



## Responses to Comments

### 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project

CITY AND COUNTY OF SAN FRANCISCO  
PLANNING DEPARTMENT  
CASE NO. 2011.1300E

STATE CLEARINGHOUSE NO. 2015022048



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

Draft EIR Publication Date:	August 12, 2015
Draft EIR Public Hearing Date:	October 1, 2015
Draft EIR Public Comment Period:	August 13, 2015 to October 5, 2015
Final EIR Certification Hearing	May 12, 2016

Written comments should be sent to:

Sarah B. Jones Environmental Review Officer | 1650 Mission Street, Suite 400 | San Francisco, CA 94103  
or [Sarah.B.Jones@sfgov.org](mailto:Sarah.B.Jones@sfgov.org)



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## SAN FRANCISCO PLANNING DEPARTMENT

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**DATE:** April 28, 2016  
**TO:** Members of the Planning Commission and Interested Parties  
**FROM:** Sarah B. Jones, Environmental Review Officer  
**SUBJECT:** Attached Responses to Comments on Draft Environmental Impact Report for the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project (Planning Department Case No. 2011.1300E)

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Attached for your review please find a copy of the Responses to Comments 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 May 12, 2016. The Planning Commission will receive public testimony on the Final EIR certification at that hearing. Please note that the public review period for the Draft EIR ended on October 4, 2015; any comments received after that date, including any comments provided orally or in writing at the Final EIR certification hearing, will not be responded to in writing.

The Planning Commission does not conduct a hearing to receive comments on the Responses to Comments 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 Responses to Comments document or the Commission's decision to certify the completion of the Final EIR for this project.

Please note that if you receive the Responses to Comments document in addition to the Draft EIR, you technically have the Final EIR. If you have any questions concerning the Responses to Comments document or the environmental review process, please contact Chris Thomas at (415) 575-9036 or [christopher.thomas@sfgov.org](mailto:christopher.thomas@sfgov.org).

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

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**V. Attachments**

All attachments are included on a CD affixed to the back cover of hard copies of this document

- A. Draft EIR Comment Letters
- B. Draft EIR Hearing Transcript
- C. Technical Memo: Analysis of Traffic Volumes Based on Updated Counts
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# I. Introduction

## A. PURPOSE OF THE RESPONSES TO COMMENTS DOCUMENT

The purpose of this Responses to Comments (RTC) document is to present comments on the Draft Environmental Impact Report (EIR) for the proposed 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project (referred to herein as the “proposed project”); to respond in writing to comments on environmental issues; and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to California Environmental Quality Act (CEQA) requirements included in California Public Resources Code Sections 21091(d)(2)(A) and 21091(d)(2)(B), the San Francisco Planning Department (Planning Department) has considered the comments received on the Draft EIR, has evaluated the issues raised, and is providing written responses to the issues raised by commenters. In accordance with CEQA, the responses to comments focus on clarifying the project description and addressing physical environmental issues associated with the proposed project.

No significant new information that warrants recirculation of the Draft EIR is: 1) provided in the comments received on the Draft EIR, or 2) reflected in Draft EIR revisions. The comments do not identify, nor do any revisions result in, any new significant environmental impacts, or substantial increase in the severity of previously identified environmental impacts, or feasible project alternatives or mitigation measures that are considerably different from those analyzed in the Draft EIR that would clearly lessen the significant environmental impacts of the project, but which the project sponsor has not agreed to implement. Therefore, pursuant to Section 15088.5 of the CEQA Guidelines,<sup>1</sup> recirculation of the Draft EIR is not required.

The Draft EIR, together with this RTC document, will be considered by the Planning Commission at a noticed public hearing and, if deemed adequate with respect to accuracy, objectiveness, and completeness, will be certified as a Final EIR. The Final EIR will consist of the Draft EIR, the comments received during the public review period, responses to the comments, any revisions to the Draft EIR that result from public agency and public comments, and any staff-initiated text changes.

## B. ENVIRONMENTAL REVIEW PROCESS

The environmental review process for the proposed project is discussed below. As noted in the Draft EIR, the project site is located within the Showplace Square/Potrero Subarea of the Eastern Neighborhoods Rezoning and Area Plan (Eastern Neighborhoods Plan). The environmental review process for a project occurring within this Plan area is described in this section, followed by the specific environmental review process for the proposed project.

### Background

After several years of analysis, community outreach, and public review, the Eastern Neighborhoods Plan was adopted in December 2008. The Eastern Neighborhoods Plan was an amendment to the San Francisco General Plan, adopted in part to support housing development in some areas previously zoned to allow

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<sup>1</sup> Title 14, California Code of Regulations, Chapter 3, Guidelines for Implementation of the California Environmental Quality Act.

industrial uses, while preserving an adequate supply of space for existing and future production, distribution, and repair (PDR) employment and business uses.

During the Eastern Neighborhoods Plan adoption phase, the Planning Commission held public hearings to consider the various aspects of the proposed area plans, and Planning Code and Zoning Map amendments. On August 7, 2008, the Planning Commission certified the Eastern Neighborhoods Rezoning and Area Plan EIR (*Eastern Neighborhoods PEIR* or *PEIR*) by Motion 17659<sup>2</sup> and adopted the Preferred Project for final recommendation to the Board of Supervisors.<sup>3</sup>

In December 2008, after further public hearings, the Board of Supervisors approved and the Mayor signed the Eastern Neighborhoods rezoning and Planning Code amendments and new Area Plans for Central Waterfront, East SoMa, Mission, and Showplace Square/Potrero. New zoning districts included districts that permit PDR uses in combination with commercial uses; districts mixing residential and commercial uses and residential and PDR uses; and new residential-only districts. The districts replaced then existing industrial, commercial, residential single-use, and mixed-use districts.

The *Eastern Neighborhoods PEIR* was a comprehensive programmatic document that presented an analysis of the environmental effects of implementation of the Eastern Neighborhoods Plan, as well as the potential impacts under several proposed alternative scenarios. The *Eastern Neighborhoods PEIR* evaluated three rezoning alternatives, two community-proposed alternatives which focused largely on the Mission District, and a “No Project” alternative.

A major issue in the Eastern Neighborhoods Plan rezoning process was the degree to which existing industrially-zoned land would be rezoned to primarily residential and mixed-use districts, thus reducing the availability of land traditionally used for PDR employment and businesses. Among other topics, the *Eastern Neighborhoods PEIR* assesses the significance of the cumulative land use effects of the rezoning by analyzing its effects on the City’s ability to meet its future PDR space needs as well as its ability to meet its housing needs as expressed in the City’s General Plan. As part of the *PEIR* analysis, three rezoning options were developed for accommodating the projected population and job growth in the Eastern Neighborhoods. Based upon Department forecasts at the time of the *PEIR*, all three options would have resulted in a decline in PDR employment in the study area and an increase in population and non-PDR related job growth. Of the three options, Option A would have retained the largest amount of land to accommodate existing (i.e., at the time of the *Eastern Neighborhoods PEIR*) PDR uses and the fewest amount of non-PDR related jobs. Conversely, the loss of PDR jobs would have been greatest under Option C because the most land occupied by PDR uses at the time of the *Eastern Neighborhoods PEIR* would have been converted to residential and mixed uses. Option C was also projected to result in the greatest amount of population growth and job growth in non-PDR related jobs. With respect to Option B, population, job growth, and PDR loss within the Eastern Neighborhoods would have fallen between Options A and C.

After fully considering the environmental effects of and the various alternative scenarios discussed in the *Eastern Neighborhoods PEIR*, the alternative adopted by the Planning Commission was a combination of Options B and C. Under this combination known as the “Preferred Project”, the *PEIR* evaluated a total

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<sup>2</sup> San Francisco Planning Department, Eastern Neighborhoods Rezoning and Area Plans Final Environmental Impact Report (PEIR), Planning Department Case No. 2004.0160E, State Clearinghouse No. 2005032048, certified August 7, 2008. Available online at: <http://sf-planning.org/area-plan-eirs>.

<sup>3</sup> San Francisco Planning Commission Motion 17659, August 7, 2008. This document is available online at [http://sf-planning.org/sites/default/files/FileCenter/Documents/1268-EN\\_BOS\\_Vol4\\_CEOA\\_Part7\\_Web.pdf](http://sf-planning.org/sites/default/files/FileCenter/Documents/1268-EN_BOS_Vol4_CEOA_Part7_Web.pdf).

increase of 9,785 dwelling units in the Eastern Neighborhoods area, including 3,180 dwelling units within the Showplace Square/Potrero Area Plan.

The project site is in the Showplace Square/Potrero Area of the Eastern Neighborhoods Area Plan, which contains objectives and policies guiding development of the project site. The project site falls within the 16<sup>th</sup>-17<sup>th</sup> Street Corridor area plan designation (refer to Map 2 – Generalized Zoning Districts), which encourages increased residential density mixed with existing PDR uses along 16<sup>th</sup> Street in acknowledgement of accessibility to nearby transit service. The plan also encourages limited-scale, neighborhood serving retail uses. Pursuant to the Eastern Neighborhoods Rezoning and Area Plans as approved on January 19, 2009, the project site was re-zoned to Urban Mixed Use (UMU) and the 68-X and 48-X height and bulk districts that allow maximum building heights of 68 feet along 16<sup>th</sup> Street and 48 feet on 17<sup>th</sup> Street.<sup>4, 5</sup>

The UMU District is intended to promote a vibrant mix of uses while maintaining the characteristics of this formerly industrially-zoned area. It is also intended to serve as a buffer between residential districts and PDR districts in the Eastern Neighborhoods. The proposed project and its relation to PDR land supply and cumulative land use effects are discussed in the Community Plan Exemption (CPE) Checklist (page 26 in Appendix A to the Draft EIR).

Individual projects that could occur in the future under the Eastern Neighborhoods Rezoning and Area Plans undergo project-level environmental evaluation to determine if they would result in further impacts specific to the development proposal, the site, and the time of development and to assess whether additional environmental review is required.

The proposed project has been determined to be consistent with the zoning controls and the provisions of the Planning Code applicable to the project site.<sup>6, 7</sup>

The environmental review process for the proposed project is discussed below. As previously noted, the project site is located within the Showplace Square/Potrero Subarea of the Eastern Neighborhoods Plan. The environmental review process for a project occurring within this Plan area is described in this section, followed by the specific environmental review process for the proposed project.

### **Project Proposal**

The project sponsor, Potrero Partners, LLC, filed a revised application for the site on June 17, 2014 for the environmental evaluation of the proposed project (this replaced a former 2012 proposal on the site that included residential units and a medical office building). As previously discussed, the project site is located

<sup>4</sup> The following zoning and height district maps were included at the PEIR Certification hearing: [http://sf-planning.org/sites/default/files/FileCenter/Documents/1260-EN\\_Adoption\\_Packet\\_BOS\\_VOL1\\_Zoning%26HeightsMaps\\_web.pdf](http://sf-planning.org/sites/default/files/FileCenter/Documents/1260-EN_Adoption_Packet_BOS_VOL1_Zoning%26HeightsMaps_web.pdf).

<sup>5</sup> On July 21, 2011 the Planning Commission took further action to amend the Zoning Map and make numerous technical corrections, including rezoning the 47 square foot parcel (Block 3949 Lot 001A) within the project site from MUR to UMU and increasing the height limit of that parcel from 40 feet to 68 feet, consistent with the zoning and height limit of surrounding properties. This document is available at: <http://commissions.sfplanning.org/cpcpackets/2011.0559TZ.pdf>.

<sup>6</sup> Adam Varat, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Citywide Planning and Policy Analysis, 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street, September 3, 2014.

<sup>7</sup> Jeff Joslin, San Francisco Planning Department, Community Plan Exemption Eligibility Determination, Current Planning Analysis, 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street, January 22, 2015.

within the Showplace Square/Potrero Subarea of the Eastern Neighborhoods Plan, for which a comprehensive program-level EIR was prepared (the *Eastern Neighborhoods PEIR*). Individual projects that occur under the Plan are required to undergo project-level environmental evaluation to determine if they would result in further impacts specific to the development proposal or the site and to assess whether additional environmental review is required. The San Francisco Planning Department, serving as Lead Agency responsible for administering the environmental review for the proposed project, prepared a CPE Checklist and found that preparation of an EIR was required. The CPE Checklist identified the environmental issues that would be addressed in the EIR and the environmental issues that could be excluded from further detailed analysis.

CEQA requires that, before a decision can be made to approve a project that could result in adverse and unmitigable physical effects, an EIR must be prepared that fully describes the environmental effects of the project. The EIR is a public information document for use by governmental agencies and the public to identify and evaluate potential environmental impacts of a project, to recommend mitigation measures to lessen or eliminate significant adverse impacts, and to examine feasible alternatives to the project. The information contained in the EIR must be reviewed and considered by the Planning Commission and other approving bodies prior to a decision to approve, disapprove, or modify the project.

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 would result in the occurrence of significant adverse impacts that cannot feasibly be mitigated to less-than-significant levels, the agency must state the reasons for its action in writing, demonstrate that mitigation is infeasible based on the EIR or other information in the record, and adopt a Statement of Overriding Considerations.

### **Notice of Preparation and Community Plan Exemption Checklist**

The Planning Department prepared the CPE Checklist and published a Notice of Preparation (NOP) of an EIR for the project on February 11, 2015, announcing its intent to prepare and distribute a focused EIR (the NOP and CPE Checklist is Appendix A to this EIR). The CPE Checklist found that the proposed project would be generally consistent with and was encompassed within the analysis in the *Eastern Neighborhoods PEIR*. The CPE Checklist also determined that the *Eastern Neighborhoods PEIR* adequately anticipated and described the majority of the impacts of the proposed project, and identified the mitigation measures from the *Eastern Neighborhoods PEIR* applicable to the proposed project. The proposed project is also generally consistent with the zoning controls and the provisions of the Planning Code applicable to the project site and is in conformance with the height, use, and density for the site described in the *Eastern Neighborhoods PEIR*.

The CPE Checklist found that the following potential individual and cumulative environmental effects of the proposed project, as fully analyzed in the CPE Checklist, were adequately covered in the *Eastern Neighborhoods PEIR*: land use and land use planning; aesthetics; population and housing; paleontological and archeological resources; noise; air quality; greenhouse gas emissions; wind and shadow; recreation; utilities and service systems; public services; biological resources; geology and soils; hydrology and water quality; hazards and hazardous materials; mineral and energy resources; and agriculture and forest resources. As such, these issue topics were not further addressed in the Draft EIR.

The CPE Checklist determined that the proposed project could result in potentially significant environmental impacts, and that an EIR is required under CEQA to analyze the following environmental topics: Transportation and Circulation and Historic Architectural Resources.

### **Draft EIR Public Review**

The Planning Department prepared the Draft EIR for the proposed project in accordance with CEQA, the CEQA Guidelines in Title 14 of the California Code of Regulations, and Chapter 31 of the San Francisco Administrative Code. The Draft EIR was published on August 12, 2015, and circulated to local, state, and federal agencies, and to interested organizations and individuals. A public comment period was held from August 13, 2015 to October 4, 2015 (extended from September 28, 2015), to solicit public comments on the adequacy and accuracy of information presented in the Draft EIR.

During the public comment period, a public hearing was held at the San Francisco Planning Commission on October 1, 2015 (continued from the original date of September 17, 2015). The comments received during the public review period and at the hearing are the subject of this RTC document, which addresses all substantive written and verbal comments on the Draft EIR.

### **Responses to Comments Document and Final EIR**

This RTC document has been distributed to the San Francisco Planning Commission and State Clearinghouse, as well as to the agencies, organizations, and individuals who commented on the Draft EIR. This RTC document, together with the Draft EIR, constitutes the Final EIR for the proposed project. The Planning Commission will review and consider the information presented in the Final EIR and, at a public hearing scheduled for May 12, 2016, will decide whether to certify that the Final EIR has been completed in compliance with CEQA. In the event the Planning Commission's certification decision is appealed, the San Francisco Board of Supervisors would hear and make a final determination on any such appeal. The City decision-makers will consider the certified Final EIR, along with other information and the public process, to determine whether to approve, modify, or disapprove the proposed project and to specify any applicable environmental conditions as part of project approvals. If the City approves the proposed project, it will adopt environmental findings and a Mitigation Monitoring and Reporting Program (MMRP) at the project decision hearing. The CEQA Guidelines (Section 15097) require preparation of an MMRP, which is designed to ensure that mitigation measures identified in the Final EIR to reduce or avoid the project's significant environmental effects are implemented. The project proponent would be required to implement the MMRP as a condition of project approval.

CEQA also requires the adoption of findings prior to approval of a project for which a certified EIR identifies significant environmental effects (CEQA Guidelines Sections 15091 and 15092). Because this EIR identifies significant adverse impacts that cannot be mitigated to less-than-significant levels, the findings must include a Statement of Overriding Considerations for those impacts (CEQA Guidelines Section 15093[b]) for the proposed project to be approved. A Statement of Overriding Considerations must explain why any such unavoidable significant effects are acceptable due to overriding considerations, pursuant to CEQA Guidelines Section 15093.

## C. DOCUMENT ORGANIZATION

This RTC document consists of the following sections:

- **Chapter I – Introduction:** This chapter discusses the purpose of the RTC document, the environmental review process, and the organization of the RTC document.
- **Chapter II – Revisions to Draft EIR Analysis Approach:** This chapter introduces revisions to the Draft EIR, which address text changes as a result of local implementation of Senate Bill (SB) 743 through Planning Commission Resolution 19579. This chapter includes revisions to the Draft EIR related to vehicle miles traveled and induced automobile travel impact analysis in addition to automobile delay impact analysis.
- **Chapter III – List of Persons Commenting:** This chapter presents a list of the agencies, organizations, and individuals who submitted written comments during the public review period or spoke at the public hearing on the Draft EIR. Comments are organized by agency (federal, state, regional, and local), and individuals and organizations. The chapter identifies whether the comments were submitted in writing (letter or e-mail) and/or verbally at the Draft EIR public hearings (transcript).
- **Chapter IV – Responses to Comments:** This chapter contains responses to all substantive comments received on the Draft EIR, organized by topic in the order the topics were presented in the Draft EIR, followed by the order topics were presented in the CPE, if not included in the Draft EIR.

Each comment has been coded by subject area and assigned a two-part comment number based on the environmental topic abbreviations listed below, and on the order of presentation under each topic. Each response has been assigned a corresponding number. For example, the first comment pertaining to Alternatives is “Comment AL-1,” and the response to that comment is “Response AL-1.” The second comment and response regarding alternatives are “Comment AL-2,” and “Response AL-2,” respectively. The direct quotes from the respective comment letter and/or transcript pertaining to the comment are listed below the comment number, followed by the response.

The environmental subject area abbreviations used in this document are as follows:

Plans and Policies (PO)  
Environmental Setting and Impacts (ES)  
Transportation and Circulation (TR)  
Historic Architectural Resources (CP)  
Alternatives (AL)  
Land Use and Planning (LU)  
Population and Housing (PH)  
Noise (NO)  
Air Quality (AQ)  
Recreation (RE)

Utilities and Service Systems (UT)

Hazards and Hazardous Materials (HZ)

Aesthetics (AE)

General Comments (GC)

The responses in some cases provide clarification of the EIR text, but some revisions to the Draft EIR text have been made in response to comments received. Double-underlined text is used to represent language added or modified in the Draft EIR; ~~strikethrough~~ text is used to represent language deleted from the Draft EIR.

The comment letters are presented in their entirety in Attachment A of this RTC document, and are grouped by agencies, and individuals and organizations, then organized by date and alphabetical order by last name within the same date. The hearing transcript is presented in Attachment B of this RTC document.

The subject matter of one topic may overlap with that of other topics, so the reader must occasionally refer to more than one group of comments and responses to review all the information on a given subject. Cross-references are provided where necessary.

- **Chapter V: Draft EIR Revisions** – This chapter includes all of the changes to the Draft EIR text noted in the responses to the comments received. Staff-initiated changes to clarify information presented in the Draft EIR are also included, as applicable, and are highlighted by an asterisk (\*) in the margin to distinguish them from text changes in response to comments. This chapter does not repeat Draft EIR Revisions provided in Chapter II.

This RTC document will be incorporated into the Final EIR as a new section. The changes to the EIR's text and figures included in Sections II and V will be incorporated into the Final EIR text. This RTC document, together with the Draft EIR, will constitute the Final EIR.

## II. Revisions to Draft EIR Analysis Approach

### A. INTRODUCTION

This chapter of the Responses to Comments (RTC) document introduces revisions to the Draft EIR, which address text changes as a result of local implementation of Senate Bill (SB) 743 through Planning Commission Resolution 19579.

CEQA Guidelines Section 15088.5 requires recirculation of an EIR when “significant new information” is added to the EIR after publication of the Draft EIR and before certification. New 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 ... 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 to a less-than-significant level), or identification of a new feasible alternative or mitigation measure that would lessen the environmental impacts of the proposed project that the project sponsor is unwilling to adopt. CEQA Guidelines Section 15088.5(d) states that recirculation is not required if “new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

The proposed changes to the Draft EIR described below do not present significant new information with respect to the proposed project, would not result in any new significant environmental impacts or present new feasible alternatives or mitigation measures, and would not result in a substantial increase in the severity of a significant impact identified in the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project Draft EIR. Therefore, recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5 is not required.

### B. REVISIONS TO DRAFT EIR ANALYSIS APPROACH IN RESPONSE TO SENATE BILL 743 AND PLANNING COMMISSION RESOLUTION 19579

On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. As noted in the Draft EIR on page IV.2, Public Resources Code Section 21099 requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the “reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” The statute provides that, upon certification and adoption of the revised CEQA Guidelines by the Secretary of the Natural Resources Agency, “automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment.” In other words, LOS or any other automobile delay metric more generally shall not be used as a significance threshold under CEQA.

Since publication of the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project Draft EIR (Draft EIR) on August 12, 2015, the California Office of Planning and Research (OPR) published for public review and comment a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (“proposed transportation impact guidelines”) in January 2016.<sup>8</sup> OPR’s proposed transportation impact guidelines

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<sup>8</sup> This document is available online at: [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php).



recommends that transportation impacts can be best measured using an alternative metric known as vehicle miles traveled (VMT). VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle.

OPR's proposed transportation impact guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA in San Francisco, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA in San Francisco for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.
- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects in the City that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental analysis.

The Draft EIR was prepared prior to Planning Commission Resolution 19579, and, therefore included analysis pertaining to the automobile delay effects of this proposed project and did not include impact analysis pertaining to VMT and induced demand. However, the Draft EIR did include VMT analysis for informational purposes. Because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA. Draft EIR Section IV.A has been modified to include VMT and an induced automobile travel impact analysis. In other words, because the timing of preparation of this EIR has coincided with the shift from automobile delay to VMT under the Planning Commission's resolution, this EIR considers traffic impacts of the proposed project under both metrics.

The text changes to address revisions as a result of local implementation of SB 743 through Planning Commission Resolution 19579 are presented below by Draft EIR page and paragraph number. Chapter V, Draft EIR Revisions, of this RTC document, includes additional revisions unrelated to this topic.

Portions of the Draft EIR that have been revised are shown as indented text. New or revised text is double-underlined; deleted material is shown in ~~strike through~~.

**Text Changes to Summary – Chapter S***Table S-1: Summary of Impacts and Mitigation Measures*

A project-level impact evaluation for VMT and induced automobile travel has been added to Table S-1, on page S.12, as follows:

Environmental Impacts	Level of Significance Without Mitigation	Mitigation/Improvement Measure	Level of Significance With Mitigation
<b>Transportation and Circulation</b>			
<u>Impact TR-10: The proposed project would not cause substantial additional VMT nor substantially induce automobile travel. (Less-than-significant)</u>	<u>LTS</u>	<u>None Required</u>	

An impact evaluation for cumulative regional VMT has been added to Table S-1, on page S.14, as follows:

<u>Impact C-TR-7: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a considerable contribution to cumulative regional VMT. (Less-than-significant)</u>	<u>LTS</u>	<u>None Required</u>	
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*Summary of Project Alternatives*

The last paragraph on page S.22 has been revised, as follows:

A comparison of significant impacts of the proposed project to impacts of the alternatives is shown in **Table S-4**. An analysis of the effects of both automobile delay as described by LOS and the effects of VMT and induced automobile travel is included in the comparison. Other than the No Project Alternative, the Reduced Density Alternative is identified as the environmentally superior alternative in regards to the effects of automobile delay as described by LOS because it would to some extent meet the project sponsor's basic objectives, while avoiding all but one of the traffic-related significant unavoidable impacts of the proposed project. This impact reduction would be achieved because this alternative would have fewer residential units and less commercial space at the site compared to the proposed project, and therefore have associated reductions in localized vehicle traffic compared to the proposed project.

By contrast, other than the No Project Alternative, the ~~Reduced Density~~ Metal Shed Reuse Alternative is identified as the environmentally superior alternative in regards to the effects of VMT and induced automobile travel, where automobile delay would not be considered an impact, because it would to some extent meet the project sponsor's basic objectives, while ~~avoiding all but one of the traffic-related significant unavoidable impacts of the proposed project~~ retaining some PDR space (about 55,000 square feet for artists' work and exhibit space) and therefore reducing the project's contribution to the cumulative significant unavoidable impact related to loss of PDR.

Table S-4: Comparison of Significant Impacts of the Proposed Project to Impacts of Alternatives

The following rows have been added to Table S-4, starting on page S.24, as follows (note that these same revisions are made to VI-8 starting on page VI.34):

Description of Topic	Environmental Impacts	No Project Alternative	Reduced Density Alternative	Metal Shed Reuse Alternative
<b>Transportation and Circulation</b>				
VMT and Induced Automobile Travel	<u>Impact TR-10: The proposed project would not cause substantial additional VMT nor substantially induce automobile travel. (LTS)</u>	Not applicable	<u>Same impacts as the proposed project (LTS)</u>	<u>Same impacts as the proposed project (LTS)</u>
Cumulative VMT and Induced Automobile Travel	<u>Impact C-TR-7: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a considerable contribution to cumulative regional VMT. (Less-than-significant)</u>	Not applicable	<u>Same impacts as the proposed project (LTS)</u>	<u>Same impacts as the proposed project (LTS)</u>

*Areas of Known Controversy and Issues to be Resolved*

The following paragraph has been added after the last paragraph on page S.31 and a new footnote has been added to that page, as follows:

An additional issue is the local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, as they relate to the proposed project and this EIR. On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. As noted in the Draft EIR on page IV.2, Public Resources Code Section 21099 requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the “reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” The statute provides that, upon certification and adoption of the revised CEQA Guidelines by the Secretary of the Natural Resources Agency, “automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment.” In other words, LOS or any other automobile delay metric more generally shall not be used as a significance threshold under CEQA.

Since publication of the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project Draft EIR (Draft EIR) on August 12, 2015, the California Office of Planning and Research (OPR) published for public review and comment a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (“proposed transportation impact guidelines”) in January 2016.<sup>9</sup> OPR’s proposed transportation impact guidelines recommends that transportation impacts can be best measured using an alternative metric known as vehicle miles traveled (VMT). VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle.

OPR’s proposed transportation impact guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.

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<sup>9</sup> This document is available online at: [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php).

- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental analysis.

The Draft EIR included analysis pertaining to the automobile delay effects of this proposed project and did not include impact analysis pertaining to VMT and induced demand. Because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA. Draft EIR Section IV.A has been modified to include VMT and an induced automobile travel impact analysis. In other words, because the timing of preparation of this EIR has coincided with the shift from automobile delay to VMT under the Planning Commission's resolution, this EIR considers traffic impacts of the proposed project under both metrics.

### **Text Changes to Introduction – Chapter I**

#### *Project Proposal*

The last paragraph on page I.6 has been revised and an additional paragraph added, as follows:

As noted in the Summary, the proposed project is subject to Section 21099 to the California Public Resources Code, which eliminates consideration of impacts related to the topics of aesthetics and parking in determining the significance of physical environmental effects under CEQA for projects meeting certain criteria. Accordingly, this EIR does not contain a separate discussion of impacts related to the topic of aesthetics. The EIR nonetheless provides an overview of the existing and proposed visual character of the site and surroundings for informational purposes as part of Chapter II, Project Description. Furthermore, this EIR discusses parking in Chapter IV.A, Transportation and Circulation, for informational purposes only. Overall, the information regarding aesthetics (visual character) and parking provided here does not relate to the impact significance determinations in the EIR.

The proposed project is also subject to Planning Commission Resolution 19579, which eliminates consideration of impacts related to the topics of automobile delay in determining significance of physical environmental effects under CEQA for all projects where San Francisco is the lead agency. However, because the public comment period for the Draft EIR ended prior to the adoption of Planning Commission Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation.

## **Text Changes to Environmental Setting and Impacts – Chapter IV**

### *Public Resources Code Section 21099*

The last paragraph on page IV.2 and the first three paragraphs on page IV.3 have been revised and a new footnote has been added to that page, as follows:

OPR released a preliminary discussion draft of the new CEQA Guidelines (discussion draft) to implement Section 21099 in August 2014.<sup>21</sup> Another draft, ~~is expected in 2015, at which point OPR will receive further public comment~~ a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (“proposed transportation impact analysis guidelines”), was published for public review and comment from January 2016 through February 2016.<sup>22</sup> After receiving feedback during that public comment period, OPR will submit suggested changes of the CEQA Guidelines to the Secretary of the Natural Resources Agency for the formal rulemaking and adoption process. Once the Secretary of the Natural Resources Agency adopts the CEQA Guidelines changes, they will be sent to the Office of Administrative Law for approval. When the Office of Administrative Law adopts the CEQA Guidelines changes, for lead agencies who elect to be governed by these provisions, they provisions will become effective immediately, which is anticipated sometime in late 2015 ~~or early 2016 or early 2017~~. According to the proposed transportation impact analysis guidelines, after two years from the adoption date, the provisions of the section shall apply statewide. Therefore, the LOS-related provisions of Public Resources Code Section 21099 are not yet applicable to the proposed project and this EIR analyzes the traffic-related impacts of the proposed project as they pertain to LOS. However, in response to public comments concerning the forthcoming CEQA Guidelines changes, the following analysis is provided for informational purposes.

As stated above, OPR is currently updating the discussion draft. The discussion draft may undergo revisions in response to public input. As of the time of publication of this EIR, the discussion draft states that transportation impacts can be best measured using an alternative metric known as vehicle miles traveled (VMT). VMT quantifies the total distance traveled by automobiles that are estimated to result from a project, accounting for the number of passengers, the distance they travel to get to destinations, and the probability that people choose to make trips in automobiles rather than by other modes. Typically, development at a greater distance from other uses, located in areas with poor access to non-automobile modes of travel, would generate more driving than one that is located proximate to other complementary uses and/or where there are transportation options other than the automobile.

For land use projects, OPR proposes that a project that results in VMT (per capita, per service population, or other appropriate measure) greater than the regional average for the land use type (e.g., residential, employment, commercial) may indicate a significant impact. For this proposed project, regional refers to the nine county Bay Area metropolitan region. As of 2012, the Bay Area regional VMT per person trip<sup>22</sup> for residential uses and retail uses is approximately 4.6 and 3.5, respectively. Utilizing trip generation rates from the City’s Transportation Impact Analysis Guidelines for Environmental Review and automobile modal split, trip length, and vehicle occupancy estimates for the project’s location from San Francisco Chained Activity Modeling Process (SF CHAMP), the proposed project’s residential and retail uses would result in a VMT per person trip of approximately 1.8 and 2.9, respectively. This is approximately 61 percent below the regional average for residential uses and 17 percent below the regional average for retail uses.

~~OPR also proposed that development projects that are located within a transit priority area generally may be considered to have a less than significant transportation impact. As stated above, the proposed project is located in a transit priority area.~~

OPR's proposed transportation impact guidelines recommends that transportation impacts can be best measured using an alternative metric known as vehicle miles traveled (VMT). VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle.

OPR's proposed transportation impact guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.
- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental analysis.

The Draft EIR included analysis pertaining to the automobile delay effects of this proposed project and did not include impact analysis pertaining to VMT and induced demand. Because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA. Draft EIR Section IV.A has been modified to include VMT and an induced automobile travel impact analysis. In other words, because the timing of preparation of this EIR has coincided with the shift from automobile delay to VMT under the Planning Commission's resolution, this EIR considers traffic impacts of the proposed project under both metrics.



## Footnotes:

<sup>21</sup> Governor's Office of Planning and Research, Updating Transportation Impacts Analysis in the CEQA Guidelines, 8/6/2014, available at: [http://opr.ca.gov/docs/Final\\_Preliminary\\_Discussion\\_Draft\\_of\\_Updates\\_Implementing\\_SB\\_743\\_080614.pdf](http://opr.ca.gov/docs/Final_Preliminary_Discussion_Draft_of_Updates_Implementing_SB_743_080614.pdf).

<sup>22</sup> This document is available online at: [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php).

**Text Changes to Transportation and Circulation – Chapter IV.A***Environmental Setting*

The following language has been added within the fourth paragraph on page IV.A.1 and a new section “Regional and City Vehicular Miles Traveled” has been added after the fourth paragraph, as follows:

This section provides a description of the existing transportation conditions in the vicinity of the project site. Included in this section are descriptions of existing regional and City vehicular miles traveled (VMT), roadway, circulation, transit, pedestrian, bicycle, loading, and parking conditions.

**Background on Vehicle Miles Traveled in San Francisco and Bay Area**

Many factors affect travel behavior. These factors include density, diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit, development scale, demographics, and transportation demand management. Typically, low-density development at great distance from other land uses, located in areas with poor access to non-private vehicular modes of travel, generate more automobile travel compared to development located in urban areas, where a higher density, mix of land uses, and travel options other than private vehicles are available.

Given these travel behavior factors, San Francisco has a lower VMT ratio than the nine-county San Francisco Bay Area region. In addition, some areas of the City have lower VMT ratios than other areas of the City. These areas of the City can be expressed geographically through transportation analysis zones. Transportation analysis zones are used in transportation planning models for transportation analysis and other planning purposes. The zones vary in size from single city blocks in the downtown core, multiple blocks in outer neighborhoods, to even larger zones in historically industrial areas like the Hunters Point Shipyard.

The San Francisco County Transportation Authority (Transportation Authority) uses the San Francisco Chained Activity Model Process (SF-CHAMP) to estimate VMT by private automobiles and taxis for different land use types. Travel behavior in SF-CHAMP is calibrated based on observed behavior from the California Household Travel Survey 2010-2012, Census data regarding automobile ownership rates and county-to-county worker flows, and observed vehicle counts and transit boardings. SF-CHAMP uses a synthetic population, which is a set of individual actors that represents the Bay Area's actual population, who make simulated travel decisions for a complete day. The Transportation Authority uses tour-based analysis for office and residential uses, which examines the entire chain of trips over the course of a day, not just trips to and from the project. For retail uses, the Transportation Authority uses trip-based analysis, which counts VMT from individual trips to and from the project (as opposed to entire chain of trips). A trip-based approach, as opposed to a tour-based approach, is necessary for retail projects because a tour is

likely to consist of trips stopping in multiple locations, and the summarizing of tour VMT to each location would over-estimate VMT.<sup>28, 29</sup> As discussed below under the Vehicle Miles Traveled Analysis, for residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent or if it exceeds the regional VMT per retail employee minus 15 percent. This approach is consistent with CEQA Section 21099 and the thresholds of significance for other land uses recommended in OPR's proposed transportation impact guidelines. For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above.

For residential development, the regional average daily VMT per capita is 17.2.<sup>30</sup> For retail development, regional average daily work-related VMT per employee is 14.9.<sup>31</sup> Refer to Table IV.A-1 - Daily Vehicle Miles Traveled, which includes the transportation analysis zone in which the project site is located, 651.

**Table IV.A-1 - Daily Vehicle Miles Traveled**

<u>Land Use</u>	<u>Bay Area</u>		<u>TAZ 651</u>
	<u>Regional Average</u>	<u>Regional Average minus 15%</u>	
<u>Households (Residential)</u>	<u>17.2</u>	<u>14.6</u>	<u>6.5</u>
<u>Employment (Retail)</u>	<u>14.9</u>	<u>12.6</u>	<u>10.7</u>

**Footnotes:**

<sup>28</sup> To state another way: a tour-based assessment of VMT at a retail site would consider the VMT for all trips in the tour, for any tour with a stop at the retail site. If a single tour stops at two retail locations, for example, a coffee shop on the way to work and a restaurant on the way back home, then both retail locations would be allotted the total tour VMT. A trip-based approach allows us to apportion all retail-related VMT to retail sites without double-counting.

<sup>29</sup> San Francisco Planning Department, Executive Summary: Resolution Modifying Transportation Impact Analysis, Appendix F, Attachment A, March 3, 2016.

<sup>30</sup> Includes the VMT generated by the households in the development.

<sup>31</sup> Retail travel is not explicitly captured in SF-CHAMP, rather, there is a generic "Other" purpose which includes retail shopping, medical appointments, visiting friends or family, and all other non-work, non-school tours. The retail efficiency metric captures all of the "Other" purpose travel generated by Bay Area households. The denominator of employment (including retail; cultural, institutional, and educational; and medical employment; school enrollment, and number of households) represents the size, or attraction, of the zone for this type of "Other" purpose travel.

All following Tables IV.A-1 through IV.A-18 and related references to those tables would be renumbered to IV.A-2 through IV.A-19, respectively.

### *Impacts and Mitigation Measures*

The paragraph under the heading IMPACTS AND MITIGATION MEASURES on page IV.A.26 has been revised as follows:

This section analyzes the impacts to the transportation system that could result from the proposed project. The analysis includes the effects of automobile delay as described by LOS and the effects of VMT and induced automobile travel. The section begins with the significance criteria, which establishes the thresholds for determining whether an impact is significant. The latter part of this section presents the impacts associated with the proposed project.

Two new bullets on page IV.A.27 have been added under the “Significance Criteria” heading, as follows):

- The project would have a significant effect on the environment if it would cause substantial additional VMT.
- The project would have a significant effect on the environment if it would substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow lanes) or by adding new roadways to the network.

The second and third sentence in the last paragraph on page IV.A.27 has been revised under the “Approach to Analysis” heading, as follows:

This section presents the methodology for analyzing transportation impacts and information considered in developing travel demand for the proposed project. The impacts of the proposed project on surrounding roadways were analyzed using the guidelines set forth in the SF Guidelines and Planning Commission Resolution 19579 and supporting materials. The SF Guidelines and Planning Commission Resolution 19579 and supporting materials provide direction for analyzing transportation conditions and identifying the transportation impacts of a proposed project in San Francisco.

Two new sections “Vehicle Miles Traveled Analysis” and “Induced Automobile Travel Analysis” have been added on page IV.A.30 following “Parking Analysis” under the “Impact Analysis Methodology” heading, as follows:

#### *Vehicle Miles Traveled Analysis*

Land use projects and plans may cause substantial additional VMT. The following identifies thresholds of significance and screening criteria used to determine if a land use project or plan would result in significant impacts under the VMT metric.

#### *Residential and Retail Projects*

As noted above, for residential projects, a project would generate substantial additional VMT if it exceeds the regional household VMT per capita minus 15 percent.<sup>33</sup> As documented in the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (“proposed transportation impact guidelines”), a 15 percent threshold below existing development is “both reasonably ambitious and generally achievable.”<sup>34</sup> The Planning Department uses a VMT efficiency metric approach: a project would generate substantial additional VMT if it exceeds the regional

VMT per retail employee minus 15 percent. This approach is consistent with CEQA Section 21099 and the thresholds of significance for other land uses recommended in OPR's proposed transportation impact guidelines. For mixed-use projects, each proposed land use is evaluated independently, per the significance criteria described above.

OPR's proposed transportation impact guidelines provides screening criteria to identify types, characteristics, or locations of land use projects that would not exceed these VMT thresholds of significance. OPR recommends that if a project or land use proposed as part of the project meet any of the below screening criteria, then VMT impacts are presumed to be less than significant for that land use and a detailed VMT analysis is not required. The screening criteria applicable to the project and how they are applied in San Francisco are described below:

- Map-Based Screening for Residential, Office, and Retail Projects. OPR recommends mapping areas that exhibit where VMT is less than the applicable threshold for that land use. Accordingly, the Transportation Authority has developed maps depicting existing VMT levels in San Francisco for residential and retail land uses based on the SF-CHAMP 2012 base-year model run. The Planning Department uses these maps and associated data to determine whether a proposed project is located in an area of the City that is below the VMT threshold.
- Proximity to Transit Stations. OPR recommends that residential, retail, and office projects, as well projects that are a mix of these uses, proposed within ½ mile of an existing major transit stop (as defined by CEQA Section 21064.3) or an existing stop along a high quality transit corridor (as defined by CEQA 21155) would not result in a substantial increase in VMT. However, this presumption would not apply if the project would: have a floor area ratio of less than 0.75; (2) include more parking for use by residents, customers, or employees of the project than required or allowed, without a conditional use; or (3) is inconsistent with the applicable Sustainable Communities Strategy.<sup>35</sup>

#### Induced Automobile Travel Analysis

Transportation projects may substantially induce additional automobile travel. The following identifies thresholds of significance and screening criteria used to determine if transportation projects would result significant impacts by inducing substantial additional automobile travel.

Pursuant to OPR's proposed transportation impact guidelines, a transportation project would substantially induce automobile travel if it would generate more than 2,075,220 VMT per year. This threshold is based on the fair share VMT allocated to transportation projects required to achieve California's long-term greenhouse gas emissions reduction goal of 40 percent below 1990 levels by 2030.

OPR's proposed transportation impact guidelines includes a list of transportation project types that would not likely lead to a substantial or measureable increase in VMT. If a project fits within the general types of projects (including combinations of types) described below, then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required. Accordingly, the proposed project would not result in a substantial increase in VMT because it would include the following components and features:

- Active Transportation, Rightsizing (aka Road Diet), and Transit Projects:

- Infrastructure projects, including safety and accessibility improvements, for people walking or bicycling
- Installation or reconfiguration of traffic calming devices
- Other Minor Transportation Projects:
  - Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not utilized as through lanes
  - Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features
  - Timing of signals to optimize vehicle, bicycle or pedestrian flow on local or collector streets
  - Addition of transportation wayfinding signage
  - Removal of off- or on-street parking spaces
  - Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs)

## Footnotes:

<sup>33</sup> OPR's proposed transportation impact guidelines states a project would cause substantial additional VMT if it exceeds both the existing City household VMT per capita minus 15 percent and existing regional household VMT per capita minus 15 percent. In San Francisco, the City's average VMT per capita is lower (8.4) than the regional average (17.2). Therefore, the City average is irrelevant for the purposes of the analysis.

<sup>34</sup> This document is available online at: [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php), page III:20.

<sup>35</sup> A project is considered to be inconsistent with the Sustainable Communities Strategy if development is located outside of areas contemplated for development in the Sustainable Communities Strategy.

A new section "Vehicle Miles Traveled Analysis" has been added on page IV.A.38 following "Caltrain Electrification and High Speed Rail" under the "Analysis Approach Specific to 2025 Cumulative Conditions" heading, as follows:

Vehicle Miles Traveled Analysis

San Francisco 2040 cumulative conditions were projected using a SF-CHAMP model run, using the same methodology as outlined in the Environmental Setting for existing conditions, but includes residential and job growth estimates and reasonably foreseeable transportation investments through 2040. A 2040 model year was assumed, as opposed to 2025, to be consistent with Planning Commission Resolution 19579 for VMT analysis. For residential development, the projected 2040 regional average daily VMT per capita is 16.1. Projected 2040 average daily VMT per capita is 4.0 for the transportation analysis zone the project site is located in, 651. For retail development, regional average daily retail VMT per employee is 14.6. Projected 2040 average daily retail VMT per employee is 10.7 for transportation analysis zone 651.

Residential and Job Growth Estimates

The projected 2040 residential and job growth estimates are prepared by Association and Bay Area Governments and adjusted by the San Francisco Planning Department. The land use scenario uses

projections from the Sustainable Communities Strategy: Jobs-Housing Connections from Plan Bay Area, which includes growth assumed in the Eastern Neighborhoods.<sup>37</sup>

Transportation Network Changes

Transportation network changes include those described above, as well as reasonably foreseeable transportation projects that would affect travel behavior in San Francisco and the region such as Better Market Street, Van Ness Bus Rapid Transit, and Geary Bus Rapid Transit.<sup>38</sup>

Footnotes:

<sup>37</sup> Manoj Madhavan and Chris Espiritu, San Francisco Planning Department, Memo to Transportation Team, "CEQA – 2040 SF-CHAMP Modeling Methodology Assumptions", April 25, 2016.

<sup>38</sup> Ibid.

The second paragraph on page IV.A.41 has been revised as follows:

Under Existing Conditions, the eastbound (worst) approach of the unsignalized intersection of Mariposa Street and the I-280 southbound on-ramp operates at LOS F during the PM peak hour, and Caltrans signal warrants would be met. Under Existing Plus Project conditions, the LOS of this intersection would remain at LOS F, and the Caltrans signal warrants would continue to be met. The proposed project would add 65 vehicle trips to the worst (eastbound) approach during the PM peak hour, representing 8.7 percent of the total PM peak hour eastbound approach volume. The proposed project's contribution to this approach would represent a substantial contribution, and therefore, the proposed project would be considered to have a significant impact to the unacceptable operating conditions at the intersection of Mariposa Street and the I-280 southbound on-ramp. However, the Mission Bay South Infrastructure Plan Mitigation Measure E.17b would signalize this intersection as part of the Mission Bay South Owner Participation Agreement. These changes are certain, they are already under way, and are estimated to be ~~completed by December 2015~~ operational in the second half of 2016, prior to the proposed project's operation.<sup>40</sup> With the proposed improvements, the intersection would operate at LOS A during the Existing Plus Project weekday PM peak hour conditions. Therefore, because the implementation of the measures would occur prior to the proposed project becoming operational, the proposed project would have a less-than-significant impact on the intersection of Mariposa Street and the I-280 Southbound on-ramp.

The last two paragraphs on page IV.A.46 have been revised under "Impact TR-3", as follows:

The proposed project would add vehicle trips to streets with Muni bus service, including 16th Street, 18th Street, Rhode Island Street, and De Haro Street. However, as the relevant intersections and approaches ~~are would continuing continue~~ to operate at an acceptable LOS D or better, it is expected that these project-related vehicle trips would not affect transit operations and would generally not be in direct conflict with Muni buses and light rail vehicles. In addition, the proposed project would not be adding any new curb cuts which could create substantial delays from vehicle queuing on any of the roadways which Muni operates upon. Furthermore, no bus and light rail stop locations exist directly adjacent to the project site. The nearest bus stop is located at 16th Street and Missouri Street and the nearest light rail stop is located at 3rd Street and South Street. As such, the proposed project would not substantially affect Muni transit operations (i.e., delays or

operating costs). Therefore, the proposed project would have a less-than-significant impact on Muni transit operations.

It should be noted that the ~~proposed project's retail uses would be subject to the~~ San Francisco Board of Supervisors approved amendments to the San Francisco Planning Code, referred to as the Transportation Sustainability Fee (Ordinance 200-154, effective December 25, 2015). The fee updated, expanded, and replaced the prior Transit Impact Development Fee (TIDF). The TIDF Transportation Sustainability Fee attempts to recover the cost of carrying additional transit riders generated by new development by obtaining fees on a square footage basis. TIDF Transportation Sustainability Fee funds may be used to increase transit service. The proposed project's residential and retail uses would be subject to the Transportation Sustainability Fee. It should also be noted that San Francisco is currently proposing to replace the Transit Impact Development Fee with one that covers more types of development. The new fee would be called the Transportation Sustainability Fee and would provide additional revenue to help fill the City's transportation funding gap (Board of Supervisors File Number 150790).

A new Impact statement, "Impact TR-10", to discuss vehicle miles traveled and induced automobile travel analyses, has been added as the last item before the "2025 Cumulative-Level Impact Evaluation" heading on page IV.A.63, as follows:

Impact TR-10: The proposed project would not cause substantial additional VMT nor substantially induce automobile travel. (Less-than-significant)

#### Vehicle Miles Traveled Analysis – Residential

As mentioned above, existing average daily VMT per capita is 6.5 for the transportation analysis zone the project site is located in, 651. This is 62 percent below the existing regional average daily VMT per capita of 17.2. Given the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the proposed project's residential uses would not result in substantial additional VMT and impacts would be less-than-significant. Furthermore, the project site meets the Proximity to Transit Stations screening criterion, which also indicates the proposed project's residential uses would not cause substantial additional VMT.<sup>36</sup>

#### Vehicle Miles Traveled Analysis – Retail

Existing average daily VMT per retail employee is 10.7 for the transportation analysis zone 651. This is 28 percent below the existing regional average daily VMT per retail employee of 14.9. Given the project site is located in an area where existing VMT is more than 15 percent below the existing regional average, the proposed project's retail uses would not cause substantial additional VMT and impacts would be less-than-significant. Furthermore, the project site is within an adopted Infill Opportunity Zone, which also indicates the proposed project's retail uses would not cause substantial additional VMT.<sup>37</sup>

#### Induced Automobile Travel Analysis

The proposed project is not a transportation project. However, the proposed project would include features that would alter the transportation network. These features would be sidewalk widening, on-street loading zones, and curb cuts, and on-street safety strategies and contribution to intersection signalization identified in Improvement Measure I-TR-5b and Mitigation Measures M-

TR-2a and M-TR-2b. These features fit within the general types of projects identified above that would not substantially induce automobile travel.<sup>36</sup> Therefore, impacts would be less-than-significant.

Footnotes:

<sup>36</sup> San Francisco Planning Department. Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 901 16th Street and 1200 17th Street, March 4, 2016.

<sup>37</sup> Ibid

<sup>38</sup> Ibid

A new Impact statement, “Impact C-TR-7”, to discuss vehicle miles traveled and induced automobile travel analyses, has been added on page IV.A.72, as follows:

**Impact C-TR-7: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in a considerable contribution to cumulative regional VMT. (Less-than-significant)**

VMT by its very nature is largely a cumulative impact. The amount and distance past, present, and future projects might cause people to drive contribute to the physical secondary environmental impacts associated with VMT. It is likely that no single project by itself would be sufficient in size to prevent the region or state in meeting its VMT reduction goals. Instead, a project’s individual VMT contributes to cumulative VMT impacts. The VMT and induced automobile travel project-level thresholds are based on levels at which new projects are not anticipated to conflict with state and regional long-term greenhouse gas emission reduction targets and statewide VMT per capita reduction targets set in 2020. Therefore, because the proposed project would not exceed the project-level thresholds for VMT and induced automobile travel (Impact TR-10), the proposed project would not be considered to result in a cumulatively considerable contribution to VMT impacts.

Furthermore, as described above, projected 2040 average daily VMT per capita is 4.0 for the transportation analysis zone the project site is located in, 651. This is 75 percent below the projected 2040 regional average daily VMT per capita of 16.1. Projected 2040 average daily VMT per retail employee is 10.7 for the transportation analysis zone 651. This is 27 percent below the projected 2040 regional average daily VMT per retail employee of 14.6.<sup>58</sup>

Footnotes:

<sup>58</sup> San Francisco Planning Department. Eligibility Checklist: CEQA Section 21099 – Modernization of Transportation Analysis for 901 16th Street and 1200 17th Street, March 4, 2016.

## **Text Changes to Other CEQA Issues – Chapter V**

### *Areas of Known Controversy and Issues to be Resolved*

The following paragraph has been added after the first paragraph on page V.4 and a new footnote has been added to that page, as follows:



A complete Transportation Impact Study was prepared and is available for review at the Planning Department as part of Case File No. 2011.1300E. Section IV.A, Transportation and Circulation presents the results of the traffic analysis. If not specified below, the above concerns were addressed in this analysis.

An additional issue is the local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, as they relate to the proposed project and this EIR. On September 27, 2013, Governor Brown signed SB 743, which became effective on January 1, 2014. As noted in the Draft EIR on page IV.2, Public Resources Code Section 21099 requires that the State Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the “reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses.” The statute provides that, upon certification and adoption of the revised CEQA Guidelines by the Secretary of the Natural Resources Agency, “automobile delay, as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment.” In other words, LOS or any other automobile delay metric more generally shall not be used as a significance threshold under CEQA.

Since publication of the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project Draft EIR (Draft EIR) on August 12, 2015, the California Office of Planning and Research (OPR) published for public review and comment a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (“proposed transportation impact guidelines”) in January 2016.<sup>64</sup> OPR’s proposed transportation impact guidelines recommends that transportation impacts can be best measured using an alternative metric known as vehicle miles traveled (VMT). VMT measures the amount and distance that a project might cause people to drive, accounting for the number of passengers within a vehicle.

OPR’s proposed transportation impact guidelines provides substantial evidence that VMT is an appropriate standard to use in analyzing transportation impacts to protect environmental quality and a better indicator of greenhouse gas, air quality, and energy impacts than automobile delay. Acknowledging this, San Francisco Planning Commission Resolution 19579, adopted on March 3, 2016:

- Found that automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall no longer be considered a significant impact on the environment pursuant to CEQA, because it does not measure environmental impacts and therefore it does not protect environmental quality.
- Directed the Environmental Review Officer to remove automobile delay as a factor in determining significant impacts pursuant to CEQA for all guidelines, criteria, and list of exemptions, and to update the Transportation Impact Analysis Guidelines for Environmental Review and Categorical Exemptions from CEQA to reflect this change.
- Directed the Environmental Planning Division and Environmental Review Officer to replace automobile delay with VMT criteria which promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land

uses; and consistent with proposed and forthcoming changes to the CEQA Guidelines by OPR.

Planning Commission Resolution 19579 became effective immediately for all projects that have not received a CEQA determination and all projects that have previously received CEQA determinations, but require additional environmental analysis.

The Draft EIR included analysis pertaining to the automobile delay effects of this proposed project and did not include impact analysis pertaining to VMT and induced demand. Because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA. Draft EIR Section IV.A has been modified to include VMT and an induced automobile travel impact analysis. In other words, because the timing of preparation of this EIR has coincided with the shift from automobile delay to VMT under the Planning Commission's resolution, this EIR considers traffic impacts of the proposed project under both metrics.

As discussed above, consistent with local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, San Francisco has adopted VMT criteria in place of automobile delay criteria and induced automobile travel impact analysis is provided in Section IV.A, Transportation and Circulation.

Footnote:

<sup>64</sup> This document is available online at: [https://www.opr.ca.gov/s\\_sb743.php](https://www.opr.ca.gov/s_sb743.php).

## **Text Changes to Alternatives – Chapter VI**

### *VI. Alternatives*

The following revisions are made to the text on page VI.2, as follows:

#### **Transportation and Circulation**

As noted in Chapter IV.A, Transportation and Circulation, the proposed project is subject to Planning Commission Resolution 19579, which eliminates consideration of impacts related to the topics of automobile delay in determining significance of physical environmental effects under CEQA for all projects where San Francisco is the lead agency. The Draft EIR included analysis pertaining to the automobile delay effects of this proposed project and did not include impact analysis pertaining to VMT and induced demand. Because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA. Draft EIR Section IV.A has been modified to include VMT and an induced automobile travel impact analysis.

*No Project Alternative*

The following revisions are made to the text on page VI.5, as follows:

**Transportation and Circulation Impacts**

The VMT per efficiency metric would be the same under this alternative as under the proposed project. Existing circulation patterns within and in the vicinity of the site would continue under the No Project Alternative. Unlike the proposed project, under the No Project Alternative there would be no changes to traffic, transit, pedestrian, bicycle, loading, emergency vehicle access, or parking conditions compared to existing conditions. Therefore, compared to the proposed project, which would have significant unavoidable project impacts at three study intersections, significant unavoidable cumulative impacts at four study intersections, and less-than-significant VMT, transit, pedestrian, bicycle, loading, emergency vehicle access, parking and transportation-related construction impacts, the No Project Alternative would not result in any impacts related to transportation and circulation. Parking conditions within and in the vicinity of the proposed project would also not change. The proposed alterations to the existing pedestrian circulation pattern, including the proposed mid-block pedestrian alley along the west side of the development, would not occur under this alternative.

*Reduced Density Alternative*

The following sub-heading and paragraph are added after the third paragraph on page VI.18, as follows:

*Vehicle Miles Traveled/Induced Automobile Travel*

Average daily VMT per capita is based on the transportation analysis zone in which the project site is located. The VMT per efficiency metric would be the same under this alternative as under the proposed project and impacts related to VMT and induced automobile travel would remain less than significant.

The second paragraph under impact summary on page VI.19 is revised, as follows:

The Reduced Density Alternative would, under Existing Plus Project conditions, reduce the number of significantly-impacted intersections from three to one (at Mariposa Street and Pennsylvania Street), and under Cumulative Conditions, reduce the number of significantly-impacted intersections from four to two (7th/16th/Mississippi Street, and Mariposa Street and Pennsylvania Street). The Reduced Density Alternative would have the same or similar less than significant impacts in relation to VMT and other transportation and circulation topics as the proposed project.

*Metal Shed Reuse Alternative*

The following sub-heading and paragraph are added after the Parking sub-section on page VI.31, at the top of page VI.232, as follows:

*Vehicle Miles Traveled/Induced Automobile Travel*

Average daily VMT per capita is based on the transportation analysis zone in which the project site is located. The VMT per efficiency metric would be the same under this alternative as under

the proposed project and impacts related to VMT and induced automobile travel would remain less than significant.

The second paragraph under impact summary on page VI.32 is revised, as follows:

VMT and other transportation and circulation topics would remain less than significant and traffic-related impacts would not differ between the proposed project and the Metal Shed Reuse Alternative.

*Environmentally Superior Alternative*

The following revisions are made to the second paragraph on page VI.33, as follows:

CEQA requires selection of the “environmentally superior alternative other than the no project alternative” from among the proposed project and the other alternatives evaluated. The Reduced Density Alternative is identified as the environmentally superior alternative in regards to traffic impacts (i.e., automobile delay) because it would to some extent meet the project sponsor’s basic objectives, while avoiding traffic-related significant unavoidable impacts of the proposed project at two of the four intersections (one of which could be mitigated through signalization under either this alternative or the proposed project if full funding is identified). This impact reduction would be achieved because this alternative would have fewer residential units and commercial space at the site compared to the proposed project, and therefore have associated reductions in vehicle traffic compared to the proposed project. There would be no difference between the proposed project and the Reduced Density Alternative with respect to loss of PDR as they both involve removal of all warehouses at the site.

The Metal Shed Reuse Alternative, on the other hand, would not avoid any of the traffic-related (i.e., automobile delay) unavoidable impacts of the proposed project. While the metal shed warehouses at the site would be retained, these have been determined not to qualify as historic resources, and their loss or retention would not change the conclusion that there would be no significant impacts related to the metal shed warehouses. Similarly, while some space would be rehabilitated for PDR uses (about 55,000 square feet for artists’ work and exhibit space), the City has previously adopted a Statement of Overriding Considerations accepting this impact to avoid conflict with plans for growth of the area. Given that the Metal Shed Reuse Alternative would rehabilitate some PDR uses and if automobile delay were no longer considered an environmental impact, then the Metal Shed Reuse Alternative would be considered the environmentally superior alternative. ~~Finally, However, note that~~ by producing a substantially-smaller number of residential units and less retail space, the Metal Shed Reuse Alternative would achieve the project sponsor’s objectives to a lesser degree. ~~For these reasons, the Metal Shed Reuse Alternative was not chosen as the Environmentally Superior Alternative.~~

*Table VI-8: Comparison of Proposed Project and Project Alternatives Impacts*

The same revisions that were made to Table S-4, starting on page S.24, has been made to Table VI-8, starting on page VI.34, as described above.

### III. List of Persons Commenting

**Table RTC-1: Comments on the Draft EIR**

COMMENTER	DATE	COMMENT TOPICS <sup>1</sup>
<b>Agency Comments (written via letter or email)</b>		
Wolfram, Andrew, Historic Planning Commission, Letter	9/21/2015	CP-2, AL-2, GC-5
Maurice, Patricia, California Department of Transportation (Caltrans), Letter	9/24/2015	TR-1, TR-9, TR-17, TR-18, TR-20
<b>Planning Commissioner Comments at the Planning Commission Hearing (verbal)</b>		
Commissioner Antonini, San Francisco Planning Commission, Transcript	10/1/2015	PO-2, TR-14, TR-17, CP-1, LU-1, GC-7
Commissioner Richards, San Francisco Planning Commission, Transcript	10/1/2015	TR-13, TR-14, CP-1, AL-3, LU-1, GC-2, GC-3
Commissioner Johnson, San Francisco Planning Commission, Transcript	10/1/2015	TR-17, CP-1, AL-3, LU-1
Commissioner Moore, San Francisco Planning Commission, Transcript	10/1/2015	TR-1, CP-1, AL-4, AL-6, LU-1, RE-1
<b>Public Individual and Organizations Comments (written via letter or email)</b>		
Minott, Rod, E-mail	8/19/2015	AL-1
Miller, Ruth, E-mail	8/22/2015	AL-1
Gavre, Yvonne, Letter	9/5/2015	TR-12, TR-16, AL-2, GC-2
Boyd, David, E-mail	9/7/2015	TR-11, TR-13, TR-14, TR-17, AL-2, GC-1, GC-2
Goldenberg, David, E-mail	9/11/2015	TR-1, TR-16, AL-2, AL-3, GC-1, GC-2, GC-3, GC-6
Heath, Alison, E-mail	9/11/2015	ES-1
Laurain, Janet, Adams Broadwell Joseph & Cardozo, E-mail	9/11/2015	GC-2, GC-3
Anasovich, Philip, E-mail	9/12/2015	TR-1, TR-5, TR-13, CP-1, AL-1, AL-2, AL-4, UT-1, GC-1
Loomis, John, E-mail	9/12/2015	AL-2
Eslick, Susan, Letter	9/14/2015	GC-2, GC-7
Hinshaw, Caroline, E-mail	9/13/2015	TR-1, TR-11
Iaconi, Mara, E-mail	9/13/2015	TR-10, TR-11, TR-17, AL-4, NO-1, GC-2
Minott, Rod, E-mail	9/15/2015	GC-4
Rudolfi, Peter, E-mail	9/15/2015	TR-16, CP-1, AL-2, AE-1

COMMENTS	DATE	COMMENT TOPICS <sup>1</sup>
Bogiages, Jean, E-mail	9/17/2015	PH-1, GC-2, GC-7
Hutson, Richard, Letter	9/17/2015	TR-10, TR-11, AL-2, UT-1, AE-1, GC-1, GC-2, GC-3
Anding, Nancy, E-mail	9/18/2015	PO-2, TR-13, AL-2, RE-1
Wilkins, Jim, E-mail	9/24/2015	GC-6
Glicken, Sarah, E-mail	9/25/2015	PO-2, ES-1, TR-12, CP-1, CP-2, AL-4, PH-2, RE-1, HZ-1, GC-2
Engel, Rebekah, Ermico Enterprises, Inc., E-mail	9/28/2015	ES-1, TR-10, TR-14, AL-2
Gee, Gigi, E-mail	9/28/2015	TR-10, TR-11, TR-14
Gilson, Frank, Letter	10/1/2015	AE-1, GC-2, GC-7
Yerba Buena Neighborhood Association, Letter	10/1/2015	PO-2, TR-10, AL-4, AL-5
Bellerby, Dean, E-mail	10/2/2015	AL-2
Kurash, Ron and Lynka Adams, E-mail	10/2/2015	ES-1, TR-13, TR-14, AL-2, AE-1, GC-2
Musse, Jani, Email and Videos	10/2/2015	TR-2, TR-11, AL-4, GC-1
Baron, Bonnie, E-mail	10/3/2015	PO-1, TR-1, TR-5, TR-13, CP-1, AL-1, GC-1
Delacorte, Peter, E-mail	10/3/2015	TR-1, TR-10, TR-11, AL-2, AE-1, GC-1, GC-2
Loomis, John, E-mail	10/3/2015	PO-2, ES-1, TR-1, AL-1, AL-2, AL-4, GC-1, GC-2, GC-3
Meakin, Rita, E-mail	10/3/2015	TR-11, TR-14, GC-2, GC-3
Mize, Scott, E-mail	10/3/2015	GC-6
Sundell, Carol, E-mail	10/3/2015	PO-2, TR-11, TR-14, AL-2
Adams, Lynka, E-mail	10/4/2015	TR-11, TR-14, TR-19, AL-2, GC-1, GC-2, GC-3
Cpuc, Jci, E-mail	10/4/2015	TR-2, TR-8, TR-12, TR-13, TR-15, TR-22, AL-2, NO-2, NO-3, HZ-1, HZ-2, GC-8
Farey-Jones, Lucy, E-mail	10/4/2015	TR-10, TR-11, GC-1, GC-2, GC-3
Firpo, Janine, E-mail	10/4/2015	PO-1, TR-1, TR-11, AL-4, RE-1, GC-6
Friedman, Holly, E-mail	10/4/2015	TR-9, AL-2, AL-4, LU-1
Guney, Ergin, E-mail	10/4/2015	TR-, TR-14, CP-1, AL-2, AL-3, GC-2
Roberts, Kent, E-mail	10/4/2015	CP-2, AL-2, LU-1, GC-2, GC-3
Anasovich, Philip, E-mail	10/5/2015	TR-13, TR-17, CP-2, AL-2, GC-1

COMMENTS	DATE	COMMENT TOPICS <sup>1</sup>
Agor, Vicente, E-mail	10/5/2015	TR-1, TR-2, TR-4, TR-13, TR-17, TR-18, AL-2
Angeli-Morse, Audra, The Parkside, Dino & Luigi Presents, E-mail	10/5/2015	TR-11, TR-14, AL-2, LU-1
Angles, Sean, E-mail	10/5/2015	PO-, ES-1, TR-7, TR-11, TR-13, TR-14, TR-22, AL-2, AL-4, LU-1, AQ-1, AQ-2, RE-1, HZ-1, GC-2, GC-6
Dangles, Robert, E-mail	10/5/2015	ES-1, TR-7, TR-13, TR-17, AL-2, AE-1, GC-1, GC-2, GC-6
Fermin, Gennie, E-mail	10/5/2015	TR-2, TR-10, TR-11, GC-1
Gemignani, Michael, Paragon Frames, E-mail	10/5/2015	TR-11, CP-1, AL-2, LU-1, GC-1
Gordon, Roberta, E-mail	10/5/2015	GC-2, GC-7
Heath, Alison, E-mail	10/5/2015	PO-1, PO-2, ES-1, TR-1, TR-13, TR-14, AL-1, AL-2, AL-3, AL-6, LU-1, NO-3, AQ-1, AQ-2, RE-1, RE-2, HZ-1, AE-2, GC-1
Hill, MG, E-mail	10/5/2015	TR-11, TR-18, AL-2, AQ-2, NO-1
Hong, Dennis, E-mail	10/5/2015	TR-9, TR-23, AQ-1, RE-1, AE-1, GC-2, GC-7
Hotacsu, Ayse, Friends of Jackson Park, E-mail	10/5/2015	RE-1
Horton, Michelle, E-mail	10/5/2015	TR-2, TR-10, TR-11, TR-14, TR-16, CP-1, AL-2, GC-1
Huie, Bruce, Dogpatch Now, E-mail	10/5/2015	PO-2, TR-11, RE-1, GC-2
Kiernat, Carolyn, Page & Turnbull, Letter	10/5/2015	CP-1, CP-2, GC-2
Leerkamp, Chris, E-mail	10/5/2015	TR-10, TR-11, AE-1, AE-2, GC-1
Linenthal, Peter, Potrero Hill Archives Project, E-mail	10/5/2015	CP-1, AL-2, AL-4
Meroz, Yoram, Letter	10/5/2015	ES-1, TR-12, TR-20, TR-21, CP-1, AL-2
Miller, Ruth, E-mail	10/5/2015	PO-2, TR-11, TR-14, TR-15, TR-17, CP-1, AL-2, AL-4, PH-1, AQ-2, GC-1
Minott, Rod, Save the Hill, Letter	10/5/2015	PO-1, PO-2, ES-1, TR-1, TR-4, TR-6, TR-10, TR-13, TR-14, TR-17, TR-18, CP-1, CP-2, AL-1, AL-2, AL-3, AL-4, LU-1, NO-1, AQ-1, AQ-2, RE-1, GE-1, HZ-1, AE-2, GC-1, GC-2, GC-6
Nicholson, Jane, E-mail	10/5/2015	TR-1, TR-4, TR-10, TR-11, TR-13, AL-2, AL-4, GC-1, GC-2, GC-3

COMMENTS	DATE	COMMENT TOPICS <sup>1</sup>
Orton, Eddie, Orton Development, Inc., Letter	10/5/2015	CP-1, GC-2
Owen, Kathleen, Bottom of the Hill, E-mail	10/5/2015	ES-1, TR-10, TR-11, TR-14
Petrin, Katherine, Katherine Petrin Consulting, Letter	10/5/2015	CP-1, AL-2
Pfeffer Agor, Mike, E-mail	10/5/2015	PO-2, ES-1, TR-14, AL-2, LU-1
Smails, Arcadia, Letter	10/5/2015	PO-2, CP-2, AL-2, AL-3, LU-1, GC-2, GC-3
Wilson, Ralph, E-mail	10/5/2015	CP-1, AL-2
Wurtman, David, Letter	undated	TR-13, TR-14, TR-16, CP-1, AL-2, AE-1, GC-1
Zebroski, Chet, Erickson Zebroski Design Group, Inc., E-mail	10/6/2015	TR-1, TR-11, TR-14, AL-2
<b>Public Individual and Organizations Comments at the Planning Commission Hearing (verbal)</b>		
Taskett, Jim, Transcript	10/1/2015	PO-2, TR-1, GC-1, GC-2
Petrin, Katherine, Transcript	10/1/2015	CP-1, AL-2
Butler, Joseph, Transcript	10/1/2015	CP-1, AL-2
Woods, Corrine, Transcript	10/1/2015	ES-1, GC-2
Cornellio, Cathe, Transcript	10/1/2015	AE-1, GC-2
Hatter, Edward, Transcript	10/1/2015	TR-11, RE-1, GC-2
Linenthal, Peter, Transcript	10/1/2015	CP-1, AL-2, AL-4
Meroz, Yoram, Transcript	10/1/2015	ES-1, TR-11, TR-14, AL-2, RE-1
Zeidman, Lester, Transcript	10/1/2015	GC-2
Gurney, Ergin, Transcript	10/1/2015	TR-14, TR-15, AL-2, AL-3
Minott, Rod, Transcript	10/1/2015	AL-2, GC-1, GC-6
Heath, Alison, Transcript	10/1/2015	ES-1, AL-1, AL-2, LU-1
Dwyer, Richard, Transcript	10/1/2015	TR-11, TR-15, AE-1
Audra (no last name given), Transcript	10/1/2015	TR-14, AL-2, LU-1, AE-1
Miller, Ruth, Transcript	10/1/2015	TR-1, TR-13, TR-14, CP-1, AL-2, AL-4, LU-1
Boyd, David, Transcript	10/1/2015	TR-9, TR-17, AL-2, GC-1
No Name Given 1, Transcript	10/1/2015	TR-10, TR-11, AL-2, GC-1
Agor, Vicente, Transcript	10/1/2015	TR-1, TR-2, TR-4, TR-13, TR-17, AL-2
Anasovich, Philip, Transcript	10/1/2015	AL-4, AE-1
Musse, Jani, Transcript	10/1/2015	RE-13, TR-14, TR-15, AE-1
Carpinelli, Janet, Transcript	10/1/2015	GC-2
Boss, Joe, Transcript	10/1/2015	ES-1, TR-13, AL-4



<sup>1</sup> Comment topics abbreviations are:

Plans and Policies (PO)  
Environmental Setting and Impacts (ES)  
Transportation and Circulation (TR)  
Historic Architectural Resources (CP)  
Alternatives (AL)  
Land Use and Planning (LU)  
Population and Housing (PH)  
Noise (NO)  
Air Quality (AQ)  
Recreation (RE)  
Utilities and Service Systems (UT)  
Geology and Soils (GE)  
Hazards and Hazardous Materials (HZ)  
Aesthetics (AE)  
General Comments (GC)

## IV. Comments and Responses

This section provides the verbatim text of the substantive comments received on the Draft Environmental Impact Report (Draft EIR), and the lead agency responses to those comments. This section is organized by environmental subject area, and follows the same order of topics presented in the Draft EIR (by section), followed by topics that were addressed in the Community Plan Exemption (CPE) Checklist. General comments on the EIR not related to substantive environmental issues are grouped together and addressed at the end of this section. The outline of the comments and responses is shown below, with the environmental subject area abbreviations indicated in parentheses:

- A. Plans and Policies (PO)
- B. Environmental Setting and Impacts (ES)
- C. Transportation and Circulation (TR)
- D. Historic Architectural Resources (CP)
- E. Alternatives (AL)
- F. Land Use and Planning (LU)
- G. Population and Housing (PH)
- H. Noise (NO)
- I. Air Quality (AQ)
- J. Recreation (RE)
- K. Utilities and Service Systems (UT)
- J. Geology and Soils (GE)
- L. Hazards and Hazardous Materials (HZ)
- M. Aesthetics (AE)
- N. General Comments (GC)

Within each environmental topic, similar comments are grouped together beneath a heading that introduces the subject of the comments. Comments are transcribed verbatim, though minor typographical errors may have been corrected. After each comment, the name of the commenter, their organization (if applicable), type of comment (letter, e-mail, or public hearing transcript), and date of comment are shown in italics. Attachments A and B present the comment letters and hearing transcript in their entirety, respectively. Table RTC-1 in the previous section additionally lists all the comment topics within each letter.

Following each comment or group of comments, a comprehensive response is provided to address issues raised in the comment(s), and to clarify or augment information in the Draft EIR, as appropriate.

In cases where a comment addresses more than one topic, the response may provide a cross-reference to other comment responses. Response numbers correspond to the comment numbers; for example, the response to comment topic AL-1 is referred to as Response AL-1.

## A. PLANS AND POLICIES

The comments and corresponding responses in this section cover topics in Section III, Plans and Policies, of the Draft EIR. These include topics related to:

- Comment PO-1: Height
- Comment PO-2: Policy Inconsistency

### **Comment PO-1: Height**

As proposed, the developers project will be 72-82 feet high. The Eastern Neighborhoods Plan considered heights between 45-59 feet. The DEIR ignores this discrepancy. (*Baron, Bonnie, E-mail, October 03, 2015*)

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Heights should be capped at 48 feet along 17th Street and 58 feet along 16th. If added height is required for a mechanical/stairway penthouse on the northeast 16th Street corner of the proposed project then this additional height should be capped at 68 feet. (*Firpo, Janine, E-mail, October 04, 2015*)

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The *Eastern Neighborhoods PEIR* did anticipate that overall height and scale would increase “somewhat” but that implementation of design guidelines would ensure compatibility with “existing development as well as pedestrian-orientation, and articulation and appropriate massing of buildings”. However the relevant PEIR analysis was done before the project site was rezoned in 2011, from 40 to 68 feet. The impacts of the project of this height and scale were not studied in the PEIR, nor was its compliance with the Urban Design Element considered. The DEIR for this project fails to consider these additional impacts. (*Heath, Alison, E-mail, October 05, 2015*)

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As proposed, the developer’s project (72 ft. – 83 ft. / 395 housing units) would be one of the largest, densest building developments in Potrero Hill history. Yet City Planning’s previous environmental studies and projections for Potrero Hill fail to take into account a project of this scope at this site – including its impacts. Official environmental analysis currently on record in the Eastern Neighborhoods Plan considered heights of between 45 feet - 50 feet at the property, not 72 feet to 82 feet. The DEIR fails to address this discrepancy.

Evidence that the density and height have been adequately or properly evaluated in prior environmental review by the City during the Eastern Neighborhoods EIR process (including Comments and Responses) remains deficient. City Planning recently issued a community plan exemption stating the project was in compliance with development density. But this simply isn’t accurate.

The project remains inconsistent with many policies and principles of the Potrero Hill Area Plan. The final Eastern Neighborhood’s EIR does address heights rising 65 feet to 68 feet -- but only on the north side of 16th Street (not the south side of 16th) — which is consistent with Showplace Square/Potrero Hill Area Plan policy calling for lowered heights on the south side of 16th Street.

All of the height maps and analysis in the Draft Eastern Neighborhoods EIR for Options A, B, and C reflected heights for the 901 16th / 1200-1210 17th Street site at between 45 feet and 50 feet (the Comments & Responses cites Option B as most closely resembling the “Preferred Project” choice). Moreover, this 45’ to 50’ height and density were affirmed, codified and called for in the final Showplace Square/Potrero Hill. Objective 3.1/Policies 3.1.1 & 3.1.2 state: Adopt heights that respect, “the residential character of Potrero Hill.” “Respect the natural topography of Potrero Hill.... Lowering heights from the north to the south side of 16th Street would help accentuate Potrero Hill.”

The Comments & Responses in the Eastern Neighborhoods EIR document cited a map showing that frontages along 16th Street had been raised to 65 feet in comparison to Option B. Yet the analysis emphasized that the added height would remain on the north side of 16th Street (Showplace Square) and not the south side (Potrero Hill). As stated in “Changes by Neighborhood — Showplace Square/Potrero Hill” page C&R 12: “No changes in height limits are proposed on Potrero Hill. The Preferred Project would establish height limits of 65 - 68 feet within the core of Showplace Square between US-101 and I-280, north of 16th and south of Bryant Streets.” This is repeated on page C&R-21: “In Showplace Square/Potrero Hill plan area, height limits would be similar to those analyzed for Options B, with minor height increases (to 45 feet as opposed to 40 feet in the DEIR) proposed to areas north of Mariposa Street, between De Haro Street and Seventh/Pennsylvania Streets. Height limits in the established residential areas of Potrero Hill would remain unchanged at 40 feet. The Preferred Project establishes heights of 65-68 feet within the core of Showplace Square between U.S. 101 and I-280, north of 16th and south of Bryant Streets.”

Again, this north/south 16th Street divide is consistent with policy spelled out in the final Showplace Square/Potrero Hill Area Plan. The increased heights (48 ft. - 68 ft.) for the site were proposed as a zoning amendment late in the game by April of 2008. But again this wasn’t reflected in the final Eastern Neighborhoods EIR, which did not properly evaluate or anticipate the density and height specific to the Corovan site. The final Eastern Neighborhoods EIR did not consider, evaluate or anticipate a project of the size, height or density proposed by Walden Development and Prado Group at this specific location. In fact, as stated above, all of the completed analyses anticipated a height on the Corovan parcel of between 45 feet and 50 feet. Moreover, responses to comments in the final EN EIR did not address or analyze issues raised about heights or zoning at 901 16th/1200 - 1210 17th Streets. As stated on C&R page 147: “A number of comments were directed at the proposed rezoning and area plans, and do not address the adequacy or accuracy of the EIR. Because these comments do not address the adequacy or accuracy of the EIR, no responses are required.”

For all of the above reasons, Save The Hill respectfully believes the final Eastern Neighborhoods EIR and the DEIR for 901 16th / 1200 17th Street remain inadequate. Height and density at the Corovan site were not properly evaluated and data remains inconsistent with prior environmental review. Consequently, the current EIR for the Corovan site should remedy this and address and evaluate height and density as a significant impact within the “Land Use / Planning” category.

... Significant Impacts On Visual Environment / Inconsistent With Area Plan. As noted above, the scale, height, and density of the proposed project (68 feet to 83 feet and 395 residential units) remain inconsistent with numerous terms set out in the Showplace / Potrero Hill Area Plan. Prior study contained in the Eastern Neighborhoods Environmental Impact Report, produced and relied upon by City Planning for all new development, is now eight-years old and did not properly and adequately evaluate, analyze, consider or anticipate a project of the size, height, or density proposed by the developer at the Corovan location. In fact, all of the analyses completed for the Eastern Neighborhoods anticipated a height on the Corovan parcel of 45 feet to 50 feet – not up to 83 feet as proposed by the developer.

The developer's drawings indicate 72' to 83' high mechanical/stair/elevator penthouses that push the building heights well above the 68' height limit. These penthouses only serve to enable private views via access to amenity rooftop decks for high-paying building tenants. They should not be credited as legitimate open space. The developer's proposed project and penthouses will also contribute to obscuring a cherished landmark of Potrero Hill – scenic public views of downtown San Francisco. This conflicts with long-standing city and state policies regarding protection of public scenic vistas. The developer's project remains inconsistent with multiple Area Plan principles including provisions to "respect the natural topography of Potrero Hill", to lower building "heights from the north to south side of 16th Street", and to "promote preservation of other buildings and features that provide continuity with past development." (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

### **Response PO-1**

These comments relate to the height of the project and assert that the proposed height is inconsistent with heights for the site under the Eastern Neighborhoods Plan. The proposed project is consistent with applicable height regulations adopted as part of the Eastern Neighborhoods Plan. Pursuant to the Eastern Neighborhoods Rezoning and Area Plans as approved on January 19, 2009, and in order to implement Showplace Square/Potrero Area Plan Objective 3.1 and Policies 3.1.1 and 3.1.2, the height and bulk limit of the project site was re-designated from 40-X and 50-X to the 68-X and 48-X height and bulk districts that allow maximum building heights of 68 feet along 16th Street and 48 feet on 17th Street. These height limits were shown in Figure C&R-2 of the *Eastern Neighborhoods Final PEIR*, including 68-foot designations along 16th Street in the Preferred Project.

On August 7, 2008, the Planning Commission certified the *Eastern Neighborhoods PEIR* by Motion 17659 and adopted the Preferred Project for final recommendation to the Board of Supervisors. The findings for adoption of the *PEIR* in this motion specified that changes since the *Draft PEIR* would not require recirculation of the document pursuant to CEQA Guidelines Section 15088.5 and the *Eastern Neighborhoods Final PEIR* was certified as complete in compliance with CEQA for the Preferred Project as described in the *Eastern Neighborhoods Final PEIR*.<sup>10</sup>

The environmental analysis for this proposed project conducted project-specific studies that are affected by height in the CPE Checklist (Wind and Shadow on pages 42 through 48; Aesthetics as a non-CEQA issue on page 24) and the Draft EIR included a discussion of visual conditions and views and visual simulations for informational purposes (pages II.26 through II.36). Height and density are not necessarily one and the same because a project could potentially still have the same amount of density, even if heights were lower, through increased site coverage and/or smaller units. Therefore, the cumulative impacts associated with population growth were also covered in the *Eastern Neighborhoods PEIR*.

On July 21, 2011 the Planning Commission took further action to amend the Zoning Map and make numerous technical corrections, including rezoning the 47-square-foot parcel (Block 3949 Lot 001A) within the project site from MUR to UMU and increasing the height limit of that parcel from 40 feet to 68 feet, consistent with the zoning and height limit of surrounding properties. The different heights for 16<sup>th</sup> and 17<sup>th</sup> streets reflect the intent to reduce height limits south of the 16<sup>th</sup> Street corridor.

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<sup>10</sup> San Francisco Planning Department. San Francisco Planning Commission Motion 17659, August 7, 2008. Available online at: <http://notice.sfpplanning.org/2015-006512PPA.pdf>.

Planning Code provisions for height limits measurement acknowledge that certain rooftop equipment and screening and architectural elements are exempt from height limits and project above the stated height limit, as permitted by Planning Code Section 260(b). The proposed project is consistent with height limits, including provision of exempt rooftop elements, and is not requesting any special approvals or variances related to height.

**Comment PO-2: Policy Inconsistency**

The neighborhood master plan, which many of us worked tirelessly on, specifically calls for new development to address the topography of the hill and the density and character of the showplace square zoning district. The current proposal does not successfully meet this Planning Dept requirement. (*Anding, Nancy, E-mail, September 18, 2015*)

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The problems with the DEIR include:...2) Inadequate & Inaccurate Study of Land Use (And Planning Policies Ignored) (*Glicken, Sarah, E-mail, September 25, 2015*)

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Yet again the Department staff is preparing to recommend an almost 100% housing development in an Eastern Neighborhood's UMU District that was and is supposedly intended for mixed-use developments that maintain PDR uses in particular. (*Yerba Buena Neighborhood Association, Letter, October 01, 2015*)

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- The principle of promoting "preservation of other buildings and features that provide continuity with past development" is not being followed.
  - Preserving and respecting neighborhood character as stated in the Potrero Hill Area Plan and City General Plan has been ignored. (*Loomis, John, E-mail, October 03, 2015*)
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Please do not ignore the many rules that were in place about height, preservation and the word complement the existing buildings in the eastern neighborhood plan. (*Sundell, Carol, E-mail, October 03, 2015*)

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Erroneous study assumptions and violations of the Showplace / Potrero Hill Area Plan must be corrected before any application to the proposed project.

... Conclusions in the Draft EIR conflict with the Showplace Square/Potrero Area Plan and General Plan by disregarding policies of preserving neighborhood character and protecting parks and open space from shadowing.

... LAND USE OBJECTIVES IGNORED: The UMU (Urban Mixed Use) zoning for this project does not honor the Showplace Square/Potrero Hill Plan's Objective 6.1 to "support the economic well being of a variety of businesses". This new proposal for housing will result in the displacement of current tenant

Corovan jobs, many of them viable PDR and blue-collar jobs. Most of the development's square footage will be devoted solely to residential use. The extent of the cumulative loss of PDR space was not fully anticipated in the Eastern Neighborhoods' FEIR (Final EIR) and merits further study. (*Angles, Sean, E-mail, October 05, 2015*)

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My overarching concerns include inaccurate cumulative impact assumptions, the project's incompatibility with the objectives of several established land use plans, and the loss of PDR.

...Section V of the DEIR concludes that "in general" the proposed project is consistent with policies in "relevant planning documents". In fact, the project is inconsistent with multiple objectives of several applicable plans and will have a substantial impact on the existing character of the vicinity and land use particularly in the context of cumulative development at levels that were not anticipated in the *Eastern Neighborhoods PEIR*.

Specifically, the proposed project conflicts with the Showplace Square/Potrero Area Plan, Urban Design Element, Housing Element and General Plan by disregarding policies of preserving neighborhood scale and character, providing adequate infrastructure, preserving PDR uses and protecting parks and open space from shadowing.

The project is incompatible with the existing neighborhood character and thus conflicts with the Housing Element. Objective 11 of the Housing Element states that development must "support and respect the diverse and distinct character of San Francisco's Neighborhoods" and "ensure that growth is accommodated without substantially and adversely impacting neighborhood character."

The proposed project would overwhelm the prevailing scale of development, merging four separate parcels into two covering an unprecedentedly large 3.5- acre complex over two blocks. This would result in the largest footprint of any development anywhere on Potrero Hill outside of Potrero Terrace. The large massing would be entirely out of context with the neighborhood's traditional diversity of ownership, use and appearance that comes with smaller parcels. The Urban Design Element requires that, "the scale of each new building must be related to the prevailing height and bulk in the area... Designs for buildings on large sites have the most widespread effects and require the greatest attention."

...The Showplace Square / Potrero Hill Plan Policy 3.1.6, states that, "new buildings should epitomize the best in contemporary architecture, but should do so with a full awareness of, and respect for, the height, mass, articulation and materials of the best of the older buildings that surrounds them" As proposed, the project fails to match the height, mass, and articulation of older existing buildings in the vicinity and provides little awareness of surrounding structures or any sense of authenticity. The DEIR inaccurately claims the project would not conflict with Objective 1.2 to maximize development potential in keeping with neighborhood character. More specifically the project fails to follow POLICY 1.2.1, which ensures "that in-fill housing development is compatible with its surroundings."

The UMU (Urban Mixed Use) zoning for this project does not adequately honor the Showplace Square/Potrero Hill Plan's Objective 6.1 to "support the economic well being of a variety of businesses". This project would eliminate 109,500 square feet of PDR building space and displace a number of PDR and blue collar jobs.

The project conflicts with two key objectives in the General Plan by failing to respect the existing neighborhood character. Furthermore, access to sunlight at Daggett Park would be impacted with shadowing from the project, and public vistas will be compromised:

- “That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods.”
- “That our parks and open space and their access to sunlight and visual vistas be protected from development.”

Finally the project is not consistent with Planning Code as the project sponsor is requesting six exemptions and waivers. The project would require a Large Project Authorization, a Rear Yard Exemption and Horizontal Mass Waiver as well as exemptions to loading requirements. (*Heath, Alison, E-mail, October 05, 2015*)

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The plans for the Corovan site (395 units of housing + more than 24,000 square feet of retail) are in line with the current state of activity along 16th Street near 7th Street with 1000 Potrero at Daggett Triangle. This has set the pace and direction for future development in the area - including a public green space onsite to the project. (*Huie, Bruce, Dogpatch Now, E-mail, October 05, 2015*)

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The developer’s proposal conflicts with the City General Plan policies to preserve and respect neighborhood character and to protect public vistas, and it threatens to completely overwhelm an already overburdened infrastructure. To permit a project of this scale and this density at this site would not only disregard multiple area plan principles to lower heights on the south side of 16th street, but it would also recklessly disregard infrastructural needs that we know all too well do not accompany such proposals. (*Miller, Ruth, E-mail, October 05, 2015*)

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The proposed project conflicts with Priority Policy 7 of the San Francisco General Plan:

That landmarks and historic buildings be preserved.

The project sponsor plans to demolish culturally significant industrial buildings erected by the Pacific Rolling Mill between 1908 and 1926. Policy 3.1.9 of the Showplace / Potrero Hill Area Plan, under Objective 3.1, states: “Preserve notable landmarks and areas of historic, architectural or aesthetic value, and promote the preservation of other buildings and features that provide continuity with past development.” As outlined above, the proposed project demonstrates a complete lack of “continuity” with past development in Potrero Hill by introducing large-scale Mission Bay type development into the neighborhood and by destroying existing buildings of historic and cultural value that currently stand on the proposed site. The DEIR remains deficient on addressing and remedying this.

... The developer’s project violates multiple Area Plan principles including provisions to “respect the natural topography of Potrero Hill”, to lower building “heights from the north to south side of 16th Street”,



and to "promote preservation of other buildings and features that provide continuity with past development." The DEIR fails to adequately address these issues.

...The DEIR remains inadequate and inaccurate because it fails to consider that the proposed project conflicts with the Showplace Square / Potrero Area Plan, and the Urban Design and Housing Elements of the City's General Plan by disregarding policies of preserving neighborhood scale and character, providing adequate infrastructure, and preserving PDR uses. Both the Corovan development project and the DEIR fail to address the following consistency issues:

A. Objective 3 of the San Francisco General Plan's Urban Design Element:

"Moderation of major new development to complement the city pattern, the resources to be conserved, and the neighborhood environment."

The scale and density of the Prado/Walden project are substantially greater than existing surrounding land uses and the project would be inconsistent with the established land use character of the neighborhood. The DEIR fails to acknowledge and consider that the Daggett Triangle development at 1000 16th Street in Showplace Square, as well as other large developments in nearby Mission Bay, are in separate and distinct neighborhoods that are not part of the Corovan site in Potrero Hill.

B. Objectives of the Showplace Square / Potrero Area Plan

The Prado/Walden project conflicts with a number of Area Plan objectives including Objective 1.2, which promotes development in keeping with neighborhood character. This project is inconsistent with the established neighborhood character of Potrero Hill. The Showplace Square/Potrero Hill Area Plan, in Policy 3.1.6, states that, "new buildings should epitomize the best in contemporary architecture, but should do so with a full awareness of, and respect for, the height, mass, articulation and materials of the best of the older buildings that surrounds them." As proposed, the project fails to match the height, mass, and articulation of existing buildings in the Potrero Hill vicinity and provides little awareness of surrounding structures.

C. Policy 2 of the City's General Plan: "That existing housing and neighborhood character be conserved and protected in order to preserve the cultural and economic diversity of our neighborhoods."

The Prado/Walden project is not consistent with this policy because scale, mass, bulk and height are inconsistent with and will negatively impact established neighborhood development pattern and character. The proposed development is dramatically out of scale with nearby residences and small businesses.

For the DEIR to fulfill its purpose, it must include updated data reflecting neighborhood growth and it must acknowledge Area Plan principles developed and accepted by the community. Among other things, the cumulative loss of PDR to the City has not been accurately addressed and evaluated in the DEIR, and we ask that this study be conducted. Since the extent of the cumulative loss of PDR space was not fully anticipated in the 2008 Eastern Neighborhoods' Environmental Impact Report and no mitigations were identified, these impacts require further study in the EIR for this project. Analysis should include a full exploration of feasible mitigations such as the inclusion of new low impact PDR space onsite.

We ask that the DEIR adequately address, analyze, and mitigate the aforementioned growth and planning policies and consider an alternate to the developer's proposal so as to honor these considerations.

Moreover, the DEIR fails to acknowledge and consider that the south side of 16th Street in this area remains part of Potrero Hill and not Showplace Square or Mission Bay, which are separate and distinct neighborhoods. Showplace Square's 1000 16th Street (Daggett Triangle) project is neither appropriate for or consistent with the character of Potrero Hill. This fact is clearly established in City planning policy and principle and should be respected and complied with. This issue should be addressed by City Planning in a final EIR.

... As noted above, the scale, height, and density of the proposed project (68 feet to 83 feet and 395 residential units) remain inconsistent with numerous terms set out in the Showplace / Potrero Hill Area Plan.

...The developer's proposed project and penthouses will also contribute to obscuring a cherished landmark of Potrero Hill – scenic public views of downtown San Francisco. This conflicts with long-standing city and state policies regarding protection of public scenic vistas. The developer's project remains inconsistent with multiple Area Plan principles including provisions to "respect the natural topography of Potrero Hill", to lower building "heights from the north to south side of 16th Street", and to "promote preservation of other buildings and features that provide continuity with past development."

... Inconsistent with Showplace / Potrero Hill Area Plan On Respecting Public View Corridors. "Respect Public View Corridors", Policy 3.1.5 of the Showplace Square/Potrero Hill Area Plan states: "San Francisco's natural topography provides important way finding queues for residents and visitors alike, and views towards the hills or the bay enable all users to orient themselves vis-à-vis natural landmarks. Further, the city's striking location between the ocean and the bay, and on either side of the ridgeline running down the peninsula, remains one of its defining characteristics and should be celebrated by the city's built form."

By proposing a single massive structure at the base of Potrero Hill the developers completely ignore the natural environment surrounding the site. The height, bulk, and mass, of their project will undermine (and in some cases destroy) Potrero Hill's visual integration with downtown. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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The Showplace/Potrero Hill Area Plan, was a document developed by neighborhood residents over a period of years and accepted into San Francisco's official zoning guidelines for our neighborhood. The developer's project violates multiple Area Plan principles including provisions to "respect the natural topography of Potrero Hill," to lower building "heights from the north to south side of 16th Street", and to "promote preservation of other buildings and features that provide continuity with past development."

Unlike the surrounding neighborhoods like the Mission or Mission Bay, which are relatively flat, Potrero Hill is a hill – its natural topography - populated with single family homes, not large dense complexes. Clearly, a large complex at the bottom of Potrero Hill does not allow for lower building heights and "provide continuity with past development" and the DEIR fails to address this violation of the Area Plan. (*Pfeffer Agor, Mike, E-mail, October 05, 2015*)

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In Policy 3.1.6, The Showplace Square/Potrero Hill Area Plan states: "new buildings should epitomize the best in contemporary architecture, but should do so with a full awareness of, and respect for, the height,

mass, articulation and materials of the best of the older buildings that surrounds them.” Key to this statement is the establishment of “older buildings” as the called-upon point of reference in the design and construction of new developments in our community. In contrast to this principle, the developer’s current proposal for the Corovan Project clearly looks to Mission Bay (a distinct and very new neighborhood with its own specific purpose) and north to the brand new Daggett Triangle development as a guide to its architecture. City Planning should recognize this failure and should put even more emphasis on the Metal Shed Reuse Alternative as a means to correct it. (*Smails, Arcadia, Letter, October 05, 2015*)

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I’ve participated with many of the Eastern Neighborhood planning meetings, and I believe this project is in alignment with many of the project guidelines and goals. (*Taskett, Jim, Transcript, October 1, 2015*)

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Also, it was clear on the zoning, and there is a UMU zone, and as we talked about earlier tonight when we talked about the whole eastern neighborhood zoning, there were delineations of areas that were more reserved for PDR use and other areas were designated UMU which were more appropriate for other uses, and there is no existing active PDR on the site. (*Commissioner Antonini, San Francisco Planning Commission, Transcript, October 1, 2015*)

### **Response PO-2**

These comments are related to perceived inconsistencies with applicable plans and/or policies, including the objectives of the Eastern Neighborhoods Plan and requirements of the UMU zone. As described in Section I, Introduction, on page 1.5 of the Draft EIR, as part of the consideration of the proposed project’s eligibility for streamlined review under the Eastern Neighborhood PEIR, the Citywide Planning and Current Planning Divisions of the Planning Department determined that the proposed project is consistent with the zoning controls and the provisions of the Planning Code applicable to the project site. The 2009 rezoning of the site to the UMU use district, which does not require the retention of PDR uses (see Response LU-1 for additional discussion of PDR in the UMU district), and the 48-X and 68-X height and bulk districts occurred at the same time as the adoption of the objectives and policies of the Eastern Neighborhoods Plan, such that the City determined at that time that projects consistent with the UMU zoning and applicable height and bulk districts would be generally consistent with those objectives and policies. See Section III, Plans and Policies, in the Draft EIR for a discussion of the project’s general consistency with the San Francisco General Plan, including the Showplace Square/Potrero Area Plan.

The project seeks six exceptions from specific Planning Code requirements, as permitted by Planning Code Section 329, and as described on pages III.7 to III.9 of the Draft EIR. As noted on page 25 of the CPE Checklist, the Citywide Planning and Current Planning Divisions of the Planning Department have determined that the proposed project is permitted in the UMU District and is consistent with the development density as envisioned in the Showplace Square / Potrero Area Plan.

Additionally, as described in Section III, Plans and Policies, on page III.1 of the Draft EIR, project-related policy conflicts and inconsistencies do not constitute, in and of themselves, significant environmental impacts. The consistency of the proposed project with plans, policies, and regulations that do not relate to physical environmental issues or result in physical environmental effects (e.g., aesthetics) will be considered by City decision-makers as part of their determination on whether to approve, modify, or disapprove the proposed project. Therefore, other than when addressed under other topics (including

Responses PO-1 related to building heights, CP-1 and CP-2 related to historic buildings, AL-4 related to the definition of “mixed-use,” LU-1 regarding loss of PDR, RE-2 regarding shadowing of parks, AE-1 regarding project architecture, AE-2 regarding views, and GC-1 regarding the size/density of the project), comments related to policy inconsistency do not address the adequacy or accuracy of the EIR, and this response is provided for information purposes only. In regards to the loss of PDR, note that the *Eastern Neighborhoods PEIR* determined that adoption of the Eastern Neighborhoods Area Plans would result in a significant and unavoidable impact on land use due to the cumulative loss of PDR. The CPE Checklist prepared for the proposed project also acknowledged that the loss of the existing PDR space would contribute considerably to the significant cumulative land use impact related to loss of PDR uses that was identified in the *Eastern Neighborhoods PEIR*.

Some comments also pertain to the adequacy of the analysis under the Eastern Neighborhoods Plan, including cumulative assumptions and infrastructure. These comments are further addressed in Response ES-1.

**B. ENVIRONMENTAL SETTING AND IMPACTS**

The comments and corresponding responses in this section cover topics in Section IV, Environmental Setting and Impacts, of the Draft EIR. These include topics related to:

- Comment ES-1: Adequacy and Reliance of the *Eastern Neighborhoods PEIR* Projections and Cumulative Analysis, Including Infrastructure

**Comment ES-1: Adequacy and Reliance of the *Eastern Neighborhoods PEIR* Projections and Cumulative Analysis, Including Infrastructure**

Page V.1 of the DEIR cites an approximate 3266 residential units completed or planned in the Showplace Square / Potrero Hill Area as of July 2015. The Eastern Neighborhoods PEIR studied the increase of dwelling units throughout the lifetime of the Plan. If you reference Table 35 from the PEIR, you will note that up to 3891 units were anticipated between 2000 and 2025. In analyzing the recent study used by Planning to calculate the total of 3266 for the DEIR, we discovered that all the projects completed between 2000 and 2008 appear to have been omitted. We estimate that there were an additional 900 units constructed in the SS/PH Area during this time, bringing the actual total well over the 3891 projection in the ENP PEIR. We would encourage the Planning Department to include a 2000-2008 analysis in the study so that we can all get an accurate understanding of where we are in terms of maxing out the Pipeline.

We do expect to bring this point up to the Commission next week but I thought you would appreciate a heads up. (*Heath, Alison, E-mail, September 11, 2015*)

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It's imperative that the city look at the cumulative impact of the proposal building in Potrero Hill neighborhood before accepting this project. (*Glicken, Sarah, E-mail, September 25, 2015*)

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I am writing to share some of my concerns about the proposed plan for this site. There seems to be several inadequate and inaccurate analysis of the area in many areas. I own and run a business located in this immediate area and I already see a huge impact on the area in regards to traffic and parking with the development of Mission Bay. (*Engel, Rebekah, Ermico Enterprises, Inc., E-mail, September 28, 2015*)

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I feel that the goals for the neighborhood laid out in the Eastern Neighborhoods Plan many years ago, were supported by data that no longer holds up if you look at the conditions in light of what really exists in 2015. New studies should and must be conducted to update the outdated ones.

... I urge you to consider all of the affects on our neighborhood before issuing yet another permit for a project that cannot be tolerated in this part of the city. (*Kurash, Ron and Lynka Adams, E-mail, October 02, 2015*)

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- The recent analysis that Potrero Hill / Showplace Square has already far exceeded the number of housing units planned and projected for 2025 is not taken into consideration.
- Planning continues to rely on “stale” data from the eight year old EN EIR to justify limited environmental review of sites like Corovan. (*Loomis, John, E-mail, October 03, 2015*)

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I urge the Planning Department to order a ‘time out’ halt to this current proposal and all future projects in the Eastern Neighborhoods Potrero/Showplace Square areas until the cumulative negative impacts that are already underway and deteriorating our neighborhood’s quality of life caused by current projects and construction-in-progress are assessed and mitigated.

The draft Environmental Impact Report appears incomplete, insufficient and inadequate due to obsolete studies and false facts.

... DENSITY. The proposed project is too big for the project site and surrounding Potrero Hill neighborhood. With the onslaught of new projects already under construction, the cumulative effects of too much housing development without delivery of a single neighborhood benefit promised the Eastern Neighborhoods Plan adopted 2008 is unacceptable to our community. Erroneous study assumptions and violations of the Showplace / Potrero Hill Area Plan must be corrected before any application to the proposed project.

... OBSOLETE STUDIES: The Planning Department is relying on the Eastern Neighborhoods Final EIR that is eight years old and is now stale for the environmental review of the current proposal for housing. Some of the studies and research rely on data that is as old as the 2000 census.

... CUMULATIVE IMPACTS IGNORED: The issue of cumulative impact has been dismissed entirely and misrepresents the projections made in the Eastern Neighborhoods Final EIR. The fact is that the City already has more units in the pipeline for Showplace Square/Potrero area than were anticipated to be built in the area by 2025. Furthermore, the City has failed to fund the promised infrastructure improvements to support growth. The assumption that cumulative impacts will be limited is no longer true.

RECREATION NEGATIVE IMPACTS: Recreation impacts are not fully addressed. The addition of new residential households would result in an increased demand on Jackson Playground. The Draft EIR relies on outdated projections and doesn't account for cumulative impacts. It points to onsite public and private open space to fulfill recreation needs for residents. (*Angles, Sean, E-mail, October 05, 2015*)

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In conclusion, I urge the Planning Department to do a few things:

(1) Read the Eastern Neighborhood Plans adopted December 2008. Recognize that the Planning Department has already far exceeded the projected residential units projected by 2025, and therefore halt approval of this massive housing project until the promised infrastructure and neighbor benefits have caught up to serve the new housing already constructed. (*Dangles, Robert, E-mail, October 05, 2015*)

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My overarching concerns include inaccurate cumulative impact assumptions, the project's incompatibility with the objectives of several established land use plans, and the loss of PDR.

... Section V of the DEIR concludes that "in general" the proposed project is consistent with policies in "relevant planning documents". In fact, the project is inconsistent with multiple objectives of several applicable plans and will have a substantial impact on the existing character of the vicinity and land use particularly in the context of cumulative development at levels that were not anticipated in the *Eastern Neighborhoods PEIR*.

...The Eastern Neighborhoods Plan promised, "A full array of public benefits, to ensure the development of complete neighborhoods, including open space, improved public transit, transportation, streetscape improvements, community facilities, and affordable housing." Unfortunately the City has failed to provide most of the necessary infrastructure to support actual development, particularly in the context of unanticipated cumulative growth. The San Francisco Housing Element requires that infrastructure needs be planned and coordinated to accommodate new development. Objective 12 states that the City must "balance housing growth with adequate infrastructure that serves the city's growing population".

...The DEIR relies on a document (*Eastern Neighborhoods PEIR*) that is eight years old and is now stale. Given the unanticipated level of development in the Showplace Square/Potrero Hill Area, the assumption that cumulative impacts were addressed is no longer true. As a result, the DEIR is deeply flawed.

The fact is that the City already has more units constructed and in the pipeline for Showplace Square/Potrero Area than were anticipated to be built in the area by 2025. In 2008, the Board of Supervisors approved a Preferred Project level of 3180 residential units in Showplace Square and Potrero Hill. The baseline condition identified consistently throughout the *Eastern Neighborhoods PEIR* is for the year 2000 while the date of the Notice of Preparation establishes the "existing conditions" beginning in 2005, consistent with CEQA Statute 15125. Depending on which starting point is used, the number of units constructed and in the pipeline is between 3841 and 4005 units, well over the Preferred Project level of 3180.

Despite the fact that the City has already dramatically exceeded the 2025 projections for Potrero Hill and Showplace Square, the CPE and DEIR dismiss this entirely and contain a number of errors and contradictions.

Page 27 of the CPE checklist erroneously states that, "The proposed project's 395 residential units would be within the amount of housing development anticipated in the Eastern Neighborhoods EIR. These direct effects of the proposed project on population and housing are within the scope of the population growth anticipated under the Eastern Neighborhoods Rezoning and Area Plans and evaluated in the Eastern Neighborhoods EIR."

Page I.5 of the DEIR correctly notes the Preferred Project total of 3180 residential units, while Page IV.5 ignores the Preferred Project total and references Options A, B, and C from the ENP EIR analysis with a range from 2,300 to 3,900 units. Planning did an analysis for the DEIR showing that 3,266 units were completed or in the pipeline as of July 2015. We were able to obtain the list of projects and discovered that everything prior to 2008 was omitted despite the 2000 baseline and the "existing conditions" established with the NOP publication in 2005. Additionally two projects, 1000 Mississippi Street with 28 units and 1001 – 17th Street with 48 units were omitted from the list. This amounts to hundreds of units. What follows is an apples to oranges comparison of housing projections beginning in 2000 (options A, B and C) to actual construction and pipeline counts beginning in 2008.

The third paragraph on Page I.5 claims that even though the residential land use category is approaching projected levels, we haven't maxed out on non-residential uses. The impacts of overall growth across all types of land use are what matters, rather than just residential uses. The assertion that the Eastern Neighborhoods Plan didn't analyze the impacts of individual land uses in isolation, and that we should combine residential and commercial uses, without regard to the imbalances and varying impacts between the two is absurd.

An adequate CEQA analysis of cumulative impacts will look at "past, present, and reasonably foreseeable future projects". Reviewing individual projects in a void, without honest consideration of the rampant development that is actually taking place is in conflict with CEQA requirements. This is particularly applicable to population and housing impacts. In combination with unanticipated development in Potrero Hill and Showplace Square, as well as nearby Mission Bay and the Central Waterfront, this project will undoubtedly "induce substantial population growth" in the area and demands additional study.

... Page 50 of the CPE Checklist states that, "The *Eastern Neighborhoods PEIR* determined that the anticipated increase in population would not result in a significant impact to public services, including fire protection, police protection, and public schools. No mitigation measures were identified in the PEIR." As the ENP PEIR projections for cumulative impacts are no longer accurate, further study is required.

... Page 58 states that, "Implementation of the proposed project would not result in either project-level or cumulative significant impacts that were not identified in the *Eastern Neighborhoods PEIR* related to listed hazardous materials sites." Since the PEIR doesn't accurately project cumulative growth for the Showplace Square/Potrero Hill Area, this assumption is ungrounded. New analysis must be done to account for past, present and reasonably foreseeable future projects. (*Heath, Alison, E-mail, October 05, 2015*)

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For estimating cumulative impacts of the project within the context of the ENP, this DEIR refers to the ENP EIR. For that traffic study, traffic was measured at several selected intersections throughout the area, and the effects of additional construction on these intersections were estimated.

The map attached here [*see full letter for attached map*], taken from the ENP EIR (p. 271) shows the studied intersections as black open squares and circles. I have placed green circles at the locations of several large developments in the planning and construction pipeline (1 Henry Adams; 1301 16th St.; 1601 Mariposa; 88 Arkansas; Daggett Triangle), and marked the project considered here as a gray rectangle. All of these projects will serve for of vehicular trips to/from the Mariposa 280 onramp/offramp, and for vehicular trips from the Vermont St. 101 offramp. I have shown on the map paths of possible circulation between these projects and the freeways, marked in red. As may be seen, these potential paths cross few of the study intersections, and therefore the impacts of this additional traffic has not been estimated adequately, and it is not known whether they need to be can be or mitigated.

A letter from the Mayor's office to the UCSF Chancellor's office, sent 2/20/2015 (<http://tinyurl.com/lee-ucsf-warriors>), mentions "prioritization of Mariposa St. over Owens and 16th" as a way of mitigating traffic impacts from the Warriors project. In effect the letter acknowledges that 16th St. may be reaching its full planning capacity, and offers Mariposa as an alternate route. Even without such planning, it is natural for drivers to seek less congested routes, and there is a risk of traffic spilling from 16th St. into the unstudied 17th and Mariposa Streets, among others.



The cumulative traffic impact study in the ENP EIR does not include these streets at all, and cannot be considered adequate for cumulative impacts of this project or others in the area. (*Meroz, Yoram, Letter, October 05, 2015*)

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After reviewing the draft EIR I have a number of comments, detailed below, regarding its adequacy and accuracy in evaluating significant potential impacts, both peculiar to this proposed project and cumulative, that were not covered or assumed by both the DEIR and the underlying Eastern Neighborhoods EIR and should be included in the final EIR for consideration and full analysis.

...As proposed, the developer's project (72 ft. – 83 ft. / 395 housing units) would be one of the largest, densest building developments in Potrero Hill history. Yet City Planning's previous environmental studies and projections for Potrero Hill fail to take into account a project of this scope at this site – including its impacts.

...Evidence that the density and height have been adequately or properly evaluated in prior environmental review by the City during the Eastern Neighborhoods EIR process (including Comments and Responses) remains deficient. City Planning recently issued a community plan exemption stating the project was in compliance with development density. But this simply isn't accurate.

...For all of the above reasons, Save The Hill respectfully believes the final Eastern Neighborhoods EIR and the DEIR for 901 16th / 1200 17th Street remain inadequate. Height and density at the Corovan site were not properly evaluated and data remains inconsistent with prior environmental review. Consequently, the current EIR for the Corovan site should remedy this and address and evaluate height and density as a significant impact within the "Land Use / Planning" category.

...The DEIR remains inadequate and inaccurate because it fails to consider that the proposed project conflicts with the Showplace Square / Potrero Area Plan, and the Urban Design and Housing Elements of the City's General Plan by disregarding policies of preserving neighborhood scale and character, providing adequate infrastructure, and preserving PDR uses.

... Recent analysis shows the Potrero Hill / Showplace Square area has already exceeded the number of housing units and population growth the City planned and projected for 2025. The City approved the Eastern Neighbors Plan assuming up to 3,181 housing units would be built by 2025 in the Potrero Hill / Showplace Square area. But as of 2015, close to 4,000 units were already in the pipeline or built. The City failed to anticipate the dramatic pace of development and has not delivered on its promise to provide necessary public improvements (parks, transit, roads, etc.) to support thousands of new residents. City Planning analysis understates the "cumulative impacts" of large developments on our community by continuing to rely on outdated data from the 2008 Eastern Neighborhoods Environmental Impact Report to inform analysis in the EIRs of large projects, including the proposed Corovan development. Assumptions and mitigation measures provided in that document are simply no longer valid.

More recent and relevant data to account for the extraordinary changes in this area's density should be included in the DEIR. In order for the DEIR to be constructive for the neighborhood and for the City, it must incorporate new and accurate population and housing data, and it must acknowledge the degree to which public improvements lag behind the neighborhood's growth. City Planning needs to acknowledge that Potrero Hill has already exceeded development targets projected for 2025. Environmental study and

mitigations should reflect this fact to help inform current and future planning. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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I am not anti-development by any means and I do realize that the city has a housing shortage, but I feel that this is too much too fast and that our beloved neighborhood should have a stronger infrastructure in place before these projects can be built. (*Owen, Kathleen, Bottom of the Hill, E-mail, October 05, 2015*)

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One of my biggest concerns with the Draft EIR is that it relies on outdated reports and data and in doing so, does not take a holistic view of development in Potrero Hill. (*Pfeffer Agor, Mike, E-mail, October 05, 2015*)

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Not related to this, but I do serve on the Eastern Neighborhood CAC, and one of our biggest frustrations is when we started out with a pot of money, so to speak, you know, projected how much money, we also started out with a board of supervisors' mandated priority projects. So we started out about halfway down with the money that was going to come in. Those priority projects were not necessarily to ease the current or then traffic deals. They were predicated on who had good friends in City Hall to say, "Well, yeah, this should be turned into a one-way; this should be a transit-only lane." I appreciate how that happens, because it's been happening for years. But the reality is we have not -- impact fees don't get close to covering the impacts. Secondly, we're faced with, let's say, an administration that sees an endless source of funds from general tax and do not particularly devote any of them to the existing problems that we have. So we passed bond issues. There needs to be a whole overhaul. And I really respect you guys or gals for taking this one on. (*Boss, Joe, Transcript, October 1, 2015*)

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We've been talking about the maxed out residential pipeline, and have expressed our concerns that the Draft EIR analysis for this project Misrepresents development projections... Meanwhile, the City keeps moving the goal post on cumulative impacts without providing the infrastructure and benefits promised us in the Eastern Neighborhood's plan. (*Heath, Alison, Transcript, October 1, 2015*)

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My first comment about the EIR, which it will be reiterated briefly, some comments that they made earlier about the -- about cumulative impacts is planned for in the area of planning -- I believe that cumulative impacts are -- as measured in the area EIR are inadequate. (*Meroz, Yoram, Transcript, October 1, 2015*)

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...the significant and unavoidable problems of traffic and transportation. The problem is that they aren't caused by this project; they are caused by a deficit that our neighborhood inherited. The Eastern Neighborhood's plan really -- I mean, if you've seen the triangle, you can see we're kind of reeling with the amount of development that's been going on in the neighborhood. The cumulative impacts are not adequately funded by the impact fees. They can't be. And the City has to make a commitment to improvements in traffic circulation, transportation, all of these things that -- it's not any one project. This

project sponsor is willing to go beyond a fair-share contribution to mitigate some of these impacts, and I think that's fairly helpful. But it isn't anymore -- any one project is not going to be able to solve the problems that we're going to be seeing. (*Woods, Corrine, Transcript, October 1, 2015*)

### **Response ES-1**

These comments generally question the DEIR's reliance on the Eastern Neighborhoods Rezoning and Area Plans (Eastern Neighborhoods Plan) and the *Eastern Neighborhoods PEIR* (Case No, 2004.0160E; State Clearinghouse No. 2005032048). Commenters raise several points regarding this topic. Some commenters express concerns that the growth anticipated under the *Eastern Neighborhoods PEIR* has already been achieved and that the analysis in the Draft EIR relies upon what some commenters believe to be outdated environmental data and analysis (in terms of existing and future conditions, including traffic, nearby and planned land uses, population, density, public services, and infrastructure issues that are perceived by a number of commenters to substantially differ from the assumptions made in the *Eastern Neighborhoods PEIR*). Specifically, some commenters believe that the data relied upon in the *Eastern Neighborhoods PEIR* is outdated, is no longer valid, and that an EIR should be prepared for the project that does not rely on this program level EIR and Planning document.

These topics are separated into the four following subheadings, Reliance on the *Eastern Neighborhoods PEIR* as a Program EIR, Eastern Neighborhoods Dates for Baseline and Existing Conditions, Adequacy and Relevance of Cumulative Analysis, and Infrastructure Improvements within the Eastern Neighborhoods Plan area. Response PO-1, PO-2, and LU-1 further discuss consistency with plans and policies and loss of PDR.

#### *Reliance of the Eastern Neighborhoods PEIR as a Program EIR*

The proposed project's relationship to the Eastern Neighborhoods/Showplace Square/Potrero Area Plan and the *Eastern Neighborhoods PEIR* is detailed on pages IV.5 through IV.7 of the Draft EIR and on page 23 of the CPE Checklist included as Appendix A to the Draft EIR. As discussed there, the *Eastern Neighborhoods PEIR* is a comprehensive environmental programmatic document that identifies the potential environmental impacts associated with the type and intensity of development that is projected to occur under the area plans, including the Showplace Square/Potrero Area Plan, and within the plan area boundaries, including the project site boundaries, over an approximate 20-year timeframe.

According to CEQA Guidelines Section 15168, a program EIR:

... is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) geographically; (2) as logical parts in the chain of contemplated actions; (3) in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or (4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

Use of a program EIR can provide the following advantages: (1) provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action; (2) ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis; (3) avoid duplicative reconsideration of basic policy considerations; (4) allow the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts; and (5) allow reduction in paperwork.

Subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.

As stated on page 23 of the CPE Checklist, the process for environmental review of the proposed project is consistent with CEQA Guidelines Section 15183, which provides an exemption from environmental review for projects that are consistent with the development density established by the zoning, community plan or general plan policies for which an EIR was certified, except as might be necessary to examine whether there are project-specific effects which are peculiar to the project or its site. Further, CEQA Guidelines Section 15183 specifies that examination of environmental effects shall be limited to those effects that:

- a) are peculiar to the project or parcel on which the project would be located;
- b) were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent;
- c) are potentially significant off-site and cumulative impacts which were not discussed in the underlying EIR; and
- d) are previously identified in the EIR, but which are determined to have a more severe adverse impact than that discussed in the underlying EIR.

Individual development projects, like the proposed project, that would be implemented under the Eastern Neighborhoods Plan are required to undergo project-level environmental review to determine if they would result in additional impacts specific to the development proposal, the project site, and if the proposed development would be within the development projections and the 20-year timeframe that the *Eastern Neighborhoods PEIR* analyzes, so as to assess whether additional environmental review is required. As discussed on pages III.1 through III.12 of the Draft EIR, the proposed project was determined to be consistent with the Showplace Square/Potrero Area Plan, the UMU zoning controls, and the provisions of the Planning Code applicable to the project site. Specifically, the proposed project would be in conformance with the height, uses, and density planned for the site as described in the *Eastern Neighborhoods PEIR*. As discussed below under *Adequacy and Relevance of Cumulative Analysis*, the proposed project is within the development projections and the approximate 20-year timeframe analyzed by the *Eastern Neighborhoods PEIR*.

A CPE checklist was prepared for the project to assess the potential for site-specific or project-specific significant impacts, which determined that most of the environmental impacts that would occur as a result of the proposed project were adequately anticipated, analyzed, and mitigated in the *Eastern Neighborhoods PEIR*. This determination is supported by the analysis provided in the CPE Checklist in Appendix A of the Draft EIR. The background analysis conducted for the proposed project determined that the proposed project would require additional environmental review because it could result in potentially significant impacts that were not discussed in the underlying *Eastern Neighborhoods PEIR* (CEQA Guidelines Section 15183(c)) under the topic areas of Cultural Resources and Transportation and Circulation and would therefore require additional analysis in an EIR.

In general, a program EIR is effective for the entire planning horizon identified in the associated plan, unless conditions substantially change such that the information or analysis provided in the EIR is no longer valid. In this case, the *Eastern Neighborhoods PEIR* evaluated the impacts of development in the Plan Area that could occur through the year 2025. As discussed on pages IV.5 through IV.7 of the Draft EIR, the

approach to the cumulative impact analysis in the Draft EIR relies on the environmental analysis in the *Eastern Neighborhoods PEIR*, when appropriate.

Some comments state that the *Eastern Neighborhoods PEIR* data relied upon in the Draft EIR and CPE Checklist is obsolete, stale, and no longer applies to the analysis of existing and future conditions within the Eastern Neighborhoods Plan Area, including at the project site. Because the growth projections up to the year 2025 relied upon in the *Eastern Neighborhoods PEIR* are still accurate and have not been exceeded by developments within the Plan Area (see discussion under next sub-header, Adequacy and Relevance of Cumulative Analysis, below for further discussion), the development growth and resulting population growth projections and census data relied upon from the *Eastern Neighborhoods PEIR* are still valid and applicable to the future anticipated increase in development of the project site.

Although, as noted by some commenters, the data relied upon in the Draft EIR and CPE Checklist in some cases may be up to 10 years old, its age does not necessarily make it invalid for use in the Draft EIR and CPE Checklist analysis. Where required (such as for the assessment of automobile delay described in more detail below), new data and updated assumptions are relied upon.

As previously stated, because the project is within and would not exceed the development growth projected by the program *Eastern Neighborhoods PEIR*, it is still appropriate to rely upon data and assumptions included in that document.

The analysis of the proposed project either determined the impacts of the project were adequately analyzed and identified in the *Eastern Neighborhoods PEIR*, would not result in new significant impacts due to specifics of the project or site, or identified new impacts and considered project-specific mitigation measures to address these impacts. Reliance on the program *Eastern Neighborhoods PEIR* does not exempt the proposed project from site and project-specific environmental review using the most up to date available information. Rather, it helps to avoid duplicative analysis of impacts that have already been identified as applicable to the proposed project and provides the projected level of area-wide development and associated population increases for cumulative analyses. Therefore, the methodology for analyzing the environmental impacts of the proposed project is valid and is consistent with standard City practice for evaluation of proposed development projects that are located within designated planning areas that are the subject of a program EIR.

#### *Eastern Neighborhoods Dates for Baseline and Existing Conditions*

A comment asserts that the *Eastern Neighborhoods PEIR* consistently identifies the baseline condition as the year 2000 while the date of the Notice of Preparation establishes the “existing conditions” as beginning in 2005. Thus, the comment alleges, that the number of units evaluated in the *Eastern Neighborhoods PEIR* has already been exceeded. The comment further asserts that, depending on which starting point is used, the number of units constructed and in the pipeline is between 3,841 and 4,005 units, well over the Preferred Project level of 3,180. However, the *Eastern Neighborhoods PEIR* evaluated the growth that would be expected to occur as a result of projects that could proceed with the Eastern Neighborhoods Area Plan rezoning approved on December 19, 2008. Note that the residential development that took place between 2005 and 2008 proceeded under the zoning in place at that time, not the rezoning being considered for the Eastern Neighborhoods Area Plan. Those projects underwent their own environmental reviews that did not rely on the *Eastern Neighborhoods PEIR* to analyze and disclosed their impacts. Any projects that occurred between March 9, 2005 (the *Eastern Neighborhoods PEIR* NOP date) and December 19, 2008 (again, when rezoning under the Eastern Neighborhoods Area Plan was adopted) were not and could not have been reliant on the rezoning and/or height changes contemplated by the Eastern Neighborhoods Area

Plan, and accordingly are not counted towards the project-created growth projections in the EIR. Appropriately, any impacts associated with those projects during the 2005-2008 period were not attributed to the Eastern Neighborhoods Rezoning and were not considered or analyzed as impacts of the rezoning in the *Eastern Neighborhoods PEIR*.

#### *Adequacy and Relevance of Cumulative Analysis*

These comments generally relate to the Eastern Neighborhoods Plan Area growth projections that are identified and evaluated in the *Eastern Neighborhoods PEIR* and referred to in the Draft EIR's analysis of cumulative impacts (generally described on pages IV.5 through IV.7 of the Draft EIR). These comments state that growth within the Eastern Neighborhoods and within the Showplace Square/Potrero Hill area in particular, has outpaced the growth projections and level of development evaluated in the *Eastern Neighborhoods PEIR*. Given this assumption, these comments further indicate that the *Eastern Neighborhoods PEIR* can no longer be relied upon for the evaluation of the project-specific and cumulative environmental effects of individual projects occurring within this planning area. Some comments state that the growth projections identified in the *Eastern Neighborhoods PEIR* have been exceeded and, furthermore, necessary infrastructure improvements to address this additional growth have not been considered. These points are individually responded to below.

Some comments make statements about the number of housing units or square footage of development identified in the City's 2014 Third Quarter Pipeline Report, and state that the report indicates that the number of units or square footage of development planned for under the Eastern Neighborhoods Plan has been exceeded. According to the Planning Department's calculations, these statements are incorrect and the number of units planned or constructed since adoption of the *Eastern Neighborhoods PEIR* is within and below the upper end of the range identified and evaluated in the *Eastern Neighborhoods PEIR*. The *Eastern Neighborhoods PEIR* found that implementation of the Eastern Neighborhoods Plan could result in a substantial amount of growth within the Eastern Neighborhoods Plan area, resulting in an increase of approximately 7,400 to 9,900 dwelling units and 3,200,000 to 6,600,000 square feet of non-residential uses (excluding PDR loss) through the lifetime of the Plan (year 2025).<sup>11</sup> The *Eastern Neighborhoods PEIR* projected that this level of development would result in a total population increase of approximately 23,900 to 33,000 people throughout the lifetime of the plan.<sup>12</sup> The growth projected in the *Eastern Neighborhoods PEIR* was based on a soft site analysis (i.e., assumptions regarding the potential for a given site to be developed through the year 2025) and not based upon the created capacity of the rezoning options (i.e., the total potential for development that would be created indefinitely).<sup>13</sup> As of February 23, 2016, projects containing a total of 9,749 dwelling units and 2,807,952 square feet of non-residential space (excluding PDR

<sup>11</sup> Tables 12 through 16 of the *Eastern Neighborhoods PEIR* and Table C&R-2 in the Comments and Responses show projected net growth based on proposed rezoning scenarios. A baseline for existing conditions in the year 2000 was included to provide context for the scenario figures for parcels affected by the rezoning, not projected growth totals from a baseline of the year 2000. Estimates of projected growth were based on parcels that were to be rezoned and did not include parcels that were recently developed (i.e., parcels with projects completed between 2000 and March 2006) or have proposed projects in the pipeline (i.e., projects under construction, projects approved or entitled by the Planning Department, or projects under review by the Planning Department or Department of Building Inspection). Development pipeline figures for each Plan Area were presented separately in Tables 5, 7, 9, and 11 in the PEIR. Environmental impact assessments for these pipeline projects were considered separately from the Eastern Neighborhoods rezoning effort.

<sup>12</sup> Table 2 Forecast Growth by Rezoning Option Chapter IV of the Eastern Neighborhoods Draft EIR shows projected net growth based on proposed rezoning scenarios. A baseline for existing conditions in the year 2000 was included to provide context for the scenario figures for parcels affected by the rezoning.

<sup>13</sup> San Francisco Planning Department, Community Planning in the Eastern Neighborhoods, Rezoning Options Workbook, Draft, February 2003. This document is available at: <http://www.sf-planning.org/index.aspx?page=1678#background>.

loss) have been completed or are planned to complete environmental review<sup>14</sup> within the Eastern Neighborhoods Plan area. This level of development corresponds to an overall population increase of approximately 23,760 to 25,330 persons. These estimates include projects that have completed environmental review (5,647 dwelling units and 1,788,733 square feet of non-residential space) and planned projects, including the proposed project (totaling 4,102 dwelling units and 1,019,219 square feet of non-residential space). Planned projects are those projects that have submitted environmental evaluation applications with the San Francisco Planning Department. Of the 9,749 dwelling units that are under review or have completed environmental review, building permits have been issued<sup>15</sup> for 4,583 dwelling units, or approximately 47 percent of those units (information is not available regarding building permits for non-residential square footage).

In addition, within the Showplace Square/Potrero Hill subarea, the *Eastern Neighborhoods PEIR* estimated that implementation of the Eastern Neighborhoods Plan could result in an increase of approximately 2,300 to 3,900 dwelling units and 1,500,000 to 1,700,000 square feet of non-residential space (excluding PDR loss) through the year 2025. This level of development corresponds to an overall population increase of approximately 7,860 to 9,890 persons. As of February 23, 2016, projects containing approximately 3,315 dwelling units and 1,138,920 square feet of non-residential space (excluding PDR loss) have completed or are planned to complete environmental review within the Showplace Square/Potrero Hill subarea. This level of development corresponds to an overall population increase of approximately 6,910 to 7,760 persons. These estimates include projects that have completed environmental review (2,379 dwelling units and 635,553 square feet of non-residential space) and planned projects that are undergoing environmental review, including the proposed project (936 additional dwelling units and 503,367 square feet of non-residential space).<sup>16</sup> Of the 3,315 dwelling units that are under review or have completed environmental review, building permits have been issued for 1,836 dwelling units, or approximately 55 percent of those units. Therefore, anticipated growth from the Eastern Neighborhoods Rezoning and Area Plans is within the *Eastern Neighborhoods PEIR* growth projections.

Growth that has occurred within the Plan area since adoption of the *Eastern Neighborhoods PEIR* has been planned for and the effects of that growth were anticipated and considered in the *Eastern Neighborhoods PEIR*. Although the reasonably foreseeable growth in the residential land use category is approaching the projections within the *Eastern Neighborhoods PEIR*, the non-residential reasonably foreseeable growth is between approximately 33 and 70 percent of the non-residential projections in the *Eastern Neighborhoods PEIR* (within the range of development analyzed in the *PEIR* noted in the previous paragraph). The *Eastern Neighborhoods PEIR* utilized the growth projections approach for certain environmental impact topics (i.e., Land Use; Population, Housing, Business Activity, and Employment; Transportation; Noise; Air Quality;

<sup>14</sup> For this section, environmental review is defined as projects that have or are relying on the growth projections and analysis in the *Eastern Neighborhoods PEIR* for environmental review (i.e., Community Plan Exemptions or Focused Mitigated Negative Declarations and Focused Environmental Impact Reports with an attached Community Plan Exemption Checklist).

<sup>15</sup> An issued building permit refers to buildings currently under construction or open for occupancy. This number includes all units approved under CEQA (including CPEs, Categorical Exemptions and other types of CEQA documents).

<sup>16</sup> The estimated number of dwelling units reported here is different than the estimated number of dwelling units identified in the San Francisco Planning Department's Pipeline Report, 3rd Quarter 2014 for Showplace Square/Potrero Hill subarea. Reasons for the difference include inadvertent overestimates from the Pipeline Report in the amount of development at particular development sites (e.g., 1000 16th Street and 1 Henry Adams and 801 Brannan Street) and the inclusion of Potrero Hope SF Project. The Potrero Hope SF Project includes 1,094 net new dwelling units; however, this Project is the subject of a stand-alone EIR that does not rely on the growth projections and impacts identified in the *Eastern Neighborhoods PEIR*. That project would establish a Special Use District, would be built in phases over at least a 10-year period, and contains substantial infrastructure over and above that considered in the *Eastern Neighborhoods PEIR*.

Parks, Recreation, and Open Space; Utilities/Public Services; and Water) to analyze the physical environmental impacts associated with that growth. The analysis took into account the overall growth in the Eastern Neighborhoods and did not necessarily analyze in isolation the impacts of growth in one land use category, although each land use category (either residential or nonresidential use categories) may have differing severities of effects. Therefore, given that the growth from the reasonably foreseeable projects has not exceeded the overall growth that was projected in the *Eastern Neighborhoods PEIR*, information that was not known at the time of the *Eastern Neighborhoods PEIR* has not resulted in new significant environmental impacts or substantially more severe adverse impacts than discussed in the *Eastern Neighborhoods PEIR*, other than transportation and circulation, as discussed in the Draft EIR for the proposed project. In conclusion, the proposed project is consistent with and within the growth projections anticipated in the *Eastern Neighborhoods PEIR*. Therefore, the cumulative assumptions provided within the *Eastern Neighborhoods PEIR* are applicable to development of the project site and the Draft EIR (and CPE Checklist) analysis does not rely on outdated information and, as such, makes a reasoned and good faith effort to inform decision-makers and the public about the impacts of the proposed project.

#### *Infrastructure Improvements within the Eastern Neighborhoods Plan Area*

The comments express concerns that development within the Eastern Neighborhoods has outpaced infrastructure improvements needed to support new development and question the adequacy of existing and planned infrastructure improvements within the Eastern Neighborhoods Plan area. Concerns primarily relate to area-wide roadway, transit, utilities, recreation, and open space improvements. Comments also state that the San Francisco Housing Element mandates that infrastructure needs be planned for and coordinated to accommodate new development and that housing growth must be balanced with the provision of adequate infrastructure.

New development within the Eastern Neighborhoods Plan area, including the proposed project are required to pay development impact fees upon issuance of the “first construction document” (either a project’s building permit or the first addendum to a project’s site permit), which are collected to fund approximately 30 percent of the infrastructure improvements planned within the Eastern Neighborhoods Plan area. Additional funding mechanisms for infrastructure improvements are identified through the City’s 10-year Capital Plan. Eighty percent of development impact fees must go towards Eastern Neighborhoods priority projects, including development of a new park in the Showplace Square area (Daggett Park), until those priority projects are fully funded. The fees are dispersed to fund infrastructure improvements within the entirety of the Eastern Neighborhoods Plan area, on a priority basis established by the Eastern Neighborhoods Citizen Advisory Committee (CAC) and the City’s Interagency Plan Implementation Committee (IPIC). The IPIC works with the CAC to prioritize future infrastructure improvements. Additionally, the Planning Department and Capital Planning Program are working with the implementing departments to identify additional State and federal grants, General Fund monies, or other funding mechanisms such as land-secured financing or Infrastructure Finance Districts to fund the remaining emerging needs. Impact fees are distributed among the following improvement categories: open space, transportation and streetscape, community facilities, childcare, library, and program administration. Per the January 2015 Planning Department’s Interagency Plan Implementation Committee Annual Report,<sup>17</sup> the Planning Department forecasts that pipeline projects, including the proposed project, would contribute approximately \$79.6 million in impact fee revenue within the Eastern Neighborhoods Plan area

<sup>17</sup> City and County of San Francisco, Interagency Plan Implementation Committee Annual Report, website: [http://www.sf-planning.org/ftp/files/plans-and-programs/plan-implementation/2011\\_IPIC%20Report\\_FINAL.pdf](http://www.sf-planning.org/ftp/files/plans-and-programs/plan-implementation/2011_IPIC%20Report_FINAL.pdf), January 2015.



between 2016 and 2020. Infrastructure projects that are currently underway are listed in the Planning Department's Interagency Plan Implementation Committee Annual Report. These include various streetscape, roadway, park, and childcare facility improvements. Additionally, the Transportation Sustainability Fee was adopted in November 2015 (BOS File Number 150790). Expenditures are allocated according to Table 411A.6A. in the Ordinance, giving priority to specific projects identified in different Area Plans. These processes and funding mechanisms are intended to provide for implementation of infrastructure improvements to keep pace with development and associated needs of existing and new residents and businesses within the area.

As discussed on pages IV.A.35 through IV.A.37 of the Draft EIR, transit improvements in the project vicinity are also proposed as part of the Muni Forward program independent of the Eastern Neighborhoods infrastructure improvements. In the project vicinity, San Francisco Municipal Transportation Agency (SFMTA) recently upgraded service on the 10 Townsend line, including nighttime service every 30 minutes after 7:30 PM until midnight seven days a week and additional morning trips. As part of Muni Forward, the SFMTA has approved transit priority and pedestrian safety improvements for the 22 Fillmore route along 16th Street, including rerouting service to 16th Street between Kansas Street and Third Street, transit-only lanes, transit bulbs, new traffic and pedestrian signals, and new streetscape amenities. In the interim, the 55 16th Street bus line was established in February 2015 to run along 16th Street between the Mission and 16th Street BART Station and the UCSF campus in Mission Bay. The analysis related to transit impacts is included in the Draft EIR on pages IV.A.45 through IV.A.47 and as discussed in more detail under Response TR-7, concludes that the project would not cause significant increases in capacity utilization on crowded transit lines.

Recreation was addressed in the CPE Checklist (page 49, included as Appendix A of the Draft EIR), which determined that the proposed project would be within the development project in the Eastern Neighborhoods Rezoning and Area Plans. As more fully discussed under Response RE-1, while the proposed project would contribute to increased demands on the open space and recreational facilities, this impact would be less than significant because the proposed project includes on-site public and private open space improvements that would exceed Planning Code requirements, and the increase in use of off-site parks and open space would not be so substantial as to cause or accelerate the physical deterioration of existing facilities or require the construction of new facilities to serve demand generated by the project.

Furthermore, it should be noted that projects that occur within the Eastern Neighborhoods are required to pay development impact fees which further fund needed infrastructure improvements. These requirements are consistent with San Francisco Housing Element policies that require infrastructure needs to be planned for and coordinated with new development (Objective 12). Each project is also required to identify and mitigate (to the extent feasible) any substantial impacts associated with infrastructure deficiencies, such that a significant environmental impact would not result. As discussed above, given that the proposed project is within the growth projections identified in the *Eastern Neighborhoods PEIR* and that the proposed project would contribute required funds towards infrastructure improvements within the Eastern Neighborhoods and other infrastructure improvements such as those under Muni Forward, the proposed project would not be required to individually fund any infrastructure improvements beyond those that would be required to reduce the level of significance of environmental impacts identified for the project in the Draft EIR.

## C. TRANSPORTATION AND CIRCULATION

The comments and corresponding responses in this section cover topics in Section IV.A, Transportation and Circulation, of the Draft EIR. These include topics related to:

- Comment TR-1: Transit Impacts
- Comment TR-2: Bike and Pedestrian Safety
- Comment TR-3: Sidewalk Widening in ROW
- Comment TR-4: Traffic Calming
- Comment TR-5: Alternate Project Driveway Locations
- Comment TR-6: Project Driveway Queuing and Hazards
- Comment TR-7: Traffic Interference with Emergency Bomb Squad
- Comment TR-8: Impact on Truck Route
- Comment TR-9: Construction-Period Traffic Impacts
- Comment TR-10: Parking
- Comment TR-11: Traffic, General
- Comment TR-12: Adequacy of the Traffic Analysis
- Comment TR-13: Traffic, Age of Traffic Data
- Comment TR-14: Traffic, Cumulative Impacts, Other Large Projects in Vicinity
- Comment TR-15: AM Peak Hour and/or Event Traffic Analysis
- Comment TR-16: Traffic/Driveways on Nearby Streets
- Comment TR-17: Traffic Mitigation Feasibility
- Comment TR-18: Mariposa Street/I-280 Southbound On-ramp and the Owens Street Extension
- Comment TR-19: More Traffic Signals
- Comment TR-20: Effectiveness of the TDM Plan
- Comment TR-21: Impact of Proposed Mitigation on Traffic
- Comment TR-22: Train Grade Crossing
- Comment TR-23: Potential I-280 Teardown

**Comment TR-1: Transit Impacts**

We commend the DEIR's identification of Transit Impact Development Fees subject to this project and a discussion of the City's anticipated Transportation Sustainability Program. Given the project's contribution to area traffic and its proximity to I-280 and U.S. Highway 101, the project should contribute a sufficient allocation of fair share contributions toward multi-modal improvements and regional transportation projects. These contributions would be used to lessen future traffic congestion and improve transit in the project vicinity. (*Maurice, Patricia, California Department of Transportation (Caltrans), Letter, September 24, 2015*)

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I ask that any plan for that site which is more than the 3 story traditional SF building density be required to provide additional transit as part of ITS plan. Like making sure they provide adequate sewage, if you won't allow them to provide parking spaces, you should require that they provide adequate transportation. Ducking this issue and just letting the external consequences be borne by the neighborhood is not a sustainable solution. (*Goldenberg, David, E-mail, September 11, 2015*)

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I believe that it is folly to place this resource demanding and congestion creating design on this site. The transportation resources of the City of San Francisco are stretched to the breaking point. There has been very little improvement of public transportation for Potrero Hill in the 30 years that I lived here. (*Anasovich, Philip, E-mail, September 12, 2015*)

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Public transportation to the site is limited to an extension of an already overburdened bus line. (*Baron, Bonnie, E-mail, October 03, 2015*)

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Public transportation on the Hill is laughable, and plans to improve it are hardly auspicious, so people are going to continue to rely on their cars. (*Delacorte, Peter, E-mail, October 03, 2015*)

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- Promises to provide necessary public improvements to support the thousands of new residents. (*Loomis, John, E-mail, October 03, 2015*)

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Prior to finalizing the plans for the proposed building at 1601 Mariposa, I would like to see:

\* A Transit First policy that assures that viable options to deal with the increased traffic flow is in place BEFORE the problems occur. It is not sufficient in my view to have vague references to what will be done. Concrete and achievable measures should be in place, along with adequate funding and planning to ensure they are carried out. (*Firpo, Janine, E-mail, October 04, 2015*)

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One additional issue I'd like to bring up that I wasn't able to include in my verbal comments and that is not too far removed from the traffic density issue is the topic of public transportation, which is one more of the major problems about this project, in my opinion, and is not emphasized enough in the draft report. I don't expect it will be news to any members of the Planning Commission how underserved Potrero Hill is in terms of public transit and has been for a while. The developers behind this project make an appeal to the public transit possibilities when they try to minimize the expected parking space and traffic impact of this complex. That leaves me wondering how the already inadequate level of public transit service in this area will manage to meet the demand for this many more public transit trips, in conjunction with the additional demand to be brought by another multi-hundred-unit residential development project (Daggett Place) already underway right across the street. Unless an explosive growth in the public transportation servicing this area is slated for the near future, I don't see how the public transit expectations of the developer will be met. And I hope I can be forgiven for being doubtful that any such explosive transit growth is being planned. *(Guney, Ergin, E-mail, October 04, 2015)*

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A dense development at the Corovan site would limit parking spots for its residents to foster pedestrian, bicycle and public transportation. That is a wonderful green and sustainable concept... If we are adding hundreds of residents to our neighborhood with the idea that they will use bicycles or public transit, then shouldn't pedestrian safety and transit options be in place before we begin building new developments? *(Agor, Vicente, E-mail, October 05, 2015)*

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Adding thousands of residents with little investment in transit will be a disaster for the neighborhood, resulting in further dependence on cars while traffic continues to get worse. A Transit First policy should put transit first and ensure that viable options be in place before we experience significant population growth. New studies of existing conditions and new analysis of cumulative conditions, not anticipated in the ENP FEIR, must now be done.

By relying on traffic and MUNI studies that were conducted three years ago, when there was markedly less traffic and demand for transit, the existing conditions studied in the DKS study are no longer accurate.

...The City has failed to provide the transit improvements promised in the Showplace Square/Potrero Hill Area Plan. As a result, lines such as the 10 are already running near capacity at rush hour. New analysis, using actual existing conditions, and projecting accurate cumulative impacts must be completed. *(Heath, Alison, E-mail, October 05, 2015)*

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Adding thousands of residents with little investment in public transit will be a disaster for the neighborhood, resulting in further dependence on cars while traffic congestion grows and degrades our quality of life. The DEIR claims no mitigation measures are needed yet the 10 Townsend bus is already at 95% capacity!! Public transportation to the site is limited to a single future bus line that is already overburdened, underfunded, and suffering maintenance and scheduling difficulties.

Let's please have a Transit First policy where transit is put in first to ensure that viable options are in place before we experience significant population growth. Since the Eastern Neighborhoods EIR and the Corovan DEIR do not adequately address transit, new studies of existing and cumulative conditions

should happen first. City Planning should conduct additional traffic studies that are more current and robust and consider traffic calming measures. *(Nicholson, Jane, E-mail, October 05, 2015)*

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I currently stand against approval of any further development in the City, until you come up with compatible means of transportation for the many proposed new dwellings and business projects you review/approve. And, suggest a moratorium to allow time to come up with solutions in that regard. *(Zebroski, Chet, Erickson Zebroski Design Group, Inc., E-mail, October 06, 2015)*

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Adding thousands of residents with inadequate investment in public transit will significantly impact the neighborhood, resulting in further dependence on cars while traffic congestion grows and degrades our quality of life. For example, the 10 Townsend bus is already at 95% capacity yet the Corovan DEIR claims no mitigation measures are needed. Public transportation to the site is limited to a single future bus line that is already overburdened, underfunded, and suffering maintenance and scheduling difficulties. SFMTA projections state that the future 22-Fillmore line serving an extended 16th Street transit corridor will be overburdened from the start -- constrained by funding challenges, inadequate bus capacity and service, rising amounts of automobile and truck congestion, and uncertainty about the future of the Caltrain tracks, High Speed Rail, and the I-280 freeway. SFMTA's own forecast through 2035 projects that the intersection at 7th, 16th, and Mississippi Streets will "degrade" to a service level of "F" -- among the worst in the city. Yet the DEIR fails to adequately address and mitigate these significant impacts.

A "Transit First" policy should put transit first and ensure that viable options be in place before we experience significant population growth. New studies of existing and cumulative conditions, inadequately addressed in the Corovan DEIR and not anticipated in the Eastern Neighborhoods Environmental Impact Report, must now be a priority and undertaken. *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

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Enhancements and improvements to transit is incredibly necessary in this area. That, I think, is an issue that needs to be dealt with. I'm glad to hear the previous presentation touched on some of those things, but that is inevitable to this area. *(Taskett, Jim, Transcript, October 1, 2015)*

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I respectfully urge the Planning Commission to... prioritize a Transit-first policy and ensure the provision of adequate public transportation before approving more large-scale projects in an area already plagued with traffic problems and limited public transportation, respect multiple area plan. *(Miller, Ruth, Transcript, October 1, 2015)*

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A dense development at the Corovan site would limit parking spots for its residents to foster pedestrian, bicycle and public transportation. Okay, so I can get that... If we are adding hundreds of residents to our neighborhood with the idea they'll use bicycles or public transit, then shouldn't pedestrian safety and

transit options already be in place before we begin building yet another development? (*Agor, Vicente, Transcript, October 1, 2015*)

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I would agree that we heard an impressive discussion today about growth in public transit. There were many ideas which should somehow find a ribbon into this EIR. (*Commissioner Moore, San Francisco Planning Commission, Transcript, October 1, 2015*)

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Friday, the 10 Townsend bus ride to my office that should be 17 minutes took 45+ minutes in the 10A non-commute hour due to backed up traffic. I ended up returning home by taking BART to 16th St. (way out of my way) and the 22 to avoid gridlock.

Adding more people who will be in front of me traveling in the directions of my destinations is worrisome to me. (*Hinshaw, Caroline, E-mail, September 13, 2015*)

### **Response TR-1**

These comments raise concerns related to existing transit conditions in the project vicinity, particularly the 10 Townsend line and planned extension of the 22 Fillmore line that serve the project area, and state that additional viable transit options should be in place to supplement lines that are already running near capacity before additional growth is allowed in the area. Other comments suggest the addition of project traffic would negatively impact transit trip times, and identify a general concern about needed transit infrastructure improvements in the project area, which they consider to be under-served by transit; these comments note that there are also substantial transit service issues in the area that cause delays.

The Draft EIR provides a description of the analysis of potential project-related impacts to transit services starting on page IV.A.46 for the existing plus project condition and on page IV.A.68 for the cumulative plus project conditions. The analysis of potential transit impacts to Muni was undertaken in a manner consistent with the Planning Department's Transportation Impact Analysis Guidelines, and utilized a transit screenline analysis to assess current and future capacity utilization for transit. Additionally, the proposed project design – with respect to vehicle access – was reviewed with SFMTA staff during project development. As stated in the Draft EIR, the proposed project would not conflict with or preclude planned and proposed transit and other streetscape improvements, and to minimize potential conflicts between vehicles, pedestrians, transit, and bicycles on streets adjacent to the project site. No project-specific or cumulative significant impacts related to transit conflicts (i.e., delay) were identified.

In addition, consistent with the Planning Department's Transportation Impact Analysis Guidelines, for local transit impacts on the Muni system, impacts would occur when a project's contribution causes the transit capacity utilization rate to exceed 85 percent, or when the transit capacity utilization rate already exceeds 85 percent, and the project would increase the transit capacity utilization rate by 5 percent or more. Essentially, if a line is already operating past the 85 percent transit capacity utilization standard, then a project would not result in a significant impact unless the project itself causes a significant increase in volume – in this case, 5 percent of the total volume. The analysis performed in the Draft EIR took into account the most recent Muni screenline data available. As shown on page IV.A.47, none of the screenlines operate over the 85% threshold under Existing plus Project Conditions and as shown on page IV.A.69, while several of the screenlines operate over the 85% threshold, the largest contribution by the project is to

the Southeast screenline where the project contributes 1.2% of the capacity utilization, which is less than 5% and therefore not considered a significant impact. Therefore, mitigation measures related to transit cannot be required pursuant to CEQA.

Note that development impact fees are imposed by San Francisco to address cumulative contribution to city-wide infrastructure. Some of these fees payable by proposed project, such as the Transportation Sustainability Fee and the Eastern Neighborhoods Infrastructure Fee, must at least in part go toward other transportation improvements. Recent and planned transit improvements in the project area are presented for information below.

Transit improvements are also planned in the Muni Forward program (formerly the Transit Effectiveness Project, or TEP). In the project vicinity, SFMTA recently upgraded service on the 10 Townsend line, including nighttime service every 30 minutes after 7:30 PM until midnight seven days a week and additional morning trips. As part of Muni Forward, the SFMTA has approved transit priority and pedestrian safety improvements for the 22 Fillmore route along 16th Street, including increasing frequency during the AM and PM peak period, rerouting service to 16th Street between Kansas Street and Third Street, transit-only lanes, transit bulbs, new traffic and pedestrian signals, and new streetscape amenities. In the interim, the 55 16th Street bus line was established in February 2015 to run along 16th Street between the Mission and 16th Street BART Station and the UCSF campus in Mission Bay.

As noted on page IV.A.46 of the Draft EIR, “The proposed project would add vehicle trips to streets with Muni bus service, including 16th Street, 18th Street, Rhode Island Street, and De Haro Street. However, as the relevant intersections and approaches are continuing to operate at an acceptable LOS, it is expected that these project-related vehicle trips would not affect transit operations and would generally not be in direct conflict with Muni buses and light rail vehicles. In addition, the proposed project would not be adding new curb cuts which could create substantial delays from vehicle queuing on the roadways which Muni operates upon. Furthermore, no bus and light rail stop locations exist directly adjacent to the project site. The nearest bus stop is located at 16th Street and Missouri Street and the nearest light rail stop is located at 3rd Street and South Street. As such, the proposed project would not substantially affect Muni transit operations (i.e., delays or operating costs). Therefore, the proposed project would have a less-than-significant impact on Muni transit operations.”

Potential impacts related to transit were adequately analyzed in the Draft EIR and the conclusion that these impacts are less than significant remains valid.

#### **Comment TR-2: Bike and Pedestrian Safety**

With high density traffic, people get agitated and frustrated and impatient....then tragedy happens. In my opinion that particular corner needs clear visibility. With Josh Smith’s bloated concept there would be none. Also, there should be a set back from the corner for parking for better visibility. A large truck in a hurry could whip around that corner and seriously injure someone. (*Musse, Jani, Email and Videos, October 02, 2015*)

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A dense development at the Corovan site would limit parking spots for its residents to foster pedestrian, bicycle and public transportation. That is a wonderful green and sustainable concept. But if we as a city want a “Transit First” policy, then why hasn’t traffic safety for pedestrians and bicyclists been adequately addressed in the Draft EIR? If we are adding hundreds of residents to our neighborhood with the idea that

they will use bicycles or public transit, then shouldn't pedestrian safety and transit options be in place before we begin building new developments? (*Agor, Vicente, E-mail, October 05, 2015*)

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Besides car accidents, I often walk to the 22nd Caltrain station so I can avoid driving. In several instances of crossing Mississippi and Mariposa, (This corner is one block away from 901 16th site.) Often, I have almost been run over while walking in the cross walk by either car, motorcycle, or bicycle. It is a very dangerous corner for pedestrians due to the very heavy congestion during morning and afternoon rush hour commute times.

In summary, I believe the planned increase in population density will absolutely make traffic worse. I absolutely believe that there will be more car accidents, bicycle accidents, and pedestrian accidents. The EIR draft does not describe how this new development will help alleviate all the future traffic problems and prevent unnecessary future accidents that it will create due to bringing a higher population density to the area. Please address the safety of the current and future residents of our community before building begins. (*Fermin, Gennie, E-mail, October 05, 2015*)

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The Mariposa on-ramp and off-ramp is already inadequate and I would even say dangerous for cars, pedestrians and bikers during rush hour. It's unacceptable to even think about more development without addressing these issues. Also, cars fly down the southern parts of Mississippi and Pennsylvania getting to Mariposa or to get into the city and it's a huge safety concern for those of us trying to get out of parking spots in the morning, walking our dogs or children to school. (*Horton, Michelle, E-mail, October 05, 2015*)

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A dense development at the Corovan site would limit parking spots for its residents to foster pedestrian, bicycle and public transportation. Okay, so I can get that. But as a city, if we want a transit-first policy, then why hasn't traffic safety for pedestrians and bicyclists been adequately addressed in the Draft EIR? If we are adding hundreds of residents to our neighborhood with the idea they'll use bicycles or public transit, then shouldn't pedestrian safety and transit options already be in place before we begin building yet another development? (*Agor, Vicente, Transcript, October 1, 2015*)

### **Response TR-2**

These comments relate to current pedestrian and bicycle safety conditions and the potential for increased hazards to bicyclists or pedestrians with the addition of project traffic. The potential for the proposed project to contribute to potentially hazardous conditions for pedestrians and bicyclists was assessed in the Transportation Impact Study (TIS) prepared for the Draft EIR in accordance with the Planning Department's Transportation Impact Analysis Guidelines and available for review at the Planning Department as part of Case File No. 2011.1300E. As summarized in the Draft EIR (pages IV.A.49 to IV.A.55), bicycle and pedestrian impacts were determined to be less than significant because the project would not result in overcrowding on sidewalks or bicycle routes that could lead to potentially unsafe actions, interfere with pedestrian or bicycle circulation, or create potentially hazardous conditions for pedestrians or bicycles due to loading or garage entrances. Potential impacts related to pedestrian and bicycle impacts were adequately analyzed in the Draft EIR.



While the project would not have significant impacts in relation to pedestrian and bicycle hazards, and therefore mitigation would not be warranted, specifics of the project design and additional improvement measures would contribute to safe routes and access to secure bicycle storage, as follows. As noted on page II.24 of the Draft EIR, pedestrian visibility improvements would be made to the intersection of 17th Street and Texas Street, assuming SFMTA and Public Works approval, as part of the proposed project by providing continental crosswalk markings and non-electronic pedestrian crossing signage along all approaches to the intersection. In compliance with Section 270.2 of the Planning Code, the project includes a mid-block pedestrian alley connecting 16th and 17th Streets that would provide an additional safe route option for pedestrians that is away from vehicular traffic or driveways. Additionally, implementation of Improvement Measures I-TR-5a and -5b would further reduce less than significant impacts related to bicycle safety through enhanced signage and street marking for bicycle parking and routes, parking restrictions for visibility near exits, prohibition of loading dock traffic during peak hours, and follow-up after a year of operations with SFMTA to determine whether additional measures would be desirable.

Signalization could also help address commenters' perceived safety concerns related to specific unsignalized intersections, by providing minimum required crossing times for pedestrians consistent with the federal Manual on Uniform Traffic Control Devices. See also Responses TR-11, TR-17, and TR-18 related to specific intersection signalization feasibility and status.

Access to driveways on neighborhood streets is further addressed in Response TR-16. Related topics of general traffic safety and safety related to the driveways and potential for queuing are further discussed in Responses TR-11 and TR-6.

### **Comment TR-3: Sidewalk Widening in ROW**

Pedestrian Safety and proposal to alter use of City Public Right of Way:

On page II.24 of the August 2015 EIR the project proponent suggests adhering to the Better Streets Plan recommended 15 foot sidewalks by Intruding onto the street and critical public right of way for the city. The suggested remedy is to extend the existing curb into the public right of way by five feet effectively narrowing 16th street by five feet. 16th street is a critical passage for bikes and transit and pedestrians and scooters and skaters and cars and trucks and "Google buses" and minibuses from nearby businesses and hospitals. It is not in the public interest to narrow the street instead the proponent must mitigate the impact of the five foot proposed encroachment by instead moving back the project five feet from the existing curb in order to adhere to the Better Streets Plan. The existing curb on Sixteenth should be preserved or 16th should be widened. The suitable side walk 15 foot minimum should be provided by the developer providing an easement for the public of at least 5 feet for foot traffic/pedestrian use. The project proponents Fig II -4 also reflects this atrocious proposed seizure of a critical street by a private developer in order to comply with city pedestrian safety initiatives. (*Cpuc, Jci, E-mail, October 04, 2015*)

### **Response TR-3**

This comment states that the widening of sidewalks along the project frontage on 16<sup>th</sup> Street should not utilize public right of way. Project plans, including the specifics of sidewalk widening in the public right-of-way, have been reviewed by SFMTA staff, who confirm that the roadway plans are allowable and does not demonstrably conflict with improvement plans for 16<sup>th</sup> Street, including the Better Streets Plan, and would not interfere with passage of bicycles, pedestrians, transit, or other vehicles on this roadway. SFMTA and Public Works would need to confirm final approval of the plans prior to construction of the widened sidewalks. As part of the proposed project, the project proponents would make improvements to

the sidewalk in the public right-of-way along the proposed project's frontage. As noted on page III.3 of the Draft EIR, the City is proposing to relocate the existing bicycle lane from 16th Street to 17th Street, as anticipated in Muni Forward. The proposed project would also accommodate these future planned changes in the bicycle network. This comment has been noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

#### **Comment TR-4: Traffic Calming**

As a resident, I walk this area with my dog every day during prime morning traffic hours. Any traffic calming measures that the planning commission can approve and implement immediately would be greatly appreciated. (*Agor, Vicente, E-mail, October 05, 2015*)

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City Planning should conduct additional traffic studies that are more current and robust and consider traffic calming measures. (*Nicholson, Jane, E-mail, October 05, 2015*)

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While the DEIR acknowledges the traffic-generating problems posed by the dense development, it does not adequately address the gravity of the situation nor does it satisfactorily assess proposed solutions. It ignores consideration of traffic reducing and/or calming measures proposed in previous years by the San Francisco Municipal Transportation Agency's (SFMTA) and community members for the Mariposa & Mississippi Street intersection as well as other intersections along Mariposa, and it relies on outdated data and a limited study of traffic conditions. In this way, the DEIR fails to identify solutions to predictable problems and neglects an invaluable opportunity to work with the community to mitigate those problems.

... Significant traffic calming and/or reducing measures (such as bulb-outs and pedestrian/green-scape islands) should be approved and implemented. Save the Hill agrees with SFMTA about certain traffic signal calming measures, and these and other options should be carefully considered. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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I respectfully urge the Planning Commission to support the metal shed Reuse alternative proposal and to acknowledge the limitations of the traffic data used in the Draft EIR. As a resident, I walk this area with my dog every day during prime morning traffic hours, so any traffic calming measures that the Planning Commission can improve and implement immediately would be greatly appreciated. (*Agor, Vicente, Transcript, October 1, 2015*)

#### **Response TR-4**

These comments request implementation of traffic calming measures for streets in the surrounding neighborhood. The proposed project does not demonstrably conflict with City and County of San Francisco plans for the surrounding sidewalks and roadways. As discussed further in Responses TR-6 and TR-2, the project would not have a significant impact related to traffic hazards or hazards to pedestrians or bicyclists. Per CEQA Guidelines section 15126.4, mitigation measures are required only for significant impacts of a proposed project. Because there are no significant impacts related to traffic hazards or hazards to pedestrians or bicyclists identified, traffic calming measures cannot be required as mitigation measures

pursuant to CEQA. As part of this document and the case file for the proposed project, these comments requesting traffic calming measures in the area are available to decision-makers and the sponsor and can be considered separate from environmental analysis of the project.

#### **Comment TR-5: Alternate Project Driveway Locations**

The mere fact of 388 automobiles coming and going from the project as proposed currently, would seem to indicate a traffic flow of unmanageable proportions. I recommend that any architect or planner for this site examine the possibility of sending some traffic onto 17th Street. Again, the size of the Walden proposal is hard to believe. (*Anasovich, Philip, E-mail, September 12, 2015*)

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The DEIR acknowledges traffic problems posed by this dense development, but it does not satisfactorily mitigate or address congestion caused by cars entering and exiting the proposed Mississippi Street parking garage. The project, as currently designed, is expected to generate over 4,000 new daily car trips. (*Baron, Bonnie, E-mail, October 03, 2015*)

#### **Response TR-5**

These comments suggest consideration of alternate or additional project driveway locations other than solely on Mississippi Street. The Planning Department reviewed the proposed project's ingress/egress plans for Mississippi Street. The TIS determined there were no significant environmental impacts related to the ingress/egress locations. Therefore, alternative driveway locations for environmental review purposes are not required and the following is presented for informational purposes.

The proposed project fronts on three roadways. The project proponents explain the rationale for the location of the driveways as follows. Curb cuts are prohibited for protected pedestrian, cycling, and transit-oriented frontages (Section 155(r) of the Planning Code), including 16th Street along the project frontage. Driveways on 17th Street were avoided to minimize potential pedestrian and bicycle conflicts because of the proposed relocation of Bicycle Route 40 (currently along 16th Street) and relatively high volume of bicycle traffic it would bring to that street as well as the character and pedestrian demand along 17th Street.

While not anticipated by the traffic modeling, Improvement Measure I-TR-9: Queue Abatement (page IV.A.63 of the Draft EIR) confirms that it is the responsibility of the owners/operators to prevent recurring vehicle queues from occurring on Mississippi Street, including the implementation of abatement measures if required. Similarly, Improvement Measure I-TR-6: Off-street Loading Management (page IV.A.57 of the Draft EIR) would further reduce the proposed project's less-than-significant impacts with regards to the potential for double parking on Mississippi Street by requiring the owners/operators to identify a Loading Coordinator for each new building. The project proponents would also implement a Transportation Demand Management (TDM) Plan (Mitigation Measure I-TR-2c) with a target to reduce project vehicle trips by 10 percent, which could also further reduce trips in and out of the project driveways.

#### **Comment TR-6: Project Driveway Queuing and Hazards**

The DEIR fails to adequately mitigate or address expected queuing in and out of the proposed project's Mississippi Street parking garage. With close to 400 units of housing and more than 24,000 square feet of commercial retail space, the project will generate an estimated 4,233 new car trips daily — with up to

12,361 trips daily by people entering and exiting the project. In spite of this compelling data, the report claims lines won't be significant and it defers responsibility for further studies or mitigation proposals until after the project is built. Additionally, the DEIR fails to sufficiently address expected pedestrian and vehicular hazards posed by the proposed development's single vehicle entry and exit point along Mississippi Street. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

#### **Response TR-6**

This comment raises concerns about queuing at the project vehicle access points and the potential for pedestrian and vehicular hazards at these access points. The potential for queuing at the proposed project driveways was assessed in the TIS prepared for the Draft EIR. As summarized in the Draft EIR (page IV.A.41), vehicles queuing on the vehicular traffic lanes to enter the parking garage are expected to be limited and would not cause a significant traffic hazards impact. As noted above under Response TR-6, while queuing issues are not anticipated, Improvement Measure I-TR-8: Queue Abatement (page IV.A.63 of the Draft EIR) confirms that it is the responsibility of the owners/operators to prevent recurring vehicle queues from occurring on Mississippi Street, including implementation of abatement measures if required. The project proponents would also implement a TDM Plan (Mitigation Measure M-TR-2c) with a target to reduce project vehicle trips by 10 percent, which could also further reduce vehicle trips in and out of the project driveways. The DEIR does not defer responsibility for further studies or mitigation proposals. No significant impacts were identified; therefore, no mitigation is required.

Pedestrian and bicycle safety is further discussed in Response TR-14.

#### **Comment TR-7: Traffic Interference with Emergency Bomb Squad**

SF BOMB SQUAD VEHICLE YARD – Public safety issue. Emergency Vehicle circulation delayed by increased traffic. As this is a potential target for terrorism, high density residential Conflicts with Area Plans and General Plan: (*Angles, Sean, E-mail, October 05, 2015*)

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SF POLIC BOMB SQUAD VEHICLE YARD. Third, this proposed project is near the city's bomb squad vehicle year. Emergency vehicle circulation will be delayed by increased traffic caused by new high-density residential units. Because the bomb squad vehicle yard is a known potential target for terrorism, high-density residential units should not be located within harmful proximity and direct sightline of the SF bomb squad vehicle yard. (*Dangles, Robert, E-mail, October 05, 2015*)

#### **Response TR-7**

These comments raise concerns that the project traffic would cause delays to bomb squad emergency vehicles. The San Francisco Police Department Explosive Ordinance Disposal Unit ("Bomb Squad") yard is located at 17<sup>th</sup> and De Haro Streets, about five blocks to the west of the project site. With the distance between locations, the proposed project would not have the potential to directly interfere with operation of the Bomb Squad site such as through proposed project queues blocking driveways. However, the proposed project would add vehicle trips to area streets that could be used by emergency vehicles, including those dispatched for an emergency from the Bomb Squad yard. The TIS prepared for the Draft EIR in accordance with the Planning Department's Transportation Impact Analysis Guidelines included analysis of the potential to impact emergency vehicles. As noted in the Draft EIR analysis for Impact TR-7 (page IV.A.57), the proposed project would not block travel lanes in the vicinity that might be used by

emergency vehicles or otherwise significantly interfere with emergency vehicles and the approved 16<sup>th</sup> Street improvements as it relates to transit-only lanes would provide emergency access in those lanes as well. As a result, the impact related to emergency vehicles, which includes those related to the Bomb Squad yard, was determined to be less than significant.

The comments also raise concerns regarding the potential for the Bomb Squad yard to be a potential terrorist target. The commenters provide no evidence or discussion regarding the likelihood of a terrorist attack on the Bomb Squad vehicle yard or how that relates to impacts that would be caused by the project, which is five blocks east of the Bomb Squad vehicle yard. No further response is necessary.

#### **Comment TR-8: Impact on Truck Route**

My comments are focused on the broad area of public right of way use and implications of traffic and project egress on mass transit and PDR viability due to the adjacent truck route. Overall viability of PDR: Potrero Hill and the City rely on the Routes immediately adjacent to the proposed project. 17th and Mississippi is a designated Truck Route both West on 17th and North on Mississippi. Thus impairment of the flow on these routes (city public right of way) is detrimental to the flow of materials and commerce into the City of San Francisco. On the original day of the Corovan hearing on the Draft EIR I personally witnessed traffic grossly impaired before 7:30 am on 17th approaching Mississippi from the East. Mississippi was full in part due to the Caltrain at grade crossing at 16th and Mississippi. A commercial vehicle (Golden Gate Meat Co.) went into oncoming traffic to go around the traffic congestion for a half block and then proceeded down 17th. (*Cpuc, Jci, E-mail, October 04, 2015*)

#### **Response TR-8**

This comment states that adjacent roadways are Truck Routes and that impairment of these routes would impact the flow of materials and commerce and provides anecdotal evidence of commercial vehicle actions at congested intersections. Map 15 in the Transportation Element of the San Francisco General Plan identifies routes with significant truck traffic, but contrary to this comment, neither 17<sup>th</sup> Street nor Mississippi Street are identified as routes having significant truck traffic and San Francisco does not otherwise designate “Truck Routes.”

Economic impacts (“commerce”) are separate from environmental impacts and generally not studied in environmental analyses unless there is substantial evidence of related physical impacts on the environment. Increases in traffic volumes and the potential for related increase of delay for vehicles engaging in business-related trips would not generally be considered an environmental impact related to commerce above and beyond transportation-related and associated secondary impacts (i.e., air quality and noise) already identified in the Draft EIR and CPE Checklist.

A complete TIS was prepared and is available for review at the Planning Department as part of Case File No. 2011.1300E. Section IV.A, Transportation and Circulation, of the Draft EIR presents the results of the TIS. As further discussed in Response TR-11, the Draft EIR acknowledges that the project would contribute to congestion at the intersection of 17th Street and Mississippi Street and would contribute fair-share funding to the signalization at this intersection, which would allow the intersection to operate within acceptable service levels. Because SFMTA staff has not prioritized or otherwise identified full funding of this improvement, implementation is considered uncertain despite contributions from the project and the impact cannot be said to be fully mitigated so would be considered significant and unavoidable. The “flow of materials” is implicit in assessment of automobile delay and no separate or additional analysis is warranted.

**Comment TR-9: Construction-Period Traffic Impacts**

Where traffic restrictions and detours affect State highways, a Transportation Management Plan (TMP) or construction Traffic Impact Study may be required of the City for approval by Caltrans prior to construction. Please ensure that such plans are also prepared in accordance with the TMP requirements of the corresponding jurisdictions. For further TMP assistance, please contact the Office of Traffic Management Plans/Operations Strategies at 510-286-4579. TMPs must be prepared in accordance with California Manual on Uniform Traffic Control Devices. Further information is available for download at the following web address:

<http://www.dot.ca.gov/hg/traffops/engineering/mutcd/pdf/camutcd2014/Part6.pdf>. (*Maurice, Patricia, California Department of Transportation (Caltrans), Letter, September 24, 2015*)

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Currently there is active and long term construction at the crossing of 16th street for Mission Bay UCSF Children's hospital, UCSF Mission Bay university, and Daggett Place. Starting construction in a few months at the 901 16th site would have a severe negative impact on the environment and health of the community. Poor air quality, increased noise levels, safety due to large building equipment and road closures are just a few of the cumulative negative impacts that come to mind if there is an additional active construction approved at this location. I am not finding the section in the EIR where cumulative impacts for this particular corner in Potrero were described. Please let me know where this information is in the report. (*Friedman, Holly, E-mail, October 04, 2015*)

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Construction Phase, request that the Final EIR provide time lines of this Project with any other; proposed, concurrent or future projects that may impact this Project.

a. A construction time line showing all ongoing/current or upcoming projects in the vicinity of this project, especially in the Mission Bay/UCSF complex. (*Hong, Dennis, E-mail, October 05, 2015*)

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My name is David Boyd. I live on Mariposa -- in a house between Mariposa and Texas, on Mariposa Street between Texas and Missouri, one block from the Corovan site. We are quite attuned to the inconveniences and disruptions that are associated with living in what's really becoming a construction zone, and very concerned about what happens after the construction is completed. (*Boyd, David, Transcript, October 1, 2015*)

**Response TR-9**

The comments raise concerns regarding the construction-period traffic impacts and cumulative construction impacts.

Construction of the Project would not commence until late 2016 at the earliest, after substantial completion or full completion of the current 1000 16<sup>th</sup> Street (Daggett Place) project construction and the recent UCSF Hospital construction. Because environmental analysis, project approvals, and construction starts and schedules occur over variable time lines, a time line of potential future construction projects that have not yet begun is speculative. Rather, the potential for the proposed project to result in construction-period

impacts is minimized on a project-specific basis such that the potential for contribution to cumulative impacts is less than significant.

Construction-related transportation impacts are described in Impact TR-8 and Impact C-TR-6 on Draft EIR pages IV.A.58, IV.A.59, and IV.A.72. The construction impact assessment is based on preliminary information provided by the project proponent on the construction program, including construction duration, truck trips, site staging, and construction plans, and the City's understanding of similar construction projects throughout the City.

As stated on page IV.A.58 of the Draft EIR, construction impacts would be predominantly limited to the site and limited in duration; therefore, project impacts were determined to be less than significant. Project proponents would additionally implement a construction management plan (Improvement Measure I-TR-8) to further reduce the project's less-than-significant impacts related to potential conflicts between construction activities and pedestrians, transit, and autos, and to require coordination with the City, who would also manage and coordinate other construction management plans in the area (page IV.A.72 of the Draft EIR).

For comments that also reference other potential construction-period impacts, see Responses AQ-1, HZ-1, and NO-1, related to air quality, health, and noise during the construction-period. Cumulative impacts, including those related to construction impacts, were addressed in the *Eastern Neighborhoods PEIR*, and is discussed further in Response ES-1.

#### **Comment TR-10: Parking**

After reading the DEIR for the proposed Corovan development at 901 16th, I am saddened that yet another mega housing project, exceeding historical height limits by more than 20 feet with disregard for parking needs, noise reduction and most of all solutions to traffic mitigation may very well slam another pile of, excuse my profanity, shit onto the residents of Potrero Hill. (*Iaconi, Mara, E-mail, September 13, 2015*)

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The proposed project will significantly exacerbate existing traffic and parking problems in the immediate vicinity of the project and nearby blocks.

...The report also indicates that the project will create spillover demand of between 358-458 parking spots. This is a significant negative impact for residents in the adjoining blocks. And, it will only get worse with other developments currently under construction and planned for the neighborhood. (*Hutson, Richard, Letter, September 17, 2015*)

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There is a huge overflow of parking from the Mission Bay area that impacts the parking abilities of my employees coming to work here. They are already having to park 5, 6 or 7 blocks away as our parking is being taken by others not even working in the area. Parking and traffic are huge concerns. (*Engel, Rebekah, Ermico Enterprises, Inc., E-mail, September 28, 2015*)

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My concern for about the development at 16th and Mississippi Streets is the traffic and parking... I am sure you have gotten many letters with the same complaints, but by building housing and businesses without parking is going to impact the neighborhood. (*Gee, Gigi, E-mail, September 28, 2015*)

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Moreover, the project's proposed 338 parking spaces for its proposed 395 housing units is grossly excessive. This site is located just a short 5-10 minute walk away for the almost 10,000 jobs in Mission Bay – the UCSF campus jobs, the office complexes jobs, and the hospital jobs. And it is adjacent to the new MUNI 55 route with direct shuttle to Third Street light rail and the 16th Street BART station. The real reason the Sponsor wants this parking is to market these housing units to Silicon Valley workers who use I-280 instead to commute 100 miles daily to work. (*Yerba Buena Neighborhood Association, Letter, October 01, 2015*)

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The developers want to squeeze as many units as possible into this square-block space, adding at least four hundred cars--perhaps many more--into a neighborhood where parking and mobility are already stressed. (*Delacorte, Peter, E-mail, October 03, 2015*)

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This project scope of hundreds of new units on a busy intersection seems ill-considered to me. This is a residential street and there needs to be consideration given to traffic and parking issues. I disagree with the EIR that there will be no impact on the traffic patterns; that is ridiculous. (*Farey-Jones, Lucy, E-mail, October 04, 2015*)

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Lastly, the EIR draft does not accurately describe the parking in the area surrounding 901 16th. Due to the new UCSF hospital that was built one block away and the current businesses in the area, there is no parking in that area during work hours. On occasion, we have cleaning service come to our home during those work hours. It takes them 30 minutes to an hour to find parking near or in front of our building. I am concerned that the new development does not have adequate parking for their planned retail businesses. Besides the parking, I feel the EIR draft does not address how San Francisco city will help alleviate the lack of business parking by public transportation. We need more public transportation as well as more parking solutions in our area due to the future increase of businesses and residential units. (*Fermin, Gennie, E-mail, October 05, 2015*)

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First of all I am concerned with the traffic congestion and parking issues that are not addressed properly in the DEIR.

...It goes without saying that parking is going to be a major issue and all of these units will have massive spillover into the surrounding neighborhood. There is not enough parking. The reality is that many residents will have cars that will not have enough assigned parking and they will use street parking. To say that some people won't have cars is just not accurate. Many will come to this area for easy freeway access which means more cars creating parking issues in addition to the traffic issues. (*Horton, Michelle, E-mail, October 05, 2015*)



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Because of current traffic congestion and the lack of parking (during business hours), as well as blocking city views for the current Potrero Hill residents, I feel the proposed development at 901 16th Street should be sized and scaled down. Please consider reducing the number of residential units and a decrease in building height as an alternative to the proposed plan which will be a massive eye sore for the Potrero Hill community and a daily pain for Potrero Hill residents parking and driving near the Corovan site.

*(Leerkamp, Chris, E-mail, October 05, 2015)*

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The report also indicates that the project will create spillover demand of between 358-458 parking spots. This is a significant negative impact for the residents in the adjoining blocks. It will only get worse with other developments currently under construction and planned for the neighborhood. *(Nicholson, Jane, E-mail, October 05, 2015)*

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As a business and property owner on Potrero Hill for 25 years, I strongly object to the density of the subject project. The additional street parking and the enormous amount of traffic that this development will bring will severely stress the capacities of the adjacent streets in this neighborhood, including 17th St., where our business, The Bottom of the Hill, is located.

... The little bit of street parking that we do have at the moment will also be highly affected by this massive project, since 400 more cars will then have to find a place to park. *(Owen, Kathleen, Bottom of the Hill, E-mail, October 05, 2015)*

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The DEIR concludes the planned development will create spillover demand of between 358 - 458 parking spots — cars that will clog surrounding streets.

The DEIR shirks responsibility for parking problems posed by the dense development by claiming no legal obligation, but it should acknowledge the degree to which an alternate proposal and further requirements of the developers would prevent unnecessarily negative impacts. *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

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You've heard it's backed up for blocks at certain times of the day, and also the spillover parking that's not going to be accommodated in the project. *(No Name Given 1, Transcript, October 1, 2015)*

### **Response TR-10**

These comments are related to the provision of parking, with some comments asserting the project includes too little parking and some asserting it includes too much. As specified on page III.9 of the Draft EIR, the currently proposed project includes 388 off-street parking spaces, which is a ratio of 0.85 parking spaces per residential unit and would require approval of an exception to the Planning Code to allow *more* than the maximum 0.75 spaces per unit provided by Section 151.1 of the Planning Code. A complete TIS

was prepared and Section IV.A, Transportation and Circulation of the Draft EIR presents the results of the traffic analysis. As noted in these documents and pursuant to Public Resources Code Section 21099(d), the adequacy of parking is not considered a CEQA impact for infill projects such as the proposed project. As noted on pages IV.1 and IV.2, the project qualifies as an infill project pursuant to Public Resources Code Section 21099(d). However, as discussed on page IV.2 of the Draft EIR, the Planning Department acknowledges that parking conditions are of interest to the public and decision-makers and an analysis of parking demand and provisions was included for informational purposes (pages IV.A.23-IV.A.25, IV.A.34, and IV.A.59-IV.A.63 of the Draft EIR).

As discussed in the Draft EIR on page IV.A.60, parking conditions are not static because the parking supply and demand varies from day to day, from day to night, from month to month, etc. The availability of parking spaces (or the lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel. The Draft EIR transportation analysis accounts for the potential secondary effects of cars looking for parking spaces in areas with a limited parking supply, noting that these secondary effects are typically offset by a reduction in vehicle trips due to others, aware of the constrained parking supply, who choose to reach their destination by other modes. As noted in the Draft EIR, such shifts to transit service or other non-vehicular modes are consistent with the City's "Transit First" and other General Plan policies.

The analysis identified an unmet project parking demand of 358 parking spaces in the midday and 458 parking spaces in the evening. As discussed on page IV.A.61, a survey of parking in the area found that 515 parking spaces were unoccupied in the vicinity during the midday period and 1,420 parking spaces were unoccupied during the evening period. Taking into account additional off-street parking spaces in nearby parking garages, the Draft EIR concludes that unmet parking demand of the project could be accommodated within existing on- and off-street parking spaces. However, there is no minimum amount of parking required for the site under Section 151.1 of the Planning Code and the Planning Commission could reduce project parking provisions during the approval process such that unmet parking demand could result.

Note also that after working with local residents and businesses, the SFMTA Board adopted new parking regulations on April 5, 2016 that include implementation of metered parking along 16<sup>th</sup> Street between Mississippi Street and Vermont Street (Resolution No. 16-036). The metered parking is intended to improve parking management along 16<sup>th</sup> Street in the vicinity of the proposed project.

Comments supporting either more or less parking have been noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

**Comment TR-11: Traffic, General**

I cannot close without mentioning that the Draft Environmental Impact Report (DEIR), which is invoked to allow the project to proceed, is fatally flawed. The data on which it is based are often outdated or erroneous. And when a serious problematic consequence of the project is revealed (e.g., traffic congestion, impact of the Warriors Event Center, etc., etc.), it is simply ignored or noted that there is no feasible mitigation. It is a shocking document! Makes one wonder why they bother if the findings are so easily dismissed. (*Boyd, David, E-mail, September 07, 2015*)

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While the many developments I am hearing about or see are not yet constructed and occupied, the time it takes me to drive to the Courthouse has already become outrageous. I have to plan for at least a half hour travel time, and I have been as much as a half hour late to court hearings because it took me an hour to drive that very short distance. All of 7th , 9th and even 11th Streets were clogged on a morning about a week ago. *(Hinshaw, Caroline, E-mail, September 13, 2015)*

After reading the DEIR for the proposed Corovan development at 901 16th, I am saddened that yet another mega housing project, exceeding historical height limits by more than 20 feet with disregard for parking needs, noise reduction and most of all solutions to traffic mitigation may very well slam another pile of, excuse my profanity, shit onto the residents of Potrero Hill. *(Iaconi, Mara, E-mail, September 13, 2015)*

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The proposed project will significantly exacerbate existing traffic and parking problems in the immediate vicinity of the project and nearby blocks.

At certain times of the day traffic is backed up for many blocks in all directions to the extent that it takes several minutes to drive just one or two blocks. Adding several thousand new car trips a day is unacceptable. *(Hutson, Richard, Letter, September 17, 2015)*

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My concern for about the development at 16th and Mississippi Streets is the traffic and parking. *(Gee, Gigi, E-mail, September 28, 2015)*

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I'll focus instead on the increased traffic and congestion that will inevitably come with the addition of 400 units to the already clogged arteries of 16th and 17th Streets. As things are, going east, west, or north from the north side of the hill between four and six o'clock is sort of urban nightmare that used to be limited to downtown and Bay Bridge routes.

...The developers want to squeeze as many units as possible into this square-block space, adding at least four hundred cars--perhaps many more--into a neighborhood where parking and mobility are already stressed.

...It's not unreasonable to foresee half-hour travel times going west on 16th Street from Texas Street to Potrero Avenue, or east on Mariposa Street to the 280 freeway, or (worst of all) north on Seventh Street or Ninth Street. *(Delacorte, Peter, E-mail, October 03, 2015)*

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We have been protesting this site as well as the site on carolina st for many reasons but the one you all seem to ignore is traffic. I would love to ask everyone at city hall to send a copy of where the people live who work at city hall. When I asked the people at the first corovan meeting where they lived almost no one lived in San Francisco. You can build high rises until the cows come home but here is no place for traffic. Come to the design center of a morning or evening.....the streets back up all over lower Potrero hill streets. I every direction and the two behemoths being built on the old design center building site as well

as the entire city block at Brennan and eighth are unimaginable nightmares not yet I habited. *(Meakin, Rita, E-mail, October 03, 2015)*

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There are at least 15 projects that will forever change the neighborhood not in a positive way...traffic is already a nightmare. What took me 5 minutes to go from my home on Wisconsin street to the U.C.S.F. Bakar Center, now is at least 45 minutes and the site that is currently under construction at 16th and 7th is going to make things an even bigger nightmare. *(Sundell, Carol, E-mail, October 03, 2015)*

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My concerns regard the lack of infrastructure in place to handle the many thousands of new residents and their vehicles that will come with these new apartments. The Corovan Project in particular, because it is so close to my home, addresses the deficiencies in both 16th and 17th Streets which are the obvious conduits from the western side of the city into Mission Bay. The traffic has increased so noticeably that beginning at 2pm there is virtual gridlock at 16th and Mariposa with cars blocking the box in their effort to reach the 280 freeway. I do not believe the recent traffic study truly examined what is happening here. *(Adams, Lynka, E-mail, October 04, 2015)*

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The draft Environmental Impact Report appears incomplete, insufficient and inadequate due to obsolete studies and false facts.

...In conclusion, I strongly urge the Planning Department to reject this draft Environmental Impact Report and to not approve this proposal for housing. *(Angles, Sean, E-mail, October 05, 2015)*

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This project scope of hundreds of new units on a busy intersection seems ill-considered to me. This is a residential street and there needs to be consideration given to traffic and parking issues. I disagree with the EIR that there will be no impact on the traffic patterns; that is ridiculous. *(Farey-Jones, Lucy, E-mail, October 04, 2015)*

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From my perspective, the two issues that are most critical to me are (1) ensuring that traffic issues be dealt with adequately and (2) ensuring that this new building is not overly dense. From my reading of the materials that I have available to me, neither of these concerns have been adequately addressed by the builders or the city. *(Firpo, Janine, E-mail, October 04, 2015)*

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I have many concerns about the impact that this development will have on our neighborhood, but my two greatest regard traffic and PDR businesses.

As it stands now, with UCSF currently operating at not even half capacity, even driving the relatively short distance between my work and home poses an ever-increasing challenge. Throw in a Giants home game

and our neighborhood becomes completely gridlocked. This situation has yet to be seriously addressed. (*Angeli-Morse, Audra, Thee Parkside, Dino & Luigi Presents, E-mail, October 05, 2015*)

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I am most concerned about the traffic and parking in my area. Currently, the congestion in the morning and afternoon rush hours bring an endless stream of cars right in front of my building as well as in front of the Corovan site. It is extremely difficult to back out of our building's garage due to the traffic. On occasion, my car has been completely blocked off due to several construction trucks, regular commuters, U.S. postal vans, motorcycles, and bicycles either just double parked or bumper-to-bumper traffic. I often have to ask my husband to help me back out. He often asks me to help him back out because we have witnessed other cars and bicycles colliding with each other. My car has been hit twice in the past 5 years I have lived here. My car was parked outside waiting for my husband. Another car backing out hit my car's driver side. In another instance my car was hit from behind again my car was parked. In both events, I was in the car with brake lights on.

... In summary, I believe the planned increase in population density will absolutely make traffic worse. I absolutely believe that there will be more car accidents, bicycle accidents, and pedestrian accidents. The EIR draft does not describe how this new development will help alleviate all the future traffic problems and prevent unnecessary future accidents that it will create due to bringing a higher population density to the area. (*Fermin, Gennie, E-mail, October 05, 2015*)

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I've attended two of the meetings and made a statement regarding the Corovan proposal (Case No. 2011.1300E). I won't go into my previous statements about this difficult intersection's traffic congestion and what will follow if the developers' proposal is approved (either one of them – the original or the so called “reduced density alternative which doesn't actually reduce much density”). (*Gemignani, Michael, Paragon Frames, E-mail, October 05, 2015*)

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This Corovan Project is of great concern to all of us who live in this area. The rush hour traffic is out of hand already in this highly congested area. A new freeway ramp should be built due to the increase of the UC hospital, ballpark and all the new apartment buildings that have been built within the last 5 years. There is so much noise, pollution, traffic now that this area is not even a family oriented, livable place. (*Hill, MG, E-mail, October 05, 2015*)

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First of all I am concerned with the traffic congestion and parking issues that are not addressed properly in the DEIR. Traffic is already very congested during rush hour of cars getting on and off the freeway at Mariposa. I live on Mississippi and 18th. It has taken me 20+ minutes to get up Mississippi to do clogged streets. This is without the completion of the current development projects on 16th which will already make it worse. Nothing is being done to adequately address the traffic congestion now much less if this new Corovan development happens. Nothing is being done to adequately address the traffic congestion now much less if this new Corovan development happens. The Mariposa on-ramp and off-ramp is already inadequate and I would even say dangerous for cars, pedestrians and bikers during rush hour. It's

unacceptable to even think about more development without addressing these issues. *(Horton, Michelle, E-mail, October 05, 2015)*

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The current EIR on the Corovan site reflects the current state and outlines best approaches and constraints on the following areas :

- Traffic impact and plans for mitigation *(Huie, Bruce, Dogpatch Now, E-mail, October 05, 2015)*
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Because of current traffic congestion and the lack of parking (during business hours), as well as blocking city views for the current Potrero Hill residents, I feel the proposed development at 901 16th Street should be sized and scaled down. Please consider reducing the number of residential units and a decrease in building height as an alternative to the proposed plan which will be a massive eye sore for the Potrero Hill community and a daily pain for Potrero Hill residents parking and driving near the Corovan site. *(Leerkamp, Chris, E-mail, October 05, 2015)*

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It is hard to imagine how the nearby impending developments will worsen the already deplorable air quality and the dire traffic congestion situation, and harder still to understand how anyone with the ability to curb more negative impacts would fail to do so. *(Miller, Ruth, E-mail, October 05, 2015)*

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The project and the DEIR highlight inadequate and inaccurate analysis of Traffic, Parking and Transit. The DEIR acknowledges that the proposed Corovan Project will significantly and unavoidably worsen traffic congestion. It identifies at least four intersections that will be severely impacted. Three of them, Mississippi project has a m Mariposa, 17th and Mississippi, and 16th and Mississippi directly impact all of the residents of Potrero Hill and the jammed intersections at the bottom of my block (Mississippi and Mariposa) are currently a nightmare. *(Nicholson, Jane, E-mail, October 05, 2015)*

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As a business and property owner on Potrero Hill for 25 years, I strongly object to the density of the subject project. The additional street parking and the enormous amount of traffic that this development will bring will severely stress the capacities of the adjacent streets in this neighborhood, including 17th St., where our business, The Bottom of the Hill, is located.

... I am not anti-development by any means and I do realize that the city has a housing shortage, but I feel that this is too much too fast and that our beloved neighborhood should have a stronger infrastructure in place before these projects can be built. *(Owen, Kathleen, Bottom of the Hill, E-mail, October 05, 2015)*

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I currently stand against approval of any further development in the City, until you come up with compatible means of transportation for the many proposed new dwellings and business projects you

review/approve. And, suggest a moratorium to allow time to come up with solutions in that regard. (Zebroski, Chet, Erickson Zebroski Design Group, Inc., E-mail, October 06, 2015)

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As you heard in an earlier presentation, we've got big issues that really aren't addressed in this EIR, around the 7th and 16th Street intersection, high speed rail, a lot of traffic and circulation issues. (Woods, Corinne, Transcript, October 1, 2015)

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Looking at this project and looking at the core of the project, how traffic is able to flow in and out of the project without becoming a major disruption on 17th Street and on 16th Street, but mainly on Mississippi Street, is very important because those are our accesses out to downtown and back home, and those are the ones that we have to take overconcentration in consideration about. And I think our developer has done an excellent job in doing so. (Hatter, Edward, Transcript, October 1, 2015)

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This project will channel a lot of traffic right into where it -- into -- on freeway traffic is being funneled from the entire hill and neighboring projects. And some of that traffic is going to be pushed, pushed to neighboring streets such as Mariposa which are not evaluated in the area. (Meroz, Yoram, Transcript, October 1, 2015)

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That being said, I want to focus on the traffic and what's going on there. I actually walk about three blocks to UCSF gym because I teach there a little bit and also work out there. And I'm telling you, it's hell now. Just getting across that intersection is just unbelievable. God forbid -- I work on the Peninsula. God forbid, I forget to take the Cesar Chavez exit. I live on Mariposa Street, but if, on game day, I miss that Cesar Chavez exit, I'm in traffic for 20 minutes.

So there's something wrong. Either the traffic count was done on a Saturday, or it was somehow, in my opinion, misread, because it is a serious traffic concern for me, and it's actually getting very difficult to even get home at any kind of reasonable time in the commute. Anyway, I hope you guys will look at this report closer and see if it's really accurate to what's going on there. (Dwyer, Richard, Transcript, October 1, 2015)

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Without repeating a lot of things that everybody's said, I would just like to emphasize that the Draft EIR says that there are unavoidable, substantial impacts on the neighborhood, primarily traffic. (No Name Given, Transcript, October 1, 2015)

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Thank you for your attention this evening at the hearing on Items 13 and 14. As I said in my three minute speech I was going to forward onto you some video of the traffic situation that we in the eastern neighborhood must endure now on a daily basis.

I meant to say this last night. You, your fellow commissioners and the entire planning department can plan for months for better transit to this area with more buses, rails, subways etc....but none of that will make any difference. The amount of cars that pour into San Francisco from the South Bay, the East Bay and the North Bay is nothing this city has never known. The city transit helps those who live within the city, but the commuters are not going to all of a sudden, for example, take a bus from the South Bay. Creating more density is not the answer. The Owen Street addition will help a little, but it will not solve the problem. Giving permission for another oversized, bloated....REALLY unattractive apartment complex on this corner, would be a travesty.

...When you go up to the Vimeo site, you can view any of the Daily Traffic Reports that I don't send below.

Here is some video footage of the Daily Traffic Report

<https://vimeo.com/140330174>

<https://vimeo.com/140823205>

<https://vimeo.com/141019001>

<https://vimeo.com/140118668>

<https://vimeo.com/140100070>

<https://vimeo.com/140474798>

<https://vimeo.com/140474827>

<https://vimeo.com/140487721>

<https://vimeo.com/140699498>

<https://vimeo.com/140699512>

*(Musse, Jani, Email and Videos, October 02, 2015)*

[The following are City staff summaries of videos received via the above email:

1. Intersection of Mississippi Street and 16th Street on September 21, 2015

This is an approximately 1:40 minute video showing generally congested morning traffic conditions in the area of 16th Street and Mississippi, including the Caltrain railroad crossing. The views shown include the Caltrain crossing with the gate up and down for a passing commuter train, east-bound traffic on 16<sup>th</sup> Street, north-bound traffic backed up on Mississippi Street, traffic passing through the 16<sup>th</sup>/Mississippi/7<sup>th</sup> Street intersection.

2. Mississippi Street and Mariposa Street on September 22, 2015

This is an approximately 4:00-minute video showing generally congested morning traffic conditions between the intersection of Mississippi and Mariposa Street and the north-bound I-280 off-ramp. The views include southeast across the Mississippi and Mariposa intersection with west-bound traffic on Mississippi backed up towards I-280, west bound vehicles on Mariposa slowly moving towards Mississippi, and vehicles backed up on the north-bound I-280 exit ramp, turning right (west) and left (east) on Mariposa.



3. Mississippi Street, 16th Street and 7th Street on September 24, 2015

This is an approximately 3:40-minute video showing generally congested late morning traffic conditions at the intersection of Mississippi Street, 16th Street and 7th Street. The views include east-bound vehicles stopped at the 16<sup>th</sup> Street crosswalk (with the Daggett project in the background), north-bound vehicles on Mississippi backed up towards Mariposa and crossing the intersection, a commuter train crossing 16<sup>th</sup> Street, south-bound vehicles on 7<sup>th</sup> Street stopped at the crosswalk, west-bound vehicles on 16<sup>th</sup> Street crossing the railroad tracks and proceeding through the intersection, and east-bound vehicles on 16<sup>th</sup> Street passing through the intersection and crossing the railroad tracks. Two trains cross 16<sup>th</sup> Street during this video, with consequent traffic backed up on Mississippi, 16<sup>th</sup> Street and 7<sup>th</sup> Street waiting for the crossing guard to raise and signal to change.

4. Mariposa and Mississippi Streets and Mariposa and Texas Streets on September 25, 2015

This is an approximately 1:25-minute video of generally congested early evening traffic conditions between the intersections of Mariposa and Mississippi Streets and Mariposa and Texas Streets. The views include a walk west on Mariposa showing east-bound vehicles slowly moving downhill from Texas Street to Mississippi Street, with north- and south-bound vehicles on Mississippi crossing Mariposa.

5. 17th Street and Mississippi Street and Mississippi Street and 16th Street on September 25, 2015

This is an approximately 3:00-minute video of generally congested traffic conditions between the intersection of 17th Street and Mississippi Street and the intersection of Mississippi Street and 16th Street. The views include west-bound vehicles on 17<sup>th</sup> Street slowly turning right on Mississippi Street and moving north towards 16<sup>th</sup> Street (opposite the east side of the project site), a commuter train crossing 16<sup>th</sup> Street with north-bound vehicles on Mississippi slowly passing through the 16<sup>th</sup> Street intersection, and vehicles on Mississippi backed up to 17<sup>th</sup> Street and slowly moving north.

6. Mariposa and Mississippi Streets on September 28, 2015

This is an approximately 2:50-minute video of generally congested late-morning traffic conditions between the intersection of Mariposa and Mississippi Streets and the intersection of 16th and Mississippi Streets. The views include a walk north on Mississippi Street showing vehicles backed up from 16<sup>th</sup> Street and slowly moving north, joined by west-bound vehicles from 17<sup>th</sup> Street, north-bound vehicles on Mississippi backed up to Mariposa and slowly passing through the 17<sup>th</sup> Street intersection with Mariposa, east-bound vehicles on 16<sup>th</sup> Street stopped at the intersection and backed up towards Missouri Street, and vehicles crossing the 16<sup>th</sup> Street intersection with Mississippi.

7. Mariposa and Mississippi Streets on September 29, 2015

This is an approximately 2:00-minute video showing generally congested late morning traffic conditions between the intersection of Mariposa and Mississippi Streets and Mariposa Street opposite the southbound onramp to 280. Views include a walk east on Mariposa from the Mississippi Street intersection showing a slow, continuous movement of west-bound vehicles backed up to Pennsylvania Street, west-bound vehicles on Mariposa slowing at the Pennsylvania intersection, a passing north-bound commuter train passing below Mariposa, and north-bound vehicles slowly exiting I-280 on the Mariposa Street off-ramp.

8. Mississippi and 16th Streets on September 29, 2015

This is an approximately 4:20-minute video showing generally congested traffic conditions in the area of the intersection of Mississippi and 16th Streets, including the Caltrain railroad crossing. The views include the intersection at 16<sup>th</sup> Street, Mississippi Street and 7<sup>th</sup> Street with the Daggett project in the background, the Caltrain crossing guard lowering for a south-bound commuter train, north-bound vehicles on Mississippi passing through the intersection and continuing on 7<sup>th</sup> Street, vehicles slowly but steadily moving north on Mississippi Street, backed up to Mariposa Street, south-bound vehicles from 7<sup>th</sup> Street turning east west on 16<sup>th</sup> Street and continuing south on Mississippi Street, and a north-bound commuter train crossing 16<sup>th</sup> Street, stopping east-bound vehicles at the 16<sup>th</sup> Street and Mississippi Street corner.

9. Mississippi Street between 16th and 17th Streets on September 30, 2015

This is an approximately 3:50-minute video showing generally congested morning traffic conditions along Mississippi Street between 16th and 17th Streets, and of the Caltrain crossing. The views include the camera walking south on the east side of Mississippi Street towards 17th Street, showing north-bound vehicles on Mississippi initially stopped and then slowly but steadily moving north, a north-bound commuter train crossing 16th Street, momentarily stopping east-bound traffic at the 16th/Mississippi/7th Street intersection, followed by a second walk down Mississippi Street again showing traffic slowly moving north and backed up to 17th Street.

**Response TR-11**

These comments make either general references to concerns about traffic and congestion or provide anecdotal experience of traffic congestion. General traffic congestion concerns either explicitly or implicitly encompass many specific underlying topics. The topics contributing to general congestion concerns are further addressed in the specific topics following this (TR-12 through TR-23), including specifically the age of the traffic data in Response TR-13, other large projects in the area in Response TR-14, adequacy of the traffic analysis in Response TR-12, the feasibility of mitigation in Response TR-17, and others.

As discussed in Chapter II of this document, consistent with local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, San Francisco has adopted VMT criteria in place of automobile delay criteria and VMT/induced automobile travel impact analysis is provided in Section IV.A, Transportation and Circulation, in addition to the traffic delay (LOS) analysis.

The VMT analysis determined that, based on average daily VMT substantially below regional averages, the impact related to VMT would be less than significant. However, because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA.

In regards to vehicle delay, a complete TIS was prepared and Section IV.A, Transportation and Circulation of the Draft EIR presents the results of the transportation analysis, including traffic.

The TIS was completed in coordination with the San Francisco Planning Department according to the Planning Department's Transportation Impact Analysis Guidelines and addresses traffic, transit, pedestrian, bicycle, loading, construction, emergency vehicle access, and parking. The analysis of traffic

congestion focused on the proposed project's effect on intersection and highway ramp operations and considers the addition of the project's traffic to existing conditions as well as future (2025) cumulative conditions. Existing counts were collected in June 2012 or July 2014 for each intersection (see Response TR-13 for discussion of more recent counts that were performed to address comments on the Draft EIR that conditions have since changed). Level of Service (LOS) at study intersections was calculated using the Synchro 8 software as specified by the Planning Department's Transportation Impact Analysis Guidelines and the Highway Capacity Manual.

Based on this analysis, the proposed project was found not to cause a substantial increase in traffic that would adversely affect traffic operations at 10 of the 14 study intersections. This means that either the intersections would continue to operate at levels considered by the San Francisco Planning Department to be acceptable, or the intersection would operate at levels considered unacceptable, but the project would not contribute enough traffic to the intersection for the contribution to be considered significant. The remaining four impacted intersections are discussed below. Possible improvements were coordinated with SFMTA staff.

Improvements to the Mariposa Street/I-280 southbound on-ramp and the Owens Street extension are fully funded, already underway, and expected to be operational in the second half of 2016, well before the proposed project would be completed. With these changes being implemented by others, the proposed project would not have a significant impact at this intersection and there is no need for further mitigation. This intersection is not considered one of the four impacted intersections. (Also see Response TR-18.)

Mariposa Street/Mississippi Street: Signalization was proposed and would mitigate the impact of the proposed project; however, SFMTA staff has determined it does not support signalization at this intersection because it is believed this would encourage additional traffic through the residential neighborhood to the west. Therefore, this mitigation was not considered feasible and the impact would remain significant and unavoidable. (Also see Response TR-17.)

17th Street/Mississippi Street and Mariposa Street/Pennsylvania Street: The project would contribute to unacceptable levels of service (under both existing and cumulative plus project conditions) at these intersections and project proponents have agreed to pay the project's fair share contribution toward the cost of signalizing these intersections, which is based on the project's contribution to congestion at the intersection and would fully reduce project impacts. SFMTA staff has noted that, while feasible and supported by SFMTA staff, even with fair-share contributions from the project, improvements to these intersections have not been prioritized or identified for full funding and therefore implementation cannot be assured. Because implementation of the mitigation is uncertain despite project contributions, the impact cannot be said to be fully mitigated and would be considered significant and unavoidable. (Also see Response TR-17.)

7th/16th/Mississippi Street: The proposed project would also contribute considerably to a significant cumulative traffic impact at this intersection. SFMTA staff has determined no additional improvements would be feasible at this already-signalized intersection because additional or reconfigured lanes would conflict with goals for pedestrian and transit usage of this intersection. Therefore, mitigation at this intersection is not considered feasible and the impact would remain significant and unavoidable. (Also see Response TR-17.)

The project proponents would also implement a TDM Plan (Mitigation Measure M-TR-2c) with a target to reduce project vehicle trips by 10 percent. A higher reduction goal in the mitigation measure was determined to be uncertain for this project site given the current limited amount of data in San Francisco

regarding the effectiveness of certain TDM measures, the voluntary nature of compliance with TDM measures by users of the buildings, and the uncertain feasibility of achieving a greater reduction goal. While it would not avoid the impacts above, implementation of the TDM Plan would help reduce the project's contribution to impacted intersections. (Also see Response TR-20.)

As noted above, impacts would be considered significant and unavoidable, even with project mitigation, at four intersections. CEQA requires consideration of a project's unavoidable environmental risks against other policy goals and allows for certification of an EIR and project approval with a Statement of Overriding Considerations for those impacts demonstrating that the impacts are considered "acceptable" in light of other policy goals (CEQA Guidelines Section 15093). The required Statement of Overriding Considerations would be part of the written CEQA findings that would need to be adopted as part of EIR certification prior to approval of the project (CEQA Guidelines Section 15091). Some comments additionally raise concerns about traffic safety and hazards related to congestion and the addition of traffic. As discussed on page IV.A.41 of the Draft EIR, while the proposed project would add vehicle trips to the surrounding roadways, the project's increase in traffic would not create a major traffic hazard in the area. The potential to result in hazardous conditions due to proposed driveways and related potential queuing was also addressed and is discussed in Response TR-6. The potential to create or contribute to hazardous conditions for pedestrians or bicycles is additionally discussed in Response TR-2.

The videos submitted provide anecdotal evidence of generally congested morning and evening traffic conditions along some of the streets and intersections within two blocks of the project site. In order to evaluate existing baseline conditions and the conditions after implementation of the proposed project, a TIS was prepared according to the Planning Department's Transportation Impact Analysis Guidelines. Existing counts were collected in June 2012 or July 2014 for 14 study intersections. (More recent counts were collected at five of those 14 intersections - see Response TR-13.) Consistent with the Planning Department's Transportation Impact Analysis Guidelines and the City's standard practice, study intersection traffic counts were conducted during the PM peak hour period from 4:00 PM to 6:00 PM, which represents when the maximum utilization of the transportation system occurs. The traffic counts are made at 15 minute intervals. With these counts, the LOS at the study intersections was then calculated using Synchro 8 software and criteria specified by the Planning Department's Transportation Impact Analysis Guidelines and the Highway Capacity Manual. Based on this analysis, the Draft EIR determined that the proposed project would contribute considerably to significant and unavoidable project impacts to three intersections (17th Street and Mississippi Street, Mariposa Street and Pennsylvania Street, and Mariposa Street and Mississippi Street), and cumulative impacts to those same intersections plus one more (the 7th/16th/Mississippi Street intersection). Anecdotal evidence does not change the conclusions of the EIR.

#### **Comment TR-12: Adequacy of the Traffic Analysis**

The DEIR fails to note the current traffic, parking + transit problems and does not come up with any meaningful solutions. (*Gavre, Yvonne, Letter, September 05, 2015*)

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The problems with the DEIR include: 1) Inadequate & Inaccurate Analysis of Traffic, Parking and Transit Impacts (*Glicken, Sarah, E-mail, September 25, 2015*)

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The traffic study referenced in the EIR was grossly inadequate. A traffic study that examined a single day's few hours of PM traffic is not adequate to examine the impact of this project and potential siting of egress or proposed expanding in the public right of way. (*Cpuc, Jci, E-mail, October 04, 2015*)

The analysis of vehicle traffic in the DEIR is inadequate, and fails to evaluate the full impacts of traffic generated by this project. Moreover, the cumulative impact analysis in the Eastern Neighborhoods Plan (ENP) EIR, on which this project's EIR relies, is inadequate as well. (*Meroz, Yoram, Letter, October 05, 2015*)

#### **Response TR-12**

The comments raise concerns that the analysis presented in the Transportation and Circulation section is inadequate because it does not take into account current traffic, transit and parking problems, provides no meaningful solutions, is based on limited data and/or generally fails to evaluate either the proposed project's traffic impacts or its contribution to cumulative traffic impacts.

As discussed in Chapter II of this document, consistent with local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, San Francisco has adopted VMT criteria in place of automobile delay criteria and VMT/induced automobile travel impact analysis is provided in Section IV.A, Transportation and Circulation. However, because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA.

The VMT analysis determined that, based on average daily VMT that is substantially below regional averages, the impact related to VMT would be less than significant.

The TIS for the Draft EIR was prepared according to the Planning Department's Transportation Impact Analysis Guidelines and addresses traffic, transit, pedestrian, bicycle, loading, construction, emergency vehicle access, and parking. The analysis and conclusions, including mitigation considerations, are presented in more detail in Response TR-11. To summarize, the proposed project would significantly impact four intersections. The project would contribute fair share funding to improvements at two of the four impacted intersections (Mitigation Measures M-TR-2a and M-TR-2b) and implement a TDM Plan to further reduce vehicle trips (Mitigation Measure M-TR-2c). These are the standard mitigations for this type of impact under CEQA. However, these impacts at two of the four intersections cannot be determined to be reduced to less than significant levels even though the improvements to which the project is contributing would reach that level, because SFMTA staff has not prioritized these improvements and considers implementation uncertain at this time.

For the other two impacted intersections, potential improvements for vehicle traffic were coordinated with SFMTA staff; however, SFMTA staff does not support the potential mitigation at these intersections because improvements for vehicle traffic would conflict with desired travel patterns by promoting neighborhood cut-through traffic or conflict with transit goals. Therefore, improvements at the intersections would be infeasible and the impacts at these two intersections would also be considered significant and unavoidable. Again, the TDM Plan would reduce the project's impact but not below levels considered significant.

In order to certify the EIR and approve the project, the City will need to make findings to accept the significant and unavoidable impacts (per CEQA Guidelines sections 15091 and 15093) when balancing them against other goals, including those detailed above used by SFMTA staff when determining which improvements to support as well as City-wide and Eastern Neighborhoods area development goals.

Utilization of traffic counts for a weekday PM peak period is consistent with Planning Department's Transportation Impact Analysis Guidelines. Section IV.A, Transportation and Circulation presents the results of the automobile delay assessment in the Draft EIR. Using traffic counts from 2012 and 2014 is also consistent with the Planning Department's Transportation Impact Analysis Guidelines. However, in response to comments that those counts may not reflect current conditions, updated traffic counts were performed in November 2015, a full discussion of which is presented in Response TR-13. Analysis of the updated counts determined that LOS assessments in the Draft EIR remain valid utilizing more updated traffic counts.

Related topics are addressed in more detail in other responses, including use of driveways on nearby streets (Response TR-16), traffic signalization feasibility (Response TR-17), effect on transit (Response TR-1), vehicle and pedestrian/bicycle safety (Responses TR-6 and TR-2), and parking (Response TR-10).

Therefore, given the above as supplemented by referenced responses to related topics, the Draft EIR is consistent with the Planning Department's Transportation Impact Analysis Guidelines and standard practices and meets standards for adequacy of an EIR per Sections 15151 of the CEQA Guidelines.

**Comment TR-13: Traffic, Age of Traffic Data**

I cannot close without mentioning that the Draft Environmental Impact Report (DEIR), which is invoked to allow the project to proceed, is fatally flawed. The data on which it is based are often outdated or erroneous. And when a serious problematic consequence of the project is revealed (e.g., traffic congestion, impact of the Warriors Event Center, etc., etc.), it is simply ignored or noted that there is no feasible mitigation. It is a shocking document! Makes one wonder why they bother if the findings are so easily dismissed. (*Boyd, David, E-mail, September 07, 2015*)

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The corner of 16th Street and Mississippi Streets has become in the last 2 years a mire of traffic that slows to standstill at commute hours in the morning and evening. I am shocked that the Draft EIR was based on data collected in 2012, and not re-evaluated in 2015 for the Draft EIR. That is an inexcusable error that I would suggest be corrected immediately. Any building project that would add to the traffic that already crowds onto 16th and Mississippi Streets should undergo thorough evaluation. The additional traffic which has been generated by the new research facilities, the new UCSF hospital, new apartments and offices of tech companies and start-ups is here to stay. It may even be augmented by a brand new arena in the very near future. (*Anasovich, Philip, E-mail, September 12, 2015*)

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We have been inundated with thousands of new units lately and the old DEIR does not address this in their traffic analysis. Please re-conduct these traffic studies and take into account the recent growth and probable Warriors stadium that is planned. (*Anding, Nancy, E-mail, September 18, 2015*)

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After looking over the EIR provided by Save the Hill, it is apparent that much of the data used to justify all of the proposed development is flawed. While not being an expert, I can attest to the already increased traffic congestion that has taken place. Now during certain times of the day, especially in the late afternoon intersections like Mariposa at Texas, 17th street between Missouri and the 280, and 18th between Missouri and Pennsylvania have already become crowded to the point of gridlock. Not only do cars line up in an attempt to reach the 280, but many drivers ignore traffic rules, block the intersection, and make it impossible to get through. (*Kurash, Ron and Lynka Adams, E-mail, October 02, 2015*)

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Furthermore and inexplicably, traffic data used in the DEIR was gathered on only one day, during only peak evening commute in 2012. It fails to consider the cumulative impact on traffic and parking from recent, present and future developments. In the past four years, the effect on Potrero Hill traffic has been huge. Consider these developments, only a portion of traffic that is to come: 1000 16th St., 1391 16th St, 1601 Mariposa, 88 Arkansas, 1001 17th St. 1169 16th St. (*Baron, Bonnie, E-mail, October 03, 2015*)

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OBSOLETE STUDIES: The Planning Department is relying on the Eastern Neighborhoods Final EIR that is eight years old and is now stale for the environmental review of the current proposal for housing. Some of the studies and research rely on data that is as old as the 2000 census. (*Angles, Sean, E-mail, October 05, 2015*)

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Muni data was from 2011- stale for 2015 document. (*Cpuc, Jci, E-mail, October 04, 2015*)

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After having reviewed all the information available, the proposed EIR documents and attending the Planning Commission meeting on October 1st, I believe that the EIR is based on stale information that does not reflect the site conditions as they have existed from 2013 to 2015. This is particularly apparent in the data on traffic at the intersections of 16th and Mississippi Streets and 17th and Mississippi Streets.

I urge the Planning Commission to reject approval of the EIR at this time, and urge them to seek additional data to amend the deficiencies of the EIR. (*Anasovich, Philip, E-mail, October 05, 2015*)

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I respectfully urge the Planning Commission... to acknowledge the limitations of the traffic data used in the Draft EIR for 901 16th Street and 1200 17th Street.

...Yes, the city is growing and changing because of the tech industry. And so, if our city is focused on the new and progressive, then shouldn't our decisions be made on the newest information and data? Basing traffic decisions on the Mission Bay Environmental Impact Report - a study that is now seventeen years old - hardly seems very digital or high tech. Seventeen years ago we were still using fax machines, and listening to the Spice Girls on our Sony Walkmans.

Seventeen years ago "The Late Show with David Letterman" was still a relatively new show. Just as Mr Letterman has retired this year, I think it's time to retire this Impact Report and begin making decisions on

new buildings and traffic in the Potrero Hill/Mission Bay area by using current data and future development in mind. (*Agor, Vicente, E-mail, October 05, 2015*)

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First, this ginormous project is too big for this neighborhood which is already suffering a total onslaught of luxury apartment building and massive new hospitals which now result in totally predicted CUMULATIVE NEGATIVE IMPACTS which is being routinely ignored by city planning and misrepresented in this flawed draft EIR based of obsolete projections and ignoring the realities of failing grade 'F' transportation and traffic circulation at this location.

...In conclusion, I urge the Planning Department to do a few things:...

(2) Reject this flawed draft EIR. Require fresh traffic impact and transportation studies based on the circulation patterns that have substantially deteriorated since January 2015. (*Dangles, Robert, E-mail, October 05, 2015*)

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By relying on traffic and MUNI studies that were conducted three years ago, when there was markedly less traffic and demand for transit, the existing conditions studied in the DKS study are no longer accurate. Traffic conditions at the eastern edge of the Showplace Square / Potrero Hill area are already impacted and will continue to get worse as that area grows.

The analysis fails to fully account for "past, present, and reasonably foreseeable future projects". The DKS study used entirely outdated growth projections from the 1998 Mission Bay Redevelopment Plan, which bears no relation to actual conditions already being experienced and those that are now anticipated. (*Heath, Alison, E-mail, October 05, 2015*)

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City Planning should conduct additional traffic studies that are more current and robust and consider traffic calming measures. (*Nicholson, Jane, E-mail, October 05, 2015*)

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Before more harm is done with the approval of an oversized, hideous, light-blocking, local-merchant evicting, car-dense, local gridlock-generating, soulless project, based on absurdly outdated and inadequate traffic studies and in violation of the city's commitment to preserve historical buildings and character, I ask that SF not ignore the inadequacies of the current proposed project simply because "we need more housing units". (*Wurtman, David, Letter, undated*)

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The DEIR is inadequate because traffic data used in the draft report was collected on a single day in 2012 during the peak evening commute. The DEIR does not consider data collected over a period of time, or that includes the morning peak commute or a Giants game day. The DEIR also fails to consider cumulative impacts on traffic and parking from recent, present, imminent and long-range development projects.



... it relies on outdated data and a limited study of traffic conditions.

... City Planning should conduct additional traffic studies that are more current and robust. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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I respectfully urge the Planning Commission to acknowledge the limitations of the traffic data used in the Draft EIR, update and expand upon this data to include peak commute times, and project for the cumulative impacts that new and impending developments in this quickly growing area will bring, prioritize a Transit-first policy and ensure the provision of adequate public transportation before approving more large-scale projects in an area already plagued with traffic problems and limited public transportation, respect multiple area plan. (*Miller, Ruth, Transcript, October 1, 2015*)

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So the city is growing and changing, right, because of the tech industry. And so if our city is focused on the new and progressive, then shouldn't our decisions be based -- shouldn't our decisions be made on the newest information and data? Basing traffic decisions on the Mission Bay Environmental Impact Report, as it is in the Draft EIR, a study that is now 17 years old, hardly seems very digital or high-tech. I mean, 17 years ago we were still using fax machines and listening to the Spice Girls on our Sony Walkmans. Well, some of us may have. I believe that 17 years ago, also, that the Late Show with David Letterman was still a relatively new show. Just as Mr. Letterman has retired this year, I think it's time to retire this impact report and begin making decisions on new buildings and traffic in the Potrero Hill/Mission Bay area by using current data and future development in mind. (*Agor, Vicente, Transcript, October 1, 2015*)

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I don't want to be redundant of everyone speaking this evening, so I'll just say that I want to address the traffic. I live two blocks from the madness. The traffic data used in the Draft EIR was collected on a single day in 2012, during the peak evening commute.

...Since we were all here, you know, that night, two weeks ago, September 17th, I've taken it upon myself to document, every day, at different times of the day, the traffic congestion at the intersections of Mississippi Street and 16th and 17th Street, 17th and Mississippi, Mariposa and Pennsylvania Streets, and Mississippi and Mariposa Streets. I have been e-mailing my daily traffic reports to Sarah Jones. Tonight I'm going to e-mail them all to you, each one of you. It's pretty compelling, and you're not really, probably, going to believe how unbelievable it is. It's actually -- it's really dangerous down there. I mean, Kaiser isn't even occupied yet. Most of the live 360 MB is unoccupied. I took a walk there this last Sunday, a long walk, and I spoke with some people that worked in the live MB, you know, those complexes, those huge apartment complexes in Mission Bay. Mission Bay is two blocks from my house. It is -- it's -- it's unoccupied. The majority of Mission Bay is unoccupied. That intersection, I'm sending it to you every single day, different times of the day, and there -- it's quite compelling. (*Jani Musse Transcript, October 1, 2015*)

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I'm not going to address the lack of real understanding of traffic in any of the studies within the last five years, because it is ever changing, and we don't really have a transit authority like MTA following through, because they don't have the money. (*Boss, Joe, Transcript, October 1, 2015*)

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The traffic data, a lot's happened since 2012. It's happened very quickly. I do share some concerns around the year that was used. (*Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015*)

### **Response TR-13**

These comments relate to the age of the traffic survey data and question whether it is too old and does not accurately reflect current conditions.

This response focuses on the age of the traffic data and comparison to current conditions, though the topic of other big projects in the area, including the UCSF Medical Center at Mission Bay and the Warriors Event Center, are specifically further discussed in Response TR-3. Reliance on projections and cumulative growth under the Eastern Neighborhoods Plan and related *PEIR* are discussed in more detail in Response ES-1. A summary of the traffic study analysis and conclusions and discussion of general safety is included in Response TR-11, with further discussion of bicycle and pedestrian safety in Response TR-2.

The TIS relied on traffic counts collected in June 2012, or where none were available for an intersection from that date, on July 2014. The age of the traffic data used is consistent with the Planning Department's Transportation Impact Analysis Guidelines and standard practices.

A full TIS was completed for the Draft EIR and traffic modeling for existing conditions were based on that TIS and not on older studies, such as the Mission Bay EIR or the *Eastern Neighborhoods PEIR*. No data older than that specified above was used for the existing condition traffic analysis. Assessment of automobile delay under cumulative conditions was based on traffic volumes calculated based on existing condition volumes used in the TIS and forecasted growth rates calculated from the *Eastern Neighborhoods PEIR* and compared for consistency with the University of California San Francisco 2014 Long Range Development Plan Environmental Impact Report (UCSF 2014 LRDP EIR).<sup>18</sup>

In response to these comments and to determine whether there have been changes in existing traffic that would affect the assessment of automobile delay, additional traffic counts were collected on November 3, 2015. The complete data and technical memo: *Analysis of Traffic Volumes based on updated counts* is included as Attachment C. Data collection and assessment were focused on intersections experiencing delay from project traffic as well as intersections that may be affected by additional traffic related to the recently opened UCSF Medical Center at Mission Bay. These intersections are:

- 7th/16th/Mississippi Street
- 17th Street and Mississippi Street
- Mariposa Street and I-280 Southbound On-Ramp

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<sup>18</sup> UCSF 2014 Long Range Development Plan Environmental Impact Report, State Clearinghouse Number 2013092047. Certified by the UC Board of Regents on November 20, 2014, available at <https://www.ucsf.edu/cgr/cgr-projects/lrdp>.

- Mariposa Street and Pennsylvania Street
- Mariposa Street and Mississippi Street

The new 2015 traffic volumes were compared with those used in the Draft EIR for the purpose of determining if changes have occurred in travel patterns or traffic volumes in the study area since the original data collection presented in the Draft EIR. Of the intersections studied, only the intersection of 7th/16th/Mississippi Street showed (6%) growth in overall volume, which was mainly seen as an increase to east and west through traffic along 16th Street. This growth could be potentially attributable to an increase in trips to/from the newly opened UCSF Medical Center at Mission Bay, although it may be within the day-to-day variations in traffic volumes along streets. Other intersections showed either the same overall volume of traffic or a reduction in overall traffic volumes of between 8 to 14% as that presented in the Draft EIR. However, even when overall traffic volumes did not increase, some specific movements through the intersections did show growth between the counts presented in the Draft EIR and those taken in 2015. Existing conditions with the addition of the project were modeled using the new counts to determine whether intersection LOS presented in the Draft EIR would change, with the following results.

Utilizing 2015 traffic counts, the intersection of Mariposa Street and Mississippi Street, with the addition of project traffic, would operate at LOS E rather than LOS F as reported in the Draft EIR. This is primarily a result of a reduction in westbound volumes as compared to the previous counts. While the intersection would not be operating as poorly as previously projected, the Project impact at this intersection would remain significant and conclusions in the Draft EIR would remain unchanged for this intersection.

Utilizing 2015 traffic counts, the intersection of 17th Street and Mississippi Street, with the addition of project traffic, would operate better than reported in the Draft EIR: at LOS D rather than LOS F. This is primarily as a result of a reduction in northbound and southbound volumes as compared to the previous counts. While the intersection would not be operating as poorly as previously projected, a cumulative impact would still be projected at this intersection and would remain significant. Therefore, conclusions in the Draft EIR would remain unchanged for this intersection.

There would be no change in LOS for the other three intersections studied based on the updated 2015 traffic counts and Draft EIR conclusions related to those intersection would also remain unchanged.

#### **Comment TR-14: Traffic, Cumulative Impacts, Other Large Projects in Vicinity**

I cannot close without mentioning that the Draft Environmental Impact Report (DEIR), which is invoked to allow the project to proceed, is fatally flawed. The data on which it is based are often outdated or erroneous. And when a serious problematic consequence of the project is revealed (e.g., traffic congestion, impact of the Warriors Event Center, etc., etc.), it is simply ignored or noted that there is no feasible mitigation. It is a shocking document! Makes one wonder why they bother if the findings are so easily dismissed. (*Boyd, David, E-mail, September 07, 2015*)

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Game day traffic is especially challenging. It could take as much as 45 minutes to get to the 280 freeway entrance on Mariposa from only a block and a half away. I speak from experience, I have been in that traffic. (*Engel, Rebekah, Ermico Enterprises, Inc., E-mail, September 28, 2015*)

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When the ballpark was built the neighborhood was assured we would not be impacted by the traffic, I live at Texas between Mariposa and 17th. When there is a game I cannot get out of my driveway. There are speeding vehicles coming down my street trying to avoid the traffic.

Since the UCSF Children's hospital opened traffic in my neighborhood has become a nightmare. The hospital workers take all available street parking spaces by 6 am. I live close to many businesses that have workers who no longer can find parking on the street. (*Gee, Gigi, E-mail, September 28, 2015*)

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With the addition of the project at Dagget Square due to open soon, and the potential for a Warriors stadium to be built in the near future, the traffic and parking around the hill will be untenable. My wife and I joke to others and tell them that now when we leave our house we only go uphill, soon that joke will be NO JOKE. (*Kurash, Ron and Lynka Adams, E-mail, October 02, 2015*)

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We have been protesting this site as well as the site on carolina st for many reasons but the one you all seem to ignore is traffic. I would love to ask everyone at city hall to send a copy of where the people live who work at city hall. When I asked the people at the first cordovan meeting where they lived almost no one lived in San Francisco. You can build high rises until the cows come home but here is no place for traffic. Come to the design center of a morning or evening.....the streets back up all over lower Potrero hill streets. In every direction and the two behemoths being built on the old design center building site as well as the entire city block at Brennan and eighth are unimaginable nightmares not yet inhabited.

...Oh and by the way this doesn't even consider a new basketball venue the new Giants park...read housing, and all that is being built in Dogpatch. (*Meakin, Rita, E-mail, October 03, 2015*)

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There are at least 15 projects that will forever change the neighborhood not in a positive way...traffic is already a nightmare. What took me 5 minutes to go from my home on Wisconsin street to the U.C.S.F. Bakar Center, now is at least 45 minutes and the site that is currently under construction at 16th and 7th is going to make things an even bigger nightmare. (*Sundell, Carol, E-mail, October 03, 2015*)

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Few of the recent large developments have residents yet and our neighborhood is nearing CRITICAL MASS. (*Adams, Lynka, E-mail, October 04, 2015*)

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TRAFFIC GRIDLOCK. Recently with the opening of new UCSF hospitals and launch of new residential buildings, an explosion in vehicle traffic has deteriorated circulation on both 16th Street and 17th Street to unacceptable levels. ... The proposed project will significantly worsen traffic and parking along streets and intersections already plagued by congestion. The imminent opening in late 2015 of the new 453-unit apartment and mixed use Daggett Place and Archstone Potrero complex on 16th Street at Seventh Street — which is directly across from this new proposal— was not accurately evaluated in the obsolete traffic

studies for the further negative traffic circulation and gridlock before this new proposal is properly evaluated by Planning Department. (*Angles, Sean, E-mail, October 05, 2015*)

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An issue I pointed out during the public hearing session, which was repeated by a few other commenters, is the failure of the draft environmental impact report to take into account the potential traffic and parking impact of the Warriors arena that is slated to be built nearby. I believe a member of the Planning Commission touched upon this after the end of the public hearing session on October 1st by pointing out something along the lines that it's not clear how two separate projects in proposal state could take the impact of each other into account in their respective environmental impact reports. While the practical difficulty of this is fairly evident, I believe the core reasoning behind it has an essential weakness. For the sake of example, imagine a scenario where a particular area of the city has a set amount of a certain public resource currently available; say, a maximum excess capacity for 5,000 car trips per day. Let's assume that three different development projects are simultaneously proposed for this area and have environmental impact reports prepared that show each one as adding 3,000 car trips to the area per day. When taken individually, none of the three projects present any overburdening of this resource in this area, clearly. However, if all three projects are approved based on this criterion and get built, what we would end up with is an area that had spare capacity for only 5,000 more car trips per day being choked with an extra 9,000 car trips per day with the full sanctioning of the planning authorities. To me, this is a clear sign that there is a responsibility on the part of the planning system to take into account the overall outlook when evaluating the merit of any individual proposal. From that point of view, I don't believe the considerations arising from the proposed Warrior arena can be left out of the environmental impact report in good conscience, and neither can the impact of other current proposal not represented in the draft report. I believe the list of such disregarded development projects looks like this:

1150 16th Street

1301 16th Street

1001 17th / 140 Pennsylvania

1717 17th Street

88 Arkansas Street

801 Brannan Street

975 Bryant Street

580 De Haro Street

540 – 522 De Haro Street

1601 Mariposa Street

131 Missouri Street

249 Pennsylvania Avenue

98 Pennsylvania Avenue

790 Pennsylvania & 22nd Street

645 Texas Street (*Guney, Ergin, E-mail, October 04, 2015*)

I have many concerns about the impact that this development will have on our neighborhood, but my two greatest regard traffic and PDR businesses.

As it stands now, with UCSF currently operating at not even half capacity, even driving the relatively short distance between my work and home poses an ever-increasing challenge. Throw in a Giants home game and our neighborhood becomes completely gridlocked. This situation has yet to be seriously addressed. (*Angeli-Morse, Audra, Thee Parkside, Dino & Luigi Presents, E-mail, October 05, 2015*)

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The omission of Warriors Arena in cumulative analysis is not justified by the fact that the DEIR for that project was published during the time of the analysis for the 901-16th Street/ 1200-17th Street DEIR. The fact is that it was a reasonably foreseeable future project at the time the analysis was done. (*Heath, Alison, E-mail, October 05, 2015*)

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Nor does it even take into account what would happen on Game days with the Warriors project. I used to live and work in Soma and on Giants game days the congestion caused would cause a 5-10minute drive to take up to 45 minutes, I believe this will be even worse for Dogpatch/Potrero than it was in Soma. (*Horton, Michelle, E-mail, October 05, 2015*)

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Furthermore, the DEIR should include consideration of several large-scale developments that are either underway, in the pipeline, or part of what constitutes a reasonably foreseeable future. While it is understood that planners can not specifically take into account the known impact of a project that is not yet completed, a vital part of planning is projecting and “doing the math” to account for projects underway or forthcoming. Only the 1000 16th Street project is acknowledged, but 1301 16th Street, 1601 Mariposa Street, 88 Arkansas Street, 249 Pennsylvania, 98 Pennsylvania, 1001 17th / 140 Pennsylvania, 790 Pennsylvania & 22nd Street, 580 De Haro Street, 540 – 522 De Haro, 131 Missouri Street, 1150 16th Street, 801 Brannan Street, 975 Bryant Street, 645 Texas Street, and 1717 17th Street should be added to the list of large and dense developments that will overwhelm this area with traffic. It is also not unreasonable to ask that calculations be included to indicate potential traffic impacts of the proposed Warriors arena; these numbers are not unknowable, their potential impacts are not unforeseeable, and planners should acknowledge their responsibility to encourage the developers to prevent negative and unnecessarily egregious impacts on traffic. I respectfully request that more extensive research be committed to the incredibly significant matter of traffic. Furthermore, I specifically request that someone, preferably the author, get back with me to explain the following quote concerning the proposed Warriors Event Center:

(T)he Event Center project would not cause any significant change to the results given in this report and may potentially reduce the percent contribution to the impacted intersection from the proposed project. (page 124, Part 2, Draft EIR, 901 16th St & 1200 17th Street, August 2015)

Even now well before the opening of the 1000 16th Street mega-structure, I regularly witness blocks worth of traffic back-up composed of people jammed behind the CalTrain stop, trying to enter / exit 280, trying to move toward AT&T Park, or simply desperately trying to get elsewhere. (*Miller, Ruth, E-mail, October 05, 2015*)

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The DEIR traffic study grossly underestimates the traffic impact because it does not consider the added traffic from the 4000 plus units that are already in the pipeline for this neighborhood, including the EQR's 453 units directly across the street from the subject project. (*Owen, Kathleen, Bottom of the Hill, E-mail, October 05, 2015*)

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One of my biggest concerns with the Draft EIR is that it relies on outdated reports and data and in doing so, does not take a holistic view of development in Potrero Hill. Here are a few examples:...

In another case of the DEIR relying on outdated data is the exclusion of the impact of the Golden State Warriors stadium. On page 124, Part 2 (of the Draft EIR, 901 16th St & 1200 17th Street, August 2015) it states, "the Event Center project would not cause any significant change to the results given in this report and may potentially reduce the percent contribution to the impacted intersection from the proposed project." This is an absurd statement. First of all it relies – yet again – on outdated data, this time traffic data from 1998 - 2012, and given that the stadium will be 3-4 blocks away, minimizes the impact of traffic in this general vicinity.

I implore the Planning Commission and the city of San Francisco to use updated data and reports and to take a holistic view to make environmental impact decisions on the Corovan site and other future developments in the city. (*Pfeffer Agor, Mike, E-mail, October 05, 2015*)

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What the DEIR Says:

Golden State Warriors Event Center: Due to the relative timing of the proposals, the Warriors' event center project was not included in the cumulative analysis of the proposed project .... (T)he Event Center project would not cause any significant change to the results given in this report and may potentially reduce the percent contribution to the impacted intersection from the proposed project. (page 124, Part 2, Draft EIR, 901 16th St & 1200 17th Street, August 2015)

The passage above is another example of how the DEIR's analysis relies on outdated and inadequate traffic data from 2012 and 1998. The DEIR not only fails to adequately consider and analyze the traffic and parking impacts of the Warriors Arena proposed for 3rd & 16th Streets, it claims that the Warriors Arena might actually help by shrinking the Corovan development's proportional contribution to traffic congestion. This absurd and unsubstantiated argument minimizes one of the most troubling aspects of the project sponsor's proposal.

Finally, the DEIR references only one large development in the area, 1000 16th Street (Daggett), while ignoring many other impactful projects in the pipeline including 1301 16th Street, 1601 Mariposa Street, 88 Arkansas Street, 249 Pennsylvania, 98 Pennsylvania, 1001 17th / 140 Pennsylvania, 790 Pennsylvania & 22nd Street, 580 De Haro Street, 540 – 522 De Haro, 131 Missouri Street, 1150 16th Street, 801 Brannan Street, 975 Bryant Street, 645 Texas Street, and 1717 17th Street. The DEIR should include consideration and analysis from recent, present, imminent and reasonably foreseeable future development projects per CEQA.

... Both the Mission Bay EIR and the recent Warriors Arena transportation report fail to offer adequate mitigations and analysis to reduce increased volume of traffic to and from Potrero Hill from past, present, and reasonably foreseeable future development. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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Unfortunately, the Planning Department's willingness to allow developers to build without proper foresight, is having a negative effect on this and other neighborhoods in the city. There is no doubt about this as we witness the congestion daily at this corner of the City. When I leave my office now, I detour the congestion caused by Planning's approvals at and near 16th and Pennsylvania, only to run into more in another neighborhood nearby.

I have to ask: Are there any philosophers on the Board, or on staff? Anyone who looks at the bigger picture, the long view? Or, are there only business and political leaders making these decisions based on dollars and cents, rather than quality of life?

I suggest you slow down. Slow way down to contemplate the longterm effects of the decisions you make for an entire city. (*Zebroski, Chet, Erickson Zebroski Design Group, Inc., E-mail, October 06, 2015*)

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Whether or not the Warriors move into Mission Bay, the increased level of traffic, congestion, noise, air pollution (our house was recently painted white, and the rapid rate at which that white took on a deep blackening from car and truck-generated soot can only suggest what we as pedestrians, cyclists and locals are breathing in to our bodies) over the past four years that we've lived there speak to a frenzy of development without thoughtful city planning. (*Wurtman, David, Letter, undated*)

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The first of these is about the traffic and parking impact of this proposal. I realize it is a topic that's been beaten to death, but that's essentially what makes it surprising, that the report makes no plan of the Warriors' arena when assessing the traffic and parking impacts of the project. Even today, when there's a baseball game at AT&T Park, this area around the Mariposa exit off I-280 is congested for hours. And this, despite the fact that the ballpark is more than a mile away from that exit. Meanwhile, the proposed location of the Warrior's arena is only four blocks away from the location of this project, and that arena is slated to feature about 18,000 seats with only -- with less than 1,000 parking spaces to go along with those. So it doesn't take much imagination to picture what the traffic and parking situation would be like in this area whenever there's an event there. So for that reason, I think this is a blind spot of the draft report, frankly, that I hope will be fixed in the final version. (*Gurney, Ergin, Transcript, October 1, 2015*)

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As it stands now, with UCSF currently running at half capacity, even driving the relatively short distance between my work and home poses an ever-increasing challenge. Throw in a Giant's home game and our neighborhood becomes completely gridlocked. The situation has yet to be seriously addressed. (*Audra (no last name given), Transcript, October 1, 2015*)

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I respectfully urge the Planning Commission to acknowledge the limitations of the traffic data used in the Draft EIR, update and expand upon this data to include peak commute times, and project for the cumulative impacts that new and impending developments in this quickly growing area will bring, prioritize a Transit-first policy and ensure the provision of adequate public transportation before approving more large-scale projects in an area already plagued with traffic problems and limited public transportation, respect multiple area plan. *(Miller, Ruth, Transcript, October 1, 2015)*

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This project will channel a lot of traffic right into where it -- into -- on freeway traffic is being funneled from the entire hill and neighboring projects. And some of that traffic is going to be pushed, pushed to neighboring streets such as Mariposa which are not evaluated in the area. *(Meroz, Yoram, Transcript, October 1, 2015)*

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The EIR also fails to consider cumulative impacts on traffic and parking from recent, present, imminent and long-range development projects.

...Someone has already mentioned the fact that the Golden State Warriors Event Center isn't even mentioned or wasn't addressed in the EIR. *(Jani Musse, Transcript, October 1, 2015)*

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However, you know, I think much of it is very well done. There's been some comments about analyzing the impacts of the Warrior's stadium. It's pretty hard to analyze something that isn't there yet, and I don't believe that that can be done in the existing EIR until we really know what the true impact will be. *(Commissioner Antonini, San Francisco Planning Commission, Transcript, October 1, 2015)*

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We have the Warriors' arena coming. We don't have the arena built yet. We have an EIR here. We have the EIR probably floating around for other things, too. What is the voice when you have two EIRs that are actually happening kind of at the same time? How does one inform the other -- I'm actually kind of tired -- that is also a concern for me. *(Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015)*

#### **Response TR-14**

The comments raise concerns regarding the methodology used to analyze cumulative transportation impacts and that it should include past, present and reasonably foreseeable future projects, specifically the Golden State Warriors Event Center and Mixed Use Development at Mission Bay Blocks 29-32 (Case No. 2014.1441E), and several upcoming large residential developments in the area.

As described in the Draft EIR (pages IV.5 to IV.7 and IV.A.34 and IV.A.35), the San Francisco County Transportation Authority countywide travel demand forecasting model was used to develop the travel forecasts for development and growth through the year 2025 for the cumulative traffic analysis, based in part on the projections for growth in the *Eastern Neighborhoods PEIR* within that area. This approach resulted in an impact assessment for year 2025 conditions that took into account both the future

development expected in the Eastern Neighborhoods (e.g., development growth in Showplace Square/Potrero Hill Area Plan) and the expected growth in housing and employment for the remainder of San Francisco and the nine-county Bay Area at that time, including growth within Mission Bay. As stated on pages IV.5 and IV.6, the proposed project is consistent with and fits within the growth projections identified in the *Eastern Neighborhoods PEIR* for cumulative conditions, including the expected growth from the various planned and upcoming developments listed within the comments. While residential growth in the Eastern Neighborhoods area is already nearing the *PEIR* 2025 assumptions, other non-residential development is below projections. Because traffic volumes from all types of development are considered together, the City determined continued reliance on Eastern Neighborhoods 2025 traffic volume growth projections remains appropriate.

As stated on page V.4 of the Draft EIR, although the Golden State Warriors project was not specifically covered in the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project Draft EIR because the NOP was issued before the Warriors project at the Mission Bay site was foreseeable. The cumulative conditions were based on forecasted growth in the study area based on the *Eastern Neighborhoods PEIR*, which assumed a land use development at the Golden State Warriors project site in Mission Bay (i.e., the former Salesforce proposal) and was therefore considered in the growth projections. Cumulative conditions were also compared for consistency with the UCSF 2014 LRDP EIR. While there are several overlapping study intersections between the Golden State Warriors project and the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project, only the intersection at 7<sup>th</sup>/16<sup>th</sup>/Mississippi Street was identified as being impacted by both projects. The trips added by the Golden State Warriors project during events that could overlap with weekday PM peak hour traffic were compared to the proposed project's weekday PM peak hour analysis of this intersection (presented in Table IV.A-17 on page IV.A.65 of the Draft EIR) and would increase the baseline cumulative intersection volumes at that intersection, decreasing the percent contribution that the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project would add to the intersection. (When an intersection is projected to be operating below target service levels even without the addition of project traffic, whether a project's contribution would be considerable is determined based on the percent contribution of the project's traffic to the volume of traffic already in the intersection. This is why additional cumulative traffic added to an intersection operating below target service levels would actually lessen the percent contribution of a project's traffic to that intersection.) As a result, the Golden State Warriors project would not cause significant change to the results presented in the analysis presented in the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project Draft EIR.

The proposed project is consistent with its zoning designation and fits within the growth projections identified in the Eastern Neighborhoods Plan as discussed in Responses PO-2 and ES-1. As discussed above, the cumulative analysis methodology utilized in the analysis of automobile delay relies on the cumulative assumptions provided in the *Eastern Neighborhoods PEIR*, which includes the more recent development described by commenters.

#### **Comment TR-15: AM Peak Hour and/or Event Traffic Analysis**

Traffic Study was completely inadequate. Level of Service witnessed in the morning is D,E or F. A study of peak PM 4-6 pm failed to capture morning congestion. (*Cpuc, Jci, E-mail, October 04, 2015*)

I implore planners to update and expand upon the traffic data for the final EIR. Please include peak commute times, ballgame and / or special AT&T events days (which increasingly seem more regular than special) and project for the cumulative impacts that new and impending developments in this quickly growing area will bring. (*Miller, Ruth, E-mail, October 05, 2015*)

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The first of these is about the traffic and parking impact of this proposal. I realize it is a topic that's been beaten to death, but that's essentially what makes it surprising, that the report makes no plan of the Warriors' arena when assessing the traffic and parking impacts of the project. Even today, when there's a baseball game at AT&T Park, this area around the Mariposa exit off I-280 is congested for hours. And this, despite the fact that the ballpark is more than a mile away from that exit. Meanwhile, the proposed location of the Warrior's arena is only four blocks away from the location of this project, and that arena is slated to feature about 18,000 seats with only -- with less than 1,000 parking spaces to go along with those. So it doesn't take much imagination to picture what the traffic and parking situation would be like in this area whenever there's an event there. So for that reason, I think this is a blind spot of the draft report, frankly, that I hope will be fixed in the final version. (*Gurney, Ergin, Transcript, October 1, 2015*)

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That being said, I want to focus on the traffic and what's going on there. I actually walk about three blocks to UCSF gym because I teach there a little bit and also work out there. And I'm telling you, it's hell now. Just getting across that intersection is just unbelievable. God forbid -- I work on the Peninsula. God forbid, I forget to take the Cesar Chavez exit. I live on Mariposa Street, but if, on game day, I miss that Cesar Chavez exit, I'm in traffic for 20 minutes. (*Dwyer, Richard, Transcript, October 1, 2015*)

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The EIR does not consider data collected over a period of time where that includes the morning peak commute or a Giant's game. (*Jani Musse, Transcript, October 1, 2015*)

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### **Response TR-15**

These comments suggest the Draft EIR is inadequate because it fails to analyze AM peak hour traffic or traffic conditions during special events, such as sporting events at AT&T Park or the approved Warriors Event Center.

The TIS referenced in the Draft EIR follows the Planning Department's Transportation Impact Analysis Guidelines for assessment of transportation impacts. Section IV.A, Transportation and Circulation of the Draft EIR presents the results of the TIS. The traffic analysis and conclusions are summarized in Response TR-11.

Consistent with the Planning Department's Transportation Impact Analysis Guidelines, the Draft EIR transportation analysis for the topics of transportation impacts focused on the PM peak period (4 to 6 PM), a period that captures the time when the typical maximum use of the network (by all travel modes) would occur. This peak period represents the period where it is anticipated that the most trips to and from most proposed projects would occur. AM peak hour analysis is generally not conducted on local/unsignalized intersections unless there is the potential for a localized impact (e.g., morning drop-offs with a school). The City's intent for requiring the analysis of the most intense commute period (i.e., the PM peak hour) is that potential off-peak conditions then would also be implicitly included and disclosed as part of PM peak analysis. Upon consideration of the specifics of the proposed project and location as well as these

comments, the City determined analysis of the AM peak hour was not required for the project because the PM peak hour analysis adequately encompasses conditions during the AM peak hour as discussed above.

According to the Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 Subsequent Environmental Impact Report, Warriors games and concerts at the event center or AT&T Park most often occur in the evening (6 to 8 PM), after the typical PM peak period noted in the Planning Department's Transportation Impact Analysis Guidelines (4 to 6 PM). In addition, according to the Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 Subsequent Environmental Impact Report, high attendance events at both the Warriors Event Center and AT&T Park are anticipated to occur, on average, nine times a year, with an additional 23 days anticipated during which events at both facilities would occur.<sup>19</sup> As stated in Response TR-14, the Golden State Warriors project would not cause significant change to the results presented in the analysis presented in the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street Project Draft EIR. Therefore, as discussed above, the analysis of traffic impacts was adequately covered in the Draft EIR and no additional environmental review of this topic is required for the proposed project.

**Comment TR-16: Traffic/Driveways on Nearby Streets**

How much more density can a neighborhood endure? I live on Mariposa St. (one block away from proposed site) and on most days I cannot get out of my driveway safely due to traffic. (*Gavre, Yvonne, Letter, September 05, 2015*)

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I ask you to try to drive down mariposa at 5p today. I then ask what an additional 1000 cars on that street at rush hour will do. (*Goldenberg, David, E-mail, September 11, 2015*)

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Areas that should be revisited are: the garage access and egress on Mississippi Street into what is currently a highly congested commuter route into and from the city... (*Rudolfi, Peter, E-mail, September 15, 2015*)

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Nothing is being done to adequately address the traffic congestion now much less if this new Corovan development happens... Also, cars fly down the southern parts of Mississippi and Pennsylvania getting to Mariposa or to get into the city and it's a huge safety concern for those of us trying to get out of parking spots in the morning, walking our dogs or children to school. (*Horton, Michelle, E-mail, October 05, 2015*)

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It is getting so hard simply to pull in and out of our driveway during weekday business hours that one can only wonder just how poorly this part of the city will function if and when all the slated or approved development projects were to be completed – with 901 16th being the most egregious and being sited in a

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<sup>19</sup> Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 Subsequent Environmental Impact Report. Office of Community Investment and Infrastructure Case No. ER 2014-919-97, Planning Department File No. 2014.1441E, San Francisco Planning Department Case No. 2014.1441E, State Clearinghouse No. 2014112045. Certified November 3, 2015.

location where the most serious harm will ensue. It is not as simple as more is better. (*Wurtman, David, Letter, undated*)

### **Response TR-16**

These comments relate to concerns about traffic on residential streets in the vicinity and the difficulty of persons in their private vehicles to access and leave private driveways on these streets given the existing volume of traffic and the addition of project traffic. As presented on page IV.A.40 of the Draft EIR, the study intersections along Mariposa Street west of I 280 are currently unsignalized (controlled by four-way stop signs) and operating at LOS F conditions under existing and existing plus project conditions. Signalization of nearby intersections can be used to increase the opportunities for driveway access because the cycle of red and green lights would create more gaps in traffic and allow for easier driveway ingress and egress.

As presented on pages IV.A.41 to IV.A.43 of the Draft EIR, signalization was proposed at impacted intersections that are currently controlled by stop signs (three intersections). For two of these intersections, the project sponsor would pay the project's fair share contribution toward the cost of signalizing at the intersections of 17th Street/Mississippi Street and Mariposa Street/Pennsylvania Street (Mitigation Measures M-TR-2a and M-TR-2b) and signalization would fully reduce project impacts. SFMTA staff has noted that, while feasible and supported by SFMTA staff, even with fair-share contributions from the project, improvements to these intersections have not been prioritized or identified for full funding and therefore implementation cannot be assured. Because implementation of the mitigation is uncertain despite project contributions, the impact cannot be said to be fully mitigated and would be considered significant and unavoidable, even though signalization may be implemented in the future. (Also see Response TR-17.) As noted above, signalization could increase opportunities for driveway access along nearby streets by creating more gaps in traffic.

Signalization was also proposed at the third unsignalized intersection, Mariposa Street and Mississippi Street, and would mitigate the impact of the proposed project if implemented. However, SFMTA staff has determined they do not support signalization at this intersection because SFMTA staff does not want to encourage a substantial amount of through westbound movements on Mariposa Street west of Mississippi Street, which a traffic signal could encourage. Because signalization at this intersection would conflict with SFMTA goals and is therefore not supported by SFMTA staff, signalization at this intersection is considered infeasible. (Also see Response TR-17.)

As noted on page IV.A.41 of the Draft EIR (under "Other Traffic Hazards"), while the proposed project would add vehicle trips to the surrounding roadways, the project's increase in traffic would not create a major traffic hazard in the project area that would result in a significant impact of the project. As discussed above, the project would contribute funding toward signalization of two local intersections, which if implemented by SFMTA in the future, would result in regular periods of time when traffic along Mississippi Street and Pennsylvania Street would be stopped. Unlike stop-controlled intersections, where demand is constantly served, signalization would result in gaps in traffic that would make it easier to access and leave private driveways despite increase to overall traffic volume.

### **Comment TR-17: Traffic Mitigation Feasibility**

As the lead agency, the City and County of San Francisco (City) is responsible for identifying and ensuring the coordinated implementation of all project mitigations. The project's fair share contribution, financing, scheduling, implementation responsibilities, as well as the identified lead agency contact and monitoring,

should be fully discussed for all proposed mitigation measures. (*Maurice, Patricia, California Department of Transportation (Caltrans), Letter, September 24, 2015*)

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I can not close without mentioning that the Draft Environmental Impact Report (DEIR), which is invoked to allow the project to proceed, is fatally flawed. The data on which it is based are often outdated or erroneous. And when a serious problematic consequence of the project is revealed (e.g., traffic congestion, impact of the Warriors Event Center, etc., etc.), it is simply ignored or noted that there is no feasible mitigation. It is a shocking document! Makes one wonder why they bother if the findings are so easily dismissed. (*Boyd, David, E-mail, September 07, 2015*)

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After reading the DEIR for the proposed Corovan development at 901 16th, I am saddened that yet another mega housing project, exceeding historical height limits by more than 20 feet with disregard for parking needs, noise reduction and most of all solutions to traffic mitigation may very well slam another pile of, excuse my profanity, shit onto the residents of Potrero Hill. (*Iaconi, Mara, E-mail, September 13, 2015*)

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I also believe that there are considerable adverse impacts from the proposed design by Walden Development that cannot be mitigated. The area of traffic congestion and loss of historical resources are very important in this regard. The EIR does not provide substantial evidence that the adverse effects can be mitigated effectively. (*Anasovich, Philip, E-mail, October 05, 2015*)

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The SFMTA's forecast for the 16th, 7th and Mississippi Street intersection says that intersection will degrade to a service grade "F" by 2035. Why doesn't the Draft EIR adequately address and mitigate these future impacts?

A forecast is like a crystal ball that predicts the future, except in this case we can change the future. If I knew that my family and friends were going to experience an epic fail in 2035, then I would do everything I could to change that future. And I would hope the Planning Commission would do the same. (*Agor, Vicente, E-mail, October 05, 2015*)

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First, this ginormous project is too big for this neighborhood which is already suffering a total onslaught of luxury apartment building and massive new hospitals which now result in totally predicted CUMULATIVE NEGATIVE IMPACTS which is being routinely ignored by city planning and misrepresented in this flawed draft EIR based of obsolete projections and ignoring the realities of failing grade 'F' transportation and traffic circulation at this location. (*Dangles, Robert, E-mail, October 05, 2015*)

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While I believe the issue of historic integrity to be of utmost importance, the issue of traffic congestion is a matter of grave concern, and it is difficult to understand why the traffic study in the DEIR is as inadequate

as it is. While it is good to see that the DEIR acknowledges serious traffic impacts that would be created or exacerbated by the developer's proposal, it is disconcerting to learn how inexcusably limited the "traffic studies" were, and it is mystifying to see no attention given to pre-existing proposed solutions. There is no mention, for example, of any of the traffic reducing proposals raised by SFMTA and Potrero Hill residents for various intersections with Mariposa Street, and there are no proposed requirements of the developers that would mitigate traffic congestion. *(Miller, Ruth, E-mail, October 05, 2015)*

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The DEIR acknowledges that the proposed Corovan project will significantly and unavoidably worsen traffic congestion. It identifies at least four intersections that will be severely impacted. These include:

- 17th & Mississippi Streets
- Mississippi & Mariposa Streets
- Mariposa & Pennsylvania Streets
- 7th/16th & Mississippi Streets.

The DEIR indicates there's currently no way of feasibly mitigating the increased traffic congestion at the above intersections, either due to lack of funding or practicality. *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

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As you heard in an earlier presentation, we've got big issues that really aren't addressed in this EIR, around the 7th and 16th Street intersection, high speed rail, a lot of traffic and circulation issues. *(Woods, Corinne, Transcript, October 1, 2015)*

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Various problems that are addressed in the Draft EIR, especially traffic, as you've heard here, are acknowledged by everyone, but are said to be not amenable through remediation. This seems to me apparently nothing can be done as local residents are simply to suck it up and get on and deal with it. *(Boyd, David, Transcript, October 1, 2015)*

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The SFMTA's forecast for 16th, 17th and Mississippi Street intersection says the intersection will degrade to an "F" by 2035. Why doesn't the Draft EIR adequately address and mitigate these future impacts? So a forecast is like a crystal ball, right, where it can predict the future, except in this case we can change the future. If I knew that my family and friends were going to experience an epic fail in 2035, I would do everything I could to change that future. And I would hope that the Planning Commission would do the same. *(Agor, Vicente, Transcript, October 1, 2015)*

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I read the traffic, read the mitigations. I like what they say. However, there have been a lot of questions and, of course, comments and responses, I'm sure we'll get clarifications on those issues that were raised tonight. (*Commissioner Antonini, San Francisco Planning Commission, Transcript, October 1, 2015*)

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We have similar traffic, significant unavoidable impacts, but we're saying that the mitigations that are there, even though funding has not been identified and presumably there's also potential issues with the MTA approving those, we are saying that those can be used as mitigation against significant unavoidable impacts. So I would just like to see consistency or a description of why those are not inconsistent statements.

...The final point I want to make about the EIR is about mitigations. There were some for transit, and I think there were a couple of others that are less impactful, but we have some significant, unavoidable transit impacts, as an example, and I don't think that we're consistent on using the facts on the ground of feasibility of those mitigations on the -- on their use and their ability to reduce the impacts of significantly unavoidable impacts. So in some cases, we say that there are significant unavoidable impacts and there are mitigations, but they're not going to be able to be analyzed to be able to reduce those impacts because they are unfeasible. Either they cost too much or the MTA has indicated that they will not approve them. And so even though there is a mitigation that could, in the, universe exist, we're not going to analyze that as a mitigation for an impact because the facts in the ground suggests it is not a feasible mitigation.

...I would like to see consistency in how we are using the facts in the ground about whether the mitigations are feasible and whether or not they actually reduce the impacts and could be used in mitigation. (*Commissioner Johnson, San Francisco Planning Commission, Transcript, October 1, 2015*)

#### **Response TR-17**

These comments noted concern that mitigation for congested intersections was not being properly considered or applied and that significant and unavoidable impacts were identified for transit.

As discussed in Chapter II of this document, consistent with local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, San Francisco has adopted VMT criteria in place of automobile delay criteria and VMT/induced automobile travel impact analysis is provided in Section IV.A, Transportation and Circulation. However, because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA.

The VMT analysis determined that, based on average daily VMT that is substantially below regional averages, the impact related to VMT would be less than significant.

As noted in the Draft EIR, mitigation was proposed for the four impacted intersections and coordinated with SFMTA staff. SFMTA staff considered possible mitigation measures for intersections identified as impacts on a project-specific or cumulative basis by the proposed project and issued the "Findings of Feasibility of Traffic Mitigation Measures Proposed for 901 16th Street/1200 17th Street," which is available as part of Case No. 2011.1300E. Improvements to intersections under City jurisdiction can only be made



with SFMTA approval. SFMTA staff findings are detailed in the mitigation discussion of the Draft EIR (pages IV.A.41- IV.A.43, and IV.A.66-68) and summarized by impacted intersection below.

Per CEQA Guidelines section 15126.4, mitigation measures are required only for significant impacts of a proposed project and must be “roughly proportional” to the impact of the project. Because of this constraint, mitigation for intersections not significantly impacted by the project or contribution to mitigation beyond the project’s “fair share” were not considered in the Draft EIR or this response. Note that development impact fees are imposed by San Francisco to address cumulative contributions to city-wide infrastructure. Some of these fees, which will be paid by the project proponents, such as the Transportation Sustainability Fee and the Eastern Neighborhoods Infrastructure Fee, could go toward other transportation improvements.

17th Street/Mississippi Street and Mariposa Street/Pennsylvania Street: The project would contribute to unacceptable levels of operation (under both existing and cumulative conditions) at these two intersections and project proponents would pay the project’s fair share contribution toward the cost of signalizing these intersections (Mitigation Measures M-TR-2a and M-TR-2b), which would reduce project impacts. SFMTA staff has noted that, while feasible and supported by SFMTA staff, even with fair share contributions from the project, improvements to these intersections have not been prioritized or identified for full funding and therefore implementation cannot be assured. Because implementation of the mitigation is uncertain despite project contributions, the impact cannot be said to be fully mitigated and would be considered significant and unavoidable.

Mariposa Street/Mississippi Street: Signalization was proposed and would mitigate the impact of the proposed project; however, SFMTA staff has determined they do not support signalization at this intersection because it is believed this would encourage additional traffic through the residential neighborhood to the west. Without SFMTA support, mitigation at this intersection cannot be implemented so is considered infeasible and the impact would remain significant and unavoidable.

7th/16th/Mississippi Street: The proposed project would also contribute considerably to a significant cumulative traffic impact at this intersection. SFMTA staff has determined no additional improvements would be feasible at this already-signalized intersection because additional or reconfigured lanes to improve vehicle traffic would conflict with goals for pedestrian and transit usage of this intersection. Without SFMTA support, mitigation at this intersection cannot be implemented so is therefore considered infeasible. Thus, the impact would remain significant and unavoidable.

The project proponents will also implement a Transportation Demand Management (TDM) Plan (Mitigation Measure M-TR-2c) with a target to reduce project vehicle trips by 10 percent and thereby reduce the project’s contribution to impacted intersections. While it would not avoid the impacts above, implementation of the TDM Plan would help reduce the project’s contribution to impacted intersections. A higher reduction goal in the mitigation measure was determined to be uncertain for this project site given the current limited amount of data in San Francisco regarding the effectiveness of certain TDM measures, the voluntary nature of compliance with TDM measures by users of the buildings, and the uncertain feasibility of achieving a greater reduction goal. (Also see Response TR-20.)

As noted above, impacts would be considered significant and unavoidable, even with project mitigation, at four intersections. CEQA requires consideration of a project’s unavoidable environmental risks against other policy goals and allows for certification of an EIR and project approval with a Statement of Overriding Considerations for those impacts demonstrating that the impacts are considered “acceptable” in light of other policy goals (CEQA Guidelines Section 15093). Required Statement of Overriding

Considerations would be part of the written CEQA findings that would need to be adopted as part of EIR certification prior to approval of the project (CEQA Guidelines Section 15091).

The Draft EIR did not identify significant and unavoidable impacts regarding transit. The mitigations that were not approved by SFMTA staff were in connection to traffic impacts identified in the Draft EIR, and any improvements not approved by SFMTA staff were clearly labeled as such and the relevant impacts identified as significant and unavoidable based on a lack of feasibility.

**Comment TR-18: Mariposa Street/I-280 Southbound On-ramp and the Owens Street Extension**

Caltrans requests further details of an updated timeline, financing, and implementation responsibilities of the signalization at the Mariposa Street and I-280 southbound on-ramp intersection for our review. The DEIR states that the signalization of this intersection will be implemented by the Mission Bay South Infrastructure Plan and completed by December 2015 (pg. IV.A.41). (*Maurice, Patricia, California Department of Transportation (Caltrans), Letter, September 24, 2015*)

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I respectfully urge the Planning Commission... to acknowledge the limitations of the traffic data used in the Draft EIR for 901 16th Street and 1200 17th Street.

...Yes, the city is growing and changing because of the tech industry. And so, if our city is focused on the new and progressive, then shouldn't our decisions be made on the newest information and data? Basing traffic decisions on the Mission Bay Environmental Impact Report - a study that is now seventeen years old - hardly seems very digital or high tech. Seventeen years ago we were still using fax machines, and listening to the Spice Girls on our Sony Walkmans.

Seventeen years ago "The Late Show with David Letterman" was still a relatively new show. Just as Mr Letterman has retired this year, I think it's time to retire this Impact Report and begin making decisions on new buildings and traffic in the Potrero Hill/Mission Bay area by using current data and future development in mind. (*Agor, Vicente, E-mail, October 05, 2015*)

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This Corovan Project is of great concern to all of us who live in this area. The rush hour traffic is out of hand already in this highly congested area. A new freeway ramp should be built due to the increase of the UC hospital, ballpark and all the new apartment buildings that have been built within the last 5 years. (*Hill, MG, E-mail, October 05, 2015*)

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The DEIR perpetuates the false claim that traffic impacts caused by the Corovan project to the I-280 on and off ramps at Mariposa Street will be significantly lessened through various mitigations – for example, new traffic signals and the expansion of Owens Street to connect Mariposa and 16th Street. These so-called mitigation measures were identified in the Mission Bay Environmental Impact Report – a study that is now 17 years old and outdated. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

**Response TR-18**

These comments relate to reliance on the Mission Bay EIR and specifically mitigation originally identified in that report, as discussed below. To clarify, the Draft EIR analysis did not rely on the analysis in the Mission Bay EIR. The traffic volumes used in the cumulative analysis were compared to the UCSF 2014 LRDP to check for consistency. As discussed in Response TR-11, a full TIS was prepared for the proposed project using traffic counts performed in 2012 or 2014. Analysis using updated counts performed in 2015 is discussed in Response TR-13.

Improvements to the Mariposa Street/I-280 southbound on-ramp and the Owens Street extension have been fully funded by the Mission Bay project and construction is underway and nearing completion. Updated estimates are for construction to be completed in the second half of 2016. Even if delays are encountered, it can be reasonably assumed that this improvement will be operational well before the proposed project is operational. Accordingly, these improvements are assumed in traffic projections in the Draft EIR. While these improvements were originally identified as mitigation for the Mission Bay project in the Mission Bay EIR, the assumption that these improvements will be in place was made based on the current status of these improvements as described above, and not based on the analysis in the previous EIR.

To clarify the cumulative automobile delay analysis approach, the following text is added (in double-underline) on page IV.A.35 of the Draft EIR:

The 2025 Cumulative Conditions traffic volumes have been developed from the existing condition volumes used in the TIS and forecasted growth rates calculated from the ~~and cumulative intersection turning movement volumes for the Eastern Neighborhoods PEIR and compared for consistency with the University of California San Francisco 2014 Long Range Development Plan Environmental Impact Report.~~<sup>32</sup> For intersections not included in the *Eastern Neighborhoods PEIR*, the annual percent growth rate for intersection turning movement volumes between the existing and Cumulative Conditions analysis years have been determined. This annual percent growth rate has been applied to the observed 2013 turning movement volumes to determine the 2025 Cumulative Conditions turning movement volumes. Pedestrian, bicycle, and construction impacts are also discussed. Due to cumulative growth in the area, demand for on-street parking and loading conditions would likely increase. However, demand for parking and loading at the project site would be largely site specific and provision of off-street parking or loading space would remain similar to Existing Plus Project conditions. As any changes to on-street conditions would not be directly related to the proposed project under Cumulative Conditions, these topics are not discussed in the cumulative discussion.

Footnote:

<sup>32</sup> UCSF 2014 Long Range Development Plan Environmental Impact Report, State Clearinghouse Number 2013092047. Certified by the UC Board of Regents on November 20, 2014, available at <https://www.ucsf.edu/cgr/cgr-projects/lrdp>.

These revisions do not change the analysis or conclusions of the Draft EIR. These changes are fully detailed in Section V of this document.

**Comment TR-19: More Traffic Signals**

Four way stop signs are currently every other block which confuses visitors and makes it nearly impossible for cars entering from side streets without 4 ways to make it across the road. As much as I hate to see traffic lights come to my neighborhood they should be a necessity in the near future. (*Adams, Lynka, E-mail, October 04, 2015*)

**Response TR-19**

This comment suggests replacing four way stop signs with traffic signals.

The TIS completed for the project (and summarized in Section IV.A, Transportation and Circulation) includes an analysis of whether traffic signals are warranted for currently unsignalized study intersections using California Department of Transportation signal warrant criteria. As determined through this analysis, signal warrants were met for three currently unsignalized study intersections and traffic signals were proposed as mitigation for these intersections with the following conclusions, as discussed below.

Mariposa Street/Mississippi Street: As noted on page IV.A.12 of the Draft EIR, signal warrants are met under existing conditions and the potential for signalization of this intersection was coordinated with SFMTA staff. SFMTA staff has determined they do not support signalization at this intersection because it is believed this would encourage additional traffic through the residential neighborhood to the west. The signal cannot be implemented without SFMTA support and therefore, signalization is not considered feasible at this intersection.

17th Street/Mississippi Street: As noted on pages IV.A.40 through IV.A.43 of the Draft EIR, the signal warrant would be met at this intersection under existing plus project conditions and the potential for signalization of this intersection was coordinated with SFMTA staff. SFMTA staff has agreed that signalization at this intersection is both warranted and feasible, but SFMTA has not identified funding for this improvement. As automobile delay is not considered an environmental impact, the project is not required to provide mitigation at this intersection.

Mariposa Street/Pennsylvania Street: As noted on pages IV.A.40 through IV.A.43 of the Draft EIR, the signal warrant would be met at this intersection under existing plus project conditions and the potential for signalization of this intersection was coordinated with SFMTA staff. SFMTA staff has agreed that signalization at this intersection is both warranted and feasible and the project proponents have agreed to contribute to these improvements. (See Response TR-6 for a discussion of CEQA requirements that contributions toward mitigation to be proportional to the impact.)

See also Response TR-17 for further discussion of intersection improvement feasibility.

**Comment TR-20: Effectiveness of the TDM Plan**

The Draft TIS states the project will include a Transportation Demand Management Plan that will provide a comprehensive strategy to reduce estimated one-way vehicle trips by 10 percent (pg. IV.A.44). We commend the City's Mitigation Measure M-TR-2c, which provides a number of TDM strategies that will promote mass transit use thereby reducing regional vehicle miles traveled and traffic impacts. We further concur with the TDM Plan's required monitoring reports to demonstrate the strategies' effectiveness. This smart growth approach is consistent with MTC's Regional Transportation Plan/Sustainable Community Strategy goals of both increasing non-auto mode transportation, and reducing per capita vehicle miles

traveled by 10 percent each. (*Maurice, Patricia, California Department of Transportation (Caltrans), Letter, September 24, 2015*)

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- In addition to signalization, the DEIR proposes a Transportation Demand Mitigation plan, which relies on education and other voluntary measures to reduce vehicle trips in and out of the project (M-TR-2c, p. IV.A.44). There is no indication in the DEIR that such a program will be effective, or that similar programs have proven effective elsewhere. The only enforcement of its effectiveness is a requirement for a change in plan after three consecutive months of ineffectiveness. There is nothing to show what an effective alternative would be. With that in mind, there is no convincing mitigation measure in the DEIR for the traffic impacts of the proposed project. (*Meroz, Yoram, Letter, October 05, 2015*)

### **Response TR-20**

These comments commend the TDM Plan and question the adequacy of mitigation to address traffic impacts in the Draft EIR.

As noted in the Draft EIR (pages IV.A.44 and -45), the TDM Plan trip reduction is a goal and not an absolute requirement due to the voluntary nature of compliance with TDM measures by users of the buildings and the uncertain feasibility of some measures. Note that contrary to contentions in the comment, adjustments would occur after three consecutive monitoring periods. Monitoring, as described in the Draft EIR, is in place to demonstrate that the TDM measures show a trend towards the established goals. The transportation demand management components provided in Mitigation Measure -TR-2c include, but are not limited to, education and marketing of transportation options; on-site safety strategies; subsidies for transportation options other than the single occupancy vehicle; providing additional car-share or bicycle parking; and increasing the cost of vehicular parking. These (and other) components have been employed elsewhere and, in a number of cases, evaluated and found to be effective in reducing single occupancy vehicle use and congestion.<sup>20</sup>

The stated 10 percent reduction is a “performance standard,” meaning the standard by which performance of the measures are judged. The effectiveness of specific measures incorporated into the TDM Plan need not be pre-determined, but rather can be judged against the applied performance standard once implemented. Performance standards are commonly used in circumstances where a target can be reached in multiple ways and/or the effectiveness of measures would need to be determined on a site and project specific basis. While a 10 percent reduction due to the TDM Plan is believed to be feasible given the effectiveness of existing TDM Plans in San Francisco, such a reduction is not assured to be reached and was not assumed in analysis projections and conclusions.

The Draft EIR and related TIS identified significant and unavoidable impacts at four study intersections: Mariposa Street/Mississippi Street, 17th Street/Mississippi Street, Mariposa Street/Pennsylvania Street, and 7th/16th/Mississippi Street. As discussed on page IV.A.45 of the Draft EIR, even assuming effectiveness of the required TDM Plan (Mitigation Measure M-TR-2c) to reach the target 10 percent reduction in project

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<sup>20</sup> See, for example, the U.S. Department of Transportation Federal Highway Administration Office of Operations “Known Effectiveness of TDM Strategies” website: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/chap10.htm>, accessed 2/2/2016. See also the Victoria Transport Policy Institute Online TDM Encyclopedia website: <http://www.vtpi.org/tdm/index.php>, accessed 2/2/2016.

vehicle trips, significant intersection impacts would not be reduced to levels of less than significant and the impacts at these intersections would remain significant and unavoidable. Feasibility of intersection improvement mitigation to reduce these significant impacts is further discussed in Response TR-17 of the project.

#### **Comment TR-21: Impact of Proposed Mitigation on Traffic**

•The proposed project is situated near the Mariposa St. 280 onramp and offramp, which funnel vehicle access to and from the peninsula for parts of Potrero Hill, Mission Bay, SOMA and the Mission. Vehicle access to the project's parking will be through a single driveway on Mississippi St., which is currently a high-traffic area. In the DEIR, three intersections are determined to suffer a significant congestion impact from the project (17th/Mississippi, Mariposa/ Pennsylvania, Mariposa/Mississippi; impact TR-2, p. IV.A.41). This impact is to be mitigated by signalization at 17th/Mississippi and at Mariposa/Pennsylvania. While signalization will improve congestion at these intersections by slowing down traffic, its inevitable result will be to push such additional traffic into neighboring streets

In particular, excess traffic has the potential of backing up Mariposa St., and may interact unfavorably with approaches to Live Oak and International Academy schools, on Mariposa between Carolina and Arkansas. This potential impact on areas further afield has not been studied in either this DEIR or the ENP EIR. (Meroz, Yoram, Letter, October 05, 2015)

#### **Response TR-21**

The comments raise concerns that the proposed signalization of the intersections of 17<sup>th</sup> Street/Mississippi Street and Mariposa Street/Pennsylvania Street have the potential to move additional traffic to neighboring streets and potentially increase congestion along Mariposa Street and affect Live Oak School and International Academy schools. Note that contrary to contentions in the comment, vehicles would have ingress and egress to the 16<sup>th</sup> Street and 17<sup>th</sup> Street buildings via two separate parking garage ramps (not one) along Mississippi Street.

The intersections included for analysis of the proposed project's traffic impacts were identified within the project area based on criteria developed by the Planning Department and included in the TIS prepared for the project. In scoping for the TIS, intersections selected for analysis include the intersections adjacent to the project site and key intersections to the west and east providing access to and from the nearby US-101 and I-280 freeways where the project could result in or contribute considerably to significant impacts. The analysis represents a reasonable representation of project trips through intersections in the project vicinity and of the probable transportation impacts of the project. Further from the project site, project vehicle traffic would be dispersed among numerous streets and contributions to the intersections further away are decreased to a level that significant impacts would not occur. Therefore these further intersections, including Mariposa Street between Carolina and Arkansas streets, are not included in the analysis.

The project would contribute to unacceptable levels of service (under both existing and cumulative conditions) at the intersections of 17th Street/Mississippi Street and Mariposa Street/Pennsylvania Street and project proponents would pay the project's fair share contribution toward the cost of signalizing these intersections (Mitigation Measures M-TR-2a and M-TR-2b). SFMTA staff has noted that, while feasible and supported by SFMTA staff, even with fair-share contributions from the project, improvements to these intersections have not been prioritized or identified for full funding and therefore implementation cannot be assured for either intersection. Because implementation of the mitigation is uncertain despite project contributions, the impact cannot be said to be fully mitigated and would be considered significant and

unavoidable. (Also see Response TR-17.) However, because the signalization was proposed as mitigation and could be implemented at these intersections in the future, the TIS modeled the traffic conditions with implementation of signalization at these intersections, as included in Appendix F of the TIS and summarized for the subject intersections on pages IV.A.42 through IV.A.44 and IV.A.67 to IV.A.68. The commenter is correct in noting that signalization of these intersections may reduce the desirability of travel through the improved intersections and may lead to dispersal of traffic through neighborhood streets. SFMTA staff noted this as a reason for determining it is not desirable to signalize the Mariposa/Mississippi Street intersection. For the noted intersections of 17th Street/Mississippi Street and Mariposa Street/Pennsylvania Street, existing traffic would be expected to disperse further from the project site and contributions to the intersections further away are decreased to a level that significant impacts would not occur.

#### **Comment TR-22: Train Grade Crossing**

No consideration was given of Caltrain and the impact on traffic and safety of the at grade crossing.

... If a proper traffic study is attempted be sure to study the impact of the closed rail crossing and traffic flow for example between originating 4th St station and 22nd St there are 3 trains in ten minutes during morning commute ( at 22nd at 7:19 am, 7:24 am and 7:29 am). The traffic study is not adequate given the project is across street from major 16th Street at grade Caltrain crossing.

...Any traffic study has to ensure no persons or vehicles get caught on the tracks due to blocking for example south bound Mississippi.

Mississippi north bound is generally problematic with the morning peak and as mentioned above exacerbated by adjacent heavy rail transit CALTRAIN crossing. (*Cpuc, Jci, E-mail, October 04, 2015*)

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As you heard in an earlier presentation, we've got big issues that really aren't addressed in this EIR, around the 7th and 16th Street intersection, high speed rail, a lot of traffic and circulation issues. (*Woods, Corinne, Transcript, October 1, 2015*)

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The nearby existing Caltrain rail crossing at 16th Street presents a huge impact with gridlock when the crossing gates come down for trains passing. (*Angles, Sean, E-mail, October 05, 2015*)

#### **Response TR-22**

The comments raise concerns that the Caltrans crossing of 16<sup>th</sup> Street at Mississippi Street was not adequately considered in the Draft EIR. LOS analysis is conducted in order to ascertain the average delay experienced by drivers in a single signal cycle. The Caltrain schedule shows seven northbound crossings and 10 southbound crossings during the two-hour peak period, approximately two-thirds of which were observed to occur concurrently, which would result in 12 crossing events over the two-hour peak period. Based on a cycle time of 90 seconds, there are 80 cycles that occur during the two-hour peak period resulting in approximately 15% of cycles affected by the Caltrain crossing during that time. As the at-grade crossing relates to traffic and potential safety issues, the Draft EIR states on page IV.A.16 that the at-grade crossing is coordinated with the 7<sup>th</sup>/16<sup>th</sup>/Mississippi Street signalized intersection and given the potential

for simultaneous northbound and southbound crossings, the actual percentage of affected cycles would be even less. In order to confirm that the crossing does not affect multiple signal cycles, as stated on page IV.A.11, observations made during the PM peak period showed that queueing caused by the closed rail crossing were able to dissipate within one signal cycle. Based on the low frequency of Caltrain crossings and the lack of observed persistent effect, the delay added by the crossing was not included in the LOS analysis consistent with the methodology outlined in the Planning Department's Transportation Impact Analysis Guidelines. While momentary delay may result when the rail-crossing arm is lowered, there is not a lasting effect on the traffic network or the potential for a vehicle to be caught on the tracks. In response to comments about persons or vehicles getting stuck on the tracks, existing signage and crossing arms are in place to minimize the potential for significant hazards related to getting stuck on the tracks from occurring.

Also see the related response to topic NO-2 discussing noise implications of the at-grade crossing and train horns.

**Comment TR-23: Potential I-280 Teardown**

How will the possible tear down of the 280 Freeway impact this Project? (*Hong, Dennis, E-mail, October 05, 2015*)

**Response TR-23**

This comment questions how the potential for removal of I-280 in San Francisco would impact the project. As noted on page IV.A.35 of the Draft EIR, removal of the northern section of I-280 is under consideration to reconnect the Mission Bay neighborhood to the rest of the city, increase park space and land available for development, as well as to facilitate construction of the California High Speed Rail project. However, as the rail project itself is preliminary and design alternatives are still under consideration, and further feasibility analyses would have to be conducted, it is currently unknown if or how this change to the circulation system would occur. It would be speculative to include this project in the cumulative analysis; therefore, removal of I-280 is not considered. As noted in CEQA Guidelines section 15145, environmental analysis need not engage in evaluation that is too speculative. If such a freeway removal project were proposed at some point in the future, it would require its own project-specific environmental analysis prior to approval and implementation.



## D. HISTORIC ARCHITECTURAL RESOURCES

The comments and corresponding responses in this section cover topics in Section IV.B, Historic Architectural Resources, of the Draft EIR. These include topics related to:

- Comment CP-1: Historic Determination for the Metal Sheds
- Comment CP-2: Impact of the Project on the Historic Brick Office Bldg

### **Comment CP-1: Historic Determination for the Metal Sheds**

The Alternative addresses the historic buildings which exist on the site, and proposes to re-purpose these structures in an exciting and imminently feasible way. I realize that the Planning Department found them not worthy of historic designation, but that is their error and shortsightedness. (*Anasovich, Philip, E-mail, September 12, 2015*)

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Those existing Corovan buildings have historical significance as a former ship repair facility. (*Rudolfi, Peter, E-mail, September 15, 2015*)

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The problems with the DEIR include:...6) Inadequate and Inaccurate Study of Historic Buildings (*Glicken, Sarah, E-mail, September 25, 2015*)

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The DEIR does not accurately address the historic importance of the existing structures. These are the last remaining structures of Pacific Rolling Mill and successor companies, Judson-Pacific, and Judson-Pacific-Murphy. Pacific Rolling Mill was the west's first iron and steel producing foundry. Pacific Rolling Mill and successor companies produced steel for landmark buildings and structures such as the Ferry Building, Grace Cathedral, Flood Building, State Capitol in Sacramento, Golden Gate Bridge, and Bay Bridge, among others. (*Baron, Bonnie, E-mail, October 03, 2015*)

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Speaking of comments made by the commissioners after the hearing on October 1st, I believe it was commissioner Dennis Richards who mentioned during his comments an interest in sorting out the convoluted story of the historic designation of the metal buildings currently on this site. As a long- time resident of the neighborhood, I've had the chance to follow the story of this site ever since the development proposal for this location used to be a Kaiser facility. I believe it's widely known that all the structures at this site were originally designated as historic. It's also no secret that the 2011 report by Page & Turnbull is the reason this designation was changed, leaving merely the small, brick office building on the site with any historic significance. The part of the story that is crucial to understand in order to make sense of the story of the historic status of these buildings is that Page & Turnbull was hired by lawyer Steve Vettel who, in turn, was hired by Josh Smith of Walden Development as part of his appeal of the original historic designation. It's, therefore, a bit too convenient that the new report about the historic status of these

buildings sponsored by Walden Development reached a conclusion that is completely in line with the interests of Walden Development. According to accounts I've heard, this appeal passed the Historic Preservation Committee by being buried in an enormous package of property items that went before the committee as a single motion.

I don't expect the Planning Commission to simply take my word about the story as to how the historic status of the buildings on this site were changed. On the contrary, I would strongly urge the committee to verify this through their own means, which should not be difficult to do at all. *(Guney, Ergin, E-mail, October 04, 2015)*

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No one questions the fact that Victorian housing deserves to be protected from demolition but warehouse structures should also be considered for their historic and functional value and they can service far more people in far more ways than a Victorian house would. The buildings at 901 16th and 1200 17th Streets have much more going for them than any of the workspaces I know of in terms of history and unique industrial attributes. *(Gemignani, Michael, Paragon Frames, E-mail, October 05, 2015)*

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These buildings have historic significance and I believe design should be incorporating that. *(Horton, Michelle, E-mail, October 05, 2015)*

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Prior to attending the hearing, Page & Turnbull completed our own research and determined the brick Administration Building to be the only historic building remaining on the site. We also studied the existing corrugated sheds and found that they have been significantly altered over time and do not retain integrity. *(Kiernat, Carolyn, Page & Turnbull, Letter, October 05, 2015)*

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The Metal Shed Plan has a reasonable scale which compliments the neighborhood and preserves historic structures, all that remain of Pacific Rolling Mill's 80 year history in our neighborhood. Pacific Rolling Mills was the first iron & steel foundry in the West, associated with the industry's rise following the Civil War. At the turn of the century with the advent of steel farm buildings, the Mill was an important part of rebuilding San Francisco after 1906's earthquake & fire. The company played a crucial role in building the Ferry Building, Grace Cathedral, the Golden Gate & Bay Bridges, and SF General Hospital. The Mills was one of the first Potrero Hill industries, drawing workers who built homes nearby.

Katherine Petrin's detailed study determined that the Corovan site's buildings are historic and deserve preservation; I agree completely. The draft E.I.R. found that alterations in the Rolling Mills metal buildings excluded them from historic preservation. This is ridiculous; by their nature industrial buildings are altered when the need arises. Do extensive alterations make City Hall and the Ferry Building any less historic? *(Linenthal, Peter, Potrero Hill Archives Project, E-mail, October 05, 2015)*

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- The proposed project calls for the demolition of three metal-clad industrial buildings, some dating back to the 1900s. The DEIR has concluded that the metal buildings have no historical value, based on the condition of one of them, the Pacific Rolling Mill buildings, dating to the 19th century but modified in the late 1940s. These modifications are now 70 years old, incidentally the age of the Victorians demolished during the redevelopment of the Fillmore district in the 1960s.

The so-called “industrial style”, a distinct combination of corrugated metal, peaked roofs and other elements, has for a long time provided an architectural vocabulary and an element of marketing for new structures on and near the 16th St. corridor. Non-industrial buildings of that style go back at least to the commercial “blue building” at De Haro and 16th, built in the 1980s, and includes recent residential projects at De Haro and 16th, and mixed-use residential buildings at 17th and Rhode Island (Whole Foods and the Sega buildings), at Arkansas and Mariposa, at Mississippi and 17th, and elsewhere. Even the project proposed here includes a new sliver of corrugated metal construction at 17th and Mississippi, amounting to about 3% of the total area of the original metal clad-building.

On the other hand, representatives of the original metal industrial buildings are rare, and becoming rarer. Other than the Corovan buildings of this project, the only substantial example in this corridor is the Center Hardware building (935 Mariposa), dating to the 1950s, and itself subject to possible demolition in the near future. (*Meroz, Yoram, Letter, October 05, 2015*)

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I live near the site in question, and I first became interested in the structures at this site in 2002 and at the same time that I took interest in other industrial structures that have since been torn down. The buildings piqued my curiosity and I took it upon myself to learn more about their history, which is fascinating, original and deeply significant to San Francisco’s history. Among the many things I have since learned is that these structures are the only remaining buildings associated with the storied Pacific Rolling Mill Co. (there had been a site at Pier 70, which has since been destroyed, and there was a location in current day Emeryville which has also been destroyed). I mention this in relation to what is an oversight of the DEIR: its lack of consideration to the structures’ historic importance.

As an educator of art and architecture and someone who is particularly interested in local preservation examples, I am familiar with and have the utmost respect for the work of Christopher VerPlanck. However, I respectfully but strongly disagree with his assessment of the metal structures at this site, and this is an area I would like to be examined by the EIR and the Planning Commissioners. VerPlanck’s assessment reversed an earlier professional determination and conflicts with a later professional determination submitted by Katherine Petrin. Furthermore, it is an assessment that was prompted by Walden Development (Josh Smith) and Mr. Smith’s lawyer and summarily buried in a document that eluded community scrutiny. The architectural details on which the questions of historic integrity can hinge vary considerably amongst architectural types. It is imperative that industrial architecture, about which I have read many a book, be considered on its own terms and in relation to the function it serves. It is the very nature of industrial architecture that it be modified in various ways so as to best serve its workers and purpose, and thus it is unremarkable that some change occurred in the metal structures at this site. More important, the most significant changes that have been theorized (for which there is no photographic evidence) is the suggestion that some of the metal structures had been open sheds and were later covered. But visual evidence indicates that the covered areas in question were in place well within the period of significance (1899-1947). The possibility of them having been changed from open to closed is a moot point in regards to historical integrity.

The structures of the 901 16th and 1200 17th Street site still maintain the distinctive roof and the majority of the signature features they possessed during the period of the steel-making company's greatest significance. The essential forms and massing are intact, and as Katherine Petrin's report indicates the original window sash, transoms, clerestories, and doors are still in evidence; they have merely been covered up.

I respectfully request that Planning Commissioners review the well-researched information that is available on this subject so that you may make the most informed decision on the matter of historic integrity. As has been noted before, the industrial structures that make up the Corovan site were part of what was once the largest steel-production factory on the West Coast and they played a direct role in the construction of some of our most historically significant monuments and buildings. The site holds a unique role in our neighborhood's history, one that would best be acknowledged through adaptive reuse of the metal structures. *(Miller, Ruth, E-mail, October 05, 2015)*

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I have reviewed the Walden/Prado premises at 901 16th Street including the metal sheds, the historic brick building on 17th Street, and the Walden/Prado plans for their proposed project.

In my opinion, the tin sheds are very common gabled structures that are everywhere and are still made happily today. They have little historic value.

As for the brick building... Meh. *(Orton, Eddie, Orton Development, Inc., Letter, October 05, 2015)*

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In 2013, I was requested by Save the Hill to provide professional consulting services as an Architectural Historian and Preservation Planner with regard to whether the Pacific Rolling Mills site retains sufficient integrity to convey its significance as a historic resource for purposes of the California Environmental Quality Act (CEQA).

It was my finding that overall, the complex retains many key elements of the original construction, its plan, forms, massing, proportions, architectural vocabulary, and its overall expression of a large-scale industrial operation. Because the complex retains these elements, it is sufficiently intact to convey its historical association with the Pacific Rolling Mills Company and to convey enough of its historic character to be recognizable as a historic resource. The site's metal shed components, together with the brick office building, comprise the historic resource and are subject to the protections afforded by CEQA. *(Petrin, Katherine, Katherine Petrin Consulting, Letter, October 05, 2015)*

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I have long been active in efforts to preserve and creatively reuse the historic industrial structures of our neighborhood, which was once the most important industrial area in the western US. I created the [www.pier70sf.org](http://www.pier70sf.org) web site to inform about Pier 70, the oldest active civilian shipyard in the US, less than a mile from the Corovan Building, and a place intimately connected with the Corovan site through the history of the Pacific Rolling Mill (originally at Pier 70) and its successor the Judson-Pacific Corporation on 17th Street.

I strongly believe development of the historic Corovan site should not simply mean token preservation of the brick office building and a small, highly modified piece of metal shed as featured in the developers' current proposed design. Massively overwhelmed by proposed surrounding structures, this approach would mean the complete destruction of the integrity of a very significant historic resource, and could well endanger the office building itself. (*Wilson, Ralph, E-mail, October 05, 2015*)

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Before more harm is done with the approval of an oversized, hideous, light-blocking, local-merchant evicting, car-dense, local gridlock-generating, soulless project, based on absurdly outdated and inadequate traffic studies and in violation of the city's commitment to preserve historical buildings and character, I ask that SF not ignore the inadequacies of the current proposed project simply because "we need more housing units". (*Wurtman, David, Letter, undated*)

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#### 1) Inadequate and Inaccurate Study of Historic Buildings

The DEIR does not adequately or accurately address issues related to the historic merit and integrity of the existing metal warehouses. The draft rejects arguments supporting historic integrity for the metal buildings. Evidence, including the research and opinion of a highly respected architectural historian, Katherine Petrin, demonstrates these buildings remain historic despite alterations and company mergers over the years.

Petrin wrote a compelling report that documented a strong case for historic integrity. Among other things, the Period of Significance was longer than City Planning's claim of 1906 – 1928 (it should be extended through at least 1946/mid-1947). And while the steel warehouses may have been altered to some degree over the years (they were built between 1908 and 1926), as Petrin points out modifications in industrial spaces are to be expected given the utilitarian purpose of these buildings and the need for flexible space.

Collectively, the Potrero Hill industrial complex contains the last remaining structures of the Pacific Rolling Mill, which began operating in the Central Waterfront in 1868 before reorganizing and relocating to Potrero Hill in the early 1900s. The buildings are also the last remaining extant structures of the merged companies, Judson-Pacific Company (1928), and Judson-Pacific-Murphy Company (1945) in San Francisco.

Photos of the buildings at 17th & Mississippi Streets from 1941 verify the intimately linked heritage and history of the Pacific Rolling Mill and its successor companies. Two SF News Call Bulletin photos show the following sign on the red brick office building: "Judson-Pacific Co. Successor To Pacific Rolling Mill Co. Established 1868."

A photograph from 1941 demonstrates that the corrugated steel building at 1200 17th Street was not simply an unenclosed shed with open side walls up until December 1947. A photograph of the structure clearly suggests an enclosed building that matches its present day aesthetic (see Petrin, Evaluation of Integrity pg. 9).

In her report, Petrin expands on this fact:

The Historic Resource Evaluation also notes that a building permit, dated 3 December 1947, was obtained to re-clad the corrugated steel structures at 1100, 1200, and 1210 17th Street. The 1941 photograph suggests that the re-cladding effort replaced already existing corrugated steel siding.

Overall, the complex retains many key elements of the original construction, plan, forms, massing, proportions, architectural vocabulary, and overall expression of a large-scale industrial operation. The site retains integrity of design....

The integrity of the basic building form of the steel warehouses has been debated based on the possibility that the steel structures were originally designed as sheds, open along the perimeter. The Historic Resource Evaluation suggests corrugated metal walls or siding was added at a later date to transform the sheds into enclosed structures. While this may be accurate, no photographs exist depicting the shed type construction. However, based on the 1941 photograph below, it is clear that the warehouse at right, 1200 17th Street, had corrugated steel walls at least by 1941. Even if the structures were open sheds at one point, they attained the present form before the end date of the period of significance, 1947. (Petrin, Evaluation of Integrity, pages 9 – 10).

Moreover, the DEIR remains inadequate and inaccurate because it overlooks the continuity of the Pacific Rolling Mill's influence and heritage over many decades along with the successive role of the Noble family. Edward Noble (the son of Patrick Noble who founded the reorganized Pacific Rolling Mill) headed the company as President after his father's death in 1920 and continued running the firm long after the first of two mergers. He remained at the helm until 1945 and was aided along the way by employees who had been hired at the original Pacific Rolling Mill at both the Potrero Hill and Central Waterfront sites.

There remains a "fair argument" that even though the metal shed buildings have not been listed on any register they qualify as a "historical resource" and demolition would have a significant impact.

As noted in Petrin's evaluation, among other things, the metal steel buildings should be added as historic resources because the 1,200 square foot red-brick office building alone insufficiently conveys the historic significance of the Pacific Rolling Mill site.

The DEIR also fails to include significance due to association with persons. As stated in Petrin's report:

....Previous research, accepted and acknowledged by the City of San Francisco Planning Department, has established that the site is significant at the local level under California Register Criterion 1, as it is associated with patterns of events that have made a significant contribution to the broad patterns of local history of California, in this case the construction of buildings and infrastructure and the industrialization of San Francisco and the West. The site is also significant at the local level under California Register Criterion 2, for its association with persons, Patrick Noble, Edward B. Noble, H.F. Hedrick and Frank Lester, among others, who founded, built, and ran the company, which resulted in the construction of some of San Francisco's most important structures. (Petrin, Evaluation of Integrity, page 5).

Recently, members of the San Francisco Historic Preservation Commission applauded the DEIR's "Metal Shed Reuse Alternative" and encouraged the project sponsor to incorporate more of it into a final design. The HPC concluded the developer's current plan would impact a historic resource – the red-brick building (a position that contradicts the DEIR). The HPC also determined that more consideration should be given to the negative impact of scale and massing of the developer's current proposal upon the entire building

site. The DEIR does not adequately address these impacts nor does it propose mitigations to avoid and reduce them.

... The City should revise the DEIR to reflect the historic significance and integrity of these buildings based on Petrin's report. Moreover, in response to the HPC's list of concerns, the DEIR should address and propose mitigations that would avoid significant and negative impacts due to mass and scale upon the entire building site and environment.

As we've previously noted, the Historic Preservation Commission and City Planning upheld an appeal by the developer in 2011 that was based on incomplete and inaccurate factual information and without adequate public notification. The DEIR remains deficient because it does not address the inadequacy of public notification of an appeal by the developer in 2011. Moreover, the cumulative loss of culturally significant industrial spaces was not adequately evaluated in the Eastern Neighborhood's EIR and subsequent area surveys of potential historic properties. Assumptions around the loss of these buildings in the Eastern Neighborhood's EIR have turned out to be inaccurate with demolition far more impactful and detrimental than originally anticipated. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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The Rolling Mill was the first iron and steel foundry in the west associated with the industry's rise following the Civil War, and later the turn of the century with the advent of steel frame buildings and San Francisco's rebuilding after 1906. The company was crucial in building the Ferry Building, Grace Cathedral, San Francisco General Hospital, the Golden Gate and Bay Bridges, and it was also one of the first Potrero Hill industries drawing workers who built their homes nearby. It's ironic and very sad that while corrugated metal continues to be popular in new construction, the buildings which inspired this Industrial style are quickly disappearing. The San Francisco Opera corrugated metal warehouse at 800 Indiana is torn down at this moment. Center Hardware's corrugated metal building at 999 Mariposa will be torn down, I imagine, in about a year, and I have no doubt that the San Francisco Gravel building at 552 Berry will follow. The Draft EIR found that alterations to the Rolling Mills building excluded them from historic preservation. This is ridiculous. By their nature, industrial buildings are regularly altered as the need arises. Do extensive alterations make City Hall and the Ferry Building not historic buildings? Katherine Petrin's detailed study determined that the Corovan site buildings are historic and deserve to be preserved. (*Linenthal, Peter, Transcript, October 1, 2015*)

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My name is Katherine Petrin. I'm an architectural historian. In 2013, I was asked by Save The Hill to provide my professional opinion as to whether the Pacific Rolling Mills site retains sufficient integrity to convey its historic significance. As you are aware, the integrity of this site, specifically the basic building forms of the steel warehouses, has been much debated. It was my finding that overall the complex contains many key elements of the original construction. Its plan forms massing proportions and architectural vocabulary, and most importantly, the overall expression of a large-scale industrial operation. Because the complex contains these elements, I find it sufficiently intact to convey its historical associations with the Pacific Rolling Mill Company, and to convey enough of its historic character to be recognized as a historic resource. (*Petrin, Katherine, Transcript, October 1, 2015*)

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My name is F. Joseph Butler, and I am an architect here in the city, and I would like to make comments about the evaluation that was done for this site. The Pacific Rolling Mills Company has a long history in San Francisco. They began on Potrero Point in 1868, and one Patrick Noble was employed at that time. Thirty years later, he took the company from Potrero Point to 16th and Mississippi. In fact, he was up against Texas on 17th with his first foundry, and eventually moved across the street. As you see on this map (indicating) it was on the edge of the water. So basically, the site was an array of metal sheds, as they grew as a company on the land that was dry -- high and dry, as they say. So 20 years as its president, he left the company to his son. Edward Noble took the company from 1920 into World War II, and came out the other end. Finally, the operations on Potrero Hill slowed down, and eventually other uses filled the space. It's uniquely flexible. It's the most quality PDR space that you have in this whole Showplace Square district. It was the innovative building. Those people who fabricated steel in this building produced the Fairmont and St. Francis Hotel structural frames, the Crocker Building, the Flood Building, the State Capitol in Sacramento, the Standard Oil building downtown, the Spreckles Building, the BelAir Apartments on Russian Hill, the PG&E outlet in a variety of different places, the School of Education at Stanford, the University of Berkeley Gymnasium in 1931, post offices, hospitals, libraries and bridges. They built these sheds the entire Richmond/San Rafael Bridge. And you're going to tell me at the end of saving a red brick building that that's adequate to convey the significance of what occurred on this site? Not even close. *(Butler, Joseph, Transcript, October 1, 2015)*

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The industrial structures that make up the Corovan site constitute the sole remainder of what was once the largest steel production factory on the West Coast. The site holds a unique role in the city's history, one that would best be acknowledged through adaptive reuse of the metal structures. The structures provide the neighborhood with a surprising vestige of another era, as well as the texture and patina that can only be acquired over time and by not destroying all traces of the past.

... I entreat the Planning Commission to continue their commendable work with the community and the developers to thoughtfully optimize the site's unique potential. This entails updating traffic studies and other environmental data used in the Draft EIR, revisiting the considerations of historic integrity, acknowledging the need for a development that significantly lessens the density and height of the developer's outside's proposal. *(Miller, Ruth, Transcript, October 1, 2015)*

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And there is a very good page in terms of the report which basically talks about the existing buildings on the site, saying that only the small brick office building is one that is significant under Criteria One, and the other buildings don't have enough integrity to be associated with the Pacific Rolling Mills. So that's the opinion of one very notable historical firm that has analyzed this particular project. So, I appreciate all of the comments and certainly take them consideration. *(Commissioner Antonini, San Francisco Planning Commission, Transcript, October 1, 2015)*

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Specific to the EIR -- I'm sorry, that was just a bit of a tangent. A question I have about the metal sheds, is here we have two historic reports, one from Ms. Petrin and one from Mr. Minott, as well. Is it historic? Is it not historic? It is dueling opinions. I don't know. The HPC apparently at one time thought it was historic and they removed it from the historic -- can anybody comment on how that all happened? Mr. Plank? Veteran? Staff? [COMMISSIONER JOHNSON: Excuse me, this is a comment to the Draft EIR.] Oh, I'm



sorry. Thank you. I'm not a trained preservationist -- I like preservation. It's hard for us to get two different opinions and it kind of just bothers me a little bit. (*Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015*)

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Since we had three or four experts actually speaking to the different Interpretation of historic preservation as it deals with metal sheds, I do believe that historic preservation, like anything else, is an area of expertise and of varying opinions, and I would strongly urge that this EIR takes this issue further. One opinion cannot form all of the truth encompassing truth of what a historic preservation should look at for the site. (*Commissioner Moore, San Francisco Planning Commission, Transcript, October 1, 2015*)

### **Response CP-1**

These comments related to whether the metal sheds at the site are a historic resource. A complete Historic Resource Evaluation (HRE) was prepared and is available for review at the Planning Department as part of Case File No. 2011.1300E. The HRE was prepared by a consultant under direction by the Planning Department and the Planning Department concurred with conclusions in the HRE. Section IV.B, Historic Architectural Resources of the Draft EIR, presents the results of this evaluation. The HRE specifically referenced the previous evaluations completed for the property to clarify the historical record, and these are summarized on pages IV.B.17 through IV.B.20. As discussed in more detail below, only the brick office building at 1200 17<sup>th</sup> Street was found to be a historic resource by the Historic Preservation Commission (Motion 0134, 8/17/2011), which is consistent with the conclusions of the Draft EIR, the HRE, and the City's Historic Resource Evaluation Response (HRER, which is also available as part of Case File No. 2011.1300E).

The discussion is broken up into two following subheadings: Eligibility Determination and Opinions and Historic Determinations. This response focuses specifically on the metal sheds at the site and not on the brick office building. Response CP-2 additionally discusses the brick office building and the potential impact of the project on that historic resource.

#### *Eligibility Determination*

A number of comments contended that the metal sheds are eligible as historic resources due to historic associations with the Pacific Rolling Mill Co. and associated owner, as examples of period industrial structures, and/or as a connection to the industrial past of the area. The eligibility determination as assessed in the HRE was presented on pages IV.B.13 and IV.B.20 through IV.B.26 of the Draft EIR. As detailed below, the HRE/HRER established significance under Criterion 1, but the sheds were found ineligible due to insufficient integrity. The HRE eligibility determination as it relates to the metal sheds under the California Register of Historical Resources' (CRHR) four criteria and seven aspects of integrity is provided below in indented text excerpted from the HRE:

#### **Historic Eligibility Criteria**

- Criterion 1 (Event): Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

If it retained integrity, the entire former Pacific Rolling Mill Co. site would appear eligible for listing in the California Register under Criterion 1 (Events) for its association as an important

structural steel fabrication company that made an outsized contribution toward the reconstruction of San Francisco after the 1906 Earthquake. Among many others, the Pacific Rolling Mill Co. supplied structural steel for San Francisco General Hospital, the Standard Oil Building, the Balfour Building, the San Francisco Public Library, the YMCA on Golden Gate Avenue, the Financial Center Building in Oakland, the California-Hawaii Sugar Refinery in Crockett, and several of the buildings for the 1915 Panama Pacific International Exposition. (Additional examples are provided in comments as well.) All three pre-1927 structures on the property share this context, including the warehouses at 1200/1100 17th Street and 1210 17th Street/965 16th Street, and the brick office building, also at 1200 17th Street. But of these structures, only the brick office building retains integrity from the period of significance. In contrast, the two metal-clad structures were extensively altered in 1946-7 when Owens-Illinois Glass Co. converted the property into a general-purpose warehouse facility [and it could no longer operate as a steel fabrication facility].

The period of significance under Criterion 1 is 1906 to 1928, the period in which the subject property was occupied by the Pacific Rolling Mill Co. and when the company made the bulk of its contributions toward the reconstruction of San Francisco after the 1906 Earthquake. Though other studies have argued that the period of significance ought to extend to 1946, when the last steel fabricator, Judson Pacific-Murphy, vacated the site, the subsequent owners were larger corporations, whose manufacturing operations took place at multiple plants, diluting the association of the subject property with the fabrication of steel frames for specific projects. Even if the period of significance was moved to 1946, the metal-clad warehouses do not retain sufficient integrity from the period prior to 1947 because of the extensive alterations made by Owens-Illinois Glass Co. in 1947.

- Criterion 2 (Person): Resources that are associated with the lives of persons important to local, California, or national history.

The former Pacific Rolling Mill Co. facility does not appear eligible for listing under California Register Criterion 2 (Persons). Though the Pacific Mill Rolling Co. was founded by Patrick Noble – a notable San Francisco industrialist and public figure – he died in 1920, six years before the brick office building (the only intact structure on the site that retains integrity) was constructed. In order to be eligible under Criterion 2, a property must also have a tangible association with an important person, meaning that the property must have been where that person made his or her most important contributions. For the entire time that Patrick Noble was owner of the Pacific Rolling Mill Co. he maintained his headquarters in downtown San Francisco. It was only after his death that the company's main office moved to 1200 17th Street.

- Criterion 3 (Design/Construction): Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.

Other than the brick office building, the Pacific Rolling Mill Co. facility was constructed of impermanent materials – mainly wood and corrugated metal – because the purpose of these structures was simply to shelter production work from the elements. Designed to be easily adapted to changes in use or production techniques, they did not need to be attractive works of architecture. As previously discussed, the metal sheds were extensively altered in 1946-7 when Owens-Illinois Glass Co. converted the property into a general-purpose warehouse facility. The metal sheds do not appear eligible for listing under California Register Criterion 3 (Design Construction).

- Criterion 4 (Information Potential): Resources or sites that have yielded or have the potential to yield information important to the prehistory or history of the local area, California or the nation.

Criterion 4 mainly deals with archaeological resources and is not applicable to the current assessment. The metal sheds are not eligible for listing under California Register Criterion 4 (Information Potential).

#### Aspects of Integrity

- Integrity of Location: "Location is the place where the historic property was constructed or the place where the historic event occurred."

No part of the former Pacific Rolling Mill Co. facility has ever been moved. Therefore, it retains integrity of location.

- Integrity of Design: "Design is the combination of elements that create the form, plan, space, structure, and style of a property."

The original designs of the two metal-clad structures have been significantly changed. Two of the structures on the site (1100 and 1210 17th Street) were originally framed canopies without exterior walls. These sheds were mostly open along their sides (aside from wooden canopies and a security fence) to facilitate the movement of large subassemblies in and out of the structures. The conversion from manufacturing to warehouse use necessitated the addition of permanent walls to safeguard manufactured goods from theft and to facilitate the orderly storage and distribution of these goods to retailers. Shelving took the place of open work space and exterior walls went up to prevent unauthorized entry. Similarly, the former shops structure at 1200 17th Street has undergone substantial changes to both its interior and to its exterior elevations. The former shops structure, which was always an enclosed structure, was also altered during its conversion to warehouse use. The fenestration along the lower part of the 17th Street façade was removed and the north façade facing 16th Street was rebuilt as a series of loading docks. Later changes include the removal of the large wood barn door from the south façade of the shops structure in 1969 and other incremental changes over time. As demonstrated by a comparison of existing conditions with historic photographs taken in 1945, the metal-clad structures look substantially different now than they did during the period of significance.

In conclusion, the metal sheds and the site as a whole do not retain integrity of design.

- Integrity of Setting: "Setting is the physical environment of a historic property."

Since the former Pacific Rolling Mill Co. facility was completed in 1926, many changes have occurred on the site and in the surrounding neighborhood. In addition to the demolition of the adjoining Pacific Refining and Roofing Co. plant ca. 1947, several concrete industrial buildings were built on adjoining properties in the late 1920s, 1930s, and 1940s. In the late 1960s, the construction of the I-280 viaduct separated the subject property from the Mission Bay area. In addition, most of the industrial facilities north of 16th Street were pulled down ca. 2000 for residential development which is now underway. Since the 1960s, most of the train tracks and other rail facilities in the vicinity were removed or paved over. Finally, the erection of several residential loft buildings in the 1990s and 2000s on adjoining properties facing Missouri and 16th streets introduced high-density residential uses to the formerly industrial block. Cumulatively

these changes have converted what was originally a stand-alone industrial plant in a sparsely populated industrial neighborhood into part of a mixed-use community containing a blend of industrial, office, and residential uses.

In conclusion, due to the extensive changes that have occurred in the vicinity of the former Pacific Rolling Mill Co. property, the site as a whole and the metal sheds do not retain integrity of setting.

- Integrity of Materials: “Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.”

As mentioned above, the 1100/1210 17th Street shed were clad in corrugated metal in 1946-7 when they were converted into enclosed warehouses. Additional sections of these structures have been re-clad in recent years. The northern half of the warehouse structure at 1100 17th Street was entirely rebuilt in 1946-7. Aside from portions of their structural framing, given the construction with impermanent materials, it is doubtful that these three structures retain any of their original materials.

In conclusion, the site as a whole and the metal sheds do not retain integrity of materials.

- Integrity of Workmanship: “Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.”

As a facility built of industrially produced materials handled in a conventional manner typical of its era, most of the former Pacific Rolling Mill Co. facility does not embody notable examples of workmanship. While the brick office building retains some evidence of traditional workmanship (e.g., handcrafted brick corbelling, brick voussoirs, keystone surrounding the arched entrance), the metal sheds do not retain integrity of workmanship.

- Integrity of Feeling: “Feeling is a property’s expression of the aesthetic or historic sense of a particular period of time.”

Though research indicates that there have been major changes to the former Pacific Rolling Mill Co. complex, the changes that were made are generally compatible with industrial usage. For that, the former Pacific Rolling Mill Co. facility retains integrity of feeling.

- Integrity of Association: “Association is the direct link between an important historic event or person and a historic property.”

Extensive alterations to the former Pacific Rolling Mill Co. facility in 1946-7 converted what were formerly open sheds into enclosed warehouses. These alterations, made by the Owens-Illinois Glass Co., occurred well after the period of significance (1906-1928). See further discussion under Criteria 1 and 2 above.

In conclusion, the site as a whole and the metal sheds do not retain integrity of association.

- CRHR Criteria and Integrity Conclusions

If it retained integrity, the entire former Pacific Rolling Mill Co. site, including the metal sheds, would appear eligible for listing in the California Register under Criterion 1 (Events) for its

association as an important structural steel fabrication company (Pacific Rolling Mill Co.) that made an outsized contribution toward the reconstruction of San Francisco after the 1906 Earthquake.

Of the seven aspects of integrity, the metal sheds retain only the aspects of location and feeling. Aspects of design, materials, workmanship, and association were lost in 1946-7 when the site was converted from manufacturing to warehousing and the structures were extensively altered from the open-sided metal sheds and shops building used during the period of significance of the Pacific Rolling Mill Co (1906-1928). (Integrity of setting has also been lost as the surrounding neighborhood has developed over time.) Due to the loss of the majority of the aspects of integrity, the metal sheds were determined not to retain adequate integrity to convey historic significance under Criterion 1.

Some comments suggest that changes to industrial structures would not disqualify them from retention of historic significance because industrial structures are intended to be flexible and change over time. This contention is addressed through the assessment of all seven of the aspects of integrity. Specifically, it was not the mere fact of modifications to the structures that resulted in a determination that the site did not maintain integrity of design, but the substantial changes that were made, both on the interior and exterior, that both changed the look of the structures and their use from manufacturing to warehousing. The aspect of “feeling” captures the retention of a historic sense of industrial usage of the site, even if the buildings do not have integrity of design. As discussed above, the metal sheds were found to retain integrity of feeling.

Therefore, as discussed above, the analysis of historic architectural resources, including consideration of historic eligibility of the metal sheds, was adequately addressed in the Draft EIR per CEQA Guidelines Section 15151. Subsequent comments and submitted photos are generally a repeat of information already known, and have not presented information germane to the question of historic eligibility of the metal sheds that was not already considered for the above conclusions.

#### *Opinions and Historic Determinations*

The metal sheds are not currently included in local, state or national surveys of historic resources. A summary of the historic surveys related to the site was included on pages IV.B.17 through IV.B.24 of the Draft EIR. A number of comments reference previous Planning Department determination that the metal sheds were historic. As summarized below, that previous determination was re-evaluated, and the metal sheds were ultimately determined not to be historic resources in that process:

- In 1996, the site was assessed as part of the review for Caltrans’ repair of Interstate 280 and the entire site was assigned a status code of 6Y, indicating ineligibility for the historic register.
- In 2008-2009, the site was reassessed as part of the San Francisco Planning Department’s Showplace Square Survey, performed by Kelley & VerPlanck Historical Resources Consulting (Kelley & VerPlanck). This study surveyed the project site but did not include it in the potential historic districts identified in the survey and noted that further research was needed prior to making an eligibility determination for the site.
- In 2009, Planning Department staff recommended a proposed status code of 3CS to the entire site, indicating the entire site would be eligible for the California Register.

- In 2011, a Page & Turnbull Report was completed that concluded only the brick office building was an eligible historic resource at the site. This study was completed because the owner of the site contested the proposed recommendation of eligibility and the City requested additional analysis.
- On August 17, 2011, the Historic Preservation Commission, upon the recommendation of the Planning Department preservation staff, reviewed the new information and concurred with Page & Turnbull's 2011 report to conclude that the majority of the site was not eligible for listing on a historic register, with only the brick office building being an individually eligible historic resource and assigned the status code of 3CS (Motion 0134). The remainder of the site, including the metal sheds, reverted to a status code of 6Y, indicating ineligibility for the historic register.

A number of comments reference differing expert opinions. At the request of Save the Hill, a historic assessment was completed in 2014 by Katherine Petrin. The Petrin Report made a contrary conclusion that the metal sheds were eligible for listing on historic registers and should be considered historic resources. The difference in this conclusion was based largely on a longer period of significance (until 1947, whereas the HRE and previous studies determined the period of significance ends in 1928, when Pacific Rolling Mill Co. merged with Judson Manufacturing Co. and the headquarters was moved off the site), and retention of sufficient integrity from the longer period of significance to convey the historical significance.

The VerPlanck HRE utilized for the analysis in the Draft EIR included review of the above Petrin Report, and confirmed the Historic Preservation Commission finding, based on the full record, that the only structure on the site eligible for historic listing was the brick office building. This finding was based on a thorough analysis of changes to the property over time that resulted in a lack of integrity for the metal sheds.

The full record, including the Petrin and VerPlank reports, was reviewed by City preservation staff and a HRER was issued. The HRER represents the independent conclusion of the City after consideration of varying opinions. The HRER specifically concurred with the 2014 VerPlanck Report and the previous finding by the HPC that the brick office building is the only structure on the site eligible for historic listing. The HRER also notes that other reports submitted to dispute the findings of the VerPlank Report did not provide sufficient information to conclude that the other buildings on the site retained sufficient integrity to qualify as historic resources.

Given the HPC's reconsideration of the Planning Department's 2009 eligibility determination as described above and the history of professional surveys/determinations encompassing the site, only the 2014 Petrin Report concluded the metal sheds were eligible historic resources. Additional submitted materials and comments, including photographs and submitted comments from Katherine Petrin in response to the Draft EIR, provided no information germane to the consideration of eligibility of the metal sheds that was not already considered for this determination or that would change impact conclusions or conclusions that the metal sheds are not eligible historic resources.

This topic was addressed in the Draft EIR because, pursuant to CEQA Guidelines Section 15064(f)(1), a fair argument was made that the proposed project would result in an impact to a historic resource. The City determined, based upon the substantial evidence discussed above, that the proposed project would have no environmental impact related to removal of the metal sheds.

**Comment CP-2: Impact of the Project on the Historic Brick Office Building**

The scale and massing of the proposed project as currently proposed causes an impact to the eligible historic resource identified on the site (the Brick Office Building). The HPC recommended that the project be revised considering the criteria set forth in the Secretary of the Interior's Rehabilitation Standard No. 9 in regards to materials, scale and massing of the proposed adjacent new construction; (*Wolfram, Andrew, Historic Planning Commission, Letter, September 21, 2015*)

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The problems with the DEIR include:...6) Inadequate and Inaccurate Study of Historic Buildings (*Glicken, Sarah, E-mail, September 25, 2015*)

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The developers have put forth a proposal that would salvage mere fragments of these structures. As someone who knows a thing or two about architecture, I can say with some authority that these fragments would be threatened by the very nature of the surrounding proposal. (*Roberts, Kent, E-mail, October 04, 2015*)

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I also believe that there are considerable adverse impacts from the proposed design by Walden Development that cannot be mitigated. The area of traffic congestion and loss of historical resources are very important in this regard. The EIR does not provide substantial evidence that the adverse effects can be mitigated effectively. (*Anasovich, Philip, E-mail, October 05, 2015*)

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I have reviewed the proposed project drawings, and I am in complete agreement with the assessments prepared by both Christopher VerPlanck and Planning Staff that the proposed design is in compliance with the Secretary of the Interior's Standards for Rehabilitation. Specifically, the proposed project would not have a significant impact on a historic resource, and the proposed design is in compliance with Standard 9, which evaluates the compatibility of adjacent new construction.

Standard 9 reads:

New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

The intention of the proposed design is to have the brick Administration Building, which is the only historic resource identified on the property, read as a free-standing structure. This will be accomplished by providing air space both above the building and on its four sides.

No historic materials, features or spatial relationships that characterize the property will be destroyed. Currently, there are non-historic buildings adjacent to the existing brick Administration Building. These non-historic buildings will be removed and the brick building will be retained and rehabilitated.

The proposed new design will match the height of the historic building at the first and second stories, and the third story of the new building will be set back 7 to 8 feet. An 11'-9" gap will be created on the west side of the historic building, a 10'-5" wide notch will be built along the east side of the historic building, and an open-air courtyard will be created behind the building, separating the Administration Building from all new construction and effectively returning it to its original condition as a free-standing structure.

In addition, the proposed materials for new construction - - primarily concrete and corrugated metal -- are compatible with the industrial character of the site.

The proposed work will not have an impact on the existing historic brick building and will, in fact, highlight it by creating space around the building, allowing it to read as an independent structure. (*Kiernat, Carolyn, Page & Turnbull, Letter, October 05, 2015*)

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Much has already been written and expressed to City Planning regarding the historic integrity of the existing buildings. Of recent note, however, is the Historic Preservation Commission's own assessment that the current project proposal lacks the necessary sensitivity and deference to a historic resource required to receive their support. Their summary critique is included verbatim below:

1. The scale and massing of the proposed project as currently proposed causes an impact to the eligible historic resource identified on the site (the Brick Office Building). The HPC recommended that the project be revised considering the criteria set forth in the Secretary of the Interior's Rehabilitation Standard No. 9 in regards to materials, scale and massing of the proposed adjacent new construction;
2. The HPC also recommended that the project sponsor consider revisions to the project that includes appropriate concepts, such as materials, scale and massing, from the Metal Shed Reuse alternative; and
3. The HPC requests that the proposed project be reviewed by the Architectural Review Committee prior to the EIR certification hearing. (*Smails, Arcadia, Letter, October 05, 2015*)

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Among the key concerns stressed by the HPC related to how the developer's current proposal does not comply with the Secretary of the Interior's Standard #9 on compatibility of massing, size, scale in relation to the entire building site and surrounding environment. This standard states the following:

....9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment. (Secretary of the Interior's Standards for Rehabilitation)....

Again, the DEIR does not adequately address the above nor does it propose mitigations to avoid or reduce them to a less than significant level.

... Moreover, in response to the HPC's list of concerns, the DEIR should address and propose mitigations that would avoid significant and negative impacts due to mass and scale upon the entire building site and environment. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)



**Response CP-2**

These comments relate to the potential for the proposed project to impact the historic character and relevance of the brick office building. For a discussion of the historic significance of the site and metal sheds, see CP-1. The brick office building is recognized in Section IV.B of the Draft EIR as an eligible historic resource. Per CEQA Guidelines section 15064.5(b)(3), restoration/rehabilitation of a historic resource is generally presumed to result in a less than significant impact if it is consistent with applicable Secretary of the Interior's Rehabilitation Standards (Rehabilitation Standards). Projects that do not comply with the Rehabilitation Standards may or may not cause a substantial adverse change in the significance of an historic resource and would require further analysis to determine whether the historic resource would be "materially impaired" by the project under CEQA Guidelines 15064.5(b). The changes proposed as a part of the project were assessed in the context of the historic nature of the brick office building against the Rehabilitation Standards to determine whether the proposed project would be considered a significant impact to the historic brick office building. The full analysis is contained on pages 46 through 51 of the HRE and summarized on pages IB.V.26 and IV.V.27 of the Draft EIR.

These comments suggest that development of new buildings on the site around the retained brick office building would impair the historic relevance of the brick office building, which relates to Rehabilitation Standard 9, as discussed below (text excerpted from the HRE is indented).

**Rehabilitation Standard 9: New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.**

The brick office building's construction materials and detailing differentiate it from the rest of the site. As originally designed, the brick office building was joined at one small section to the metalclad shops structure to the east, which was built at the same time, but otherwise it was entirely freestanding.

In 1946-7, Owens Illinois Glass Co. constructed wood-frame roof sections clad in corrugated metal to enclose the gaps between the office building and the surrounding metal-clad warehouses. The proposed project will remove these connections and restore the brick office building's appearance as a freestanding structure.

The new residential building at 1200 17th Street would not be an addition to the brick office building but rather adjacent new construction. A gap measuring 11'-9" wide will be provided on the west side of the office building, recognizing similar conditions that existed before the metal-clad structure at 1210 17th Street was enclosed in 1946-7. Though the new residential building will adjoin the brick office building along a small portion of its east wall, this condition resembles what has existed since the office building was constructed in 1926. However, a small notch-out measuring 10'-5" x 4'-10" will provide some separation between the two structures and allow a portion of the east wall of the office building to be viewed. Finally, a substantial open space will occupy the area behind the brick office building, creating a significant amount of "breathing room" behind the building so that it reads as a freestanding building.

Therefore, the proposed project was found consistent with Rehabilitation Standards, including Rehabilitation Standard 9 related to other alterations at the site. Because the project was determined to be consistent with the Rehabilitation Standards prior to approval, the regulatory presumption under CEQA

Guidelines Section 15064.5 is that the project would not cause a substantial adverse change in the significance of the historic brick office building. Upon independent review of the full record, City preservation staff agreed with this conclusion in the HRER.

Detailed figures focused on the project plans for and surrounding the brick office building were presented at a noticed meeting of the Architectural Review Committee (ARC) of the Historic Preservation Commission on November 4, 2015. The materials presented in this meeting are included as Attachment D of this RTC document. Following consideration of the detailed presentation, the ARC provided a letter with the following responses:<sup>21</sup>

Upon review of the additional materials provided, the ARC determined that:

1. The proposed project does not cause an impact to the existing historic resource on the site (the brick office building). The proposed project respectfully incorporates the historic building alongside adjacent new construction and does not overwhelm the historic resource by providing adequate setbacks and open space around the brick office building.
2. The proposed project meets Secretary of the Interior's Rehabilitation Standard No. 9 in regards to materials, scale and massing of the proposed adjacent new construction.

Therefore, as discussed above, the analysis of historic architectural resources, including consideration of historic eligibility of the metal sheds further discussed in Response CP-1 and the potential for new development at the site to impact the historic brick building, was adequately addressed in the Draft EIR per CEQA Guidelines sections 15151 and 15064.5. Additional submitted materials and comments, including photographs and submitted comments from Katherine Petrin in response to the Draft EIR, provided no information germane to the question of the impact of the proposed development on the historic brick building that was not already considered for this determination or that would change impact conclusions.

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<sup>21</sup> Andrew Wolfram, Chair, Architectural Review Committee of the Historic Preservation Commission, letter to Environmental Review Officer, November 5, 2015. This document and all subsequent documents referenced are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2011.1300E.

## E. ALTERNATIVES

The comments and corresponding responses in this section cover topics in Section VI, Alternatives, of the Draft EIR. These include topics related to:

- Comment AL-1: Metal Shed Reuse Alternative Trip Generation
- Comment AL-2: Support for the Metal Shed Reuse Alternative
- Comment AL-3: Financial Feasibility of the Metal Shed Reuse Alternative
- Comment AL-4: Adequacy of the Alternatives Analysis, Support Specifically for the Reduced Density Alternative or Generally for an Alternative, or Suggestion of an Different Alternative
- Comment AL-5: PDR in the Metal Shed Reuse Alternative
- Comment AL-6: Assessment of PDR Loss for the Alternatives

### **Comment AL-1: Metal Shed Reuse Alternative Trip Generation**

How did DKS arrive at the traffic impact of PDR artist workspace in the Adaptive Reuse Alternative plan? Please point me to the data and assumptions they relied on to make their determination.

...So PDR workspace is treated as office, correct? Why does office generate more trips than residential? Please explain how workspace set aside for artists (in a reduced project density) could possibly trigger an amount of vehicle traffic equal to the project sponsor plan at those 3-4 intersections? BTW, the artist space was only suggestive as Save The Hill pointed out in our submission. It could easily be tweaked to remedy traffic flow and achieve enviro superiority. (*Minott, Rod, E-mail, August 19, 2015*)

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If I understand this document correctly it suggests that PDR is more traffic-generating as a category than is residential. Is that correct? Given the fact that many types of industries are categorized under PDR including a number of low -impact / light industries, I am wondering if the reason for this is that the category of PDR is generically perceived by Planning in terms of its maximum potential impact. Can you shed light on this for me? It's hard to understand how artists' studios, for example, could be more traffic-generating than housing. (*Miller, Ruth, E-mail, August 22, 2015*)

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I am surprised that some people believe this Alternative would cause more traffic than the proposed 395 dwelling units of the Walden proposal. I demand to know the reasoning behind this falsehood. (*Anasovich, Philip, E-mail, September 12, 2015*)

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The PDR / Trade Shop component of the proposal was intended for light and low impact purposes. I ask that the "Metal Shed Reuse Alternative" plan be revised by City Planning such that inclusion of light or

low impact PDR / Trade Shop workspaces achieve environmental superiority. (*Loomis, John, E-mail, October 03, 2015*)

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The Metal Shed Adaptive Reuse Alternative includes 56,000 square feet of light PDR, artist and maker space. Contrary to the Draft EIR suggestion that transportation-related impacts would not differ between the Metal Shed Alternative and the Proposed Project, the 2008 Eastern Neighborhoods and the recent TSP Nexus Studies both show that PDR has the lowest impacts on transit. (*Heath, Alison, E-mail, October 05, 2015*)

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The DEIR includes City Planning's modified version of an alternate project plan submitted by Save the Hill. While some aspects of this alternate, lower-density "adaptive reuse" proposal are commendable, other aspects are inadequate and some of the data from which this proposal is driven is simply flawed. City Planning appears to have taken Save The Hill's original suggestive renderings and skewed numbers to suggest that PDR space set aside for artists would generate volumes of vehicle traffic equal to the developer's vastly bigger project proposal. The effect was to deny awarding the adaptive reuse alternate plan the designation of "environmentally superior". Save The Hill questions the adequacy and accuracy of City Planning's methodology to analyze the traffic impact of light or low impact PDR Trade Shop / artist workspaces.

...We ask that City Planning acknowledge the "suggestive" nature of the proposed adaptive reuse renderings submitted by Save The Hill, and more specifically that the PDR / Trade Shop component of the proposal was intended for light and low impact purposes. City Planning's version of an adaptive reuse plan (Metal Shed Reuse Alternative) should be revised such that inclusion of light or low impact PDR / Trade Shop workspaces achieve environmental superiority. Again, Save The Hill questions the adequacy and accuracy of City Planning's methodology in the DEIR to analyze the traffic impact of these light or low impact PDR Trade Shop / artist workspaces – analyses which, according to recent communication between myself and Chris Thomas of City Planning, appear to reflect traffic generated by high impact office use rather than low-impact PDR use.

This is puzzling in light of the City's own Environmental Impact Report for the Eastern Neighborhoods which states that PDR generates less traffic than office or retail:

.... PDR uses generate fewer vehicle trips per 1,000 square feet than retail or office uses. (Page 295, EN Rezoning & Area Plans, Case No. 2004.0160E, IV. Environmental Setting and Impacts E. Transportation). (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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Contrary to the draft EIR suggestion that transportation recommended impacts would not differ between the metal shed alternative and the proposed project, the 2008 Eastern Neighborhoods and TSP nexus studies both show that PDR has the lowest impacts. (*Heath, Alison, Transcript, October 1, 2015*)

**Response AL-1**

The comments raise concerns regarding the trip generation associated with the Metal Shed Reuse Alternative, citing the expected lower trip generation of PDR land use over residential use and the trip generation rate used for PDR land use.

As discussed in Chapter II of this document, consistent with local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, San Francisco has adopted VMT criteria in place of automobile delay criteria and VMT/induced automobile travel impact analysis is provided in Section IV.A, Transportation and Circulation. However, because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA.

The VMT analysis determined that, based on average daily VMT that is substantially below regional averages, the impact related to VMT would be less than significant.

The trip generation rate used in the analysis of the Metal Shed Reuse Alternative for PDR land use is consistent with the Planning Department's Transportation Impact Analysis Guidelines, using the trip generation rate for Office land use, 18 trips per 1,000 square feet. Commenters are correct, however, that the City's recent nexus study for the Transportation Sustainability Fee (TSF Nexus Study) used a different, lower trip rate for PDR uses.<sup>22</sup> In order to provide additional information and in response to comments received, the trip generation was analyzed for the Metal Shed Reuse Alternative using the lower rate of seven trips per 1,000 square feet of PDR land use consistent with the TSF Nexus Study. The resulting analysis showed a reduction in PM peak hour trip generation by 44 trips, to 1,224 person trips, compared to 1,268 PM peak hour person trips utilizing the Planning Department's Transportation Impact Analysis Guidelines generation rate. As can be seen by this relatively small reduction in trips, the majority of trips under this alternative would be generated by residential or commercial uses and would be unaffected by the change in trip rate for PDR uses. Utilization of the lower PDR trip rate would not change intersection impact conclusions or environmental superiority related to the Metal Shed Reuse Alternative.

Some comments also suggest the Metal Shed Reuse Alternative should be modified to further reduce vehicle trips such that it could be identified as the environmentally superior alternative. The renderings submitted by Save The Hill were considered as generally "suggestive" of an approach for reuse of the existing metal sheds by the Planning Department. The Metal Shed Reuse alternative evaluated in the Draft EIR was chosen as a reasonable alternative that would retain the metal sheds and some PDR space while meeting Planning Code requirements and most of the project objectives and present a comparison of impacts for such an alternative against those of the proposed project. The Reduced Density Alternative was chosen to address intersection impacts. The choice of discrete alternatives is intended to demonstrate the comparative impacts of different alternative actions. City decision-makers will consider the range of alternatives presented and comments received, and may approve, disapprove, or modify the proposed project or one of the project alternatives through their approval actions on the proposed project. The

<sup>22</sup> San Francisco Municipal Transportation Agency, prepared by Urban Economics, *San Francisco Transportation Sustainability Fee (TSF) Nexus Study*, May 2015, available at [http://www.sf-planning.org/ftp/files/plans-and-programs/emerging\\_issues/tsp/TSF\\_NexusStudy\\_May2015.pdf](http://www.sf-planning.org/ftp/files/plans-and-programs/emerging_issues/tsp/TSF_NexusStudy_May2015.pdf).

analysis of the Metal Shed alternative as proposed does not preclude consideration or approval of a smaller project.

See Response AL-4 for further discussion of choice of alternatives and adequacy of alternative analysis. With revisions in this document per Planning Commission Resolution 19579 related to analysis of traffic impacts, the Metal Shed Reuse Alternative is considered environmentally superior to the proposed project.

**Comment AL-2: Support for the Metal Shed Reuse Alternative**

The metal shed reuse alternative offers lower building heights, more open space and mixed use sections with less residential units. Please consider this option. (*Gavre, Yvonne, Letter, September 05, 2015*)

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The HPC also recommended that the project sponsor consider revisions to the project that includes appropriate concepts, such as materials, scale and massing, from the Metal Shed Reuse alternative; (*Wolfram, Andrew, Historic Planning Commission, Letter, September 21, 2015*)

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That said, I do support the modified METAL SHED REUSE alternative. It would lower the overall project height a bit, reduce the number of residential units (and, hopefully, cars), etc., thereby making it seem somewhat less intrusive to and defacing of our neighborhood. It also does retain — with some modifications — a semblance of the historic site by repurposing rather than destroying the existing metal structures. This is a desirable and very workable compromise. (*Boyd, David, E-mail, September 07, 2015*)

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I am a strong supporter of the alternative that they have proposed or another reduced plan that proposes reasonable density for the site. (*Goldenberg, David, E-mail, September 11, 2015*)

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On the other hand, the Planning Department did take the initiative to examine an alternative to the Walden Development proposal; it hired Christiani Johnson architects to study a Metal Shed Reuse Alternative. This was an excellent idea that offers a much needed alternative to the over-scaled project of Walden Development. The Alternative addresses the historic buildings which exist on the site, and proposes to re-purpose these structures in an exciting and imminently feasible way.

...This Alternative is just what the site and the local residents need. The scale of the project is urban, but preserves the existing historic structures and preserves the disappearing PDR uses that are an important part of our City and the local Potrero Hill community. A project like this would be a delight to all in the vicinity including workers at the local hospital, research and tech companies, and of course local residents like myself.

...Before we create an urban disaster, I suggest that we realistically look at the current state of things, and then honestly look at the future. If we do, I think we will see that a design like the Metal Shed Reuse Alternative is the answer. (*Anasovich, Philip, E-mail, September 12, 2015*)

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I am writing to add my support to the modified Metal Shed Reuse Alternative proposed by SF City Planning. It is an appropriate compromise between the two parties and deserves support from all parts of the community. Adaptive Reuse should always be the first option for an historic building, and is so inscribed in the Central Waterfront Plan as well as in the Eastern Neighborhoods Plan.

I furthermore want to compliment SF City Planning on crafting the compromise plan. This is a true testament to your leadership and demonstration that SF City Planning serves all communities and interests of San Francisco.

You have acted like Solomon in this wise and just compromise and deserve everyone's respect. You certainly have earned mine. *(Loomis, John, E-mail, September 12, 2015)*

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Finally, I would like this overall project design to incorporate more of the ideas articulated in the 'Metal Reuse Alternative'. The Eastern edge roof line attempts to do that to some extent. *(Rudolfi, Peter, E-mail, September 15, 2015)*

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The proposed project is inconsistent with the existing scale and density of the surrounding neighborhood. The project should be reduced to something similar to the "Metal Shed Reuse Alternative" presented in the Draft EIR, Chapter VI. *(Hutson, Richard, Letter, September 17, 2015)*

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I am supportive of the adaptive reuse plan that the Planning Department has proposed as a compromise. We care deeply what happens on this part of Potrero Hill and actively invested our own time and money to promote this alternative plan.

...Additionally we would like to see the historic structure reused and expressed...

I realize that the planners and developers may have other considerations and yet urge you to really listen to the neighborhood. We have borne the brunt of recent growth in the city, much of which is appalling, (Daggett Triangle) and are asking that you support the reasonable alternate which your department has proposed. *(Anding, Nancy, E-mail, September 18, 2015)*

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The proposed plan from the Save The Hill group takes into consideration the problems we currently face here and future problems that will be created with further development. Their plan would help save the flavor of the neighborhood, respect the historic elements of the area, minimize traffic problems, and take into consideration the existing businesses in the area.

Please give the Save The Hill proposal your highest consideration. They are trying to show fairness to everyone. This is a beautiful section of the city with some of the best weather. Let's not ruin it by overcrowding it. *(Engel, Rebekah, Ermico Enterprises, Inc., E-mail, September 28, 2015)*

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The project that's ultimately approved for the Corovan site will have a huge impact on Potrero Hill for many decades to come. As a Potrero Hill resident, I believe a modified version of 'Save the Hill's "Metal Shed Reuse Alternative" drafted by City Planning should be adopted, and should replace the developer's currently proposed mega -project.

I know you've already got all the details from 'Save the Hill': I add my support to their arguments for a modified 'Metal Shed Reuse Alternative'. *(Bellerby, Dean, E-mail, October 02, 2015)*

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The neighborhood should retain some of the character and architectural heritage of the past. The project proposed for the Corovan site, is yet another example of something that is not right for our neighborhood. When I look for other past projects that seem very successful, the transformation of the old Greyhound Bus Terminal into CCA seems a great example. Here a building was transformed and re used respecting the past and making way for the future. The "Metal Shed Alternative" plan proposed seems much more in keeping with the original feel and scale of Potrero Hill. While not perfect, it represents development that would be much more in line with the wishes and needs of this community. *(Kurash, Ron and Lynka Adams, E-mail, October 02, 2015)*

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The metal buildings at the project site should be preserved because of their historical significance and incorporated, or adaptively reused, in any new development. *(Baron, Bonnie, E-mail, October 03, 2015)*

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If something must be built on the site, let it be the metal shed reuse alternative, with far fewer units and cars. *(Delacorte, Peter, E-mail, October 03, 2015)*

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I am not unaccustomed to testifying at Planning Department hearings and community meetings. But this time I find myself not testifying in favor the developer's proposal. I am testifying instead in favor of the community's design proposal in the draft Environmental Impact Report, also known as "The Metal Shed Reuse Alternative". Why?

It is the better design.

While I was always against the Kaiser project in terms of program, I did support, in theory, housing for the Corovan site. That was until I saw the Save The Hill proposal, and now the "Metal Shed Reuse Alternative" in the draft EIR. I must confess that I was completely won over by the design and the positive contribution it will make to the neighborhood.

The "Metal Shed Reuse" design is right for the site; it is right for the context. It is at a scale (with some modifications) that engages well with its surroundings. It celebrates and honors our history. It is very sustainable because it is adaptive reuse, repurposing an existing cultural resource. Adaptive reuse is always more sustainable than new construction. But this is more than adaptive reuse, it is creative adaptive



reuse and will join the other creative adaptive reuse examples such as the CCA campus that define the character of Potrero Hill and the way we choose to engage change.

... But I here want to now applaud San Francisco City Planning for its pro-active role in shaping this compromise development plan that combines partial adaptive reuse with new housing construction. I whole heartedly endorse the “Metal Shed Reuse” proposal for the Corovan site as the only responsible option and the only good design that has been offered to the public. (*Loomis, John, E-mail, October 03, 2015*)

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I am a long time resident of Potrero Hill writing you from Vancouver, Canada. I just spent a day on Granville island where there were wonderful repurposed warehouses. It was a pleasure and visual delight to walk, eat, have coffee etc. and feel a sense of place and history away from the numerous slick new buildings that dominate much of Vancouver, though I must add they always seem to breathe because of the open space that surround them plus there are numerous works of art everywhere and beautiful plantings and trees!

If I could see you in person I would BEG YOU to promote and consider the alternative plan presented by the Hill, it is crucial to the soul to have this type of alternative to what is rapidly taking over the Potrero hill neighborhood.

...We have a chance to really do something very special at this site! (*Sundell, Carol, E-mail, October 03, 2015*)

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I have attended many meetings regarding The Coravan project and have seen repeated presentations of the design scheme. I have also contributed my own opinions on how these plans could be improved upon. The Metal Shed Reuse Plan put forth by members of the concerned citizens of Potrero Hill is, I believe, a fair and wise compromise to the developer's current plan. PLEASE help us preserve a modicum of historical character in this once genuine mixed use neighborhood. Integrating these existing buildings into new homes and business creates a rich mix of old and new and serves as a reminder of diversity in our city. The message of conservation and reuse would be a loud one much like the upcycling of the old Grayhouse bus station into our current College of Arts. (*Adams, Lynka, E-mail, October 04, 2015*)

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While opposing this housing proposal, I am encouraged to support the Metal Shed Reuse Alternative, under which all the warehouse buildings on the site (1210 17th Street/975 16th Street and 1200 17th Street) would be retained and reused.

... I encourage the Planning Department to support the Metal Shed Reuse Alternative Plan as the only viable potential development for this property. (*Angles, Sean, E-mail, October 05, 2015*)

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I would like to commend the inclusion of the Metal Shed Reuse Plan in the draft EIR analysis. Continued evaluation of this community borne and viable alternative allows the Planning Commission to have a robust choice in the preferred alternative and potential mitigation measures.

...I would commend the less dense alternative Metal Shed Reuse Plan as useful to address some concerns.  
(Cpuc, Jci, E-mail, October 04, 2015)

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I am writing to urge the Planning Department to select the Metal Shed Reuse Alternative presented in the EIR for 901 16th/1200 17th Streets. This alternative is the only one in the EIR which retains and protects the surrounding environment and has the lowest impact on an already heavily traveled intersection which is under construction.

... The Metal Shed Reuse Design is just one example of a design which spotlights the character of a neighborhood while adding much needed housing. PDR space for self employed/entrepreneurs like metal shops, woodworking shops, commercial fabrics and upholstery are many of the types of businesses that define the character of Potrero Hill. These businesses are typically wholesale suppliers and not retail store fronts; thus they have low impact on traffic and parking. (Friedman, Holly, E-mail, October 04, 2015)

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Finally, I cannot overstate the significance for a big chunk of the Potrero Hill neighborhood of the adaptive reuse alternative listed in this draft EIR. I won't go into the specific reasons of this yet again here, because I feel they have been amply voiced by members of my community already. I hope that, after these and other shortcomings of the draft environmental impact report are addressed in the final version of the report, the wider implications for the neighborhood of such a project and the implications of the loss of these historic structures are not neglected as the commission decides what is best for this site, and reaches that decision based on the merits of the proposed alternatives. (Guney, Ergin, E-mail, October 04, 2015)

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I am writing to encourage the Planning Commissioners to adapt the "Metal Shed" option included in the draft Environmental Impact Review document for the addresses of 901 16th Street and 1200 17th Street. I know I speak for many when I express my regret over how much industrial architecture is being demolished so that cookie cutter condos can go in their place, but this example in particular stands out because of the location and the uniqueness and history of the structures and its potential to offset some of the eliminated and threatened arts spaces in the area and throughout the city. I urge city planning to find a way to make the "metal shed" adaptive reuse option a viable proposal. The proposal itself looks to me to be a sketch of an idea, but there are ways to make this the environmentally superior option and it is clear to me and everyone I know that this option has the best potential to satisfy the greatest number of people.

I am the Exhibitions Designer for SFMOMA and though currently do not live in Potrero Hill, I have both lived and worked in the neighborhood up until very recently, and I continue to spend a great deal of time there as well as visit artist friends and attend exhibitions in the art galleries that have recently moved into the neighborhood. I have a longstanding relationship with this neighborhood, particularly as an artist who has worked in a Dogpatch studio not unlike the Corovan metal structures. I also participated in an art exhibition about the history of this site and these buildings, and I know that there is a widespread interest in the history of these structures and in finding a way to put them to new use. They are the last structures connected to the history of Judson – Pacific and the Pacific Rolling Mills (the one in the Dogpatch having been destroyed, and one that used to be in the east bay was lost to the Ikea development.) The buildings at Mississippi, 16th and 17th Streets are truly some of the last vessels of large scale industry in Potrero Hill

proper, and if they were given new life they could house a number of neighborhood-friendly services while paying tribute to a unique role Potrero Hill has played in the city's history.

... I know a wide variety of people who care deeply about the future of this site and of the neighborhood generally, and I have never heard anyone argue against dedicating some of this site to housing or to ensuring that the site be economically advantageous to the developers, but no one I know wants the metal structures to be destroyed. No one I know wants this very interesting set of industrial structures to be sacrificed for upscale housing and chain store retail. There has to be a way of keeping these buildings as a physical reminder of the neighborhood's roots in industry and a way to update it for 21st century needs of both housing and new (but small scale) "industry" or the organizations that support local arts.

One development worth noting in this regard has been the relocation of what used to be downtown art galleries to the northwestern edge of Potrero. There is strong community interest in "connecting the dots" of the various arts organizations and imperiled artists studios that can be found along Potrero Avenue, north of 16th Street (in the form of CCA), the eastern edge of Potrero and beginning of the Dogpatch (Noonan Studios in Pier 70) and the southern Dogpatch. The neighborhood acronym "doremi" has been popularized to refer to the areas of the Dogpatch, Potrero, and Mission Bay as areas serving a vital "arts" role for San Francisco. We believe that the Corovan site could and should play a role in both "connecting the dots" of some far flung existing arts spaces and help to replenish some of the fast vanishing studio, manufacturing and exhibition spaces around this area.

I know I speak for many when I say that one of the most appealing things about Potrero Hill is its interesting mix of the industrial and residential and the old and the new. This is reflected in the diversity of architecture and the people who live and work here. That diversity can not survive unless the city plays a very significant role in carefully examining every tear-down proposal that comes down the pike.

...Furthermore, the buildings' most characteristic features are the outline, roof profile and the water tower, all features that combine to tell their own story of their previous functions. Why can't the developers put their new structure on the wide open parking lot and leave the roof line, large metal awnings and garage door openings and water tower intact and let the neighborhood retain some of its industrial character?

Today even as the neighborhood is experiencing a rise in art galleries and an expansion of the California College of Art's campus, recent building trends threaten to eliminate the few remaining reminders of Potrero Hill's industrial past and push out artists and light manufacturing that provide this neighborhood with much of its cultural appeal. In recent years I have seen the demolition of a number of the neighborhood's older and industrial structures, some of which had historical merit even if not as significant as that of the current Corovan buildings. I realize that it may not be possible or desirable in every instance to find new uses for some of the older buildings in the neighborhood, but surely it is not necessary to destroy every single industrial structure that is in the way of a would-be condo complex. This is an important opportunity, perhaps the last in this neighborhood, to prevent all of the neighborhood's industrial character from being erased. I ask that City Planning and the developers consider the potential of this site for not just housing but for artists' and other manufacturers' studios and that the buildings themselves be refurbished rather than demolished. (*Roberts, Kent, E-mail, October 04, 2015*)

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As a 30 year resident on Potrero Hill and as an architect, I am particularly sensitive to this project and its problems. I urge the Commission to not approve the EIR, and to require additional information. In fact, I would urge you to require the redesign of this project. I believe that the "Metal Shed Reuse Alternative" is a

much more satisfactory answer to the this problematic site, and additionally will offer the community much more benefits. (*Anasovich, Philip, E-mail, October 05, 2015*)

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I respectfully urge the Planning Commission to support the Metal Shed Reuse Alternative Proposal... (*Agor, Vicente, E-mail, October 05, 2015*)

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In closing, I would urge the Planning Department to seriously consider the Metal Shed Reuse Alternative plan, wherein the development would be adapted to the existing structures, and would I feel more accurately reflect our unique neighborhood's character and history. (*Angeli-Morse, Audra, Thee Parkside, Dino & Luigi Presents, E-mail, October 05, 2015*)

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In conclusion, I urge the Planning Department to do a few things:...

(3) Assert interest in the alternative plans for Metal Shed Reuse Alternative Plan and the Reduced Density Alternative Plan as described below:

... I encourage the Planning Department to support the Metal Shed Reuse Alternative Plan. (*Dangles, Robert, E-mail, October 05, 2015*)

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This location and these unique historical structures are not a suitable location for so much housing. I speak for a great many people who are identified in your documents as PDR. We support a plan to preserve the Corovan buildings in a way that extends beyond the perseveration of the small brick building and the corner edge. Save the core structures (including the water tank), provide work spaces of at least 1200 to 2400 square feet, and provide living space for a more sustainable number of apartments and you will have a winning development not just for the developer and their clients but for the whole neighborhood and city. (*Gemignani, Michael, Paragon Frames, E-mail, October 05, 2015*)

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Furthermore the inclusion of PDR in place of residential units would help mitigate some of the cumulative impacts resulting from the overbuilding of residential developments throughout the Showplace Square /Potrero Area.

PDR businesses foster a diverse economy, and ensure the City's long-term economic vibrancy. The Metal Shed Alternative incorporates plaza-like areas that would encourage interaction and build community, mixing home, work, culture and recreation. It would mean jobs for a diverse workforce and reduce some of the impacts of a large development. It would be active 24/7, ensuring safe and welcoming streets. Along with 100 Hooper and CCA, the area would emerge from a dead zone and evolve with a wonderful new synergy, a true benefit to our community. (*Heath, Alison, E-mail, October 05, 2015*)

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The Metal Shed Reuse project is at least an alternative to the current proposal. Please listen to the neighbors who live here. *(Hill, MG, E-mail, October 05, 2015)*

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I am hopeful that you will hear the concerns of the neighborhood and consider a modified version of the Model Shed Reuse Alternative proposed by Save the Hill. *(Horton, Michelle, E-mail, October 05, 2015)*

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The Planning Department's Metal Shed Plan for the Corovan site is a significant improvement over previous Walden/Prado plans. The Metal Shed Plan has a reasonable scale which compliments the neighborhood and preserves historic structures, all that remain of Pacific Rolling Mill's 80 year history in our neighborhood.

... It is ironic and sad that while corrugated metal continues to be popular in new neighborhood construction, the buildings which inspired this industrial style are disappearing quickly. The SF Opera warehouse at 800 Indiana is being torn down today, Center Hardware's corrugated metal building at 999 Mariposa will go in about a year, and I have no doubt that the SF Gravel building at 552 Berry will follow soon after. Many others are already gone. A repurposing of the Rolling Mills metal buildings for apartments and P.D.R. would serve the need for housing and employment while preserving a crucial structure which gives the neighborhood the character residents love and visitors look for. *(Linenthal, Peter, Potrero Hill Archives Project, E-mail, October 05, 2015)*

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In the project DEIR, the original proposal calls for a complete demolition of the metal buildings. The "Metal Shed Alternative" calls for the demolition of about half of them, a compromise. It would be unfortunate if the style were represented in the area entirely by out-of-context recent imitations, with no specimens of the original style with which to compare them, except further afield. *(Meroz, Yoram, Letter, October 05, 2015)*

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The site holds a unique role in our neighborhood's history, one that would best be acknowledged through adaptive reuse of the metal structures. Adaptive reuse of these structures would contribute contrast and texture to an area swiftly being overtaken by new construction. The site's location on the threshold of Potrero Hill, Mission Bay and Showplace Square is ideally situated for an architectural testament to the neighborhood's evolving narrative. At the same time, there is ample space at this large site for new construction allowing for a compromise and complementary integration of the old and the new. In fact, the variegated roof of the structures may very well be the only thing that can offset the devastating Soviet-housing inspired presence of Daggett Place across the way. *(Miller, Ruth, E-mail, October 05, 2015)*

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Save The Hill urges the City to reject the Project Sponsor's plan in favor of the "Metal Shed Reuse Alternative" (subject to some modifications) that significantly reduces various negative impacts while achieving many of the previously declared project objectives.

... The Metal Shed Reuse alternate plan proposed by City Planning incorporates the historic metal structures with new construction. This reasonable compromise should be modified to achieve an environmentally superior status and adopted as the preferred alternative.

... Finally, I'd like to underscore that the Metal Shed Reuse Alternative was inspired by an adaptive reuse proposal put together by Save The Hill – a proposal that was the result of substantial community outreach by Save The Hill over the last three years. This alternative (and not the Project Sponsor's proposal) is by far the preferred choice of the community (see STH transcript enclosure of one meeting that took place with the Project Sponsor on 2/15/14). *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

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The proposed project is inconsistent with the existing scale and density of the surrounding neighborhood. The project should be reduced to something similar to the "Metal Shed Reuse Alternative" presented in the Draft EIR, Chapter VI. *(Nicholson, Jane, E-mail, October 05, 2015)*

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The Metal Shed Reuse Alternative incorporates the historic metal structures with new construction and is the preferable option because it better conveys the impressive scale of the Pacific Rolling Mill operations. This alternative provides a fantastic opportunity to convey the industrial heritage of Potrero Hill. I request the Planning Department revise the DEIR to accurately recognize the site's historic resources and to work with the developer to achieve a reasonable compromise and successful project. *(Petrin, Katherine, Katherine Petrin Consulting, Letter, October 05, 2015)*

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I am writing to urge the City to reject the Corovan project at Mississippi Street and 16th Street as currently proposed by the developer (Prado/Walden) in favor of an adaptive reuse alternative plan, the "Metal Shed Reuse Plan" that significantly reduces various negative impacts on the Potrero Hill neighborhood. *(Pfeffer Agor, Mike, E-mail, October 05, 2015)*

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I urge the Planning Department to retain a portion of the project for light PDR / "Trade Shop" uses.

...The DEIR includes the "Metal Shed Reuse Alternative" as a counter proposal to the developer's currently envisioned project. I urge City Planning to improve upon this plan in order to make it a strong, viable, and community-based alternative that could truly serve both the developer's economic interests and the neighborhood's long-term needs. Specifically, in accordance with Save The Hill's vision for this project, I urge City Planning to recognize that the Alternative's currently designated allotment for PDR space can be for light and low impact purposes – and can therefore achieve environmental superiority to the developer's proposal.

... In summary, I believe the issues outlined above are all intimately linked:

- 1) The Corovan site has been used for PDR since the early 20th century
- 2) The increasing loss of PDR negatively affects our neighborhood character

3) The Metal Shed Reuse Alternative represents a grassroots effort by our community to honor the history and character of our neighborhood while also embracing its future. (*Smails, Arcadia, Letter, October 05, 2015*)

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As suggested by the Historic Preservation Commission, the Metal Shed Reuse alternative outlined in the Draft EIR for the site should be considered as an alternative to the currently proposed design. The Metal Shed Reuse alternative represents an exciting and viable way to preserve the integrity of the industrial structures while creating significant housing resources, artist and maker work spaces, public open space, and other needed community assets.

I also believe this alternative would create much less traffic in a neighborhood that is already experiencing serious congestion.

For these reasons I believe the Metal Shed Reuse Alternative is clearly the environmentally superior approach to this important site, and I urge City Planning to designate it as such. (*Wilson, Ralph, E-mail, October 05, 2015*)

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Fortunately, an alternative does exist – a well designed adaptive reuse project that will be an asset to the neighborhood and will serve the needs of many local constituents, not the sole need of an out-of-town developer who has, for at least four years, exhibited a tone deaf, “I’m not going to listen to the local community or care about anything other than my bottom line” attitude and seeks to claim he’s helping SF by adding housing units – but is only doing so with this latest proposal because 2000 of the people who actually live in the neighborhood signed a petition and spend two years fighting his last proposal, an ill-conceived Kaiser building, and successfully forcing him abandon it as Kaiser put their building elsewhere. Good faith is a requirement for successful, collaborative, compromising-based business dealings, and this developer has yet to show any of these qualities in his dealings with the neighborhood over his development plans. The city should remain wary of promises and skeptical of downplayed problems in evaluating the current EIR and proposal, lest all we actual San Franciscans, you included, get what we deserve from Walden & Josh Smith.

Please reject this proposal and support the adaptive reuse proposal which has been provided as a thoughtful and neighborhood-supported alternative. (*Wurtman, David, Letter, undated*)

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I currently stand against approval of any further development in the City, until you come up with compatible means of transportation for the many proposed new dwellings and business projects you review/approve. And, suggest a moratorium to allow time to come up with solutions in that regard. Remodeling and/or constructive reuse of existing stock could be an exception to that temporary rule. (*Zebroski, Chet, Erickson Zebroski Design Group, Inc., E-mail, October 06, 2015*)

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The metal shed reuse alternative is preferable because it better conveys the expressive scale of the Pacific Rolling Mill operation. I endorse the metal shed reuse alternative and see it as a fantastic opportunity to convey the industrial heritage of Potrero Hill while avoiding a more suburban residential treatment. I ask

the Planning Commission to incorporate that alternative into the final project. (*Petrin, Katherine, Transcript, October 1, 2015*)

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The reuse sheds alternative should be adopted as the preferred alternative because it's environmentally superior. It saves the most high quality, the most innovative and creative early structures of this type in the neighborhood. This is so important to this community, because this is where people on Potrero Hill were trained in trade jobs. They had an association with Lick Lormity school. They trained people to come and draw and fabricate steel with them. It is a trade school and it still exists to this day. (*Butler, Joseph, Transcript, October 1, 2015*)

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The planning department's metal shed reuse alternative designed for the Corovan site is a significant improvement over previous Walden Prado plans. This alternative has a reasonable scale which compliments the neighborhood and preserves historic structures, all that remains of Pacific Rolling Mills 80-year history in our neighborhood.

... A re-purposing of these buildings for apartments and light industry would serve today's needs for housing and employment while preserving a crucial structure which gives the neighborhood the character residents love and visitors look for. (*Linenthal, Peter, Transcript, October 1, 2015*)

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Lastly, about architecture, as has been said before, but I will say it again, there is -- I can think of about six projects along 16th and 17th Street which are faux metal shed industrial. We have them on DeHaro and 17th; we have them on 16th and DeHaro, the blue building; we have the condos before that; we have the -- it will be very ironic if we will have taken away every true metal shed industrial building and left all of these very popular, faux, modern imitations as representatives of the local style. And I urge you to follow the metal shed alternative which was entirely proposed by the community, not in -- not in Prado's original plan. (*Meroz, Yoram, Transcript, October 1, 2015*)

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The other thing I'd like to mention is my support for the adaptive reuse alternative mentioned in the report, which I believe is an opinion shared by many Potrero Hill residents. The reason, straight forward, the big part that makes neighborhoods by Potrero Hill rich and diverse is their connection to their colorful past. In the case of Potrero Hill, this is an industrial and working class. The historical buildings at the site, at the moment, are precisely the types of structures that tie Potrero Hill to this industrial past. Needless to say, we can't plan and build new ones of such historic buildings from now on. We can only lose the ones we currently have, and any example we lose is an example we won't be getting back. Therefore, I feel anything done to this site that doesn't preserve most of the current historic structures will be a missed opportunity and it will make Potrero Hill a little bit more generic. So I hope the local community's strong preference for the adaptive reuse option will be taken into account. (*Gurney, Ergin, Transcript, October 1, 2015*)

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This evening I would like to focus on the Draft EIR's metal shed reuse alternative. Save The Hill urges the Planning Commission to support that plan subject to some modifications. It was drawn-up by city, planning, but it was inspired by a mixed-use plan, Save The Hill, submitted late last year. It seems a practical middle ground between the developers project and the community's concerns. Importantly, it would retain some space for light PDR uses. It would also provide up to 177 units of housing while reducing the massive scale of the project to better match the character of the neighborhood. This plan was the outgrowth of substantial community outreach by Save The Hill over the last three years. Two weeks ago, historic preservation commissioners applauded this reuse alternative and encouraged the developer to incorporate it into a final design. The HPC Commissioners also expressed deep concern about the impact of the mass size, scale of the developer's current plan, and yet here we are today struggling with developers who, I'm sorry to say, simply refuse to listen to and respect the wishes of Potrero Hill, the majority of which I assure you has repeatedly expressed opposition to what these developers are currently proposing. We shared our alternative adaptive reuse plan with the developers earlier this year, and offered to meet with them and it was quickly rebuffed.

... I'd also like to remind the Commissioners that the City needs to independently review and confirm with qualified experts any information provided by the developers regarding economic feasibility or infeasibility to the metal shed reuse alternative, per state court case. That's case Preservation Action Council versus City of San Jose. In closing, many industrial buildings in our community, such as the Corovan site, present an extraordinary opportunity to fulfill the vision the Potrero Hill area plans call for adoptive reuse. Unfortunately, we are seeing widespread demolition of . Properties that could otherwise be adaptively reused for other purposes. Please don't let this happen. (*Minott, Rod, Transcript, October 1, 2015*)

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The metal Shed adaptive reuse alternative includes 56,000 square feet of light PDR artists and makers' space.

... While much of the focus on alternative has been on the historic merit of the buildings, it also offers a very compelling opportunity for a truly urban mixed use project. PDR businesses foster a diverse economy and assure the City's long-term economic vibrancy. The metal shed alternative incorporates plaza-like areas that would encourage interaction and build community mixing home, work, culture and recreation. It would mean jobs for a diverse workforce and reduce some of the impacts of a large development. It would be active 24/7, ensuring safe and welcoming streets. Along with 100 Hooper and CCA, the area would emerge from the dead zone and evolve with the wonderful, new synergy, a true benefit to our community. (*Heath, Alison, Transcript, October 1, 2015*)

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In closing, I would urge the Planning Department to seriously consider the metal shed reuse alternative drafted by city development wherein the developer would be adapted to the existing structures and, I feel, more accurately reflect our unique neighborhood's character and history. (*Audra (no last name given), Transcript, October 1, 2015*)

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Recommendations to preserve buildings that provide continuity with past development and honor the natural topography of Potrero Hill south of 16th Street, consider the cumulative loss of artists and makers

and repair spaces throughout the neighborhood and the city, and support an alternative proposal, one which re-purposes the industrial structures, reduces the scale and density of the developer's proposal, and combines mixed use and pedestrian-friendly spaces with new construction for housing. What the Draft EIR inelegantly identifies as the metal shed reuse alternative plan could, with some modifications, be a most elegant solution to a number of seemingly proposed aims of the developers and the community. Concerns about Traffic lack of open space, lack of adequate public transport and loss of artist and makers spaces could be addressed in combination with concerns about neighborhood history, character and community-friendly developments.

...I entreat the Planning Commission to continue their commendable work with the community and the developers to thoughtfully optimize the site's unique potential.

...The developer's proposal poses a grave threat to neighborhood congestion and encourages the slow creep of bland, boxy, profit-maximizing architecture. However, it's not too late to conclude many years of worth of dialogue, determination and outright disagreement with a rewarding compromise which balances sensitivity to the environment, the site's history and the community's future. *(Miller, Ruth, Transcript, October 1, 2015)*

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What you're hearing here, of course, and what I also support, as an alternative suggestion that is -- at least limits somewhat the scale of the project and reduces, potentially, some of these apparently intransigent issues. So there is another option, and that is the metal shed reuse alternative, slightly smaller, retains at least a semblance of the historical spirit of the Potrero Hill, and incorporates modified elements into a new proposal, which many of us think is a good idea. More importantly, perhaps, it avoids sort of the maximum application of the bulldozer, you know. We consider ourselves as residents of San Francisco -- I guess everybody does -- a progressive place to be. I personally think bulldozing is rarely progressive. So I think you have a chance here to incorporate parts of this building, modified forms, and save some of the PDR space and really promote this aggressive compromise. *(Boyd, David, Transcript, October 1, 2015)*

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And I would simply sum up my comments by supporting the metal shed reuse alternative. I think it makes a lot more sense, and although it won't mitigate all of the negative impacts that have been talked about this evening, it will certainly mitigate some of them. *(No Name Given 1, Transcript, October 1, 2015)*

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I respectfully urge the Planning Commission to support the metal shed Reuse alternative proposal and to acknowledge the limitations of the traffic data used in the Draft EIR. *(Agor, Vicente, Transcript, October 1, 2015)*

### **Response AL-2**

These comments express support for the preservation of the metal sheds, as well as specific support for the Metal Shed Reuse Alternative analyzed in the Draft EIR or a modified alternative preserving the metal sheds and/or PDR uses at the site. These comments do not specifically address the adequacy of the information or analysis presented in the Draft EIR. However, the selection of and adequate analysis of alternatives is related to support of alternatives, and is discussed in Response AL-4. The support for an

alternative that retains the metal sheds and/or PDR space as expressed in these comments is noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

**Comment AL-3: Financial Feasibility of the Metal Shed Reuse Alternative**

If the developers say it will not pencil, that is fine – just like it is not their responsibility to deal with the overall impact on traffic etc. it should not be the city's responsibility to make sure their project achieves its intended profit goals. (*Goldenberg, David, E-mail, September 11, 2015*)

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One other comment I made in person during the October 1st public hearing was about the lack of any explanation of what makes the adaptive reuse alternative listed in the draft report infeasible for the developer. I believe this, too, received some mention during the commissioners' responses after that session, roughly to the effect that the developer may not be expected to spell out exactly why an option was considered infeasible. While I have no basis to argue against the validity of that assessment in terms of laws or regulations, I see a problematic aspect of that approach in general. If there's nothing that forces a developer to justify why a particular proposal listed in an environmental impact report is considered infeasible, I don't see what would stop any developer from listing any number of alternatives and designating only the one with the worst environmental impact as being the feasible one (simply because it's the most profitable for that developer) while arbitrarily designating all the alternatives with lower impact as infeasible. I realize that this does not necessarily mean that the developer's chosen solution will necessarily be approved by the commission, but it does leave the door open for misleading the commission as well as imbuing the developer with a false sense of flexibility with respect to being open to alternatives; not to mention the fact that this practice would routinely deprive the city of development options that could be of greater benefit to local communities while still producing a reasonable amount of profit for the developer. (*Guney, Ergin, E-mail, October 04, 2015*)

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Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code §21002.1), the discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if the alternative would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines §15126.6(b)). By its inclusion in the DEIR, the Metal Shed Alternative is deemed to be feasible and capable of reducing the impacts of the proposed project.

When approving a project under CEQA, an agency must make specific findings to support any determination that mitigation or alternatives are infeasible. Stating that a project may be infeasible from an economic standpoint is not appropriate. Furthermore, any such claims by the developer that a project is economically infeasible must be independently reviewed and confirmed. (*Preservation Action Council. v. City of San Jose*) (*Heath, Alison, E-mail, October 05, 2015*)

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Moreover, the DEIR fails to address the project sponsor's allegation that the Metal Shed Reuse Alternative is infeasible. City Planning has not conducted "independent analysis" of Prado/Walden (Potrero Partners) claims that the Metal Shed Reuse Alternative remains infeasible.

...Moreover, the City, again, needs to independently review and confirm with qualified experts any information provided by the Prado/Walden (Potrero Partners) regarding economic feasibility or infeasibility of the Metal Shed Reuse Alternative, per state court case *Preservation Action Council v. City of San Jose*, 2006, 141 Cal. App.4th 1336. To date, no substantial evidence finding infeasibility of the Metal Shed Reuse Alternative has been provided/submitted. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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In addition, per California state court case *Preservation Action Council v. City of San Jose* 2006, the City must independently review and confirm any information provided by the developers regarding economic feasibility or infeasibility of the Metal Shed Reuse Alternative. (*Smails, Arcadia, Letter, October 05, 2015*)

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So I hope the local community's strong preference for the adaptive reuse option will be taken into account. And I can see that this alternative has been counted out in this draft report for being infeasible, but I have encountered no explanation or details about that, so one thing I'd like to ask for is some specifics on what makes adaptive reuse alternative feasible, if it can be incorporated into the final report maybe or if the developer could make it available, somehow, it would be appreciated. (*Gurney, Ergin, Transcript, October 1, 2015*)

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There was a question about the feasibility and infeasibility justification, I guess economically. Somebody brought that issue up saying there was a case somewhere that somebody had to prove it was not feasible or infeasible. That's a provocative statement that was mentioned, and I don't know what the case law is on that. So I would love to hear -- we have these kinds of things come up quite frequently, and -- I know there's a point somewhere that is feasible -- there is no way to really prove that you kind of go from gut feeling based on the number of units that are reduced. (*Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015*)

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I just want -- I want to keep it real specific to the language of the EIR. I think the first big issue that I want to bring up and see reflected in the record is I'm concerned that the inclusion of the metal shed reuse alternative doesn't really meet the CEQA rule of reason. It's pretty open-ended. But one of the things that the rule of reason does talk about is that it says that you want to choose alternatives that can form the public participation and the discussion of the decision-making body, so the commission, the board of supervisors; And part of that -- part of that way that you do that is by looking somewhat at feasibility, which can be determined in a number of different ways. And I think including an alternative that you can argue about the reasons, but that the project's sponsor who is sponsoring what we are considering the quote, unquote, project, the purposes of CEQA, has said that the project is financially infeasible, but yet we've included it anyways. And I think it skews the informed public participation and the discussion that the commission has around alternatives for the project. I think it skews the conversation around what is the environmentally superior alternative, and I even think it skews which alternatives were not analyzed in detail in the EIR. So I would like to have a little bit more of an explanation as to why that alternative was included, and how it sort of meets that sort of CEQA rule of reason. (*Commissioner Johnson, San Francisco Planning Commission, Transcript, October 1, 2015*)

**Response AL-3**

These comments relate to the financial feasibility of the alternatives and the inclusion and analysis of an alternative that may not be financially feasible. CEQA requires an EIR to consider a range of “potentially feasible” alternatives (CEQA Guidelines 15126.6(a)). While financial feasibility can be considered when assessing the feasibility of a project, lack of financial feasibility cannot be used to determine that an alternative would not be feasible without substantial evidence. Full analysis of financial feasibility is not required to be included in an EIR if financial feasibility is not used to make conclusions regarding choice of the alternatives. Contrary to contentions in some of the comments, the Draft EIR’s assessment of the alternatives (pages VI.32-VI.33) does not dismiss alternatives as financially infeasible. As noted in the Draft EIR, the financial feasibility of the alternatives has not been proven or disproven through substantial evidence (Draft EIR pages S.24, VI.5, VI.13, and VI.34), though it was noted that the project sponsor contended the Metal Shed Reuse Alternative would not be financially feasible (VI.27). Page VI.27 of the Draft EIR is revised as follows to clarify that the alternative is considered to be potentially feasible:

The Metal Shed Reuse Alternative would achieve some of the project sponsor’s objectives for the project. Because this alternative would allow for redevelopment of the site with a mix of residential and commercial uses including open spaces, but at a density that is substantially less than the proposed project, objectives regarding the development of a mix of uses on an underutilized site, and contribution to the City’s regional housing needs, would be achieved to a lesser extent than the proposed project. The Metal Shed Reuse Alternative would also comply with the UMU District zoning and the existing height and bulk requirements for the site and preserve the historic brick office building. While the City considers this alternative to be potentially feasible, the The project sponsors contend that this alternative ~~would~~ fail to meet the objective to develop a financially feasible project. Because the intensity of proposed uses would be substantially less than that of the project, some of the project sponsor’s objectives would be achieved, though to a substantially lesser extent than the proposed project.

This revision does not change the analysis or conclusions of the Draft EIR. Analysis of the financial feasibility of the alternatives will become part of the administrative record before decision-makers and may provide evidence for the adoption of CEQA Findings regarding alternatives.

Response AL-4 further discusses the choice of alternatives for analysis in the Draft EIR. As discussed above, the Draft EIR evaluated *potentially* feasible alternatives and meets standards for adequacy of an EIR and review of alternatives including the rule of reason in Sections 15151 and 15126.6 of the CEQA Guidelines.

**Comment AL-4: Adequacy of the Alternatives Analysis, Support Specifically for the Reduced Density Alternative or Generally for an Alternative, or Suggestion of an Different Alternative**

The Potrero Hill neighborhood, as many neighborhoods in the city, finds itself inundated with new architecture. Change for the city is inevitable, but the quality of these new building goes from boring blandness to depressing mediocrity. The architects involved in these projects are forced to create designs that they would prefer not to do; the buildings are built out to maximize square footage with the maximum height limitation the only stopping point. Big bulky buildings with shear facades are the rule. Niceties are thrown in to appease angry local neighborhood groups, and changes are very reluctantly made to soften the impact of these structures.

I would respectfully like to propose another approach to urban design in the city, that has particular resonance for this project at 16th and Mississippi Streets. Let us create Density Limits. For a neighborhood like Potrero Hill let us set a maximum number of units per acre. The famed and successful Arkansas Lofts projects has 63 units per acre; let us set a maximum of 65 dwelling units per acre as a goal. In addition we can allow an increase of 30% to this number, if the developer saves all historic structures on site and also preserves and reuses a minimum of 50% of existing buildings on site. By the way, I do not include closet-sized apartment units.

Should the developer wish to build office and commercial uses into the site, if that is allowable by zoning, the maximum allowable square footage would be an area of 150% of the net site. In all this there would be no change to the height limits already established by the Eastern Neighborhoods guidelines.

If such Density Limits were established in sensitive and historic neighborhoods such as Potrero Hill, I think we would discover a resurgence in the quality of architectural design in the city. Freed from the need to overbuild their projects, architects would no longer be forced to create monster-apartment buildings, and would find the task of rebuilding San Francisco much more rewarding. (*Anasovich, Philip, E-mail, September 12, 2015*)

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Solutions can be elegant leaving neighborhoods in better shape. Isn't that what you and your colleagues would rather be a part of? (*Iaconi, Mara, E-mail, September 13, 2015*)

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The problems with the DEIR include:...7) Inaccurate and Inadequate Study of Alternative Project Proposal (*Glicken, Sarah, E-mail, September 25, 2015*)

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To consider a project that would in fact meet the stated and true intent of UMU zoning the EIR must include a genuine Mixed Use Alternative such as that detailed in the amended table on the reverse side of this page.

As a matter of general Eastern Neighborhood UMU policy, the Planning Department should establish a minimum requirement of 0.5 FAR of PDR spaces, including Arts and Trade Shop uses, for all large new developments in the UMU districts.

This would require about (the exact amount of PDR space needs design analysis to be pinned down) 76,000 sq ft of PDR space for this proposed project. It can be accommodated in the ground floor of the 16th Street building. It would replace all the retail except in the retained existing buildings (the Potrero Hill Neighborhood really does not need any more restaurants), the retail parking, and the 12 ground floor housing units now proposed there.

Therefore, to minimize the Project's traffic impacts, the garage under the 16th Street building should be eliminated, leaving only the 125 spaces under the 17th Street building. And this is very important issue regarding the cumulative development analysis due to the expected very significant traffic impacts on the 16th Street corridor of the pending Arena development.

For legal adequacy per CEQA, the EIR must include a True UMU Reduced Parking Alternative. (*Yerba Buena Neighborhood Association, Letter, October 01, 2015*)

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My dream would be that the city buys the land from Josh Smith and does something truly wonderful with the property. A reuse and open space that's safe and less dense for that corner. The community over here in the eastern neighborhood have been hit hard with development. Please consider the safest and fairest choice for us. (*Musse, Jani, Email and Videos, October 02, 2015*)

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While I support this plan with height limits at 58 feet along 16th Street and 48 feet along 17th Street, I ask that any added height for mechanical/stair penthouses be capped at 68-feet, instead of 74.5 feet. (*Loomis, John, E-mail, October 03, 2015*)

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Prior to finalizing the plans for the proposed building at 1601 Mariposa, I would like to see:...

\* A meaningful reduced density alternative that eliminates at last on story or more of the residential building complex along 16th Street, widens the pedestrian "alley" along the western side of the development by at least 20 feet, and includes commercial space along 17th Street. (*Firpo, Janine, E-mail, October 04, 2015*)

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If Save the Hill, a neighborhood group can prepare a design that respects the integrity of the neighborhood, then certainly the developer with their financial resources and knowledge of building can design an equally or improved design which would be mutually beneficial for everyone. (*Friedman, Holly, E-mail, October 04, 2015*)

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If any new use should be proposed for 901 16th Street and 1200 17th Street, the parcel should be proposed for city acquisition as new public open space and recreational facilities for the benefit of forecasted expanding numbers of new residents on Potrero Hill and schoolchildren at Live Oak School and International Studies Academy. Our community is desperately needed recreation and open space in our increasingly congested neighborhood. (*Angles, Sean, E-mail, October 05, 2015*)

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At the moment, the Potrero Hill Archives Project's collections are overflowing their home, a small storage room in my basement. A storage & display space for the Potrero Hill Archives Project in the Walden/Prado development would be a great neighborhood benefit, helping preserve neighborhood history while connecting it to our future. (*Linenthal, Peter, Potrero Hill Archives Project, E-mail, October 05, 2015*)

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The unique circumstances of this site call for a far less dense project than what the developers have thus far proposed. Planning is urged to consider alternate proposals, ones that reduce the negative impacts on traffic, air quality and historic resources. *(Miller, Ruth, E-mail, October 05, 2015)*

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Currently the adaptive reuse alternative project allows for 177 units of housing and retains the existing metal buildings. While Save The Hill is willing to support this plan with height limits at 58 feet along 16th Street (including mechanical penthouses) and 48 feet along 17th Street (including mechanical penthouses), we ask that any added height for mechanical/stair penthouses reflected in the current Metal Shed Reuse renderings (16th Street northeast corner) be capped at 68-feet, instead of 74.5 feet. Save The Hill is more than willing to work with both the developer and City Planning to improve this alternative as a workable solution.

... The DEIR includes analysis of a “Reduced Density” alternate plan that is identified as “environmentally superior”. While Save the Hill supports reduced density, this plan does not nearly go far enough. Under this alternate plan, the height, scale and massing of the developer’s current project proposal would remain essentially unchanged. The “Reduced Density” plan would contain 122 fewer residential units. However, the subtraction of space from these units is used to expand an interior private “pedestrian mews” for residents of the project. Thus, the private space is replaced with a different type of private space rather than the provision of open space. Moreover, commercial space that would benefit the community is dramatically reduced in this plan.

The DEIR should include a meaningful reduced density alternative – one that eliminates at least one story or more of the residential building complex along 16th Street, widens the pedestrian “alley” along the western side of the development by at least 20 feet, and includes commercial space along 17th Street. The east-west “pedestrian mews” should be open and accessible to the general public. Heights (including mechanical penthouses) should be capped at 48 feet along 17th Street and 58 feet along 16th. If added height is required for a mechanical/stairway penthouse on the northeast 16th Street corner of the proposed project then this additional height should be capped at 68 feet.

... Furthermore, the project sponsor should be expected to invest in more traffic reducing strategies and should collaborate with both the community and City Planning on an alternate proposal to achieve this outcome. The project sponsor proposes a very ambitious, large-scale development for a very sensitive site, and it is reasonable that they shoulder more of the responsibility for traffic reducing measures in the surrounding area. A significant reduction in the density of the project is only one way they could positively mitigate traffic problems posed by their proposal. *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

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Please reject this project, or at a minimum send it back to the drawing board with a mandate for reduced scale and density that is more consistent with the existing built environment of Potrero Hill.

... I must repeat what I said in the beginning- Please reject this project... or return it for a mandate for a reduction of scale and density. *(Nicholson, Jane, E-mail, October 05, 2015)*

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I'm Peter Linenthal and I live at 18th and Mississippi on Potrero Hill since 1975, and I direct the Potrero Hill Archive project. For 29 years, we've collected and made available photos, oral histories, and really anything to do with Potrero Hill history.

...The Potrero Hill Archive Project is overflowing its current home, a small storage room in my basement. A storage space in Walden Project's development dedicated for storage, display and organizing the archive collections would be a great neighborhood benefit preserving -- and making it available. (*Linenthal, Peter, Transcript, October 1, 2015*)

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Another approach to urban design in San Francisco that has particular residents for this project at 16th and Mississippi Streets would be the creation of density limits. Based on factors such as neighborhood character, historic value and existing density, each neighborhood could be given a recommended density and also a maximum allowable density of housing units per acre. For a neighborhood like Potrero Hill, the Planning Commission should consider the well known and successful Arkansas Lofts projects which has 63 units per acre. Perhaps a maximum of 65 dwelling units per acre could be used as a goal for the new limits. It might also make sense to allow an increase of 20 percent to this number if the developers say it's all historic structures on-site, and also preserves and reuses a minimum of 50 percent of existing buildings on this site. Existing height limits would remain in effect. If such density limits were established in sensitive and historic neighborhoods such as Potrero Hill, I think we would discover a resurgence of quality in architectural design in the city. Freed from the need to overbuild the projects, architects would no longer be forced to create monster-sized apartment buildings, and would find the task of rebuilding San Francisco much more rewarding. I know that the San Francisco Planning Commission is considering the creation of design guidelines. I believe density limits would be an excellent start. (*Anasovich, Philip, Transcript, October 1, 2015*)

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But all said, Josh certainly has attended and helped the neighborhoods understand many projects, and is the kind of guy who's willing to say, okay -- of course, I'll get in trouble for this, probably, but 17th Street should be the east/west connector for transit, for bicycles, not 16th Street, not any of the others. So the big hurdle is, there's a track that runs right at the end of 17th Street before it gets to UCSF, if we could build just a pedestrian overpass. And I think we could get Josh to help with that. (*Boss, Joe, Transcript, October 1, 2015*)

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I prefer the reduced project alternative in this case, mainly -- I don't know if it is a better project, but I think it does reduce the significant and unavoidable problems of traffic and transportation. (*Woods, Corinne, Transcript, October 1, 2015*)

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I entreat the Planning Commission to continue their commendable work with the community and the developers to thoughtfully optimize the site's unique potential. This entails updating traffic studies and other environmental data used in the Draft EIR, revisiting the considerations of historic integrity, acknowledging the need for a development that significantly lessens the density and height of the developer's outside's proposal. (*Miller, Ruth, Transcript, October 1, 2015*)

Regarding the EIR, there's a question of density height and will form the mandate of the 2008 Eastern Neighborhood Plan is for complete neighborhoods consideration for appropriate density to match the existing development. Potrero Hill, the Hill, is on a hill, which is always a different kind of density in a different kind of Urban form. The DEIR should include a reduced density alternative or a hybrid of a reduced alternative together with the retention of some form of shed PDR space. The monotonous use of over-residential in this part of Potrero Hill is of concern to me. UMU implies urban mixed use, and we are packing significant high numbers of housing into one area which almost makes a field density and urban forms of Mission Bay are spilling underneath the freeway, up the hill, and that is of concern to me. I do believe that the project, just by the demand of the complete neighborhoods, should take on a more broken down, smaller, incremental scale rather than creating these oversized blocks, which I think we will regret in the future, as they do not distinguish our institutional neighborhoods like Mission Bay from our residential neighborhoods. And I'm not talking just about densification. I'm talking about the way densification is achieved. There is EIR for the extent we are replacing 100,000 square feet of PDR primarily by housing. The issue we have not addressed to restate my form, is what is the mixed use? That is also a significantly Town Square neighborhood, Commercial Street forming element which we sometimes talk about but there is no provision of that discussion. It has an independent impact element for this transformation. (*Commissioner Moore, San Francisco Planning Commission, Transcript, October 1, 2015*)

#### **Response AL-4**

The basis for the development and analysis of project alternatives is described on pages VI.1 through VI.3 of the Draft EIR. Section 15126.6(a) of the CEQA Guidelines provides that “[a]n EIR need not consider every conceivable alternative to a project. Under the “rule of reason” governing the selection of the range of alternatives, the EIR is required “to set forth only those alternatives necessary to permit a reasoned choice” (CEQA Guidelines, Section 15126.6 [f]). This section also requires the presentation of a reasonable range of alternatives. Although an EIR must consider a reasonable range of potentially feasible alternatives, it does not have to identify and analyze alternatives that would not meet most of the project sponsor’s basic objectives, nor does it have to discuss every possible variant or permutation of alternatives, alternatives that are overly speculative in nature, or alternatives that do not further reduce or eliminate significant impacts of the project. The alternatives identified and evaluated in the Draft EIR were developed on this basis.

In addition to the proposed project, the Draft EIR identified two alternatives to the project and the required No Project alternative. These alternatives were developed with the intention of reducing the environmental impacts of the proposed project while still meeting most of the project’s basic objectives, key requirements for the development of project alternatives in an EIR. The Draft EIR also discusses why additional alternatives were rejected from further consideration, including variations on an alternative featuring retention of metal sheds/PDR space, and other on- and off-site alternatives. The Metal Shed Reuse alternative was chosen as a reasonable alternative that would retain the metal sheds and PDR space while meeting Planning Code requirements and most of the basic project objectives and presents a comparison of impacts for such an alternative against those of the proposed project. The Reduced Density Alternative was chosen to address intersection impacts. The choice of discrete alternatives is intended to demonstrate the comparative impacts of different alternative actions and does not preclude decision-makers from approving a hybrid project that includes a mix of characteristics from the proposed project and/or multiple alternatives.

To respond to the comment questioning the definition of “mixed-use” and appropriateness of the mix of uses proposed, the UMU district does not specifically require any one type of use, but rather provides maximum allowances by type of use in floor area ratio limits for non-residential uses, maximum square feet for retail uses, vertical controls for office space (generally not on the ground floor except in historic buildings), and reliance on height and bulk limitations and minimum unit mix (40% two-bedroom or larger units) for residential uses. To quote the Eastern Neighborhoods Showplace Square/Potrero Hill Area Plan (pages 3 and 4): “Portions of Showplace / Potrero have been transitioning from PDR to a more mixed use character. These areas center around 8th and Brannan, east of the freeway and along 16th and 17th Streets. Over time, portions of these areas, on formerly industrial land, have evolved and now contain some office, housing, retail and other uses. This mix of uses contributes to the vitality of Showplace/Potrero and should be maintained and promoted, while the core design and showroom portion of Showplace Square is protected.” (The project site is not located in the referenced “core design and showroom portion of Showplace Square.”) The proposed project includes, within allowances by type of use under the UMU zoning, residential units, ground-level commercial space, and public and private open space. While new development is intended to mix with remaining PDR uses in the UMU district, there is no requirement that the new developments themselves include PDR space. The inclusion of PDR space is not a requirement to consider a project to be “mixed-use.” Therefore, the proposed mix of uses would not conflict with requirements of the UMU district such that this question could enter the realm of the environmental analysis and is therefore not further discussed in this EIR. That being said, decision-makers can consider the mix of uses proposed when considering approval of the project or an alternative.

Specific recommendations beyond those suggesting variations of alternatives already considered include the following. An alternative with additional public open space would not reduce significant impacts of the project, which already exceeds public open space requirements and does not have a significant impact in this regard. An alternative with reduced height would not reduce significant impacts of the project, which does not have a significant impact related to height, such as those related to views or shadows, except as it can relate to density, which is already addressed in the Reduced Density Alternative. A reduction in traffic by further reducing parking provisions beyond existing City constraints would likely result in less vehicle trips from the proposed project, but it may not reduce vehicle trips to a level that would result in less-than-significant impacts at impacted intersections or further than the performance standard set forth in Mitigation Measure M-TR-2c, specifying implementation of a TDM Plan with a vehicle trip reduction goal of 10 percent.

The comments generally suggest minor variations of alternatives already considered, a combination of alternatives already considered, or alternatives that do not address significant impacts of the project. The comments do not suggest specific additional alternatives that would avoid or mitigate potentially significant environmental impacts of the proposed project while meeting most of the project sponsor’s objectives, or those that would offer substantial environmental advantages, or be more feasible than the alternatives analyzed in the Draft EIR (CEQA Guidelines, Section 15204 [a]).

As discussed above, the Draft EIR evaluated a reasonable range of alternatives, as required by CEQA that allows City decision-makers and the public to evaluate and compare the potential impacts of the proposed project with other similar development scenarios designed to lessen the project’s environmental effects and the Draft EIR meets standards for adequacy of an EIR per Sections 15151 and 15126.6 of the CEQA Guidelines. Comments related to additional alternatives that do not reduce identified environmental impacts or modification of presented alternatives will be considered by decision-makers. City decision-makers will consider the range of alternatives presented and comments received, and may approve,

disapprove, or modify the proposed project or one of the project alternatives through their approval actions on the proposed project.

**Comment AL-5: PDR in the Metal Shed Reuse Alternative**

This is blatant City planning fraud: “Bait and Switch.” The total lack of sincerity is so deep that PDR is not even listed as an existing or possible use in the Summary of Alternatives Table VI-I (see reverse side of this page). How telling! (*Yerba Buena Neighborhood Association, Letter, October 01, 2015*)

**Response AL-5**

This comment states that PDR use is not included in the alternatives. This comment is incorrect. The referenced Table VI-1 (page VI.4 of the Draft EIR) details specific uses proposed under the project and alternatives. The artist workspace and exhibition space listed in this table are considered PDR uses, as described in the text discussion on page VI.27, totaling 55,323 square feet of PDR use included in the Metal Shed Reuse alternative.

**Comment AL-6: Assessment of PDR Loss for the Alternatives**

Although no mitigations for the cumulative loss of PDR space were identified in the PEIR and a Statement of Overriding Considerations accepted some loss of PDR in the *Eastern Neighborhoods PEIR*, the Metal Shed Adaptive Reuse Alternative impacts on PDR should be studied in the context of other alternatives. This analysis was omitted from the DEIR even though the Metal Shed Alternative includes a significant amount (55,000 sf) of new PDR space onsite. Arguably, with this analysis included, this would be the environmentally superior alternative as it would reduce transit impacts and maintain half of the PDR space that would be completely lost with the Reduced Density Alternative. (*Heath, Alison, E-mail, October 05, 2015*)

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So I think the more elaborated historic metal shed alternative, I think, is desired for us to make an informed decision as we're looking at the final EIR. (*Commissioner Moore, San Francisco Planning Commission, Transcript, October 1, 2015*)

**Response AL-6**

These comments question the adequacy of analysis of loss of PDR in the Draft EIR and the related determination of the environmentally superior alternative given the retention of PDR space under the Metal Shed Reuse Alternative. Contrary to the statement that the Draft EIR did not include such an assessment for the alternatives, the analysis of the loss of PDR is included under the subheading “Land Use Impacts” in the assessment of each project alternative in the Draft EIR (pages VI.5, VI.14, and VI.27), with conclusions summarized on page VI.33.

Loss of PDR was analyzed for the proposed project in the CPE Checklist (pages 25 and 26, included as Appendix A to the Draft EIR). As acknowledged in the CPE Checklist and repeated in the Draft EIR (page VI.1), the proposed project would result in the loss of 109,500 square feet of PDR space, which would be considered a considerable contribution to the cumulative loss of PDR space identified as a significant impact in the *Eastern Neighborhoods PEIR*. No retention of PDR space is required under the existing zoning of the project site (UMU) applied by the Eastern Neighborhoods Plan, and the Eastern Neighborhoods Plan

EIR identified no mitigation applicable to the project site that would avoid or reduce this impact, citing policy conflicts with goals for development of the area. Also see Response LU-1 for additional discussion regarding loss of PDR.

The analysis of the Metal Shed Reuse Alternative in the Draft EIR acknowledges that this alternative would reduce the contribution to the cumulative impact related to loss of PDR to a loss of approximately 54,000 square feet. For purposes of this EIR, although automobile delay is a significant impact due to the timing of the Draft EIR comment period and the Planning Commission adoption of Resolution 19579, it is otherwise no longer considered as such. Were automobile delay not considered a significant impact, the Metal Shed Reuse Alternative would be considered the environmentally superior alternative because it would rehabilitate some PDR uses. (See Chapter II of this document for revisions related to consideration of VMT in place of automobile delay analysis and related revisions to the Draft EIR, including addition of the previous statement to the discussion of choice of alternatives. With these revisions, both alternatives would be considered environmentally superior to the proposed project.

Therefore, as discussed above, the analysis of project alternatives, including consideration of the impact in relation to loss of PDR, was adequately addressed in the Draft EIR per CEQA Guidelines sections 15151 and 15126.6, and has been further revised per Planning Commission Resolution 19579 related to analysis of traffic impacts.

## F. LAND USE AND PLANNING

The comments and corresponding responses in this section cover topics in Section 1, Land Use and Land Use Planning of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment LU-1: PDR Job/Use Loss

### **Comment LU-1: PDR Job/Use Loss**

The Corovan site at 901 16th street is one of the few remaining active PDR properties in Potrero Hill. I object to the alternatives presented in the EIR which eliminate or reduce PDR space because of the drastic change that would result in the character of Potrero Hill.

As a long time resident of the Hill, I moved here because of the mix use of buildings. The reason I live in Potrero is to be among a thriving community that supports PDR space and it's industrious and creative residents. I value the balance of PDR and residential properties in Potrero Hill. The planning department can work under CEQA to retain the character of the neighborhood while it works with developers to create responsible housing growth.

... Planning needs to protect and foster PDR in Potrero Hill and work with developers to design properties that are truly mixed use and not 100% residential. If Planning supports the design proposed by the developer of 901 16th street it is saying that PDR space does not matter. (*Friedman, Holly, E-mail, October 04, 2015*)

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I am also currently an advisor for the Minnesota Street Project ([Minnesotastreetproject.com](http://Minnesotastreetproject.com)<<http://Minnesotastreetproject.com>>), a project that I believe is both relevant to the 901 16th Street and 1200 17th Street developments and could complement or serve as a model to some aspects of this site. My colleagues and I are very committed to contributing to this neighborhood's community of artists and creators of all sorts, and it is evident that the neighborhood supports projects that cultivate this commitment. The areas of Potrero and the Dogpatch have a long and distinguished history of providing makers spaces that other neighborhoods do not want or for whatever reasons do not allow. We are currently witnessing the erosion of these kinds of spaces as more and more housing appears to be prioritized over other vital roles for land use and other kinds of architecture. There is a great deal of community support for preserving the industrial structures and maintaining some connection between the site's purpose and the role of makers (something this neighborhood is known for past and present). (*Roberts, Kent, E-mail, October 04, 2015*)

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My second concern is for the PDR businesses in this neighborhood, which lately I have seen diminish in number at an alarming rate. We who have lived many years in the city have perhaps come to take for granted the small businesses that feed, clothe, entertain and employ us—businesses that I feel give the city its essential character. Take away these businesses from any established, urban neighborhood—especially one built on industry—and you are left with the same sterile, antiseptic, suburban landscape that many of the people now colonizing said neighborhood escaped from. A landscape peopled by high-end, itinerant workers with no vested interest in its current status nor in its future. The 16th and 17<sup>th</sup> street corridors

alone have lost multiple PDR's in the last few years that have all been replaced by new, giant, multi-unit, market-rate housing. The same goes for Showplace Square and Dogpatch. As an art student who grew up in the Marina I used to come to Potrero Hill to the many light industrial artisans to have canvas stretched, a custom steel brace made for a final project, soldering, welding, printing and even a custom cart built with casters to move gear and props for shows. Every one of these businesses has since closed down, but not over a period of 10-20 years. All have gone away in the last two years. What does this say about our city? I now find that I have to go to Oakland to get these things. Why do I have to go to Oakland when I live in SAN FRANCISCO??? I believe that San Francisco is doing exactly what the US has done with its industrial and manufacturing base, and that has left this country suffering for jobs and dependent on foreign nations for the things we used to make at home. I don't want to be dependent on businesses in Oakland when I come from a city known for its talent and innovation.

I understand that things change, but there is good and bad change. More often I see San Francisco changing to meet the wants of the transient newcomers instead of keeping the feel of its illustrious heritage and longtime residents. San Francisco has always been a vibrant and interesting city. To someone visiting or seeing a glimpse of the city in a movie or photo they get their first impressions from the architecture. Why now are we homogenizing this city's beautiful landscape with suburban, outlet-mall architecture? Why would you allow the construction style of suburban sprawl in the city that prides itself on the The Painted Ladies and so much other beautiful architecture? Far older cities across the globe manage to grow and still keep the beauty of their architectural heritage. Why can't we do the same? I find it very hard to believe that San Francisco's development vanguard lacks the vision and talent to accomplish this. Please do not sell us out as a city. Do not lower the bar for short money. San Francisco is far too special for that. (*Angeli-Morse, Audra, The Parkside, Dino & Luigi Presents, E-mail, October 05, 2015*)

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LAND USE OBJECTIVES IGNORED: The UMU (Urban Mixed Use) zoning for this project does not honor the Showplace Square/Potrero Hill Plan's Objective 6.1 to "support the economic well being of a variety of businesses". This new proposal for housing will result in the displacement of current tenant Corovan jobs, many of them viable PDR and blue-collar jobs. Most of the development's square footage will be devoted solely to residential use. The extent of the cumulative loss of PDR space was not fully anticipated in the Eastern Neighborhoods' FEIR (Final EIR) and merits further study. (*Angles, Sean, E-mail, October 05, 2015*)

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I am completely appalled that these buildings which are the last of their kind in Potrero Hill (now that the Women and Children's hospital destroyed the one that was at Third and Mariposa) might be destroyed for more of the same high end housing. As planners I hope that your role in planning helps you see beyond the housing hype and that you understand how important it is we not scrub away all our warehouse structures and how artists and related work like mine also deserve to be "housed" in this city.

I specialize in fabricating frames and display cases. I work in the southern part of Potrero Hill and service clients throughout the city. My clients typically have short timelines and they need deliveries in a timely manner and they often need to visit me and my workspace in person. The nature of what I do makes it unrealistic to be located outside of the city if I am to be successful.

In 1999 I was told to leave the 4000 square foot clear span wooden truss warehouse I had been working in for 10 years at Natoma and Lafayette Streets because the building would be torn down and 12 apartments would take its place. The building was originally the Otis Elevator repair shop and it had a number of

unique architectural features. For example, the floor was covered completely in 2" high heartwood blocks – not something you come across everyday. The building was torn down without regard to its history or architectural uniqueness. I was lucky enough to find a 4000 square foot space in a 40,000 square foot metal warehouse in the Eastern Neighborhoods where I still work and build displays for art collectors, frame shops and museums. If my luck holds out I'll be here another 5 years. My point is, the space I was able to find is in a building much like the ones where the Corovan business is currently located. Many of my colleagues and I are grateful that this area of the city has helped us maintain work space in the city (maybe not as central as my former location but close enough to maintain our city work relationships). While my current location does not have nearly as colorful a history as the Corovan buildings, it serves a very important role not just for me personally but for the city's economy overall.

No one questions the fact that Victorian housing deserves to be protected from demolition but warehouse structures should also be considered for their historic and functional value and they can service far more people in far more ways than a Victorian house would. The buildings at 901 16th and 1200 17th Streets have much more going for them than any of the workspaces I know of in terms of history and unique industrial attributes. Anyone with integrity would grasp the opportunity to preserve and reuse them and set aside some space for professions like mine. We have done this in a handful of other examples in other parts of the city (the Allied Box Building on Folsom between 17th and 18th would be one prime example) but we need more. I am speaking on behalf of businesses like mine who count on the city to keep stock available in which to work. (*Gemignani, Michael, Paragon Frames, E-mail, October 05, 2015*)

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My overarching concerns include inaccurate cumulative impact assumptions, the project's incompatibility with the objectives of several established land use plans, and the loss of PDR.

... This project would eliminate 109,500 square feet of PDR building space and displace a number of PDR and blue collar jobs. As noted in the CPE checklist, page 26, the development "would contribute considerably" to significant cumulative land use impacts related to loss of PDR. Although the *Eastern Neighborhoods PEIR* anticipated a certain level of development, the actual cumulative loss of PDR appears to be quickly approaching projections and such uses may soon be extinct on the north side of Potrero Hill. (*Heath, Alison, E-mail, October 05, 2015*)

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The proposed project would eliminate rather than retain 109,000 square feet of valuable Production, Distribution, and Repair space. The DEIR acknowledges this loss as a significant impact but nonetheless defends it as consistent with planning goals. The DEIR does not consider this proposed development in the context of broader, unanticipated, PDR losses across the City. This is yet another example of how the DEIR fails to incorporate new and accurate data. A clear remedy at this site would be to retain some portion of the project for light PDR, or "Trade Shop", uses.

...For the DEIR to fulfill its purpose, it must include updated data reflecting neighborhood growth and it must acknowledge Area Plan principles developed and accepted by the community. Among other things, the cumulative loss of PDR to the City has not been accurately addressed and evaluated in the DEIR, and we ask that this study be conducted. Since the extent of the cumulative loss of PDR space was not fully anticipated in the 2008 Eastern Neighborhoods' Environmental Impact Report and no mitigations were identified, these impacts require further study in the EIR for this project. Analysis should include a full



exploration of feasible mitigations such as the inclusion of new low impact PDR space onsite. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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One of my biggest concerns with the Draft EIR is that it relies on outdated reports and data and in doing so, does not take a holistic view of development in Potrero Hill. Here are a few examples:

The Draft EIR acknowledges that the proposed project eliminates 109,000 square feet of valuable Production, Distribution, and Repair space, BUT defends it as consistent with planning goals. The DEIR does not consider this proposed development in the context of broader, unanticipated, PDR losses both in our neighborhood and across the Eastern Neighborhoods. The DEIR fails to incorporate new and accurate data. A clear remedy at this site would be to retain some portion of the project for light PDR, or “Trade Shop” uses. The loss of space for artists, makers and repair spaces is huge. It doesn’t allow people to live and work in the same neighborhood and changes the fundamental nature of a single family home neighborhood (*Pfeffer Agor, Mike, E-mail, October 05, 2015*)

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The proposed project eliminates over one hundred square feet of Production, Distribution, and Repair space in a neighborhood that has a strong history of such building uses. In this instance the destruction and displacement of even more PDR space – and the jobs that accompany them – will add to a growing and lopsided approach by City Planning that prioritizes housing and retail over PDR even to the detriment of a neighborhood as a whole. Within the Potrero Hill and Dogpatch neighborhoods alone we have already lost (or are soon to lose) a significant number of PDR spaces, including:

- 950 Tennessee Street, a two story industrial building now home to Watermark Press
- The former Opera warehouse on Indiana Street
- The ProCamera shop and former bank building built in 1917 on 20th and 3rd Street
- The former Atlas Café on 16th street (a former PDR space beloved for its character)
- The Hsin Tung Yang building on 19th and Tennessee (under threat of demolition)

To view the demolition of these buildings individually, in isolation from one another, is to overlook the cumulative impact of losing the history, and industrial vernacular, of all of them at once. The DEIR does not consider this proposed development in this broader context and it fails to incorporate the data necessary to create such context. I urge the Planning Department to retain a portion of the project for light PDR / “Trade Shop” uses.

... In summary, I believe the issues outlined above are all intimately linked:

- 1) The Corovan site has been used for PDR since the early 20th century

2) The increasing loss of PDR negatively affects our neighborhood character

*(Smails, Arcadia, Letter, October 05, 2015)*

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Perhaps overlooked in our focus of the residential pipeline is the irrevocable loss of PDR as we overbuild residential units. The sites for this project were zoned for urban-mixed zoning. Area Planned Policy 1.1.2 instituted UMU land use controls specifically to protect against the wholesale displacement of PDR uses. Despite this, Showplace Square and Potrero Hill are experiencing the greatest loss of PDR of any of the eastern neighborhoods, an amount equivalent to east Soma and the Mission combined. As proposed, this project would eliminate nearly 110,000 square feet of active PDR space to build a massive housing complex. To put this in perspective, the so-called beast on Bryant would have eliminated 64,000 square feet. Keeping stable jobs in our neighborhood means employment for people from diverse backgrounds by using the nexus formula of one worker for every 300 square feet of PDR. The proposed conversion to residential use in the single development equates to loss of 367 potential PDR jobs. *(Heath, Alison, Transcript, October 1, 2015)*

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My second concern is for the PDR businesses in the neighborhood, which lately I have seen diminishing in number in an alarming rate. We who have lived many years in the city have come to perhaps take for granted the small businesses that feed, clothe and entertain and employ us, businesses that I feel give the city its essential character. Take away these businesses from any established neighborhood, especially one built on industry, and you are left with the same sterile, antiseptic suburban landscape that many of the people now colonizing said neighborhood escaped from, a landscape people by high-end itinerant workers with no vested interest in its current status or its future. The 16th and 17th Street corridors alone have lost multiple PDRs in the last year that have all been replaced by new, giant, multi-market rate housing. The same goes for Showplace Square and Dogpatch. As an art student who grew up in the Marina, I used to come to Potrero Hill to the many light industrial artisans to have canvas stretched, a custom steel brace made for a final project, soldering, welding, printing and even a custom cart built with casters to move gear and props for shows. Every one of these businesses has since closed down, but not over a period of ten or 20 years. All have gone away in the last few years. What does this say about our city? I know find I have to go to Oakland and beyond to get these things. Why do I have to go to Oakland when I live in San Francisco? I believe that San Francisco is doing exactly what the U.S. has done with its industrial and manufacturing base, and that has left this country suffering for jobs and dependent on foreign nations for things we used to make at home. I don't want to be dependent on businesses in Oakland when I come from a city known for its talent and innovation. I understand that things change, but there is good and bad change. More often I see San Francisco changing to meet the wants of the transient newcomers instead of keeping the field with its illustrious heritage and long-term residents. *(Audra (no last name given), Transcript, October 1, 2015)*

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Recommendations to preserve buildings that provide continuity with past development and honor the natural topography of Potrero Hill south of 16th Street, consider the cumulative loss of artists and makers and repair spaces throughout the neighborhood and the city, and support an alternative proposal, one which re-purposes the industrial structures, reduces the scale and density of the developer's proposal, and combines mixed use and pedestrian-friendly spaces with new construction for housing. What the Draft

EIR inelegantly identifies as the metal shed reuse alternative plan could, with some modifications, be a most elegant solution to a number of seemingly proposed aims of the developers and the community. Concerns about Traffic lack of open space, lack of adequate public transport and loss of artist and makers spaces could be addressed in combination with concerns about neighborhood history, character and community-friendly developments. *(Miller, Ruth, Transcript, October 1, 2015)*

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The loss of PDR we heard before wasn't supposed to be replaced in eastern neighborhoods. There was a statement regarding considerations in the planned EIR on that. It does worry me overall. Looking at this site, looking at all of the other sites cumulatively it does concern me a bit. *(Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015)*

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I also want to point out that I saw some inconsistencies in the interpretation of a couple of different things. The first was the interpretation and the use of the statement of overriding considerations on the loss of PDR space. In certain areas we had language that makes it sound like we are saying that the loss of PDR space is an impact, even though we have the statement of overriding consideration that says we are accepting that loss. And then there are other parts where we say loss of PDR is not an impact for the same, exact reason, because we have the statement of overriding considerations that says that we are previously, as part of the plan area, accepting loss of PDR space. So the loss of PDR space in any given project, a cumulative loss of PDR space, isn't an impact because we are saying we accepted it already. So I would just like to see some consistency on how we are interpreting and using that statement of overriding considerations. *(Commissioner Johnson, San Francisco Planning Commission, Transcript, October 1, 2015)*

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There was a discussion about loss of production, distribution and repair that should also be threading into the EIR. *(Commissioner Moore, San Francisco Planning Commission, Transcript, October 1, 2015)*

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Very well put, Commissioner Johnson, on the confusion around the PDR, seeing that there was significant impact that it was mitigated by overriding considerations, I would like to see more consistency there. It really did confuse me. *(Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015)*

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Yeah, I think part of this question about the PDR was answered earlier today when we talked about eastern. Neighborhoods. And after ten years of extensive discussions between all stakeholders it was sort of decided this area that had previously all been industrial and zoned M, half of it was zoned UMU and other zoned uses that would be non-PDR areas and other areas that were reserved just for PDR. And I think that's one reason why, depending on how the zoning is, why we can have overriding circumstances, if the zoning was such that other uses were encouraged while it's not outlawing PDR use entirely. So, I think we have to, kind of look to PDR where PDR was zoned during the Eastern Neighborhood's plan. And we have some core PDR areas that are largely under-utilized further south in the city. So, this

probably may, to some degree, explain how there can be somewhat of a conflict in the language that we're using. (*Commissioner Antonini, San Francisco Planning Commission, Transcript, October 1, 2015*)

### **Response LU-1**

These comments express concerns related to the loss of Production, Distribution and Repair (PDR) uses at the project site as a result of the project and cumulative loss of PDR uses and space. The proposed project is consistent with the Eastern Neighborhoods Plan, which acknowledged loss of PDR jobs and spaces would occur on sites such as the project site that were rezoned UMU, rather than PDR, and would contribute to the related Significant and Unavoidable cumulative impact identified in the *Eastern Neighborhoods PEIR*. (See page 26 of the CPE Checklist.)

Other sites in the Eastern Neighborhoods were rezoned PDR, a zoning designation that prohibits some uses in order to retain and encourage the development of additional PDR space. The mitigation identified in the PEIR for the Eastern Neighborhoods Plan does not apply to the project site (it focused on preserving PDR in Western SoMa).

As noted in the Draft EIR (page S.3):

The proposed project would also contribute to a significant and unavoidable impact identified in the *Eastern Neighborhoods PEIR*, as discussed in the CPE for this project (page 26). The *Eastern Neighborhoods PEIR* determined that adoption of the Eastern Neighborhoods Area Plans would result in an unavoidable significant impact on land use due to the cumulative loss of PDR (Production, Distribution, and Repair). While land use controls in Western SoMa were identified as possible mitigation, this was determined not to be feasible and would not be applicable to the proposed project in any case, as the proposed project is not located in that area. A Statement of Overriding Considerations was adopted by the City accepting this significant impact because retention of the PDR uses would conflict with planned growth of the area. The proposed loss of 109,500 square feet of existing PDR uses represents a considerable contribution to the loss of the PDR space analyzed in the *Eastern Neighborhoods PEIR*, but would not result in new significant impacts that were not identified or more severe impact than analyzed in the PEIR.

In response to requests for clarification, the following text is added (in double-underline) to similar statements on the following pages of the Draft EIR: S.4, S.24, III.5, V.2, and VI.34 to make clear the distinction that the project would contribute to an impact previously identified in the *Eastern Neighborhoods PEIR*, as follows:

The proposed loss of 109,500 square feet of existing PDR uses represents a considerable contribution to the loss of the PDR space analyzed in the *Eastern Neighborhoods PEIR*, but would not result in new significant impacts that were not previously identified, or more severe impacts than were analyzed, in the PEIR.

These revisions do not change the analysis or conclusions of the Draft EIR. These changes are fully detailed in Section V of this document.

## G. POPULATION AND HOUSING

The comments and corresponding responses in this section cover topics in Section 2, Population and Housing of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment PH-1: Affordable Housing
- Comment PH-2: Adequacy of Population Analysis

### **Comment PH-1: Affordable Housing**

I'd like to encourage on-site below market housing that exceeds the planning required limit. (*Bogiages, Jean, E-mail, September 17, 2015*)

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In addition to concerns about this specific site and these specific buildings, City Planning is urged to not make Potrero Hill shoulder a disproportionate burden of an affordable housing crisis, a crisis that history has shown can not be solved by building market-rate monolithic megastructures. (*Miller, Ruth, E-mail, October 05, 2015*)

### **Response PH-1**

These comments relate to the provision of below market (or "affordable") housing.

As described in the Draft EIR (page III.5 and III.6), the proposed project would be subject to Planning Code Sections 415 and 419 (Inclusionary Affordable Housing Program and UMU District Requirements). Specifics of how the proposed project would satisfy affordability requirements have not yet been determined (on-site, off-site or payment of the Affordable Housing Fee) and will be considered prior to project approval.

The affordability of housing is not related to an environmental topic, impact, or threshold and therefore this is not a comment on the environmental analysis in the Draft EIR. These comments are noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

### **Comment PH-2: Adequacy of Population Analysis**

The problems with the DEIR include...5) Inadequate and Inaccurate Study of Population / Housing (*Glicken, Sarah, E-mail, September 25, 2015*)

### **Response PH-2**

This comment states that the study of population and housing was inadequate and inaccurate. Population and Housing was addressed in the CPE Checklist (pages 26 and 27 of the CPE Checklist, included as Appendix A of the Draft EIR). The *PEIR* concluded that an increase in population in the Area Plan neighborhoods is expected to occur as a secondary effect of the proposed rezoning and that population increase would not, in itself, result in adverse physical effects, but would serve to advance key City policy objectives, such as providing housing in appropriate locations next to Downtown and other employment

generators and furthering the City's Transit First policies. The *Eastern Neighborhoods PEIR* determined that the anticipated increase in population and density would not result in significant adverse physical effects on the environment. No mitigation measures were identified in the PEIR.

Also see the related response to topic LU-1 discussing development under the Eastern Neighborhoods Plan.

As documented in the CPE Checklist, the proposed project, which would add approximately 695 residents to the project site, would not result in significant population and housing impacts that were not previously disclosed in the *Eastern Neighborhoods PEIR*. Therefore, pursuant to CEQA Guidelines Section 15183, and as described in Section I of this RTC, the analysis of population and housing is adequate and no additional environmental review of this topic is required for the proposed project.

## H. NOISE

The comments and corresponding responses in this section cover topics in Section 5, Noise of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment NO-1: Noise, General
- Comment NO-2: Noise, Train Horn
- Comment NO-3: Noise, Construction

### **Comment NO-1: Noise, General**

After reading the DEIR for the proposed Corovan development at 901 16th, I am saddened that yet another mega housing project, exceeding historical height limits by more than 20 feet with disregard for parking needs, noise reduction and most of all solutions to traffic mitigation may very well slam another pile of, excuse my profanity, shit onto the residents of Potrero Hill. (*Iaconi, Mara, E-mail, September 13, 2015*)

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This Corovan Project is of great concern to all of us who live in this area. The rush hour traffic is out of hand already in this highly congested area. A new freeway ramp should be built due to the increase of the UC hospital, ballpark and all the new apartment buildings that have been built within the last 5 years. There is so much noise, pollution, traffic now that this area is not even a family oriented, livable place. (*Hill, MG, E-mail, October 05, 2015*)

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The DEIR for 901 16th / 1200 17th Streets, and the underlying Eastern Neighborhoods EIR, do not specifically address or adequately analyze potential noise impacts on the proposed residential project from the Bottom of The Hill music venue. Mitigations are also not adequately addressed. These should be included for additional analysis in the draft and final EIR. A noise assessment study completed for the City dated October 20, 2014 remains inadequate. The assessment, prepared by Charles M. Salter Associates Inc., was too limited in scope. Only two weekdays in April were sampled ... which were likely not representative of busy weekend or weekday evenings at the Bottom of The Hill. Moreover, only one acoustic monitor was used on 17th Street at a mid-block location that was not accurately representative of the planned close proximity of residential housing to Bottom of The Hill. Additional study should be done for the EIR employing monitors at several locations along 17th Street over a robust period of time. This additional monitoring should reflect busy weekend and weekday evenings at Bottom of The Hill. The City's current assessment did not disclose which specific weekday evenings were sampled. Without these measures, conflicts with surrounding businesses over noise and parking will remain inevitable given that 135 units of housing are proposed by the developers on 17th Street. Robust mitigations (more than thickened glass treatments for the new residences) need to be identified in the DEIR. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

**Response NO-1**

These comments either express general concerns about noise or specific concerns that the analysis was not adequately addressed because of limited noise sampling and mitigation that does not accurately address noise from Bottom of the Hill.

Noise was addressed in the CPE Checklist (pages 31 to 35, included as Appendix A of the Draft EIR) and referenced a complete Environmental Noise Assessment, which is available for review at the Planning Department as part of Case File No. 2011.1300E. As specified in the Environmental Noise Assessment, long-term continuous noise measurements were performed at three locations between Wednesday April 2 and Friday April 4, 2014. These dates included noise measurements of both workday rush hour vehicle and pedestrian traffic levels as well as concerts at the Bottom of the Hill nightclub each night.<sup>23</sup> The monitoring locations were placed along each of the project frontages at the project site, including one in the approximate mid-way point of the project's 17<sup>th</sup> Street frontage. While Bottom of the Hill is not located directly across from the project site or the monitoring location, specific locations of the nearby noise sources were taken into account for the noise modeling (detailed on page 7 of the Environmental Noise Assessment). Additionally, per recent case law, CEQA does not require an agency to consider the impact of environmental conditions on future project users, but rather limits the CEQA analysis to effects of the project on the environment.<sup>24</sup>

Ground floor uses along 17<sup>th</sup> street closest to the Bottom of the Hill venue have been designed to not include residential units and instead include a fitness area and residential lobby/lounge and retail uses (see project plans and elevations on pages II.9, II.13, and II.20 of the Draft EIR). The Environmental Noise Assessment includes diagrams identifying minimum upgraded sound transmission class (STC) ratings for windows and doors by location and floor and where upgraded walls would be required to meet internal noise standards (Figures 3 through 6 in the Environmental Noise Assessment). These STC ratings are provided for the proposed project in Table 5 of the CPE Checklist, on page 33.

The City has also adopted Ordinance 070-15 related to noise regulations for residential uses near Places of Entertainment (known as the POE Ordinance). The POE Ordinance provides that existing places of entertainment not become nuisances on the basis of noise impacts on new nearby residents and requires attenuation of exterior noise for new residential structures and review by the Entertainment Commission as part of the approval process. The proposed project would comply with the POE Ordinance and the Environmental Noise Assessment and specifics of acoustical design will be additionally reviewed by the Entertainment Commission and the Department of Building Inspection prior to issuance of building permits.

Therefore, as discussed above, the analysis of noise impacts, including noise from Bottom of the Hill, was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project.

<sup>23</sup> Bottom of the Hill event calendar for April 2014 can be accessed at <http://www.bottomofthehill.com/iC201404.html>.

<sup>24</sup> California Building Industry Assn. v. Bay Area Air Quality Management Dist., (December 17, 2015) 218 Cal.App.4th 1171, Case No. S213478. ("CBIA v BAAQMD")



**Comment NO-2: Noise, Train Horn**

In addition you are proposing to house people in an area with two crossings that should not ever be eligible for a quiet zone due to the public interest in the crossing warnings include an audible train horn to warn those near the tracks. Quiet enjoyment will be impaired. (*Cpuc, Jci, E-mail, October 04, 2015*)

**Response NO-2**

This comment questions whether the project location is appropriate for residences given the nearby train crossings and associated horns. Noise was addressed in the CPE Checklist (pages 31 to 35, included as Appendix A of the Draft EIR) and referenced a complete Environmental Noise Assessment. The Environmental Noise Assessment included the existing Caltrain crossing and related horns blown for the 16<sup>th</sup> Street crossing and projected the possibility of high speed rail usage of this crossing and related increases in horns. The blowing of train horns is explicitly called out on page 5 of the Environmental Noise Assessment as a dominant noise source in the project's existing and future noise environment. The STC ratings noted above in Table 5 of the CPE Checklist are based upon the measured noise levels at the project site, which account for all noise sources in the area (including train horns).

As noted under Response NO-1, per recent case law, CEQA does not require an agency to consider the impact of environmental conditions on future project users, but rather limits the CEQA analysis to effects of the project on the environment.<sup>25</sup> Thus, the effects of train horn noise on future residents would not be considered an impact under CEQA, even if not already addressed, as described above.

Therefore, as discussed above, the analysis of noise impacts, including train horn noise, was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project.

**Comment NO-3: Noise, Construction**

DEIR needs to take notice of adjacent school and school children. ALT school should not just be a footnote in this document. Including treatment of toxic dust during construction and noise. (*Cpuc, Jci, E-mail, October 04, 2015*)

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As stated previously, the EN PEIR, did not accurately account for the current or anticipated level of cumulative development in the Showplace Square/Potrero Hill Area. Noise impacts from multiple construction projects proceeding at the same time merit additional study. (*Heath, Alison, E-mail, October 05, 2015*)

**Response NO-3**

These comments question the adequacy of analysis of construction-period noise impacts given the level of cumulative development in the area and proposal for the ALT school nearby. Noise was addressed in the CPE Checklist (pages 31 to 35, included as Appendix A of the Draft EIR) and referenced a complete

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<sup>25</sup> California Building Industry Assn. v. Bay Area Air Quality Management Dist., (December 17, 2015) 218 Cal.App.4th 1171, Case No. S213478. ("CBIA v BAAQMD")

Environmental Noise Assessment. Mitigation Measure F-2 of the *Eastern Neighborhoods PEIR* requires a project-specific construction-period noise attenuation plan to minimize impacts from construction-period noise such that construction noise would not contribute significantly to cumulative noise impacts. Specifics of construction activities at the site and related construction noise were modeled in the Environmental Noise Assessment (pages 8 through 10) and effectiveness of noise attenuation measures assessed. As concluded in the Environmental Noise Assessment and presented in the CPE, with a project-specific noise attenuation plan including the measures specified in Mitigation Measure M-NO-2, the proposed project would not result in either project-level or cumulatively significant construction noise impacts.

In regard to potential construction noise impacts to the proposed Alt School, an application for a Preliminary Project Assessment for a change of use from retail and auto repair uses to Institutional - Educational (Alt School) at 1240 17<sup>th</sup> Street was submitted to the Planning Department on August 18, 2015, subsequent to publication of the CPE Checklist and Draft EIR. At the time of preparation of this RTC, the Alt School has put its application on hold (in March 2016) as it pursues alternate locations instead. Because the Alt School project was not officially proposed at the time of publication, it was considered speculative, and therefore included as a footnote only in those documents. School children are considered sensitive receptors for a number of environmental effects, including noise impacts; however, residential uses are also assumed to potentially include children and infants, which are considered receptors of at least the same level of sensitivity. Residential uses and associated sensitive receptors have already been assumed to be located as close as the property line of the proposed project. Therefore, the analysis of noise impacts in the CPE Checklist and mitigation discussed above would also be adequate to characterize and mitigate potential noise impacts to a school and no additional analysis or mitigation would be warranted.

Therefore, as discussed above, the analysis of construction-period noise impacts was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project.

## I. AIR QUALITY

The comments and corresponding responses in this section cover topics in Section 6, Air Quality of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment AQ-1: Construction Air Quality
- Comment AQ-2: Operational Air Quality

### **Comment AQ-1: Construction Air Quality**

AIR QUALITY: Studies are obsolete and fail to consider the current conditions of cumulative construction under way right now. Recently, all existing Potrero Hill neighbors have witnessed major increases in black dust invading our homes and outdoor surfaces. We have witnessed failures at nearby construction sites to properly control and monitor dust. Watering down is not an adequate mitigation, particularly under windy conditions. Alternate measures should be provided. (*Angles, Sean, E-mail, October 05, 2015*)

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Impacts from cumulative conditions with multiple developments under construction within several blocks of each other should be considered as a whole rather than simply analyzed in terms of individual projects. The ENP PEIR did not anticipate the actual level of development already taking place in the Area and the mitigations contained in the PEIR are not adequate. Recently we have witnessed failures at nearby construction sites to properly control and monitor dust. Watering down is not proving to be an adequate mitigation, particularly under windy conditions. Alternate measures should be provided. (*Heath, Alison, E-mail, October 05, 2015*)

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It looks like this is mostly an industrial area and construction issues in this case are minimum, mostly - construction; work hours of construction, staging of materials, dust control, noise, vibration, safety barriers, street closures and etc. However the project should still have a phone number with a contact names to call for concerns. (*Hong, Dennis, E-mail, October 05, 2015*)

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Furthermore, the DEIR does not acknowledge nor consider the fact that a kindergarten through 8th grade school (a sensitive site receptor) operated by the ALT School plans to open its doors in an adjacent building (99 Missouri Street) in the Fall of 2016. A change of use for the building was filed on or around 9/03/15.

... The DEIR should address and analyze the potential risks of a new children's school (AltSchool) locating next to the Corovan site and detail mitigation measures that go well beyond what is currently planned. The California Department of Toxic Substances should also be involved in monitoring and coordinating this effort to ensure the safety of both children and neighbors. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

**Response AQ-1**

These comments relate to concerns about the adequacy of the analysis of construction-period air quality including cumulative construction projects in the area. The *Eastern Neighborhoods PEIR* specified that individual development projects would be subject to significance determination based on Bay Area Air Quality Management District (BAAQMD) criteria for this topic. Accordingly, a complete Air Quality Analysis was prepared for the project, which is available for review at the Planning Department as part of Case File No. 2011.1300E and was used to address Air Quality in the CPE Checklist (pages 35 to 41, included as Appendix A of the Draft EIR). The Air Quality Analysis included analysis of construction-period air quality and assessment of effectiveness of mitigation consistent with BAAQMD recommended guidelines and thresholds using San Francisco modeling for the Air Pollutant Exposure Zone to determine localized health risk, which were set to determine project-specific impacts as well as contribution to cumulative impacts. The localized health risk analysis performed in the City's modeling is cumulative in nature. Based on the results of this analysis, with implementation of construction-period emissions reduction measures specified in Mitigation Measure M-AQ-1, which require cleaner construction equipment than may otherwise be at the project site, and compliance with the San Francisco Dust Control Ordinance for construction dust, the proposed project would not result in either project-level or cumulative significant impacts related to construction-period air quality.

In regard to potential construction-period air quality impacts to the proposed Alt School, an application for a Preliminary Project Assessment for a change of use from retail and auto repair uses to Institutional - Educational (Alt School) at 1240 17<sup>th</sup> Street was submitted to the Planning Department on August 18, 2015, subsequent to publication of the CPE Checklist and Draft EIR. At the time of preparation of this RTC, the Alt School has put its application on hold (in March 2016) as it pursues alternate locations instead. Because the Alt School project was not officially proposed at the time of publication, it was considered speculative, and therefore included as a footnote only in those documents. School children are considered sensitive receptors for a number of environmental effects, including air quality impacts; however, residential uses are also assumed to include children and infants, which are considered receptors of at least the same level of sensitivity. Residential uses and associated sensitive receptors have already been assumed to be located as close as the property line of the proposed project. Therefore, the analysis of air quality impacts in the CPE Checklist and mitigation discussed above are adequate to characterize and mitigate potential air quality impacts to a potential school and no additional analysis or mitigation would be warranted.

Therefore, as discussed above, the analysis of construction-period air quality impacts was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project.

**Comment AQ-2: Operational Air Quality**

AIR QUALITY: Studies are obsolete and fail to consider the current conditions of cumulative construction under way right now. Recently, all existing Potrero Hill neighbors have witnessed major increases in black dust invading our homes and outdoor surfaces. We have witnessed failures at nearby construction sites to properly control and monitor dust. Watering down is not an adequate mitigation, particularly under windy conditions. Alternate measures should be provided. (*Angles, Sean, E-mail, October 05, 2015*)

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Additionally the impacts to air quality from the increased traffic due to cumulative increases in population were not considered fully in the ENP PEIR. Existing and cumulative conditions must be studied further.

Air quality in the vicinity of the proposed project is already getting worse before the area has begun to experience fully anticipated levels of growth. *(Heath, Alison, E-mail, October 05, 2015)*

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This Corovan Project is of great concern to all of us who live in this area. The rush hour traffic is out of hand already in this highly congested area. A new freeway ramp should be built due to the increase of the UC hospital, ballpark and all the new apartment buildings that have been built within the last 5 years. There is so much noise, pollution, traffic now that this area is not even a family oriented, livable place. *(Hill, MG, E-mail, October 05, 2015)*

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I have lived in numerous neighborhoods of the city prior to Potrero Hill, and I have never had to clean soot off my windowsills with such frequency. It is hard to imagine how the nearby impending developments will worsen the already deplorable air quality and the dire traffic congestion situation, and harder still to understand how anyone with the ability to curb more negative impacts would fail to do so. *(Miller, Ruth, E-mail, October 05, 2015)*

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Increased traffic from the proposed high-density development will significantly impact air quality and erode quality of life in the neighborhood. This impact was not adequately addressed in the DEIR, nor in the underlying Eastern Neighborhoods EIR -- both specifically at the Corovan site and in the cumulative. City Planning continues to rely on outdated analysis from the Eastern Neighborhoods Environmental Impact Report produced in 2007 - 2008. The Potrero Hill area continues to develop at a greater pace than originally anticipated by City Planning yet there appears to be no baseline analysis of current air conditions. Recent study and news reports have raised alarm about the growing danger and risk to public health of traffic-related pollution -- most especially to children. The project specific and cumulative impacts on air quality have not been fully considered and evaluated in the DEIR. *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

### **Response AQ-2**

These comments relate to concerns about and adequacy of the analysis of operational air quality including increased traffic emissions from cumulative development in the area. A complete Air Quality Analysis was prepared for the project, which was used to address Air Quality in the CPE Checklist (pages 35 to 41, included as Appendix A of the Draft EIR), and was not further addressed in the EIR. The Air Quality Analysis included analysis of localized health risks as well as contribution to regional criteria air pollutants following BAAQMD guidelines and thresholds. The Air Quality Analysis analyzed both the potential for project-specific impacts and contribution to cumulative impacts, and included assessment both of project impacts to other sensitive land uses as well as the appropriateness of the site for new sensitive uses (residential). The conclusions of the Air Quality Analysis and CPE in relation to operational air quality are summarized below. Construction-period air quality is addressed in Response AQ-1.

Consistent with BAAQMD guidelines, criteria air pollutants are a regional concern and impact analysis is performed to determine whether a project's contribution would substantially contribute to cumulative conditions. The Air Quality Analysis concluded that the project would generate emissions at the site and from vehicles generated by the project, but that operational criteria air pollutant emissions would be below

established threshold levels and that the proposed project therefore would not significantly contribute to cumulatively worsening air quality.

The project site is located within an Air Pollutant Exposure Zone as defined by the San Francisco Building and Health Codes Article 38, which requires an Enhanced Ventilation Proposal to be approved by the Department of Public Health (DPH). Compliance with Article 38 would require that indoor air quality meets residential standards at the proposed project.

Per recent case law, CEQA does not require an agency to consider the impact of existing environmental conditions on future project users, but rather limits the CEQA analysis to effects of the project on the environment.<sup>26</sup> Thus, the effects of existing air quality on future residents would not be considered an impact under CEQA, even if not addressed through existing regulations, as described above.

The project would include a backup diesel generator, which is a standard feature to address emergency conditions for buildings of this size and would need to be tested regularly. Given the project's location near residences, Mitigation Measure M-AQ-2 would require the engine to meet higher emission standards that would reduce particulate emissions by 89 to 94 percent compared to uncontrolled sources and the potential contribution of the generator to health risks in the area would be less than significant.

Therefore, as discussed above, the analysis of operational air quality impacts was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project.

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<sup>26</sup> California Building Industry Assn. v. Bay Area Air Quality Management Dist., (December 17, 2015) 218 Cal.App.4th 1171, Case No. S213478.

## J. RECREATION

The comments and corresponding responses in this section cover topics in Section 9, Recreation of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment RE-1: More Public Open Space/Parks Impact
- Comment RE-2: Shadowing on Daggett Park

### **Comment RE-1: More Public Open Space/Parks Impact**

Additionally we would like to see ... the green areas open to the public. Our neighborhood is sorely in need of park space which is currently under developed. (*Anding, Nancy, E-mail, September 18, 2015*)

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The problems with the DEIR include:...3) Inadequate & Inaccurate Analysis of Recreation & Open Space (*Glicken, Sarah, E-mail, September 25, 2015*)

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RECREATION NEGATIVE IMPACTS: Recreation impacts are not fully addressed. The addition of new residential households would result in an increased demand on Jackson Playground. The Draft EIR relies on outdated projections and doesn't account for cumulative impacts. It points to onsite public and private open space to fulfill recreation needs for residents. (*Angles, Sean, E-mail, October 05, 2015*)

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The east-west "pedestrian mews" should be open and accessible to the general public. (*Firpo, Janine, E-mail, October 04, 2015*)

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The DEIR fails to address the cumulative impacts of development on already overtaxed open space. Some of the studies and research in the PEIR analysis of Parks, Recreation and Open Space relied on data that is as old as the 2000 census. The conclusion on page 49 of the CPE Checklist, that "implementation of the Eastern Neighborhoods Rezoning and Area Plans would not result in substantial or accelerated deterioration of existing recreational resources or require the construction or expansion of recreational facilities that may have an adverse effect on the environment" is not accurate. It doesn't recognize that we are already exceeding population projections, or that there will be significant impacts resulting from the proposed project combined with past, present and reasonably foreseeable future projects.

The PEIR for the Eastern Neighborhoods and analysis done by SFRPD used a baseline neighborhood population from the year 2000 (page 370 of the PEIR) rather than looking at the current or projected neighborhood population. No specific mitigation measures were identified in the EIR despite the anticipation that, "increases in the number of permanent residents without development of additional recreational resources could result in greater use of parks and recreational facilities, which could result in physical deterioration".

The Showplace Square/Potrero Hill Plan specifically stated that the area has “comparatively little access to open space compared with the rest of the city and that the addition of new residents makes it imperative to provide more open space to serve both existing and new residents, workers and visitors.”

Primarily consisting of playing fields, Jackson Park is already heavily used and suffering from maintenance issues. Cumulatively, the addition of more than 3000 new residents in the immediate area will place a substantial strain on Jackson Park and result in the net loss to the neighborhood of recreational facilities, and further deterioration of the park. Unfortunately there is only one acre of additional open space proposed, and as yet undeveloped, at EQR Potrero. This is entirely contrary to the 4 acres of new space promised in the Showplace Square/Potrero Hill Plan<sup>13</sup>, and the 1-acre/1000 residents “Need Factor” promoted in the 2007 Eastern Neighborhoods Needs Assessment.

It is imperative that a full analysis and project-specific mitigation measures such as the inclusion of additional open space onsite be included as part of the project EIR. (*Heath, Alison, E-mail, October 05, 2015*)

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The project has done an excellent job with the court yard/s and pedestrian promenade. (*Hong, Dennis, E-mail, October 05, 2015*)

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In my and my group's opinion, the draft EIR presented fails to adequately consider the impact of the developer's proposal on our open and recreational space. Potrero Hill already currently suffers from inadequate parks, open space and recreational facilities.

There are many development projects proposed for our neighborhood and this will mean thousands of additional residents that will put significant additional strain on nearby parks including Jackson Park. While quaint, the park is already heavily used and lacking in sorely needed maintenance upgrades and renovations.

My other concern is that the majority of so-called open space provided in the developer's currently proposed project would remain private and off limits to the public.

As a community resident, I would like to see a revised EIR that includes data and projections which account for the dearth of recreation and open space and the degree to which developments already in the pipeline will further tax these inadequate resources.

Also, the addition of a east-west pedestrian mew, open to the public, would be strongly desired. The north-south pedestrian alley of the developer's project should also be widened by 20 feet and include more green soft scape.

Lastly, I recommend that Planning should offer mitigations, including the addition of new parks (Like the open lot across the street from the proposed project, next door to The Bottom of the Hill Club) that achieves the four acres promised by the City in prior planning reports. (*Hotacsu, Ayse, Friends of Jackson Park, E-mail, October 05, 2015*)

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The current EIR on the Corovan site reflects the current state and outlines best approaches and constraints on the following areas :...

- Green space...

The plans for the Corovan site (395 units of housing + more than 24,000 square feet of retail) are in line with the current state of activity along 16th Street near 7th Street with 1000 Potrero at Daggett Triangle. This has set the pace and direction for future development in the area - including a public green space onsite to the project. More green and open space are always good. (*Huie, Bruce, Dogpatch Now, E-mail, October 05, 2015*)

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These penthouses only serve to enable private views via access to amenity rooftop decks for high-paying building tenants. They should not be credited as legitimate open space.

... The DEIR fails to adequately consider the impact of the project sponsor's proposal on our open and recreational space. Potrero Hill currently suffers from inadequate parks, open space, and recreational facilities. The addition of thousands of residents from this and other new large developments will put significant additional strain on nearby parks including Jackson Playground – already heavily used and lacking in maintenance upgrades. Moreover, the vast majority of so- called open space provided in the developer's currently proposed project would remain private and off limits to the public. The DEIR fails to acknowledge or address this.

The DEIR should include data and projections accounting for the dearth of recreation and open space and the degree to which developments already in the pipeline will further tax these inadequate resources. Planning should offer mitigations, including the addition of new parks that achieve the four acres promised by the City in prior planning reports. The project sponsor's proposal should be revised to provide more open space accessible to the general public. For example, Planning should require the east-west "pedestrian mews" remain open to the public and not privately closed off space. The north-south pedestrian alley of the developer's project should also be widened by 20 feet and include more green soft-scape. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

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People of general public are not allowed to be able to meander through the properties and access other streets from the property, and I think that is a consideration a lot of developers should follow suit with. (*Hatter, Edward, Transcript, October 1, 2015*)

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My second comment is about open space in the plan. Most of the open space in the proposed project, in the original proposed project, consists of two large passageways, two long, narrow passageways. While these count as open space by legal standards, they will not be adequate for many of the purposes for which these open space. People are not going to be able to walk their dogs there. People are not going to be able to play ball there. For all of these, they're going to be going to Jackson Square Park. And so the impacts on open spaces will remain severe, and that needs to be adequately taken care of. (*Meroz, Yoram, Transcript, October 1, 2015*)

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And most and foremost, I think, via discussion about parks, recreation and open space which had quite of bit of review today as we are on the previous agenda item, should be properly reflected in the way the EIR responds to it. Those are data which were new to me, which in the detail that I saw them described today should find a way to be mirrored in what these questions are and which are perhaps not fully answered. (Commissioner Moore, San Francisco Planning Commission, Transcript, October 1, 2015)

### **Response RE-1**

These comments raise concerns about the project contribution to cumulative deficiencies of parks and public open space and the analysis of potential impacts in this regard. Comments also call for more public open space at the site. A further discussion of cumulative impacts in relation to the Eastern Neighborhoods Plan is included in Response ES-1.

Recreation was addressed in the CPE Checklist (page 49, included as Appendix A of the Draft EIR), which determined that the proposed project would be within the development projected in the Eastern Neighborhoods Rezoning and Area Plans. The proposed project would exceed Planning Code requirements for the provision of on-site public and private open space. While the proposed project would contribute to increased demands on open space and recreational facilities, this impact would be less than significant because the increase in use would not be so substantial as to cause or accelerate the physical deterioration of existing facilities or require the construction of new facilities to serve demand generated by the project.

While the project would not result in project-specific or cumulative recreational impacts, and therefore mitigation such as specific contributions to Jackson Playground or other area parks, would not be warranted per CEQA Guidelines section 15126.4, development impact fees are separately imposed by San Francisco, as discussed below.

The project would pay the Eastern Neighborhoods Infrastructure Fee to the Eastern Neighborhoods Community Improvements Fund to support acquisition and development of open space within the Eastern Neighborhoods, including the Showplace Square/Potrero Area. In the vicinity of the project site, two new publically-accessible parks are under construction nearby, the 0.9-acre Daggett Park across the street and the approximately two-acre Mariposa Park 0.2 miles away at Mariposa and Owens Streets. The former of these parks is located in an area identified in the Eastern Neighborhoods Plan Streets and Open Space Concept (Figure A3) as an area to acquire and develop sites for open space or neighborhood parks, and the latter was identified as planned open space in the Mission Bay South Redevelopment Plan.

Therefore, as discussed above, the analysis of recreational/open space impacts was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project. These comments are noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

### **Comment RE-2: Shadowing on Daggett Park**

Furthermore, access to sunlight at Daggett Park would be impacted with shadowing from the project, and public vistas will be compromised:...

- “That our parks and open space and their access to sunlight and visual vistas be protected from development.”

... The Showplace Square / Potrero Hill Area is already underserved in terms of open space and any additional shadowing will compromise the neighborhoods limited recreational opportunities.

Daggett Park is now a POPOS (Privately Owned Public Open Space). As such, it falls under Section 147 of the Planning Code: "New buildings and additions to existing buildings in C-3, South of Market Mixed Use, and Eastern Neighborhoods Mixed Use Districts where the building height exceeds 50 feet shall be shaped, consistent with the dictates of good design and without unduly restricting the development potential of the site in question, to reduce substantial shadow impacts on public plazas and other publicly accessible spaces other than those protected under Section 295. In determining the impact of shadows, the following factors shall be taken into account: The amount of area shadowed, the duration of the shadow, and the importance of sunlight to the type of open space being shadowed. Determinations under this Section with respect to C-3 Districts shall be made in accordance with the provisions of Section 309 of this Code. Determinations under this Section with respect to South of Market Mixed Use and Eastern Neighborhoods Mixed Use Districts shall be made in accordance with the provisions of Section 307 of this Code."

Because the proposed project is over 50 feet, and adds net shadow to a portion of Daggett Park, impacts and appropriate mitigations must be considered. The DEIR fails to properly examine the impacts of shadowing. The Community Plan Checklist mentions only the importance of open space that would be shadowed, but does not fully consider the impact of morning shadows, or the significant cumulative impacts of shadowing from the Daggett project in combination with the 901-16th/1200-17th Street project. (*Heath, Alison, E-mail, October 05, 2015*)

### **Response RE-2**

This comment raises concerns about project shadowing on Daggett Park. Shadows were addressed in the CPE Checklist (pages 42 through 48, included as Appendix A of the Draft EIR).

Based on the shadow analysis that was completed for the project (Figures 16 through 19 in the CPE Checklist included as Appendix A of the Draft EIR), the CPE Checklist acknowledges that net new shadow from the project would contribute to shadowing on Daggett Park during the mornings in mid-fall to mid-winter, when the park would already experience shadowing from the EQR Potrero buildings. The project would not contribute substantial shadowing during other times of the year or in the afternoons, when the park would otherwise receive the least shadowing. Therefore, it was concluded that shadowing from the project would not substantially affect use of the park and the impact would be less than significant.

Therefore, as discussed above, the analysis of Daggett Park shadow impacts was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project.

## K. UTILITIES AND SERVICE SYSTEMS

The comments and corresponding responses in this section cover topics in Section 10, Utilities and Service Systems of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment UT-1: Demand for Utilities/Water

### **Comment UT-1: Demand for Utilities/Water**

I am sure that this project would also put tremendous pressure the available utilities. (*Anasovich, Philip, E-mail, September 12, 2015*)

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One other impact that is totally missing from the report is "water" ... how can we justify building thousands of new toilets, showers, and bathtubs when all of us have been required to cut back significantly. As reported by the Chronicle, the snow pack in the Sierra Nevada mountain range, our primary source of water, is the lowest it has been in 500 years. Perhaps this is not a good time to be adding any new demands on such a scarce resource. (*Hutson, Richard, Letter, September 17, 2015*)

### **Response UT-1**

These comments raise concerns about availability of utilities for the project and specifically water. Utilities, including water, were addressed in the CPE Checklist (pages 49 and 50, included as Appendix A of the Draft EIR). Demand for utilities was found to be within that identified in the Eastern Neighborhoods Plan and therefore would not result in significant impacts. A discussion of the cumulative analysis and growth assumptions from the *Eastern Neighborhoods PEIR* was also included on pages IV.5 through IV.7 of the Draft EIR. Growth that has occurred within the Plan area since adoption of the has been planned for and the effects of that growth were anticipated and considered in the *Eastern Neighborhoods PEIR*. Although the reasonably foreseeable growth in the residential land use category is approaching the projections within the, the non-residential reasonably foreseeable growth is between approximately 33 and 70 percent of the non-residential projections in the *Eastern Neighborhoods PEIR*. The *Eastern Neighborhoods PEIR* utilized the growth projections for certain environmental impact topics (including Utilities/Public Services; and Water) to analyze the physical environmental impacts associated with that growth. The analysis took into account the overall growth in the Eastern Neighborhoods and did not necessarily analyze in isolation the impacts of growth in one land use category, although each land use category may have differing severities of effects. Therefore, the cumulative assumptions provided within the *Eastern Neighborhoods PEIR* are applicable to development of the project site and the CPE Checklist analysis makes a reasoned and good faith effort to inform decision-makers and the public about the impacts of the proposed project.

Water demand planning and analysis, including that performed for the Eastern Neighborhoods Plan, is performed in accordance with the requirements of the California Urban Water Management Planning Act (UWMPA).<sup>27</sup> UWMPA acknowledges cyclical droughts in California and requires demand planning to account for droughts, which includes planning for ongoing increases in water reduction and recycling and usage constrictions during extended droughts. While the condition related to whether a drought is

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<sup>27</sup> California Water Code Division 6, Part 2.6, Sections 10610 through 10656, 1986, as amended.

occurring or not could change depending on when a project is proposed, the fact that droughts of varying lengths occur in California is not new information and would not warrant new or additional analysis. Note also that the proposed project is not a "Water Demand Project" as defined by CEQA Guidelines Section 15155(a) and a water assessment is not required pursuant to Section 15155(b).

Therefore, as discussed above, the analysis of utilities impacts, including water demand and availability, was adequately covered in the CPE Checklist and no additional environmental review of this topic is required for the proposed project.

## L. GEOLOGY AND SOILS

The comments and corresponding responses in this section cover topics in Section 13, Geology and Soils of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment GE-1: Geological Hazards

### **Comment GE-1: Geological Hazards**

The property site is located on artificial bay in-fill. It sits within designated high tide and liquefaction zones that make it unsuitable and potentially dangerous for oversized development. Up to 17 feet of artificial fill overlying sandy and clay soils underlie the subject property. Groundwater below the site is encountered within a matter of several feet. A seismic fault (Hunters Point Shear Zone) also lies nearby -- a fact that was not addressed and evaluated in the DEIR, the Eastern Neighborhoods EIR, or in the initial geotechnical study required by the City. The DEIR should more specifically address liquefaction risks and mitigations given the absence of study acknowledging the Hunters Point Shear Zone. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

### **Response GE-1**

This comment raises concerns related to the geology and soils characteristics of the site. Geology and Soils were addressed in the CPE Checklist (pages 52 to 54, included as Appendix A to the Draft EIR) and referenced geotechnical investigations, which are available for review at the Planning Department as part of Case File No. 2011.1300E.

The characterization of soils at the site was completed for the required geotechnical investigations, which including soil sampling and testing. As noted in the comment and acknowledged in the geotechnical investigations, (a portion of) the site is located on bay fill, artificial fill is present at the site, the depth to groundwater is within about 8 feet below ground surface, and the site is located within a designated liquefaction hazard zone. These geotechnical characteristics are not uncommon in the Bay Area, which historically experienced substantial bay fill for development. The geotechnical investigations include site preparation and construction recommendations based on the specific of the geology and soils at the site, which would be incorporated into construction documents, and concluded that construction meeting or exceeding California Building Code safety standards would be feasible at the site for the proposed project and therefore the impact related to potential geological and soils hazards would be less than significant. Compliance with applicable codes and regulations is adequate to address the potential for hazards related to geological and soil conditions and has been determined to be feasible. No additional analysis, disclosure, or mitigation is warranted for these topics. Additionally, per recent case law, CEQA does not require an agency to consider the impact of environmental conditions on future project users, but rather limits the CEQA analysis to effects of the project on the environment.<sup>28</sup>

The commenter's contention that the site is in a high tide zone seems to be incorrect. As noted in the CPE (page 56), "The project site is not within a 100-year-flood special hazard area as shown on the Federal Emergency Management Agency (FEMA) 2007 maps for San Francisco and would not be subject to any

<sup>28</sup> California Building Industry Assn. v. Bay Area Air Quality Management Dist., (December 17, 2015) 218 Cal.App.4th 1171, Case No. S213478. ("CBIA v BAAQMD")

localized flooding. According to Maps 5, 6, and 7 of the San Francisco General Plan Community Safety Element, the project site is not in an area subject to landslide, seiche, or tsunami run-up.” To further clarify, the project site is not adjacent to the Bay nor in an area subjected to inundation by tidal action.

The commenter’s contention that a seismic fault is located nearby is incorrect. As noted in the geotechnical investigations, there are no known earthquake faults on the site or close enough to it that fault-related ground failure in the event of an earthquake would be anticipated at the site. A shear zone is an area that can experience lateral spreading during an earthquake, though the potential for lateral spreading depends on the geological characteristics at a specific location within a shear zone. (While lateral spreading can sometimes be described as “faulting,” depending on the type of spreading, this is distinct from the definition used for Alquist-Priolo earthquake mapping of earthquake fault hazards, as assessed under CEQA.) The Hunters Point Shear Zone is mapped in a large band across San Francisco from Fort Point to Hunters Point, which includes the project site.<sup>29</sup> Location within a shear zone does not trigger additional regulations, as site-specific analysis of potential for lateral spreading is performed as part of a required geotechnical investigation prior to construction. The Hunters Point Shear zone was not explicitly mentioned in the geotechnical investigations, but, based on the soil testing and characteristics of the site, the geotechnical investigations conclude that the site would not be subject to lateral spreading. Therefore, the potential impact related to lateral spreading from a shear zone was properly assessed for the proposed project and no additional analysis, disclosure, or mitigation is warranted for this topic.

As discussed above, the topic of geology and soils impacts was adequately covered in the CPE Checklist and no additional environmental review of this topic or mitigation is required for the proposed project.

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<sup>29</sup> Wakabayashi, J., Nappes, *tectonics of oblique plate convergence, and metamorphic evolution related to 140 million years of continuous subduction, Franciscan complex*, CA: Journal of Geology, v. 100, 1992, pp. 19-40.

## M. HAZARDS AND HAZARDOUS MATERIALS

The comments and corresponding responses in this section cover topics in Section 15, Hazards and Hazardous Materials of the CPE Checklist (Appendix A of the Draft EIR). These include topics related to:

- Comment HZ-1: Hazardous Materials during Construction
- Comment HZ-2: Gas Pipeline Hazards

### **Comment HZ-1: Hazardous Materials during Construction**

The problems with the DEIR include:...4) Inadequate Study and Mitigation of Soil Hazards (*Glicken, Sarah, E-mail, September 25, 2015*)

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DEIR needs to take notice of adjacent school and school children. ALT school should not just be a footnote in this document. Including treatment of toxic dust during construction and noise. (*Cpuc, Jci, E-mail, October 04, 2015*)

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HAZARDOUS MATERIALS NEED FURTHER DETAILED STUDY: The EIR should be revised to include more specific information about hazardous materials and measures to protect children and neighbors from exposure during demolition, remediation and construction. Based on the lack of detail in the Draft EIR, we are not confident that our children and neighbors will be safe. (*Angles, Sean, E-mail, October 05, 2015*)

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The toxicity of soil and groundwater in this area raises questions about safety during construction and an adequate level of remediation. Known hazards include petroleum hydrocarbons, heavy metals, asbestos and other materials. Because the project is within ¼ of a mile of several schools as well as a public park used by children, there are impacts peculiar to this project that were not considered in the ENP PEIR. Complete studies of the extent and nature of contamination as well as mitigations that eliminate the risk of accidental release of materials should be completed prior to the publication of the DEIR for this project.

Page 58 states that, "Implementation of the proposed project would not result in either project-level or cumulative significant impacts that were not identified in the *Eastern Neighborhoods PEIR* related to listed hazardous materials sites." Since the PEIR doesn't accurately project cumulative growth for the Showplace Square/Potrero Hill Area, this assumption is ungrounded. New analysis must be done to account for past, present and reasonably foreseeable future projects. (*Heath, Alison, E-mail, October 05, 2015*)

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The DEIR fails to adequately address the hazardous materials that will be exposed during construction. The Project Sponsor plans to excavate and truck nearly 14 million gallons of soil to an off-site landfill.



Furthermore, the DEIR does not acknowledge nor consider the fact that a kindergarten through 8th grade school (a sensitive site receptor) operated by the ALT School plans to open its doors in an adjacent building (99 Missouri Street) in the Fall of 2016. A change of use for the building was filed on or around 9/03/15.

An analysis and review of the property by a professional engineering geologist and hydro-geologist in late 2012 raised numerous red flags about soil geology, hazardous waste, and seismic risks at the site (please see review by John O'Rourke submitted by Save The Hill to City Planning via email December 2, 2012). More recent analysis identified elevated levels of chromium, nickel, lead, asbestos, and coal tar wastes in soil and groundwater.

The DEIR should be revised to include more specific information about hazardous soils and measures to protect children (who are more vulnerable) and neighbors from exposure during demolition, excavation, and remediation. To date the City and the DEIR have not treated this issue seriously enough. The DEIR should address and analyze the potential risks of a new children's school (AltSchool) locating next to the Corovan site and detail mitigation measures that go well beyond what is currently planned. The California Department of Toxic Substances should also be involved in monitoring and coordinating this effort to ensure the safety of both children and neighbors. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

#### **Response HZ-1**

These comments raise concerns about the adequacy of analysis of hazardous materials at the site and the potential for hazardous conditions for nearby sensitive uses during construction activities. Hazards and Hazardous Materials were addressed in the CPE Checklist (pages 57 through 60, included as Appendix A of the Draft EIR) and referenced analysis in Environmental Site Assessments (ESAs) prepared for the project, which are available for review at the City Planning Department as part of Case File No. 2011.1300E.

Through sampling and assessment of soils and groundwater at the site, the ESAs prepared for the project site identified and characterized hazardous materials at the site related to past industrial uses including soils that contain coal tar waste and lead as well as soils with naturally occurring asbestos, nickel and chromium. Some groundwater samples contained petroleum hydrocarbons and volatile and semi-volatile organic compounds.

As noted in the CPE Checklist page 58, the project site is subject to Article 22A of the Health Code, also known as the Maher Ordinance, which is administered and overseen by DPH. As part of this required Maher Ordinance process, DPH will review and must approve a Site Mitigation Plan, Soil Management Plan, Air Monitoring Plan, Dust Control Plan prior to construction activities. As part of the process, DPH notifies DTSC and the Regional Water Quality Control Board of proposed remedial actions prior to approval of these plans. Because the Maher Ordinance process is required for the project consistent with existing regulations, requires review and approval by qualified professionals, includes performance standards protecting the safety of nearby sensitive uses, and is considered feasible in the ESAs, compliance with these regulations meets requirements for mitigation of impacts per CEQA Guidelines section 15126.4, and can therefore be concluded to minimize impacts of the project on a project-specific or cumulative basis such that they would not be significant. While the *Eastern Neighborhoods PEIR* also concluded impacts related to construction-period hazardous materials would be less than significant, conclusions for the project were based on assessment of the specifics of hazardous materials at the project site and appropriateness and effectiveness of existing regulations to mitigate potential impacts, as detailed above.

In regard to potential construction-period hazardous materials impacts to the proposed Alt School, an application for a Preliminary Project Assessment for a change of use from retail and auto repair uses to Institutional - Educational (Alt School) at 1240 17<sup>th</sup> Street was submitted to the Planning Department on August 18, 2015, subsequent to publication of the CPE Checklist and Draft EIR. At the time of preparation of this RTC, the Alt School has put their application on hold (in March 2016) as they pursue alternate locations instead. Because the Alt School project was not officially proposed at the time of publication, it was considered speculative, and therefore included as a footnote only in those documents. School children are considered sensitive receptors for a number of environmental effects, including hazardous materials impacts; however, residential uses are also assumed to include children and infants, which are considered receptors of at least the same level of sensitivity. Residential uses and associated sensitive receptors have already been assumed to be located as close as the property line of the proposed project. Therefore, the analysis of construction-period hazardous materials impacts in the CPE Checklist and mitigation discussed above would also be adequate to characterize and mitigate potential construction-period hazardous materials impacts to the a proposed school and no additional analysis or mitigation would be warranted.

Therefore, the analysis of construction-period hazardous materials impacts was adequately covered in the CPE Checklist and no additional environmental review of this topic or mitigation is required for the proposed project.

#### **Comment HZ-2: Gas Pipeline Hazards**

Geological Hazards: Impacts on Gas transmission pipelines need further study. Please consult with PG&E. This proposes to site a very high density development next to a major line. Specific maps were provided in public scoping. Construction impacts are of special concern. (*Cpuc, Jci, E-mail, October 04, 2015*)

#### **Response HZ-2**

This comment requests consultation with PG&E regarding gas transmission pipelines. According to PG&E's Gas Transmission Pipeline System map, the project site is not directly adjacent to a gas transmission line. The closest natural gas transmission pipeline to the project site runs along Missouri Street, terminating near the southern side of 17<sup>th</sup> Street, approximately 150 feet from the project site. Other gas transmission pipelines are located more than 1,800 feet from the project site.<sup>30</sup> The distance between the project site and the closest gas transmission pipeline indicates that construction activities at the site would not have the potential to damage or otherwise impact the gas line. The normal building permit review process will confirm the absence of gas transmission pipelines adjacent to the project site.

There are no policies or regulations preventing location of housing near or even adjacent to gas transmission lines and the potential for an accident involving a specific nearby gas transmission pipeline would in any case be considered speculative. As noted in CEQA Guidelines section 15145, environmental analysis need not engage in evaluation that is too speculative.

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<sup>30</sup> PG&E, Gas Transmission Pipeline System Map, available at <http://www.pge.com/en/safety/systemworks/gas/transmissionpipelines/index.page>. (A printout of this map is what was referenced here.)

## N. AESTHETICS

The comments and corresponding responses in this section cover topics discussed in Section II, Project Description of the Draft EIR. These include topics related to:

- Comment AE-1: Project Architecture/ Design
- Comment AE-2: Views

### Comment AE-1: Project Architecture/ Design

For the Walden Development project as designed by The Prado Group its positive features are: the roof line on Mississippi Street along its Eastern edge contour; the preserved brick building on Mariposa Street; the center courtyard and resident stoops; landscaping therein; the walk through 16th street to Mariposa; the corner mural art work; the inviting use of glass for transparencies in the retail spaces.

...Areas that should be revisited are: ... the roof line on Mariposa which appears an overbearing, inorganic straight line where the upper floors of the building meet the sky; the north face of window bays along 16th Street are lacking in any distinctive design and are depressingly 'Soviet Block' in appearance.

... The building site is also a 'gateway' to Potrero Hill. The current design pays too little tribute to those aspects in my opinion. Failure to do so would constitute a missed opportunity and represent a march to the further gentrification of this cities architectural heritage. I would only ask: "what side of history do you wish to be part of in your recommendations to the powers that be"? (*Rudolfi, Peter, E-mail, September 15, 2015*)

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The massive scale of the proposed project will create another giant monolithic wall like the project that is under construction on the other side of 16th Street. Daggett Triangle. The lack of respect for the height, mass, articulation, and materials of existing buildings on Potrero Hill is very apparent. The proposed project looks like it belongs in "Anywhere USA", not in San Francisco. (*Hutson, Richard, Letter, September 17, 2015*)

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Here are the facts: ... Project is well designed and addresses the community's concerns (*Gilson, Frank, Letter, October 01, 2015*)

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One only needs to look at all of the building that has taken place in Mission Bay to see examples of what not to do. As I watch the various projects go up in San Francisco and not just in my neighborhood, I am struck by their sameness. Being a professional designer for most of my career, I feel that San Francisco will eventually suffer from all of this and become very similar in look and feel to many other sites in America. We can ill afford this. Much of it's standing as one of the loveliest cities in the world, visited by tourists from around the globe, is based on its unique architecture and not over development and cookie cutter building that is taking place now. (*Kurash, Ron and Lynka Adams, E-mail, October 02, 2015*)

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I won't mention my aesthetic objections to the two-building plan offered by Prado/Walden, although they are considerable. *(Delacorte, Peter, E-mail, October 03, 2015)*

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I fear quite soon I will find my town overtaken by the same blocky, uninspired, monstrosously large, out of character edifices that are diluting the modern world. *(Adams, Lynka, E-mail, October 04, 2015)*

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OVERSIZED MASS DISTORTS PROTECTED HISTORICAL BUILDING ELEMENTS. Second, the architecture and mass are ugly. It appears to be a mirror image of the horrible Daggett Place across the street. This proposed project will add to the another atrocity as the visual gateway access point to Potrero Hill. The past decisions by planning department are sterilizing our existing neighborhood character with formulated blandness. *(Dangles, Robert, E-mail, October 05, 2015)*

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I understand that CEQA does not require; any exterior visions, color, material or even a photosynthesis of the project. But I personally feel that this item helps sell a project to the community and should be included. As Architecture/design, color, material and etc is personal, but adds enormous value to any project. In this case the elevations and street views of this project does a good job with this issue. *(Hong, Dennis, E-mail, October 05, 2015)*

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Please consider reducing the number of residential units and a decrease in building height as an alternative to the proposed plan which will be a massive eye sore for the Potrero Hill community and a daily pain for Potrero Hill residents parking and driving near the Corovan site. *(Leerkamp, Chris, E-mail, October 05, 2015)*

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Further, an Environmental Review should not ignore that buildings make up our environment, that when their visual appearance is the result of low cost, revenue maximizing "design" that is so bad that it belongs only in a suburb you hate, let along a city you love, then the "architecture" is in fact polluting the local environment. A transit-first city encourages people to walk, cycle, skateboard, etc, and when the buildings people see as they do fail to deliver on the opportunity to beautify and uplift, as the currently proposed "Motel 6 on steroids" does, the city loses an opportunity to have added positively to the local environment. *(Wurtman, David, Letter, undated)*

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One of the things that we learned was that sustainability success on the ground or real life is part process and part product. And the Walden Development project has met the high standards of both elements, not only in the design product of the project, as you've heard -- let me raise my hand as another person who hates those 17th and Rhode Island, 17th and DeHaro monstrosities, not only the design of the project, but also in the design process. They brought us an interactive community opportunity to have input, and we

were able to vote on what we liked and not, so that we got to see that it wasn't just something that was going to be plopped down on us. (*Cornellio, Cathe, Transcript, October 1, 2015*)

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I can see by my neighbors here that there is a real frustration they are not able to express their opinion about what's going on with the design of this thing, and I share that with them. (*Dwyer, Richard, Transcript, October 1, 2015*)

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San Francisco has always been a vibrant and interesting city. To someone visiting or seeing the city in a movie or photo, they get their first impressions from the architecture. Why now are we homogenizing the city's beautiful landscape with suburban outlet mall architecture? Far older cities across the globe manage to grow and still keep the beauty of their architectural heritage. Why can't we do the same? Please do not sell us out as a city. Do not lower the bar for short money. San Francisco is far too special for that. (*Audra (no last name given), Transcript, October 1, 2015*)

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The Potrero Hill neighborhood, as many neighborhoods in the city, finds itself inundated with new architecture. Change for the city is inevitable, but the quality of some of these buildings goes from boring blandness to mediocrity. The architects involved in these projects are forced by the developers to create designs that they would really prefer not to do. The buildings are designed to maximize square footage with the maximum height limitation the only stopping point, Big, bulky buildings with sheer facades are the rule. To appease any local neighborhood groups, changes are very reluctantly made to soften the impact of these structures. (*Anasovich, Philip, Transcript, October 1, 2015*)

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I just want to -- I'm the last person, so I will say I'll give you a quote. You can put down the book. You can avoid listening to bad music. But you cannot miss the ugly, towering block opposite your house. Renzo Piano. (*Jani Musse, Transcript, October 1, 2015*)

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#### **Response AE-1**

These comments generally pertain to the architecture/design of the proposed project and not the accuracy or adequacy of information or environmental analysis in the Draft EIR. As noted in the Draft EIR (page S.2 and I.6), aesthetic issues are not considered a CEQA impact for infill projects of this type. Visual simulations have been included for informational purposes in Section II, Project Description. The concerns raised in these comments are noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

#### **Comment AE-2: Views**

Furthermore, access to sunlight at Daggett Park would be impacted with shadowing from the project, and public vistas will be compromised:...

- “That our parks and open space and their access to sunlight and visual vistas be protected from development.” (*Heath, Alison, E-mail, October 05, 2015*)

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I live in Potrero Hill at 1025 17th Street. I am concerned with the massive development planned for 901 16th St. My condo has 2 decks that face the corner of 17th and Mississippi. I live on the top floor of my building. The height of the planned building will completely block the city views and cast long shadows on our block. Because of current traffic congestion and the lack of parking (during business hours), as well as blocking city views for the current Potrero Hill residents, I feel the proposed development at 901 16th Street should be sized and scaled down. Please consider reducing the number of residential units and a decrease in building height as an alternative to the proposed plan which will be a massive eye sore for the Potrero Hill community and a daily pain for Potrero Hill residents parking and driving near the Corovan site. (*Leerkamp, Chris, E-mail, October 05, 2015*)

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The developer’s proposed project and penthouses will also contribute to obscuring a cherished landmark of Potrero Hill – scenic public views of downtown San Francisco. This conflicts with long-standing city and state policies regarding protection of public scenic vistas.

...While recent state law has put into question consideration of significant aesthetic impacts during environmental review, City agencies nonetheless retain this authority as a discretionary power. Issues of aesthetics should not be ignored or minimally reviewed. City agencies are still faced with an obligation to consider and address visual impacts to satisfy City General Plan and Showplace Square / Potrero Hill Area Plan neighborhood design and character standards. Since both the general public and decision-makers rely on an EIR for primary source information to make informed decisions about a project, the Planning Department should provide robust analysis of aesthetic impacts. At the very least, City Planning should provide accurate and adequate computer generated 3-D modeling visual simulations on the impacts of the project (including stair, elevator, mechanical penthouses) to public scenic views of downtown. The visual simulations offered in the DEIR remain inadequate and highly misleading.

...The significant impacts on aesthetics including public views have not been adequately or properly evaluated in the DEIR and should be included in a final EIR. (*Minott, Rod, Save the Hill, Letter, October 05, 2015*)

### **Response AE-2**

These comments generally pertain to views to and across the site and not the accuracy or adequacy of information or environmental analysis in the Draft EIR. As noted in the Draft EIR (page S.2 and I.6), aesthetic issues are not considered a CEQA impact for infill projects of this type. Visual simulations from various locations around the project site and discussion of changes to views have been included for informational purposes in Section II, Project Description. The concerns raised in these comments are noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

## O. GENERAL COMMENTS

The comments and corresponding responses in this section cover general subjects not directly related to a specific section of the Draft EIR. These include topics related to:

- Comment GC-1: Size/Density of the Proposed Project
- Comment GC-2: Merits of the Proposed Project
- Comment GC-3: Other Non-CEQA Issues
- Comment GC-4: Noticing at the Site
- Comment GC-5: Historic Preservation Commission Architectural Review Committee Review of the Project
- Comment GC-6: Referenced or Copied Comments from Save the Hill Group
- Comment GC-7: General Adequacy of the EIR
- Comment GC-8: Updated CEQA Guidelines

### **Comment GC-1: Size/Density of the Proposed Project**

My basic objection, which covers a host of more specific dissatisfactions, is that the proposed complex is simply way too massive for that site. Huge, bulky structures, hundreds of new residents and automobiles transforming our neighborhood. And, although this is probably the largest and most dense development project currently underway for Potrero Hill, it is just one of numerous projects that Potrero Hill residents are being forced to deal with. It really is too much. *(Boyd, David, E-mail, September 07, 2015)*

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I understand we need to build new housing. I am not against housing at that site. I am against super high density, large project -type housing at that site. *(Goldenberg, David, E-mail, September 11, 2015)*

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That the findings of the Draft EIR suggest that the development as proposed by Walden Development will lead to unavoidable impacts to transportation and circulation is no surprise to neighbors and locals on Potrero Hill. The project is a very dense and bulky building that is vastly over scaled for the site. *(Anasovich, Philip, E-mail, September 12, 2015)*

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The proposed project is inconsistent with the existing scale and density of the surrounding neighborhood.

... The massive scale of the proposed project will create another giant monolithic wall like the project that is under construction on the other side of 16th Street. Daggett Triangle. The lack of respect for the height,

mass, articulation, and materials of existing buildings on Potrero Hill is very apparent. (*Hutson, Richard, Letter, September 17, 2015*)

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The massive scale of the proposed project will create another giant monolithic wall like the project that is under construction on the other side of 16th Street. Daggett Triangle. The lack of respect for the height, mass, articulation, and materials of existing buildings on Potrero Hill is very apparent. The proposed project looks like it belongs in "Anywhere USA", not in San Francisco. (*Hutson, Richard, Letter, September 17, 2015*)

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Giving permission for another oversized, bloated....REALLY unattractive apartment complex on this corner, would be a travesty. (*Musse, Jani, Email and Videos, October 02, 2015*)

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Because of its mass, bulk, and height, the project is dramatically out of scale with nearby residences and businesses. (*Baron, Bonnie, E-mail, October 03, 2015*)

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My name is Peter Delacorte and I've lived on Potrero Hill since 1972. There have been gradual, tolerable changes on the Hill in those 43 years. But this new explosion of building, mandated by the Eastern Neighborhoods Plan and epitomized by the Prado/Walden project at the base of the hill, is horrendous. I realize that development is inevitable, but it must be as responsible as possible. (*Delacorte, Peter, E-mail, October 03, 2015*)

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Density impacts are not adequately and accurately analyzed. (*Loomis, John, E-mail, October 03, 2015*)

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This neighborhood presently cannot handle the crush that is coming. Scale it back. PLEASE! (*Adams, Lynka, E-mail, October 04, 2015*)

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In addition the proposed building is HUGE and bears no relationship to the rest of the neighborhood. (*Farey-Jones, Lucy, E-mail, October 04, 2015*)

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The creation of the badly needed housing is not sufficient in my mind to balance out the negative effects of the project as proposed. The scale, density, materials, and looming character of the development is completely adverse to the existing neighborhood. This is of great concern to many residents and property owners on Potrero Hill. (*Anasovich, Philip, E-mail, October 05, 2015*)



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First, this ginormous project is too big for this neighborhood which is already suffering a total onslaught of luxury apartment building and massive new hospitals... *(Dangles, Robert, E-mail, October 05, 2015)*

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According to the draft EIR, the new development will bring a much higher population density than expected.

... Currently our community is not prepared for that massive development proposed. Please help our community by reducing the size of that 901 16th development or providing REAL solutions in the EIR draft. *(Fermin, Gennie, E-mail, October 05, 2015)*

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This location and these unique historical structures are not a suitable location for so much housing. *(Gemignani, Michael, Paragon Frames, E-mail, October 05, 2015)*

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The proposed project would overwhelm the prevailing scale of development, merging four separate parcels into two covering an unprecedentedly large 3.5- acre complex over two blocks. This would result in the largest footprint of any development anywhere on Potrero Hill outside of Potrero Terrace. The large massing would be entirely out of context with the neighborhood's traditional diversity of ownership, use and appearance that comes with smaller parcels.

... As proposed, the project fails to match the height, mass, and articulation of older existing buildings in the vicinity and provides little awareness of surrounding structures or any sense of authenticity. *(Heath, Alison, E-mail, October 05, 2015)*

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I'd like to express my significant concerns about the Corovan Project. I've been a resident of Potrero Hill for almost 3 years and have been a resident of San Francisco for 6 years and am concerned with the rapid development happening in the neighborhood and that nothing seems to be addressing mine and neighbors concerns about the impact. *(Horton, Michelle, E-mail, October 05, 2015)*

...The development being proposed is way too dense for the character of Potrero Hill. There is not adequate open space and frankly I wouldn't want to live in these places. They take away from the character, neighborly feel and beauty of the neighborhood. I left Soma for a reason and it makes me sad that these huge buildings are happening in Potrero. Have you ever gone down Berry street? It's so dark much of the day from all these huge developments that don't have character or add to the neighborhood. It doesn't lend itself to building community which is something I appreciate about Potrero and the character of the neighborhood is that people know each, care about one another and the neighborhood itself. *(Horton, Michelle, E-mail, October 05, 2015)*

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Because of current traffic congestion and the lack of parking (during business hours), as well as blocking city views for the current Potrero Hill residents, I feel the proposed development at 901 16th Street should be sized and scaled down. Please consider reducing the number of residential units and a decrease in building height as an alternative to the proposed plan which will be a massive eye sore for the Potrero Hill community and a daily pain for Potrero Hill residents parking and driving near the Corovan site.

*(Leerkamp, Chris, E-mail, October 05, 2015)*

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I urge Commissioners to reject the developer's proposal, which is too large and dense for the area and is grossly insensitive to both existing congestion and an inescapable intensification of this congestion that will soon be unleashed with the completion of Daggett place and other nearby developments. *(Miller, Ruth, E-mail, October 05, 2015)*

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Furthermore, the project sponsor should be expected to invest in more traffic reducing strategies and should collaborate with both the community and City Planning on an alternate proposal to achieve this outcome. The project sponsor proposes a very ambitious, large-scale development for a very sensitive site, and it is reasonable that they shoulder more of the responsibility for traffic reducing measures in the surrounding area. A significant reduction in the density of the project is only one way they could positively mitigate traffic problems posed by their proposal.

... As noted above, the scale, height, and density of the proposed project (68 feet to 83 feet and 395 residential units) remain inconsistent with numerous terms set out in the Showplace / Potrero Hill Area Plan. *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

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The lack of respect for the height, mass, and materials of existing buildings on Potrero Hill is very apparent. The proposed project has an incredibly massive scale and will create another giant wall like the project that is directly across the street on 16th Street, Dagget Triangle. *(Nicholson, Jane, E-mail, October 05, 2015)*

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Before more harm is done with the approval of an oversized, hideous, light-blocking, local-merchant evicting, car-dense, local gridlock-generating, soulless project, based on absurdly outdated and inadequate traffic studies and in violation of the city's commitment to preserve historical buildings and character, I ask that SF not ignore the inadequacies of the current proposed project simply because "we need more housing units". *(Wurtman, David, Letter, undated)*

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And here is what the developers are proposing on the overhead. This is a before and after image. It gives you an idea of the project's impact and scale, this, despite alleged by the developers that they wouldn't give us another Mission Bay Site Development after we succeeded in getting their Kaiser medical project relocated to Mission Bay. *(Minott, Rod, Transcript, October 1, 2015)*

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16th Street will have a balance with the project on Daggett. I do agree that the Daggett project is amazingly large, but I think that this will be in correspondence and balance with that. (*Taskett, Jim, Transcript, October 1, 2015*)

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As concerns the Corovan site, specifically, the project is simply as you've heard, in our opinion, as it's currently proposed, is simply too massive for that particular site, and everything nearby. (*Boyd, David, Transcript, October 1, 2015*)

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The project as proposed -- I guess the developer's preferred option is way out scaled with the rest of the development in the neighborhood. (*No Name Given 1, Transcript, October 1, 2015*)

### **Response GC-1**

The preceding comments raise concerns regarding the size, scale, density, design, incompatibility and consequent traffic impacts of the proposed project. As a general matter, note that the Draft EIR's evaluation of the proposed project's consistency with both the General Plan and the Planning Code focuses on conflicts with objectives and policies that could result in physical environmental effects. The consistency of the proposed project's size, scale, and density with the General Plan and the Planning Code are discussed in Section III, Plans and Policies, of the Draft EIR. As discussed in that Section, the project site's Urban Mixed Use (UMU) zoning and 48-X and 68-X height and bulk districts allow for the proposed use, size and density. The zoning district and height and bulk district along 16<sup>th</sup> and 17<sup>th</sup> streets are different than the established residential blocks further south on Potrero Hill that are within Residential (R) zoning districts and the 40-X height and bulk district. Although the proposed project includes six waivers and exceptions, including exceptions to requirements related to horizontal massing and configuration of rear yard open space that may affect perceptions of size and bulk, they are allowed under the Planning Code with approval from the Planning Commission. As noted in the Draft EIR, the proposed project was reviewed by the Current Planning and Citywide Planning divisions of the San Francisco Planning Department and determined to be generally consistent with the General Plan (including the Showplace Square/Potrero Area Plan) and the uses, density, height and bulk, unit mix, open space, and parking requirements of the Planning Code. The Draft EIR appropriately concluded that the proposed project is consistent with the type and intensity of development anticipated in the *Eastern Neighborhoods PEIR* and it would not result in obvious policy conflicts or in environmental impacts related to the General Plan and Planning Code.

In regard to comments concerning the proposed project's design and its compatibility with the surrounding neighborhood, aesthetic issues are not considered a CEQA impact for infill projects in an urban area (see Draft EIR pages IV.1 and IV.2).

In regards to the relationship between proposed project's size and density and the traffic it would generate, a complete TIS was prepared and Section IV.A, Transportation and Circulation, of the Draft EIR presents the results of the proposed project's potential impacts upon traffic congestion and circulation, transit, loading, bicycling, pedestrians, emergency access, and construction. For a summary discussion of Section IV.A's conclusions regarding the proposed project's potential impacts to transportation and circulation,

please see Response TR-11. Note, however, that the Draft EIR acknowledges that the proposed project would result in significant and unavoidable impacts to traffic congestion at four intersections.

Therefore, as discussed above, there are no significant project impacts directly related to height and bulk and therefore no mitigation measures are warranted per CEQA Guidelines section 15126.4.

Recommendations for alternative site and building designs outlined in these comments are noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

**Comment GC-2: Merits of the Proposed Project**

I am writing this letter in protest of the developer's proposal for the Corovan site at 1200 17<sup>th</sup> St + 901 16<sup>th</sup> St. This is crazy, unbridled urban development that looks like unrestrained greed. (*Gavre, Yvonne, Letter, September 05, 2015*)

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I wish to express, once again, my opposition to the proposed project plan for the Corovan site (16-17th & Mississippi Sts.) in Potrero Hill. (*Boyd, David, E-mail, September 07, 2015*)

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I am writing to voice my opposition and point out issues I see with the project at 901 16th (Corovan site). I live just up the street from the project.

I am watching the monstrous project go up on 16th street.

I understand from people knowledgeable in development that the next project often points to one and says 'we are no bigger than they are' etc.

I then travel to other neighborhoods in the city which I love and which I think make SF a special place – Dolores Park, Nob Hill etc.

I see a much more balanced approach to development in these neighborhoods and certainly very few megacommunity type developments.

I understand this one project will not change city policies (transit first etc.) but every time I look at the 16th street project being built I wonder whether there is nothing better we can do with the Corovan site than to build another soul-less large structure which will turn SF into Orange County or anywhere USA. That is what I feel the planning department feels is ok for our neighborhood.

Potrero is a special place – it is about to be ruined.

You can take a stand and say that the large developments are to be kept in SOMA (north of the channel) and Mission Bay (east of the freeway) or you can turn all of Potrero into Mission Bay and ruin it forever. The planned development at the Corovan site will ruin Potrero. (*Goldenberg, David, E-mail, September 11, 2015*)

Can one of you please confirm that Potrero Partners, LLC is the owner of the 901 16th Street and 1200 17th Street property? Thank you for your help. (*Laurain, Janet, Adams Broadwell Joseph & Cardozo, E-mail, September 11, 2015*)

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I roundly oppose the project, but understand there is more need for housing in the city. Given that, there must be sensitivity. I urge you and your colleagues not to give into a developers dream: Rather, think carefully about planning and pay special attention to the voices of Potrero Hill. We know what we're talking about. (*Iaconi, Mara, E-mail, September 13, 2015*)

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In my opinion, this project can't get started fast enough. It will replace a derelict corrugated structure on a big block and replace it with a really well designed building with residential and commercial amenities serving the local community and the UCSF campus.

Please consider approving as designed and presented. (*Eslick, Susan, Letter, September 14, 2015*)

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I was happy to hear that the Walden plan for 17th Street, Case No. 2011.1300E, intends to restore and revitalize the brick building and replace the ugly corrugated buildings on 17th Street. We in Northwest Potrero would like to see 17th Street as the biking -walking street and 16th Street as the traffic and BRT street. Restoring the brick building and making the 17th Street side pedestrian friendly fits in with our vision of 17th Street and harmonizes with our plan to create an urban park, Potrero Gateway Park to the west of this development. (*Bogiages, Jean, E-mail, September 17, 2015*)

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I believe that the project as currently proposed for the Corovan site should be rejected.

...The project also fails to offer any meaningful new amenities for the neighborhood ... for example a drug store.

...Please reject this project ... or at least send it back to the drawing board with a mandate for reduced scale and density that is more consistent with the existing built environment of Potrero Hill. (*Hutson, Richard, Letter, September 17, 2015*)

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I urge you and the city to consider rejecting the Corovan Site project as it currently stands. (*Glicken, Sarah, E-mail, September 25, 2015*)

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It is because of these reasons that I urge you to endorse this project. Thank you for your time. (*Gilson, Frank, Letter, October 01, 2015*)

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As a long time home owner and resident of Potrero Hill, I am writing to register my dismay at what I see as an overly aggressive development plan for a neighborhood that cannot handle it.

... I read that planners have said that things dealing with traffic, public transportation, and parking are on the list of things to change, but in my experience, it is mostly talk to get a project green lighted for construction. (*Kurash, Ron and Lynka Adams, E-mail, October 02, 2015*)

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One pro-Prado/Walden speaker at the Commission hearing October 1st, said (essentially) Yes, the Hill is getting too congested and we should think twice about these big developments, but let's go ahead and build this one because the landowner is a responsible person. Would that it were so! (*Delacorte, Peter, E-mail, October 03, 2015*)

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Creative adaptive reuse of existing structures should always take preference over Walmart scaled structures for the finely grained urban context of Potrero Hill.

Why has it come to this?

I am afraid if a finger must be pointed it must be pointed at the San Francisco Planning Department. I have had friends and colleagues in the department for years, and I sympathize with the enormous challenges they face on a daily basis. But I fear that recently there has been a serious breach of faith with the public. The San Francisco Planning Department has racked up a shameful trail of broken promises: (*Loomis, John, E-mail, October 03, 2015*)

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I was born in San Francisco, raised my children here and live on Potrero Hill. I moved from Willard st in the upper Haight 20 years. At that time parking on Willard street was to put it mildly a nightmare. Cars circling on three shifts at UCSF to park, traffic that at the time seemed outrageous, the beginning of letter parking "J" right after the original "A". I am asking the city to reconsider the enormous projects that are going up all over the city but in particular the cordovan site for this communique.

To put a spin on it to use a bike metaphor everyone does not ride one and the transportation sucks. Oh yes you put a bus on 16th street to accommodate UCSF but we folks on the hill who have suffered from bad service for the twenty years I have lived at 1900 20th street sit back and wince at what is to come. Please someone listen to the people who live here. We are not in pacific heights where I know this would not be tolerated without a fight like we have fought for at least two years. You are on a tolerant side of town.....please listen to people. (*Meakin, Rita, E-mail, October 03, 2015*)

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I have lived on Potrero Hill since 2002 in a single family home between 18th and 19th streets on Texas where I moved with my husband and our then teenaged daughter. Having lived in San Francisco through the first tech boom, this current one is not a stranger. Our city must grow to accommodate new citizens and I am okay with this. I understand that multiple unit apartment buildings are the only means to make this happen and I am also okay with this. (*Adams, Lynka, E-mail, October 04, 2015*)

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As a resident of Mississippi Street I am writing to object to the scope of the proposed Corovan Project. The rate of development on the hill has been fast and furious with many 'luxury' condominium projects going up in the past decade. ...SF needs to stop letting developers ruin the character of our city. (*Farey-Jones, Lucy, E-mail, October 04, 2015*)

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I'm an eight-year resident of Potrero Hill and I'm writing to share some thoughts on the draft environmental impact report for the development project planned for 901 16th Street and 1200 17th Street. I'm worried that building the currently proposed project at this site will not only have various long-term negative impacts on its immediate area that will be difficult to mitigate, but also be a missed opportunity of major proportions.

I have attended the public hearing on this project held on October 1st as well and provided some of my opinions in person. I'd like to use this written opinion to elaborate a little more on one or two of the issues that concern me the most and to provide return feedback in response to some of the comments made by the commissioners at the end of the public hearing session. (*Guney, Ergin, E-mail, October 04, 2015*)

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On this matter of community support, I am concerned that the developers have misled city representatives in suggesting that they have a good deal of support for their proposal. Part of this concern is based on what I have witnessed in the past few years including the shenanigans of putting neighborhood "representatives" on the developer's payroll or persuading people (some of whom don't even live in or have an ongoing connection to the neighborhood) to make public statements of support. I know also of artist friends who have been promised commissions by the developer (for among other things photo-documenting the destruction of the metal structures) as a way of giving the appearance that artists support his proposal. (*Roberts, Kent, E-mail, October 04, 2015*)

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I am OPPOSED to the current proposal for housing at 901 16th Street and 1200 17th Street.

... In conclusion, I strongly urge the Planning Department to reject this draft Environmental Impact Report and to not approve this proposal for housing. (*Angles, Sean, E-mail, October 05, 2015*)

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I'm opposed to the proposed massive housing project at the Corovan site at 901 16th Street and 1200 17th Street.

... In conclusion, I OPPOSE this current proposal for housing. (*Dangles, Robert, E-mail, October 05, 2015*)

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I am the owner of the property that is immediately adjacent to the proposed project at 901-16th St. and 1200-17th St.

The EIR draft report is accurate and adequate and I am very familiar with the project and very supportive of Walden Development, the project sponsor.

They have reached out to me several times and we have developed a positive and cooperative relationship. I feel that the proposed project by Walden Development will complement my building and will enhance the neighborhood. *(Gordon, Roberta, E-mail, October 05, 2015)*

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... In Conclusion: Based on my comments and evaluation of the DEIR I have concluded there is sufficient information and I fully support this Project and the DEIR. *(Hong, Dennis, E-mail, October 05, 2015)*

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Thank you in advance for considering my comments, my support of the project, and my concurrence with the findings of the Planning Department. *(Kiernat, Carolyn, Page & Turnbull, Letter, October 05, 2015)*

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I believe that the project as currently proposed for the Corovan site should be rejected.

Please reject this project, or at a minimum send it back to the drawing board with a mandate for reduced scale and density that is more consistent with the existing built environment of Potrero Hill.

... The project also fails to bring any new services or amenities to the neighborhood.

... I must repeat what I said in the beginning- Please reject this project... or return it for a mandate for a reduction of scale and density. *(Nicholson, Jane, E-mail, October 05, 2015)*

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I regret to say that we are dealing with tone-deaf Project Sponsors in Walden/Prado (Potrero Partners). They have simply refused to listen to and respect the wishes of the Potrero Hill community. A majority voice has repeatedly expressed opposition to what these developers are currently proposing. Save The Hill shared its alternative adaptive reuse plan with the developers earlier this year and offered to meet with them -- an offer they quickly rebuffed. Their so-called community outreach has been, frankly, a sham, designed to ignore and minimize neighbor input and to market a vastly oversized project. Despite a personal pledge that they wouldn't build a Mission Bay-type development after Save The Hill succeeded in getting their Kaiser Medical project relocated to Mission Bay ... Walden/Prado are once again attempting to steamroll the community with another Mission Bay-type development. *(Minott, Rod, Save the Hill, Letter, October 05, 2015)*

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While I am not an expert on new construction, the subject project appears to be high-quality and tries to respect the area's industrial past and the building's connection to the community. *(Orton, Eddie, Orton Development, Inc., Letter, October 05, 2015)*

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The proposed “Corovan Project” has elicited such impassioned response and reaction from so many because it embodies the growing perception of a top- down approach to San Francisco’s growth that either actively favors, or passively allows, developers’ interests to trump those of the community. People opposing this project don’t oppose all change, all growth, or the inevitability of increased density. We do oppose new development that is insensitive – and even oblivious – to the surrounding landscape, architectural vernacular, and history of the community. (*Smails, Arcadia, Letter, October 05, 2015*)

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I’m just here today to say that I respect the developer, Josh, who’s been in the neighborhood. He’s been attending meetings and been part of the Eastern Neighborhoods Planning for years. He’s not been, like, flying in and flying out, like some developers. I think he wants to make a project that will be good for the neighborhood, and so I’m here, really just to vouch for his intent, and I hope that you’ll make the best decision possible for the neighborhood. (*Carpinelli, Janet, Transcript, October 1, 2015*)

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My experience of family and neighborhood history brings me today to speak in support of this project. I think that the Walden Development has brought to the neighborhood both in spoken presentations 16 and interactive community involvement opportunities. They sought to vote, record, evaluate and then include all of the feelings and input that those of us here on Potrero Hill had about their project. (*Cornellio, Cathe, Transcript, October 1, 2015*)

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I’d like to sum this project up with one word, responsive. I looked at this project at the beginning of the onset and many years that it’s been in planning, and I’ve worked with the developers, and I’ve actually put forth my views. I’m not an architect or a scholar on corrugated metal, but I am a person who works with people. And the developer in this development seems to have taken into consideration the people of the neighborhood. And I look at that as a very important part of this EIR, an important part of this development, because many of the developments that have gone on in the past and are to come in the future are not taking the people into consideration.

... I am looking forward to this project actually being completed so it can actually set a precedent for the rest of the block. (*Hatter, Edward, Transcript, October 1, 2015*)

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I believe that Josh shares an appreciation for this neighborhood and has taken steps with designs in this plan to enhance and improve the area. This project will enhance the neighborhood, as I mentioned. I believe that this project will be greatly helping in solving the housing drought, and I support the approval of this project. Currently, the area has frequently seen multiple vehicle break-ins -- I’ve been a participate in that recently -- as well as a dumping of household and commercial materials. In addition, there’s regular graffiti and tagging. This is, I think, a direct cause of the lack of humans in the area in the evening. It is a very dark, desolate area. I believe that this is a condition that is actually spreading up the hill and affects our other property on Mississippi Street. These conditions lead to a degradation in the area that I believe a new construction and population will help to alleviate.

...I do support this project and that’s what I’m here to state. (*Taskett, Jim, Transcript, October 1, 2015*)

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I support the project. I urge you to approve the EIR, but I think that we need to look a lot deeper into what we've got ourselves into with this rezoning of the eastern neighborhoods. *(Woods, Corrine, Transcript, October 1, 2015)*

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I have reviewed the project. I read the EIR, and I support the project. Thank you. *(Zeidman, Lester, Transcript, October 1, 2015)*

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A couple of things. It's interesting, because -- I don't want to come across saying this the wrong way. It's interesting because I grew up kind of in the area. I actually had the same developer doing a project out there. I had a different experience. Each neighborhood obviously has some differences. We have PDR space. We have lost gas stations like we have in the Mission, the new PDR space. But there are some parallels as well in it. I know there are some real issues here. And we saw the Eastern Neighborhood review a little while ago and it is quite sobering. One of the questions, one of the thoughts I have that is rolling around in my mind, is the Eastern Neighborhoods. Supervisor, I believe three of them, maybe four, we hear from a couple of supervisors in the other districts in the other southern areas. I would love to hear from the supervisor in this district around what the larger issues are, what that supervisor sees here moving forward with things that we talked about today. So I intend to at least call on that supervisor and chat with that person. *(Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015)*

### **Response GC-2**

These comments generally pertain to the merits of the project and not the accuracy or adequacy of information or analysis in the Draft EIR. Some comments express support for or opposition to the proposed project and others request that the project be modified to reduce the overall density and scale of the project. The concerns raised in these comments are noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process. Where specific comment was made regarding the environmental analysis, these comments have been repeated and addressed under the appropriate environmental topics above.

### **Comment GC-3: Other Non-CEQA Issues**

I am watching the monstrous project go up on 16th street.

I understand from people knowledgeable in development that the next project often points to one and says 'we are no bigger than they are' etc.

I then travel to other neighborhoods in the city which I love and which I think make SF a special place – dolores park, nob hill etc.

I see a much more balanced approach to development in these neighborhoods and certainly very few megacommunity type developments.

I understand this one project will not change city policies (transit first etc.) but every time I look at the 16th street project being built I wonder whether there is nothing better we can do with the corovan site than to build another soul-less large structure which will turn SF into Orange County or anywhere USA. That is what I feel the planning department feels is ok for our neighborhood.

Potrero is a special place – it is about to be ruined.

You can take a stand and say that the large developments are to be kept in soma (north of the channel) and mission bay (east of the freeway) or you can turn all of potrero into mission bay and ruin it forever. The planned development at the corovan site will ruin potrero. *(Goldenberg, David, E-mail, September 11, 2015)*

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Can one of you please confirm that Potrero Partners, LLC is the owner of the 901 16th Street and 1200 17th Street property? Thank you for your help. *(Laurain, Janet, Adams Broadwell Joseph & Cardozo, E-mail, September 11, 2015)*

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The project also fails to offer any meaningful new amenities for the neighborhood ... for example a drug store. *(Hutson, Richard, Letter, September 17, 2015)*

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One pro-Prado/Walden speaker at the Commission hearing October 1st, said (essentially) Yes, the Hill is getting too congested and we should think twice about these big developments, but let's go ahead and build this one because the landowner is a responsible person. Would that it were so! *(Delacorte, Peter, E-mail, October 03, 2015)*

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Creative adaptive reuse of existing structures should always take preference over Walmart scaled structures for the finely grained urban context of Potrero Hill.

Why has it come to this?

I am afraid if a finger must be pointed it must be pointed at the San Francisco Planning Department. I have had friends and colleagues in the department for years, and I sympathize with the enormous challenges they face on a daily basis. But I fear that recently there has been a serious breach of faith with the public. The San Francisco Planning Department has racked up a shameful trail of broken promises: *(Loomis, John, E-mail, October 03, 2015)*

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... We are not in pacific heights where I know this would not be tolerated without a fight like we have fought for at least two years. You are on a tolerant side of town.....please listen to people. *(Meakin, Rita, E-mail, October 03, 2015)*

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To put a spin on it to use a bike metaphor everyone does not ride one and the transportation sucks. Oh yes you put a bus on 16th street to accommodate UCSF but we folks on the hill who have suffered from bad service for the twenty years I have lived at 1900 20th street sit back and wince at what is to come. Please someone listen to the people who live here. *(Meakin, Rita, E-mail, October 03, 2015)*

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I have lived on Potrero Hill since 2002 in a single family home between 18th and 19th streets on Texas where I moved with my husband and our then teenaged daughter. Having lived in San Francisco through the first tech boom, this current one is not a stranger. Our city must grow to accommodate new citizens and I am okay with this. I understand that multiple unit apartment buildings are the only means to make this happen and I am also okay with this. *(Adams, Lynka, E-mail, October 04, 2015)*

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SF needs to stop letting developers ruin the character of our city. *(Farey-Jones, Lucy, E-mail, October 04, 2015)*

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I have attended the public hearing on this project held on October 1st as well and provided some of my opinions in person. I'd like to use this written opinion to elaborate a little more on one or two of the issues that concern me the most and to provide return feedback in response to some of the comments made by the commissioners at the end of the public hearing session. *(Guney, Ergin, E-mail, October 04, 2015)*

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On this matter of community support, I am concerned that the developers have misled city representatives in suggesting that they have a good deal of support for their proposal. Part of this concern is based on what I have witnessed in the past few years including the shenanigans of putting neighborhood "representatives" on the developer's payroll or persuading people (some of whom don't even live in or have an ongoing connection to the neighborhood) to make public statements of support. I know also of artist friends who have been promised commissions by the developer (for among other things photo-documenting the destruction of the metal structures) as a way of giving the appearance that artists support his proposal. *(Roberts, Kent, E-mail, October 04, 2015)*

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The plans for the Corovan site (395 units of housing + more than 24,000 square feet of retail) are in line with the current state of activity along 16th Street near 7th Street with 1000 Potrero at Daggett Triangle. This has set the pace and direction for future development in the area - including a public green space onsite to the project. More green and open space are always good.

Walden Development is and has been a consistent participant in many community projects over the past 8-10 years in the neighborhood with the Dogpatch Playground, Progress Park and the Gears. I do not see that changing. *(Huie, Bruce, Dogpatch Now, E-mail, October 05, 2015)*

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The project also fails to bring any new services or amenities to the neighborhood. (*Nicholson, Jane, E-mail, October 05, 2015*)

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The proposed “Corovan Project” has elicited such impassioned response and reaction from so many because it embodies the growing perception of a top- down approach to San Francisco’s growth that either actively favors, or passively allows, developers’ interests to trump those of the community. People opposing this project don’t oppose all change, all growth, or the inevitability of increased density. We do oppose new development that is insensitive – and even oblivious – to the surrounding landscape, architectural vernacular, and history of the community. (*Smails, Arcadia, Letter, October 05, 2015*)

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A couple of things. It's interesting, because -- I don't want to come across saying this the wrong way. It's interesting because I grew up kind of in the area. I actually had the same developer doing a project out there. I had a different experience. Each neighborhood obviously has some differences. We have PDR space. We have lost gas stations like we have in the Mission, the new PDR space. But there are some parallels as well in it. I know there are some real issues here. And we saw the Eastern Neighborhood review a little while ago and it is quite sobering. One of the questions, one of the thoughts I have that is rolling around in my mind, is the Eastern Neighborhoods. Supervisor, I believe three of them, maybe four, we hear from a couple of supervisors in the other districts in the other southern areas. I would love to hear from the supervisor in this district around what the larger issues are, what that supervisor sees here moving forward with things that we talked about today. So I intend to at least call on that supervisor and chat with that person. (*Commissioner Richards, San Francisco Planning Commission, Transcript, October 1, 2015*)

### **Response GC-3**

These comments address general concerns related to development and project approvals, but do not specifically relate to or identify particular deficiencies in the Draft EIR. Specific comments that relate to the adequacy of the information and analysis in the Draft EIR are addressed in the responses under each topical subsection above. The concerns raised in these comments are noted, will be transmitted to City decision-makers, and will be considered by City decision-makers as part of the project approval process.

### **Comment GC-4: Noticing at the Site**

These notices (see attachment) around the Corovan site are much smaller than what's required. Improper notification. (*Minott, Rod, E-mail, September 15, 2015*)

### **Response GC-4**

This comment states that posted notification at the site did not meet requirements. Staff visited the project site on Friday, September 18, 2015 to verify that public notices for the 901 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street DEIR Hearing were still posted consistent with Planning Department “Instructions for Site Posting for Draft Environmental Impact Reports and Preliminary Mitigated Negative Declarations.” Staff observed two large format notices (24”x36”) posted, one on 16<sup>th</sup> Street and another on Mississippi Street. Four legal size (11”x17”) notices were also posted: one on 16<sup>th</sup> Street, one on Mississippi Street and two on 17<sup>th</sup> Street. All notices were legible and located consistent with the Planning Department Site Posting Instructions. As required, the project sponsor also submitted a Declaration of Posting with photographs at the end of the

public comment period. The Declaration of Posting and photographs are available for public review as part of case file 2011.1300E.

**Comment GC-5: Historic Preservation Commission Architectural Review Committee Review of the Project**

The HPC [Historic Preservation Commission] requests that the proposed project be reviewed by the Architectural Review Committee prior to the EIR certification hearing. (*Wolfram, Andrew, Historic Planning Commission, Letter, September 21, 2015*)

**Response GC-5**

This comment requests that the project be reviewed by the Architectural Review Committee (ARC) of the Historic Preservation Commission (HPC). In response to this request, the project was presented to the ARC on November 4, 2015. Upon their review, the ARC provided a letter with the following comments:<sup>31</sup>

Upon review of the additional materials provided, the ARC determined that:

1. The proposed project does not cause an impact to the existing historic resource on the site (the brick office building). The proposed project respectfully incorporates the historic building alongside adjacent new construction and does not overwhelm the historic resource by providing adequate setbacks and open space around the brick office building.
2. The proposed project meets Secretary of the Interior's Rehabilitation Standard No. 9 in regards to materials, scale and massing of the proposed adjacent new construction.

See also Response CP-2 for discussion of the ARC hearing and letter.

**Comment GC-6: Referenced or Copied Comments from Save the Hill Group (Minott, 10/5/15)**

I also heartily agree with all the very thoughtful and detailed comments which I am sure have been presented to you by others.

These can be found here: [http://www.savethehill.com/DEIR/DEIR\\_Flaws\\_Corovan.html](http://www.savethehill.com/DEIR/DEIR_Flaws_Corovan.html)

These comments echo the density and traffic issues I mention. (*Goldenberg, David, E-mail, September 11, 2015*)

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I am writing to you to express my full support for the Save the Hill position on the draft EIR for the Corovan site at 901 16th / 1200 17th & Mississippi Streets. You can find a detailed summary and critique at <[www.savethehill.com/DEIR/DEIR\\_Flaws\\_Corovan.html](http://www.savethehill.com/DEIR/DEIR_Flaws_Corovan.html)>. I urge you to follow their recommendations. (*Mize, Scott, E-mail, October 03, 2015*)

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<sup>31</sup> Andrew Wolfram, Architectural Review Committee of the Historic Preservation Commission, letter to Environmental Review Officer, November 5, 2015. This document and all subsequent documents referenced are available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2011.1300E.

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I am a supporter of Grow Potrero Responsibly and Save the Hill, and I agree with the positions that Save the Hill has articulated in their summary and critique, of which I am sure you are aware. (*Firpo, Janine, E-mail, October 04, 2015*)

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[Some comment sets included text repeated from the Save the Hill letter (*Minott, Rod, Save the Hill, Letter, October 05, 2015*) with no changes or only minimal editorial changes. To avoid unnecessary redundancy, such repeated text has been omitted here but identified with the topic GC-10 to note reference/concurrence to those comments. This occurred in the following letters:]

(*Wilkins, Jim, E-mail, September 24, 2015*)

(*Angles, Sean, E-mail, October 05, 2015*)

(*Dangles, Robert, E-mail, October 05, 2015*)

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I'm Rod Minott, co-founder of Save The Hill, a grass roots group, Potrero Hill neighbors, that formed over three years ago over concerns about development at this sensitive site. We're proud to have several hundred fellow neighbors supporting us in this cause. We believe the Draft EIR remains inadequate for a number of reasons, including issues of historic integrity, loss of PDR space and impacts due to mass size, scale and height. In the last few weeks, we've shared with you a memo that addresses many of these concerns. I'll save discussion of these for written comments to the city planners. (*Minott, Rod, Transcript, October 1, 2015*)

#### **Response GC-6**

Some commenters either referenced comments made by the Save the Hill group or copied their comments verbatim. See Table RTC-1 for topics in the Save the Hill comments and appropriate topics for responses, which include the following:

PO-1, PO-2, ES-1, TR-2, TR-3, TR-6, TR-7, TR-10, TR-11, TR-12, TR-24, CP-1, CP-2, AL-1, AL-2, AL-3, AL-4, LU-1, NO-1, AQ-1, AQ-2, RE-1, GE-1, HZ-1, AE-2, GC-1, GC-2, GC-6

#### **Comment GC-7: General Adequacy of the EIR**

Their draft EIR appears to be both adequate and accurate. (*Eslick, Susan, Letter, September 14, 2015*)

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The EIR appears to have covered all the required topics well. (*Bogiages, Jean, E-mail, September 17, 2015*)

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Here are the facts:... Draft EIR is accurate and adequate (*Gilson, Frank, Letter, October 01, 2015*)

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The EIR draft report is accurate and adequate and I am very familiar with the project and very supportive of Walden Development, the project sponsor. (*Gordon, Roberta, E-mail, October 05, 2015*)

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... In Conclusion: Based on my comments and evaluation of the DEIR I have concluded there is sufficient information and I fully support this Project and the DEIR. (*Hong, Dennis, E-mail, October 05, 2015*)

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I think the Draft EIR is well done. It presents alternatives and also presents alternatives that were rejected in addition to the saving of the shed alternative. There was a reduced-size alternative and, of course, the alternative that always is presented on the projects. So that's what we expect to see, and it's well done. (*Commissioner Antonini, San Francisco Planning Commission, Transcript, October 1, 2015*)

### **Response GC-7**

These comments generally address the adequacy of the Draft EIR. Where specific inadequacies were identified in comments, these comments are addressed under the relevant topic area above. As detailed under specific topics, the Draft EIR meets standards for adequacy of an EIR per Section 15151 of the CEQA Guidelines.

### **Comment GC-8: Updated CEQA Guidelines**

Level of Service Analysis page IV 2

This entire analysis must be reframed and bolstered or the document must be recirculated after OPR adopts the new CEQA guidelines which have a comment period which closes AFTER the Oct 5 extended comment period for the draft EIR. The document presents a speculative perspective on establishing significance re section 21099.

I would argue LOS in a transit route, private bus route, truck route, bike lane with an at grade rail transit crossing may continue to require consideration in LOS. In addition there is support of PDR. It is already an area determined to have poor air quality so additional congestion would exacerbate that unless exclusively ZEV (zero emitting vehicles). (*Cpuc, Jci, E-mail, October 04, 2015*)

### **Response GC-8**

The comment states that the transportation and circulation analysis must be revised according to revised CEQA Guidelines once they are adopted by the Office of Planning and Research (OPR).

OPR released a preliminary discussion draft of the new CEQA Guidelines (discussion draft) to implement Section 21099 in August 2014.<sup>21</sup> Another draft, a *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* ("proposed transportation impact analysis guidelines"), was published for public review and comment in January 2016 through February 2016.<sup>22</sup> After receiving feedback during that public comment period, OPR will submit suggested changes of the CEQA Guidelines to the Secretary of the Natural Resources Agency for the formal rulemaking and adoption process. Once



the Secretary of the Natural Resources Agency adopts the CEQA Guidelines changes, they will be sent to the Office of Administrative Law for approval. When the Office of Administrative Law adopts the CEQA Guidelines changes, which is anticipated sometime in late 2016 or early 2017, the provisions will become effective immediately for lead agencies who elect to be governed by these provisions. According to the proposed transportation impact analysis guidelines, after two years from the adoption date, the provisions of the section shall apply statewide.

As discussed in Chapter II of this document, consistent with local implementation of provisions of California Legislative Information, Senate Bill No. 743, Chapter 386 (SB 743) through Planning Commission Resolution 19579, San Francisco has adopted VMT criteria in place of automobile delay criteria and VMT/induced automobile travel impact analysis is provided in Section IV.A, Transportation and Circulation. However, because the public comment period for the Draft EIR ended before the Planning Commission's adoption of Resolution 19579, the analysis of automobile delay will be retained in Draft EIR Section IV.A, Transportation and Circulation, even though, pursuant to Planning Commission Resolution 19579, automobile delay as described by LOS is no longer considered a significant impact on the environment pursuant to CEQA.

The VMT analysis determined that, based on average daily VMT that is substantially below regional averages, the impact related to VMT would be less than significant.

## V. Draft EIR Revisions

The following changes to the proposed project Draft EIR have been made in response to comments received on the Draft EIR, as noted in Section III, Comments and Responses, or to correct minor typos.

Portions of the Draft EIR that have been revised are shown as indented text. New or revised text is double-underlined; deleted material is shown in ~~striketrough~~.

The revisions to the Draft EIR derive from two sources: 1) comments raised in one or more of the comments letters received by the City and County of San Francisco on the Draft EIR; and 2) staff-initiated changes that correct minor inaccuracies, typographical errors or to clarify material found in the Draft EIR subsequent to its publication and circulation. Staff-initiated change to clarify information presented in the Draft EIR are highlighted by an asterisk (\*) in the margin to distinguish them from text changes associated with response to comments. None of the changes or clarifications presented in this chapter significantly alters the conclusions or findings of the Draft EIR.

Note that additional revisions to address text changes as a result of local implementation of Senate Bill (SB) 743 through Planning Commission Resolution 19579 are included in Chapter II of this document.

### SUMMARY

Pages S.3 to S.4 of the Draft EIR have been revised as follows (second to last paragraph under Summary of Impacts and Mitigation Measures):

The proposed project would also contribute to a significant and unavoidable impact identified in the *Eastern Neighborhoods PEIR*, as discussed in the CPE for this project (page 26). The *Eastern Neighborhoods PEIR* determined that adoption of the Eastern Neighborhoods Area Plans would result in an unavoidable significant impact on land use due to the cumulative loss of PDR (Production, Distribution, and Repair). While land use controls in Western SoMa were identified as possible mitigation, this was determined not to be feasible and would not be applicable to the proposed project in any case, as the proposed project is not located in that area. A Statement of Overriding Considerations was adopted by the City accepting this significant impact because retention of the PDR uses would conflict with planned growth of the area. The proposed loss of 109,500 square feet of existing PDR uses represents a considerable contribution to the loss of the PDR space analyzed in the *Eastern Neighborhoods PEIR*, but would not result in new significant impacts that were not previously identified or a more severe impact than analyzed in the PEIR.

- \* Page S.5 of the Draft EIR has been revised as follows to correct the mitigation numbering, consistent with other references in the document (last Mitigation/Improvement Measure title listed on this page):

#### **Mitigation Measure M-TR-~~32~~c: Implement a Transportation Demand Management Plan.**

Page S.22 of the Draft EIR has been revised as follows (third bullet point under Summary of Project Alternatives):

- The Metal Shed Reuse Alternative, under which all the warehouse buildings on the site (1210 17<sup>th</sup> Street/975 16<sup>th</sup> Street and 1200 17<sup>th</sup> Street) would be retained and reused. Along with a new building with underground parking in the northeast corner of the site, this alternative would

host a mix of residential units, commercial space, and artist workspace and exhibition space including 177 residential units, 20,200 square feet of commercial space, 55,323 square feet of artist workspace and exhibition space, 36,291 square feet of open space, 123 off-street parking spaces within a below-grade garage, and associated improvements. The total building area would be 369,907 gsf and building heights would be up to 5 stories (58 feet) along 16<sup>th</sup> street and 4 stories (48 feet) along 17<sup>th</sup> Street. (Certain rooftop elements, such as mechanical equipment, open space features, and stair penthouses, would extend up to 10 feet above the maximum building height, and elevator shafts would extend up to 16 feet above the maximum building height, as permitted by Planning Code Section 260 (b).) Although no significant and unavoidable historic architectural impacts are identified related to the demolition of the existing warehouses, this alternative was analyzed in response to the public comments that requested analysis of a smaller-scale alternative that retains the existing warehouses and reduces its contribution to the significant and unavoidable loss of PDR identified in the *Eastern Neighborhoods PEIR*.

Page S.24 of the Draft EIR has been revised as follows (second column of the Cumulative Loss of PDR Uses entry in Table S-4):

The proposed project would contribute to a significant and unavoidable impact identified in the *Eastern Neighborhoods PEIR* due to the cumulative loss of PDR (Production, Distribution, and Repair), as discussed in the CPE for this project (page 26). A Statement of Overriding Considerations was adopted by the City accepting this significant impact because retention of the PDR uses would conflict with planned growth of the area. The proposed loss of 109,500 square feet of existing PDR uses represents a considerable contribution to the loss of the PDR space analyzed in the *Eastern Neighborhoods PEIR*, but would not result in new significant impacts that were not previously identified or more severe impacts than were analyzed in the PEIR. (SU)

- \* Pages S.25 and S.26 (Table S-4) of the Draft EIR has been revised as follows to remove an incorrect Impact TR-2 and renumber subsequent TR impacts such that TR-3 becomes TR-2, etc., consistent with full text in Section IV.A:

Description of Topic	Environmental Impacts	No Project Alternative	Reduced Density Alternative	Metal Shed Reuse Alternative
<b>Transportation and Circulation</b>				
Vehicle Traffic at Intersections	<del>Impact TR 2: The proposed project, combined with present traffic volumes, would contribute considerably to significant traffic impacts at one of the 14 study intersections: Mariposa Street and the I-280 southbound on-ramp, but changes already underway and expected to be in place prior to the proposed project becoming operational would fully mitigate this impact. (LTS with changes being implemented by others)</del>	Not applicable	Less than the proposed project (LTS with changes being implemented by others)	Less than the proposed project (LTS with changes being implemented by others)

## II. PROJECT DESCRIPTION

- \* Page II.37 of the Draft EIR has been revised as follows (second bullet under *Actions by the Planning Commission or Department*):
- Large Project Authorization with exceptions to rear yard configuration (both buildings), off-street loading (both buildings), horizontal mass reduction (16th Street Building), off-street parking in excess of 0.75 space per unit (both buildings), parking/loading entrance width (16th Street Building), and projecting bay dimension (16th Street Building), provision of space-efficient parking for all residential parking in excess of 0.5 spaces per unit, and projecting bay dimension (16th Street Building). The Large Project Authorization is identified as the Approval Action for the whole of the proposed project.

## III. PLANS AND POLICIES

Page III.5 of the Draft EIR has been revised as follows (beginning of last paragraph under Showplace Square/Potrero Area Plan):

The proposed loss of 109,500 square feet of existing PDR uses represents a considerable contribution to the loss of the PDR space analyzed in the *Eastern Neighborhoods PEIR*, but would not result in new significant impacts that were not previously identified, or more severe impacts than were analyzed, in the PEIR.

- \* Page III.9 of the Draft EIR has been revised as follows (at the end of the third paragraph under Vehicle and Bicycle Parking):

Per Section 151.1 of the Planning Code, there is no minimum parking requirement in this district for any use. Maximum parking allowances are as follows: 0.75 parking space per dwelling unit, except that units with two or more bedrooms and totaling over 1,000 gross square feet may be provided up to one parking space per unit with approval by the Planning Commission of a Large Project Authorization exception. The project proposes a residential parking ratio of 0.85 space per unit. For projects between 50 and 200 units, one car share parking is required; for projects over 200 units, two car share spaces, plus one for every 200 dwelling units over 200 are required. Retail parking is allowed one car for every 500 sf floor area up to 20,000 sf per lot. Additionally, when more than 10 non-residential spaces are proposed, car share spaces are required at 5% of the total and do not count toward maximum allowances. The minimum required vehicle parking for the proposed project is zero spaces and the maximum allowed is 385, plus car share spaces. The project proposes 383 spaces (45 of which are non-residential) plus five car share spaces, two spaces short of the maximum allowable vehicle parking spaces. Also, Per Section 151.1(g)(1)(B) of the Planning Code, for projects that propose 50 dwelling units or more, all residential accessory parking in excess of 0.5 spaces per unit shall be stored and accessed by mechanical stackers or lifts, valet, or other space-efficient means that reduces space used for parking and maneuvering, and maximizes other uses.

## IV. ENVIRONMENTAL SETTING AND IMPACTS

- \* Pages IV.5 and IV.6 of the Draft EIR has been revised as follows to reflect an updated estimate of growth within the Eastern Neighborhoods Plan area (beginning of last paragraph on page IV.5):

The *Eastern Neighborhoods PEIR* found that implementation of the Eastern Neighborhoods Plan could result in a substantial amount of growth within the Eastern Neighborhoods Plan area, resulting in an increase of approximately 7,400 to 9,900 dwelling units and 3,200,000 to 6,600,000 square feet of non-residential uses (excluding PDR loss) throughout the lifetime of the Plan (year 2025).<sup>23</sup> The Eastern Neighborhoods PEIR projected that this level of development would result in a total population increase of approximately 23,900 to 33,000 people throughout the lifetime of the plan.<sup>24</sup> The growth projected in the *Eastern Neighborhoods PEIR* was based on a soft site analysis (i.e., assumptions regarding the potential for a site to be developed through the year 2025) and not based upon the created capacity of the rezoning options (i.e., the total potential for development that would be created indefinitely).<sup>25</sup> As of ~~July 2015~~February 23, 2016, projects containing ~~8,559,749~~ dwelling units and ~~2,231,595~~2,807,952 square feet of non-residential space (excluding PDR loss) have completed or are planned to complete environmental review<sup>26</sup> within the Eastern Neighborhoods Plan area. This level of development corresponds to an overall population increase of approximately 23,760 to 25,330 persons. These estimates include projects that have completed environmental review (~~4,885,647~~ dwelling units and ~~1,472,688~~1,788,733 square feet of non-residential space) and planned projects, including the proposed project (~~3,674,102~~ dwelling units and ~~758,907~~1,019,219 square feet of non-residential space). Planned projects are those projects that have submitted environmental evaluation applications with the San Francisco Planning Department. Of the 9,749 dwelling units that are under review or have completed environmental review, building permits have been issued<sup>27</sup> for 4,583 dwelling units, or approximately 47 percent of those units (information is not available regarding building permit non-residential square footage).

Within the Showplace Square/Potrero Hill subarea, the *Eastern Neighborhoods PEIR* estimated that implementation of the Eastern Neighborhoods Plan could result in an increase of approximately 2,300 to 3,900 dwelling units and 1,500,000 to 1,700,000 square feet of non-residential space (excluding PDR loss) through the year 2025. This level of development corresponds to an overall population increase of approximately 7,860 to 9,890 persons. As of ~~July 2015~~February 23, 2016, projects containing approximately ~~3,266,315~~ dwelling units and ~~865,849~~1,138,920 square feet of non-residential space (excluding PDR loss) have completed or are planned to complete environmental review within the Showplace Square/Potrero Hill subarea. This level of development corresponds to an overall population increase of approximately 6,910 to 7,760 persons. These estimates include projects that have completed environmental review (~~1,822,379~~ dwelling units and ~~621,768~~635,553 square feet of non-residential space) and planned projects, including the proposed project (~~1,444,936~~ additional dwelling units and ~~244,081~~503,367 square feet of non-residential space).<sup>28</sup> Of the 3,315 dwelling units that are under review or have completed environmental review, building permits have been issued for 1,836 dwelling units, or approximately 55 percent of those units. Therefore, anticipated growth from the Eastern Neighborhoods Rezoning and Area Plans is within the Eastern Neighborhoods PEIR growth projections.

Footnotes:

<sup>23</sup> Tables 12 through 16 of the Eastern Neighborhoods Draft EIR and Table C&R-2 in the Comments and Responses show projected net growth based on proposed rezoning scenarios. A baseline for existing conditions in the year 2000 was included to provide context for the scenario figures for parcels affected by the rezoning, not projected growth totals from a baseline of the year 2000. Estimates of projected growth were based on parcels that were to be

rezoned and did not include parcels that were recently developed (i.e., parcels with projects completed between 2000 and March 2006) or have proposed projects in the pipeline (i.e., projects under construction, projects approved or entitled by the Planning Department, or projects under review by the Planning Department or Department of Building Inspection). Development pipeline figures for each Plan Area were presented separately in Tables 5, 7, 9, and 11 in the Draft EIR. Environmental impact assessments for these pipeline projects were considered separately from the Eastern Neighborhoods rezoning effort.

<sup>24</sup> Table 2 Forecast Growth by Rezoning Option Chapter IV of the Eastern Neighborhoods Draft EIR shows projected net growth based on proposed rezoning scenarios. A baseline for existing conditions in the year 2000 was included to provide context for the scenario figures for parcels affected by the rezoning.

<sup>25</sup> San Francisco Planning Department, Community Planning in the Eastern Neighborhoods, Rezoning Options Workbook, Draft, February 2003. This document is available at: <http://www.sf-planning.org/index.aspx?page=1678#background>.

<sup>26</sup> For this section, environmental review is defined as projects that have or are relying on the growth projections and analysis in the *Eastern Neighborhoods PEIR* for environmental review (i.e., Community Plan Exemptions or Focused Mitigated Negative Declarations and Focused Environmental Impact Reports with an attached Community Plan Exemption Checklist).

<sup>27</sup> An issued building permit refers to buildings currently under construction or open for occupancy. This number includes all units approved under CEQA (including CPEs, Categorical Exemptions and other types of CEQA documents).

<sup>28</sup> The estimated number of dwelling units reported here is different than the estimated number of dwelling units identified in the San Francisco Planning Department's Pipeline Report, 3rd Quarter 2014 for Showplace Square/Potrero Hill subarea. Reasons for the difference include inadvertent overestimates from the Pipeline Report in the amount of development at particular development sites (e.g., 1000 16th Street and 1 Henry Adams and 801 Brannan Street) and the inclusion of Potrero Hope SF Project. The Potrero Hope SF Project includes 1,094 net new dwelling units; however, this Project is the subject of a stand-alone EIR that does not rely on the growth projections and impacts identified in the Eastern Neighborhoods PEIR. This Project would establish a Special Use District, would be built in phases over at least a 10-year period, and contains substantial infrastructure over and above the infrastructure improvements considered in the *Eastern Neighborhoods PEIR*.

#### IV.A. TRANSPORTATION AND CIRCULATION

Page IV.A.35 of the Draft EIR has been revised as follows to clarify the cumulative automobile delay analysis approach:

The 2025 Cumulative Conditions traffic volumes have been developed from the existing condition volumes used in the TIS and forecasted growth rates calculated from the and cumulative intersection turning movement volumes for the Eastern Neighborhoods PEIR and compared for consistency with the University of California San Francisco 2014 Long Range Development Plan Environmental Impact Report.<sup>32</sup> For intersections not included in the *Eastern Neighborhoods PEIR*, the annual percent growth rate for intersection turning movement volumes between the existing

and Cumulative Conditions analysis years have been determined. This annual percent growth rate has been applied to the observed 2013 turning movement volumes to determine the 2025 Cumulative Conditions turning movement volumes. Pedestrian, bicycle, and construction impacts are also discussed. Due to cumulative growth in the area, demand for on-street parking and loading conditions would likely increase. However, demand for parking and loading at the project site would be largely site specific and provision of off-street parking or loading space would remain similar to Existing Plus Project conditions. As any changes to on-street conditions would not be directly related to the proposed project under Cumulative Conditions, these topics are not discussed in the cumulative discussion.

Footnote:

<sup>32</sup> UCSF 2014 Long Range Development Plan Environmental Impact Report, State Clearinghouse Number 2013092047. Certified by the UC Board of Regents on November 20, 2014, available at <https://www.ucsf.edu/cgr/cgr-projects/lrdp>.

- \* Page IV.A.37 of the Draft EIR has been revised as follows to update the anticipated opening of the Owens Street extension:

With the implementation of the Owens Street extension, slated to open ~~December 2015~~<sup>34</sup> in the second half of 2016, it is expected that some traffic exiting northbound I-280 at Mariposa Street would continue northbound along Owens Street instead of using Mississippi Street to head north.

## V. OTHER CEQA ISSUES

Page V.2 of the Draft EIR has been revised as follows (beginning of last paragraph under Significant and Unavoidable Environmental Impacts):

The *Eastern Neighborhoods PEIR* determined that adoption of the Eastern Neighborhoods Area Plans would result in an unavoidable significant impact on land use due to the cumulative loss of PDR (Production, Distribution, and Repair). The proposed loss of 109,500 square feet of existing PDR uses represents a considerable contribution to the loss of the PDR space analyzed in the *Eastern Neighborhoods PEIR*, but would not result in new significant impacts that were not previously identified or a more severe impact than analyzed in the PEIR.

## VI. ALTERNATIVES

Page VI.27 of the Draft EIR has been revised as follows (the paragraph under the “Objectives” sub-header) in response to comments to clarify that the alternative is considered to be potentially feasible:

The Metal Shed Reuse Alternative would achieve some of the project sponsor’s objectives for the project. Because this alternative would allow for redevelopment of the site with a mix of residential and commercial uses including open spaces, but at a density that is substantially less than the proposed project, objectives regarding the development of a mix of uses on an underutilized site, and contribution to the City’s regional housing needs, would be achieved to a lesser extent than the proposed project. The Metal Shed Reuse Alternative would also comply with the UMU District zoning and the existing height and bulk requirements for the site and preserve the historic brick office building. While the City considers this alternative to be potentially feasible, ~~the~~ the project sponsors contend that this alternative ~~w~~ould fail to meet the objective to

develop a financially feasible project. Because the intensity of proposed uses would be substantially less than that of the project, some of the project sponsor's objectives would be achieved, though to a substantially lesser extent than the proposed project.

Page VI.34 of the Draft EIR has been revised as follows (first column under Land Use in Table VI-8):

The proposed project would contribute to a significant and unavoidable impact identified in the *Eastern Neighborhoods PEIR* due to the cumulative loss of PDR (Production, Distribution, and Repair), as discussed in the CPE for this project (page 26). A Statement of Overriding Considerations was adopted by the City accepting this significant impact because retention of the PDR uses would conflict with planned growth of the area. The proposed loss of 109,500 square feet of existing PDR uses represents a considerable contribution to the loss of the PDR space analyzed in the *Eastern Neighborhoods PEIR*, but would not result in new significant impacts that were not previously identified or a more severe impact than analyzed in the PEIR. (SU)

- \* Pages VI.34 and VI.35 (Table VI-8) of the Draft EIR has been revised as follows to remove an incorrect Impact TR-2 and renumber subsequent TR impacts such that TR-3 becomes TR-2, etc., consistent with full text in Section IV.A:

Description of Topic	Environmental Impacts	No Project Alternative	Reduced Density Alternative	Metal Shed Reuse Alternative
<b>Transportation and Circulation</b>				
Vehicle Traffic at Intersections	Impact TR 2: The proposed project, combined with present traffic volumes, would contribute considerably to significant traffic impacts at one of the 14 study intersections: Mariposa Street and the I-280 southbound on-ramp, but changes already underway and expected to be in place prior to the proposed project becoming operational would fully mitigate this impact. (LTS with changes being implemented by others)	Not applicable	Less than the proposed project (LTS with changes being implemented by others)	Less than the proposed project (LTS with changes being implemented by others)