “the proposed library would be permitted in the North Beach NCC with Conditional Use Authorization.” This is not an accurate statement. Any use size of 4,000 square feet or above is prohibited in the North Beach NCD. The proposed library exceeds this limit. Please correct this error.

“Page 52 (last Paragraph)—States that restaurants are conditionally permitted uses on the second floors. This is not a correct statement. Restaurant use above the ground floor is prohibited in the North Beach NCD. Please correct this error. (*Vedica Puri, Letter, October 12, 2010*)

Response PD-13

The commenter refers to the permitted size of uses in the North Beach Neighborhood Commercial District. The commenter is correct that uses larger than 4,000 square feet are not



Notes:
 Image is for planning purposes and not a survey.
 Utilities not within the Mason Street portion of the project site are not shown.

permitted. Therefore, the proposed project would require the 701 Lombard Street parcel to be zoned to a Public (P) Use District to allow for construction of the proposed 8,500-square foot library. Please see Section D., Draft EIR Revisions, for edits to the EIR to remove the potential for a Conditional Use authorization as a required approval for the proposed project.

To correct the DEIR text, on pages 3 and 49, in the Project Approvals section, the third bullet under “Planning Commission” is deleted as follows to remove reference to a potential Conditional Use authorization (deleted text shown in ~~strikethrough~~):

Planning Commission

- ~~• Conditional Use authorization for a library (public use) in the North Beach Neighborhood Commercial District (Planning Code Section 723.83), to allow the library use in the event that rezoning to P (Public) Use District is not approved.~~

Additionally, the paragraph at the top of DEIR p. 34 is revised as follows to accurately describe use controls of the North Beach Neighborhood Commercial District (NCD) (new text is double-underlined; deleted text is shown in ~~strikethrough~~):

The North Beach NCD allows a variety of ~~neighborhood-serving~~ uses, typically less than 4,000 square feet ~~or less~~ in floor area. A use size up to 1,999 square feet is permitted, a use size between 2,000 and 3,999 square feet requires a Conditional Use Permit. Uses above 3,999 square feet are not permitted. The 40-X Height and Bulk District allows buildings up to 40 feet tall, with no bulk requirements. For a detailed discussion of existing zoning districts, see Chapter 3, Plans and Policies.

On page 56, the fourth paragraph is revised as follows to accurately describe the proposed library’s compliance with the existing North Beach NCD (deleted text is shown in ~~strikethrough~~):

The proposed library is a principally permitted use in P Districts (Planning Code Sec. 234.1), as would be the adjacent public uses on the vacated portion of Mason Street and the playground. ~~If a rezoning of the 701 Lombard Street to a P district were not granted, the proposed library would be permitted in the North Beach NCD with Conditional Use authorization. The proposed library would not be a permitted use at its proposed size without a rezoning.~~

On page 57, the summary paragraph in the middle of the page is revised as follows to accurately state that the proposed project would require a rezoning to a P District (deleted text is shown in ~~strikethrough~~):

The Zoning Map amendment is part of the proposed project. The proposed project would comply with the requirements of the P Use District and the 40-X and OS Height and Bulk Districts. ~~If rezoning were not approved, the project would require Conditional Use authorization, the issuance of which would be subject to Section 303 of the Planning Code to permit a library in the North Beach NCD.~~ The project does not propose off-street parking, nor would any off-street parking be required. The project would be required to provide two Class I bicycle spaces and seven Class II spaces, which would be provided for onsite. The project would not obviously conflict with the Planning Code.

On page 78, the entire second full paragraph in the middle of the page is removed as follows to accurately state that the proposed project would require a rezoning to a P District (deleted text is shown in ~~strikethrough~~):

~~If 701 Lombard Street is not rezoned to a P Use District, it would remain within the North Beach NCD. The portion of the vacated Mason Street right of way that would be within the footprint of the proposed library would also be zoned to NCD, thereby slightly expanding the area in which permitted or conditionally authorized uses of the North Beach NCD could be built. A Conditional Use authorization would be required to allow the library (a public use) to be located in the NCD, pursuant to Planning Code Sec. 723.83. If the Planning Commission finds the proposed Master Plan necessary and desirable, this Conditional Use Authorization would permit the expansion of the public and civic uses of the existing Joe DiMaggio Playground westward to Columbus Avenue, although it would not preclude future development with non-public uses. It would not result in adverse physical effects and would not divide an established community.~~

Footnote 107 on DEIR p. 174 is revised as follows to eliminate discussion of a potential Conditional Use Authorization (deleted text is shown in ~~strikethrough~~):

~~Planning Code Section 234.1 states that P Districts do not have parking requirements for libraries. Because the library site is being re-zoned from the North Beach Neighborhood Commercial District (NCD), the parking requirements of that nearby district were examined. For the North Beach NCD, pursuant to Planning Code Section 722.22, institutional uses are not required to provide parking if the "occupied floor area" is less than 5,000 square feet. Although the new library will be 8,500 square feet, the library and architect have determined that 3,750 square feet of the new building would be unassignable floor area, and therefore the "occupied floor area," as defined in Planning Code Section 102.10, would be less than 5,000 square feet. Therefore, no off-street vehicular parking would be required by the North Beach NCD, should the Planning Commission approve the project with Conditional use authorization and not rezone the 701 Lombard Street project site.~~

Finally, on page 234, the first paragraph is revised as follows to accurately state that the Three-Story Library (701 Lombard Parcel) Alternative would require a rezoning to a P District (deleted text is shown in ~~strikethrough~~):

~~The 701 Lombard Street parcel would be rezoned to a P, (Public) use district where a library would be a principally permitted use, as described in Section 4.A, Land Use and Recreation, in this EIR. Alternatively, the site could retain its existing North Beach NCD use district. In that case, a library within this lot configuration and height would be permitted with Conditional Use authorization. (Planning Code Section 722.82 conditionally permits public uses up to three stories within the North Beach Commercial Use District.)~~

These revisions do not change the findings of the EIR that the project would have less-than-significant impacts related to land use compatibility because the proposed Master Plan would not disrupt or divide the neighborhood or have an adverse effect on the character of the vicinity.

The comment also states that restaurants are not conditionally permitted uses on the second floor. According to Planning Code Section 722.42, full-service restaurants are conditionally permitted uses on the second floor within the North Beach NCD. However, the North Beach Special Use District (Section 780.3), which is coextensive with the North Beach NCD, permits full-service

restaurants, small self-service restaurants, and bars “on the ground level” if they do not displace certain neighborhood-serving retail uses. The North Beach Special Use District controls, however, do not address the permissibility of restaurants on the second floor. Regardless, the proposed project would result in less than significant land use impacts, and there are no restaurant uses proposed as part of the project.

Comment PD-14: Project Description contains inaccurate description of North Beach Clubhouse hours and Pool and Clubhouse staffing levels.

“Correct the information on Page 35 to reflect current information on clubhouse hours to indicate that as of the date of the Planning Commission hearing and the due date for comments on the DEIR, the clubhouse is closed at all times due to budget and staff cuts by SFRPD. Also, update the pool and clubhouse staffing numbers on page 36 (2nd Paragraph) to reflect the currently reduced staff levels.”
(Vedica Puri, Letter, October 12, 2010)

Response PD-14

The comment refers to the operating hours of the North Beach Pool and Clubhouse. The operating hours listed on page 35 of the DEIR were the applicable operating hours at the time of DEIR publication (August 2010). It is beyond the ability of the Lead Agency to predict future hours based on as-yet-unimplemented budget cuts (or surpluses). The information was therefore correct at the time of publication. To present current conditions, the following revisions are made to DEIR p. 35 to reflect changes to operational hours since publication of the Draft EIR (new text is double-underlined; deleted text is shown in ~~strikethrough~~):

~~As of August 2010, the pool is open on the following schedule:~~

| | | |
|----------------------|-----------------------|----------------------|
| Monday | 6:15 a.m. | 2:30 p.m. |
| Tuesday | 6:15 a.m. | 6:50 p.m. |
| Wednesday | 9:50 a.m. | 5:30 p.m. |
| Thursday | 6:15 a.m. | 6:50 p.m. |
| Friday | 10:00 a.m. | 7:00 p.m. |
| Saturday | 8:15 a.m. | 4:30 p.m. |
| Sunday | 10:00 a.m. | 3:00 p.m. |

~~As of August 2010, the clubhouse is open from 2:30 p.m. to 6:30 p.m. Monday through Friday, when it is used primarily for recreational purposes during the after-school hours. The space also can be programmed, although it is usually set up for table tennis. It is closed to recreational activities on Sundays. The space is also rentable in the evenings by permit for a fee. No existing usage counts of the clubhouse are available.~~

The pool’s current hours are currently listed on SFRPD’s website:

| | | |
|------------------|-------------------|--------------------|
| <u>Tuesday</u> | <u>10:00 a.m.</u> | <u>– 7:00 p.m.</u> |
| <u>Wednesday</u> | <u>6:30 a.m.</u> | <u>– 5:30 p.m.</u> |
| <u>Thursday</u> | <u>10:00 a.m.</u> | <u>– 7:00 p.m.</u> |
| <u>Friday</u> | <u>6:30 a.m.</u> | <u>– 7:15 p.m.</u> |
| <u>Saturday</u> | <u>8:15 a.m.</u> | <u>– 4:30 p.m.</u> |

The clubhouse is not currently staffed by SFRPD. SFPL holds programs in the clubhouse on Thursdays from 10:15 a.m. to 12:15 a.m., one Saturday per month from 2:00 p.m. to 5:00 p.m., and one Tuesday evening event per month beginning at about 7:00 p.m. SFRPD is considering possible programs or partnerships to keep the clubhouse open for longer hours.

Additionally, in the first full paragraph of DEIR p. 36, the text has been edited is revised as follows to reflect changes in pool and clubhouse staffing since publication of the DEIR (new text is double-underlined; deleted text is shown in ~~strikethrough~~):

The library currently has an average visitor population of 97 people per hour and has a staff 12, with no more than six staff members working at any one time. The ~~clubhouse and pool combined~~ employs four-and-a-half full-time-equivalent staffers, ~~comprising one part-time clubhouse staff person and one full-time and two to three part-time pool house staff people, as needed.~~ The clubhouse does not currently have separate staffing.

As noted, the clubhouse is not currently staffed by SFRPD. SFPL holds programs in the clubhouse on Thursdays from 10:15 a.m. to 12:15 a.m., one Saturday per month from 2:00 p.m. to 5:00 p.m., and one Tuesday evening event per month beginning at about 7:00 p.m. SFRPD is considering possible programs or partnerships to keep the clubhouse open for longer hours. Please see Section D of this document, which includes edits to DEIR p. 35 and 36 to update the text to reflect the pool and clubhouse's use and staffing.

Regarding restroom hours, there are restrooms attached to the clubhouse and one restroom in the playground area. These restrooms can be opened with or without the clubhouse open. Both restrooms (upper and lower) are open Monday – Friday, 6:30 a.m. – 5:00 p.m. During the winter, the restrooms may close one hour early. In addition, SFRPD tries, when possible, to keep the restrooms open on weekends and holidays.

Comment PD-15: The Project Description does not accurately describe the project objectives or the justification for proposing the project.

“This person [whom I consulted] specializes in helping government agency project advocates (for example, from the Public Library, RecPark or Planning Department) when they get tangled up in their project plans, such as this library demolish/build project. Her comments are: ‘*Why destroy three tennis courts and build them new when you gain no tennis courts? Why destroy a children’s playground and build a new one when you gain no playgrounds? And why destroy an existing building and build a new one when you gain no buildings?*’ She also mentioned the futility of building a second story on the proposed new building to accommodate a tiny meeting room when there are several meeting rooms available to the public in North Beach (three within two hundred yards of the new building—see previously submitted letter of 10/2/10).” (*Zack Stewart, Letter, October 9, 2010*)

Response PD-15

Comments question the rationale for demolition and relocation of the existing children’s play area and tennis courts.

The project sponsors' objectives are listed on DEIR pp. 29–30. One objective is to “provide a safer and more protected area for the children’s play area.” As stated in response to comment RE-2, on page 87, the relocated children’s play area would be about 13,769 square feet under conceptual plans, which is about 3,880 square feet larger than the existing playground. Also, given the project sponsor’s objective to maintain all currently existing park program elements, the children’s play area cannot be relocated to the center of the playground without relocation of the tennis courts. Therefore, the tennis courts would move.

The proposed project, as analyzed under CEQA, would result in a net gain in recreational open space of 12,010 square feet.

Comment PD-16: The Project Description is accurate in its description of the library as an inaccessible facility, and that the new library would meet the objective of improving accessibility.

“As Deputy Director for Physical Access at the Mayor’s Office on Disability (MOD), I have reviewed the Draft Environmental Impact Report (EIR) for the North Beach Public Library and the Joe DiMaggio Playground Master Plan. I believe the Draft EIR is accurate and complete, and am writing to encourage your acceptance of the EIR.

“My primary responsibility in my role at the Mayor’s Office on Disability is to oversee the implementation of the City’s ADA Transition Plan and Uniform Physical Access Strategy (UPhAS), which ensures full access to people with disabilities to the City’s programs, activities, benefits and facilities. The Board of Supervisors adopted this ADA Transition Plan & UPhAS in May 2007. The North Beach library is a key part of the City’s ADA Transition Plan and Uniform Physical Access Strategy (UPhAS). We count on the library’s bond program to deliver full accessibility throughout the City’s branch libraries.

“The EIR is accurate in describing the current facility as inaccessible—that is, its programs and general services are not fully accessible to individuals with mobility disabilities. The building currently has four floor levels, with different types of programming on each level. Only one level is accessible through a side entrance, rather than through the main entrance. The upper level contains a portion of the children’s and Chinese language library and the lowest level contains the news print library and toilet facilities. These are not wheelchair accessible. Because the main, accessible level has no assembly space, and because all programs must be accessible to everyone, poetry readings and unique programs offered at North Beach have had to relocate to other locations. The current building also has poor access to rest rooms. Individuals with mobility disabilities must leave the building and travel around the perimeter of the block to use toilets at the North Beach Pool and Clubhouse.

“The EIR is also accurate in reflecting the extensive public review and input process. The San Francisco Library has made multiple presentations at the Mayor’s Disability Council (MDC) and at its Physical Access Committee meetings. The MDC has representatives from the disability community, who are appointed by the Mayor to advise the City. These meetings function as a primary venue for an agency or department to engage individuals with disabilities and individuals who represent organizations that service constituents with disabilities.

“The EIR is accurate because it shows how much better a new library would be for this particular site and for the Library’s system as a whole. As noted within the EIR, the library’s design incorporates Universal Design,

- The design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design.
- A user-friendly approach to design in the living environment where people of any culture, age, size, weight, race, gender and ability can experience an environment that promotes their health, safety and welfare today and in the future.

“The EIR is accurate in highlighting the importance of accessibility within the primary design being evaluated, and in part, in the report’s preservation alternates.

“The EIR is adequate because it analyzed many detailed preservation alternatives that show renovating and laterally expanding the current library may not provide adequate ADA parity. Many of the preservation alternates are split-level facilities that have elevators with multiple, confusing door openings, or are alternates that would require multiple elevators. Several alternatives have elongated floor plates, connected by a zig-zagging corridor that does not provide a direct line-of-sight for simplified wayfinding.

“These conditions do not meet the intent of first four principles of Universal Design:

1. Equitable Use
2. Flexibility in Use
3. Simple and Intuitive Use
4. Perceptual Information (‘legibility’ in the environment):

“The EIR is accurate in determining the proposed project does not appear to obviously conflict with the draft Better Streets Plan. MOD and the Mayor’s Disability Council have worked closely with the Planning Department to incorporate Universal Design into the Better Streets Plan, especially as a benefit to provide access to the City’s public buildings and cultural life.” (*John Paul Scott, AIA, CASp, Deputy Director of Physical Access, Mayor’s Office on Disability, E-mail, October 5, 2010*)

“As Co Chair of the San Francisco Mayor’s Disability Council and a member of our Physical Access Committee, I appreciate this opportunity to comment on the Draft Environmental Impact Report for the North Beach Public Library dated August 25, 2010. In committee we have heard from various individuals on this matter, as early as 2008 when both the Library and Recreation and Parks departments began their comprehensive study of most appropriate alternatives that would truly ‘entice people, both young and old, to want to use’ a public space made available to everyone.

“Most notably of interest to our committee in this DEIR were two of the project sponsors’ objectives, ‘to ensure that the library is safe and accessible, meeting Americans with Disabilities Act requirements,’ and to ‘ensure compliance with the Americans with Disabilities Act’ for the Joe DiMaggio/North Beach Playground.’ The San Francisco ADA Transition Plan adopted in June 2006, and expanded by the Board of Supervisors to include the City’s Uniform Physical Access Strategy, is included in Plans and Policies of this document. This proposal recognizes the current North Beach Public Library as a ‘City owned

inaccessible facility,’ acknowledging this proposed project as to ‘be designed to universal access standards.’

“It is for those reasons I join both the Mayor’s Office on Disability Deputy Director Mr. Scott and the Mayor’s Disability Council Physical Access Committee Chair, Mr. Chabner to most affirmatively urge you to certify this Draft Environmental Report for a neighborhood library and recreation area that will be accessible for all to enjoy into prosperity.” (*Jul Lynn Parsons, Co-Chair, San Francisco Mayor’s Disability Council, E-mail, October 12, 2010*)

“I urge the Planning Commission to certify it as a Final EIR so that the inadequate existing library can be torn down; a state-of-the-art, larger, brighter, warmer and fully disability accessible library can be built; and the existing playground can be expanded and integrated with the new library.

“I use an electric wheelchair, so disability access is especially important to me. I am Chair of the Physical Access Committee of the Mayor’s Disability Council. I mention this for identification purposes; the views expressed in this e-mail are my own and do not necessarily reflect those of the Committee or of other members....

“The report is accurate because it notes that the existing library is classified as inaccessible under San Francisco’s ADA Transition Plan. It accurately describes the building as not fully accessible to those with mobility disabilities, noting that only one level is accessible, the restrooms are inaccessible, and public programs/meetings are now being held off-site because there is no accessible meeting room.

“The DEIR is accurate because it shows that, for all of the preservation alternatives, making the existing library accessible to wheelchair users and those with other mobility disabilities as required by the Americans with Disabilities Act and California law: 1) would require a full elevator (with a large shaft) serving all levels of the building (except the primary entrance, for which this would be impossible; see below); 2) would result in the elevator protruding past the roof line; 3) would require the elevator to be located either in the interior of the library (which would decrease the usable space on each floor and negatively impact the openness of the building that is considered one of its character-defining features) or outside (which would negatively impact the external appearance of the building, probably including its character-defining features); and 4) would not be able to make the primary entrance accessible, so the entrance designed by Appleton & Wolfard as the primary entrance would remain permanently locked. The DEIR is accurate because it shows that an elevator and other required disability access features, such as larger restrooms, wider bookshelf aisles and greater turnaround space at the end of bookshelves, would reduce the usable size of an already small library....

“The document is accurate because it notes that the proposed project would be designed to universal access standards and therefore would not obviously conflict with San Francisco’s Uniform Physical Access Strategy. This means that, in comparison with all preservation alternatives, the proposed project would be better usable by everyone regardless of disability to the greatest extent of his or her own individual abilities—it would be equitable, flexible, simple and intuitive to use....

“The DEIR is adequate because it is complete, accurate, thorough and objective, and because it is the product of an open, professional and comprehensive process. I urge you to certify it so that the project can be evaluated on its merits, which are considerable. Library users, playground users, disabled people and

others have waited long enough for a functional, beautiful, spacious, modern and fully accessible library and playground.” (*Howard Chabner, E-mail, October 9, 2010*)

“The preservation approaches subordinate both the freedom of travel and the opportunity to access all the services and information a library branch can offer to be less important than the aesthetics of those who do not have a disability; an approach favoring preservation over access for people with disabilities might be a cause of litigation action—further delaying this project and further increasing costs.” (*Robert Planthold, E-mail, October 12, 2010*)

Response PD-16

Commenters generally express opinions regarding the merits of the proposed project related to improved accessibility. Comments are noted.

As stated on DEIR p. 29, one of the project sponsors’ objectives is to “ensure that the library is safe and accessible, meeting Americans with Disabilities Act requirements and current San Francisco Building Code requirements for seismic safety.”

Comments regarding the accessibility of the alternatives selected for consideration are noted. As stated on DEIR p. 219, the Preservation and Rehabilitation Alternative would result in a renovated library that would meet ADA accessibility requirements. As stated on DEIR p. 224, the Preservation and Southerly Expansion Alternative would result in the construction of an ADA-compliant facility. As stated on p. 232, the Three-Story Library Alternative would also meet the objective of providing a new ADA-accessible structure.

Comment PD-17: The Project Description fails to state that the proposed library will encroach 19.5 feet into Mason Street.

“Ignores fact that Triangle site is so small that project requires encroachment onto nearly 20 feet of Mason Street” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

Response PD-17

The comment states that the DEIR ignores the fact that the proposed library would encroach into the existing Mason Street right-of-way.

Contrary to the comment, the DEIR specifically states that the proposed library would extend 19.5 feet into the Mason Street right-of-way on pp. 2, 37, 42, 79, 80, 113, 204, 227, and 230. Figure 12, on p. 79, graphically shows the 19.5 feet of encroachment. The impacts of this project component are analyzed throughout the DEIR.

Land Use

Comment LU-1: The EIR does not accurately describe the importance of Columbus Avenue as a commercial corridor.

“Also in its description of the Physical Setting, the importance of Columbus Avenue as a commercial corridor should be added from the General Plan. The Commerce and Industry *Element Objective 6, Policy 7, provides that: ‘Continuous commercial frontage at the street level is especially important...It prevents the fragmentation and isolation of fringe areas, improves pedestrian accessibility, and enhances the physical and aesthetic cohesiveness of the district.’*” (Vedica Puri, Letter, October 12, 2010)

Response LU-1

The comment refers to the commercial land use character of Columbus Avenue. As stated on DEIR p. 69, the North Beach Neighborhood Commercial District is centered along Columbus Avenue, “which functions as a neighborhood-serving marketplace, citywide specialty shopping and dining district, tourist attraction, as well as an apartment and residential hotel area. The district provides most convenience goods and service for residents of North Beach and portions of Telegraph and Russian Hills.” Although the relative importance of Columbus Avenue is subjective, the importance of the commercial uses along Columbus Avenue is adequately described in the EIR.

As stated in on DEIR p. 51, “to the extent that the proposed project could conflict with a *General Plan* policy, those potential physical conflicts are noted in the EIR’s impact analyses. The final determination of consistency with the *General Plan* rests with the Planning Commission and the Board of Supervisors.

“The compatibility of the proposed project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project. The *General Plan* contains many policies that may address different goals. The Planning Commission, in considering whether to approve the proposed project, will determine whether the project, on balance, is consistent with most of the applicable objectives and policies of the *General Plan*.”

Comment LU-2: The EIR does not state that the project generally conflicts with many policies of the General Plan.

“The public process since 2008 really hasn’t shown property lines, it hasn’t shown where original fence lines are, so when you look at a green site plan, it does look very appealing. In fact, when I first saw that site plan in 2008, my initial reaction was positive. But, the more you look at it, the more you will see that it violates and contradicts many parts of the San Francisco General Plan.” (Howard Wong, Public Hearing Transcript, October 7, 2010)

Response LU-2

The comment refers to the proposed project's site plan and states that it conflicts with the *General Plan*. Potential conflicts with the *General Plan* are discussed in Appendix B of the DEIR. The proposed project potentially conflicts with the *General Plan* in so much as the building is deemed a historic architectural resource for the purposes of CEQA, and its demolition would result in significant and unavoidable individual and cumulative impacts.

However, despite this potential conflict with the *General Plan*, the Board of Supervisors has determined that the library should not be designated a local landmark nor part of a locally-designated district. Consequently, the building is not treated as a landmark. However, under the CEQA analysis, this building is treated as a historic resource. Please also see response to comment CP-4, on page 118, which further explains that the library is not a designated local landmark.

Comment LU-3: The EIR does not state that the project specifically conflicts with General Plan policies related to the location of non-recreational uses in parks.

"The General Plan tells you that you're not supposed to build a library in a non-recreational piece of property on a park land, it's right in there, it is in your – all of us here want a better library, but that's not it." (*Sal Busalacchi, Public Hearing Transcript, October 7, 2010*)

"The most obvious is the total disregard of any of our own policies. They were put in place so that we could follow guidelines not to override our own policies just because it suits this one project. If we disregard our own guidelines why have these policies in the first place? ...

"POLICY 2.2: Non-recreational Uses

Proposals for non recreational uses in public parks and playgrounds may arise in the future. Some may be for public facilities such as parking garages, streets and buildings, and for private or semi-public facilities. Development of this kind in parks and playgrounds should, without exception, be prohibited. Note: Libraries are considered non recreational use.'

"The City should gradually eliminate non-recreational uses in its public open spaces. In the past parks and playgrounds have been used as sites for public facilities such as libraries, fire and police stations, sewer plants and schools. Undoubtedly, the public need for them was great at the time of their construction and many are still essential. But as non-recreational facilities such as these become obsolete, the City is faced with the decision to renovate them or to relocate them altogether." (*Sal Busalacchi, Letter, October 7, 2010; October 12, 2010*)

"The concept from ROSE, the Recreation and Open Space Element of the City's General Plan, I'm actually quite familiar with because I served on and for several years chaired the Recreation and Open Space Advisory Committee. And indeed, North Beach was then 10-12 years ago when I served there, as it is now, designated officially in the City as a high needs area. So, the concept of additional recreation and park space is very telling and very apt in this area, without question." (*Commission President Miguel, Public Hearing Transcript, October 7, 2010*)

Response LU-3

The comment refers to the General Plan Recreation and Open Space Element (ROSE) Policy 2.2, which states that the city should gradually eliminate libraries from parkland.

As stated in the DEIR pp. 82–83, as well as in DEIR Appendix B, the proposed project would not convert existing recreational open space to another use. The existing branch library, which is located within the existing Joe DiMaggio Playground, would be demolished, and its footprint would be available for development as open space. The proposed building would be constructed on a surface parking lot, which is not an open space use under existing conditions for purposes of CEQA analysis, as stated in response to comment PD-1, on page 35. The project would allow for consolidation of open spaces uses on the project site. Therefore, the proposed project would not eliminate an existing recreational use, either on the 701 Lombard Street parcel or elsewhere.

Open space standards are discussed in the DEIR on pp. 72–74. As stated there, the North Beach neighborhood has about 1.0 acres of parkland per 1,000 residents, which is well below the citywide average of 9.0 acres of parkland per 1,000 residents.

Please also see response to comment LU-1, on page 74, which states that the *General Plan* includes many different goals, which will be weighed by decision-makers as part of their decision whether to approve or disapprove the proposed project. Please see response to comment PD-1, on page 35, which describes the history of acquisition of the 701 Lombard Street parcel by the city.

Comment LU-4: The EIR does not state that the project specifically conflicts with the General Plan policies related to urban design and requires “spot zoning.”

“Ignores Objective 15 of the Urban Design Element, which states that buildings should be visually interesting and harmonize with surrounding structures. ...

“Fails to address impact of spot rezoning and the many permits required to build the structure.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

“Given the location of the project site in a historic area, the DEIR is inadequate in that it fails to analyze the architecture of the proposed new building in relation to the “Fundamental Principles for Conservation” contained in the Urban Design Element. In particular, please analyze the proposed new building based the following principle: ‘Visually strong buildings which contrast severely with their surroundings impair the character of the area.’” (*Vedica Puri, Letter, October 12, 2010*)

“The DEIR fails to address how the proposed spot zoning of this single site to build onto the street complies with the specific objectives and policies of the Urban Design Element of the General Plan, which were adopted for the purpose of avoiding or mitigating the impact of the new development on the urban form. The DEIR must disclose and consider the project’s conflicts with the following: ...

“OBJECTIVE 3: MODERATION OF MAJOR NEW DEVELOPMENT TO COMPLIMENT THE CITY PATTERN, THE RESOURCES TO BE CONSERVED, AND THE NEIGHBORHOOD ENVIRONMENT.

POLICY 3.1: Promote harmony in the visual relationships and transitions between new and older buildings....

POLICY 3.3 [sic]: Recognize that buildings, when seen together, produce a total effect that characterizes the City and its districts. ...

POLICY 3.6: Relate the bulk of buildings to the prevailing scale of development to avoid an overwhelming or domination appearance in the new construction....

POLICY 12.3: Design new buildings to respect the character of older development nearby. ...

POLICY 15: Create a building form that is visually interesting and harmonizes with surrounding buildings....

POLICY 15.1: Ensure that new facades relate harmoniously with nearby facade patterns....

POLICY 15.3: Encourage more variation in building facades and greater harmony with older buildings through use of architectural embellishment and bay or recessed windows.” (*Sal Busalacchi, Letter, October 12, 2010*)

“The proposed Triangle Library and Playground Master Plan contradicts multiple principles of the San Francisco General Plan. By example, the Urban Design Element’s:

- ‘Maintaining a strong presumption against the giving up of street areas for ... construction of public buildings.’
- ‘Recognize and protect major views in the city, with particular attention to those of open space and water.’” (*Howard Wong, AIA, E-mail, October 12, 2010*)

Response LU-4

The commenters refer to the Urban Design Element of the General Plan and question how the proposed project complies with policies related to development that complements the surrounding visual character.

The role of the DEIR is not to illustrate how the proposed project *complies* with the General Plan’s Urban Element, but to identify *possible conflicts* that could result in potentially significant adverse physical effects.

Potential conflicts with the General Plan are discussed in the DEIR in the Plans and Policies chapter (p. 51) and the Land Use and Recreation chapter (pp. 82–83). These sections of the DEIR also reference a DEIR Appendix B, which includes an analysis of the proposed project’s potential conflicts with General Plan policies. The DEIR also includes an analysis of aesthetics impacts in Chapter 4.B.

The analysis of the proposed branch building’s potential aesthetic impacts are based on the degree of potential change associated with the project and whether the project would result in a substantial, “adverse effect on a scenic vista” or substantially “degrade the existing visual

character or quality of the study area or its surroundings.” As called for in the CEQA environmental checklist, the analysis is based on a comparison of building heights, massing, lot pattern and rhythm, material types, color, relationship of the proposed branch to open space and other uses, as well as the degree to which view obstruction could occur.

Figures 30, 31, and 32 on DEIR pp. 126–128, and the supporting DEIR text, show the proposed library within the context of its surroundings. Regarding height, the proposed 30-foot building would be 10 feet shorter than what is allowed under the 40-X height and bulk district. It would be within the range of heights of the two- and three-story buildings directly across Columbus Avenue, Lombard Street, and Greenwich Street from the project site, as well as along Columbus Avenue in both directions. Regarding lot width, please see response to comment AE-5, on page C&R-106, which states that narrow lots are prevalent in the neighborhood, but more-so along side streets than along Columbus Avenue. (Because Columbus Avenue runs diagonally relative to the prevailing street grid, in many instances it makes for longer, diagonal lot lines.)

Architectural taste is subjective, and based on the above, the branch would not “contrast severely” with the surrounding area such that an adverse impact on the site’s visual character would occur. Several existing buildings along Columbus Avenue are contemporary and exhibit diverse architectural styles, but nonetheless do not necessarily contrast severely with the surrounding area. Such buildings include the Indonesian Consulate General Building at 1111 Columbus Avenue, the Bimbo’s Theater building at 1002 Columbus Avenue, the approved Pagoda Palace Theater redevelopment at Powell Street, the Citibank building at 1511 Stockton Street, and others.

Please see response to comment AE-2, on page 100, which discusses how the proposed project would complement the existing architectural character of the neighborhood.

Regarding “spot zoning,” the parcel where the library is proposed would be zoned consistent with the entire block to its east to which it would be merged. The entire project site would be within a P Use District. As stated in the DEIR on p. 55, the purpose of the P Use District is to relate the zoning map to the actual public land use located on that land. If the 701 Lombard parcel were developed as open space, as under the Preservation and Rehabilitation Alternative, such a rezoning could be undertaken for the same purpose.

Regarding the policies listed above, the EIR determined that potential impacts to visual character would be less than significant. Urban Design Element Objective 3, Policy 3.1, and Policy 3.6 relate to harmony between existing development and new development. As stated in the Draft EIR in Appendix B and reiterated above, the proposed library building would complement the existing character of the area. The other items listed above (“Policy 3.3,” “Policy 12.3,” “Policy 15,” “Policy 15.1,” and “Policy 15.3”) are not policies within the Urban Design Element of the General Plan, but rather are taken from the Downtown Plan, an area plan within the General Plan that is not applicable to the North Beach neighborhood. It is noted, however, that Downtown Plan Policy 12.3 is similar to Policy 2.6 in the Urban Design Element, “Respect the character of older development nearby in the design of new buildings.” Because the proposed new library building would be compatible in scale and massing with nearby development, and

because the building would be separated on all three sides from other buildings by existing streets, the project would not substantially contrast in style, height, massing, or façade materials of nearby buildings to the extent that would result in a significant impact to visual character. Moreover, the visual impacts of the activities of demolition of the existing library and construction of the new library, including lay down areas, construction equipment, and staging, would not be permanent characteristics of the visual environment. Therefore, impacts were found to be less than significant.

Comment LU-5: The EIR does not state that the project specifically conflicts with General Plan policies related to the removal of street trees.

“The DEIR is inadequate in that it fails to disclose the project’s conflict with the *General Plan* in relation to the removal of these mature street trees. And as stated in the DEIR (Pg 120): ‘*The library would occupy sidewalk space typically occupied by street trees.*’” (Vedica Puri, Letter, October 12, 2010)

Response LU-5

The comment refers to street trees. It is unclear exactly to which policy the commenter refers. Transportation Element Policy 24.2 states that the City shall “maintain and expand the planting of street trees and the infrastructure to support them.” Additionally, the Urban Design Element generally promotes tree planting and states, in the tabulation of Fundamental Principles for Neighborhood Environment (under Objective 4, “Improvement of the neighborhood environment to increase personal safety, comfort, pride and opportunity”), that “The livability, amenity and character of residential areas are greatly enhanced by trees, more so than by any other single element.” However, no policies are specifically directed at street trees.

The DEIR adequately discloses potential impacts on street trees. The Project Description on pp. 36–37 lists tree type and quantity proposed for removal and the new street trees that would be planted in connection with the new library:

- Two Indian Laurel Fig trees on the Columbus Avenue sidewalk would be removed and replaced with six Brisbane Box trees and granite setts (cobble stone).
- One Indian Laurel Fig tree on the Lombard Street sidewalk would be replaced with three Krauter Vesuvius Cherry Plum trees and Irene Rosemary planting.
- Two cherry trees on the western Mason Street sidewalk, and seven London Plane trees on the eastern Mason Street sidewalk, would be replaced with five London Plane trees and Irene Rosemary planting beds.

Page 50 of the DEIR states that the project may require review and tree removal permits from the Department of Public Works Bureau of Urban Forestry. Bureau of Urban Forestry would evaluate the trees and make recommendations to approve or deny removal. If the tree is granted removal, a 30-day notice is placed on the tree, as well as on the four corners of the block. Written objections to removal result in a tree hearing, and the decision from that hearing is usually made within two weeks. Appeals to that decision must be submitted within 15 days, to the Board of Appeals,

whose decision is final.¹⁰ As stated in the Initial Study and described on p.37 of the DEIR, removed trees would be replaced.

Concerning the two cherry trees on Mason Street, if removed prior to the proposed interdepartmental transfer of the Mason Street right-of-way to the Recreation and Park Department, removal of these trees would be under Bureau of Urban Forestry procedures. If proposed for removal once they are on Recreation and Park Department property, these trees would be subject to that department's tree removal procedures, adopted in 1997. These procedures specify, for neighborhood parks, posting of a "high visibility notice" for 30 days, notification of applicable neighborhood association(s) to the extent feasible, and community involvement if appropriate. Department procedures also call for pre-work surveys for nesting birds and halting work if a nest is found.¹¹

As stated in the Initial Study (Appendix A of the DEIR) on p. 62 – 63, Mitigation Measure BI-1 would reduce impacts of tree removal on nesting birds to less-than-significant levels. The removal of street trees and the impact to visual character are also discussed under Impact AE-2 beginning on DEIR p. 125, as well as response to comment AE-3, on page 103. Impacts would be less than significant.

Comment LU-6: The EIR does not adequately analyze effects to the character of the Columbus Avenue intersection that would result from the proposed project.

"For me the third item under "[Significance] Criteria" on Page 77 does describe the ultimate consequences of the planned sweeping makeover of this important, wide open intersection. It would have a substantial impact on the existing character of the vicinity." (*June Osterberg, Letter, October 12, 2010*)

"This historian [whom I consulted] has an encyclopedic knowledge of Italian town squares and comments that North Beach replicates these priceless open spaces because it was built by Italians. He suggests that plunking a suburban commercial-style building in the middle of an open space in the Columbus Avenue flats perpetuates the dreary existing situation. Following the example set by Washington Square is far more appropriate to the neighborhood—a spacious, tree-filled green space with a large frontage on Columbus Avenue." (*Zack Stewart, Letter, October 9, 2010*)

Response LU-6

The commenters' opinion of the style of the proposed library is noted. Contrary to the statement made by the commenter, the proposed library would not be sited in the middle of an open space along Columbus Avenue. As shown on the site plan (Figure 8 on DEIR p. 38), the proposed library would be located at the northwest corner of the site, with open space and programmed recreational areas to its east and south, along Columbus Avenue.

¹⁰ Short, Carla, Department of Public Works Bureau of Urban Forestry, personal communication with Branch Library Improvement Program staff, December 20, 2010.

¹¹ San Francisco Recreation and Park Department, "Tree Removal Procedures," adopted July 31, 1997; and "Pre-Work Bird Survey Policy for Recreation and Park Department Urban Forestry," undated. These documents are available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2008.0968E.

The project's impacts to neighborhood character are discussed under Impact LU-3 beginning on DEIR p. 84. As stated there, the project would increase the civic presence on Columbus Avenue, but would not alter, in an adverse manner, the land use character of the neighborhood. Impacts to visual character are discussed under Impact AE-2 beginning on DEIR p. 125.

Comment LU-7: The EIR misconstrues the Branch Facilities Plan.

"The *Branch Facilities Plan* is seriously misconstrued in Draft EIR.

"The Draft EIR (DEIR) says the following:

'The proposed project [demolition of the existing North Beach library and replacement with a new branch] incorporates the goals of the *Branch Facilities Plan*, and thus would not obviously conflict with the Plan.' (See Page 59, last sentence under 'E. Branch Facilities Plan')

"This is completely unsupported by the document. And we are concerned that if prior plans can be so completely misconstrued, how reliable—and unbiased—can the rest of the DEIR be?

"The *Branch Facilities Plan* prepared by the library in 2000, clearly shows plans for a renovation of North Beach Branch library—not a demolition and replacement with a new building as is now planned.

"The renovation plans stood for at least seven (7) years, until the time that Proposition D passed in 2007, providing greatly increased funding for construction and renovation of branches. At approximately that time, the library decided to demolish and replace North Beach.

"The *Branch Facilities Plan* says nothing about demolition or replacement. By contrast, it does say the following:

'The proposed plan is to seismically upgrade the structure, make the multi-level layout ADA accessible and add program space.' (Section 4.3.1 0, page 78)

'The proposed modernization plan envisions an expanded facility to accommodate new and flexible program areas.' (Section 4.3.1 0, page 79)

"The full survey for the branch runs from pages 78 through 82.

"Regarding 'Site Selection for New Branch Libraries,' the *Branch Facilities Plan* says the following (Sec. 6.1, page 140):

'Architecturally Significant Buildings

Properties considered by the Planning Department to be 'architecturally significant' in their own right or significant to the context of the neighborhood are not considered appropriate for demolition and will be eliminated from consideration.

"The Planning Department's own analysis and that of others has evaluated North Beach Branch as worthy of being landmarked, and a staff Planner confirmed to us that this makes the branch fit the term of art, 'architecturally significant.'

“The *Branch Facilities Plan* has a section discussing ‘Historic Rehabilitation Issues,’ Section 9.1. While focusing primarily on the Carnegie branches, it acknowledges there are other facilities that should be retained, as follows:

‘Although the Carnegie Libraries have drawn the attention of the LPAB, other facilities in the branch library system are also greater than fifty (50) years old. A consistent approach is recommended for the branch library’s future capital improvements on all of the older facilities, especially the Carnegies. However, any capital improvement plans shall have as a goal to retain the building’s functional and useful life for users and staff. Such a goal can be met using flexible, experienced design that utilizes historic criteria to optimize, rather than restrict, design options. Therefore, the selection of architects and engineers shall take into consideration this specialty.’ (Emphasis added ~ ref. Page 238, Sec. 9.1)

“The *Branch Facilities Plan* also says that two-story buildings are to be avoided. Section 7.3, ‘Functional Program, General Design Considerations,’ says the following:

‘6. Whenever possible public services should be located on one floor for the convenience of library users and to maximize the use of the staff and minimize operating costs.’ (See page 147)

“Of course, the new building plan is a two-story plan with some public space on the second floor. (*Peter Warfield, Executive Director, Library Users Association, E-mail, October 12, 2010*)

Response LU-7

The DEIR on p. 59 states that the proposed project incorporates the goals of the *Branch Facilities Plan*, but it does not state that it follows the plan as envisioned in 2000. As stated on p. 59, the *Branch Facilities Plan* is considered “a living document,” and the information contained in that plan is considered to be preliminary in developing a scope of work for construction projects. For example, as stated on DEIR pp. 25–26, the *Branch Facilities Plan* for the North Beach Library was informed by the 1995 seismic assessment, but there have been at least two building code changes since that assessment was prepared. Therefore, strict adherence to the *Branch Facilities Plan* provisions would be tantamount to adherence to outdated standards.

Comments regarding historic rehabilitation as described in the *Branch Facilities Plan* are noted. As stated in response to comment CP-4, on page 118, the DEIR found that the proposed project would result in significant and unavoidable impacts to historic resources.

Subsequent to the publication of the *Branch Facilities Plan*, the Branch Library Improvement Program and SFRPD engaged in a community-specific Master Planning process and developed objectives that shaped the project described in the DEIR.

Comments regarding the accessibility of public services are noted. The proposed project incorporates all public services on the ground floor, as well as an ADA-accessible public meeting room on the second floor. The existing library building does not incorporate all public services on the ground floor. Please also see response to comment PD-16, on page 73, which reiterates that one of the project sponsors’ objective is to provide an accessible facility meeting current ADA requirements.

Recreation

Comment RE-1: The EIR does not acknowledge that the project would result in reduction in size of the multi-purpose hardscape area, which could affect some uses, such as softball and baseball.

“The EIR must include the fact that it will eliminate the softball field and reduce usable open space because of erroneous use of Mason Street’s area and the sloping areas that lead to the playfields.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

“Three softball fields within the Playground, one used by Joe DiMaggio himself, would be completely eliminated in Phase II because total multipurpose hardscape surface is reduced by 12,000 square feet. The Joe DiMaggio Playground is the only one of its kind in San Francisco; i.e. all-purpose level hardscape. (There is a marginal increase in the children’s play site, but not the all-purpose hardscape.)” (*Joan Wood, Letter, October 12, 2010*)

“In 1981 the North Beach Playground was renamed Joe DiMaggio Playground in order to honor the neighborhood’s preeminent athlete, not because he played there. All of the major histories of Joe DiMaggio, and Dom DiMaggio’s memoirs, relate that the brothers played ball in a Fisherman’s Wharf dirt lot where a dairy park their carts.” (*Lee Goodin, E-mail, October 12, 2010*)

“The impact on the Joe DiMaggio playground by reducing the size and removing the implied historic Joe DiMaggio baseball field. ...

“There was never an outreach or mention in the DEIR to let everyone know that the baseball field will be eliminated or diminished so much that the left field will be made shorter or gone. This is an outrage. This playground is called the Joe DiMaggio playground and to eliminate the field is a slap in the face to one of the greatest baseball players and the Italians who live in North Beach.

“There is no mention in the DEIR that it could be dangerous for the children playing in the toddlers’ area or the adults playing tennis, because now these areas would be approximately 41 feet closer to the baseball field and would be easier to reach with a home run. ...

“The objectives of the project sponsors’ say that they will maintain all currently existing park program element, including the softball field. (Bottom Page 29) How can this statement be true when the left field will be shortened by 41 to 41 feet [sic] thus eliminating left field? This is a misleading statement.” ...

“San Francisco has over one hundred parks and recreation facilities which function mainly for neighborhood use. While the number of neighborhood parks and facilities is impressive, they are not well distributed throughout the City. Over the years there were more opportunities to build new parks in the less developed parts of the city. The older, more densely populated areas contained few sites suitable for parks, and those which were available in built-up areas tended to be more costly compared to land in outlying areas. The result has been an unequal distribution of facilities throughout the City. The inequality merits correction where neighborhoods lacking parks and recreation facilities also have relatively high needs for such facilities. Removing a baseball field whereas children have to travel out of their own district is not an option. Access is a key factor in park utilization. If people cannot get to parks easily,

their recreational value is reduced. Every San Franciscan should be served by a park within walking distance of their home.” (*Sal Busalacchi, Letter, October 7, 2010; October 12, 2010*)

“The EIR fails to say the baseball fields where Joe DiMaggio played are going to be completely eliminated. It fails to discuss some of the restrictions on open space that come about as a result of the plan.” (*Sue Cauthen, Public Hearing Transcript, October 7, 2010*)

“Okay, keeping it on a baseball theme, you know, I think a lot of what the EIR did looks good. One thing that does concern me is having enough room for baseball, and everyone has mentioned that Joe and Vince and Don grew up there and a lot of other great baseball players playing on that very playground, we’ve got to make sure, however, this is reconfigured, that if it is reconfigured, that the ability to play baseball, which a lot of guys do, is still able to be done.” (*Commissioner Antonini, Public Hearing Transcript, October 7, 2010*)

Response RE-1

The commenters state that the DEIR does not acknowledge the impacts to the existing multi-purpose hardscape area on the project site. They also state that there was no outreach to the community to discuss the proposed changes to the multi-purpose hardscape area and how that would affect the size of the softball field.

As stated in the DEIR project description on pp. 26–28, the project sponsors undertook a Master Planning process with the community. The Master Plan resulted in a Phase 2 site plan that showed relocation of the tennis courts southeast from their current location, as shown in Figure 8 on DEIR p. 46. As stated in the DEIR on pp. 92–93, under Phase 2 of the proposed project, the area that can be informally used for softball would remain in its current configuration, but the left field wall would be delineated by a fence 175 feet from home plate, which would be 40 feet closer than under existing conditions. Therefore, the potential use for informal softball would not be “completely eliminated.” However, the area would continue to not meet National Softball Association standards, and the surface would still be blacktop.

Therefore, contrary to the comment, the project sponsors undertook community outreach to develop the proposed Master Plan, including the Master Plan component that would alter the dimensions and configuration of the paved, multi-purpose area.

The DEIR acknowledges that occasional informal softball in the multi-purpose area could be affected. Please see response to comment RE-2, on page 87, which describes the conceptual changes in sizes of each playground feature under Phase 2 of the Master Plan. As stated there, the active multipurpose hardscape area is envisioned to be about 43,100 square feet under the Master Plan, and it is currently about 52,995 square feet. The total reduction in active multipurpose space would be about 9,900 square feet. The commenter notes that the sponsors’ objectives are to maintain all existing park program elements. This is correct. The tennis courts, children’s playground, and multi-purpose hardscape area (including space devoted to basketball and softball) would all be maintained under Phase 2 of the proposed project, although their sizes, shapes, and overall space allocation would change, as illustrated throughout the DEIR. Contrary to the comment, the DEIR adequately describes this as a component of the proposed Master Plan.

However, the DEIR also notes that there is currently no SFRPD-permitted softball or baseball play at the location. The field is occasionally used through open play to practice baseball, softball, rollerblading soccer, bicycle riding, volleyball, basketball, four-square, and other informal play. According to informal observations of SFRPD staff, the most popular uses are basketball and soccer, which is why the proposed Phase 2 design includes additional basketball courts.¹² Please also see comments G-1 in this document, on p. 20, in which a local RollerSoccer activity manager supports the proposed Phase 2 configuration.

As under existing conditions, fencing would separate the multi-purpose hardscape area from other playground elements. This fencing would reduce potential conflicts between different recreational uses. Also, given the age of the children that typically play on the playground features, that the existing softball field does not meet size standards, and that permitted softball and baseball games are not held at the playground, SFRPD considers the danger from occasional softball use in the area with other recreational uses to be remote.

The multi-purpose hardscape area is not used for SFRPD permitted softball games, and a permit for a softball game has not been issued by SFRPD for two years for this site.¹³ Like at many parks, the field can be used for open softball play, which means that the events are not organized and do not require a permit from SFRPD. The existing area provided does not meet National Softball Association standards, and the National Softball Association does not recommend that softball be played on black top.

In comparison, the nearby Moscone Recreation Center in the Marina district has softball and baseball fields and on average hosts 45 permitted games per week from April through October, which amounts to 1,260 permitted games per year. In addition, the James P. Lang Field, in the Western Addition, hosts about 24 games per week at two softball diamonds, resulting in about 670 games per the season each year. These and other facilities citywide provide about 50 grass and turf fields for baseball or softball play within the city.¹⁴

Some commenters claim that Joe DiMaggio played at the softball field. Other commenters state that he did not. SFRPD cannot confirm or deny that he played there. Nonetheless, the naming of the playground after Joe DiMaggio is not relevant to the proposed Master Plan's less-than-significant physical impacts to recreational resources. The playground was formally renamed Joe DiMaggio North Beach Playground by Recreation and Park Commission Resolution No. 11947, adopted February 14, 1980, "as an appropriate and fitting tribute to a man who has contributed so much to the sport of baseball and the City of San Francisco."¹⁵

Please also see response to comment CP-1, on page 111, which states that the significance of the playground derives from its use as a recreational space, that there are no discernible historic or

¹² *ibid.*

¹³ Mauney-Brodek, Karen, personal communication with ESA, SFRPD, February 15, 2011.

¹⁴ Mauney-Brodek, Karen, *Memorandum: 2008.0968-North Beach Library and Joe DiMaggio Playground Master Plan Project Data Needs: Paved Softball Area*, to: Planning Department, MEA, SFRPD, August 2, 2010. A copy of this document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in File No. 2008.0968E.

¹⁵ Recreation and Park Commission minutes (excerpt), February 14, 1980. A copy of this document is available for review at the Planning Department, 1650 Mission Street, Suite 400, in File No. 2008.0968E.

character-defining aboveground elements that would be affected by the proposed Master Plan, and that the proposed project, therefore, would have a less-than-significant impact on historical resources.

The density of the North Beach neighborhood, and the demand for recreational facilities, are discussed in response to comment RE-3, on page 91. As stated there, the project would result in less-than-significant impacts to recreation.

Comment RE-2: The EIR has incorrect calculations of the number of square feet of recreational open space that would result from the proposed project.

“In spite of its claims that the proposed project would add a new 12,000 square feet of new open space and a new 13,700 sq foot children’s play area, the DEIR contains no accurate description or clear comparison of existing and proposed dimensions and square footage of the individual outdoor recreation spaces. A clear comparison of the existing and proposed dimensions and square feet for each of the individual outdoor recreation spaces must be set forth and clearly shown on Figure 3 (Existing Conditions) and Figure 8 (Master Plan Phase No. 2). However, the scale of these two figures is different in the DEIR making comparison between them difficult.

- (a) Make the scale of Figures 3 and 8 the same and set forth on these figures the exact dimensions and square feet of each of the following features in their Existing and Master Plan Phase 2 conditions:
 - (1) Multipurpose Hardscape Area
 - (2) Tennis Courts
 - (3) Children’s Play Area
 - (4) Bocce ball courts
 - (5) Undeveloped area of Mason Street
 - (6) Footprints of existing and proposed library
- (b) Show on Figure 8 exactly where the ‘new, approximately 13,700 sq foot play area would be constructed in the center of the block.’ (Pg 45)
- (c) Show on Figure 8 all the new fenced area that would be located within the boundaries of the playground for the (1) the multipurpose hardscape area, (2) the tennis courts, (3) the children’s play area, and (4) the bocce ball courts. ...

“No Factual Basis in the DEIR to Support Claim that New Children’s Play Area Will Be 13,800 sq ft in size. The existing children’s play area is a flat rectangle parcel of 9,900 sq ft., all of which is usable as a play area. The DEIR claims, without showing any dimensions on a drawing of the proposed Master Plan, that the relocated play area would be 13,800 sq ft in size. Please show how this 13,800 sq ft is calculated by:

- (a) Showing on Figures 3 and 8 (using the same scale) the exact dimensions and square feet of each of the following features in their Existing Condition and Master Plan Phase 2 conditions:
 - (1) Multipurpose Hardscape Area
 - (2) Tennis Courts
 - (3) Children’s Play Area
 - (4) Bocce ball courts
 - (5) Undeveloped area of Mason Street
 - (6) Footprints of existing and proposed library

- (b) Including on Figure 8 the exterior boundaries of the new 13,700 sq foot children's play area.
- (c) Including on Figure 8 all the new fences that would be located within the boundaries of the playground to separate the children's play area from the multipurpose hardscape area and from the bocce courts.
- (d) Including an estimate of the total square footage of walkways and ramps within the 13,800 sq ft of proposed new children's play area.
- (e) Is the Bocce Court area included within the 13,800 sq ft of new children's play area?" (*Vedica Puri, Letter, October 12, 2010*)

"The Value Engineer [whom I consulted] says that there is a zero sum gain involved in destroying three tennis courts, and then rebuilding them new, there is no net gain there, and destroying a playground, and then building it new, there is no net gain there. And destroying a building and building it new, there is no net gain there. She also points out that North Beach has a lot of buildings and it doesn't need another new one." (*Zack Stewart, Public Hearing Transcript, October 7, 2010*)

"The playground where I played is going to be decreased by 12,000 feet; I will be submitting drawings showing you how that's been done. The closure on Mason Street does add more park land and playground to the area, but that should not be counted in any true addition to the playground because it can be closed in any design scheme. The softball fields will be eliminated in the Master Plan, and that is because the fence will be moved 41 feet eastward, and that is also shown in the plan." (*Howard Wong, Public Hearing Transcript, October 7, 2010*) ***Drawings were separately submitted and accompany commenter's written comments in Attachment 1 of this document***

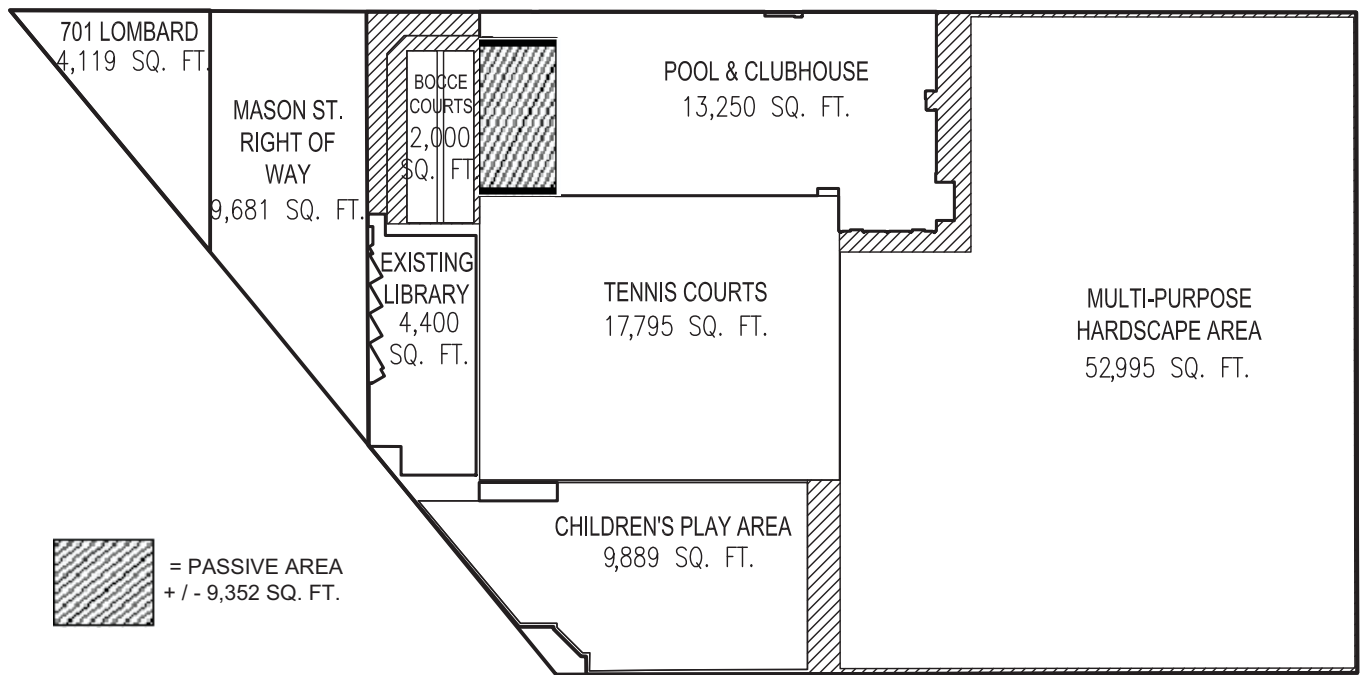
Response RE-2

The commenters request specific measurements of recreational program areas that would be in place after completion of Phase 2 of the proposed project. Commenters also state that comparison between figures in the DEIR is not possible due to differences in scale. Please see new figures, **Figures C&R-2 through C&R-4**, provide a same-scale comparison of existing conditions and conditions under the proposed Master Plan in foldout, 11x17 pages.

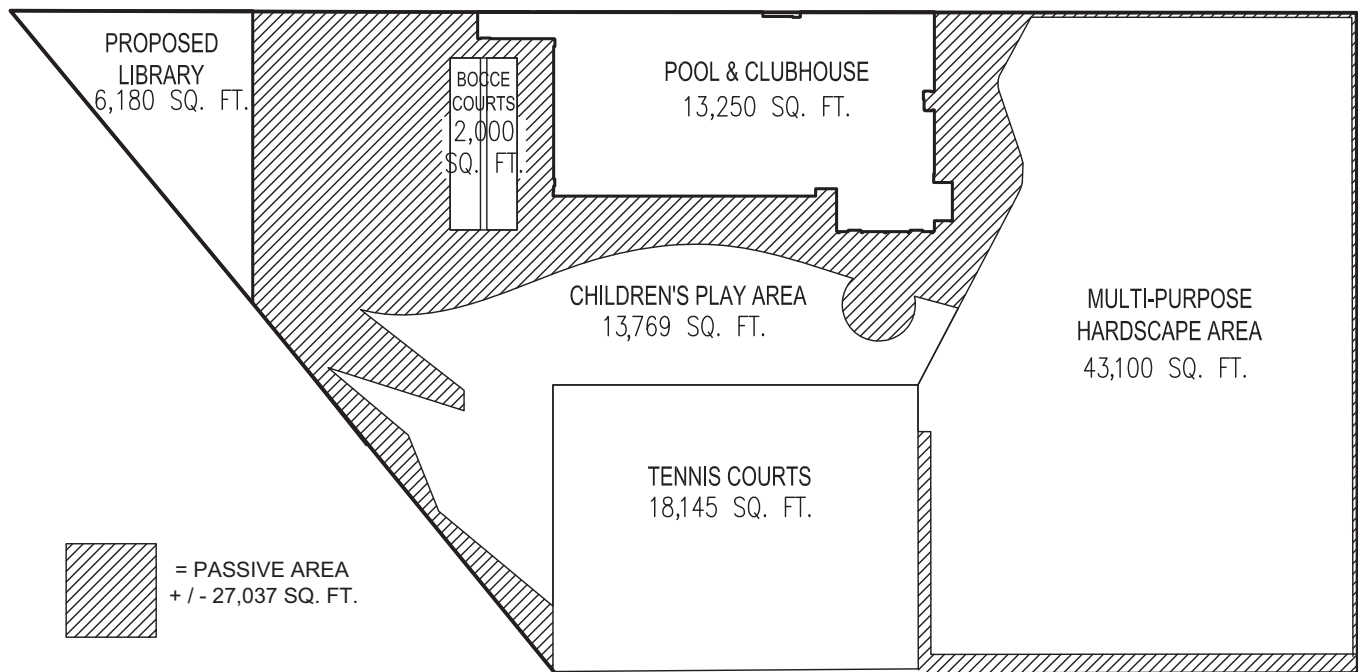
Figure C&R-2 provides a direct comparison of individual playground programmatic elements and their measurements. Please note that these figures are estimates, and measurements in **Figure C&R-2** are based on the proposed Master Plan. Measurements within **Figure C&R-2** are also in **Table C&R-1**. When and if funds are identified for the implementation of phase two of the Master Plan, the design would be refined and exact dimensions would be determined.

Comment RE-3: The EIR should further discuss service ratios for park space, walking distance to parks, and breakdowns of number of users for each element within the existing playground.

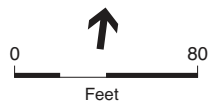
"The DEIR's description of the Recreational Environmental Setting assumes that North Beach is like other American cities in national surveys. Given that there are less privately owned cars in North Beach than in other parts of the City, how can the DEIR make the assumption that people are only willing to walk 1/2 mile to the park?



EXISTING CONDCTIONS



PROPOSED CONDCTIONS

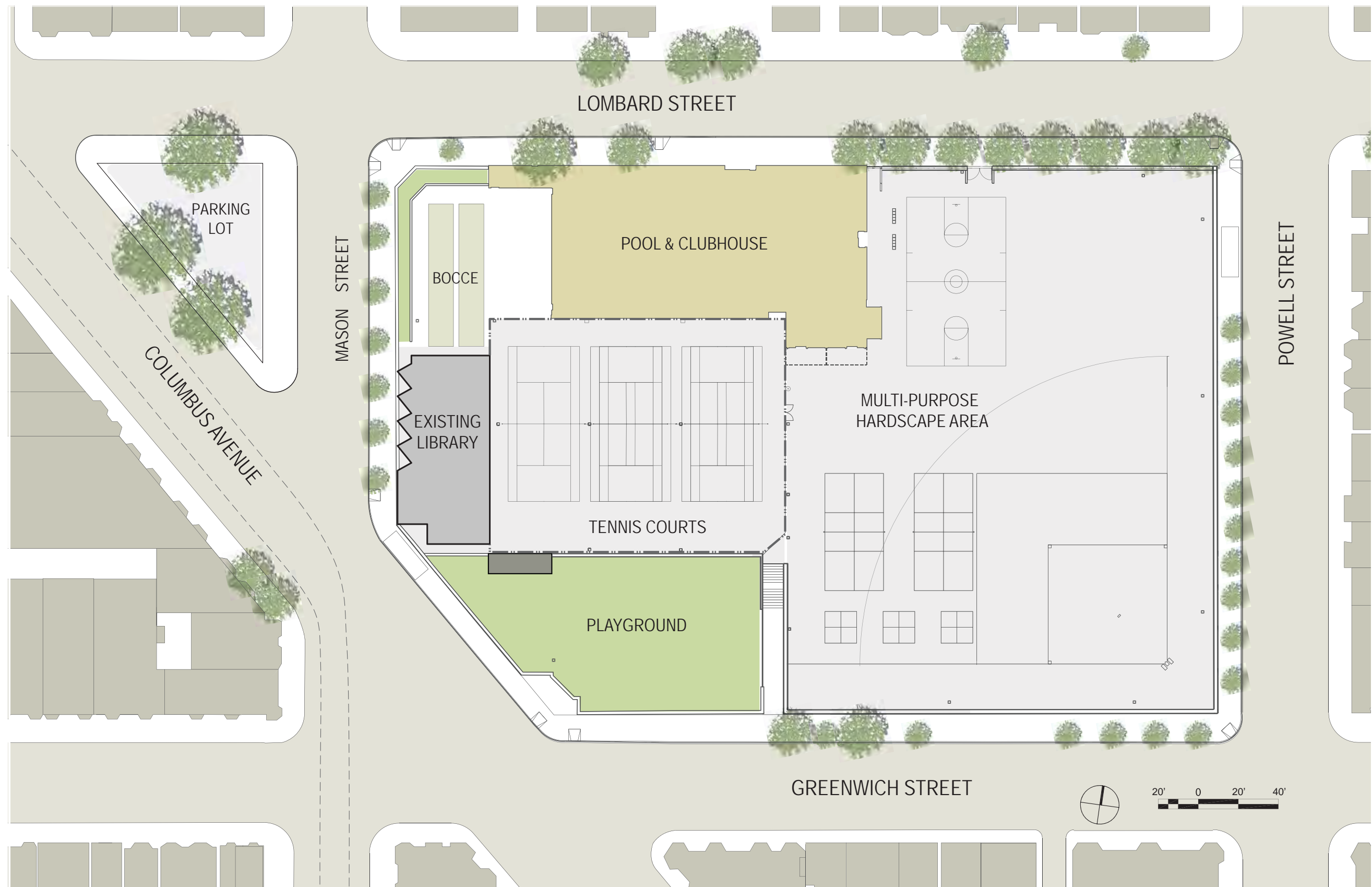


SOURCE: LMS Architects, SFRPD

2008.0968E: North Beach Public Library . 206352.01

Figure C&R-2
Park Use Area Calculations

Note: Measurements are based upon available survey information and are not field verified. When and if funds are identified for the implementation of phase two of the Master Plan, the design will be refined and exact dimensions will be determined.



SOURCE: LMS Architects

2008.0968E: North Beach Public Library . 206352.01

Figure C&R-3
Existing Conditions Foldout



TABLE C&R-1
JOE DIMAGGIO PLAYGROUND PROGRAM ELEMENT AND OTHER PROJECT SITE MEASUREMENTS

| Area | Existing Conditions* | Proposed Project Condition* | Approximate Change |
|--|--|---|----------------------|
| Multipurpose Hardscape Area | +/- 52,995 square feet | +/- 43,100 square feet | - 9,895 square feet |
| Tennis Courts | +/- 17,795 square feet | +/- 18,145 square feet | - 350 square feet |
| Children's Play Area | +/- 9,889 square feet | +/- 13,769 square feet | + 3,880 square feet |
| Bocce Courts | +/- 2,000 square feet | +/- 2,000 square feet | 0 square feet |
| Passive Open Space | +/- 9,352 square feet (Area surrounding bocce courts and circulation space within playground) | +/- 27,037 square feet (Walking paths and seating in former Mason Street ROW; circulation within playground) | + 17,685 square feet |
| Building Footprint Area | +/- 17,650 square feet (Existing Library and Pool/Community Building) | +/- 19,430 square feet (Proposed Library and Pool/Community Building) | + 1,780 square feet |
| Mason St. right-of-way & 701 Lombard (currently used as parking lot) | +/- 13,800 square feet | 0 square feet | - 13,800 square feet |
| Total | +/- 123,481 square feet | +/- 123,481 square feet | 0 square feet |

*Measurements are based upon available survey information and are not field verified

“In the DEIR’s discussion of the population in the project vicinity, it should include the total number of people in the park service area and their age ranges (senior, youth, child) in order accurately determine the types of recreational facilities needed to serve its population. This is relevant to the proposed Master Plan reconfiguration and improvement of SFRPD’s facilities in the Playground.

“The DEIR should contain information to show the total number of park users broken down by: (1) the multipurpose hardscape area, (2) the tennis courts, (3) the children’s play area, and (4) the bocce courts.”
(Vedica Puri, Letter, October 12, 2010)

Response RE-3

Recreation and open space standards are discussed in the DEIR on pp. 72–74.

As stated on p. 74, while cities across the nation have different recommendations for park distribution, the National Recreation and Park Association recommends between 0.25-mile and 0.5-mile radius service area for the types of facilities included at Joe DiMaggio Playground. The reason that the DEIR assumes that people would generally walk about 0.5 miles to a park is that the current Draft General Plan Recreation and Open Space (ROSE) Element discusses a recommendation of 0.5 miles for the service area of a park, and 0.25 miles for a children’s play area.

As stated in the DEIR, the North Beach neighborhood has an average of 1.0 acres of parkland per 1,000 residents, which is well below the citywide average of 9.0 acres per 1,000 residents. As

stated on p. 73, the Draft ROSE Element states that North Beach is a high needs area. Therefore, the DEIR includes local, city-specific criteria for adequate parkland provision per population. Additional demographics related to age ranges are incorporated into the overall conclusion or fact that North Beach is a high needs area.¹⁶

SFRPD does not have surveys of Joe DiMaggio Playground users broken down by individual feature. However, as stated in response to comment RE-1, on page 84, basketball and rollerblading soccer appear to be the most popular games played on the multipurpose hardscape area based on SFRPD empirical observation. General group recreation and bike riding also appear popular. As stated in section on DEIR p. 67, usage counts conducted in April 2009 found 121 people used the playground p.m. peak-period, and this usage would increase to about 137 people with the proposed project.

Comment RE-4: The EIR should discuss open spaces along Columbus Avenue.

“The DEIR is inadequate and incomplete in that it does not include a description of the series of green public open spaces along the entire length of Columbus Ave. of which the triangle parcel is (or could be) a part if it is developed as open space, with or without Mason Street. Include in the DEIR a map and description of all of the other open spaces along Columbus from the waterfront to Redwood Park including their size in square feet.” (*Vedica Puri, Letter, October 12, 2010*)

Response RE-4

The comment refers to public open spaces along Columbus Avenue but does not state how such spaces have to do with the adequacy of the EIR.

A description of open spaces in the project site vicinity, as well as their square footage, is provided in Table 6 on DEIR p. 74. A description of the visual character of nearby public open spaces is provided in the DEIR on p. 101.

Please also see new **Figure C&R-5**, which includes a map of open spaces along Columbus Avenue from the Draft ROSE Element. As shown in the figure, the Joe DiMaggio Playground and Washington Square/Marini Plaza (the two are divided by Columbus Avenue) are the only open spaces located along Columbus Avenue, except for Joseph Conrad Square at Beach Street. The proposed project would continue the existing recreational use at the playground, as well as demolish the existing library and vacate Mason Street at Columbus Avenue, thereby increasing the open space presence directly along Columbus Avenue.

Comment RE-5: The EIR should discuss that the clubhouse is closed due to lack of funds.

“Given the fact that the ‘Clubhouse’ is currently closed due to lack of funds for staff, how does this change the stated desire for ‘mothers’ to have the play area adjacent to this clubhouse? How does this closure impact the availability of restroom facilities?” (*Vedica Puri, Letter, October 12, 2010*)

¹⁶ San Francisco Planning Department, *Draft Recreation & Open Space: An Element of the General Plan of the City and County of San Francisco*, Figure 2: High Needs Areas, May 2009, p 19.



SOURCE: San Francisco Planning Department, Draft ROSE Element, 2009

2008.0968E: North Beach Public Library . 206352.01

Figure C&R-5
Open Spaces Along the Columbus Avenue Corridor

Response RE-5

The comment refers to the clubhouse. As stated in response to comment PD-14, on page 68, the clubhouse is currently open by SFPL for programs on a limited basis, and it may be open additional hours in the future with partnerships with not-for-profit groups and/or other service providers. Parents attending these programs would be able to visually survey activities on the playground through the windows of the clubhouse during those programs. As also stated in response to comment PD-14, the clubhouse restrooms are open weekdays independently of the clubhouse hours, as they are accessed separately from the exterior of the building.

Aesthetics

Comment AE-1: The EIR is incorrect in its determination that the project would have a less-than-significant impact on scenic views and vistas, particularly regarding the view available from the existing parking lot and from Columbus Avenue at Lombard Street.

“The DEIR’s Conclusion that the Proposed New Building Does Not impact Scenic Views is a Subjective and Biased Judgment Not Adequately Supported by a Presentation of the Facts.

“The DEIR does not include accurate photos of the existing scenic public views of the areas landmark features including Telegraph Hill, Saints Peter and Paul Church and the Transamerica Pyramid—views enjoyed and photographed by many thousands of tourists each year—that would be cut off but the new building.

“The photos included in the DEIR that purport to show the impact on view corridors are deceptive and make it impossible for the reader to discern any detailed features in these underexposed photos, much less to understand the impacts on these corridors of the new building which will ‘protrude into the view corridor and diminish the roadway edge of Mason Street’ (page 115). These photos must be replaced with accurate and readable images. These images are completely inadequate to support the DEIR’s subjective judgment that the overall impact on the view corridor would be less than significant. (Pg 122)

“Figure 22 purports to show the views that will be lost, but even this photo is deceptive. The ‘comparative views’ shown in Figures 30 and 31 are very deceptive in that they are midrange views that do not accurately show the impacts of the new building on sensitive scenic views of Telegraph Hill and Sts Peter and Paul Church from Columbus Ave. (near Lombard).

“Additional photos must be added of the views from the Columbus Ave. (near Lombard) at a closer range, similar to the range in Figure 32.

“A series of photos must be added showing views from Cable Cars along Columbus Avenue.

“A previous 3-D computer model developed by the project architect showed what the proposed new building would look like from all angles, included views from along Columbus Ave. looking eastward. This computer model clearly showed that the new building would completely obscure the scenic public views and vistas of Telegraph Hill and Saints Peter and Paul Church. These images were deleted from

public presentations and are included in the DEIR, likely because they accurately depict the significant visual and aesthetic impacts that the project will have on these sensitive views. Please obtain this computer model from the SFPL or its architect and include these images in the final EIR. ...

“The DEIR acknowledges that the existing view of the Transamerica Pyramid, Saints Peter and Paul Church and Coit Tower would be blocked by the proposed library, but concludes that the impact on these scenic public views will somehow be mitigated by the views available out of the “corner windows” of new library. Can the loss of existing scenic public views really be justified in this fashion under CEQA?” (*Vedica Puri, Letter, October 12, 2010*)

“It is going to block – if you stand in the middle of that particular corner and look around, it is called an expansive view; this library is going against the grain of every general policy that San Francisco has put, the view corridors, the expansion views. It is absolutely – it is not in this book.” (*Sal Busalacchi, Public Hearing Transcript, October 7, 2010*)

“There is a view that we talk about from Columbus Avenue through this new triangle that we found, and at great cost to the City and at great expense on the part of the neighborhood to secure. And what that – it’s the neck of a bottle, it lets you look through the part to Coit Tower beyond, to the spires of Saints Peter and Paul, you know where you are, it’s two blocks, this park from Washington Square. One of the ten best urban places in the United States, why wouldn’t you connect yourself to one of the ten best urban places in the United States.” (*Joseph Butler, Public Hearing Transcript, October 7, 2010*)

“The relationship of the master plan in the DEIR to Washington Square is not covered. This is a lost opportunity to create a large green open space with trees open to all (not fenced) and to allow the branch library to be removed from the traffic noise and the tiny sidewalk entrance to the triangle library squeezed next to Columbus Avenue. In addition, the blank wall on the north side of the triangular building is unfriendly to Lombard Street.” (*Zack Stewart, Letter, October 2, 2010*)

“The effect on views would be less-than-significant and the views would be made back by destroying the old library and we would have new views. ...

“This is a misleading statement as no two pieces of property are alike. The effect of putting a building on 701 Lombard Street would cause irreparable damage to the expanse this particular view on this property. Let’s examine the views from the middle of the 701 Lombard Street lot and that of the new view the DEIR says are compatible. A). On the 701 Lombard Street property there is a 360 degree view that you can see, Telegraph Hill, Russian Hill, SS Peter and Paul steeples, Coit Tower, the “Zig Zag” hill on Lombard Street. B). If you destroy the old library we will have a better view of the Edwardian houses on Greenwich Street. We all know, “THAT NO TWO VIEWS ARE ALIKE.” The view on 701 Lombard Street is much better. ...

“Scenic Vistas and View Corridors. The DEIR concludes that: AE-I: Implementation of the North Beach Public Library would not have a substantial adverse effect on scenic vistas or damage scenic resources.’ This is a subjective judgment made by the DEIR rather than an independent presentation of the facts.

“What is the basis for this judgment made by the DEIR? It conflicts with our General Plan that states, ‘EMPHASIS OF THE CHARACTERISTIC PATTERN WHICH GIVES TO THE CITY AND ITS NEIGHBORHOODS AN IMAGE, A SENSE OF PURPOSE, AND A MEANS OF ORIENTATION.’

“San Francisco has an image and character in its city pattern which depend especially upon views, topography, streets, building form and major landscaping. This pattern gives an organization and sense of purpose to the city, denotes the extent and special nature of districts, and identifies and makes prominent the centers of human activity. The pattern also assists in orientation for travel on foot, by automobile and by public transportation.

“The city pattern should be recognized, protected and enhanced. Open spaces with direct views down streets have a greater sense of spaciousness and can be seen more easily from a distance.

“By building a 30 foot tall structure at 701 Lombard the greater sense of spaciousness (360 degree view) will be lost and will not be replaceable as no two properties or views are alike.” (*Sal Busalacchi, Letter, October 12, 2010; Letter, October 7, 2010*) **October 12 comment letter then quotes General Plan policies related to street closure; quotes are not included here, but are addressed in response.**

“The impact on views around and out of the existing area—but also INTO the park space. The proposed building would make the park/playground invisible, or nearly so, from multiple locations outside the park, for example from Columbus Avenue when standing near the proposed structure.” (*Peter Warfield, Executive Director, Library Users Association, E-mail, October 12, 2010*)

“Blocks vistas and views along Columbus and Mason and the environs.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

Response AE-1

The commenters refer to the proposed project’s impacts on scenic views and vistas and view corridors. They state that the project would result in a significant and unavoidable impact to views. Some commenters reference computer models of the proposed library building.

SFPL, SFRPD, and the project architect prepared a simulated walk-through of the proposed library. This walk-through presented both the exterior and interior of the proposed building as would be seen by library visitors. The DEIR, which pursuant to CEQA is concerned with views and visual character as seen from publicly accessible areas surrounding the exterior of the building, includes several figures to convey existing and proposed conditions. As explained on DEIR p. 97, the figures include:

- **Figure 14 through Figure 21** on pp. 104 through 110 show the existing view corridor and visual character of streets bordering the project site, including Columbus Avenue, Lombard Street, Powell Street, and Greenwich Street.
- **Figure 22 and Figure 23**, on page 111, show existing views from the project site.
- **Figure 24 through Figure 29**, on pages 114 through 121, show the Mason Street view corridor, which passes through the project site, in detail from viewpoints at intersecting streets within three blocks in either direction of the project site. [Please note that Figure 27

has been modified, as shown in Section D of this document, to correct a graphical layout error, which placed the conceptual landscaping of the vacated Mason Street right-of-way to the left of its correct location. This change does not affect the analysis or the overall conclusions of the impact of the proposed project on the view corridor; the revised figure is presented on p. C&R-203.]

- **Figure 30 through Figure 32**, on pages 126 through 128, show the existing visual character of the project site and photo-simulations of the proposed project in the context of the surrounding buildings.

The DEIR acknowledges that certain views may be obstructed from specific viewpoints. DEIR Figure 22 on p. 111 shows the view of Coit Tower, Saints Peter and Paul Church, and the Transamerica Pyramid from the intersection of Lombard Street and Columbus Avenue. As stated in the DEIR on p. 123, this view would be blocked by the proposed library. The preparation of an entirely separate figure to show what would be only the façade of the proposed library is not necessary to show that the view would be blocked. The DEIR text adequately conveys the information. Also, the project's impacts to a similar view from the west side of Columbus Avenue are shown in DEIR Figure 31 on p. 127, which shows the most expansive view of the proposed library within the context of the visual resources in the background.

One comment states that the DEIR claims that that new views from the interior, through library windows, would "mitigate" the obstruction discussed above. The DEIR makes no such claim. The DEIR on pp. 123–124, however, does state that the degree of visual obstruction is deemed to be modest and would not rise to the level of significant impact. Commenters state that the blocking of the view shown in Figure 22, across the existing parking lot toward Coit Tower and Saints Peter and Paul Church, would result in a significant impact. While this opinion is noted, it is likewise noted that new views would be created where none currently exist through demolition of the existing library. The DEIR states that new public views of the visual landmarks mentioned above could be created where they do not currently exist. For example, the view of an observer standing on Columbus Avenue or Mason Street is partially obscured by the existing library building, whereas under the proposed project, between about 110 and 130 linear feet of street frontage would no longer be built upon and would instead be landscaped open space, permitting relatively unobstructed views across the playground site to the east.

Moreover, to the extent that the new building would block views of features such as Coit Tower and the Saints Peter and Paul Church steeples, it is also true that these important visual features of the neighborhood would remain visible from the vast majority of locations from which they can currently be seen (such as from Columbus Avenue, as described above). Also, views of other prominent neighborhood features, such as the view of the crooked portion of Lombard Street, would not be affected by the proposed project. Thus, the change in views from one particular location is not judged to be sufficient to rise to the level of significant impact under CEQA.

Regarding the Mason Street View Corridor photos, six separate images of existing and proposed project conditions were presented in the DEIR, presenting the proposed library's impacts on the corridor. These images provide adequate information for the Lead Agency to make a reasonable determination as to the proposed project's impacts to the view corridor. Moreover, as stated in the DEIR on pp. 120 and 122, the changes to the established street wall may be judged by some as

negative, especially for those residents within close proximity to the building. Nonetheless, established focal points and views of scenic resources in the distance would continue to be available, and the impact would be less than significant. Please see Section D of this document, which includes a revised version of Figure 27, p. C&R-203, that places the potential landscaping of the Mason Street right-of-way in the correct location.

Comments regarding “expansion” and “expansive” views are noted. The General Plan Urban Design Element does not include a definition of such views. The proposed project’s impacts to scenic vistas, view corridors, and scenic resources are analyzed in the DEIR. Potential conflicts with the General Plan Urban Design Element are discussed in DEIR Appendix B.

Comments regarding visual connections to Washington Square are noted. The project site cannot be seen from Washington Square due to intervening buildings, vegetation, and topography. Similarly, no views of Washington Square are available from the project site.

Comment AE-2: The EIR is not accurate/not complete in its finding of less-than-significant impacts to visual and aesthetic character of the surrounding neighborhood.

“The HPC believes that the proposed landscape design is suburban in feel and the approach of adding open space to the project site is ill-defined.

“The HPC believes that the DEIR does not adequately analyze the impacts of such a large scale development on a traditionally developed urban environmental context.” (*Charles Chase, Historic Preservation Commission, Letter, October 25, 2010*)

“Ignores fact that the proposed library is a bulky mass with a virtually windowless 120-foot frontage on Columbus, the main North Beach artery.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

“The DEIR concludes that ‘[t]he project would result in less than significant aesthetic effects...but fails to adequately analyze the substantial negative aesthetic affects [sic] of this project on the visual character and quality of the surrounding area, including (1) the aesthetic impacts of the proposed new building on the visual character of the surrounding historic resources and commercial district in which it is located; (2) the project’s impacts on the streetscape by the removal of mature street trees that form part of the historic tree canopy; and (3) the significant aesthetic impacts of the project on sensitive scenic public views and vistas of landmark features of North Beach and Telegraph Hill. ...

“The DEIR is inadequate and incomplete in that there is no analysis of the impact of the proposed large-scale suburban style landscaping on the aesthetic and urban character of the traditional urban space around it. This pointlessly picturesque and unusable landscaping seems really out of place in this location. This potential impact is not addressed in the DEIR. ...

“Include in the DEIR a discussion and analysis of how the proposed new building ‘responds to the context’ as to each of the following:

- (a) The compatibility of the proposed materials and design of the new library to the pool building.

- (b) The compatibility of the proposed materials and design for the new library with the surrounding neighborhood context, including the more immediately proximate historic buildings on Lombard, Columbus, and Powell.
- (c) The relationship of the proposed fenestration of the new library to the window patterns found on Columbus Ave. and in the surrounding neighborhood.
- (d) The footprint and massing of the exterior walls of the proposed new library in relation to the typical building widths and detailing found in the surrounding neighborhood.
- (e) How the form of the sloped roof and pointed corners respond to the context of the surrounding neighborhood architecture. ...

“The DEIR is inadequate and incomplete in that it contains no analysis of the architecture of the new library and its impact on the Columbus Avenue corridor with its virtually uninterrupted, continuous small-scale ground floor commercial spaces, with storefront windows. All new development along the Columbus Avenue corridor and elsewhere in the North Beach NCD is required to maintain this pattern.

“Please include in the DEIR a discussion and analysis of how the proposed new building responds to its context within the North Beach NCD including each of the following:

- (a) The compatibility and relationship of the proposed library design, with its windows located at the three building corners, and only some additional small-scale openings along the façade, to the uniform pattern of storefront windows at the ground floor.
- (b) Given that the proposed new library would be located right on Columbus Ave. (within area of the NB Neighborhood Commercial District), address how the proposed design is compatible with the existing streetscape of the Columbus Avenue corridor composed of small-scale ground floor commercial spaces, which are prohibited in excess of 3,999 sq ft.
- (c) Discuss how the proposed library design is or is not consistent with Commerce and Industry Element Objective 6, Policy 7, which provides:

‘Continuous commercial frontage at the street level is especially important... it prevents the fragmentation and isolation of fringe areas, improves pedestrian accessibility, and enhances the physical and aesthetic cohesiveness of the district.’ (Vedica Puri, Letter, October 12, 2010)

“The unobtrusive Library would be replaced by erecting an obtrusive two-story library of undistinguished design.

“The character of this part of North Beach *obviously* and irrevocably would be changed.

“The costly new two-story library is an inferior design.” (*June Osterberg, Public Hearing Transcript, October 7, 2010*)

“Also, the EIR doesn’t state that the urban design elements say that buildings should be visually interesting and harmonious with the neighborhood. The proposed building is not either one of those.” (*Sue Cauthen, Public Hearing Transcript, October 7, 2010*)

“Not only are they not in the Environmental Impact Report, but I would like to put a picture down here to show you the picture that I got from the library, itself. Now, I took the liberty – this is the actual library that they want to put on Columbus Avenue, and I took the liberty of putting a sign on it, I wanted to put that into perspective, that sign says ‘Walgreens’ because that is how large this particular library is. This library is not in keeping with the neighborhood character, not at all, not one – it does not have any Bay windows, all the bottom that you see there are all walls, there are no windows on the bottom.” (*Sal Busalacchi, Public Hearing Transcript, October 7, 2010*)

“Failure to recognize the new library building is not reflective of the neighborhood.

“The DEIR contains a statement on page 8, LU-3 that, ‘The proposed project would not have a substantial adverse impact on the existing character of the project site of the North Beach neighborhood’ [DEIR pp. 84–85]. Please explain the basis for this statement. This makes no sense at all. Most of the North Beach homes are Edwardian style with bay windows built around 1927. If this building is so pleasing, put it in Washington Square Park where it has the same views and shares the same street. Other than being a triangle, this proposed building is a 30 foot Wal-Mart or Walgreen style building without any ground floor windows and does not fit the neighborhood character in any way.” (*Sal Busalacchi, Letter, October 12, 2010*)

“The DEIR goes on to say that the proposed project would be less-than-significant and the design and construct a project that: Respect the material and visual context of the surrounding neighborhood. With due respect for the ability of the architects on this project, the surrounding area are Edwardians and built around 1927-1937. Scattered about are a few 50’s style homes but most are built with wood slats or stucco. Most have bay windows. This building however does not reflect any part of the North Beach Neighborhood. This building has a thirty foot wall without ground floor windows no stucco, and no wood. This is a building waiting for San Francisco’s graffiti artist to discover its blank canvas.

“I have enclosed two photographs that were taken off the library computer site of its The North Beach Public Library and Joe DiMaggio Playground Master Plan. The only thing I did to put this building into perspective was to add signage. What you will see in both photo’s are that this building is too large and does not reflect anything that characterizes the visual style and age of North Beach or its surrounding space. It is big, intrusive and does not belong on that street. ...

“In conclusion we all want a new library but the cumulative effects that are negative on this project outweigh the positives and this building should never get built.” (*Sal Busalacchi, Letter, October 12, 2010; Letter, October 7, 2010*) ***Comments include rendering of project with a Walgreens sign, which is not presented here but is addressed in response.***

Response AE-2

Commenters express opinions regarding the architecture of the proposed library building, landscaping, and the project’s impact on the surrounding visual character. Commenters do not explain what features of the proposed building and landscaping design makes the project “suburban” or “unusable.” Also, commenters do not state how the “large scale suburban landscaping” would result in adverse aesthetic impacts to the park.” These comments are unsubstantiated opinions, and are noted.

The existing land use character of the project site vicinity is described on DEIR pp. 69–72. The existing visual character of the project site vicinity is described on pp. 97–112. The existing historic resources are described on pp. 134–140. Therefore, the DEIR adequately describes the existing conditions in the vicinity and analyzes the proposed project in this context.

Comments that the proposed building would be “windowless” are incorrect. The building would incorporate large glass windows at its three corners, a bay window on the second floor along the eastern façade, and smaller windows along the eastern and western facades on the ground floor.

The proposed building would contribute to the built pattern along Columbus Avenue. The triangular-shaped building pattern is replicated on other corner lots along the length of Columbus Avenue. The proposed branch library is evaluated in this context. As stated in the DEIR on p. 69–70, Columbus Avenue is characterized by retail uses on the ground floor, and many such uses occupy corner lots. However, these are not the only uses located on triangle corner lots. Other triangle corner lots along Columbus Avenue comprise the following: a three story building occupied by the Church of Scientology (Montgomery Street); a five-story office building with a bank on the ground floor (Jackson Street); a surface parking lot for an auto-repair car storage (Via Bufano); and a three-story building housing the Consulate General of Indonesia (Francisco Street). Also, the existing 701 Lombard Street parcel does not house a retail or café use. It is a surface parking lot.

One of the significance criteria of the EIR aesthetics analysis is whether the proposed project would result in adverse aesthetic impacts on the character of the neighborhood or the vicinity. Impacts to visual character are analyzed in the DEIR on pp. 125–133. The scope of the CEQA analysis does not include determining whether a building is fully or partially compatible with the specific design criteria stated in the comments related to materials and fenestration across a variety of uses. For City properties, this assessment is the purview of the Arts Commission.

The project architect has provided the following description of the proposed design:

As envisioned in the master planning process, the new North Beach Branch Library at 701 Lombard Street is a civic pavilion in the park. A two-story building with double height reading rooms, its mid-block entry sequence would connect to both urban Columbus Avenue and the proposed expanded park at Mason Street. Glazing at the three corners of the building would create a series of urban lanterns while smaller scale openings would provide strong connections to the future expanded park and intimate glimpses from Columbus Avenue. Responding to its site, the design would take advantage of the neighborhood views to the bay, Coit Tower, the spires of Saints Peter and Paul Church, and the Transamerica tower. This new accessible library, with expanded spaces for books, computers, and seating, would provide dedicated spaces for various age groups on its main floor with a program room for both library and community use on the second floor. The proposed removal of the existing library would open additional public vistas and allows the new library to complete this enlarged park block.

Seen as a member of the civic enclave of the park, the library’s massing and articulation would respond to the existing pool and clubhouse buildings in the park as well as to the rhythm, proportion, and patterns of the buildings across Columbus Avenue. Using a composition of panels, glazing, and metal panel, the facades of the building would offer a

modern interpretation of this San Francisco neighborhood context. Ceramic and porcelain tiles are being explored as the principle cladding material for the building. The top of the two-story library would be articulated with a clerestory that runs the perimeter of the double-height reading rooms at its two Columbus Avenue corners. The sloped roof, responding to the context and topography of the site, would allow for the possibility of solar photovoltaic arrays. The project will integrate sustainable design strategies, building systems, and materials, and seek to attain a LEED Silver Certification from the US Green Building Council.

The proposed North Beach Branch Library would complete the space of the park block with the full Master Plan implementation and create a civic space in the neighborhood.¹⁷

As stated above, the proposed project's design is intended to respond to the rhythm, proportion, and patterns of the buildings across Columbus Avenue. For example, the proposed library's roof would slope downward from south to north, similar to Columbus Avenue and the stepped rooflines of the buildings on the west side of the street. Also, the rhythm of window openings in the library's western façade would complement the rhythm of bay windows on the east side of the street.

Regarding the *General Plan* Commerce and Industry Element policies and objectives, the objective cited only states that continuous commercial street frontage is desirable. The objective does not indicate that all commercial strips must contain continuous commercial street frontage. If so, several segments of Columbus Avenue, including Washington Square Park, would physically conflict with this objective. In addition, the existing parking lot, as well as the development of open space at 701 Lombard Street as studied under the Preservation and Southerly Expansion Alternative, would also conflict with this objective if the intent was to state that all commercial corridors should be fully lined with commercial uses on the ground floor. The Planning Department, through *General Plan* Referral, and City Planning Commission will evaluate *General Plan* compatibility through the project approval process.

Regarding the aesthetic impact related to removal of trees, please see the response to comment AE-3, below, which explains that these impacts were determined to be less than significant. The aesthetic and historic character of the project site vicinity is also addressed in response to comment AE-4, on page 105.

Comment AE-3: The EIR's does not adequately analyze the aesthetic impact of the removal of existing trees.

"The DEIR Does Not Adequately Address the Aesthetic Impacts of the Proposed Project on the Visual Character of the Streetscape from the Removal of Existing Trees.

"The DEIR is inadequate and incomplete in that it contains no analysis of the visual and scenic impact of the project to the streetscapes of Columbus Ave. and Lombard St. from removing three mature Indian Laurel fig trees from this prominent location on Columbus Ave. The tree canopies formed by the mature

¹⁷ Aaron Brumo, Leddy Maytum Stacy Architects, Personal Communication with ESA, December 12, 2010.

street trees can be seen in Figures 14 and 17 (although these figures were not included in the DEIR for this purpose).

“The DEIR is inadequate and incomplete in that there is no description of the history of the uniform planting of the now mature Laurel fig trees that form an aesthetic tree canopies along the length of Columbus Ave and on Lombard Street up to Telegraph Hill.

- (a) When were the now mature Laurel fig trees planted on Columbus Ave. and Lombard?
- (b) What is the history of their planting? Provide reference to any streetscape design or plan.
- (c) How many have been lost and what is the cumulative impact of the loss of 3 more of these mature trees on the Columbus Ave. streetscape?
- (d) Why is it necessary to remove these 3 trees for the construction of the new building?
- (e) How could it be designed to avoid the removal of these trees?
- (f) How long will it take for the proposed new replacement trees to ‘*blend the character of the site with the other mature trees along Columbus Avenue*’ as claimed in the DEIR (on page 130)? What kinds of trees are proposed to replace the mature Laurel fig trees?

“The DEIR is inadequate and incomplete in that it does not consider mature Laurel fig trees lining Columbus Ave. and Lombard St. as a visual and scenic resource that will be significantly impacted by the proposed project.” (*Vedica Puri, Letter, October 12, 2010*)

Response AE-3

The commenter refers to the aesthetic impacts of tree removal.

According to the Department of Public Works Bureau of Urban Forestry (BUF) estimates, the trees along Columbus Avenue and Lombard Street were likely planted in the mid-1960s. Lauren Fig trees, which are a species of ficus trees, often have structural issues, and the trees along Columbus Avenue and Lombard Street are fairly typical—each one has some structural issues, but nothing so substantial as to warrant immediate removal. All three trees that surround the 701 Lombard Street parcel have caused substantial sidewalk damage, which is also common of the species. BUF will provide a written evaluation of each tree once it is formally proposed for removal. BUF does not recommend planting with ficus, given the potential for large limb failure and sidewalk damage. Instead, BUF recommends planting Brisbane box trees on Columbus Avenue. BUF has removed ten ficus trees and three liquidambar trees along Columbus Avenue in the last 10 years.¹⁸ Please see responses to comments BI-1 and BI-2, beginning on p. 149, which further discuss street trees.

Concerning the aesthetic effects of tree removal, as stated in the DEIR on p. 37, a total of five trees on the Columbus Avenue, Lombard Street, and Mason Street sidewalks would be removed and replaced with Brisbane box trees, Krauter Vesuvius Cherry Plum trees, and London Plane

¹⁸ Short, Carla, Department of Public Works Bureau of Urban Forestry, personal communication with Mindy Linetzky, Branch Library Improvement Program, December 20, 2010.

Trees, respectively. The street trees surrounding the 701 Lombard Street parcel would be removed because (1) the mature trees' canopies overhang the parcel on the Lombard Street and Columbus Avenue sides, occupying a volume that would comprise a portion of the second floor of the proposed library, (2) the younger trees along Mason Street are within the footprint of the proposed library building, and (3) these trees would be harmed during construction. Street trees can be seen in several "existing conditions" figures in the DEIR, which were meant to convey the views available and existing visual conditions along streets adjacent to the project site.

Figures 24 through 26, on DEIR pages 114 through 117, as well as **Figures 30 through 32** on pages 126 through 128 of the DEIR, show the effect of removal of the street trees.

The proposed project's impacts to visual character through removal of existing trees are discussed in the DEIR on pp. 129–130. As stated there, replacement of existing street trees with younger trees along Columbus Avenue and Mason Street would reduce the greenery and landscaping of the project site in the near term. The visual simulations presented in Figures 30–32 on DEIR pp. 126–128 illustrate the degree of change that would occur associated with removal of trees and replacement with younger vegetation. These new trees would eventually provide a mature canopy that would blend with the surrounding landscaping. London Plane trees grow at about 1.5 feet per year, Brisbane box at between 1 and 1.5 feet per year, and Krauter Vesuvius Cherry Plum at about 1 foot per year.¹⁹ According to the Bureau of Urban Forestry, the canopy could be of a substantial stature in about 10 years.²⁰

As stated in EIR Appendix B, General Plan Urban Design Element 1.5 states that distinctive landscaping gives each neighborhood a special nature, and the proposed Brisbane Box trees and London Plane trees are common throughout the North Beach neighborhood. Also, ultimate tree and landscaping species would require review and approval of the Bureau of Urban Forestry, which would consider compatibility with existing vegetation during its review.

The history of plantings along streets that are adjacent to the project site is not relevant to aesthetic impacts; rather, under CEQA, the appropriate comparison is between existing conditions and conditions with implementation of the proposed project. The existing trees along Columbus Avenue and Lombard Street sidewalks are described in the DEIR on p. 102 and 106, respectively. The proposed project's impacts to surrounding historical resources are discussed under response to comment CP-2, on page 112.

The project-level impact of the removal of street trees has been determined to be less than significant. Regarding the cumulative aesthetic impact of tree removal, as stated in the DEIR on pp. 131–132, the proposed project would not interact with reasonably foreseeable projects in the area so as to result in significant cumulative aesthetic impacts. As stated in the Initial Study (Appendix A of the DEIR) on p. 63, none of the trees to be removed are considered to be rare or endangered, and the biological impacts of removal would be less than significant, with mitigation. Impacts to visual character would also be less than significant. Therefore, given the purpose of alternatives is to avoid or lessen significant impacts, there is no alternative design for the library

¹⁹ Urban Forest Ecosystems Institute, <http://selectree.calpoly.edu/treedetail.lasso?rid=1425>, accessed December 13, 2010.

²⁰ Short, Carla, Department of Public Works Bureau of Urban Forestry, personal communication with Mindy Linetzky, Branch Library Improvement Program, December 20, 2010.

identified to lessen already less-than-significant impact associated with the removal of street trees.

Comment AE-4: The EIR fails to analyze how the proposed project would affect/contrast with the historical character / resources in the project site vicinity.

“Most notably, in its description of the Physical Setting and surrounding neighborhood, the DEIR fails to include an adequate and complete description of the quality of the historic architectural context within which the project is located. Please refer to the architectural description in the North Beach Survey adopted by the Board of Supervisors and revise accordingly. ...

“The DEIR is inadequate and incomplete in that there is no description of the surrounding historic neighborhood and its recognized architectural character and significance. This is missing from the sections of the DEIR describing the environmental setting, the project vicinity and the surrounding neighborhood, and the cultural resources section, as well as the section on aesthetic impacts. ...

“The DEIR is inadequate and incomplete in that there is no analysis of how the proposed design for the new building, including the materials and fenestration, respond to the context of its historical and architectural setting. The DEIR (pg 37) describes the proposed exterior of the library as:

‘A combination of glazing, metal panels, and ceramic or porcelain tiles. Windows would be located at the three building corners, as well as in smaller-scale openings along the façade as well as a small window bay on the second level. The roof would be sloped to respond to the context and topography of the project site.’” (Vedica Puri, Letter, October 12, 2010)

Response AE-4

The comment refers to historic resources in the project site vicinity and states that the DEIR lacks a description of their aesthetic characteristics, as well as how the proposed library design would respond to those aesthetic characteristics.

Please see response to comment AE-2, on page 100, regarding how the proposed library building’s architecture would respond to architecture in the project site vicinity. Regarding neighborhood historic resources, as stated in response to comment CP-2, on page 112, landmark-designated buildings nearby are listed on page 140 of the DEIR, and none are located adjacent to, or across the street from, the project site. Although the tops of some landmark buildings (such as Coit Tower) and other visual landmarks can be seen from the project site vicinity, the architectural detail of these buildings is not immediately juxtaposed with the project site. Therefore, the design of the existing and proposed library does not affect the visual character of these landmarks or their immediate surroundings.

Regarding aesthetic impacts to historic resources in the project site vicinity, as stated on DEIR p. 150, a “substantial adverse change” to a historic resource is defined as “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 Section 15064.5). The proposed project would not result in such physical changes to known or potential historic resources or their immediate surroundings. Therefore, the proposed project would not

affect these historic resources. Impacts to neighborhood historic resources would be less than significant.

Also, as stated in response to comment AE-2, on page 100, the function of the EIR aesthetics analysis is to determine whether the proposed project would result in adverse aesthetic impacts on the character of the neighborhood or the vicinity. The function is not to determine whether a building is fully or partially compatible with the specific design criteria stated in the comments related to materials and fenestration.

Regarding the North Beach Survey, please see response to comment CP-2, on page 112, which states that the project site is not located within any known or potential historic district within the survey area, and no current information is available on which to base a finding of a considerable contribution to a cumulative impact to other resources.

Comment AE-5: The EIR inaccurately describes the style of architecture in the project site vicinity.

“Page 100 (Paragraph 2)—Correct errors—There is no Victorian architecture in North Beach. The primary architecture is Classic Revival. Also, it is primarily pastel, so the reference in the description of “brightly-painted siding” is an additional error. Further, most buildings in the area are not “varied in footprint width” but are much more commonly of uniform width. Someone familiar with the architectural character and history of the area should revise this paragraph.” (*Vedica Puri, Letter, October 12, 2010*)

Response AE-5

The comment refers to the description of the existing visual character of the North Beach neighborhood presented in the DEIR.

In response to comments concerning the architecture and prevailing building colors in North Beach, the first sentence of the second full paragraph on DEIR p. 100 is revised as follows to correctly describe the architecture and building colors in the Washington Square area of North Beach (new text is double-underlined; deleted text is shown in ~~striketrough~~):

Within this area, neighborhood character is forged by the built environment, which contains one-to-four-story buildings (with two-to-three stories most prevalent), generally from the Edwardian era, that exhibit ~~Victorian and Edwardian architecture~~ Classical Revival detailing, with bay windows on the second and third stories, ~~brightly painted~~ pastel-colored siding with contrasting trim lines, and decorative cornices at the skyline.

These edits to the EIR do not change the conclusions of the analysis. Impacts to aesthetics would be less than significant.

The DEIR does not state that “most buildings” in the North Beach neighborhood are varied in footprint width. On p. 100, the DEIR discusses the area around Washington Square and states that buildings are varied in footprint width. This is indeed correct—the built form on the four streets surrounding Washington Square is of larger buildings on larger lots. Moreover, buildings along Columbus Avenue are varied in width along Columbus Avenue—some existing buildings are



wider than the proposed project, although buildings facing Joe DiMaggio Playground are narrower than the proposed new library building's Columbus Avenue facade.

The DEIR actually states that uniform, narrow lots are prevalent (see the inset image from the City's GIS-based mapping

program, SF Viewer, which illustrates lot widths around the playground). DEIR p. 100 states "lots are generally wider on properties along Columbus Avenue than on nearby residential streets. In these cases, building mass is often broken down by architectural elements to respond to the common 25-to-35-foot-wide rhythm common on adjacent streets" (*emphasis added*).

Comment AE-6: Request to graphically depict route of 49-mile scenic drive.

"Please show route of the 49-Mile scenic drive on the Figure 13 View Map." (*Vedica Puri, Letter, October 12, 2010*)

Response AE-6

The comment refers to the 49-mile scenic drive. The route is described in the DEIR on pp. 152 and 153 as passing the project site traveling westward on Lombard Street before turning northward onto Mason Street. The route is intended to be driven in one direction. From these points, the project would not obstruct views of the crooked portion of Lombard Street to the west or the Bay to the north. Please see revised **Figure 13**, which includes a depiction of the 49-mile scenic drive route, included in Section D of this document, p. C&R-204.

Comment AE-7: The EIR inaccurately describes the gateway to North Beach.

"Page 100 (Paragraph 3)—A correct reference to the 'gateway' to North Beach would refer to Columbus and Washington where Columbus Ave. begins. It is generally not considered to begin at Broadway but instead several blocks south at Washington Street." (*Vedica Puri, October 12, 2010*)

Response AE-7

The commenter disagrees with the DEIR's characterization of the intersection of Columbus Avenue with Broadway as the gateway to the North Beach neighborhood. The comment is noted. The Lead Agency acknowledges that visual quality is subjective, including identification of visual gateways. This subjectivity does not change the EIR's conclusions related to the Master Plan's less-than-significant aesthetic impacts, as described in the DEIR on pp. 125–131.

Comment AE-8: The EIR should add a description of Columbus Avenue included in the General Plan Urban Design Element.

“Also in its description of the Physical Setting, the importance of Columbus Avenue should be added from the General Plan. The Urban Design Element, Objective 1, in its “Fundamental Principles for City Patterns” recognizes the importance of views from roadways such as Columbus Avenue where one can enjoy a variety of views from the Bay to the skyscrapers of downtown including the landforms of Russian and Telegraph Hills and such landmarks as Coit Tower, the Church of Saints Peter and Paul and the Transamerica Pyramid. These Fundamental Principles specifically acknowledge Columbus Avenue as a preeminent example of a street that because of its unusual direction gives identity to the district and order to the city's structure. The proposed new building on the triangle parcel would be inconsistent with this principle as would impair views of all of these features.” (*Vedica Puri, Letter, October 12, 2010*)

Response AE-8

The comment refers to the *General Plan's* characterization of Columbus Avenue and the proposed project's impacts to views from that street.

The DEIR on p. 99 states that the *General Plan* defines Columbus Avenue as a “street that defines city form” and a “street area important to urban designed and views.” The diagonal orientation, width, narrow sidewalks, street trees, cobblestone median, and other characteristics are specifically discussed. The *General Plan's* characterization of the streets as one that “defines city form” is further stated in the DEIR on p. 102.

The commenter does not state how the proposed library building, which would be constructed within the existing Columbus Avenue lot line, would impair views along the Columbus Avenue corridor to a greater extent than existing development along Columbus Avenue north and south of the project site. The DEIR inventories views of Coit Tower, Saints Peter and Paul Church, and the Transamerica Pyramid. The analysis found these views to be important in the context of the neighborhood and that they contribute to the visual identity of North Beach. Views through the project site from Columbus Avenue, inclusive of these resources, are described in the DEIR on page 109 and shown in **Figure 22** on page 111. As stated on page 123, this view would be blocked by the new library, but the impact would be less than significant given the availability of other views in the vicinity. Other views along Columbus Avenue would only change within close range of the proposed project site, as shown in DEIR **Figures 30 and 31** on pages 126 and 127.

Comment AE-9: The EIR does not adequately discuss the walls of the Crystal Tower apartments and their relationship to the project.

“The wall a half block west by the high-rise, Crystal Tower, would be carried across Columbus Avenue. The North Beach view corridor would be obliterated. The proposed new library would extend 20 feet into Mason Street. The wide open character of an important Columbus intersection would be gone. An insignificant environmental impact? I don’t think so.” (*June Osterberg, Public Hearing Transcript, October 7, 2010*)

“Bringing the tall wall west on Lombard Street (created by the building of the high-rise Crystal Tower apartments) across Columbus, thus completing the obliteration of North Beach’s famous views and view corridors....The intended two-story library’s footprint would extend almost 20 feet into Mason Street...” (*June Osterberg, Letter, October 12, 2010*)

Response AE-9

The comment refers the walls of the high-rise Crystal Tower Apartment Building at 2140 Taylor Street, which is one block west of the project site. The comment appears to state that construction of the proposed library would result in walls similar to the walls of that apartment building.

The construction of a two-story, 30-foot-tall building, which would be within the range of building heights in the neighborhood as described in response to comment LU-4, on page 77, would not be considered to have a similar impact to views and visual character as the construction of a high-rise building. The proposed library building is simulated in the foreground of **Figure 32** on DEIR p. 128. The Crystal Tower Apartment Building is visible in the background of this view. Therefore, the project’s impacts of views and visual character in combination with the Crystal Tower Apartment Building are adequately represented in the EIR.

Please see responses to comments AE-2, on page 100, and LU-6, on page 80, regarding the project’s impacts to the character of the intersection of Mason Street and Columbus Avenue.

Comment AE-10: The EIR’s characterization of the surface parking lot as a “visual void” is subjective and incorrect.

“The DEIR’s conclusion that a new building on the triangle parcel (regardless of its compatibility with the surroundings) would “fill the visual void” on Columbus Avenue (Page 129) is a completely subjective conclusion that cannot be justified. Under this remarkable line of reasoning, would the construction a building on the edge of Washington Square be justified in order to create a “street wall” on Columbus Avenue ‘to reinforce the diagonal corridor of Columbus Ave’ (Page 129)? Would this DEIR conclude that Washington Square [is] a “visual void” on Columbus Avenue? Is Marini Plaza a ‘visual void’? Are all of the triangular and smaller neighborhood parks in NY City ‘visual voids’?” (*Vedica Puri, Letter, October 12, 2010*)

Response AE-10

The commenter refers to other parks and plazas and states that these areas are not visual voids. The commenter also states that filling a visual void to create a street wall is not justified in parks. The comment is noted.

The DEIR does not state that parks abutting Columbus Avenue are visual voids. DEIR p. 129 states that the existing surface parking lot at 701 Lombard Street, which is analyzed as a parking lot and not open space pursuant to CEQA, is a visual void that would be filled by the proposed library. Please see response to comment PD-1, on page 35, regarding the characterization of the existing parking lot as a parking lot instead of as open space. The parking lot is described as a visual void because a surface parking lot is not an active use or structure designed for use primarily by people, but instead a flat expanse with few visual characteristics or aesthetic qualities designed for use primarily by stationary automobiles.

The compatibility of the proposed library with the surrounding visual character is described in response to comment AE-2, on page 100. The environmental impacts of developing the 701 Lombard Street parcel as open space are described under the Preservation and Southerly Expansion Alternative, beginning on DEIR p. 217.

Cultural Resources

Comment CP-1: The existing Joe DiMaggio Playground is/may be an historic resource and the EIR should analyze it.

“Joe DiMaggio is an ICON—general sense of symbol—i.e. a name, face, picture, edifice or even a person readily recognized as having some well-known significance or embodying certain qualities: one thing, an image or depiction, that represents something else of greater significance through literal or figurative meaning, usually associated with religious, cultural, political, or economic standing. ...

“Joe DiMaggio is a world Icon, Joe DiMaggio is a United States Icon, Joe DiMaggio is a Baseball Icon, Joe DiMaggio is a San Francisco Icon, Joe DiMaggio is a North Beach Icon and lastly Joe DiMaggio is an Italian Heritage Icon who lived and learned to play baseball in our own North Beach playground. ...

“The impact on the Joe DiMaggio playground by reducing the size and removing the implied historic Joe DiMaggio baseball field.” (*Sal Busalacchi, Letters, October 7, 2010; October 12, 2010*)

“The DEIR should have addressed the eligibility for the National Register of Historic Places of both the North Beach Branch Library and the Joe DiMaggio Softball Fields” (*Joseph Butler, Letter, October 12, 2010*)

“The DEIR is inadequate and incomplete in that it fails to evaluate whether the project site itself (the existing North Beach Playground) is a potential historic site. This must be accomplished as a part of this DEIR (page 142) ...

“The last paragraph on Page 152 under the subheading “Historical Architectural Resources” concludes that “[t]he project’s impacts to other features of the project site [other than the historic library building]

would result in less-than-significant impact to historic architectural resources.” As pointed out above, the DEIR is inadequate and incomplete in that it fails to evaluate whether the project site itself-- the North Beach Playground—is a potential historic site eligible for the State or National Registers. Developed in 1903, it is significant to the historic development of the North Beach Neighborhood and is well known for its association with Joe DiMaggio as a child (for which it was named).

“The statement on Page 153 that Phase 2 of the project, which will reorganize and re-landscape the entire park significantly, would have no impact on “architectural” historic resources may be accurate, but it cannot be said that it would have no impact on potential historic resources until an evaluation is made of the historic significance of the park and its association with Joe DiMaggio.” (*Vedica Puri, Letter, October 12, 2010*)

“The DEIR should have addressed the eligibility for the National Register of Historic Places of both the North Beach Branch Library and the Joe DiMaggio Softball Fields.” *Vincent Marsh, San Francisco Preservation Consortium, E-mail, October 12, 2010*)

Response CP-1

The comments state that the Draft EIR fails to analyze the proposed project’s impacts to historic resources related to the Joe DiMaggio Playground itself.

As stated in the Draft EIR on p. 152, as well as in the Historic Resource Evaluation Response (HRER) (Draft EIR Appendix C on page 8), the Joe DiMaggio Playground was developed in 1903 and is significant to the historic development of the North Beach Neighborhood. According to SFRPD, the playground was named after Joe DiMaggio in 1980. Although the playground is named after Joe DiMaggio, this association alone would not justify the playground as a historic resource. For a property to be significant for its association with an important person, the property generally needs to be illustrative of the person’s significant achievements, be associated with the person’s productive life, reflect the time period when the person achieved their historic significance, and not be simply commemorative in nature. In this particular case, the name of the playground does not constitute an association with Joe DiMaggio that rises to the level of significance required for eligibility under Criterion 2/B of the NRHP/CRHP.

According to the HRER (Draft EIR Appendix C on page 8), the playground’s significance lies in its use as recreational space, as a public gathering space, and a space dedicated for use by children and members of the community at large. The proposed project would continue this existing use and would result in a renovated Joe DiMaggio Playground. As stated in the DEIR on pp. 152–153, there are no discernable historic or character-defining aboveground elements that would be adversely affected as part of the undertaking. Therefore, the EIR did not include an analysis of the historic integrity of such features.

As such, the EIR appropriately concludes that the project would result in a less-than-significant impact on the Joe DiMaggio Playground.

Regarding the eligibility of the existing North Beach Branch Library for the National and/or California Register of Historic Places, as well as meeting the criteria for Landmark status, please see Response CP-4.

Comment CP-2: The EIR fails to discuss the proposed project's impacts to nearby historic resources.

“The other big issue is that we felt that the EIR really does not analyze the aesthetics of what is being done to the playground, itself, and wherever the park is on a surrounding context, on the historic resources around it. There is no analysis of the aesthetics of the new library on the historic resources around it; there is absolutely nothing about that. I mean, we’re talking about an existing older neighborhood, and we’re putting in this huge project that is landscaping and a new building, and the extent of the Historic Resources analysis is just about the building they want to tear down, there is nothing about the buildings around it, and how this new landscaping and building is going to affect the resources around it.” (*Alan Martinez, Public Hearing Transcript, October 7, 2010*)

“The DEIR Does Not Adequately Address the Aesthetic Impacts of the Proposed Project on the Visual Character of the Surrounding Historic Resources. The DEIR is inadequate and incomplete in that there is no analysis of the architecture of the new library and its impact on visual character of the historic resources surrounding it. ...

“Although the DEIR mentions in the cultural resources section that the project site is located within the North Beach Survey adopted by the Board of Supervisors, it is inadequate and incomplete in its failure to describe the architectural context of the survey area and to examine the how the architecture of the new library or the proposed large-scale suburban style landscaping plan is compatible with or responds to the context of the historic resources in the survey area. We incorporate the North Beach Survey in its entirety by this reference.

“The DEIR is inadequate and incomplete in that it fails to describe of the Powell Street Shops District located on the west side of Powell between Filbert to Greenwich, which has been determined eligible for the National Register of historic places, and how the architecture of the new library and landscaping plan responds to it. ...

“As stated in our comments on the Aesthetics section of these comments, the DEIR is inadequate and incomplete in its failure to describe the architectural context of the survey area in which the project site is located and in its complete failure to examine the architecture of the new library (as well as the proposed large-scale suburban style landscaping plan) in relation to the surrounding historic architectural resources. Please refer to the adopted architectural description contained in the adopted North Beach Survey and incorporate the survey by reference into the Cultural Resources section of the DEIR.” (*Vedica Puri, Letter, October 12, 2010*)

Response CP-2

The comments state that the Draft EIR fails to discuss how the proposed project would impact historic architectural resources near the project site.

For aesthetic impacts related to neighborhood character, please see Section B of the DEIR, as well as responses to comments AE-1 through AE-10, on pages 96 through 110.

Landmark-designated buildings in the project site vicinity are listed on p. 140 of the Draft EIR. None of these buildings are located adjacent or across the street from the project site. These buildings are separated from the project site by other built forms and styles, and their distance ensures that the proposed project would not affect these resources.

The Powell Street Shops District is one of the potential historic districts in the vicinity that was identified as part of the 1981–82 North Beach Survey of historical resources, which is discussed in the Draft EIR (pp. 142 and 154). The Powell Streets Shops District consists of eight buildings on the west side of the 1800 block of Powell Street, between Filbert and Greenwich Streets. The proposed project does not propose substantial new landscaping in the multipurpose hardscape area, which is the only portion of the site that could be seen when viewing the shops on Powell Street or from viewpoints within this district. This multipurpose hardscape area of the project site would be renovated, but it would appear similar to existing conditions. Recreational uses would remain in the multi-purpose hardscape area, and the visual character of this edge of the project site would remain generally similar to existing conditions. There would be no impact to nearby historic resources through the proposed renovation of the multipurpose hardscape area.

Regarding the North Beach Survey Area, the project site's location within the survey area is stated in the Draft EIR on p. 154, as well as in the Historic Resource Evaluation Response (DEIR Appendix C, page 8). As stated in both documents, the project site is not located within any known or potential historic district within the survey area, and no current information is available on which to base a finding of a considerable contribution to a cumulative impact to other resources.

Comment CP-3: The EIR's conclusions regarding the integrity of other Appleton & Wolfard libraries are incorrect or inconclusive, and further study or corrections to the EIR are required.

“With regards to the Merced Branch Public Library, the HPC does not agree that this library has a high degree of integrity given the scope and extent of the on-going alterations to the building and site. As such, the HPC believes that there will be cumulative impacts to the collection of Appleton and Wolfard libraries as a result of the demolition of the North Beach Library.

“With regard to the discussion of the Multiple Property Listing (pages 145 to 155), the HPC believes that the Ortega Library should not be treated as extant and ineligible given the fact that it has already been demolished. As for the Western Addition and the Excelsior Libraries, the DEIR stated that they are ineligible when in fact, the HPC found them to be eligible at the Oct. 7, 2009 public hearing.” (*Charles Chase, Historic Preservation Commission, Letter, October 25, 2010*)

“And the Draft EIR also states that the Merced Branch has a high degree of integrity; my Commission disagrees with that, that's the one with the addition in front, while the building that they left retains a high degree of integrity. Putting an addition in front, we really feel sort of compromises that which increases

the cumulative impact of demolishing this library because the pool of libraries with integrity, we feel, is smaller than what was stated in the Draft EIR.

“And then, the final point was about the Ortega Branch is treated as if it’s extinct and ineligible, when in fact it’s been demolished, which makes it ineligible, but the reason is that it’s no longer there, not that it might not have been eligible.

“Also, the Western Addition and Excelsior found ineligible in the Draft EIR, whereas our Commission found them eligible. So, those were discrepancies. But I think the biggest points were that we were very dissatisfied with the preservation alternative and how it was handled, and that we felt it was a real lack of analysis of how the landscaping in the new building affected the historic resources around the site, as a whole.” (*Alan Martinez, Public Hearing Transcript, October 7, 2010*)

“Page 144 of the DEIR lists four branch libraries designed by Appleton & Wolfard, which ‘*retain a high level of integrity, according to Planning Department preservation staff.*’ This list contains the Merced Branch Library. Reference is also made on Page 150 to an “assumption” that the Merced Branch will retain its integrity following rehabilitation. However, it is common knowledge and the opinion of the Historic Preservation Commission (HPC), that the Merced Branch will no longer retain integrity following the current rehabilitation. At the HPC’s October 6, 2010 public hearing on the DEIR, Commissioner Wolfram specifically referred to the DEIR’s conclusions regarding the Merced Library renovation and said on the record that the assumption that the Merced Branch Library will retain its integrity following rehabilitation is inaccurate and a subjective opinion. Further, it is yet to be determined whether the Parkside Branch will retain sufficient integrity following its rehabilitation. In order to insure the accuracy and correctness of the EIR and these assumptions, the consulting preservation architect for this EIR should be asked to independently assess the integrity of the Parkside, Merced and Eureka Branches following their respective rehabilitations or current conditions as rehabilitation is underway.

“Please correct the information on pages 144-147 regarding group of Appleton & Wolfard Libraries and add an objective discussion and analysis of the cumulative impacts of the SFPL’s Branch Library Improvement Program (BLIP) on these historic resources. Of the 8 Appleton & Wolfard libraries listed on page 147 relative to their eligibility for contribution to a potential Multiple Property Listing (MPL), the BLIP has demolished one (Ortega) and destroyed the integrity of at least 2 more (Western Addition and Merced). Of the remaining 5, the Excelsior Branch was never been considered eligible for the MPL, which leaves 4 out of the 7 originally eligible branches—Parkside, Marina, Eureka and North Beach. If the BLIP is successful in demolishing the North Beach Library, only 3 of the eligible 7—less than half—will remain, causing a significant cumulative impact on the eligibility of the MPL. This makes the demolition of the North Beach Library, the branch library with the highest level of integrity of the remaining Appleton & Wolfard-designed branch libraries, an even more significant impact.

“References on Pages 144, 148 and 149 to the Ortega Branch Library misstate the facts. At the time the BLIP obtained its permit to demolish the Ortega Library on June 23, 2009, the Planning Department and the SFPL were fully aware that the Ortega Branch was a historic resource because they had received the draft Carey & Co. North Beach Library Historic Resource Evaluation Report dated February 13, 2009, which clearly concluded that the Ortega Branch was a historic resource and was part of a noncontiguous district composed of the remaining Appleton & Wolfard libraries, including the Ortega Branch. Further,

the preservation community made significant efforts to prevent the SFPL from demolishing the historic Ortega Branch, including an appeal of the demolition permit to the SF Board of Appeals. Please correct these misstatements of fact and provide an accurate description of the procedural history of this demolition. If the Planning Department needs further evidence or information to document these facts, we would be happy to provide it.” (*Vedica Puri, Letter, October 12, 2010*)

“We concur with the Historic Preservation Commission (HPC) that the Western Addition (1965), and Excelsior (1966) branch libraries are also eligible for inclusion in the MPL. This should be corrected in the DEIR to adequately evaluate the cumulative impact of demolishing the North Beach Branch Library on the MPL. Most unfortunately, the 1955 Ortega Branch Library was demolished before the MPL could be designated.” (*Vincent Marsh, San Francisco Preservation Consortium, E-mail, October 12, 2010*)

Response CP-3

The comments refer to other branch libraries designed by Appleton & Wolfard architects and question the determinations of historical architectural integrity of those buildings in relation to the potential Multiple Property Listing and cumulative impacts to historic resources.

Regarding the Merced Branch, Planning Department preservation staff found that the library retains a high level of integrity based on a Historic Resource Evaluation Response prepared for that separate project. As stated in the Draft EIR on p. 150, the Merced Branch was being rehabilitated at the time of the preparation of the HPC’s Landmark Designation Case Report, and the ultimate eligibility for the National Register could not be determined at that time. As stated on p. 149, at the time of the publication of the Draft EIR, the HPC had postponed consideration of the Merced Branch until fall 2010. The HPC’s October 6, 2010, meeting, at which it discussed the Merced Branch, was held after publication of the Draft EIR. It is beyond the ability of the Lead Agency, and it would be inappropriate of the Lead Agency, to speculate as to the opinions of the HPC prior to HPC’s meetings. Therefore, the HPC’s analysis of the Merced Branch was not “common knowledge” at the time of publication of the Draft EIR. To update the EIR concerning the HPC’s consideration of the Merced Branch, the first paragraph of DEIR p. 149 is revised as follows (new text is double-underlined; deleted text is shown in ~~striketrough~~):

Separate from the environmental review process being undertaken for the proposed project, on October 7, 2009, the San Francisco Historic Preservation Commission (HPC) initiated designation of landmarks of the Marina, Eureka Valley / Harvey Milk Memorial, North Beach, Western Addition, and Excelsior Branch Libraries. The HPC postponed consideration of the Merced and Parkside Branches until renovations are completed. Fall 2010. In the HPC’s October 25, 2010, comments submitted on the Joe DiMaggio Playground and North Beach Library Master Plan Project Draft EIR, the commission stated that it does not consider the Merced Branch to have a high degree of integrity given the scope and extent of ongoing renovations. In that same comment letter, HPC stated that the addition to the Parkside Branch is compatible with the historic structure.

Regarding the Marina Branch, as stated in the EIR on p. 144, the branch was rehabilitated in 2007 and, based on a site reconnaissance by the Planning Department, the building retains the majority of character-defining features and possesses a high level of integrity.

As stated on p. 144, Planning Department preservation staff found that the Western Addition Branch Library no longer retains a high level of historical integrity due to loss of character-defining features through rehabilitation. The Excelsior Branch was found not to be an excellent example of Appleton & Wolfard's post war, public library design. HPC has not made formal recommendations regarding these buildings, although its Landmark Designation Case Report states that these buildings "clearly fall outside of the Post-War era."²¹

Regarding the Ortega Branch, as stated in the Draft EIR on pp. 144 and 145 in footnote 86, the building was previously evaluated under a separate environmental document, prepared in 2008, and found to be ineligible for the National Register. It was subsequently demolished. Therefore, its eligibility for the National Register was determined by the Lead Agency prior to its demolition. Separately, in the Draft EIR, which was published after demolition of the Ortega Branch, the reason for the branch's ineligibility for the Multiple Property Listing was stated as being due to its demolition.

One comment above, which states that the Carey & Co. report "clearly concluded that the Ortega Branch was a historic resource and was part of a noncontiguous district," is incorrect. The Carey & Co. report included a discussion of the history and design of the Ortega Branch, as well as other branches designed by Appleton & Wolfard, to establish the architects' mid-century library oeuvre. The Carey & Co. report, however, did not evaluate the Ortega Branch under the four criteria for eligibility for the California and National Registers. Moreover, the Carey & Co. report did not discuss cumulative impacts to historic architectural resources, which were determined through the EIR process after completion of the Carey & Co. report. Therefore, the Draft EIR does not "misstate the facts" and the procedural history of the Ortega library's demolition is correctly stated.

Regarding the Parkside Branch, the EIR on p. 144 states that the building was under renovation at the time of preparation of the report, but that it was assumed to retain a high level of integrity.

For all library renovation or replacement projects, the San Francisco Planning Department performs environmental review, pursuant to CEQA, with information available at the time and with any studies it deems necessary. In all cases, as stated in the Draft EIR on p. 154, demolition of the existing North Beach Branch Library would contribute considerably to an adverse cumulative impact on the potential Multiple Property Listing. The EIR therefore takes an adequately conservative approach, and the cumulative impact would be significant and unavoidable. The Lead Agency does not find that additional analysis of other branches is warranted, given that significant and unavoidable impact has already been determined and commensurate findings would be made.

Regarding preservation alternatives, please see responses to comments AL-1 through AL-4, as well as AL-7 through AL-10, starting on page 153.

²¹ Historic Preservation Commission, *Landmark Designation Case Report*, DPR Form 523L, Continuation Sheet (Page 12), March 26, 2010.

Comment CP-4: The EIR fails to adequately discuss that the project would result in demolition of a potential landmark and also fails to adequately describe the actions of the Historic Preservation Commission.

“The North Beach Branch Library is arguably the neighborhood’s best example of mid-century modernism. ...

“The North Beach Branch Library also met the criteria for Landmark status under Article 10 of the Planning Code and was so designated by the HPC on September 1, 2010 which the DEIR should reflect.” *Vincent Marsh, San Francisco Preservation Consortium, E-mail, October 12, 2010*)

“President Miguel and Commissioners, for 45 years, I’ve lived a block from the historic North Beach Library, which should be landmarked, not destroyed. The Draft EIR is riddled with false and shortcomings. I want to address the subjective statements in Chapter 4 that the environmental impact of enacting the Master Plan proposed would be insignificant. Actually, under the plan, the Library is demolished.” *(June Osterberg, Public Hearing Transcript, October 7, 2010)*

“The historic Appleton-Wolford North Beach Library would be demolished rather than landmarked.” *(June Osterberg, Letter, October 12, 2010)*

“Demolition of a Historic Landmark. This project would require the demolition of a building considered part of a group of Appleton-Wolford Libraries that were a first of their kind built in the 50’s. *(Sal Busalacchi, Letter, October 12, 2010)*

“Another thing I wanted to correct before I get to the specifics of the EIR, the evaluations by the Planning Department said that the North Beach Library is the most historic of all the eight Appleton and Wolford Libraries.” *(Sue Cauthen, Public Hearing Transcript, October 7, 2010)*

“The North Beach Branch Library is arguably the neighborhood’s best example of mid-century modernism. The DEIR should have addressed the eligibility for the National Register of Historic Places of both the North Beach Branch Library and the Joe damage Softball Fields. The North Beach Branch Library also met the criteria for Landmark status under Article 10 of the Planning Code and was so designated by the HPC on September 1, 2010 which the DEIR should reflect.” *(Joseph Butler, Letter, October 12, 2010)*

“On Page 142 of the DEIR, there is no reference or description of the Historic Preservation Commission and its authority with regard to the designation of landmarks and historic districts and review of proposed alterations and demolitions thereof. Please refer to the voter approved Proposition amending the SF Charter in this regard, summarize it and incorporate it by reference into the Cultural Resources section of this EIR by reference.” *(Vedica Puri, Letter, October 12, 2010)*

“Large funding, staff efforts and public relations have promoted demolition, rather than a fair public process. The Library’s own Historic Resources Report and the Planning Department determined the North Beach Library to be a significant historic resource. Adhering to federal standards, this was affirmed by independent historians. Later, the Historic Preservation Commission recommended landmarking. ...

“The North Beach Library has the highest architectural integrity of the remaining Appleton-Wolfard Libraries---eligible for the National and State Registers. It is arguably North Beach’s best mid-century modernist building with strong historical and cultural significance. In combination with other North Beach city landmarks, whose lineages date from 1850 to 1933, the Appleton-Wolfard Library continues the thread of neighborhood history.” (*Howard Wong, AIA, E-mail, October 12, 2010*)

“EIR should address fact that plan calls for demolition of a historic resource, one that the Carey & Co. report (commission[ed] by City Planning) speaks of the high architectural integrity of the existing library, stating that it has the most historic integrity of the eight libraries designed by Appleton & Wolfard. Nor does it allude to the library’s eligibility for the California of Historic Resources and the National Register of Historic Places.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

“The North Beach Library is a Historical Resource as defined by CEQA.

“Built in 1959, the North Beach Library encompasses a period of unprecedented national commitment to the development of public library systems and modernization of library services and functions. The building embodies the social and cultural shifts in post-war American library programming and design, and displays an array of character-defining features that dearly distinguishes Appleton & Wolfard’s work within the body of San Francisco’s civic architecture. Each of the firm’s eight branch library designs constructed between 1951 and 1966 express a residential character and scale utilizing natural light, and an appreciation of craftsmanship, color and texture of natural materials. Like the other Appleton & Wolfard branches, simplicity of form, openness and a functional layout are among the North Beach Library’s noteworthy characteristics.

“There is no dispute that the North Beach Library qualifies as a historical resource under CEQA, and its potential demolition would result in a significant and unavoidable adverse impact on the environment. The library has been identified by the San Francisco Planning Department as individually eligible for the National Register of Historic Places and the California Register of Historical Resources under the architecture criterion (C/3); the building was also determined to be individually eligible under the events criterion (A/1) and is eligible for inclusion in a multiple property listing along with four other extant branch libraries designed by the architectural firm of Appleton & Wolfard from 1951 to 1960. On August 31, 2010, the Historic Preservation Commission voted to recommend designation of the North Beach Library as a local landmark.

“The DEIR states that ‘the project site retains excellent integrity in all seven categories: location, setting, design, materials, workmanship, feeling, and association.’ As noted by the HPC, the four other Appleton & Wolfard libraries identified in the DEIR as retaining a high level of integrity (Parkside, Marina, Merced, and Eureka Valley) have all undergone major renovations, leaving the North Beach branch as the only one with the majority of its historic fabric intact.” (*Mike Buhler, Executive Director, San Francisco Architectural Heritage, E-mail, October 12, 2010*)

Response CP-4

The comments state that the North Beach Library building should be designated as a local landmark, that the building meets the criteria for landmark status under Article 10 of the Planning

Code, that the building is the “most historic” of all eight Appleton and Wolfard Libraries, and that the Historic Preservation Commission’s analysis of the project should be included in the Draft EIR.

The properties on the officially adopted local register of City of San Francisco historical resources are listed in Planning Code Article 10, Appendices A through L. The North Beach Branch Library is not listed in these appendices.

The HPC meeting of September 1, 2010, was held after publication of the Draft EIR. At that meeting HPC recommended to the Board of Supervisors, by a vote of 4 to 3, that the building receive landmark designation. Nonetheless, the Board of Supervisors, at its November 9, 2010, meeting, voted 10 to 1 against landmark designation for the North Beach Branch Library. The HPC does not have the power to designate a building a landmark on its own. Therefore, the building is not a local landmark and does not meet the criteria for landmark status. Because the HPC meeting of September 1, 2010, was held after publication of the Draft EIR, the Draft EIR could not have included a discussion of the outcome of that meeting. To update the EIR concerning the City’s consideration, and denial, of landmark status for the library building, the following revisions to the DEIR are made (new text is double-underlined; deleted text is shown in ~~strikethrough~~):

On page 5, the Areas of Controversy to Be Resolved are modified as follows:

On the basis of public comments on the Notice of Preparation of an Environmental Impact Report (NOP), potential areas of controversy and unresolved issues for this project include the demolition of the existing North Beach Branch library, which is a historic architectural resource for the purposes of CEQA that may be landmarked; effects related to the proposed closure of a portion of Mason Street to vehicular traffic; the aesthetic impacts of the proposed new library including obstruction of views; General Plan consistency; and alternatives to the proposed project. These issues are discussed in this EIR.

On page 28, the end of the second paragraph is revised to reflect the outcome of the landmark initiation proceedings:

... Finally, the North Beach Library was the subject of landmark initiation proceedings before the San Francisco Historic Preservation Commission in August and September of 2009 as well as May, June, and July 2010. As further discussed on page 150, the building was denied landmark designation in November 2010.

On page 150, the third paragraph is revised as follows to account for the denial of landmark status to the existing North Beach Branch Library building:

~~The Historic Preservation Commission will consider recommendation of landmark designation for some or all of the Appleton & Wolfard libraries on September 1, 2010. Any recommendation would be reviewed and decided by the Board of Supervisors. At the HPC meeting of September 1, 2010, the HPC recommended to the Board of Supervisors, by a vote of 4 to 3, that the North Beach Branch Library receive landmark designation. Nonetheless, the Board of Supervisors, at its November 9, 2010, meeting, voted 10 to 1 against landmark designation for the North Beach Branch Library. The HPC does not have the power to~~

designate a building a landmark on its own. Therefore, the building is not a local landmark and does not meet the criteria for landmark status.

It should be noted that ~~adoption of landmark designation for the North Beach Library, by itself and/or as part of a potential Multiple Property Listing, would have the denial of landmark designation~~ has no effect on this EIR's consideration of project effects because, as described above, the North Beach Library and documentation of an Appleton & Wolfard libraries potential Multiple Property Listing including the North Beach, Parkside, Marina, Merced, and Eureka Valley / Harvey Milk Memorial branches are considered historical resources for CEQA purposes.

Nowhere in the DEIR does it state that the North Beach Branch Library retains the "highest" or "best" level of historical integrity, is the best example of post-war modern library design, or is otherwise the "most historic" of the eight Appleton & Wolfard libraries. The Historic Resource Evaluation Response prepared by Planning Department staff, on page 5, indicates that the building retains a high level of integrity and that it meets the criteria for designation, but staff does not assign a value judgment on the design. Similarly, the DEIR, on p. 143, states that the building retains a "high" level of integrity. Page 23 of the Carey & Co. report, under Criterion C/3, specifically states, "One can argue that the North Beach Branch is not the best library designed by Appleton & Wolfard."

Even though the City did not designate the building as a local landmark, the DEIR appropriately found the library eligible for listing on the National and California Registers for purposes of environmental review. As stated on p. 148 of the DEIR, the existing North Beach Branch Library is considered a historical resource for the purposes of CEQA because it meets age-eligibility requirements, was found, as part of the project-specific historical resources analysis, to be associated with important events, and displays a number of character-defining features that reflect the shift in library design in the post-World-War-II period, as well as it retains sufficient integrity to convey its historicity. In sum, the building was found eligible for listing in the National Register of Historic Places and the California Register of Historical Resources by both the Planning Department's historic resources consultant and by Planning Department preservation staff, and is therefore considered a historical resource for purposes of CEQA analysis. Its demolition would result in significant and unavoidable impacts to historical architectural resources, both individually and cumulatively.

Comments regarding public relations and staff efforts are noted. They are beyond the scope of CEQA.

Comment CP-5: The North Beach Library is not a historic resource worthy of preservation.

"As the Associate Architect and Interior Designer for the recently remodeled Parkside Branch-another Appleton and Wolford library-I can say that I know these buildings. Parkside is lovely and we were able to apply a light touch to its updating and expansion. North Beach simply does not rise to the level of Landmark status and should not be preserved to the detriment of community services and open space."
(Karin Payson, Letter, October 8, 2010)

“While the HPC has recommended landmarking the building, there remains genuine dissent in the architectural community as to the worthiness of this building for such consideration. It is important to know that demolition would not erase the building from history. Apart from better examples from the same architects renovated by the library, there is an accepted approach to documentation of the building that would commit it to the record for future generations.” (*Charles A. Higuera, FAIA, E-mail, October 12, 2010*)

“I understand the importance of historical building preservation and have supported this effort in the past. In my professional opinion, as a practicing architect, that the North Beach Library has few significant architectural merits to warrant its preservation. The design is a typical product of the 60’s and not a very good one at that. Just because the design is reflective of a period design doesn’t mean it deserved to be preserved. The building exterior turns its back on the street with an imposing brick wall with few window openings. It does not respond to or embrace the street or neighborhood. It was shoehorned in its location without any relationship to the surrounding area.” (*Ed Choi, AIA, E-mail, October 4, 2010*)

“The EIR states that tearing down the building would be a significant impact, but that is only if the building were deserving of landmark status, which, with all due respect to the Historic Preservation Commission, it just simply is not. Absent the landmark issue, the environmental impacts of the new project would not be significant, so I urge you to approve the EIR.” (*Howard Chabner, Public Hearing Transcript, October 7, 2010*)

“It stated that although the existing library is a historic resource, there are six other Appleton Woford libraries that will remain as part of the historical San Francisco urban fabric .We need a new library in North Beach because the existing one is too small and no history will be lost as there are better examples of this type of architecture in the city.” (*Jennifer Vazquez, E-mail, September 27, 2010*)

“And as an architect who has worked on the Parkside Branch, which is about to open, I can also say that I am familiar with Appleton and Woford and that is a really lovely building. I don’t know that the North Beach Branch really rises to the level of landmark status.” (*Karin Payson, Public Hearing Transcript, October 7, 2010*)

“There is more than adequate information that there are no significant impacts, with the single exception of the highly questionable preservation of the existing structure. Demolition of what is arguably the worst example of the 1950 style of architecture is easily mitigated by a memorial photographic and narrative display in the new library.” (*Lee Goodin, Letter, October 7, 2010*)

“I was involved in two library renovation projects, the Richmond Branch and the Anza Branch – Richmond is finished, Anza is in progress – as well as the Potrero Hill Branch, which is finished and gorgeous. I am not a Historic Preservationist expert by any manner or means; I have taken a look at, very purposefully because of this, of the various Appleton Woford branches. In my non-professional opinion, this is perhaps the least of their efforts that is still remaining, not everything the best of international architects does is necessarily worth saving for posterity.” (*Commission President Miguel, Public Hearing Transcript, October 7, 2010*)

“From what I understand one of most significant derailing arguments currently being made by the ‘Conoscenti’ is that the Library is a historic resource that should be preserved. I know we all generally

know what ‘Conoscenti’ means, but I wanted to check the spelling and the definition I ran across just fit so well that I will repeat it here ... *persons who have superior knowledge and understanding of a particular field, esp. in the fine arts, literature, and world of fashion.*

“Well I too have a knowledge of these things, having attended school in Rome Italy at ICCROM. ICCROM is an international center for the study of the preservation and restoration of Cultural property.

“Since the existing library building is clearly not an Architectural gem, it is at best a building representing the cultural heritage of a blip in time. The fallacy of this argument is that this blip in time, the expansion to the suburbs and the automobile have absolutely nothing to do with North Beach. In other neighborhoods the argument could be made, but it is an extremely weak argument when one looks at North Beach, the turn of the century central City neighborhood made up of Italian and Chinese Immigrants” (*Brent McDonald, E-mail, October 5, 2010*)

“In any event, I trust the Planning Commission can see the effort to block the adoption of the EIR and create an ‘historic district’ for what it really is: a last-ditch scheme by opponents of the North Beach park and library project to bring it to a screeching halt.

“If people were truly interested in preserving the library as an historical landmark, then why have they waited so long to bring this issue before the Historic Preservation Commission? Efforts to revamp this patch of land have been ongoing for nearly seven years. Yet only recently have opponents of the project begun claiming that this cramped, musty, dingy place is historical. After losing round after round at various City entities, these opponents are now hoping to use the Planning Commission as a pawn in their efforts to stop a project that will modernize our library and park.

“Please do not stall the EIR at the behest of these naysayers.

“As for the building itself, its architectural and historical significance is questionable at best. It is dingy and dark, with very little natural light. The wall facing Mason Street is basically a huge concrete slab that adds nothing to the surrounding landscape. When my children and I use the North Beach Library, we hurry in and find our books, check them out, and leave. We do not stop to admire it as an architectural wonder. There are, of course, many buildings deserving of historical preservation in San Francisco, but those who have visited the North Beach Library cannot with a straight face count this structure among them. In addition, the building is a nightmare to navigate with a stroller (and, likewise, a wheelchair).” (*Lisa Bowman, E-mail, October 6, 2010*)

“Some seem to think that the existing library building is an historic architectural resource and apparently have proposed, as described in the draft EIR, a ‘Preservation and Rehabilitation Alternative.’ Such a proposal is attempting to preserve what is a painfully regressive, quite ordinary building. We encourage demolition of the structure rather than trying to mitigate the effect of its demolition. It is difficult to fathom why its preservation might call up any support. San Franciscans and our community deserve better.” (*David Martin, E-mail, October 7, 2010*)

“As someone who loves the historic architecture of San Francisco, I do not experience the old library as a contributor to the historic fabric of an urban community. In fact, it stands against it and it needs to be torn down.” (*Lawrence Li, E-mail, October 6, 2010*)

Response CP-5

The comments state that the existing North Beach Branch library is not deserving of landmark status or that the building is not a good example of mid-century modern library design.

As stated in the Draft EIR on pages 143 through 148, the building incorporated library theories, practices, and programming that were modern at its time of construction in the mid-20th Century, and it retains a high level of integrity. The Planning Department has determined, for purposes of environmental review, that the building is eligible for the California Register of Historical Resources under Criterion A because it conveys a broad trend of post-war library programming and design, as well as under Criterion C because it embodies the principles of the library design of that period and displays character-defining features that clearly distinguish the work of Appleton & Wolfard during that period, including residential character and scale and incorporation of natural light, among others. Please see the Historic Resource Evaluation Response in Appendix C of the Draft EIR, which provides a list of character-defining features on p. 7. Therefore, the building is considered a potential historical resource solely for the purposes of the EIR, and its demolition would result in significant and unavoidable impacts to historical architectural resources.

In a separate action, the Board of Supervisors, at its November 9, 2010, meeting, voted against landmark designation for the North Beach Branch Library building. Therefore, the building is not considered a locally designated landmark.

Comment CP-6: The historic integrity of the North Beach Library cannot be determined because the existing building has been badly maintained.

“The Building Maintenance expert [whom I consulted] says that the Appleton has been very badly maintained and can’t be judged by its present looks.” (*Zack Stewart, Public Hearing Transcript, October 7, 2010*)

Response CP-6

The comment appears to refer to the historic architectural integrity of the existing North Beach Branch Library. As stated on Draft EIR p. 143 and in the Historic Resource Evaluation Response (DEIR Appendix C, pages 5 and 6), the building retains a high level of integrity, though it has undergone some alterations. The alterations are reversible and do not detract from the overall character of the building. As stated on p. 148, the building has architectural merit and a high level of physical integrity. The Draft EIR does not judge the building to lack integrity due to needed repairs. As stated above, in response to comment CP-5, on page 123, the building was determined to continue to convey the character-defining features that justify its eligibility for listing on the California Register, and it is considered a potential historic resource for purposes of the EIR.

Comment CP-7: The EIR incorrectly characterizes some historic surveys.

“On Page 143, the DEIR states that surveys that are not recognized by the San Francisco Planning Department as adopted local registers of historical resources are not surveys for CEQA purposes. That is incorrect under CEQA, which applies to any resource that may be eligible for listing on the California

Register whether or not the City has adopted a survey that has identified the resource. Please correct this misstatement of the requirements of CEQA.” (*Vedica Puri, Letter, October 12, 2010*)

Response CP-7

The comment refers to surveys of historical resources and the definition of adopted local registers of historical resources.

As stated in the Draft EIR on p. 140, CEQA *Guidelines* section 15064.5(a)(3) defines what constitutes a historical resource under CEQA, and the Planning Department has grouped historical resources and potential resources into three categories. Category A.2 includes all properties listed on *adopted* local registers and properties that may become eligible for the California Register (emphasis added). The properties on the officially adopted local register of City of San Francisco historical resources are listed in Planning Code Article 10, Appendices A through L.

The Draft EIR on page 143 states that other historical resources surveys, such as the *San Francisco Architectural Heritage Survey*, are not recognized by the San Francisco Planning Department as “adopted local registers of historical resources” for CEQA purposes because these surveys are not the officially adopted local register.

The Draft EIR makes no claim that properties listed on these other surveys could not be historic resources under CEQA. To the contrary, as discussed on pp. 140 and 141, the Department’s Category B includes properties that may require further consultation and review even if they are not listed on the adopted local register of historic resources.

Please note that at the November 9, 2010, Board of Supervisors meetings, the Supervisors voted against landmark designation of the existing North Beach Branch Library. Nonetheless, the EIR identifies the building as a potential historical resource for CEQA purposes.

Comment CP-8: The EIR inadequately discusses the proposed project’s impacts to archaeological resources.

“On Page 151, the DEIR does not describe or provide any information at all as to what the potential is for affecting significant archeological resources—only a footnote reference to a report by Randal Dean and Don Lewis of the Planning Department. Please revise this section of the DEIR to include a summary of the findings in the referenced report so the reader can understand why and how the impacts could be significant. This is necessary in light of the fact that mitigation measures are proposed. The reader should understand what is being mitigated without having to go to the planning department to find and read a separate study.” (*Vedica Puri, Letter, October 12, 2010*)

Response CP-8

The comment requests that the Draft EIR include a summary of findings of an archaeological study prepared by the Planning Department, which is referenced on p. 151 of the Draft EIR.

Studies and appendices to the EIR comprise the administrative record of the EIR. These documents need not be included in order to allow the EIR to be readily understood by decision makers and the public. As stated in *CEQA Guidelines* Section 15147, “the information in the EIR shall include summarized technical data. ... Placement of highly technical and specialized analysis and data in the body of the EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR.”

It is therefore common for environmental analyses to reference other studies that are held on file at the Planning Department. For example, the transportation impact study prepared for the proposed project is also referenced via footnote. The EIR is not meant to be an exhaustive discussion of every detail of each study, but instead a complete analysis of environmental impacts informed by these studies, as well as by separate analysis. A thorough summary of the archaeological study is provided in the Draft EIR on pages 134–135 (setting) and p. 151–152 (impacts). Impacts to archaeological resources were determined to be potentially significant, but mitigated to a less-than-significant level with implementation of Mitigation Measure M-CP-1, which requires consultation of an archeological consultant in the case of accidental discovery during soils-disturbing activity.

Comment CP-9: The HPC concurs with the San Francisco Architectural Heritage’s comments made at the HPC hearing regarding the Draft EIR.

“The HPC concurs with the comments made by Mike Buhler, Executive Director of San Francisco Architectural Heritage at the hearing regarding the DEIR.” (*Charles Chase, Historic Preservation Commission, Letter, October 25, 2010*)

Response CP-9

Mr. Buhler submitted written comments on the Draft EIR, which are responded to in the following responses to comments: CP-4 (page 118), AL-1 (page 153), AL-3 (page 164), AL-4 (page 173), and AL-7 (page 180). Comments made by Mr. Buhler before the Historic Preservation Commission at its October 6, 2010, hearing are assumed to be summarized by the HPC in its comments on the Draft EIR. Those comments, including both testimony at the October 7, 2010, hearing by Commissioner Martinez, as well as a letter by Charles Chase dated October 25, 2010, are included and addressed in this document.

Comment CP-10: Approval of demolition of the existing library requires the City to make findings that alternatives and/or mitigation measures are not feasible.

“The proposed Project would demolish the North Beach Branch Library. CEQA contains a ‘substantive mandate’ that public agencies refrain from approving projects with significant environmental effects if ‘there are feasible alternatives or mitigation measures that can substantially lessen or avoid those effects. Feasible means capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, environmental, social and technological factors.

“CEQA’s requirement that there be no feasible alternative to, or mitigation of, the demolition of an historic building is a central feature of environmental protection law. Even if the decision-making agency

believes the proposed Project would be beneficial, and has a strong policy preference for the Project, the agency may not ‘approve or carry out’ a Project for which significant and unavoidable environmental impacts have been identified without making specific findings about alternatives and mitigation measures that demonstrate the Project’s harm to an historic building is not feasibly avoidable.” (*Vincent Marsh, San Francisco Preservation Consortium, E-mail, October 12, 2010*)

Response CP-10

The comment refers to environmental findings. It states that an agency, which is the City in this case, may not approve demolition of historic resources without making specific findings about alternatives and mitigation measures. The comment states that these findings should state that the project’s harm to a historic building is not “feasibly avoidable.”

As stated on Draft EIR page 19, “CEQA requires that agencies shall neither approve nor implement a project unless the project’s significant environmental effects have been reduced to a less-than-significant level, essentially ‘eliminating, avoiding, or substantially lessening’ the potentially significant impacts, except when certain findings are made. If an agency approves a project that will result in the occurrence of significant adverse impacts that cannot be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing, demonstrate that its action is based on the EIR.”

As stated in CEQA Guidelines Section 15093, CEQA requires the decision-making agency to “balance” applicable economic, legal, social, technological, and other benefits of proposed projects. If such benefits outweigh the projects’ unavoidable adverse environmental effects, the adverse effects may be considered “acceptable,” and the agency shall state in writing the specific reasons to support the action. This statement of overriding considerations shall be supported by substantial evidence in the record.

Findings are made, where applicable, by the lead agency at the time a project is considered for approval. They are based, in part, on the CEQA document—the EIR, in this case—as well as other information in the administrative record. Findings are not part of the EIR itself.

Comment CP-11: The HPC hearing regarding the Draft EIR was not scheduled far enough in advance of the Planning Commission hearing on the Draft EIR.

“As we specifically discussed in our recent meeting in Supervisor Alioto Pier’s office on the Chapter 31 amendments, an important procedural issue related to the right of the Historic Preservation Commission (per the Charter) to review a draft EIR, is to schedule the HPC hearing sufficiently prior to the Planning Commission hearing so that the HPC’s written comments will be available to the PC and the public at the PC hearing.

“In this regard, we had proposed the following changes to Section 31.14(a):

‘In the event the project which is the subject of an EIR may affect any historic resource as defined by CEQA, and/or the EIR discusses potential impacts on historic resources, the Environmental Review Officer shall send a copy of the draft EIR to the Historic Preservation Commission for

review and comment, and shall schedule a public hearing before the Historic Preservation Commission at least ten (10) days prior to the holding of any hearing on the draft EIR to provide adequate time for the Historic Preservation Commission to provide its written comments on the draft EIR in order that they may be available at the public hearing.’

“I understood that we were all in agreement that this needed to be addressed. Unfortunately, we have a situation this week that is the perfect example of what is not working. The Planning Department has scheduled hearings at both the HPC and Planning Commission back-to-back on the North Beach Library DEIR, which involves the proposed demolition of a historic resource which the HPC has recommended for landmark designation.

“Why was it necessary to schedule these 2 hearings for the same week?

“Obviously, there is no possible way for the HPC comments on Wednesday afternoon to be committed to writing and made available to the public and Planning Commissioners before a hearing on the very next day. This is exactly the type of situation that our proposed amendments to Ch 31 were intended to address.” (*Nancy Shanahan, E-mail, October 5, 2010*)

Response CP-11

The “proposed changes” to Chapter 31 of the San Francisco Administrative Code referenced by the commenter have not been approved by the Board of Supervisors and therefore are not part of the Code, nor were they in effect at the time the Draft EIR was published and the public hearings held before the HPC and the Planning Commission. Under the proposed legislation (Board of Supervisors File No. 100495), the HPC public hearing would have to be scheduled at least 8 days prior to the Planning Commission public hearing on a Draft EIR. The comment states that that Historic Preservation Commission (HPC) hearing regarding the Draft EIR, which was held on October 6, 2010, was not held far enough in advance of the Planning Commission public hearing on the Draft EIR, which was held on October 7, 2010.²²

In the case of the proposed project, as stated on the cover of the Draft EIR, which was published on August 25, 2010, the Planning Commission’s public hearing was scheduled on October 7, 2010, more than 30 days after notice of the hearing was provided (concurrent with publication of the Draft EIR), as required by Chapter 31 of the Administrative Code. Also, the date of the Planning Commission’s public hearing was advertised in the Notice of Availability sent to local property owners, on signs posted throughout the neighborhood, and the city’s website.

Historic Preservation Commissioner Alan Martinez attended the Planning Commission hearing on October 7, 2010, and provided comments from the Historic Preservation Commission. Charles Chase, the Historic Preservation Commission President, submitted a comment letter regarding the DEIR, and the comments from that letter are addressed in this document.

²² The HPC, which typically meets twice monthly, did not hold a regular meeting the previous week, on September 29, 2010 (although a special meeting was held to continue then-ongoing discussions concerning amendments of Planning Code Articles 10 and 11, concerning historical resources).

Transportation and Circulation

Comment TR-1: The EIR analysis purposefully ignored studies related to the July 2009 traffic levels of service at the intersection of Stockton Street, Green Street, and Columbus Avenue.

“But I just want to read this one thing, it is on the bottom of page 167: “In the professional opinion of City staff and the consultant, the LOS E,” I don’t know what that stands for, but, “...the LOS E condition calculated using the traffic volumes collected in July of 2009 is not an accurate characterization of prevailing conditions.” In other words, the staff decided they didn’t want to use that, and so they didn’t. I am sending you a longer statement of my objections to the EIR, in which you will see some more detail about traffic studies that are not in here.” (*Joan Wood, Public Hearing Transcript, October 7, 2010*)

“With regard to the effects on the neighborhood of closure of Mason Street, which is intrinsic to the Master Plan although not yet permitted. Traffic studies are referenced on page 167. Strangely, the details provided here refer to traffic patterns at an intersection 4 blocks away at Stockton, Green, and Columbus and not the relevant chart on the following page. There was an earlier study done in December, 2005 by MTA which is not mentioned at all, and tellingly, there is reference to a staff decision to ignore a study of July 2009 traffic which seemed inconsistent to the planners!” (*Joan Wood, Letter, October 12, 2010*)

Response TR-1

Footnote 104 on p. 167 of the Draft EIR provides evidence in support of information in Table 8 (summary of intersection level of service [LOS] at study intersections), and the LOS C condition at the intersection of Columbus Avenue / Stockton Street / Green Street. As stated in that footnote, LOS determinations based on traffic counts conducted for various recent traffic analysis studies (2007-2010) all indicated LOS C conditions during the weekday p.m. peak hour at the Columbus/Stockton/Green intersection. In addition, following standard practices used by traffic analysts, field observations were made during the analysis hour on multiple occasions to corroborate the calculated LOS. Those field observations by transportation planners/engineers from the City and the consultant support a LOS C finding.

The decision to not use the LOS E calculated using a traffic count in July 2009 as representative of typical conditions at that intersection was not arbitrary or self-serving because all evidence pointed to the fact that the July 2009 count was not representative of typical conditions. As stated in this footnote, a review of the recent traffic counts (July 2008, July 2009, and September 2009) revealed general consistency among the turning movement volumes, except on two movements on southbound Columbus Avenue, which were inconsistently high during the July 2009 count compared to the other counts. Traffic volumes, by their nature, fluctuate (daily, seasonally), and some variations between traffic counts are expected, but the above-cited consistency among the other counts, other LOS determinations, and multiple field observations made it clear to City staff that the July 2009 p.m. peak-hour traffic volumes count represents an anomaly in typical p.m. peak-hour operations at this intersection.

In summary, the level of service for the Columbus Avenue / Stockton Street / Green Street intersection has been calculated four times from 2007 to 2010, and all but one calculation showed

a LOS C at this study intersection. Given this data, staff carefully reexamined the data collected in July of 2009 and determined that it did not represent typical conditions as reflected in all the other data collection efforts as well as numerous observations at this study intersection. Furthermore, the correction to the level of service is made for the Existing Conditions scenario not for the Existing Plus Project scenario, which shows the intersection of Columbus Avenue / Stockton Street / Green Street operating at LOS C (with the project adding only four vehicles, on Columbus Avenue, during the weekday p.m. peak hour). Even if this intersection operated at LOS E under Existing Conditions, the proposed project's minimal vehicle trip generation would not result in a significant project-specific or cumulative impact during the p.m. peak hour. In other words, staff's decision to correct the service level from LOS E to LOS C under Existing Conditions would not change any of the conclusions reached in the EIR.

For a discussion of other traffic studies prepared prior to the July 2009 Mason Street temporary closure, please see response to Comment TR-2, on page 130.

Comment TR-2: Other transportation studies have been prepared for Mason Street, and they found that closing Mason Street would result in a substantial recirculation of traffic that may result in significant impacts.

"The transportation analysis is lengthy and it has one interesting conclusion, page 167, it refers to five different dates of transportation studies, but there was a study in December of '05 commissioned by the MTA, and it is not referred to any place, and it found serious traffic on Mason Street, which would obviously be diverted if the street were closed, which it would be if the Master Plan were implemented." (Joan Wood, *Public Hearing Transcript, October 7, 2010*)

"The Dec 2005 study counted 5,000 to 6,000 cars daily along Mason Street. I have enclosed WEC's Environmental and Engineering Consultants' report commissioned privately in May, 2009 which found 7,000 to 12,000 cars in the Mason/Lombard corridor in July and August of 2008—tourist season. This is a 6-page, detailed study which also considered studies of San Francisco traffic from 1995 forward and concluded that Columbus Avenue will have additional traffic of about 250% from the spillover effect of closing Mason Street." (Joan Wood, *Letter, October, 12, 2010*)

"But what I'm upset about the EIR is that it ignores so many of the impacts. It talks about an insignificant impact from street closure. That is not true at all. A traffic study done in December of 2005 showed an enormous traffic impact, for some reason this didn't make it into the EIR, and it should make it into a revised EIR." (Sue Cauthen, *Public Hearing Transcript, October 7, 2010*)

"At this point, I would like to mention the fact that there is a traffic study which I gave you, there are two traffic studies there that are not in the Environmental Impact Report." (Sal Busalacchi, *Public Hearing Transcript, October 7, 2010*)

"Not recognizing the original traffic study that was done in 2004 as well as a 2009 environmental study linked to traffic congestions. ...

"Transportation and Circulation: (page 11. TR-1, TR-2, TR-4) The DEIR Does Not Adequately Address or Analyze Impacts on Transportation and Circulation.

“The DEIR concludes that, “Less than Significant impact would occur,” from the proposed project, but fails to disclose the two traffic studies done that is inconsistent with the staff observations collected in 2008 and 2009 without any mechanical methods used to do an exact count. The traffic studies were done in part by library staff that could be considered subjective. The 2005 Study (below) that was done by MTA with mechanical count devices attached to the street for a week. Jerry Robbins from MTA 5 day mechanical study (attached) PM peak hour’s 500-600 vehicles will not change even if Mason Street is closed at Lombard Street. ...

“There were two other studies that were never mentioned. Supervisor Aaron Peskin asked for a street closure study that was done in December by San Francisco County Transportation Authority. The DEIR concludes that, “Less than Significant impact would occur,” from the proposed project, but fails to disclose the two traffic studies done that is inconsistent with the staff observations collected in 2008 and 2009. No mechanical methods were used to do an exact count. The traffic studies were done in part by library staff that could be considered subjective. The 2005 Study (below) that was done by San Francisco County Transportation Authority with mechanical count devices attached to the street for a week. Jerry Robbins from MTA 5 day mechanical study (attached) PM peak hours 500-600 vehicles will not change even if Mason Street is closed at Lombard Street. Studies show an increase of 1-2% since 2005 and will climb until 2030.

“The second study done by WEC Environmental and Engineering Consultants (attached) paints a bleaker picture where the increased traffic congestion will increase the risk of air pollutants to residents and tourist, and as well leave the San Francisco’s North Beach area in non compliance. This study also states that the spillover traffic over to the adjacent artery Columbus Street would cause 250% traffic congestion as a result of the Mason Street closure plans. Furthermore, there is no mention that Mason Street is classified as a secondary arterial and supplements Columbus Avenue and Powell Street. Closure of Mason Street would cause major traffic congestion in our neighborhood and would cause problems for emergency vehicles.” (*Sal Busalacchi, Letters, October 7, 2010; October 12, 2010*)

“Ignores 12/05 transportation study that speaks to the heavy traffic along Mason Street.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

Response TR-2

The 2005 “study” referenced in the comments was in fact a collection of traffic counts on Mason Street, conducted by the San Francisco Municipal Transportation Agency (SFMTA), using a traffic counting machine (with a tube across the street) in December 2005. Neither the SFMTA nor the Planning Department performed a traffic analysis of the data collected in 2005 to determine whether the closure of Mason Streets would result in impacts, as defined by CEQA. As such, the comment that the 2005 counts “showed an enormous traffic impact” is the commenter’s opinion, not the judgment reported by SFMTA at the time.²³

²³ It is worth noting that the tube counts collected in 2005 by SFMTA would not represent sufficient data to analyze the impacts of closure of Mason Street. The sole purpose of the tube counts is to gauge the volume of vehicles on a particular roadway. In order to analyze traffic impacts, turning movement counts would also need to be collected, as was done for the proposed project.

Unlike the counts collected by SFMTA in 2005, the DEIR included a comprehensive Transportation Impact Study. Contrary to the commenters' statement, multi-day traffic volume counts were conducted using the same method as used by the SFMTA in 2005; i.e., a traffic counting machine (with a tube across the street). In addition to collecting tube counts, the Planning Department collected turning movement counts and conducted numerous field observations (on at least 20 days) prior to and during the temporary closure of Mason Street. The traffic studies were done by transportation planners and engineers, not by library staff.

As described in the DEIR, analysis of street geometry and traffic volumes/patterns (existing, with the project, and under cumulative conditions) concluded that the proposed project would result in minor changes to the average vehicle delay at the intersections in the project area, and all of the intersections would continue to operate satisfactorily. The effect of closing Mason Street to vehicular traffic between Columbus Avenue and Lombard Street would have a less-than-significant (not "insignificant", as claimed by a commenter) impact on the surrounding roadway network.

The reason the DEIR did not make use of, or cite, the December 2005 traffic count data is that, consistent with standard traffic analysis practices (and the San Francisco Planning Department's *Transportation Impact Analysis Guidelines for Environmental Review*), new traffic counts should be conducted to capture the baseline conditions (except in areas without recent changes in traffic patterns or traffic volumes, where counts collected within the last one or two years could be used in lieu of new counts). Count data more than two years old is not to be used unless there are extenuating circumstances. No such extenuating circumstances exist for the proposed project.

The commenter refers to a WEC Environmental Engineering and Consulting document as a traffic study. While this six-page document lists some traffic data, amongst other information, it is not appropriate to characterize it as a traffic study. In fact, the document by WEC Environmental Engineering and Consulting presents generalities (e.g., citywide statistics, nationwide statistics, and articles about public health concerns in areas other than San Francisco) that are not germane to the DEIR's analysis of the closure of one block of Mason Street on traffic flow in the project area. That study also presents an unsubstantiated claim that Columbus Street (sic) will incur 250 percent more traffic if the one-block segment of Mason Street were closed. Other examples of unsubstantiated/incorrect information in the WEC study include the following: (1) its extrapolation of volumes from short (two-hour) counts to daily volumes (it does not provide either the short-count volumes or the factor(s) used to derive the daily volumes); and (2) its statement that the Columbus/Lombard intersection operates "at-capacity" (compared to the DEIR's determination [shown in Table 8] that the intersection operates at low levels of delay [LOS B]). In addition to not providing the short-count data or the method use to extrapolate to daily volumes, there is no indication of the means by which the two-hour counts were conducted (i.e., manually or using machines with tubes across the street). The daily traffic volumes used for the DEIR analysis (p. 4-2 of the Transportation Impact Study) were collected in July 2009 using machines with tubes over three consecutive days (Tuesday-Thursday), and the full 24 hours of a Saturday. Machine counts over a full day is a much more reliable source of daily volumes than extrapolated numbers based on a very limited data set.

As stated in the DEIR on p. 158, Mason Street designated in the Transportation Element of the *San Francisco General Plan* as a Transit Preferential Street. However, Mason Street is not designated as a Secondary Arterial.²⁴ Irrespective of whether Mason Street is classified as a secondary arterial, which it is not, the proposed project would result in less-than-significant transportation impacts.

As stated in the DEIR on pp. 173 – 174, the vacation of Mason Street under the proposed project would have a less-than-significant impact on emergency access. See Comment [PS-3] from the San Francisco Fire Department, which states “[t]he proposed closure of one block of Mason Street between Columbus Avenue and Lombard Street would not impede or lessen the effectiveness of emergency vehicles traveling to or through the area.”

For a discussion of the WEC Environmental and Engineering Consultants document that purportedly show an increase of 1 to 2 percent (in motor vehicles) since 2005, with further increases until 2030, please see response to Comment TR-5.

Comment TR-3: The EIR fails to discuss how the project would conflict with General Plan Policies related to transportation.

“The DEIR say transportation study is less-than-significant and will have no effect. This is another misleading statement that is also subjective to further the objective and close Mason Street. There is also no mention in DEIR that Mason Street is a secondary Arterial Street. ...

“Objective 18: Establish a street hierarchy system in which the function and design of each street are consistent with the character and use of adjacent land Major arterials—Cross-town thoroughfares whose primary function is to link districts within the city and to distribute traffic from and to the freeways; these are routes generally of citywide significance; of varying capacity depending on the travel demand for the specific direction and adjacent land uses Secondary arterials (MASON ST. IS CLASSIFIED AS A SECONDARY ARTERIAL) Primarily intra-district routes of varying capacity serving as collectors for the major thoroughfares; in some cases supplemental to the major arterial system.

“Policy 18.1: Wherever feasible, divert through automobile and commercial traffic from residential neighborhoods onto major and secondary arterials, and limit major arterials to nonresidential streets wherever possible. Major and secondary arterials are to carry traffic among districts in the city

“Policy 18.2: The following factors should be the basis for a judgment on the acceptable levels of traffic on a specific street: The presence of hospitals, schools, parks, or similar facilities on or near the street.” (*Sal Busalacchi, Letter, October 7, 2010; October 12, 2010*)

Response TR-3

The crux of the comment is the statement that Mason Street is classified as a secondary arterial; the points that the comments make about how the DEIR addressed General Plan policies are tied to that statement. As stated in the response to Comment TR-2, on page 130, Mason Street is not

²⁴ San Francisco General Plan, *Transportation Element*, Map 6- Vehicular Street Map. The document is available electronically at the following web page: http://www.sf-planning.org/ftp/General_Plan/I4_Transportation.htm.

designated as a Secondary Arterial in the Transportation Element of the *San Francisco General Plan*, and regardless, the proposed project would result in less-than-significant transportation impacts as presented in the analysis in the DEIR.

Comment TR-4: Closing Mason Street will result in a significant and unavoidable impact to traffic.

“The HPC also is not convinced that closing Mason Street is a good idea or feasible.” (*Charles Chase, Historic Preservation Commission, Letter, October 25, 2010*)

“As I said, I am in favor of the library, but some of this commercial traffic has got to go. I suggest you have somebody from your department observe on a Sunday when Mason St. is closed during the Farmer’s Market. A staffer could actually count the number of tourist related commercial vehicles that pass through and observe the gridlock firsthand.” (*Robert Fitch, E-mail, August 30, 2010*)

“Nowhere in the EIR does it say there will be NO impact to traffic or the neighborhood. Instead, it says ‘would not conflict with this policy,’ referring at different times to the Transit First Policy or the Better Streets Policy, or any number of policies.

“These statements are NOT a negative declaration of impact. It only states that this project will comply with the Transit First policy. Anybody who says there will be NO IMPACT to traffic or the surrounding neighborhood is ignoring the realities of this section of North Beach.

“Lombard Street is a tourist street As long as the Crooked Street is there, there will be tourists coming to this area of North Beach. The line of cars that extends down Lombard from Hyde Street to Van Ness will tell you, these people are NOT adhering to Transit First.

“And where do they go after they go down the Crooked Street? They continue up Lombard to Coit Tower. It doesn’t matter if parking is no longer allowed, they don’t know that and drive up.

“Once they find they can’t park, they have to come down again. Thus we always have traffic coming and going on Lombard Street. This volume of traffic guarantees problems if that section of Mason Street is closed. I have a clear view of the intersection of Columbus and Lombard, and Mason and Lombard from my house. Tour buses regularly make their way south through that intersection, too often double-parking in the block of Lombard between Columbus and Mason to let tourists off. Once this happens, traffic backs up along Lombard and around the corner onto Mason.

“Intentionally placing obstacles to the free flow of traffic also increases the risk to public safety. North Beach has one fire house on Stockton and Filbert. I often see trucks use this section of Lombard on the way to emergencies. Increasing the probability of traffic backing up in order to discourage the use of private vehicles is foolhardy if it impedes the ability emergency workers to get to a call. Transit First might make sense in an area where there are only residents, who could adapt to changes or obstructions that Transit First policies put in their area. But the tourist nature of North Beach makes implementing Transit First policies in this area unrealistic, and a guaranteed burden to the neighborhood.” (*Brian Lee, E-mail, October 4, 2010*)

“I think the alternatives have been well studied. In spite of what we do, my estimation on traffic studies, of running the figures and everything else, I think the several month closure of Mason Street – and I viewed it a couple of times, in particular, because I wanted to see what would happen at various times of the day – seemed to have no impact, in my opinion, on that area, and I think that was pretty much the conclusion that was reached, is far better, the type of traffic study I would like to look at, than running a bunch of assumed figures. I do feel that the EIR is adequate. I feel that it is complete. And that’s the end of my comments.” (*Commission President Miguel, Public Hearing Transcript, October 7, 2010*)

“The environmental impacts resulting from ‘spot zoning’ the site for increasing the mass of the building, encroaching into Mason Street causing a street reduction or closure. ...

“The DEIR states that “Less than Significant land use impact would occur,” from the proposed project, which would close traffic to the North and South corridor of Mason Street causing major traffic and safety problems throughout the neighborhood even though it would require an amendment to the City’s existing Zoning Map and me in conflict with the urban design elements of the General Plan.” (*Sal Busalacchi, Letter, October 12, 2010*)

Response TR-4

The comments that there is a high volume of tourist-related vehicles (commercial tour buses and private vehicles) that pass through the project area is acknowledged, but that is an existing condition that would continue to exist irrespective of whether the proposed project was implemented. Tour bus circulation was discussed on pages 161 and 165-166 of the Draft EIR. While the closure of Mason Street may result in rerouting of some commercial vehicles, such changes in circulation would not rise to the level of significance, as defined by CEQA.

The DEIR fully analyzed the potential impacts of the proposed street closure (in appropriate topic areas, such as Land Use and Recreation [pp. 78-80], Aesthetics [pp. 120 and 129], and Transportation and Circulation [pp. 165-174]), and it determined that based on the street closure’s accommodation of pedestrian, bicycle, and disabled-person access between the library and recreational uses without necessitating crossing of vehicular traffic flow, the City’s Transit First Policy and *General Plan* policies that encourage use of means of travel other than private automobiles, the less-than-substantial increased delays to vehicles (including transit and emergency vehicles), and the continued accommodation of loading activity, the project would not disrupt or divide the neighborhood nor would it result in adverse transportation effects.

The DEIR (p. 172) acknowledges that the street closure would create additional competition between queues of vehicles and pedestrians at the intersection of Columbus Avenue and Lombard Street, but while this condition is undesirable, it would not result in potentially hazardous pedestrian conditions beyond what exists in the area today and what is common of dense urban environments. In addition, the street closure would eliminate some of existing interactions between pedestrians, bicyclists and vehicles at the intersections of Columbus Avenue and Mason Street, and Lombard and Mason Streets.

At no time does the DEIR say there would be No Impact. It discloses all the impacts associated with the closure of Mason Street and measures the changes that are expected to occur as a result

of the project against established thresholds of significance. While the changes in circulation do not trigger a significant environmental effect based on those thresholds, the DEIR says that this project would have a less-than-significant impact, not that it would have no impact.

Regarding “spot zoning,” please see response to comment LU-4. The term typically refers to the granting of a zoning designation incompatible with surrounding zoning districts. The proposed rezoning of 701 Lombard Street to a P District would not be considered out of character for the surrounding area.

For a discussion of the proposed project’s effect on emergency vehicle access, please see the next to last paragraph of the response to Comment TR-2.

For a discussion of the proposed project in relation to the *General Plan* Urban Design Element, please see response to comment LU-4.

Comment TR-5: The EIR fails to discuss cumulative growth and traffic impacts related to trends of increasing issuances of drivers licenses, vehicle registrations, and regional travel.

“The DEIR transportation study did not go into depth as to what will happen in the future. (*Attachment to letter includes traffic count data, as well as a letter addressed to the Commenter from WEC Environmental Engineering Consultants; These documents are not quoted here, but they are addressed in the response and are included in Attachment 1 of this document.*)

“Enclosed: Department of Motor Vehicles Driver Licenses Outstanding by County. San Francisco has a positive growth rate every year.

“Table S.15. Total Vehicles Available in Households. 2 pages. San Francisco has a positive growth rate every year.

“Table S.17. Gross Vehicle Density (Household Vehicles per Square Mile). San Francisco has a positive growth rate every year.

“METROPOLITAN TRANSPORTATION COMMISSION (MAPS & DATA) DRIVER LICENSES IN SAN FRANCISCO, As of December 31 year:

- 2005 514,156
- 2006 519,545 1.01% increase
- 2007 529,325 1.9% increase

“Conclusion: Between 2005 December (MTA Mason Street Study) and December 2007 there has been an increase of 15,169 driver licenses, an increase of 2.9%.

“ESTIMATED FEES PAID VEHICLE REGISTRATIONS IN SAN FRANCISCO, As of December 31 year:

- 2005 435,244
- 2006 442,014 1.6% increase
- 2007 446,488 1.1 % increase

“Conclusion: Between 2005 December (MTA Mason Street Study) and December 2007 there has been an increase of 11,244 vehicle registrations, an increase of 2.7%.

“SAN FRANCISCO BAY AREA REGIONAL DEMOGRAPHIC AND TRAVEL CHARACTERISTIC (Source: www.mtc.ca.gov/maps_and_data/datamart/stats/baydemo.htm), Total Vehicles in year

- 1990 3,974,100
- 2000 4,325,000 8.8% increase
- 2006 4,722,000 9% increase
- 2016 5,146,600 9% increase
- 2025 5,555,100 8% Increase
- 2030 5,746,700 4% increase

“Conclusion: From December 2005 to December 2007 based on the facts given above there is an increase of approximately 1 % to 2% motor vehicles that use Mason Street. By the year 2030 the increase in percentage will slowly decrease, but nevertheless closing Mason Street will cause major traffic problems in the neighborhood.” (*Sal Busalacchi, Letter, October 12, 2010; Letter, October 7, 2010*)

Response TR-5

The DEIR analyzed cumulative (year 2030) traffic conditions under Impact TR-2 (p. 169), with tabular presentation of intersection levels of service in Table 8 (p. 168). As stated in the DEIR, the cumulative 2030 traffic volumes in the vicinity of the North Beach Library were based on expected traffic growth rates between 2005 and 2030 obtained from the relevant travel demand forecasting model (in this case, the San Francisco County Transportation Authority [SFCTA] model. This method of traffic volume projection is consistent with standard traffic analysis practices. Appendix J of the Transportation Impact Study includes a detailed description of the SFCTA Model and the methodology used to derive cumulative traffic volumes. The data at the Metropolitan Transportation Commission web site (the number of driver licenses and auto registrations in San Francisco, and vehicle ownership data for the nine-county San Francisco Bay Area) cited by the comment have no bearing on how traffic growth projections are calculated for the purpose of deriving reasonably-foreseeable growth in proximity to the project site. For example, driver licenses and vehicle registrations do not correlate to vehicle trips. There are people who own a vehicle and/or have a driver license that use public transit for much of their travel. Moreover, there is no indication that more drivers citywide would lead to more vehicles traversing Mason Street.

Comment TR-6: Comments regarding cumulative traffic impacts

“I am writing in support of the plan for the new North Beach Library. My question is the same one I asked in July 2009. Will SFMTA and SFPD do anything to regulate traffic on Lombard between Powell and Columbus? Right now tour busses, motorized cable cars, talking electric cars, Segways and numerous other for profit businesses use the public street as their place of business. Do they pay the City for this? Are they regulated? Can some of this traffic be diverted? The “Hop On Hop Off” double decker busses actually double park at the stoplight at Lombard and Columbus, causing cars to pass on the wrong side of the road at a busy corner.” (*Robert Fitch, E-mail, August 30, 2010*)

“As addendum to this statement, I firmly believe that the following points all should be considered within a ‘master plan’ context for our whole neighborhood, rather than as separate entities:

1. Columbus corridor expansion for pedestrians;
2. Bus route prohibitions similar to Russian Hill, with a tour bus zone free of multi-seating vehicles which protects residential areas in North Beach;
3. Possible closure of Vallejo and, Grant street market area, Powell between Washington and Columbus, incorporating the abandoned theater in the plans as well as the old “bear pond triangle park;
4. Discussion of entrance and exit possibilities for Central Subway, not dismissing the possibility of elevator access rather than escalator or steps;

“Seriously considering extending the Central Subway (with elevator access) to North Beach, Fishermen’s Wharf, Van Ness and Crissy Field. I add this addendum because I am convinced that the construction of a new North Beach Library is relevant to further plans in North Beach.” (*Dr. Karen Melander-Magoon, E-mail, August 27, 2010*)

Response TR-6

The comments state support for the proposed project and provides numerous questions beyond the scope of the proposed project. The comments are noted.

As stated in the DEIR on p. 169, the proposed project would result in less-than-significant cumulative traffic impacts.

Of note, in October 2010, Board of Supervisor President David Chui proposed steps to address problems of tour buses idling too long, blocking traffic, and using loud amplification systems in residential neighborhoods. In February 2011, the San Francisco Municipal Transportation Agency presented details and analysis of proposed restrictions to the San Francisco Planning Department to initiate the environmental review process for a proposal to restrict tour buses on portions Mason, Powell, Stockton, Francisco and Lombard, Streets in the project vicinity. On March 24, 2001, the Planning Department determined the proposed tour bus restrictions are categorically exempt from environmental review under Class 1 of the CEQA Guidelines classes of CEQA exemptions, which covers the “operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private ... facilities [including streets] ..., involving negligible or no expansion of use beyond that existing at the time of the lead agency’s determination” (CEQA Guidelines Section 15301).²⁵ In addition, the *Columbus Avenue Neighborhood Study* completed by the San Francisco County Transportation Authority in January 2010 (cited on page 166 of the DEIR) identified street design changes and policy measures to identified street design changes and policy measures to support the livability and economic viability of the Columbus Avenue corridor. Lastly, the Central Subway project is currently under

²⁵ The Categorical Exemption is available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2008.0968E and Case File No. 2011.0234E.

construction (utility relocation work). As stated on page 167 of the DEIR, no plan currently exists to extend the subway to North Beach, and an extension of the current Central Subway (to North Beach and beyond) would require a separate planning study and a separate funding request process.

Noise

Comment NO-1: Removal of mature trees would result in effects to noise.

“There is no arborist report on the mature trees in the triangle to be demolished. These trees, if well maintained, would form a tree portal like the one in front of the swimming pool and the one straddling Columbus Avenue at Washington Square. The trees would be an acoustic barrier for Columbus Avenue traffic noise. They take years to grow.” (*Zack Stewart, Letter, October 2, 2010*)

Response NO-1

The comment refers to the noise-buffering nature of mature street trees.

Regarding the effects of trees on noise levels, trees are generally not considered to provide substantial noise-buffering due to their permeable nature. For example, along stretches of expressways that travel through built-out urban and suburban areas, vegetation is not considered an adequate noise buffer. Caltrans, for example, in its noise guidance, states that “ordinary landscaping” along a roadway normally results in a noise reduction of one decibel, which is not perceptible to most persons. It would require a stand of trees approximately 50 feet wide to provide a meaningful noise reduction of 3 decibels.²⁶ Instead, sound walls are constructed by Caltrans, or other agencies, to shield adjacent development from traffic noise levels.

Therefore, the existing trees along Columbus Avenue, as well as along and within other portions of the project site, are not considered to provide an acoustic barrier, and their removal would not result in significant noise impacts.

Please see response to comment BI-1, on page 149, regarding an arborist report.

Comment NO-2: The project would result in a sound wall along Columbus Avenue that would affect noise.

“There is no acoustical evaluation of the one hundred foot long, two story high sound wall to be built along Columbus Avenue. It will completely change the current tree-dampened acoustics. ...

“...and the hundred foot sound wall on Columbus Avenue will be distracting and a possible source of noise.” (*Zack Stewart, Letter, October 2, 2010*)

²⁶ Caltrans, Environmental Program, *Technical Noise Supplement*, 1998, p. 33. Available on the internet at: <http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf>.

“The acoustician [whom I consulted] says that the 100-foot long, two-story sound wall on Columbus Avenue will alter the acoustics of Columbus Avenue.” (*Zack Stewart, Public Hearing Transcript, October 7, 2010*)

Response NO-2

The comment refers to potential changes to noise as a result of construction of the proposed library building at 701 Lombard Street.

As stated in the Initial Study (DEIR Appendix A, page 33, based on modeling of traffic noise volumes conducted by the San Francisco Department of Public Health (DPH), the traffic noise level in the project area vicinity is generally between 65 dBA and 70 dBA.

The new library façade along Columbus Avenue would reflect traffic noise along the street, which would be a change from existing conditions. This noise environment, however, would be essentially similar to the existing noise environment along most of the Columbus Avenue corridor, as well as other city streets, along which buildings line both sides. The library use and expanded recreational use are not expected to generate traffic at levels that would result in increased noise from cars. The impact to ambient noise levels would be less than significant.

Regarding the noise-buffering nature of street trees, please see response to comment NO-1, above.

Overall noise levels in the playground would be altered by the proposed project. As stated in the Initial Study (Appendix A of the DEIR) on page 33, the project’s new library at 701 Lombard Street, as well as excavation of the existing children’s play area below the grade of Greenwich Street, would result in further buffering of noise generated by playground activity from surrounding streets. The project’s playground would be further shielded from traffic and cable car noise on Columbus Avenue.

As stated in the Project Description, the mature trees removed for construction of the new library would be replaced. These trees would gradually mature, and any noise-dampering effects that they provide would be achieved over time.

Comment NO-3: The moving of the tennis courts southward would increase noise levels along Greenwich Street.

“Those tennis courts are located in the center of the playground for a very good reason, there are walls, high walls, on three sides, and they keep the noise from traveling. The noisiest aspect of that playground is the tennis courts. If you relocate those tennis courts to any other streets where there are residents, those residents are going to be impacted severely by percussive noise starting at 7:00 in the morning. It is not going to be easy to study, work, or sleep with that tennis court along Greenwich, along Stockton, along Lombard. It is also going to intrude into the hardscape there and I can tell you from looking at that playground, nothing is used more than that large rectangle out there of open space. Anything that intrudes on that is going to impact the kids that play on that. The majority of kids playing there are five and up, so, if you cut into that with the tennis court, not only do you get noise, you get less use of that space for the

age demographic that has most need of this. Thank you for your time. I hope you will consider it. And I did not read the Environmental Impact Report, I don't know whether it addresses this issue, but I just don't see how it could not be noisy with people pounding tennis balls, running and groaning at 7:00 in the morning, all day long, for everybody on Greenwich. And then there are the kids coming around the playground all day.” (*Robert Hinish, Public Hearing Transcript, October 7, 2010*)

Response NO-3

The comment refers to potential operational noise effects associated with the relocation of the tennis courts under Phase 2 of the proposed project.

Although relocation of the tennis courts would move the noise-generation of tennis play about 40 feet southward, the sunken nature of the tennis courts would continue to shield the tennis noise from residential properties on the south side of Greenwich Street. In addition, although the current children's play area may provide a buffer to existing tennis noise, the play by children also generates noise under existing conditions. Noise associated with children's play would be relocated 40 feet northward from properties on Greenwich Street under the proposed project.

As stated in the Initial Study (Appendix A of the DEIR), on page 33, the proposed active children's play area and tennis courts, as well as the renovated multipurpose hardscape area, would be 11 feet below the grade of Columbus Avenue. These changes would result in buffering of noise generated by playground activity from the surrounding streets, as described in response to comment NO-2, above.

No substantial change in activity at or use of the tennis courts is anticipated with implementation of the proposed Master Plan. Therefore, change in the noise level generated would be negligible, compared existing conditions. In addition, any increases in ambient noise levels associated with the tennis court relocation southward (closer to properties on Greenwich Street) would be tempered by the existing ambient noise environment of the area, which is dominated by motor vehicle traffic on Columbus Avenue, noise levels from which would generally serve to largely diminish perceptible increases in tennis ball impact noise and shoe squeak. These noise sources currently exist on the project site. The project would not introduce a new source of percussive noise; nor would it eliminate the high walls that serve to dampen these noise sources.

Air Quality

Comment AQ-1: The re-routed traffic around the vacated Mason Street right-of-way would result in impacts to air quality and public health.

“[A consulting firm contacted by one commenter] predicted air quality effects from this added traffic to both residents and tourists on the main thoroughfare of Columbus Avenue caused by CO2 pollutants and more particularly, cancer causing diesel fumes from re-routed tour buses.” (*Joan Wood, Letter, October 12, 2010*)

Response AQ-1

The comment refers to air quality impacts related to the closure of Mason Street.

The re-routing of traffic around the vacated portion of Mason Street would incrementally increase traffic-related emissions on Columbus Avenue because many cars that currently travel on Mason Street would use Columbus Avenue instead. These cars could also use Lombard Street if they detoured around the new library; alternatively, some cars could detour via Powell Street and others might simply continue on Columbus Avenue to the Fisherman's Wharf area. Regardless, the closure of a partial block of Mason Street would not, in itself, generate any additional traffic, and therefore would have no direct air quality impact. Also, as indicated by the Level of Service (LOS) reported on page 168 of the DEIR, the re-routing of traffic is not expected to cause serious delays that would result in increases in emission concentrations associated with longer vehicle dwell times. Therefore, no indirect air quality impacts relocated to elevated pollution concentrations are anticipated. To the extent that pollutant levels along some streets, such as Columbus Avenue, would increase slightly, levels would decrease elsewhere (such as on the block of Mason Street that would be closed).

Based on the traffic analysis conducted for the project and summarized in the EIR, the changes in roadway volumes due to the closure of Mason Street would not be substantial enough to result in an adverse air quality effect related to pollutant concentrations near specific streets in the project vicinity. Moreover, the street network in the neighborhood is such that any particular receptor location is affected by traffic from several streets at the same time, further diminishing the effect of a minor shift in traffic patterns. The impacts to air quality are therefore considered less than significant.

Additionally, as noted in the response to Comment TR-6, p. C&R-137, the City is considering restrictions on tour buses in the project vicinity. Such restrictions, if implemented, would reduce pollutant levels generated by existing tour bus traffic in the neighborhood.

Comment AQ-2: Demolition of the existing library and construction of the proposed library would result in emissions. The Draft EIR is not accurate in its description of the project as infill development in this regard.

“Regarding the DEIR’s discussion of the Climate Action Plan (Pg 63), the DEIR is inaccurate to call this project an “infill development” since it is a demolition and the relocation of an existing facility by only a few feet. Also, this proposed development of a new library is on a parcel acquired for “open space.” Demolition of a building would increase emissions. As stated above, it is inaccurate to describe the project as “removing an existing surface parking lot” since the SFRPD can do this at any time and has chosen instead to continue to operate and receive the revenue from the parking lot.” (*Vedica Puri, Letter, October 12, 2010*)

Response AQ-2

The comment refers to the definition of “infill development” and states that the Draft EIR is incorrect in describing the proposed library project as such. “Infill,” in its broadest sense, is material filling what is otherwise unoccupied space. The proposed project, which would not only develop the

surface parking lot but also redevelop the footprint of the existing library, is therefore considered infill development for purposes of the EIR.

The Draft EIR does discuss that that demolition of the building would result in emissions. As stated in the Initial Study (Appendix A of the DEIR), page 48, “demolition, grading, and new construction activities would temporarily affect local air quality during the project’s 20-month construction schedule, causing temporary increases in particulate dust and other pollutants.” As stated on page 46, “the proposed project would increase activity onsite by demolishing the existing library. ... Construction of the project would emit approximately 525 tons of CO₂-eq.” The EIR therefore adequately discusses these impacts.

As an important step to reduce air pollution from public works projects in the City, San Francisco’s Board of Supervisors adopted the “Clean Construction” ordinance (Ordinance No. 70-07) in 2007 to require City Contractors to adopt clean construction practices including biodiesel fuel and emissions controls within two years. The intent of the Clean Construction Ordinance was to improve health and allow contractors to gain a competitive advantage over those outside San Francisco by using incentive funding to install pollution controls ahead of state requirements, which have since been adopted. The ordinance is applicable to projects that are considered major, in that they would take at least 20 days of cumulative work to complete. In addition, for those major projects, the emissions control requirements would apply to “high use” vehicles or diesel equipment, that are used 20 or more hours during any portion of the project. Beginning in March 2009, contractors performing major public works projects in San Francisco must comply with the following:

- Use biodiesel in the off-road vehicles and equipment used on the job. The fuel must be at least a 20 percent blend of biodiesel (B20), but can be as high as 100 percent (B100); and
 - Use construction equipment (25 horsepower or more) with engines that either meet U.S. EPA Tier 2 (Tier 2 refers to emission standards for nitrogen oxides, hydrocarbons, and particulate matter from new nonroad diesel engines promulgated by the U.S. EPA in 1998, standards for off-road engines); or
 - Use the most “effective verified diesel emission control strategy”, also known as “best available control technology.”

Regarding existing conditions at the project site, pursuant to CEQA and recent case law²⁷, the environmental baseline to be used in analysis are the existing conditions at the project site, regardless of entitlements, permits, jurisdiction, or ownership. Therefore, the ownership of the site by the City and County of San Francisco, and the jurisdiction of the SFRPD, does not change the fact that the site is an existing commercial parking lot and the proposed project would remove that parking lot.

Finally, the BAAQMD has determined that the City and County of San Francisco has a Qualified Greenhouse Gas Reduction Strategy and thus no further quantification of such impacts is necessary for project consistent with this strategy. The proposed project would be generally consistent with the City’s GHG reduction strategy because it would provide no on-site vehicle

²⁷ See footnote 2, p. C&R-35.

parking while providing parking for bicycles; because library and park employees, like all City employees, are offered commuter benefits for transit and vanpool expenses and are eligible for the emergency ride home program; because library and park vehicles are purchased consistent with the City's requirement that they be the cleanest and most efficient vehicles available on the market; because construction contracts would specify the use of cleaner diesel vehicles; because new construction would be undertaken consistent with the City's Green Building Ordinance and would incorporate recycled content material to the maximum extent feasible; and because new street trees would be planted as part of the project, among other factors.

Regarding the acquisition of the 701 Lombard Street parcel by the City, please see Response PD-1.

Wind and Shadow

Comment WS-1: The shadow analysis methodology is not consistent with Proposition K and/or violate city codes.

"22 pages are devoted to an analysis of increased shadowing; then the EIR concludes (on page 200) that this increased shadowing will mostly be offset when the current library is demolished and that therefore a less-than-significant effect has occurred! I don't believe this method of calculation was intended when the voters passed Proposition K." (*Joan Wood, Letter, October 12, 2010*)

"The 'new shadows' created whereby building a park under the shadow of buildings is not allowed by city codes." (*Sal Busalacchi, Letter, October 12, 2010*)

Response WS-1

As stated in the Draft EIR on p. 178, Proposition K was passed in 1984 to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset. Planning Code Section 295, added by Proposition K restricts new shadow on public spaces under the jurisdiction of SFRPD by any building taller than 40 feet. Therefore, the proposed library building at 701 Lombard Street is not subject to Section 295 because it would be less than 40 feet tall. The proposed project complies with city code requirements regarding shadow.

Nonetheless, a shadow analysis was prepared by the project architect and reviewed by the environmental consultant. The Draft EIR analysis concludes that, for CEQA purposes, shadow impacts would be less than significant because new shadow would be cast primarily on the vacated Mason Street right-of-way, while the existing Joe DiMaggio Playground would experience a net decrease in shadow. As stated on Draft EIR page 178, the significance criterion for shadow effects asks whether a project would substantially affect outdoor recreation facilities or other public areas. Because Joe DiMaggio Playground would experience a less shadow with implementation of the proposed project, shadow would not be expected to adversely affect use of this recreational space. Therefore, the project effect would be less than significant.

Comment WS-2: The shadow analysis determination of a less-than-significant impact is not consistent with recently introduced legislation.

“Shadow: The DEIR does Not Adequately Address or Analyze Impacts on Impact on Shadow and Wind.

“The shadow impact analysis conclusion contained in the DEIR is inadequate in that it clearly shows the building massing and shadow effects especially on the proposed park.

“Within the North Beach Playground during a Recreation and Park outreach displaying the architectural model of the North Beach Master Plan the sun was moving west and cast a shadow on the display. The Recreation and Park staff had to move the model into the sunlight because it became too cold when everyone was put into the shadow. The new park on Mason Street will be due east and directly under the shadow of the proposed project. The shadow will be larger and go directly onto the Mason Street proposed park during. This is the time of day when we would use the sun for warmth. When this shadow hits the park it will get cold. No one will use this park when it’s in shadow. Our supervisors know this and introduced legislation opposing shading of Public Parks and Open Space that the DEIR seems to ignore.

“Legislation Introduced January 12, 2010 [Opposing Shading of Public Parks and Open Space]00061Sponsors: Chiu; Avalos, Campos, Daly, Mar, Maxwell and Mirkarimi Resolution opposing changes to the Park Shadow Ban that would increase shading of public parks and open space. REFERRED FOR ADOPTION WITHOUT COMMITTEE REFERENCE AGENDA AT THE NEXT BOARD MEETING.

“SEC.101.I.—MASTER PLAN CONSISTENCY AND IMPLEMENTATION

“([paragraph] 8) That our parks and open space and their access to sunlight and vistas be protected from development. The City may not adopt any zoning ordinance or development agreement authorized pursuant to Government Code Section 65865 after November 4, 1986, unless prior to that adoption it has specifically found that the ordinance or development agreement is consistent with Priority Policies established above.

“The shadow analysis is not objective but reads as if written to promote the proposed project over the code-complying project.” (*Sal Busalacchi, Letter, October 12, 2010*)

Response WS-2

The comment summarizes some of the Draft EIR analysis of shadows cast by the proposed library building in the afternoon hours. As concluded in Section E, on balance, the proposed project would result in a net decrease in shadow duration and area across the existing Joe DiMaggio Playground, although it would cast new shadow on certain recreational areas at specific times of day and year.

As stated on DEIR page 200, new shadow would be cast on the Mason Street open space in the afternoon and evening hours, year-round, but the effect would not be such that the use of the proposed Mason Street open space would be substantially and adversely affected. As shown by the shadow study, the space would be in sunshine during morning and midday hours, year-round, as well as afternoon hours in the summer months. Moreover, it would be speculative to conclude

that the space would be unusable when it is shaded during afternoon and evening hours. The final design of the Mason Street right-of-way, if vacated, would take into account shadow and respond with a design appropriate to the setting. Currently, the conceptual design of the area envisions passive recreational use.

Regarding legislation introduced on January 12, 2010, related to shading of public parks and open spaces, the Board of Supervisors resolved to oppose the legislation at its January 26, 2010, meeting, and the legislation was referred to the Land use and Economic Development Committee. The DEIR is not required to discuss pending legislation, or legislation that has expired for lack of a legislative sponsor.

As stated above, the Lead Agency must analyze projects under existing codes at the time of preparation of the EIR (“Regulatory Setting”), and it is beyond the scope of the EIR or the ability of the Lead Agency to speculate what potential future, yet-to-be adopted laws may apply to a project site.

Regarding shadow that could be cast by a “code-complying” project, as requested by a commenter, the existing 701 Lombard Street parcel falls within a 40-X height and bulk zoning district. As analyzed in the Draft EIR in Chapter 6, the Three-Story Library (701 Lombard Parcel) Alternative would be consistent with the existing height and bulk district (although, as stated in response to comment PD-13, on page 64, the proposed library use’s size would not be permitted in the North Beach Neighborhood Commercial District). The Three-Story Library (701 Lombard) Alternative would be 10 feet taller than the proposed library, and it would be constructed within the existing 701 Lombard Street property lines (as opposed to the proposed library, which would encroach 19.5 feet into the Mason Street right-of-way). As discussed on page 236, such a building would cast shadows of similar length and duration onto Mason Street during the afternoon and evening hours, year-round. Therefore, the library building developed under this alternative would result in similar shadow impacts to those that would result under the proposed project.

As stated by the comment, the DEIR “clearly shows the building massing and shadow effects especially on the proposed park.” The DEIR objectively presents shadow impacts of the proposed project.

Comment WS-3: What are the wind impacts of the proposed project?

“Shadowing and wind impact of the proposed building. It appears that the proposed building would cast afternoon shadows onto some of the play areas such as the Bocce courts. What are the wind impacts?”
(*Peter Warfield, Executive Director, Library Users Association, E-mail, October 12, 2010*)

Response WS-3

The wind impacts of the proposed project are analyzed in the Initial Study (DEIR Appendix A, page 51, “wind impacts are generally caused by large building masses, typically 80 feet in height or greater, extending substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. The proposed project is a 30-foot-tall building and would not be substantially taller than other

buildings in the area, including the pool and clubhouse, such that it would cause adverse ground-level wind effects. Therefore, wind effects would not be significant.”

Public Services

Comment PS-1: The design of the library would result in adverse impacts to library patron safety and police protection.

“A safety issue, if you are inside and you have a problem, the police will not be able to see inside. That is number one.” (*Sal Busalacchi, Public Hearing Transcript, October 7, 2010*)

Response PS-1

The comment states that the proposed library would have adverse impacts on safety because library walls would not allow visual surveillance into the building by police officers outside. Given that almost every building in the city, except those comprising glass curtain walls, at least partially impedes visual surveillance from the outside, opaque walls are not considered to result in adverse impacts to safety. Police officers enter buildings to provide services, when necessary. There is nothing inherent in a library as a land use to suggest that it may increase demand for police protection services. Also, the proposed library incorporates more glazing than the existing library. As stated in the Initial Study (Appendix A of the DEIR), on page 60, the proposed project would have a less-than-significant impact on police protection services because the use would not require construction of a new police facility.

Comment PS-2: The vacation of Mason Street would result in adverse impacts to public safety and police protection near the project site.

“Yes, we do need a new library that is accessible to everyone and has computer availability; however, I disagree with what I’m hearing from the EIR, that it would make the neighborhood safer. My experience during the short time that there was a temporary street closing and park was an incredible increase in the homeless, scary, homeless people living there. I personally experienced, well, let me go back, the park and the landscaping – the landscaping and the library are integrally connected, you cannot consider one without considering the impact of the other. The impact of the open space which is necessary, however, they are building a very secluded area that will be a Mecca. ...

“During the temporary street closing, I was practically attacked in the Laundromat, the police had to come, every morning there were homeless men on my doorstep drunk, there were beer cans in front, there were beer cans in the homeless park, when I walked by with my head down, trying to go to the pool, there were a bunch of drunk guys playing the guitar and jeering at me because – I don’t know why, I had my head down and I was just trying to ignore them, it’s not safer. And until this design flaw of building the park so that it is secluded, you cannot see it from Columbus Avenue, people will be able to stay there all night, there is no talk about fences, there is no talk about you must have a walking corridor for people on Mason Street so they can get through there, that the park has to be open – where I’ve spoken to police that patrol that area, they also feel it’s a problem. What can I say? I hope we can get a new library, but I hope you will see that the impact of this landscaping and design for open space is just going to negatively impact the safety of the neighborhood. And that can be considered, it should not go forward until you

accept that. Don't say we have to have the library first and then we'll do the other. They are together, and it really needs to be solved, both problems, everything in modern life is very complex.” (*Karen Weiss, Public Hearing Transcript, October 7, 2010*)

Response PS-2

The comment refers to an incident in a laundry washing facility in which the commenter felt threatened during the temporary closure of Mason Street during August 2009. The comment also states that there was a noticeable increase in beer cans and homeless people in the park during the street closure, and that the landscaping and design of the proposed project would result in decreased safety.

As stated in the Initial Study (Appendix A of the DEIR), on p. 59, a project would be considered to have a significant impact on public services if it would result in the provision or need for new or physically altered government facilities to provide police protection. The proposed project is not expected to increase crime in the area such that additional police protection services would require new or expanded facilities, so the impact is considered less than significant.

As stated in the Draft EIR on p. 43, an interim design for the vacated Mason Street right-of-way would be developed with the community. As stated on p. 45, this space would be further improved to create an outdoor reading area and plaza. At those, SFRPD, in collaboration with SFPL, the community, and other agencies, will determine the necessity of fencing, lighting, or other security measures.

Comment PS-3: The vacation of Mason Street would not adversely impact Fire Department operations.

“Review of the Transportation Study shows that the proposed project would not adversely impact Department operations. The proposed closure of one block of Mason Street between Columbus Avenue and Lombard Street would not impede or lessen the effectiveness of emergency vehicles traveling to or through the area. (*Joanne Hayes-White, Letter, October 8, 2010*)

Response PS-3

The comment refers to the potential impacts to fire protection services from the proposed project.

As stated in the DEIR on pp. 173–174, the vacation of Mason Street under the proposed project would have a less-than-significant impact on emergency access.

Comment PS-4: The proposed seismically safe library could be a disaster response hub.

“A new seismically safe library built for the North Beach community could potentially serve as a disaster response hub for the neighborhood in the event of a City-wide disaster.” (*Joanne Hayes-White, Letter, October 8, 2010*)

Response PS-4

The comment refers to the potential for a new library to serve as a disaster hub in the event of a City-wide disaster. The comment is noted.

As stated on DEIR p. 29, a project sponsor objective is to ensure that the library meets current San Francisco Building Code standards for seismic safety. Construction to these standards would allow the building to serve as a disaster hub, as mentioned by the comment. The existing library building is not eligible to serve as a disaster hub, given the building's seismic hazard rating.

As stated on DEIR pp. 213 and 219, both the Preservation and Rehabilitation Alternative, and the Preservation and Southerly Expansion Alternative, would additionally result in renovation of the existing library to meet State Historic Building Code standards for seismic stability. As stated in the DEIR on p. 208, under the No Project Alternative, "the existing library would be evaluated by the appropriate City agencies for safety and accessibility. Depending on their analysis, the library would then need to reassess potential renovation scenarios, given its existing seismic hazard rating, and there is a possibility that it would eventually be closed due to deteriorated or unsafe building conditions." Therefore, adequate seismic stability of the existing building cannot be assured.

Biological Resources

Comment BI-1: The EIR is not informed by an arborist report or other biological assessments and is therefore inadequate. The new trees may not be consistent with those existing in the project vicinity.

"There is no arborist report on the mature trees in the triangle to be demolished. These trees, if well maintained, would form a tree portal like the one in front of the swimming pool and the one straddling Columbus Avenue at Washington Square." (*Zack Stewart, Letter, October 2, 2010*)

"The Arborist [whom I consulted] says there's no arborist report on the trees that will be demolished in the EIR description." (*Zack Stewart, Public Hearing Transcript, October 7, 2010*)

"There is no arborist consulted, and trees – mature trees will have to be eliminated if that lot is used." (*Joan Wood, Public Hearing Transcript, October 7, 2010*)

"The DEIR discloses that, in addition to the three of the mature Laurel fig trees, the project will remove of all of the other street trees—and virtually all of the existing mature trees in the park, but is incomplete in that it does not contain information or analysis of the impacts of their loss.

- (a) Is there an arborist report on the condition of the trees to be removed?
- (b) Is there a biological assessment of the impacts to birds that will be caused by the removal of all these trees?
- (c) Please include in the EIR a section analyzing the potential impacts on birds and nesting which will result from the removal of the existing these trees.

- (d) How was the selection of the proposed new trees made?
- (e) Are the proposed new trees consistent with the other trees lining Columbus Avenue and Lombard Street?" (*Vedica Puri, Letter, October 12, 2010*)

Response BI-1

The comments refer to the impacts to biological resources from the removal of existing trees on the project site. As stated in the Initial Study (Appendix A of the DEIR), beginning on page 62, a tree survey of the site was conducted in February 2009. Five trees were found to line the perimeter of 701 Lombard Street, and 42 trees were found to line the perimeter of 2000 Mason Street / 661 Lombard Street. Please see response to comment BI-2, below, which states that a total of 19 mature trees would be removed under the project, including all trees surrounding the 701 Lombard Street parcel.

Additionally, there are several bushes, herbs, and trees within the existing playground. None of the trees or bushes is considered rare or endangered species, no nests were observed in the trees, and the trees are not considered to provide substantial habitat for rare or endangered wildlife species. A formal, written evaluation of each tree would be performed by the City prior to removal.²⁸ Therefore, a separate arborist report was not necessary.

As stated on page 64 of the Initial Study, although no nests were observed, implementation of mitigation measure M-BI-1, which would entail pre-construction surveys for migratory birds during breeding season, would ensure that impacts to breeding birds are less-than-significant.

Comment BI-2: The EIR does not adequately describe the process through which trees would be removed and does not conclude that there would be a significant impact to mature trees.

"Ignores fact that plan requires removal of three mature trees" (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

"The DEIR is inadequate in that it does not include a description of the San Francisco Tree Ordinance and how it would apply to the project's proposed removal of trees. Please respond to the following:

- (a) Would any of the trees to be removed under the proposed Master Plan project meet the requirements for a "significant tree" under the SF Tree Ordinance?
- (b) Please set forth in the EIR all of the requirements governing removal of street trees pursuant to the San Francisco Tree Ordinance.
- (c) How many of the trees proposed for removal as a part of the proposed Master Plan are located within 10 feet of a public right-of-way?
- (d) What are the notice, hearing, and appeal process for removal of a significant tree?" (*Vedica Puri, Letter, October 12, 2010*)

²⁸ Short, Carla, Department of Public Works Bureau of Urban Forestry, personal communication with Branch Library Improvement Program staff, December 20, 2010.

“Destroying three magnificent mature trees” (*June Osterberg, Letter, October 12, 2010*)

“Three magnificent mature trees would be destroyed.” (*June Osterberg, Public Hearing Transcript, October 7, 2010*)

Response BI-2

The comments refer to tree removal, state that the Draft EIR does not adequately describe the San Francisco Tree Ordinance, requests a list of all trees to be removed and their location, and states that the project would destroy trees.

The list of trees that would be affected by the proposed project, and a discussion of the San Francisco Public Works code related to trees, is provided in the Initial Study (Appendix A of the DEIR), on pages 62 through 64. As stated on page 63, a total of 21 mature trees would be removed by the proposed project. Some of these trees may be classified as “significant trees,” and others would be classified as “street trees,” depending on their location either within 10 feet of the public right of way, or within the public right-of-way, respectively. The permitting process for tree removal is the same for both significant and street trees.²⁹

These trees would be replaced. A complete transcription of the tree ordinance is not required to provide this discussion or perform this analysis.

Regarding streets in the public right-of-way, the five trees along the 701 Lombard Street perimeter are within the public right-of-way, and they would be removed during Phase 1. Two additional trees in the Columbus Avenue right-of-way would be removed during Phase 2. Fourteen other trees, located within the public spaces of the playground, would be removed during Phase 2. Please see the response to Comment LU-5, p. C&R-79, for additional information concerning tree removal procedures of the Department of Public Works and the Recreation and Park Department.

As stated in the Initial Study, the tree removal would not result in significant impacts.

Geology and Soils

Comment GE-1: The EIR does not adequately discuss structural surveys or reports regarding retrofitting of the building or construction of a lower floor.

“There is no mention of the structural survey of the Appleton, which gave it a good rating, and no structural report on the feasibility of a retrofit and construction of a lower floor under the Appleton. Both engineers [whom I consulted] have done this type of project successfully.” (*Zack Stewart, Letter, October 2, 2010*)

²⁹ ibid.

Response GE-1

The comment refers to geotechnical and structural reports prepared for the existing North Beach Branch Library building and states that the EIR should include a discussion of these reports. As stated in the Draft EIR on page 22, the following documents were used in the analysis of seismic impacts:

- *SFPL Branch Facilities Plan* (2000), prepared by the San Francisco Public Library
- *Geotechnical Report* by the San Francisco Department of Public Works (DPW) (2009)
- *Seismic Assessment of North Beach Branch Library* prepared by E.G. Hirsch & Associates (1995)

As stated in the DEIR Project Description on pp. 25–26, the 1995 DPW report found that the existing library has major structural deficiencies, and it assigned the building a Seismic Hazard Rating of 3, which means that it would be subject to “major damage” from a major seismic event. The *Branch Facilities Plan* stated that the building was in need of several renovations and replacements.

As presented in the Initial Study (Appendix A of the DEIR), other sources used in the analysis of geophysical impacts include the Association of Bay Area Governments (ABAG) earthquake maps and the Trans Pacific Geotechnical Consultants, Inc. *Report: Geotechnical Investigation, Proposed Commercial and Residential Development, 701 Lombard Street, San Francisco, California* (September 1988).

These technical studies and detailed data reports are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, in Case File No. 2008.0968E. The Lead Agency considers these analyses adequate in determining potential geologic and seismic impacts of the proposed project and analyzed alternatives.

The comment also requests a structural feasibility report for a retrofit of the existing library to allow for construction of a lower floor. Please see response to comment AL-8, on page 182, which states that a subterranean expansion was considered as part of the Master Planning process. This option was rejected from further consideration for a variety of factors, including a requirement of substantial additional funding and the fact that it did not meet most of the project sponsor objectives. Therefore, structural feasibility reports for a retrofit of the existing library building under such a scenario were not prepared.

Alternatives

Comment AL-1: Comments stating that the EIR fails to analyze a reasonable range of feasible alternatives.

“CEQA requires the DEIR to evaluate a range of potentially feasible alternatives capable of ‘substantially lessening’ significant adverse impacts on historic resources, while meeting most of the stated project objectives. The DEIR fails to adequately explore other potentially feasible alternatives, including a

northerly expansion addition, a below-ground addition, and/or a combination thereof.” (*Mike Buhler, Executive Director, San Francisco Architectural Heritage, E-mail, October 12, 2010*)

“I write to provide comments on the Draft Environmental Impact Report (DEIR) prepared for the above-named project. As an architectural historian in private practice, I believe that the North Beach Library, a qualified historic resource, is an excellent candidate for rehabilitation and I would have hoped that alternatives in the DEIR would have been further developed. For the reasons listed below, I believe that the DEIR is incomplete, inadequate and lacking in not properly analyzing the programmatic and economic feasibility of the alternatives.” (*Katherine Petrin, E-mail, October 12, 2010*)

“The DEIR is inadequate and incomplete (1) in failing to consider any feasible alternatives to the Playground Master Plan that would not require the demolition of the existing library and (2) in failing to objectively consider any preservation and expansion alternatives that would accomplish most or all of the Project Objectives. Further, as explained below, the Preservation and Northerly Expansion Alternative has not been adequately explored in the DEIR and appears to be the most feasible alternative that would attain the basic objectives of the project while avoiding the significant impacts of the proposed project. This alternative must be considered and the DEIR re-circulated. ...

“The DEIR Fails to Objectively Consider Preservation and Expansion Alternatives that Would Accomplish Most or All of the BLIP Objectives.” ...

“But, even worse, the same entity that is pushing this Draft EIR through and has spent an amount of money on architectural plans without even really exploring a solid alternative in renovation and upgrading the S.F. Public Library has let our changing little neighborhood library get defaced, become unkempt ... almost in anticipation of trying to get people to not see its charm. This is very disheartening. I urge you to see the potential in this building ... to see how important it is that have a true viable alternative to consider—one which would actually present renovation and upgrading of the North Beach Appleton Wolfard Library with integrity. There are, indeed, so many other issues ... such as why we would build a new library on a busy street—instead of keep it where it is ... back away from the main area of traffic ... for example.” (*Sarah Kliban, Letter, October 12, 2010*)

“Why were we not entitled to a fair and detailed alternative to tearing down the existing library to build a new one? (Yes, this building needs upgrades ... what other building of this era doesn’t? (*Sarah Kliban, Letter, October 12, 2010*)

“The DEIR is inadequate because it did not evaluate the very viable alternative, the existing library that could be expanded and developed into a wonderful alternative.” (*Mary Lipian, E-mail, October 12, 2010*)

“The bias in the aesthetic resource analysis begins with the cover of the report, which manages to exclude public ROW scenic views of Co it Tower, SSPP Church, and Transamerica Pyramid which characterize views of and across the site from Columbus Avenue.

“The most important sequence of views is that from the north waterfront toward the site. At Lombard Street the landmarks of North Beach become visible because of the absence of structure at the site. A 180 degree view opens up, announcing the neighborhood at the actual upsloping of and to North Beach.

“The statement that the proposed project would ‘fill the visual void in the Mason Street, Columbus Avenue, and Lombard Street streetwalls’ is to ignore the value of open spaces and views, a perversion of understanding of urban design and urban form. It is precisely this void which has public aesthetic value.

“The views provided are self-serving. An unbiased analysis would consider the views most important to those who visit and appreciate the site. A random sample of schoolchildren or strangers would yield a more honest result. Such survey and assessment of visual quality is how legitimate environmental analysis for aesthetics is prepared at the Federal level.” (*A.L. Kienker, E-mail, October 12, 2010*)

“It is well recognized that an overly narrow definition of project objectives undermines the purpose of CEQA by foreclosing consideration of less harmful alternatives. With regard to the proposed project, the list of seventeen project objectives is so narrowly drawn that it appears no single preservation alternative could possibly meet them all.

“For example, one stated objective is to ‘Ensure safe and efficient passage of the public between the library and the North Beach Playground amenities’... Based on this criterion, the Northern Expansion alternative is rejected from further consideration in the DEIR, and the Southerly Expansion alternative is deemed to not meet the project goals. It appears that no preservation alternative could fully meet this objective, as it effectively requires the existing library to be demolished. Similarly, the objective to ‘Ensure that key library program elements are on one floor for the efficiency of staff and materials processing’ inherently disadvantages preservation options because the existing library has multiple levels. (It is worth noting that the proposed replacement building is split into two levels and would not fully meet this objective either.)

“Perhaps most arbitrary is the objective to ‘Minimize or avoid disruptions to library service while the proposed library is under construction.’ All preservation alternatives, both considered and rejected, fall short of this objective because they would require the existing library to close during renovations. However, the San Francisco Public Library has a long and successful history of using bookmobiles during branch renovations. In fact, according to the library website, six branches are using them right now.

“We acknowledge that the project sponsor has many laudable objectives regarding programming, accessibility, and safety; however these goals cannot simply be assumed to be superior to the value of the historic resource. CEQA requires that a project to have significant negative environmental impacts not be approved if economically feasible and environmentally superior alternatives exist.” (*Mike Buhler, Executive Director, San Francisco Architectural Heritage, E-mail, October 12, 2010*)

Response AL-1

The commenters generally state that the DEIR failed to analyze feasible alternatives or alternatives that would meet most of the project sponsors objectives.

The EIR is fully adequate in its analysis of a reasonable range of alternatives. As stated on DEIR p. 206, the EIR need only set forth “those alternatives necessary to permit informed public participation and reasoned choice by decision-making body” (CEQA Guidelines Section 15126.6(f)).

As stated in Section 15126.6(f), “The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” The DEIR presents four alternatives—the No Project Alternative, the Preservation and Rehabilitation Alternative, the Preservation and Southerly Expansion Alternative, and the Three-Story Library (701 Lombard Parcel) Alternative. The first three alternatives would avoid the proposed project’s significant impact to historic architectural resources. As stated on page 235 of the Draft EIR, the Three-Story Library Alternative assumes demolition of existing library building, and thus this alternative would, like the proposed project, result in a significant, unavoidable impact on historic architectural resources. However, the Three-Story Library Alternative would reduce the magnitude of the project’s less-than-significant effects on the Mason Street view corridor.

As stated on p. 213 of the DEIR, the Preservation and Rehabilitation Alternative would not meet most of the project sponsor’s objectives, but it would meet some—including provision of a library compliant with seismic standards and ADA accessibility. As stated on DEIR p. 224, the Preservation and Southerly Expansion Alternative would meet even more of the objectives, including expansion of the library, provision of a seismically sound building, and provision of an increased civic presence along Columbus Avenue, although it would not meet the objective of improving overall playground visibility and access or moving the children’s play area to a more protected location. Both alternatives would preserve the existing library building. As stated on p. 232, the Three-Story Library (701 Lombard Parcel) Alternative would also meet most of the project sponsor’s objectives. However, as noted above, this alternative would not avoid the significant and unavoidable impact to historic resources that would occur under the proposed project, because this alternative would entail demolition of the existing library.

Please see response to comment AL-4, on page 173, regarding requests for further exploration of the Preservation and Northerly Expansion Alternative, which was rejected from further consideration.

Regarding requests for additional alternatives for Phase 2 of the proposed project, as stated in response to comment AL-5, on page 178, the project would result in less-than-significant impacts to recreation. Therefore, analysis of alternatives to Phase 2, which is limited to renovation and reorganization of playground features, is not required under CEQA.

Comment AL-2: The EIR’s analysis of alternatives is biased.

“Mason Street’s closure is an independent issue that can occur in any design option. Additional open space from a street closure does not mitigate loss of open space and playground space in the proposed Master Plan.” (*Howard Wong, AIA, E-mail, October 12, 2010*)

“The DEIR Lacks Objectivity and is Biased in its Use of the Proposed Park Master Plan to Reject Feasible Alternatives to the Demolition of the Historic North Beach Branch Library.

“In spite of the lack of a finite project description for the proposed Playground Master Plan and the DEIR’s failure to consider alternatives to the Master Plan’s proposed major reorganization of the outdoor

park features, the proposed Master Plan is used as a foil against which to reject feasible alternatives to the demolition of the existing NB Library, as if the Master Plan had already been adopted. This is an underlying and pervasive lack of objectivity that defines this DEIR.

“By way of an example, in its discussion of the Preservation and Rehabilitation Alternative, the DEIR assumes, without any basis, that unless the existing library is demolished, the Playground would not be renovated and the triangle parcel at 701 Lombard would continue to function as a parking lot (pg 13), implying that the existing library must be demolished so that the Master Plan can be accomplished.

“Throughout the DEIR, the justification for building a new library on the triangle parcel at 701 Lombard, as opposed to expanding and renovating the existing library, relies on the proposed SFRPD’s Playground Master Plan. Yet the Library’s pre-CEQA commitment to building a new library on the triangle parcel appears to have preceded the development of a new Master Plan for the re-arrangement of the outdoor spaces of the playground.

“Of all of the other BLIP projects to date, how many have involved the adoption by the Recreation and Park Commission of a new Master Plan for the park in which the library was located? ...

“The DEIR’s consideration of the Preservation and Rehabilitation Alternative is not objective in that it assumes that the park would not be renovated and that the Triangle would continue to be a parking lot.

- (a) Explain why the DEIR assumes that the Playground would not be renovated (Page 13)? Please set forth the basis of this assumption. The children’s playground could still be moved and the playground spaces otherwise reorganized and improved when there is sufficient funding. The DEIR admits that the existing Master Plan is conceptual at this point anyway.
- (b) Explain why the DEIR assumes that the triangle parcel at 701 Lombard would continue to function as a parking lot (Page 13)? Please set forth the basis of this assumption. The triangle parcel could be developed into green open space, preserving the existing trees and views. This alternative should be considered with and without the inclusion of Mason Street in the new triangle park.

“The DEIR concludes that open space would be lost under this [Preservation and Rehabilitation Alternative] alternative in comparison to the Triangle library plan because an elevator on the exterior of the existing library building would encroach onto the existing outdoor recreation space. This does not seem factually accurate or objective. Please revise this conclusion based on the following facts:

- The amount of “open space” that the footprint of the triangle library would occupy is 6,180 sq ft.
- The footprint of the existing library with the addition of the elevator would be 4,620 sq ft (library is 4,400 sq ft plus 220 sq ft [assuming the DEIR is correct that the elevator would measure 10 ft x 22 ft.].
- Thus, the Preservation and Rehabilitation Alternative would actually provide at least 1,560 sq feet MORE open space than the proposed project. ...

“The DEIR also concludes that an exterior elevator would require the loss of one tennis court because the tennis court could not be moved to the Triangle lot. This makes no sense since the proposed Master Plan design shows all three tennis courts moved to the east by 40 feet clearly leaving enough room for a elevator and a ramp from Greenwich to the playground. Why is this not mentioned in the DEIR discussion of the exterior elevator in this alternative?

“Several of reasons listed on pages 213-214 of the DEIR for rejecting this [Preservation and Rehabilitation Alternative is] alternative are not adequate or convincing, or represent bizarre distortions of the *General Plan*: ...

- (a) The reason that ‘*it would not increase the library’s civic presence along Columbus Avenue*’ is 1) entirely subjective and debatable (see our comments on Aesthetics), and 2) has nothing to do with historic preservation.
- (b) Another reason given is that ‘*it would not increase open space.*’ As explained above, the Preservation and Rehabilitation Alternative would actually provide at least 1,560 sq feet MORE open space than the proposed project.
- (c) An even more absurd reason given is that ‘*because the existing library would be retained, this alternative does not assume the library footprint would be available for open space on the playground. This alternative would not further General Plan Recreation and Open Space Policy 2.4, which calls for the gradual removal of non-recreational uses from parks...*’ The triangle is open space and was acquired for that purpose. How would building a new library on the triangle parcel further this policy? This line of reasoning is dishonest, legally incorrect and extremely biased.” (*Vedica Puri, Letter, October 12, 2010*)

Response AL-2

The commenters state that the DEIR lacks objectivity and is biased in favor of the proposed Master Plan in determining whether specific alternatives meet project sponsor objectives.

Comments stating that the DEIR is biased are noted. The Draft EIR identifies and evaluates a reasonable range of alternatives, consistent with CEQA and the CEQA Guidelines; it not biased, as discussed below.

Master Plan Description and Components

The DEIR does not assume that the Master Plan has been adopted. To the contrary, as stated on DEIR p. 50, in order for the project to be approved, the Recreation and Park Commission would have to adopt the playground Master Plan, and the Library Commission would have to approve the final location of the proposed North Beach Branch Library. As stated in the Project Description on Draft EIR p. 28, the 701 Lombard Street parcel was endorsed as the preferred location by the San Francisco Public Library Commission. Therefore, that location is studied in the EIR as the proposed project.

There are a total of five libraries that are located within parks—North Beach, Marina, Parkside, Western Addition, and Ortega. A playground Master Plan is not required for library renovation or replacement-in-kind. Given the proposed construction of the new North Beach Branch at

701 Lombard Street, and the demolition of the existing building to create 4,400 square feet of open space, the San Francisco Public Library and the San Francisco Recreation and Park Department jointly developed a Master Plan with the community to determine the use of that space within the context of the entire playground.

Regarding a “lack of a finite project description” for Phase 2 of the Master Plan, please see response to comment PD-4, on page C&R-47. As stated there, although the final design of the playground under Phase 2 of the proposed project has not been determined, sufficient information and description of the range of possible physical changes exist to analyze that stage of the project under CEQA. The project description in the EIR is adequate, and is in accordance with CEQA Guidelines Section 15124, which states that the project description “should not supply excessive detail beyond that needed for evaluation and review of the environmental impact.” In terms of project components, Section 15124(c) states that the project description include a “general description of the project’s technical, economic, and environmental characteristics, considering the principal engineering proposals, if any, and supporting public service facilities.” Such information is included in the EIR project description.

Regarding requests for additional alternatives for Phase 2 of the proposed project, pursuant to CEQA, the alternatives were chosen and analyzed primarily because they would avoid the project’s significant impacts or lessen the project’s less-than-significant impacts. The project was found to result in significant and unavoidable impacts to historic resources, not to recreation. It was also found to encroach on the Mason Street view corridor, but not to the extent that a substantial adverse aesthetic effect would result, and thus this impact was determined to be less than significant. As stated in response to comment AL-5, on page 178, the project would result in less-than-significant impacts to recreation. Moreover, none of the physical changes proposed for the playground was found to result in significant adverse effects with respect to other environmental issues. Therefore, analysis of alternatives to Phase 2, which only includes renovation and reorganization of playground features that would result in less-than-significant impacts, is not required under CEQA.

Preservation and Rehabilitation Alternative

Some comments state that the Preservation and Rehabilitation Alternative should have included the development of the 701 Lombard Street Parcel with open space, relocation of the children’s playground, vacation of Mason Street, or other project components. Currently, separate plans or proposals to undertake these actions do not exist. Therefore, the Preservation and Rehabilitation Alternative appropriately does not assume that they would be undertaken. Moreover, assuming that none of these actions would take place under the Preservation and Rehabilitation Alternative provides for the most conservative comparison of proposed project impacts.

The Preservation and Rehabilitation Alternative is not “rejected” in the DEIR. It is analyzed as a feasible alternative. The DEIR does state that this alternative would not meet most of the project sponsor’s objectives. The EIR is an informational document—the ultimate decision to approve or reject any project rests with the San Francisco Planning Commission, Public Library Commission, Recreation and Park Commission, and the Board of Supervisors.

The commenter's opinion that the Preservation and Rehabilitation Alternative could increase the civic presence along Columbus Avenue is noted. The commenter's statement that civic presence has nothing to do with historic preservation is also noted. The project sponsors' objective to increase the civic presence on Columbus Avenue, however, is stated in DEIR p. 29. The DEIR Alternatives analysis includes a summary of the extent to which each analyzed alternative would meet the sponsor's objectives.

Preservation and Northerly Expansion Alternative

Please see response to comment AL-4, on page 173, regarding requests for further exploration of the Preservation and Northerly Expansion Alternative, which was rejected from further consideration.

Development of Open Space Under Alternatives

Regarding development of open space under the Preservation and Rehabilitation, Preservation and Southerly Expansion, and Three-Story Library alternatives, as stated in the DEIR on p. 207, "all of the alternatives discussed below could be constructed with Mason Street vacated, Mason Street narrowed, or Mason Street open as under existing conditions. For the purposes of drafting alternatives for comparison, scenarios with the street vacated or fully open were chosen for each alternative." The development of open space on the 701 Lombard Street parcel was considered in connection with potential vacation of Mason Street and its development as open space, as well as the overall building footprints that would be created or expanded under each alternative.

Therefore, for comparison purposes of each component of the project to alternatives, 701 Lombard Street was analyzed as an existing parking lot in the Preservation and Rehabilitation Alternative, given the alternative's focus on maintenance of existing conditions at the project site and building footprint. Nevertheless, the analysis of the Preservation and Rehabilitation Alternative states, on Draft EIR page 214, that if "open space and passive recreational uses were ultimately developed on the [701 Lombard Street] parcel with Mason Street's geometry left in existing conditions, about 4,119 square feet of open space use could be developed under this alternative," an area that is equivalent to the existing parking lot. The Draft EIR (p. 214) also states that about 7,260 square feet of open space could be developed with narrowing of Mason Street, and about 13,800 square feet of open space could be developed if Mason Street were closed. (The commenter's reference to a potential for 6,180 square feet of open space is evidently a reference to the new library footprint under the proposed project.) The 13,800 square feet is approximately 1,800 square feet more open space than would be added by the proposed project, owing to the difference in the footprints of the existing library building and the proposed new library building. The Draft EIR does not state that the Preservation and Rehabilitation Alternative would not allow for the foregoing potential increase in open space on the 701 Lombard Street parcel (and, possibly, within the Mason Street right-of-way). However, the Draft EIR does state, as noted above, that this alternative would not meet most of the project sponsor's objectives. It is worth noting that there would be no project under analysis, and therefore no EIR, were there not a proposal to replace the existing library in order to "[e]xpand the North Beach Branch Library, providing enough space to accommodate adequate shelving for more books and other materials, fixed computers, seating, and tables; separate distinct areas for adults, teens, and children; a program room for library and community use; and additional staff work space" (first Project

Objective, Draft EIR p. 29). Nevertheless, the decision-makers could choose to implement the Preservation and Rehabilitation Alternative as part of their consideration of the proposed project.

The 701 Lombard Street parcel was analyzed as open space under the Preservation and Southerly Expansion Alternative, given that this alternative would result in new or expanded building footprints that would displace recreational use.

Regarding the acquisition of the 701 Lombard Street parcel for the purposes of developing open space, or analyzing the existing Mason Street right-of-way as open space, please see response to comment PD-1, on page 35. Pursuant to CEQA and to recent case law, the 701 Lombard Street parcel must be analyzed as a parking lot under existing conditions because CEQA requires a comparison to *existing physical conditions*, not to entitled or otherwise planned conditions.³⁰

Mason Street must be analyzed as a street. Therefore, development of the library on 701 Lombard Street would not result in the loss of physical open space, and Mason Street's vacation is not intended to "mitigate" the loss of such open space.

Comment AL-3: The EIR should analyze conceptual site plans or designs for an Eastward Expansion Alternative, or excavation of a basement level in an alternative.

"The EIR does not include an alternative which expands down and into the site, without unnecessary conflicts or expansion into existing recreational areas. This missing alternative is consistent with the General Plan and a program of seismic upgrade, warranting study." (*A.L. Kienker, E-mail, October 12, 2010*)

"Further, the DEIR did not analyze the, Preservation and Northerly Expansion Alternative (PNEA) at an appropriate programmatic and economic level of detail for inclusion in the above-requested matrix. Years ago, local architect and Consortium member Zach Stewart (now in his 80's) had a conversation with Mr. Appleton, of Appleton-Wolfard, who said: 'The North Beach Library has a secret.' After prompting, Mr. Appleton revealed the secret: 'The North Beach Library is expandable' Because of the sloped site, a partially excavated lower level can be inexpensively adapted for additional library space. Local architect and Consortium member Howard Wong has generously donated his professional services to the Friends of the Appleton and Wolfard Libraries (FAWL) in providing the attached more detailed site plan showing a modified PNEA which fully takes advantage the library's partially-excavated lower level. The Consortium concurs with the FAWL, endorses the modified PNEA and requests the Department analyze the modified PNEA at the same level as the other alternatives to permit informed public participation as well as an informed and reasoned choice by the decision-making body. Mr. Wong is available to provide the Department with all information needed to analyze the modified PNEA as an alternative. The modified PNEA not only provides a feasible alternative that would retain both the North Beach Branch Library and the Joe DiMaggio Softball Fields, but is also in compliance with nearly all of the Project sponsor's objectives." (*Vincent Marsh, San Francisco Preservation Consortium, E-mail, October 12, 2010*)

"The EIR should also evaluate an alternative that includes excavation and expansion of the library's existing partial basement level. Such an addition could easily accommodate the library's programmatic

³⁰ See footnote 2, p. C&R-35.

needs without any disruption of the playground recreation areas. If needed, a below-ground addition could be combined with leveling out the existing main floor level and/or a pop-up addition on the north end of the roof to maximize useable square footage. Some flexibility for interior alterations is allowed based on the inventory of character-defining features in the Planning Department's Historic Resource Evaluation Report, with only the open floor plan, glulam beams, chimney, mantle and fireplace, and red brick masonry walls identified as protected features. The addition of ground floor windows on the east elevation looking out onto playground space could allow in natural light; such an alternative could also include sunken light well off Mason Street for additional light. A below-ground addition would actually be at grade on the eastern elevation, taking advantage of the sloped site. This arrangement would then allow for ground level universal access at both the north and east elevations.

"There are numerous successful examples of libraries across the country that have benefitted from below-ground additions. The Avery Library Annex at Columbia University, completed in 1977, is a two-story building with skylights and an asymmetrical layout of lounges, classrooms and reading rooms 30 feet below ground. In Los Angeles, the Central Library includes an eight-story, 500,000 square foot addition, with four levels below grade and a skylit atrium providing natural light all the way down to the lowest level. The DEIR does not mention any possibility of below ground expansion, and we believe that such an alternative clearly warrants detailed consideration in the Final EIR." (*Mike Buhler, Executive Director, San Francisco Architectural Heritage, E-mail, October 12, 2010*)

"The HPC believes the preservation alternative analysis of the report is inadequate and needs further evaluation. The proposed alternatives do not go far enough to "substantially lessen" any significant adverse impacts to a historic resource. Specifically, the report should include an additional preservation alternative that comes closer to meeting the project objectives of creating a functional, compact library. An alternative that includes both an addition, potentially at the east of the library, and the excavation of the basement level should be studied." (*Charles Chase, Historic Preservation Commission, Letter, October 25, 2010*)

"Daniel Burnham had a plan in 1905, he said we should connect all these parks down here with Coit Tower, and he had three blocks of the City decimated by stairways and gardens and none of it got built, even after it all burned, nobody would build it. We do have a chance, though, from Joseph Conrad Square at one end of Columbus Avenue up past all the little triangles that were cut off by Columbus Avenue, which was finagled through Built San Francisco in the 1870's, they actually condemned properties and cut that street through. You come up past DiMaggio Playground, then Washington Square, you keep going, you find a flock of books that were put there recently, an Arts Commission project when they re-did the Broadway Corridor, beautiful books flying in the air, solar powered from the roof of City Lights. You continue on, you get down to Redwood Park next to the Transamerica Pyramid, North Beach is a wonderful place, so let's not put a cork in the bottle, not just yet.

"If you look at the DiMaggio Playground plan, the library sits here with an unused understory space. Part of it could be a Rec Center, about 360 square feet, part of it could be a program room, about 700 square feet, two means of egress, one past the bathrooms down at this playground level where the tennis courts and the tot lot are in the middle between the pool, or new staff space here adjacent to the staff space that is in the existing library at that level. When you go up from that existing lower library, the staff level, you come into the main reading room of the Appleton and Wolford Library. In this plan, we would not do

anything other than upgrade the finishes as they were originally intended, replacing in kind and restoring where possible. There is a solution that meets the ADA, it can be accessibly upgraded.” (*Joseph Butler, Public Hearing Transcript, October 7, 2010*)

“In conclusion, we believe there are feasible alternatives to the demolition of the historic North Beach Library that will meet and exceed the goals of the Library Program and Rec Park. We urge and ask the department to revise the EIR to more fully consider these alternatives.” (*Gerry Crowley, Public Hearing Transcript, October 7, 2010*)

“With a fresh view of the HPC comments, an architect has created a universally accessible, seven thousand square foot, single story, light-filled library entered on quiet, leafy Lombard Street while leaving the historic Appleton intact! Since the developer (and I) have tried to solve this puzzle for two years, I am astounded at the brilliance of his scheme. He has had extensive experience inserting new construction underneath historic buildings as the Europeans do. He worked on the insertion of the new building under the historic Palace of the Legion of Honor.” (*Zack Stewart, Letter, October 9, 2010*)

“Further, the community deserves a modern Library, and as such the EIR needs to be objective and thorough, but there are presently no preservation alternatives that fill that bill. As such the DEIR is subject to challenge unless as part of the comments, the Consultant includes a preservation alternative that makes both the best public Branch Library and the best public Park, with the physical assets the site affords:

- Views from Columbus Avenue approaching from the north of the North Beach monuments, Coit Tower and the Spires of the Sts. Peter and Paul Church on Washington Square.
- integrated accessible circulation with the adjacent streets and public schools surrounding the Library and its Recreation Center in the Park.
- an existing two story branch library sited such that its lower floor could be part of the playground; providing accessible circulation and restrooms and a Program space and Recreation Center.

“Attached please find an architectural Preservation Alternative Library and Park Scheme that meets all of the project objectives except one: that as an alteration and addition, the North Beach Library patrons will experience a disruption of services during the “Project”. They are Sheets AO.1, Site Plan; A 1.1, Greenwich Street Plan; A 1.2, DiMaggio Field Plan; A2.1 East or DiMaggio Field Elevation.

“The scheme is a compilation of the work of several architects, and several different schemes prepared for the Project by the Architect of Record for the New Triangle Library and others. The scheme leaves the existing Browsing and Reading Room as is, and provides accessible circulation by a system of ramps on the East side of the existing building. Elevators and restrooms are also accommodated, and the facilities are segregated such that the Library or the Rec Center could be closed, but the other use could function as well alone.

“Four doorways are cut into the East elevation of the Appleton Wolfard Library at the main and lower levels. This affords a connection between the Eastern addition and the Existing Library. This scheme does not eat up square footage that would prevent moving the tennis courts and tot lot as does one EIR alternative. Nor does it plug the opening between the two existing buildings on the site, the Library and

the North Beach Pool, as does another. Neither of these two preservation alternatives are adequate to the project objectives, as there are too many problems each scheme presents that ruin the Library functionally and the Park aesthetically.

“We respectfully request to have our attached Preservation alternative included in the EIR; either in place of one, or alongside the others.

“URBAN DESIGN

“This gap between the buildings is key to providing the best possible Park design, while at the same time modernizing the Library. None of the of the schemes preserves this gap and as such the best Park option is not present in the EIR. Maintaining the Gap allows uninterrupted views from Columbus Avenue of the Towers of North Beach, while adding one of its own. The 44 foot high Cast art glass baseball bat marks the seam between Park and Library, the circulation up to Greenwich Street, and the new restrooms in that part of the park. Lit from within by PV panels on the new building’s roof would provide a new towering landmark both of and for the place.

“On the West side of the scheme, the Columbus Avenue sidewalk is widened by the Bus Stop (which moves 200 feet down Columbus) adding more dimension to a tight corner. Additionally, widening the sidewalk shortens by 20 feet the 64 feet wide crosswalks. The crossing for the Yick Wo elementary school students will be made 25% safer by reducing the distance to be traveled on the short light. These Students and their teachers must cross Columbus to use the Library/Playground.

“On the North side of the scheme the bocce courts move slightly to the North, maintaining their North South orientation, the optimal layout orientation. On the south side, the tennis courts move into the southernmost portion of the site, allowing a tot lot in the center between the courts and the pool. A new accessible ramp brings visitors from the Southern corner down into the playground where accessible restrooms are located. Additionally some part of Greenwich could be closed to traffic (or not) but handicapped accessible parking spots there could accommodate all who wish to use the Library and the Park.

“FUNDING

“Due to the extensive ramp structure and its enclosure, the preservation alternative Library attached as proposed will be 11,350 square feet. 2,592 square feet of that are the Ramps, leaving 8,770 square feet for the library facility. This is comparable to the Triangle Library size. But the Triangle Library, or “Project” has overstuffed its site, and will be impossible to add to in the future. Its Park related amenities are further from the heart of the Park, and it forever walls off damage Field, rather than show it off.

“As Scotland Street is a one block dead end alley between Filbert and Columbus, it could be mapped north another 400 feet and the improvements on Scotland (between the library and the pool) could be funded by DPW Street Improvement monies from the sales tax revenues, or the Mayor’s Office of Disability Funds.

“Architect Zach Stewart once had a conversation with Mr. Appleton, of Appleton-Wolfard, who said: “The North Beach Library has a secret.”

“After prompting, Mr. Appleton revealed the secret: “The North Beach Library is expandable.” Because of the sloped site, a partially excavated lower level can be less expensively adapted for additional library space, and given the surfeit shared with the Recreation and Parks Department. Those portions not assigned for Library use can be funded by other means at other times.

“PROGRAM

“The Scheme attached provides:

| <u>Function</u> | <u>Square feet</u> |
|------------------|--------------------|
| Teen | 450 |
| Children | 950 |
| Adult | 1510* |
| Program | 700 |
| Staff | 500 (upper level) |
| Staff Lounge | 200 (lower level) |
| Staff work areas | 700 (lower level) |

*This area is 400 square feet shy of the Program for the Project

“The Addition provides a 5,735 square foot floor plate at the Main Reading Room and Browsing Levels (formerly the Program Room) compared to 6180 for the triangle site.

“This schematic version could undergo design changes to add the square feet if necessary to the functioning of the North Beach Branch as a 21st Century Library. From the Circulation desk one can see all the entrances and exits on the floor, the doors to the bathrooms and elevator. This addition makes the most of the Appleton & Wolfard Branch Library, while simultaneously enhancing the Park surrounding it, and making North Beach’s newest place one that the Community can be proud of.” (*Joseph Butler, October 12, 2010*) ***Conceptual plan attached to comment letter and included in Attachment 1 of this document***

“The several architects volunteering their time on the DEIR review observe that the intent of the library was to expand the existing library and several examples of how to do this are included in the DEIR. The structural report in the library records and the professional opinions of the volunteer structural engineers show an ingenious way to accomplish this: a long, low one story library offering universal access and a quiet entrance on Lombard Street can be larger than the ground floor of the proposed triangular building, not compromise the open space on Columbus Avenue, provide adequate computer lab space, and preserve the historical library above it. This type of restorative expansion is common in European cities and is becoming more common in American cities. It is preferable in urban areas to ruining the open space. The new triangular building is more suburban in concept—jamming itself in a space that needs trees.” (*Zach Stewart, Letter, October 2, 2010*).

“The alternatives considered do not appear to include one that has been repeatedly promulgated by a neighborhood group, Friends of Appleton and Wolfard libraries, and was part of the architect’s plan, according to one attendee at public meetings on North Beach landmarking: Zach Stewart: scooping out space beneath the existing footprint.

“We understand that a letter from S. F. Architectural Heritage provides some successful examples of such below-ground additions at two other U.S. libraries, Columbia University and L.A. Public Library. We note that San Francisco Public Library certainly would know about this possibility from its own renovation experience—the Noe Valley Branch renovation, which was completed about three years ago, included addition of space within the existing footprint by scooping out space in the lower level for such things as new and spacious rest rooms, elevator, telecom closet, and related access.” (*Peter Warfield, Executive Director, Library Users Association, E-mail, October 12, 2010*)

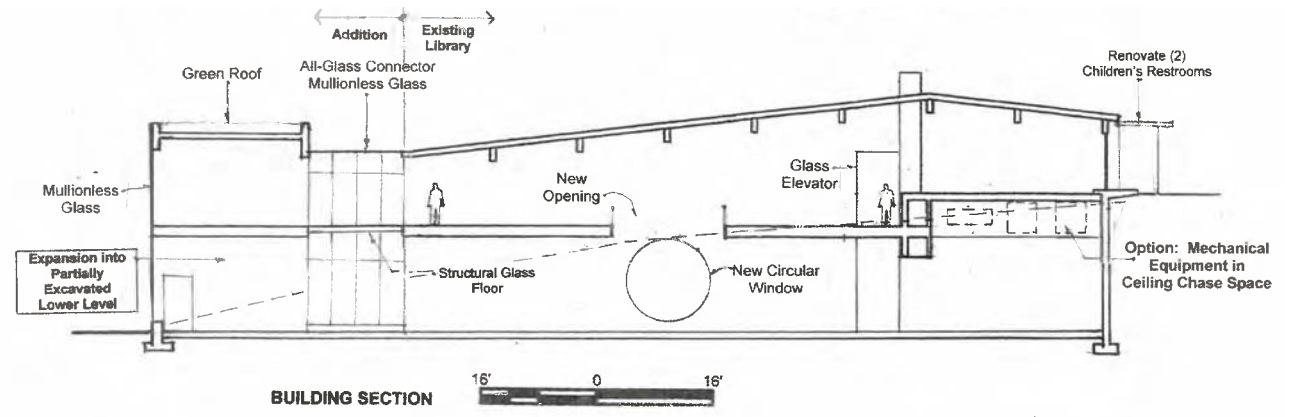
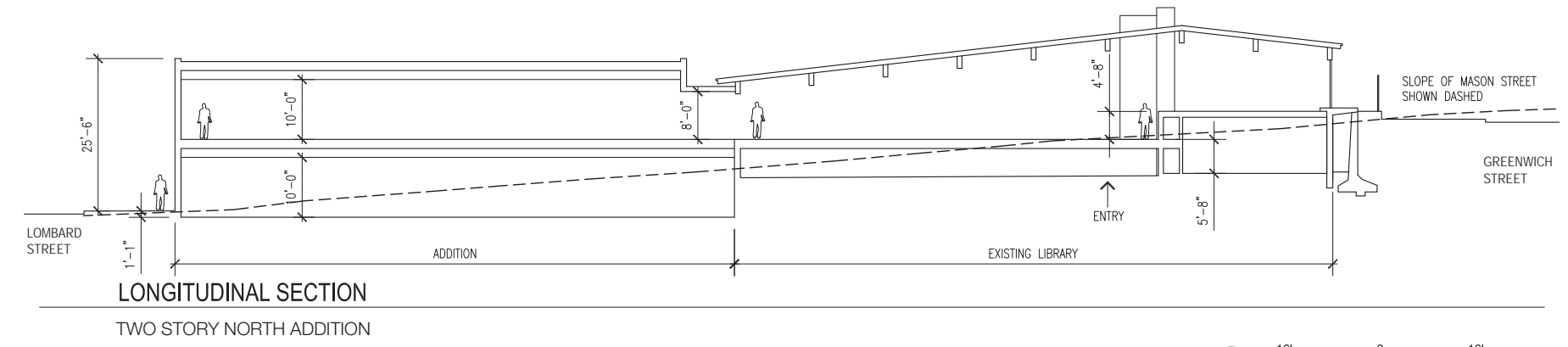
Response AL-3

The commenters generally suggest, or specifically provide, additional alternative designs for analysis in the EIR, including an eastward expansion alternative and/or a subterranean expansion alternative.

One comment states that the EIR should evaluate “an additional preservation alternative that comes closer to meeting the project objectives of creating a functional, compact library” and that specifically “includes both an addition, potentially at the east of the library, and the excavation of the basement level.” Subterranean expansion to the east was considered as part of the Master Planning process. As stated in the DEIR on p. 241, an underground level extending eastward beneath the area of the children’s play area was considered; however, this alternative was deemed too disruptive to Joe DiMaggio Playground, as it would require closure of at least the tennis courts for the duration of construction. Additionally, it would be difficult to provide for natural light in the underground expansion area because installing skylights in an active playground would likely interfere permanently with use of the playground itself. Moreover, this underground level was evaluated in the context of constructing a new branch library building, not enlarging the existing library.

Alternatives that would require excavation of a full basement level were preliminarily evaluated by the library design team and dismissed from further consideration for the reasons described below.

As shown in Draft EIR Figures 54 and 55 (pp. 243 – 244), the existing library building has a partial lower level that is located beneath the library’s “browsing” area, which is up half a flight of stairs from, and approximately 4.5 feet higher than, the library’s main floor level. The existing partial basement, which is used as staff work space, has a ceiling height of less than 10 feet—substantially lower than the ceiling heights on the upper level of the library, which range between about 10 and 17 feet. Below the library’s main floor is a crawl space that shares a floor level with the partial basement. However, because the main floor is lower than the elevated “browsing” area, the height of the crawl space is only 3.5 feet (see the upper image in **Figure C&R-6**, which reproduces one of the Preservation and Northerly Expansion Alternative sections from Draft EIR Figure 55). Accordingly, to create a usable lower floor, excavation would be required to lower the floor level of the crawl space by more than 8 feet (assuming a 12-foot ceiling height), and the floor level of the existing partial basement would also have to be lowered, but by only about 2 to 3 feet.



C&R-165

SOURCE: Leddy Maytum Stacy Architects (t); Howard Wong, AIA (b)

2008.0968E: North Beach Public Library . 206352.01

Figure C&R-6
Comparison of Northerly Addition Building Sections

Such excavation would undermine the existing foundations of the library building. This would necessitate shoring and bracing the existing building to essentially suspend it over the excavation work, and the construction of a completely new foundation to support the building after completion of the excavation and construction of the new lower level. Given the structural insufficiencies of the building—extensively documented previously (see, for example, Draft EIR p. 26) and, indeed, one of the major reasons for undertaking the project in the first place—it is not entirely certain that such a shoring and bracing operation could be successfully undertaken without resulting in extensive alterations, and possibly damage, to the building. Moreover, excavation itself would require removal of portions of the eastern wall of the existing building, adjacent to the tennis courts, to gain access for earthmoving equipment to conduct the excavation activities. It would also likely require dismantling some of the building interior to provide sufficient space for earthmoving equipment to maneuver. Removal of portions of the exterior wall and of the building interior could potentially alter the historic integrity of the building, resulting in a significant impact without a program for removal, storage, and reinstallation of the building features most important to its historic significance. Such reconstruction would add substantially to the complexity of the project. As with other multi-story concepts for the existing library building, it would also be necessary to add an elevator, either within the existing building or on the exterior. Finally, the excavation work would also result in the closure of at least one of the tennis courts during excavation and, likely, during construction of the lower level.

An excavation and construction program such as described above has not been assessed in detail by the library design team, because the designers determined early in the process, based on their knowledge of the building's condition and of construction practices, that such a program was likely to be infeasible due to both technical and cost considerations.

The foregoing discussion applies, in particular, to the alternative identified by Commenter Joseph Butler, who provided suggested floor plans (attached to his comment letter in Attachment 1 of this document). Moreover, it is not clear that the easterly expansion, suggested in this alternative to accommodate accessibility ramps, would be in conformance with the *Secretary's of the Interior's Standards for Rehabilitation*, as this addition would result in converting part of the existing eastern exterior wall to an interior wall and would substantially alter the massing of the existing building. While it is true that the existing eastern elevation is not the library building's primary facade, this façade nevertheless retains character-defining features of the Appleton and Wolfard library design, such as the projecting roof eaves, stacked bond masonry, and strong vertical fenestration pattern, and these features would be obscured by the proposed easterly addition.

Conversely, the Preservation and Southerly Expansion Alternative described in the Draft EIR would not result in substantial alterations to the existing library building facades. As concluded by Planning Department preservation staff, "the series of setbacks from the primary elevation of the historic library proposed in the Southerly Expansion Alternative allow the existing library to convey its historic massing and overall setting."³¹

³¹ Frye, Tim, Planning Department Preservation Technical Specialist, "Memorandum: 2000 Mason Street – The North Beach Branch Library DEIR Preservation Alternatives, Case No. 2008.0968E," June 20, 2010. This document is included in Appendix C of the Draft EIR.

The discussion about excavation beneath the existing library also applies to a Preservation and Northerly Expansion Alternative identified by commenter Howard Wong, who provided suggested floor plans and a section plan, in terms of the need for extensive excavation. The comparison between the section plan provided and the existing building section plan (see Figure C&R-6) makes clear the extent of additional excavation that would be required. (This Preservation and Northerly Expansion Alternative, including Mr. Wong's suggested design for such an alternative, is discussed further in the response to Comment AL-4, p. C&R-173.)

Concerning “below-ground additions” to libraries generally, the examples cited by one commenter are not germane to the proposed project. The four-story underground portion of the Los Angeles Central Library is part of a completely separate wing (with four additional above-grade levels) added adjacent to the original library building; no major construction was undertaken beneath the original building as part of that project. Moreover, the scale of the Los Angeles project—the addition itself encompassed 300,000 square feet of floor area—is orders of magnitude different than the proposed project, and the fact that a large part of a building adjacent to the Central Library was constructed underground does not imply that adding a below-grade addition to the North Beach Library is feasible. The Avery Library expansion at Columbia University in New York City is a fully underground structure, built beneath an outdoor courtyard and connected to the original 1912 Avery Library building by an enclosed, skylit staircase. This project, likewise, does not imply that a below-grade addition to the North Beach Library is feasible.

An above-grade Eastward Expansion Alternative was also rejected from further consideration, as described on DEIR pp. 246 and 248, because it would result in the removal of two tennis courts and shade the pool and clubhouse. Although this alternative would avoid the proposed project's significant, unavoidable impacts on historic architectural resources, this alternative was judged to result in substantial and potentially adverse impacts on the playground, including the pool and clubhouse. Therefore, it was not carried forward for further analysis in the Draft EIR.

Regarding statements that the proposed alternatives do not go far enough to “substantially lessen” any significant adverse impacts to a historic resource, the Preservation and Rehabilitation Alternative leaves the existing building primarily intact, with some modifications for ADA-compliant access. The Preservation and Southerly Expansion Alternative was also found to avoid the project's significant and unavoidable impacts to historic resources. Please also see response to comment AL-4, below, regarding the Preservation and Northerly Expansion Alternative.

Regarding the comment that the alternatives analyzed in the EIR do not sufficiently address project objectives, as stated in the response to Comment AL-1, the alternatives analyzed in the Draft EIR, the Preservation and Southerly Expansion Alternative would both meet most of the project objectives and avoid the project's significant impact on historical resources. Other alternatives evaluated, except the No Project Alternative, would also meet some or most project objectives.

As stated in response to comment AL-2, on page 156, the EIR need only set forth “those alternatives necessary to permit informed public participation and reasoned choice by decision-

making body” (CEQA Guidelines 15126.6(f)). As stated in the CEQA Guidelines, “the alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project.” CEQA does not require the City to analyze every conceivable alternative or idea, as long as the EIR provides a reasonable range of alternatives that reduce or avoid significant impact(s).

Concerning “views from Columbus Avenue” of Coit Tower and Sts. Peter and Paul Church, inasmuch as the EIR does not identify a significant impact on aesthetics, no alternatives (or mitigation measures) are necessary to address aesthetic impacts or views.

The EIR analyzes a reasonable range of alternatives, as required by CEQA, notwithstanding the alternatives suggested by some commenters. Even if these commenter-recommended alternatives were determined to be feasible, the EIR authors believe the analysis remains adequate because, as noted, the EIR analyzes alternatives that would both avoid significant impacts and meet most of the project objectives. The Planning Commission will make the final decision as to whether the EIR provides a reasonable range of alternatives for analysis.

Comment AL-4: The Preservation and Northerly Expansion Alternative should be analyzed instead of rejected from further consideration.

“The optimal environmental direction would preserve an acknowledged historic resource, renowned multipurpose softball fields and a significant triangle open space contiguous to Columbus Avenue. Preservation designs can also best satisfy programmatic goals for a larger library, more open space and a larger playground--and should be equitably and professionally evaluated. Preservation designs are code-compliant, while a new Triangle Library is non-code compliant—requiring rezoning, spot zoning and construction of 19’-6” into a public-right-of-way.” (*Howard Wong, et al, Flyer, October 7, 2010*)

“The Environmental Impact Report needs to study several things, 1) that we do have an acknowledged historic resource, and it can be renovated and expanded. There are alternative designs that have not been explored, some of them you have seen a glimpse of tonight, but also, the entire lower level expansion of the existing library is very very possible because Mr. Appleton, the architect who designed it, once told an 80-year-old architect who grew up in our neighborhood, who works in our neighborhood, that this library has a secret, and that secret is the library is expandable. Also, the library can be extended, not southward, necessarily, but northward, with a smaller addition. I will be submitting a plan also to the process, showing that there is a possibility of a 12,000 square foot library which would be a renovation and an addition, much larger than the new 8,500 square foot, two-story, triangle library, which is very inefficient, it has over 43 percent inefficiency ratio as an international library consultant told us when he evaluated the project.” (*Howard Wong, Public Hearing Transcript, October 7, 2010*) ***Drawings were separately submitted and accompany commenter’s written comments in Attachment 1 of this document***

“I have given ideas that were never mentioned. i.e.; 1). Start on Lombard Street North of the existing library and go up 12-15 feet and as wide as the existing library. Build south until contact is made with the existing library. Both are at the same level as the bottom floor of the existing library. 2). Starting in the Toddler area of the playground or the upper part of the existing library, open the inside of the upper part of the library and add it to the children’s area. Now the children can come inside if it’s too hot or if it’s

raining. This use would be year long. 3), the roof of the new building is converted in an open space bocce ball court (rooftop court) and attached to the Toddler area. Entrance to the bocce ball courts would be on Columbus Ave. Existing two bathrooms are in toddler area. This is a simple plan that would add approximately 8,500 square feet to the existing library and still keep 8,500 square feet of roof top open space. This also provides the library room to grow and fit in with libraries master plan to have all the services on one floor. ...

“I say that, if we remodel the old one, bring it all the way down to Lombard Street, put the Bocce balls on the top, we’d have a better library.”

“Historic preservation of the existing Appleton Wolfard Library, along with an Addition, would create a much-larger, flexible library at a lower cost---with a high ratio of assignable library space.” (*Sal Busalacchi, Letter, October 12, 2010; Public Hearing Transcript, October 7, 2010*)

“On page 246, the HPC disagrees with why the reasoning for rejection of the northern expansion / addition. The HPC believes that an addition that is aligned with or placed in front of the existing building can be found compatible to the historic resource (as evident for the case at Parkside, and the Marina Public Libraries).

“The HPC disagrees that an addition on the northern side would cut off the existing recreation area from the ‘Triangle.’” (*Charles Chase, Historic Preservation Commission, Letter, October 25, 2010*)

“The DEIR is inadequate and incomplete (1) in failing to consider any feasible alternatives to the Playground Master Plan that would not require the demolition of the existing library and (2) in failing to objectively consider any preservation and expansion alternatives that would accomplish most or all of the Project Objectives. Further, as explained below, the Preservation and Northerly Expansion Alternative has not been adequately explored in the DEIR and appears to be the most feasible alternative that would attain the basic objectives of the project while avoiding the significant impacts of the proposed project. This alternative must be considered and the DEIR re-circulated. ...

“The Northerly Expansion Alternative has not been well explored in the DEIR and may be the most feasible alternative that would attain most of the basic objectives of the project and would avoid the significant impacts of the proposed project. The reasons listed on page 246 of the DEIR for rejecting this alternative are not adequate or convincing: ...

- 1) “The first reason is that ‘*the expansion would not be visually subordinate to the existing library because it would be built to the lot line at both Mason Street and Lombard Street.*’ Does this mean that the addition would dominate the existing library and somehow damage its integrity? We believe a design is possible that would be much more compatible than the additions to the fronts of the Merced and Marina Branch Libraries, which the Planning Department found to be compatible. Further, it is not clear that a northerly addition would have to extend to the lot line at Lombard Street in order to accommodate the SFPL’s space needs (discussed below). So this first reason for the rejection of the Northerly Expansion Alternative is unconvincing. Figure 57, purporting to show the Northerly Expansion Alternative in perspective view is a plainly biased, boxy and non-objective rendering of a design envelope.

- 2) The second given reason against the northern alternative was that this addition would cut off the existing recreation area from the Triangle. This is a larger design issue that is a 1) subjective and debatable, and 2) has nothing to do with historic preservation.
- 3) The third given reason against the northern alternative is that it would diminish visual permeability into and through the site by creating a continuous building wall that would reduce the ability to survey the site from Powell Street and Columbus Ave. Remarkably, this is exactly what the proposed new library on the triangle would do. So this reason for the rejection of the Northerly Expansion Alternative is absurd.

“A well-designed Northerly Expansion Alternative would not only include a renovation meeting ADA requirements and the current SF Building Code requirements for seismic safety, but it would also respect the visual context of the surrounding neighborhood, allow for relocating the children’s play area and reorganizing and improving the outdoor park facilities, and would provide for the addition of almost 1/3 acre of connected new green space (the triangle parcel and Mason Street).

“As to additional space needed, the Northerly Expansion Alternative would only need to be large enough to (1) add the additional space necessary to match the net increases that the proposed new library would provide (from Table 2 on Page 42)—234 linear feet of additional shelves, 14 more computers, and 16 new seats; (2) provide separate areas for adults, teens, and children; a program room for library and community use; and additional staff work space. Given that the addition would be a rectangular space instead of a triangular space, a more efficient use of space would be possible.

“Because a well-designed Northerly Expansion Alternative would meet most of the basic project objectives while avoiding the proposed project’s significant impacts to historic architectural resources, the DEIR must be revised to include a Northerly Expansion Alternative.

“This alternative would be the most ‘feasible’ alternative that is capable of being accomplished within a reasonable period of time, taking into account economic, environmental, technological and legal factors.

- 1) Technologically, as acknowledged in the DEIR, this alternative would include a renovation meeting ADA requirements and the current SF Building Code requirements for seismic safety.
- 2) Legally, it would avoid the controversial issue of using the triangle parcel at 701 Lombard, condemned by the City for open space use, as a building site and would be consistent with the SFPL’s plans to renovate the existing library at the time of the voter approved bond issues which would fund this project.
- 3) Environmentally, it would avoid the demolition of a historic building and would be the ‘greenest’ and inherently the most sustainable alternative. Also, the renovation would be undertaken to meet energy efficient guidelines.
- 4) Economically, rehabilitation would be less expensive than a new building and the project could be accomplished without delays that may be caused by intense neighborhood controversy surrounding this project.” (*Vedica Puri, Letter, October 12, 2010*)

“Ignores obvious preservation alternatives that are vastly superior to the southern expansion it evaluates. A northern expansion and/or a lower level expansion are superior and serve more of SFPL’s goals. Use of

the partially excavated lower level permits eastern windows and a door to the adjacent playground. This should be discussed.” (*Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010*)

“I think the main one is that people felt that, although the preservation alternative that was picked as superior was a good preservation alternative, but that the superior preservation alternative is the addition to the North because, as Commissioner Haas pointed out, functionally, an L-shaped building is going to be very difficult to work with, and a straight addition to the north is going to be a much easier building to run.

“Additionally, the two main reasons for not choosing that as the preservation alternative seemed to be very, shall we say, flimsy reasons, one of them being that it was aligned with the other building, and that that would impact the historic resources, but then, the Parkside Library additions aligned with the older building, and that doesn’t impact the resource. The Merced Branch and Marina Branches have the addition in front of the building, and they claim that that doesn’t impact the historic resource, and the resource still retains integrity, so to have the building aligned with the existing building seems – that is the state-of-the-art these days, so, to me, that disappears as an objection, and the only other objection was that it cuts off the playground from the triangle park.

“Well, it seems to me that, you know, it is debatable about how this land is used, but the triangle park in and of itself is about the right size for a public square, so you would want to cut it off from the playground. So, that gets into a land use issue outside of our purview, but I don’t think that’s a reason to not do the addition, I don’t think it’s a reason to drop that particular – to not look at that particular alternative seriously.” (*Alan Martinez, Public Hearing Transcript, October 7, 2010*)

“The Draft EIR is inadequate and incomplete because it fails objectively to explore and analyze feasible alternatives to expand and upgrade the existing library to meet the goals of the BLIP, the Branch Library Improvement Program. Most significantly, the EIR rejects out of hand all potential preservation northerly expansion alternatives that could clearly meet all of the goals for a new expanded library, yet the EIR fails to look at these in enough detail to justify their rejection.” (*Gerry Crowley, Public Hearing Transcript, October 7, 2010*)

“The EIR purports to discount this preservation alternative, contending that it would be visually subordinate to the existing library if built to the lot line at Mason Street and Lombard Street. (EIR at 246.) Could not the addition be shortened to allow setback from Lombard? If not, why not?

“Since Mason Street will be vacated, isn’t it irrelevant whether the addition is built to “the lot line”? Could not the addition be set back from the Mason Street open space preferable?

“The Preservation/Northerly Expansion alternative should be drawn with an angled roof to complement the existing library architecture. Please amend the provided drawing at Figure 57 to make the addition smaller while retaining square footage that is comparable to the proposed project.

“The EIR’s other contention regarding infeasibility of the alternative is that the expansion would add substantial building mass along the building’s western edge. This will in fact make the playground safe and protected, which is one of the project objectives. Access could be easily accomplished via the

connection between the existing library and the expansion, and will also be facilitated by setback from Lombard Street from a shortened footprint, as suggested above.

“In terms of the visible permeability contended to render this alternative infeasible, isn’t it true that this is not a project objective? The expansion could and should be designed to enhance the library architecture and be a positive visual feature. If not, why not?”

“This design of this alternative could also be amended to move the playground area to the center of the site, and the tennis courts to the Columbus Avenue side, if preferred, could it not?”

“Isn’t it true that this alternative is feasible and meets project objectives while avoiding adverse impacts to the historic library?”

“Does this alternative also preserve open space and recreational uses on the triangle consistent with the property’s acquisition restrictions?”

“Should not the EIR be amended to select the Preservation and Northerly Expansion alternative, with appropriate design improvements as noted above, as the environmentally superior alternative? If not, why not?”

“This alternative should receive enhanced study as an EIR alternative, and should be removed from the ‘considered but rejected’ category.” (*Susan Brandt-Hawley, E-mail, October 12, 2010*)

“The DEIR did not analyze the Preservation and Northerly Expansion Alternative (PNEA) at an appropriate programmatic and economic level of detail. The existing building presents interesting design possibilities. Extending the footprint of the existing library building toward the southeast corner of Lombard and Mason streets is a logical design that could include a north-facing second floor reading room with good light and engage Lombard Street in a way that cannot happen due to the void that is the bocce courts space. A seismic strengthening scheme would be cost effective by tying an addition to existing structure. The North Beach Library provides excellent opportunities for reuse. Not only would the City retain a historic resource, but it is architecturally compatible with the North Beach Pool and would keep a reusable building out of landfill.” (*Katherine Petrin, E-mail, October 12, 2010*)

“While a northern addition alternative is described in the DEIR, it was not carried forward for detailed consideration because it ‘would not meet most objectives of the proposed project.’ However, based on our review, it appears that the Preservation and Northerly Expansion Alternative would meet the vast majority of project objectives. Indeed, only two of the seventeen project goals listed would not be attained. Certainly, the EIR should fully explore the feasibility of a northerly expansion alternative, modified as described below.

“The DEIR rejects the northern addition alternative because it would ‘diminish the visual permeability into and through the site by creating a continuous building wall.’ Under CEQA, findings of alternative feasibility or infeasibility must be supported by substantial evidence.’ This determination is neither substantiated with adequate documentation, nor is it a universally accepted urban design theory. As noted by members of the HPC in its review of the DEIR, one could easily argue that having the triangle parcel defined by an expanded building and enclosing the public space is better urban theory: Additionally, the

DEIR presents a massive block rendering as a northern addition, perceivably designed to maximum height and bulk. A northern expansion alternative should be developed in consultation with the HPC that is more compatible with the scale of the historic library and also more permeable in appearance.

“The Preservation and Northerly Expansion Alternative is also dismissed because it would purportedly ‘result in the displacement of at least one feature’ [bocce ball courts] of the existing playground that could not be relocated onto 701 Lombard Street due to size and topographic constraints. Despite this assertion, it appears that the bocce ball area could be relocated to the triangle parcel through tiering and other creative landscape design solutions. Unlike the other recreational uses, we are not aware of an imperative to locate the bocce ball courts adjacent to the children’s play areas.” (*Mike Buhler, Executive Director, San Francisco Architectural Heritage, E-mail, October 12, 2010*)

Response AL-4

The comments generally express support for a Preservation and Northerly Expansion Alternative, which was considered but rejected from analysis in the DEIR (pp. 241–246). Commenters suggest specific designs, provide drawings, and question the reasoning why this alternative was considered but rejected from environmental impact analysis.

The Preservation and Northerly Expansion Alternative would be located in a Public Use District and the 40-X Height and Bulk District, and would not conflict with the existing P zoning or height and bulk district on the playground; it would be a permitted use. It would, however, physically divide the existing playground. As stated in the DEIR on p. 246, the Preservation and Northerly Expansion Alternative would create a physical barrier to access across the site. A building is a tangible, physical barrier. Therefore, the creation of that physical barrier under the Preservation and Northerly Expansion Alternative is not considered “subjective” or “debatable,” as stated by some of the commenters, even as it is acknowledged that such a barrier would not rise to the level of a significant impact.

Although impacts to land use and aesthetic character would be less than significant, a wall between two portions of the playground not only is considered undesirable because it would diminish visual permeability across the site, but it also would separate the playground into distinct pieces, in contrast to the proposed project, which would create a more integrated expanded playground that would include the 701 Lombard parcel.

Comments stating that the proposed project would block views from Columbus Avenue and Powell Street into the playground to the same extent and in the same manner as the Preservation and Northerly Expansion Alternative would block such views are not correct. The proposed project building at 701 Lombard Street would block views into the playground from Columbus Avenue directly adjacent to, and northwest of, the proposed library. But the project would increase visual permeability from the intersection of Greenwich Street and Columbus Avenue and from the intersection of Mason Street and Columbus Avenue. It would also increase visual permeability from the intersection of Lombard Street and Mason Street. Moreover, the proposed building at 701 Lombard Street would not block views from Powell Street into the existing playground.

In comparison, the Preservation and Northerly Expansion Alternative would block views into the existing playground from the entirety of Columbus Avenue, and preservation of the existing library would continue to block views into the playground from Greenwich Street at Mason Street, along Mason Street and at Lombard Street and Mason Street. The existing building and the expansion would block views of the triangle parcel portion of the playground from Powell Street. The difference is that the proposed project would place a building at the edge of the expanded playground, whereas the Preservation and Northerly Expansion Alternative would place a building within the playground.

Figure 57, on p. 247 of the DEIR, which shows a perspective view of the Preservation and Northerly Expansion Alternative, is not intended to be a design-level rendering. As stated in the EIR, this alternative was rejected from detailed analysis. Therefore, a design-level rendering was not prepared. It is possible that an addition could be smaller than the massing shown in Figure 57, but the smaller the addition were made, the lesser the square footage that would be available for the library addition. Also, the open space abutting this addition would not be readily programmable due to its shape and size.

Similarly, although the northerly addition could be designed to be somewhat smaller than shown on DEIR p. 247, the division of the playground into separate pieces still would result. This impact to recreation would be less than significant, but such a division would not occur under the proposed project. Moreover, it is not clear that the bocce courts, which would be displaced by the northerly addition, could be relocated within the project site; at a minimum, grading and construction of retaining walls would be required to create a flat surface within the 701 Lombard parcel.

Also, as stated on DEIR p. 246, the building addition in the Preservation and Northerly Expansion Alternative would not be visually subordinate to the existing library, as would the building addition in the Preservation and Southerly Expansion Alternative. Comments stating that the northern expansion would not reduce the historic integrity of the existing library express a difference of opinion and are noted. Findings of the historic integrity of other branch libraries with additions are not necessarily applicable to the North Beach Branch Library. The North Beach Branch Library has a different topographical setting than other libraries, and therefore the DEIR reasonably determined that the Preservation and Southerly Expansion Alternative would be less obtrusive than the Preservation and Northerly Expansion Alternative. For this and other reasons stated above and in the DEIR, this alternative is rejected from further consideration.

Impacts of the Preservation and Northerly Expansion Alternative to other CEQA impact categories, including traffic, noise, air quality, biological resources, hazardous materials, and wind would not substantially differ from those of the proposed project and the Preservation and Southerly Expansion Alternative, as it is assumed that the library square footage would be comparable. Like the Preservation and Southerly Expansion Alternative, the northerly expansion would create more shadow on the existing Joe DiMaggio Playground than would the proposed project, although effects would be less than significant.

As stated in response to comment AL-1, on page C&R-153, and AL-3, page C&R-164, the DEIR does not need to include every possible alternative, but only a reasonable range of alternatives to inform public participation and decision-making. The DEIR does include two alternatives that eliminate the significant impact on historic resources and satisfy at least some of the project sponsor's objectives, including the provision of an expanded library and maintenance of all of the playground features.

It is noted that, as shown in Figures 54 through 56, the operational efficiencies involved in operating a library across multiple levels would be continued under a Preservation and Northerly Expansion Alternative. (These inefficiencies would also be continued under the Preservation and Southerly Expansion Alternative). Although the building with a northerly expansion would not be an L-shape, it would still function across multiple vertical levels in the existing library building, which would adversely affect operational efficiencies. Comments stating that this alternative would meet other project sponsor objectives, such as the provision of adequate program areas and shelf space, are acknowledged.

Regarding comments requesting the Northern Expansion Alternative be combined with a rooftop recreation area, please see p. 250 of the DEIR. As stated there, construction of public open space on top of the library would not be considered feasible. It would require a 10-foot-tall fence, which would further diminish the ability of the addition to remain subordinate to the existing library structure pursuant to the *Secretary of the Interior's Standards for Rehabilitation*, thereby reinforcing the EIR's conclusion that a northerly expansion would be less desirable than a southerly expansion in terms of effects on historical resources. Also, SFPL and SFRPD are separate agencies with different mandates, which could lead to jurisdictional complications.. The Rooftop Playground Alternative was rejected from further consideration. Please also see the Vertical Expansion Alternative on p. 248, which discusses that opening up the roof of the existing library would not be consistent with the *Secretary of Interior's Standards*.

At the end of the day, the EIR preparers considered two preservation and expansion alternatives—one that would expand the existing library to the north, and one that would expand it to the south. It was the reasoned opinion of Planning Department preservation staff that the southerly expansion would be a more appropriate addition to the historic building because it would be less disruptive to the building's principal Columbus Avenue/Mason Street façade. Based on this reasoning, the Preservation and Southerly Addition Alternative was selected for full analysis in the EIR. Nevertheless, the Preservation and Northerly Addition Alternative was included in the EIR, in both text and figures. Ultimately, even if the Preservation and Northerly Expansion Alternative were found to be feasible, in terms of meeting project objectives, the fact that it was analyzed in a somewhat different manner from other alternatives (including the analysis provided in this Comments and Responses document) does not render the EIR inadequate because the Preservation and Southerly Expansion Alternative (as well as the Preservation and Rehabilitation Alternative) would avoid the project's significant impacts to historical resources while meeting most of the project objectives. Thus, the EIR meets the requirements of CEQA.

It can be debated whether a Preservation and Northerly Expansion Alternative should include a flat roof (whether usable as open space or not) or a sloped roof, should have a single-story addition (whether at the same level as the existing building's main floor or lower) or a two-story addition, whether the street wall of an addition should extend north to Lombard Street or not. (As explained in the response to the previous Comment AL-3, subsurface expansion of the existing library building is likely to be infeasible, however.) These design considerations do not alter the fact that the EIR properly identified an alternative—the Preservation and Southerly Expansion Alternative—that would avoid the project's significant impacts while meeting most of the project objectives.

Regarding the sustainability of the Preservation and Northerly Expansion Alternative as compared to the proposed project, please see responses to comment AL-9, p. C&R-182. Regarding the relative cost of alternatives and the project, please see responses to comment AL-12, p. C&R-191. Please see response to comment AL-5, on page 178, regarding alternatives for Phase 2 of the proposed project. Regarding assignable space under each alternative, please see response to comment AL-14, on page 193.

Regarding the eminent domain proceedings for acquisition of the 701 Lombard Street parcel, please see response to comment PD-1, on page 35. Please see response to comment PD-2, on page 39, regarding library bond programs.

Concerning “preserv[ing] ... open space,” as noted elsewhere (for example, the response to Comment PD-1, page C&R-35), the existing condition of the so-called Triangle parcel at 701 Lombard Street is its use as a surface parking lot, and not as open space, notwithstanding the City having acquired this parcel for use as open space. The existing use is parking, and therefore that is how 701 Lombard is analyzed, in accordance with CEQA.

Concerning a “code-compliant” alternative, please see the response to Comment AL-16, page C&R-194.

It is noted that the section plan submitted by commenter Howard Wong (see lower image in Figure C&R-6, p. C&R-165) underestimates the amount of excavation required for the Northerly Addition by showing the northern wall of the addition essentially at the level of the existing Mason Street grade (depicted by a dashed line, as in the section plan of the existing building). In fact, according to a site survey, the Mason Street grade at the north wall of the addition (approximately 35 feet north of the existing library building's north wall, according to the scale in the section plan provided) is only about three feet below the grade at the existing library's north wall, meaning that the floor level of the northern addition would be about 9 feet below the Mason Street grade (assuming a lower-level floor-to-ceiling height of about 12 feet). Therefore, glazing on the Mason Street façade would be above eye level and would be limited to, at most, the upper three feet of the lower level, which would result in minimal natural light being available on this side of the lower level.³² (The reader can compare this section plan to the section plans in Figure 55 of the Draft EIR, p. 244, which show that the Mason Street grade would be

³² It is acknowledged that the plans submitted by commenters are not intended to be fully accurate, and the discussion presented here is intended as a conceptual review of these plans. As such, dimensions are acknowledged to be approximate.

approximately level with the ground floor of a lower-level addition at a distance some 90 feet north of the wall of the existing library building, while the northern third of such an addition would be largely below grade.) Moreover, even a northerly addition with a smaller footprint than shown in Figure 55, as suggested by Mr. Wong, would, like the Preservation and Northerly Expansion Alternative described in the DEIR, compete with the historic massing and setting of the existing library due to the location and topography in relation to the existing building. And, as discussed in the response to Comment AL-3, extensive excavation would be necessary beneath the existing library building to construct a Preservation and Northerly Expansion Alternative that includes a full lower level, with attendant potential for substantial alteration of the building, and this concept was judged by the library design team to likely be infeasible due to both technical and cost considerations.

Comment AL-5: Alternatives should have included various options for redevelopment of the playground in Phase II of the project.

“The HPC believes the DEIR is inadequate because it does not adequately evaluate reasonable re-location, re-organization, re-planning and re-use options for the recreational and open space areas of the site in order to come up with a better preservation solution / option for the library to the same degree that these areas are studied, re-planned and re-organized in the actual project.” (*Charles Chase, Historic Preservation Commission, Letter October 25, 2010*)

“Another significant inadequacy is the EIR’s failure to look at the alternative Master Plan schemes for the park. Instead of taking a look at an alternative park plan configuration that would meet Rec Park’s goals, it uses only one proposed Master Plan as the basis to reject all of the preservation alternatives. This is supposed to be an EIR of the Master Plan, as well as the library, so why were alternative park plans not analyzed? The EIR makes it clear that the Library staff committed long ago to demolishing the existing library, and then developed the Master Plan for the park to fit their predetermined outcome.” (*Gerry Crowley, Public Hearing Transcript, October 7, 2010*)

“A primary inadequacy with the DEIR is that, although it purports to be an EIR on the Joe DiMaggio Playground Master Plan (page 28) as well as on the North Beach Branch Library project, it fails to analyze any feasible alternative master plans for the ‘*reorganization of and improvements to the outdoor features of Joe DiMaggio Playground*’ that would accomplish most or all of SFRPD’s objectives. The DEIR only analyzes alternative plans for the library.

“Please add to the EIR at least two feasible alternatives to the proposed Playground Master Plan that would accomplish most of the Project Objectives that relate to the outdoor features of Joe DiMaggio Playground. These include the following Project Objectives (from the list on pages 29 and 30 of the DEIR):

“Objective 1 ‘Improve Joe DiMaggio/North Beach Playground, providing a safer and more protected area for the children’s play area, more green space than currently exists, and ensure compliance with ADA requirements.’

“Objective 2 ‘Maintain all currently existing park program elements, including bocce courts, soft ball field, four-squared courts, basket ball courts, tennis courts, the children’s play area, and the North Beach Public Pool and Clubhouse.’

“Objective 3 ‘Enhance connectivity between park amenities.’

“Objective 4 ‘Increase recreational open space.’

“Objective 5 ‘Minimizes disruption to the community, the library and park operations.’ ...

“As to Project Objective 1, above, to provide ‘a safer and more protected area for the children’s play area,’ the DEIR describes the existing play area as being ‘protected from the street’ and ‘only partially visible from nearby streets’ (Page 98). Explain how the existing play area is not ‘safe.’ Please consider alternatives to moving the children’s play area, while enhancing its safety, if that has been a problem. [See more the extensive discussion of the impacts of moving the children’s play area below.]

“As to Project Objective 2, above, to ‘maintain all currently existing park program elements,’ the proposed Master Plan reorganization would decrease the multipurpose hardscape area (containing the softball field, four-squared courts, basket ball courts) by a significant number of square feet and would eliminate the regulation sized softball field. Please consider alternatives that would not decrease the size of the multipurpose hardscape area. ...

“The DEIR’s consideration of feasible alternatives to the proposed Playground Master Plan for the ‘reorganization of and improvements to the outdoor features of Joe DiMaggio Playground’ must be based on an independent survey of park use to determine the relative numbers of users of: (1) the multipurpose hardscape area, (2) the tennis courts, (3) the children’s play area, and (4) the bocce courts.” (Vedica Puri, Letter, October 12, 2010)

Response AL-5

The commenters generally request analysis of additional alternatives of Phase 2 of the proposed project. The DEIR found that the proposed project would result in less-than-significant impacts to recreation because the Master Plan would not “substantially degrade existing recreational resources.” The purpose of alternatives analysis is to avoid or otherwise lessen significant project impacts (CEQA Guidelines Section 15126.6(a)). Given Phase 2 of the project would not result in significant impacts with respect to recreation or other environmental issues, analysis of alternatives for Phase 2 is not required.

Regarding child safety related to relocation of the children’s play area, please see responses to comments PD-6, on page 53, and RE-5, on page C&R-94. As stated there, under the proposed project, the relocated children’s play area would be closer to staff and caregiver supervision. As stated on DEIR p. 45, the proposed project would move the play area would be moved to the center of the block to be farther away from surrounding streets. This movement would help to meet the project sponsors’ objective to provide a “safer and more protected area for the children’s play area,” and it would allow for visual surveillance of the children’s play area by guardians who are in what is now the playground’s “lower” level.

Regarding the decrease in size of the multipurpose hardscape area, please see response to comment RE-1, which states that the area is not used for formal softball games. Please also see **Table C&R-1** on p. C&R-91, above, which describes existing and conceptual future square footages of playground features. The commenter also requests analysis of alternatives that do not reduce the size of the multipurpose hardscape area. Please see the No Project Alternative and the Preservation and Rehabilitation Alternative analysis, on DEIR pp. 208–217. Both alternatives would not affect the size of the 'multi-purpose hardscape area. Please note that the project would increase the children's play area by +/- 4,000 square feet.

Comment AL-6: The Alternatives analysis was inadequate or cursory.

"Inadequate study of alternative site and/or plans. ...

"Alternative studies: In this DEIR the studies given to other alternative are negligible and the focus has been to destroy a landmark and build a new building. The project sponsors seem to have tunnel vision and have given a cursory opinion of alternative proposals. Others have given ideas and I see no in depth studies of alternative studies." (*Sal Busalacchi, Letter, October 7, 2010*)

"The alternatives are treated too superficially, in my opinion." (*Joan Wood, Public Hearing Transcript, October 7, 2010*)

"And one of the most important things is that it does not even consider preservation alternatives properly." (*Sue Cauthen, Public Hearing Transcript, October 7, 2010*)

Response AL-6

The commenters generally express the opinion that the analysis of alternatives is not adequate. Commenters state that the analysis of alternatives was not sufficiently in-depth or superficial.

As stated on pp. 207 and 208 of the DEIR, an EIR need not describe or evaluate the environmental effects of alternatives in the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project (CEQA Guidelines Section 15126.6(d)). The DEIR does this for the four alternatives presented. The Planning Commission will determine whether the analysis is adequate for the purposes of CEQA.

Please see also the responses to other comments on alternatives, in particular, responses to Comments AL-1 through AL-5, pp. C&R-153, C&R-156, C&R-164, C&R-173, and C&R-178, for additional information on the adequacy of the alternatives analysis.

Comment AL-7: Comments expressing support for the Preservation and Southerly Expansion Alternative or another version of a library addition at the existing playground combined with open space development at 701 Lombard Street.

"The Preservation & Southerly Expansion Alternative (Alternative 3) is a Feasible Alternative to Demolition: Of the alternatives fully evaluated in the DEIR, Alternative 3 (Preservation & Southerly

Expansion) appears to be the environmentally superior option. This option would not only preserve the North Beach Library, but would also achieve the vast majority of the sponsor's project objectives.

"Alternative 3 would construct an approximately 4,300 square foot, single-story addition to the south, in the location of the existing outdoor (currently closed) reading area and a portion of the children's play area. The existing library would be renovated. The DEIR rejects this option as infeasible because it would purportedly reduce the size of the children's play area. It is our opinion that relocation of the recreation areas described in the Master Plan have not been creatively explored in this alternative. For example, if the tennis courts were *moved* to the south (as contemplated in the proposed project plan) then the playground could be located beside the pool clubhouse and library (also where it is placed in the proposed project plan). The bocce ball courts could remain where contemplated by the project plan or moved to the triangle." (Mike Buhler, Executive Director, San Francisco Architectural Heritage, E-mail, October 12, 2010)

"On the other hand, I heartily favor and would support alternative plans that would expand and update the present Library at much less cost, and would allow the Triangle to remain as open space." (June Osterberg, Letter, October 12, 2010)

"As to Project Objective 1, above, to provide '*more green space*,' as well as Project Objective 4 to '*increase recreational open space*,' almost 1/3 acre of new green space could be added by developing SFRPD's triangle parcel along with the area within Mason Street while preserving the existing mature trees on the triangle site. This new green *open space would be designed to 'ensure compliance with ADA requirements.'* Implementation of the Master Plan as proposed would forever foreclose the opportunity to add a contiguous 1/3-acre of new green open space. Please consider this alternative to accomplishing SFRPD's objective to providing '*more green space*.' In stark contrast and in conflict with this objective to provide '*more green space*,' the proposed Master Plan would pave over 50–60 % of the vacated area of Mason Street."³³ (Vedica Puri, Letter, October 12, 2010)

Response AL-7

The commenters express support of development of open space on the triangle parcel and in the Mason Street right-of-way. As stated in the EIR on p. 207, all of the alternatives could be constructed with Mason Street vacated, Mason Street narrowed, or Mason Street fully open. Closure of Mason Street, and development of that parcel and the 701 Lombard Street parcel with recreational uses, appears to be advocated by the commenter. It is noted that the EIR states that the 701 Lombard Street parcel could be used for future open space under any alternative, including the No Project Alternative, except alternatives that would build on this parcel.

As discussed under response to comment AL-5, on page 178, the proposed project would have a less-than-significant impact on recreational resources. Therefore, alternatives discussing other reorganizations of playground features and development of open space on the project site are not required.

³³ As to the proposed Master Plan improvements for the vacated portion of Mason Street, the DEIR states: "*SFRPD currently estimates that the area could include between 40 and 50 percent plantings, with the remainder either permeable paving or impermeable surfaces.*" (Page 45)

The net change from existing recreational open space to open space for each feature under the proposed project is described in **Table C&R-1** on p. C&R-91, above.

Contrary to one commenter's statement, the EIR does not find the Preservation and Southerly Expansion Alternative to be infeasible. The only discussion of infeasibility in regard to this alternative concerns the potential for active (as opposed to passive) recreational space on the 701 Lombard Street parcel (page 226), due to the slope of this parcel and the retaining walls that would be required if this parcel were to be graded flat.

Comment AL-8: Comments expressing dissatisfaction with preservation alternatives.

"Some seem to think that the existing library building is an historic architectural resource and apparently have proposed, as described in the draft EIR, a "Preservation and Rehabilitation Alternative. Such a proposal is attempting to preserve what is a painfully regressive, quite ordinary building. We encourage demolition of the structure rather than trying to mitigate the effect of its demolition. It is difficult to fathom why its preservation might call up any support. San Franciscans and our community deserve better." (*David W. Martin and Kathleen M. Martin, Letter, October 7, 2010*) **Comment letter includes attachment of 1956 letter from Joseph Moore to George Christopher, which is included in Attachment 1 of this document.**

"While the Appleton & Wolfard buildings embody the principles of mid-twentieth century American public library design, the North Beach Branch in particular, has not stood up to the challenge of urban public library evolution. The Appleton & Wolfard design is lovely to look at, in most cases-though not in North Beach-but leaves very little room for books, computers, materials or people for that matter (as you can see in the attached pictures)! Tacking on additions will ruin the lines of mid-century simplicity without making the space more flexible." (*Deborah Doyle, E-mail, October 12, 2010*)

"I've used the existing library for 50 years, and for much of that time, it has been cramped and inadequate. Expanding it to provide additional space would simply result in an unattractive, ungainly inadequate facility. At the same time we would lose a rare opportunity to gain additional open space that would benefit everyone in the neighborhood." (*June Fraps, E-mail, October 10, 2010*)

"Some wish to retain the existing library building as an historic architectural resource proposing, as described in the draft EIR, a 'Preservation and Rehabilitation Alternative.' Such a proposal is attempting to preserve what is an ordinary building, not a particularly great library design in terms of functionality, with little exceptional character or beauty. We support demolition of the structure rather than trying to keep it as is with some alterations. Our community deserves better." (*Gyongy Laky and Thomas Layton, E-mail, October 10, 2010*)

"I strongly support preserving buildings if at all feasible, but in this case, preserving and renovating the existing building, even with an addition, would not create a modern, usable, efficient, state-of-the-art library. The US Secretary of the Interior's Guidelines for Rehabilitation of Historic Properties define 'rehabilitation' as 'the process of returning a property to a state of utility through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural and cultural values.' ... It is simply not possible to renovate the North Beach library to provide an efficient contemporary use. Moreover, renovating it

provide legally required disability access would greatly diminish its character-defining features.”
(Howard Chabner, E-mail, October 9, 2010).

“To renovate the existing building as proposed by others would be a costly undertaking. Seismic and ADA accessibility upgrades would need to be done. All this would be done without any area being added so the library would remain cramped and inadequate. By preserving the building exterior would mean the building would remain unattractive and uninviting from the street. Replacing the building makes better sense and would be more cost effective.” (Ed Choi, E-mail, October 4, 2010)

Response AL-8

The commenters express disagreement with the determination that the existing library building is a historical resource and express support for demolition of the existing library building and implementation of the proposed Master Plan. The comments are noted.

Comment AL-9: The Preservation and Rehabilitation Alternative or Preservation and Expansion Alternative(s) would be more environmentally conscientious.

“With regard to the statement on page 62 – ‘The proposed project would not conflict with the Sustainability Plan’ the HPC believes that while this may be true, the HPC also believes that re-use of the North Beach Library would be more sustainable.” (Charles Chase, Historic Preservation Commission, Letter, October 25, 2010)

“Wouldn’t a renovation and upgrade of the existing building be more environmentally conscientious than this new proposal? Isn’t that what we want as San Franciscans?” (Sarah Kliban, Letter, October 12, 2010)

“There is detailed stuff about the mitigation measures need to be reviewed by my Commission and Planning before the issuance of a permit. While the new library will be LEED-certified, the most sustainable route is always to re-use existing structures instead of to build new ones, so that really wasn’t brought out that, you know, the greenest thing to do is to re-use and retrofit our existing buildings.” (Alan Martinez, Public Hearing Transcript, October 7, 2010)

“Ignores fact that expanding existing library is the most sustainable plan and is half as expensive (with the potential for more interior space) than the Triangle library.” (Sue Cauthen, Coalition for a Better North Beach Library & Playground, E-mail, October 12, 2010)

Response AL-9

The commenters express a general opinion that renovation of the existing library under a preservation alternative would be more sustainable or consume less energy than demolition of the existing library and construction of a new library.

As stated in the DEIR on page 28, the proposed project would be required to adhere to the City and County’s Municipal Green Building Ordinance. Pursuant to this Ordinance, the project would be required to adhere to the San Francisco Environmental Code, which includes provisions for energy use reduction and materials reuse. For example, a minimum of 65 percent of construction and demolition debris must be diverted from the landfill, regardless of whether the proposed

project or a renovation alternative were constructed. As stated in the Initial Study (Appendix A of the DEIR) on pp. 35, the proposed project would have a less-than-significant impact on greenhouse gas emissions. Commenters' opinions regarding sustainability are noted.

Regarding re-use of the existing library building for another use, please see DEIR p. 249, which describes the considered-but-rejected Adaptive Reuse and New Library Building Alternative. As stated there, this alternative was rejected from further consideration because it would not meet most of the basic project objectives. In addition, SFRPD currently does not seek to acquire buildings requiring renovations to meet seismic safety standards.

Regarding the expense of each alternative, please see response to comment AL-12, on page 191, which states that financial cost is not considered under CEQA.

Comment AL-10: Comment questions the “rejection” of the Rehabilitation and Southerly Expansion Alternative.

“Footnote 4 at the bottom of page 15 states that *‘the project would result in a greater amount of net new open space because it would develop a new library in a two-story building, whereas this alternative would construct a single-story addition to the existing library.’* If this is the reason to reject it, why didn’t the DEIR include an alternative with a two-story addition to the existing library?” (Vedica Puri, Letter, October 12, 2010)

Response AL-10

The comment refers to a footnote in the DEIR summary regarding the Preservation and Southerly Expansion Alternative.

The DEIR does not “reject” this alternative. To the contrary, this alternative is fully described and analyzed in Chapter 6 of the DEIR, pp. 217–230. Alternatives rejected from further analysis are described on pp. 241–251 of the DEIR.

As shown in Table 9 on p. 239, the Preservation and Southerly Expansion Alternative would increase open space compared to existing conditions, but it would not do so to the same extent as the proposed project. Any lateral addition to the existing library building would result in the occupation of existing public open space by the footprint of the addition. It is therefore unclear how the commenter expects an addition to result in the same amount of open space as the proposed project. Please also see the Three-Story Library (701 Lombard Parcel) Alternative, which is analyzed on p. 230–237 of the DEIR. This alternative would result in 14,081 square feet of public open space, which is more than the 12,010 square feet of open space that would result under the proposed project.

In all cases, the DEIR found that the proposed project and all alternatives would have less-than-significant impacts to recreation.

Comment AL-11: The EIR should include a three-dimensional rendering of different alternatives across the entire project site, including the playground.

“There is one area where I feel [the EIR] lacks a level of disclosure. I would ask that be provided, and that is a more three-dimensional depiction of the spatial variations on all of the schemes. There is obviously, which is harder to depict, is the level differences on the playgrounds, which currently operates in a very architectural way with little retaining walls, etc., as that is being changed, I would like to see that as a new plane of operation and how it deals with the surrounding weights of the streets – that side is not a level side, so how did you do that? Are you operating on a partially tilted plane? And what does it really mean, even in the alternatives, to look at the massing of the building as it moves through the different schemes? I find the EIR too diagrammatic, it speaks about three-dimensionality, but it doesn’t really show what it really means, and I believe it’s necessary for disclosure when people look at this EIR to understand that really, more visually. I will probably have some other comments, but I will submit them by the time specified here in the Draft EIR.” (*Commissioner Moore, Public Hearing Transcript, October 7, 2010*)

“The aesthetic and visual analysis contained in the DEIR is incomplete in that it does not adequately and accurately show visual representations of the future conditions of the proposed new building, landscaping and park features in their site. Please include the following:

- “(a) 3-D computer modeling to show the massing of the proposed new building and all alternatives, including a northern preservation and expansion alternative. (See comments on Alternatives.)
- “(b) 3-D computer modeling of the entire park showing all changes in surface and grade that *would exist during both the Phase 1 and Phase 2 conditions.*” (*Vedica Puri, Letter, October 12, 2010*)

Response AL-11

The comment requests three-dimensional computer modeling of the entire playground after both Phase 1 and Phase 2 of the proposed project, as well as of all alternatives.

Three-dimensional modeling of the entire playground is not required to determine the aesthetic impacts of the proposed project. As stated in the DEIR on p. 45, the design of Phase 2 of the project is conceptual. It is, however, detailed enough to provide for adequate environmental analysis. Given that no substantial new above-ground structures are proposed for the playground portion of the project site, DEIR **Figures 30, 31, and 32** on pp. 126–128 are appropriate to convey the overall amount of visual change that is anticipated to occur. Please also see **Figure 3** on DEIR p. 33, which shows existing spot elevations. The Project Description, on DEIR page 45, clearly states that the grade will be equalized across the existing playground site.

Nevertheless, to further illustrate massing of each alternative and level differences of the playground and streets, please see **Figures C&R-7 through C&R-9**, on pages C&R-185 through C&R-190, which present photographs of a three-dimensional physical model of the proposed project and of the conceptual massing and spatial relationships of the Preservation and Southerly Expansion Alternative and the Three-Story Alternative, as well as the Preservation and Northerly Expansion Alternative. It is noted that these photographs are from an aerial perspective to better illustrate the massing of each alternative and to depict the different elevations of the playground. As such, they do not represent views commonly available to the public. Additionally, the models



(a) Proposed Project



(b) Rehabilitation and Southerly Expansion Alternative

SOURCE: Leddy Maytum Stacy Architects, 2011

NOTE: Photos illustrate conceptual models of general site contours, building massing, and playground feature locations. Design details, materials, and playground elements are not finalized.

2008.0968E: North Beach Public Library . 206352.01

Figure C&R 7

Massing Model Aerial Photos from the Northwest



(c) Three-Story Alternative



(d) Rehabilitation and Northerly Expansion Alternative

SOURCE: Leddy Maytum Stacy Architects, 2011

NOTE: Photos illustrate conceptual models of general site contours, building massing, and playground feature locations. Design details, materials, and playground elements are not finalized.

2008.0968E: North Beach Public Library . 206352.01

Figure C&R 7 (cont.)

Massing Model Aerial Photos from the Northwest



(a) Proposed Project



(b) Rehabilitation and Southerly Expansion Alternative

SOURCE: Leddy Maytum Stacy Architects, 2011

NOTE: Photos illustrate conceptual models of general site contours, building massing, and playground feature locations. Design details, materials, and playground elements are not finalized.

2008.0968E: North Beach Public Library . 206352.01
Figure C&R 8
 Massing Model Aerial Photos from the South



(c) Three-Story Alternative



(d) Rehabilitation and Northerly Expansion Alternative

SOURCE: Leddy Maytum Stacy Architects, 2011

NOTE: Photos illustrate conceptual models of general site contours, building massing, and playground feature locations. Design details, materials, and playground elements are not finalized.

2008.0968E: North Beach Public Library . 206352.01
Figure C&R 8 (cont.)
 Massing Model Aerial Photos from the South



(a) Proposed Project



(b) Rehabilitation and Southerly Expansion Alternative

SOURCE: Leddy Maytum Stacy Architects, 2011

NOTE: Photos illustrate conceptual models of general site contours, building massing, and playground feature locations. Design details, materials, and playground elements are not finalized.

2008.0968E: North Beach Public Library . 206352.01
Figure C&R 9
 Massing Model Aerial Photos from the East



(c) Three-Story Alternative



(d) Rehabilitation and Northerly Expansion Alternative

SOURCE: Leddy Maytum Stacy Architects, 2011

NOTE: Photos illustrate conceptual models of general site contours, building massing, and playground feature locations. Design details, materials, and playground elements are not finalized.

2008.0968E: North Beach Public Library . 206352.01
Figure C&R 9 (cont.)
 Massing Model Aerial Photos from the East

show Mason Street in an “open” condition to better draw attention to the built relationships of the library with other on-site features. Finally, the landscaping illustrated in the physical models is illustrative.

Comment AL-12: The cost of each alternative should be discussed in the EIR.

“The DEIR is inadequate, inaccurate, incomplete and biased in not properly analyzing the programmatic and economic feasibility of the alternatives before rejecting them. We request matrix clearly delineating the costs and benefits of the alternatives be included in the Comments and Responses document so the public can fully understand the EIR’s conclusions.” (*Vincent Marsh, San Francisco Preservation Consortium, E-mail, October 12, 2010*)

“There is no justification for the demolition of a building eligible for both the California and National Historic Registers according to your department’s own studies because the current Library can be adapted, retro-fitted, expanded, and returned to ADA accessibility. Although the planners have been evasive in revealing actual costs, and nowhere in the DEIR is a cost comparison shown between adaptive re-use versus demolition and the Master Plan, it appears that restoration such as the Library has done so successfully with the Marina and Eureka Valley libraries can be accomplished for approximately half the cost.” (*Joan Wood, October 12, 2010*)

Response AL-12

The comment refers to cost comparisons among the proposed project and alternatives.

Pursuant to CEQA Guidelines Section 15313, “economic or social effects of a project shall not be treated as significant effects on the environment. ... The focus of the analysis should be on the physical changes.”

Therefore, the alternatives environmental analysis does not include a cost comparison. Instead, it focuses on physical environmental effects.

Decision-makers may consider relative cost, as well as other factors not discussed in the EIR, when determining project approval. Similarly, the purpose of CEQA is not to provide “justification” for proposed projects—it is to analyze their potential physical environmental impacts.

Comment AL-13: The alternatives analysis does not discuss greenhouse gases.

“The DEIR Fails to Include an Analysis of Greenhouse Gases Related to the Proposed Project and Alternatives.

“The DEIR contains no discussion or analysis of the greenhouse gasses that would be emitted to implement the proposed project, which would include the amount of energy required to manufacture, transport and construct a completely new building and to demolish the existing library, as well as the implementation of the Master Plan for relocating all of the outdoor recreation spaces, which would include the excavation and removal of between 1,000 and 1,375 cubic yards of soil, construction of three new tennis courts and new bocce courts, the removal of the existing trees, and the installation of all new

landscaping. Compare greenhouse emissions from the proposed project to the preservation alternatives, assuming renovation would be undertaken to meet all energy efficient guidelines.” (*Vedica Puri, Letter, October 12, 2010*)

“In addition, the Greenhouse Gas (GHG) analysis inadequately concluded the effects of the preservation alternatives and the proposed Project would have similar less than significant impacts. The GHG analysis should take into account the benefits of preservation over new construction for all reasonably foreseeable future projects in the City in order to properly evaluate the cumulative impacts on air quality of choosing preservation alternatives whenever possible.” (*Vincent Marsh, San Francisco Preservation Consortium, E-mail, October 12, 2010*)

Response AL-13

The comments refer to greenhouse gases that would be emitted by the proposed project and alternatives.

An analysis of greenhouse gas emissions of the proposed project, including a quantified emissions estimate, is provided in the Initial Study (Appendix A of the DEIR) on p. 37–47. As stated there, the proposed project would have a less-than-significant impact on greenhouse gas emissions.

Regarding the greenhouse gas emissions of Alternatives explored in the DEIR, as stated in response to comment PD-1, on page 35, the Bay Area Air Quality Management District has determined that the City and County of San Francisco has prepared a Qualified Greenhouse Gas Reduction Strategy. As stated in the response to Comment AQ-2, on page 141, the proposed project would be generally consistent with the City’s GHG reduction strategy and, as a result, there is no requirement to quantify potential GHG emissions provided that the proposed project, or its alternatives, do not conflict with the plan, and GHG impacts would be less than significant. In addition, the proposed project would be consistent with the Climate Action Plan, as detailed on DEIR pp. 63. Each alternative’s consistency with applicable plans and policies is discussed in Chapter 6 of the DEIR. Please also see response to comment AL-9, on page 182.

Comment AL-14: The alternatives analysis should define and consistently use terms related to usable / assignable space within the library.

“The DEIR says this alternative would add 5,290 sq feet of ‘usable library space’ plus 4,330 of ‘service space’ for a total of 9,620 sq ft as opposed to the proposed new library, which would have only 8,500 sq ft. These terms are not defined.

- “(a) Please define the terms ‘usable library space’ and ‘service space.’
- “(b) How many sq feet of ‘usable library space’ vs. ‘service space’ would there be in the new library?
- “(c) Please define the terms ‘assignable space’ and ‘non-assignable spaces’
- “(d) How many sq feet of ‘assignable space’ vs. ‘non-assignable space’ would there be in the new library?

“(e) What is the design standard for ‘assignable space’ vs. ‘non-assignable space’ (or ‘usable library space’ vs. ‘service space’) in a library building according to current Library Design Standards?”

“Please use the same terms consistently throughout when describing and comparing the proposed new library to each alternative library design.” (*Vedica Puri, Letter, October 12, 2010*)

Response AL-14

Regarding assignable/usable space, please see response to comment PD-3, on page 42. As stated there, assignable space in the library is space dedicated to public use and include the collection, seating, computers, meeting/program rooms, copy area, and the like, as well as staff support spaces such as the staff break room, work room for materials processing, back of house work areas, and staff restrooms. The proposed project would have about 36 percent non-assignable space, and typically libraries are designed to have non-assignable space compose between 20 percent and 35 percent of total floor area per LibrisDesign, which is a planning tool for California libraries.

As stated on pp. 207 and 208 of the DEIR, an EIR need not describe or evaluate the environmental effects of alternatives in the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project (CEQA Guidelines Section 15126.6(d)). The percentage of assignable space in each alternative is not relevant to the avoidance of the project’s significant impacts to historic resources. Also, the percentage of assignable space in any design option was not used by the EIR preparers as a reason for rejection of alternatives from further consideration. However, the relative differences in assignable space between alternatives are useful in comparing alternatives to the proposed project in terms of each alternative’s merits.

Please see the response to Comment PD-3, p. C&R-44, which describes edits to the EIR to clarify the term, and use of the term, “assignable space”; these edits are also recapitulated in Section D of this document.

Comment AL-15: The EIR should include an alternative that minimizes construction time.

“As to Project Objective 5, above, to ‘minimize disruption to the community, the library and park operations,’ the DEIR discloses that construction of the proposed park renovations under the Master Plan would require closure of the entire outdoor portion of the park operations for a period of at least 10 months once funding becomes available (pg 49). Prior to funding availability, during an unknown period of time described in the DEIR as the “‘Phase 1’” or the “‘Interim’” period, the community would be disrupted by yet-to-be determined temporary facilities on the graded site of the demolished library and in the Mason Street right of way. Please consider alternatives that would avoid these major disruptions to the community and park operations.” (*Vedica Puri, Letter, October 12, 2010*)

Response AL-15

The commenter requests an alternative that would reduce potential delays. The comment is noted.

Impacts related to construction duration (noise, air quality, transportation, and recreation) were determined to be less than significant. Therefore, exploration of an alternative with a reduced construction duration is not required under CEQA.

Please note that one of the project sponsor objectives is to “minimize or avoid disruptions to library service while the proposed library is under construction,” as stated on DEIR p. 29. The proposed project would keep the library open during construction, and the library would only close during the moving period. In comparison, the Preservation and Rehabilitation Alternative would require partial or complete interruption of library services during construction, as stated on page 213.

Comment AL-16: The EIR should include an alternative that is “code-compliant.”

“For any other project, a substantive code-compliant design is preferable to a non-code compliant proposal. North Beach Library’s preservation/expansion is a code-complying design, while the proposed triangular library is non-code compliant—requiring rezoning, spot zoning and construction 19’-6” into the Mason Street right-of-way.” (*Howard Wong, Letter, October 12, 2010*)

Response AL-16

The comment advocating for a “code-compliant” alternative is noted.

Whether a project is in full compliance with the Planning Code is not necessarily related to a project’s physical environmental effects, as evaluated under CEQA. In the case of the proposed project, the only significant, unavoidable impacts identified are those related to demolition of a historical resource—the existing North Beach Library building, and there is no relationship between this proposed demolition and the proposed project’s code compliance. While rezoning of the project site to a P (Public) Use District is necessary to permit approval of the project as a use larger than 3,999 square feet, an inconsistency with the zoning in and of itself does not result in a physical change. The EIR identifies no significant effects related to land use. Accordingly, no separate “code-compliant” alternative is required under CEQA.

Likewise, the EIR identifies no significant effect with respect to the fact that the proposed project would extend into the Mason Street right-of-way. Moreover, as stated in the Draft EIR on page 207, “all of the alternatives discussed below could be constructed with Mason Street vacated, Mason Street narrowed (as in the Mason Street Narrowing Variant), or Mason Street open as under existing conditions.” Additionally, the EIR therefore includes alternatives that would not involve encroachment into the existing Mason Street right-of-way, including the Three-Story Library (701 Lombard Parcel) Alternative. It is also noted that neither the Preservation and Rehabilitation Alternative nor the Preservation and Southerly Expansion Alternative would extend into the Mason Street right-of-way. Moreover, the EIR (pp. 250 – 251) discussed off-site alternatives that were explored but ultimately rejected from consideration as infeasible.

Comment AL-17: Consider selling the building to someone who would move it.

“I would like to add as a foot note that the old library could be sold as is (for \$0.00 and the requirement to remove it as soon as it is available) ... this happens occasionally to older buildings that have some merit (ex: this one could be a winery or a large house somewhere). This would perhaps save the City some money and make someone happy.” (*Elizabeth Diaz, E-mail, October 6, 2010*)

Response AL-17

The comment advocating for sale and relocation of the existing library building is noted. This alternative was not considered in the EIR, as it would not necessarily avoid the significant impacts to historic resources, because relocation of a historical resource inevitably has an adverse impact on at least the resource’s integrity of location and setting (two of the seven aspects of integrity); moreover, it is not clear, given the building’s structural deficiencies, that it could be relocated without sustaining damage. As further explained in response to comment AL-1, on page 153, the EIR need only set forth “those alternatives necessary to permit informed public participation and reasoned choice by decision-making body” (CEQA Guidelines 15126.6(f)).

Mitigation Measures

Comment MM-1: The EIR does not adequately discuss mitigation measures included in the Initial Study and how they would mitigate project impacts.

“Several Mitigation Measures are included in Chapter 7, which, according to the DEIR, ‘are necessary to reduce or avoid potential significant effects of the proposed project,’ including potential adverse affects to Archeological Resources, Breeding Birds, Soil Contamination by Petroleum Hydrocarbons or Metals, and Underground Storage Tanks. Although reference is made to the initial study, the DEIR itself does not include an adequate description of the significance of the potential impact and how the proposed Mitigation Measures will mitigate the impact to less than significant.

“One example is that the Mitigation Measure for Breeding Birds does not even discuss the fact that the nesting habitat (virtually all of the trees on the project site) will be removed permanently. There is not any analysis of what birds are present on the site. Further, the mitigation measure only addresses “active construction work” not removal of the many trees.

“Another example is the lack any information as to the potential for affecting significant archeological resources—only a footnote reference to a report by Randal Dean and Don Lewis of the Planning Department. The DEIR must be revised to include a summary of the findings in the referenced report so the decision-makers can understand why and how the impacts could be significant without going to the Planning Department to review a report.” (*Vedica Puri, Letter, October 12, 2010*)

Response MM-1

The comment refers to the mitigation measures in the Initial Study (Appendix A of the DEIR) and states that the DEIR does not include an adequate discussion of how these measures would mitigate impacts to less-than-significant levels.

The Initial Study on p. 64 includes a discussion of the proposed project's impacts to nesting birds. As stated there, none of the existing trees or other vegetation on the project site provide substantial habitat for rare or endangered species, based on the area's highly developed quality and a qualified biologist's site visit and knowledge of local species. No nests were observed at the time of the tree survey, but implementation of Mitigation Measure M-BI-1, which defines steps for avoiding effects to nesting birds, would reduce potential impacts to less-than-significant levels. Nesting habitat would not be considered to be removed permanently, given that the replacement trees on the project site would be mature within approximately 20 years and would provide habitat during the term leading to maturity.

Regarding archaeological resources, potential impacts are analyzed in both the Initial Study (accidental discovery of human remains on Initial Study p. 28) and the DEIR (accidental discovery of archeological deposits on DEIR pp. 134 and 151. As stated in both sections, Mitigation Measure M-CP-1 would reduce impacts to less-than-significant levels. The DEIR already includes a summary of the memorandum prepared by the Planning Department, as referenced in the footnote on pp. 134 and 151. It is therefore unclear what additional summary the commenter is requesting. As stated in these footnotes, the document is available for public review at the Planning Department.

Pursuant to CEQA Guidelines Section 15063(a)(3), an Initial Study is not required to include the level of detail included in an EIR.

Comment MM-2: The EIR does not adequately analyze hazards related to soil contamination and other hazardous materials.

"The DEIR should also discuss in some detail the potential for soil contamination of between 1,000 and 1,375 cubic yards of subsurface soils proposed for removal from the site of the children's play area, as well as the potential for encountering underground storage tanks during the excavation of the 701 Lombard parcel, the site of a former gas station." (*Vedica Puri, Letter, October 12, 2010*)

Response MM-2

The comment refers to the potential impacts of hazardous materials associated with excavation of the children's play area.

Potential hazardous materials impacts associated with excavation are discussed in the Initial Study (DEIR Appendix A) on pp. 70–76. Mitigation Measure M-HZ-1, detailed on pp. 84 – 86, would mitigate impacts of contaminated soils to less-than-significant levels. Mitigation Measure M-HZ-2, which is provided on p. 86, would mitigate impacts associated with removal of underground storage tanks, if encountered.

Comment MM-3: Request for explanation of how mitigation measures are enforced.

"The DEIR contains the statement that '*the mitigation measures have been adopted by the project sponsor.*' How will they be enforceable and who is responsible for enforcing them?" (*Vedica Puri, Letter, October 12, 2010*)

Response MM-3

The comment refers to enforcement of mitigation measures. A Mitigation Monitoring and Reporting Program (MMRP) will be included in the project approvals. This document states the responsible party, schedule, and the agency responsible for monitoring and reporting responsibility for each mitigation measure. Project sponsors are also required to sign an “Agreement to Implement Mitigation Measures.”

Comment MM-4: Historic Preservation Commission should review historic documentation should be required as mitigation.

“With regards to Mitigation Measures M-CP-2a, the HPC recommends that the HABS Level II documentation be reviewed and approved by the HPC and/or the Preservation Technical Specialist of the Planning Department.

“With regards to Mitigation Measures M-CP-2b, the HPC recommends that the Interpretive Program be coordinated and written by a historian meeting the professional qualifications of the Secretary of the Interior’s Standards and that the program include information about all of the Appleton and Wolfard libraries. The content of the Interpretive Program should be reviewed and approved by the HPC and/or the Preservation Technical Specialist of the Planning Department.” (*Charles Chase, Historic Preservation Commission, Letter, October 15, 2010*)

Response MM-4

The comment requests that the HABS Level II documentation called for in Mitigation Measure M-CP-2a, as well as the content of the Interpretive Program identified in Mitigation Measure M-CP-2b, be reviewed by the Historic Preservation Commission or the Planning Department.

As noted in the Draft EIR on p. 156, the Documentation report will be reviewed by the Planning Department and HPC prior to issuance of any required permit(s).

The comment also states that the Interpretive Program should be coordinated and written by an architectural historian meeting the professional qualifications of the Secretary of Interior’s Standards. It also states that the program should include information on all of the Appleton and Wolfard libraries. The comment is noted.

D. Draft EIR Revisions

Changes in Response to Comments

The following changes to the text of the Draft EIR are made in response to comments on the Draft EIR or are included to clarify the Draft EIR text. In each change, new language is double underlined, while deleted text is shown in ~~strike through~~, except where the text is indicated as entirely new, in which case no underlining is used for easier reading. (Revised figures do not show changes to the text in the figures.)

Summary

On page 14, the last sentence of the last full paragraph is edited as follows to clarify assignable/non-assignable library spaces:

Alternately, if the elevator tower is placed within the existing library's interior, this alternative would result in a net decrease in programmable library square footage by about 220 square feet and would result in less overall library ~~service~~ assignable space at the North Beach Branch than what currently exists and less than most other branch library facilities.

On page 15, the last sentence of the second full paragraph is edited as follows to clarify assignable/non-assignable library spaces:

This alternative would yield approximately 5,290 square feet of ~~usable~~ assignable library space, plus 4,330 square feet of ~~service~~ non-assignable space, including existing spaces, though its multiple-level layout and L-shaped design would reduce operational efficiency and require additional library staff.

Project Description

On page 26, the second-to-last sentence of the last full paragraph is edited as follows to clarify assignable/non-assignable library spaces:

Providing staff on multiple floors generates staff costs and results in less ~~usable~~ assignable library space, with more space devoted to stairs, elevators, and duplicated functions.

On page 33, Figure 3 is revised to clarify the elevation difference between the children's play area and Greenwich Street. Please see the revised Figure 3 on the following page.

On page 34, the paragraph at the top of the page is revised as follows to accurately describe use controls of the North Beach Neighborhood Commercial District (NCD):

The North Beach NCD allows a variety of ~~neighborhood-serving~~ uses, ~~typically less than~~ 4,000 square feet ~~or less~~ in floor area. A use size up to 1,999 square feet is permitted, a use size between 2,000 and 3,999 square feet requires a Conditional Use Permit. Uses above 3,999 square feet are not permitted. The 40-X Height and Bulk District allows buildings up to 40 feet tall, with

no bulk requirements. For a detailed discussion of existing zoning districts, see Chapter 3, Plans and Policies.

On page 34, the end of the first full paragraph is revised as follows to clarify the elevation difference among existing park features and Greenwich Street:

The dimensions of these facilities are discussed in Section 4.A. Land Use and Recreation. The hardscape area and tennis courts are level with Lombard Street, and the northern entrance to the playground is located along Lombard Street. The southern entrance to the playground is located at Greenwich Street, 11 feet above the multipurpose hardscape area, and the children's play area is 3 feet below level with Greenwich Street but 8 feet above the multipurpose hardscape area; the difference in grade between the two levels is approximately 11 feet.

On page 34, the last sentence of the last paragraph is revised as follows to clarify assignable/non-assignable library spaces:

The building contains approximately 3,050 square feet of assignable space (2,520 sf of reading room space and 530 sf of staff working space) and; 2,280 sf of circulation, service, and mechanical non-assignable space; and 530 sf of staff working space. The branch library was designed by Appleton & Wolfard Architects in the 1950s and was constructed between 1958 and 1959 on a then-existing playground.

On page 40, the sixth sentence of the first paragraph is revised, and a new seventh sentence added, as follows to clarify assignable/non-assignable library spaces:

The second floor would contain assignable spaces, such as a community / program room, restrooms, service and mechanical spaces, a staff lounge, and circulation space. It would also contain non-assignable spaces, such as mechanical space and circulation space.

On page 40, the second sentence of the third paragraph is revised as follows to clarify assignable/non-assignable library spaces:

Neither operating hours nor ~~usable~~ assignable space within the existing library would be affected by construction.

On page 42, Table 2 is revised, as shown on the following page, to correctly state that the existing library is 18 feet tall as measured from Mason Street, as well as to clarify assignable and non-assignable spaces within the library.

On page 45, the fourth sentence of the first full paragraph is revised as follows to accurately state the volume of soils to be removed through excavation of the children's play area:

During this phase, the existing children's play area in the southwestern portion of the block would be removed, and the approximately 9,900 square feet of area would be excavated to an average depth of 8 feet, resulting in approximately 3,000 ~~4,000~~ cubic yards of subsurface soils removal.

**TABLE 2 (REVISED)
PROJECT CHARACTERISTICS**

| | EXISTING CONDITIONS | | | PROPOSED PROJECT CONDITIONS ^a | | | NET CHANGE | | |
|---|-------------------------------|--------------------------|-----------------|--|---------------------------|----------|---------------------|------------------|----------|
| | Square Feet | Linear Feet | Quantity | Square Feet ^b | Linear Feet | Quantity | Square Feet | Linear Feet | Quantity |
| Building Area | | | | | | | | | |
| Footprint | 4,400 | | | 6,180 | | | 1,780 | | |
| Height ^c | | 25-18-28.5 | | | 24-30 | | | 5-6-12 | |
| Children Area | 500 | | | 950 | | | 450 | | |
| Teen Area | 170 | | | 435 | | | 265 | | |
| Adult Area | 1,850 | | | 1,910 | | | 60 | | |
| Program Room | 0 | | | 660 | | | 660 | | |
| Staff Work Area | 335 | | | 635 | | | 300 | | |
| Staff Lounge | 195 | | | 165 | | | -30 | | |
| Copy / Self Check | | | | 150 | | | 150 | | |
| Waiting & Gallery | | | | 510 | | | 510 | | |
| Building Support Spaces Non-Assignable Spaces ^d | 2,280 | | | 3,745 3,085 | | | 4,465 805 | | |
| Total Floor Area | 5,330 | | | 8,500 | | | 3,170 | | |
| Shelving | | 2,231 | | | 2,565 | | | 234 | |
| Computers | | | 5 | | | 19 | | | 14 |
| Seats | | | 42 | | | 58 | | | 16 |
| Outdoor Area | | | | | | | | | |
| Joe DiMaggio Playground | 92,031 ^e 97,700 | | | 104,051 ^e 109,740 | | | 12,020 | | |
| Mason Street Right-of-Way | 9,681 | | | 7,620 ^{e,f} | | | -2,061 ^e | | |
| Mason St. Sidewalk Width | | East: ±13.5 West: ±16 | | | East: ±13.5 West: ±8.8 | | | N/A ^g | |
| 701 Lombard Street Parking | 4,119 | | | 0 | | | -4,119 | | |
| Parking Spaces On-Street | | | 10 | | | 7 | | | -3 |
| Parking Spaces Off-Street | | | 20 ^g | | | 0 | | | -20 |

^a All square footage changes would occur in Phase 1 of the proposed project; Phase 2 would reconfigure the facilities within Joe DiMaggio Playground but not alter the size of the overall park property or of any buildings.

^b The square feet of each program area within the library may be slightly adjusted as the design is developed, but the overall building area would remain the same.

^c The height of existing library is measured at the midpoint of the building on Mason Street. The height of its chimney is +/-21.5 feet measured from Mason St and +/-28.5' measured from the tennis courts. The height of the proposed library ranges between +/- 24 feet and 27.5 feet at the eave line measured at its three corners. The height measured to the top of its skylight monitor is +/-30 feet.

^d Part 1, Title 24, Chapter 16, Article 5.2:q of the California Administrative Code defines non-assignable space for libraries as: "utility areas of a building required for the function of the building, including stairways; elevators; corridors and interior walkways; public lobbies; restrooms; duct shafts; mechanical rooms; electrical closets; telecommunications closets for voice, data, electrical, security and fire systems; janitor's closets; fireplaces; interior and exterior wall thickness; and exterior amenities that are part of the building but not enclosed, such as loading docks and covered patios, porches, and walkways.

^e Joe DiMaggio Playground defined as Assessor's Block 075 (109,681 sf per Assessor's website) – [existing library footprint (4,400 sf) + pool/clubhouse footprint (13,250 sf)] = 92,031 sf (existing). 2,061 sf of the existing Mason Street Right-of-Way would be occupied by the new library. Therefore, 97,700 92,031 sf existing playground, + 4,400 sf existing library footprint removed, + 7,620 sf of remaining Mason Street Right-of-Way = 109,740 104,051 sf.

^f Mason Street is 69.5 feet from property line to property line. The western sidewalk is 16 feet wide, of which approximately 4 feet is used for parking by the 701 Lombard Street lot. The eastern sidewalk is 13.5 feet wide, and the curb-to-curb width is 40 feet. The proposed library would extend 19.5 feet into the existing right-of-way. As part of the project, entire width of remaining Mason Street right-of-way would be open space, some of which could function as a pedestrian circulation area.

^g Includes 8 existing car-share spaces and one handicapped-accessible space not specifically dedicated to park or library use.

SOURCE: Leddy Maytum Stacy Architects, *North Beach Library Area and Program Count Comparison*, February 2010. Existing conditions are based on original 1957 documents and North Beach Branch Collections provided by SFPL. Proposed project measurements are based on 50 percent design development drawings dated September 2009 and updated April 2010.

On page 49, the second sentence of the first full paragraph is revised as follows to accurately state the volume of soils to be removed through excavation of the children's play area:

Depending on funding for Phase 2 of the project, the construction period of Phase 2 would last approximately 10 months, beginning with the closure of the existing tennis courts, multi-purpose hardscape area, and children's play area, excavation of approximately 3,000 ~~4,000~~ cubic yards of soil to an average depth of 8 feet in early 2013, a 10-month construction period, and ending by 2014.

Land Use and Recreation

On page 76, the second sentence of the third full paragraph is revised as follows to clarify the elevation difference among existing park features and Greenwich Street:

For example, the hardscape area and tennis courts are at an elevation of 25.5 feet above mean sea level (asl), which is ~~44~~8 feet lower and on a separate level from the children's play area.

Aesthetics

On page 99, the seventh sentence of the first full paragraph is revised as follows to accurately describe the height of the existing library on the Mason Street side:

Also, the red brick of the existing ~~25.5~~18-foot library building contrasts with the surrounding beige and pastel buildings.

On page 100, the first sentence of the second full paragraph is revised as follows to describe the architecture and building colors in the Washington Square area of North Beach:

Within this area, neighborhood character is forged by the built environment, which contains one-to-four-story buildings (with two-to-three stories most prevalent), generally from the Edwardian era, that exhibit ~~Victorian and Edwardian architecture~~ Classical Revival detailing, with bay windows on the second and third stories, ~~brightly painted~~ pastel-colored siding with contrasting trim lines, and decorative cornices at the skyline.

On page 118, the bottom image in Figure 27 is replaced to accurately convey the type and character of landscaping that could be included within the Mason Street right-of-way under the proposed project. Please see Revised Figure 27 on the following page.

On page 103, Figure 13 is revised (as shown on p. C&R-204) to include the route of the 49-mile scenic drive.

On page 129, the first sentence of the first full paragraph is revised as follows to accurately describe the height of the existing library:

The proposed library, at 2 stories, ranges between + / - 24 feet and 27.5 feet at the eave line. The existing library ranges from 18 feet at Mason Street to 25 feet at the east side measured from the tennis courts. ~~and approximately 30 feet in height, would be 4 feet taller than the existing library.~~



Existing Conditions

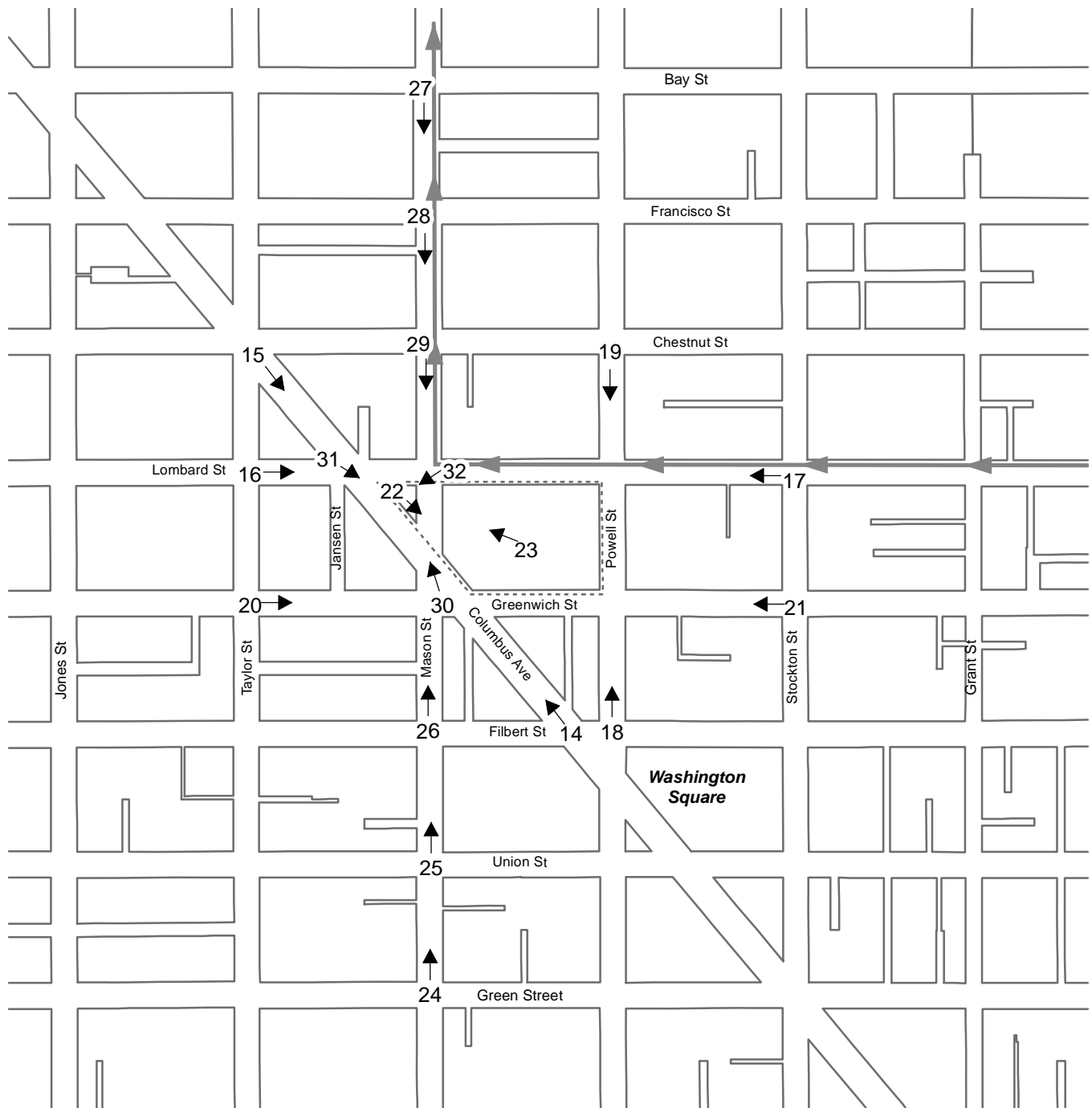


View with Proposed Library and Illustrative Open Space Treatments

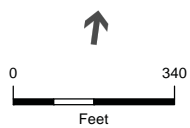
SOURCE: Leddy Maytum Stacy Architects, 2010

2008.0968E: North Beach Public Library . 206352.01

Figure 27 (Revised)
Looking Southward on Mason Street from Bay Street



22 Figure Number



→ Direction of View

Project Site

→ 49-Mile Scenic Drive Route

SOURCE: ESA, 2010

2008.0968E: North Beach Public Library . 206352.01

Figure 13 Revised
View Map

Cultural Resources

On page 149, the first paragraph is revised as follows to accurately state the Historic Preservation Commission's consideration of the Merced and Parkside Branch Libraries:

Separate from the environmental review process being undertaken for the proposed project, on October 7, 2009, the San Francisco Historic Preservation Commission (HPC) initiated designation of landmarks of the Marina, Eureka Valley / Harvey Milk Memorial, North Beach, Western Addition, and Excelsior Branch Libraries. The HPC postponed consideration of the Merced and Parkside Branches until renovations are completed, Fall 2010. In the HPC's October 25, 2010, comments submitted on the Joe DiMaggio Playground and North Beach Library Master Plan Project Draft EIR, the commission stated that it does not consider the Merced Branch to have a high degree of integrity given the scope and extent of ongoing renovations. In that same comment letter, HPC stated that the addition to the Parkside Branch is compatible with the historic structure.

On page 151, the second sentence of the last full paragraph is revised as follows to accurately calculate the volume of soils to be removed through excavation of the children's play area:

Similarly, during Phase 2 of the proposed project, the existing children's play area would be excavated to an average depth of 8 feet and result in removal of approximately ~~4,000~~ 3,000 cubic yards of material.

Transportation

On page 174, the footnote 107 is revised as follows to delete reference to the NCD use district in light of the fact that the project would require a rezoning to a P District:

Planning Code Section 234.1 states that P Districts do not have parking requirements for libraries. ~~Because the library site is being re-zoned from the North Beach Neighborhood Commercial District (NCD), the parking requirements of that nearby district were examined. For the North Beach NCD, pursuant to Planning Code Section 722.22, institutional uses are not required to provide parking if the "occupied floor area" is less than 5,000 square feet. Although the new library will be 8,500 square feet, the library and architect have determined that 3,750 square feet of the new building would be unassignable floor area, and therefore the "occupied floor area," as defined in Planning Code Section 102.10, would be less than 5,000 square feet. Therefore, no off-street vehicular parking would be required by the North Beach NCD, should the Planning Commission approve the project with Conditional use authorization and not rezone the 701 Lombard Street project site.~~

Shadow

On page 178, the first and third sentences of the second paragraph is revised as follows to clarify the elevation difference among existing park features and Greenwich Street:

The topography of the project site and vicinity slopes downward from ~~39~~ 36.5 feet above sea level (asl) in the south (at Greenwich Street) to 18 feet above sea level (asl) in the northwest (at Lombard Street and Columbus Avenue). Due to this grade, elements of the Joe DiMaggio Playground are at different elevations. The existing children's play area is at ~~36.5~~ 33.5 feet asl, and the tennis courts and multipurpose hardscape area are at 25.5 feet asl.

Alternatives

On page 210, the last sentence of the second full paragraph is revised as follows to clarify assignable / non-assignable spaces:

If it is renovated, portions of the ~~usable~~ assignable space could be temporary closed or permanently altered so as to become non-assignable.

On page 213, the third sentence of the third full paragraph is revised as follows to clarify assignable / non-assignable spaces:

It would not expand the library (it would result in a reduction of ~~usable~~ assignable floor area between approximately 4 percent and 10 percent), and therefore would not meet objectives to increase collection size, programmable space, or to provide a program room.

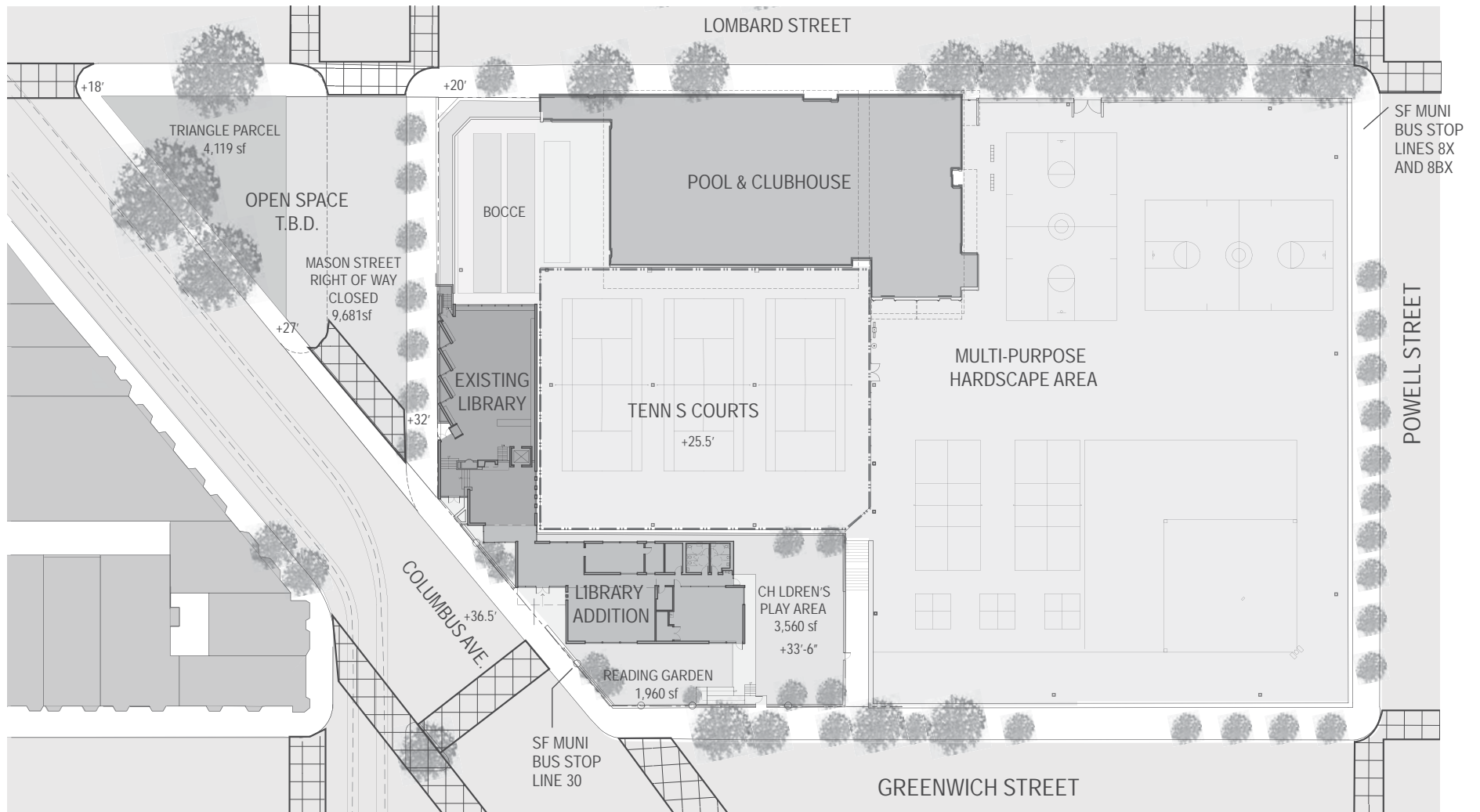
On page 218, Figure 47 is revised to accurately state that the elevation of the children's play area under this alternative would be 33.5 feet, as it is under existing conditions. Please see the following page for Revised Figure 47.

On page 234, the second paragraph is revised as follows to accurately state the height of the existing library in relation to the height of the library under the Three-Story Library Alternative:

In terms of land use, this alternative would convert the existing commercial surface parking lot on the parcel to a library (public) use. It would, like the project, result in the elimination of up to 20 parking spaces currently on the site once the library is constructed. The library would be 40 feet tall, which would be ~~40 feet~~ about 12 feet taller than the proposed project and ~~44 feet~~ about 22 feet taller than the Mason Street façade of the existing branch building at 2000 Mason Street. This alternative, similar to the branch proposed in the Master Plan, would comply with the parcel's existing height limit of 40-X. Like the proposed project this alternative would not physically divide an existing community, conflict with land use plans or policies, or disrupt or divide the neighborhood.

On page 235, the second full paragraph is revised as follows to accurately state the height of the existing library in relation to the height of the library under the Three-Story Library Alternative:

Wind effects associated with this alternative would be similar to the proposed Master Plan. While this alternative would be about ~~40~~ 22 feet taller than the existing library and taller than surrounding buildings, this height is not tall enough to create substantial increases in ground-level wind effects or to cause hazardous wind impacts. Similar to the proposed Master Plan, wind effects would be less than significant.



+18' Spot Elevation



SOURCE: Leddy Maytum Stacy Architects

2008.0968E North Beach Public Library . 206352 01

Figure 47 Revised
Preservation & Southerly Expansion Alternative - Site Plan

On page 237, the last full paragraph is revised as follows in response to commenters' request for clarification regarding assignable / non-assignable spaces:

The Preservation and Rehabilitation Alternative would avoid the proposed project's significant and unavoidable impact to historic architectural resources. This alternative would also result in a stabilized library building that meets SHBC requirements for seismic safety. However, a consequence of implementing this alternative would be displacement of the site's existing westernmost tennis court and / or less ~~usable~~ assignable library space. Programmatic challenges of the existing library would persist. This alternative would not meet most objectives of the proposed project.

Staff-Initiated Changes

The following changes to the text of the Draft EIR are made to reflect minor errors in the Draft EIR, or changes in conditions since publication of the Draft EIR. In each change, new language is double underlined, while deleted text is shown in ~~strike through~~, except where the text is indicated as entirely new, in which case no underlining is used for easier reading.

Summary

On pages 3 and 4, the Project Approvals are modified as follows to correctly reflect that the proposed project would require a rezoning to a P District; delete reference to Historic Preservation Commission approvals in light of the existing library not having been designated a landmark; acknowledge that the Recreation and Park Commission must adopt environmental findings but that the Arts Commission does not do so; and add that the Board of Supervisors would have to approve interdepartmental transfer(s) of property:

Planning Commission

- EIR certification and adoption of Environmental Findings.
- Issuance of Recommendation for Rezoning of Assessor's Block 74, Lot 1 from North Beach NCD to P (Public) Use District.
- ~~Conditional Use authorization for a library (public use) in the North Beach Neighborhood Commercial District (Planning Code Section 723.83), to allow the library use in the event that rezoning to P (Public) Use District is not approved.~~
- Adoption of *General Plan* Priority Policy conformity findings concerning vacation of Mason Street and incorporation of the street into Block 74, Lot 1 and/or Block 75, Lot 1.
- Adoption of *General Plan* and Priority Policy conformity findings.

~~Historic Preservation Commission~~

- ~~Issuance of a Certificate of Appropriateness (if existing branch building is designated as a City landmark).~~
- ~~Adoption of Environmental Findings (if Certificate of Appropriateness required)~~

Library Commission

- Adoption of Environmental Findings.

- Approval of construction of new branch library and demolition of existing library.

Recreation and Park Commission

- Adoption of Environmental Findings.
- Approval of Joe DiMaggio Playground Master Plan, including removal of existing branch library building, construction of new library at 701 Lombard Street, and renovation of outdoor areas within Joe DiMaggio Playground and on portions of the vacated area of Mason Street.

Arts Commission

- ~~Adoption of Environmental Findings.~~
- Resolution of approval for the design of the proposed branch library.

Board of Supervisors

- Adoption of Environmental Findings.
- Approval to fully or partially vacate Mason Street, including reservation of rights for existing utilities.
- Approve interdepartmental property transfer to SFRPD.
- Approval of Rezoning of Assessor's Block 74, Lot 1 from North Beach NCD to P (Public) Use District.

On page 5, the Areas of Controversy to Be Resolved are modified as follows to indicate that the existing building was denied landmark designation:

On the basis of public comments on the Notice of Preparation of an Environmental Impact Report (NOP), potential areas of controversy and unresolved issues for this project include the demolition of the existing North Beach Branch library, which is a historic architectural resource ~~that may be landmarked for the purposes of CEQA~~; effects related to the proposed closure of a portion of Mason Street to vehicular traffic; the aesthetic impacts of the proposed new library including obstruction of views; General Plan consistency; and alternatives to the proposed project. These issues are discussed in this EIR.

Project Description

On page 28, the end of the second paragraph is revised to reflect the outcome of the landmark initiation proceedings:

... Finally, the North Beach Library was the subject of landmark initiation proceedings before the San Francisco Historic Preservation Commission in August and September of 2009 as well as May, June, and July 2010. As further discussed on page 150, the building was denied landmark designation in November 2010.

On page 35, the hours of the pool are clubhouse have been edited to reflect changes to operational hours since publication of the Draft EIR:

~~As of August 2010, the pool is open on the following schedule:~~

| | | |
|-----------|------------|-----------|
| Monday | 6:15 a.m. | 2:30 p.m. |
| Tuesday | 6:15 a.m. | 6:50 p.m. |
| Wednesday | 9:50 a.m. | 5:30 p.m. |
| Thursday | 6:15 a.m. | 6:50 p.m. |
| Friday | 10:00 a.m. | 7:00 p.m. |
| Saturday | 8:15 a.m. | 4:30 p.m. |
| Sunday | 10:00 a.m. | 3:00 p.m. |

~~As of August 2010, the clubhouse is open from 2:30 p.m. to 6:30 p.m. Monday through Friday, when it is used primarily for recreational purposes during the after-school hours. The space also can be programmed, although it is usually set up for table tennis. It is closed to recreational activities on Sundays. The space is also rentable in the evenings by permit for a fee. No existing usage counts of the clubhouse are available.~~

The pool's current hours are currently listed on SFRPD's website:

| | | | |
|-----------|------------|---|-----------|
| Tuesday | 10:00 a.m. | – | 7:00 p.m. |
| Wednesday | 6:30 a.m. | – | 5:30 p.m. |
| Thursday | 10:00 a.m. | – | 7:00 p.m. |
| Friday | 6:30 a.m. | – | 7:15 p.m. |
| Saturday | 8:15 a.m. | – | 4:30 p.m. |

The clubhouse is not currently staffed by SFRPD. SFPL holds programs in the clubhouse on Thursdays from 10:15 a.m. to 12:15 a.m., one Saturday per month from 2:00 p.m. to 5:00 p.m., and one Tuesday evening event per month beginning at about 7:00 p.m. SFRPD is considering possible programs or partnerships to keep the clubhouse open for longer hours.

On page 36, in the first full paragraph, the text is revised as follows to reflect changes in pool and clubhouse staffing since publication of the DEIR:

~~The library currently has an average visitor population of 97 people per hour and has a staff 12, with no more than six staff members working at any one time. The clubhouse and pool combined employs four-and-a-half full-time-equivalent staffers, comprising one part-time clubhouse staff person and one full-time and two to three part-time pool house staff people, as needed. The clubhouse does not currently have separate staffing.~~

On page 49, the Project Approvals are modified as follows to correctly state that the proposed project would require a rezoning to a P District; delete reference to Historic Preservation Commission approvals in light of denial of landmark designation to the existing building; reflect the fact that the Recreation and Park Commission must make environmental findings; and add that the Board of Supervisors would have to approve interdepartmental transfer(s) of property:

Planning Commission

- EIR certification and adoption of Environmental Findings.
- Issuance of Recommendation for Rezoning of Assessor's Block 74, Lot 1 from North Beach NCD to P (Public) Use District.

- ~~Conditional Use authorization for a library (public use) in the North Beach Neighborhood Commercial District (Planning Code Section 723.83), to allow the library use in the event that rezoning to P (Public) Use District is not approved.~~
- Adoption of *General Plan* Priority Policy conformity findings concerning vacation of Mason Street and incorporation of the street into Block 74, Lot 1 and/or Block 75, Lot 1.
- Adoption of *General Plan* and Priority Policy conformity findings.

Historic Preservation Commission

- ~~Issuance of a Certificate of Appropriateness (if existing branch building is designated as a City landmark).~~
- ~~Adoption of Environmental Findings (if Certificate of Appropriateness required)~~

Library Commission

- Adoption of Environmental Findings.
- Approval of construction of new branch library and demolition of existing library.

Recreation and Park Commission

- Adoption of Environmental Findings.
- Approval of Joe DiMaggio Playground Master Plan, including removal of existing branch library building, construction of new library at 701 Lombard Street, and renovation of outdoor areas within Joe DiMaggio Playground and on portions of the vacated area of Mason Street.

Arts Commission

- Resolution of approval for the design of the proposed branch library.

Board of Supervisors

- Adoption of Environmental Findings.
- Approval to fully or partially vacate Mason Street, including reservation of rights for existing utilities.
- Approve interdepartmental property transfer to SFRPD.
- Approval of Rezoning of Assessor's Block 74, Lot 1 from North Beach NCD to P (Public) Use District.

Plans and Policies

On page 56, the fourth paragraph is revised as follows to accurately describe the proposed library's compliance with the existing North Beach NCD:

The proposed library is a principally permitted use in P Districts (Planning Code Sec. 234.1), as would be the adjacent public uses on the vacated portion of Mason Street and the playground. ~~If a rezoning of the 701 Lombard Street to a P district were not granted, the proposed library would be permitted in the North Beach NCD with Conditional Use authorization. The proposed library would not be a permitted use at its proposed size without a rezoning.~~

On page 57, the summary paragraph in the middle of the page is revised as follows to accurately state that the proposed project would require a rezoning to a P District:

The Zoning Map amendment is part of the proposed project. The proposed project would comply with the requirements of the P Use District and the 40-X and OS Height and Bulk Districts. ~~If rezoning were not approved, the project would require Conditional Use authorization, the issuance of which would be subject to Section 303 of the Planning Code to permit a library in the North Beach NCD.~~ The project does not propose off-street parking, nor would any off-street parking be required. The project would be required to provide two Class I bicycle spaces and seven Class II spaces, which would be provided for onsite. The project would not obviously conflict with the Planning Code.

On page 78, the entire second full paragraph in the middle of the page is removed as follows to accurately state that the proposed project would require a rezoning to a P District:

~~If 701 Lombard Street is not rezoned to a P Use District, it would remain within the North Beach NCD. The portion of the vacated Mason Street right of way that would be within the footprint of the proposed library would also be zoned to NCD, thereby slightly expanding the area in which permitted or conditionally authorized uses of the North Beach NCD could be built. A Conditional Use authorization would be required to allow the library (a public use) to be located in the NCD, pursuant to Planning Code Sec. 723.83. If the Planning Commission finds the proposed Master Plan necessary and desirable, this Conditional Use Authorization would permit the expansion of the public and civic uses of the existing Joe DiMaggio Playground westward to Columbus Avenue, although it would not preclude future development with non-public uses. It would not result in adverse physical effects and would not divide an established community.~~

Cultural Resources

On page 150, the third paragraph is revised as follows to account for the denial of landmark status to the existing North Beach Branch Library building:

~~The Historic Preservation Commission will consider recommendation of landmark designation for some or all of the Appleton & Wolfard libraries on September 1, 2010. Any recommendation would be reviewed and decided by the Board of Supervisors. At the HPC meeting of September 1, 2010, the HPC recommended to the Board of Supervisors, by a vote of 4 to 3, that the North Beach Branch Library receive landmark designation. Nonetheless, the Board of Supervisors, at its November 9, 2010, meeting, voted 10 to 1 against landmark designation for the North Beach Branch Library. The HPC does not have the power to designate a building a landmark on its own. Therefore, the building is not a local landmark and does not meet the criteria for landmark status.~~

~~It should be noted that adoption of landmark designation for the North Beach Library, by itself and/or as part of a potential Multiple Property Listing, would have the denial of landmark designation has~~ no effect on this EIR's consideration of project effects because, as described above, the North Beach Library and documentation of an Appleton & Wolfard libraries potential

Multiple Property Listing including the North Beach, Parkside, Marina, Merced, and Eureka Valley / Harvey Milk Memorial branches are considered historical resources for CEQA purposes.

Alternatives

On page 234, the first paragraph is revised as follows to accurately state that the Thee-Story Library (701 Lombard Parcel) Alternative would require a rezoning to a P District:

The 701 Lombard Street parcel would be rezoned to a P, (Public) use district where a library would be a principally permitted use, as described in Section 4.A, Land Use and Recreation, in this EIR. ~~Alternatively, the site could retain its existing North Beach NCD use district. In that case, a library within this lot configuration and height would be permitted with Conditional Use authorization. (Planning Code Section 722.82 conditionally permits public uses up to three stories within the North Beach Commercial Use District.)~~