



SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: July 19, 2018
TO: Members of the Planning Commission and Interested Parties
FROM: Joy Navarrete, Principal Environmental Planner
Re: **Attached Chapter 4 of the Responses to Comments on Draft Environmental Impact Report (EIR) Case No. 2015-011274ENV: 150 Eureka Street**

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Attached for your review please find a copy of revised Chapter 4. "Draft EIR Revisions (7-19-18)" to the Responses to Comments document for the Draft EIR for the above-referenced project. **This document replaces Chapter 4 in the Final Responses to Comments on DEIR. This document, along with the Response to Comments on DEIR (June 28, 2018) and Draft EIR (December 6, 2017), will be before the Planning Commission for Final EIR certification on July 26, 2018.** The Planning Commission will receive public testimony on the Final EIR certification at the July 26, 2018 hearing. Please note that the public review period for the Draft EIR ended on January 23, 2018; 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 Joy Navarrete at 415-575-9040.

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

4. DRAFT EIR REVISIONS (7-19-18)

This section presents specific revisions to the text of the draft EIR that are being made in responses to comments, or to amplify and clarify material in the draft EIR. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double underline text. Deletions to the text are shown with ~~striketrough text~~. Page numbers correspond to the page numbers of the draft EIR. 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 nor would they require recirculation of an EIR prior to certification pursuant to CEQA Guidelines Section 15088.5.

SUMMARY

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following change would be made to page S-1 of the draft EIR.

The proposed project would demolish the existing building on the site, split the existing lot into two lots, and construct two, four-story buildings with a total of four residential units and ~~eight~~four parking spaces within a total building area of approximately 14,441 gross square feet (gsf).

The following city-initiated changes are made to the draft EIR starting on page S-26 to address the comments received from the Planning Commission at the Final EIR hearing on July 12, 2018 in regards to the identification of two alternatives to add additional housing units to the site. These

changes do not alter the analysis or conclusions of the draft EIR. The following changes would be made to text on page S-25 and Table S-3 started on page S-26 (and Table VI-1 which is a duplicate of Table S-1) of the draft EIR.

- The **Partial Preservation 18 Studio Units Alternative**, under which the existing building envelope would be maintained at the ground level with interior modifications as well as vertical and horizontal additions. The building interior would be adapted to accommodate 18 studio units, for a total building area of 12,010 gsf and a total building height of 40 feet. There would be no off-street vehicular parking provided, and 18 bicycle parking spaces would be provided on the site. The rear yard would be 1,445 gsf. Implementation and construction of this alternative would require a rezoning of the site from RH-2 to a higher density designation. A Planning Code Text Amendment and a Zoning Map Amendment would also be required.
- The **Full Demolition 21 Studio Units Alternative**, under which the existing building would be fully demolished and a building containing 21 studio units would be constructed in its place. The building area would be a total of 14,149 gsf with a building height of 40 feet. There would be no off-street vehicular parking provided, and 21 bicycle parking spaces would be provided on the site. The rear yard would be 1,445 gsf. Implementation and construction of this alternative would require a rezoning of the site from RH-2 to a higher density designation. A Planning Code Text Amendment and a Zoning Map Amendment would also be required.

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives


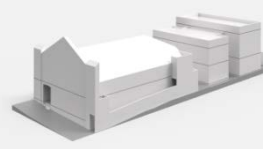


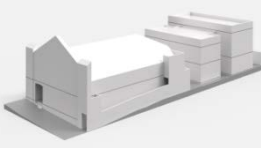

	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative	Partial Preservation 18 Studio Units Alternative	Full Demolition 21 Studio Units Alternative
		Assumes No Changes to the Site			Massing Similar to the Partial Preservation Alternative	Massing Similar to the Proposed Project
Description						
Building height (feet/inches)	40 ft	29 ft, 6-3/8 inches	29 ft, 6-3/8 inches	40 ft	<u>40 ft</u>	<u>40 ft</u>
Number of stories	4	2	4	4	<u>4</u>	<u>4</u>
Total number of residential units	4	0	4	4	<u>18</u>	<u>21</u>
2 bedroom	0	0	4	0	<u>0</u>	<u>0</u>
3 bedroom	2	0	0	4	<u>0</u>	<u>0</u>
4 bedroom	2	0	0	0	<u>0</u>	<u>0</u>
Studio	0	0	0	0	<u>18</u>	<u>21</u>
Gross square foot (gsf) by use						
Residential units	10,119	0	6,923	11,035	<u>7,925</u>	<u>10,064</u>
Open space private decks	1,081	0	673	1,237	<u>0</u>	<u>0</u>
Garage	2,332 1,170	0	0	870	<u>0</u>	<u>0</u>
Common area	909	0	742	3,548	<u>4,085</u>	<u>4,085</u>
Total Building Area	14,441	9,350	8,338	16,690	<u>12,010</u>	<u>14,149</u>
Rear yard at grade (gsf)	2,232	0	691	1,114	<u>1,445</u>	<u>1,445</u>
Open space (gsf) (125 sf private; 166 sf if common)	3,313 private 0 common	0	673 private 587 common	1,237 private 720 common	<u>1,445 common</u>	<u>1,445 common</u>
Off-street vehicle parking spaces	<u>84</u>	0	0	4	<u>0</u>	<u>0</u>
Bicycle parking spaces (class 1)	4	0	4	4	<u>18</u>	<u>21</u>
Lot number/size	6,250 sf lot would be split into two 3,125 sf lots, approximately	N/A	6,250 sf lot to be developed as one lot as currently exists	6,250 sf lot to be developed as one lot as currently exists	<u>6,250 sf lot to be developed as one lot as currently exists</u>	<u>6,250 sf lot to be developed as one lot as currently exists</u>
Planning entitlements	Building Permit Application In RH-2 Zoning District, with proposed lot split, each lot permitted two dwelling units	N/A	Conditional Use Authorization In RH-2 Zoning District with no lot split (one dwelling unit per 1,500sf lot area) Variance: For change of use in required rear yard	Conditional Use Authorization In RH-2 Zoning District with no lot split (one dwelling unit per 1,500 sf lot area) Variance: For minor encroachment into required rear yard	Rezoning Planning Code Text Amendment Zoning Map Amendment	Rezoning Planning Code Text Amendment Zoning Map Amendment

Table S-3: Comparison of Characteristics and Significant Impacts of the Proposed Project with EIR Alternatives

	Proposed Project	No Project Alternative	Full Preservation Alternative	Partial Preservation Alternative	Partial Preservation 18 Studio Units Alternative	Full Demolition 21 Studio Units Alternative
		Assumes No Changes to the Site			<u>Massing Similar to the Partial Preservation Alternative</u>	<u>Massing Similar to the Proposed Project</u>
Ability to Meet Project Sponsor's Objectives						
	The project meets all five of the project sponsor objectives.	The No Project Alternative meets none of the five project sponsor objectives.	The Full Preservation Alternative would fully meet Objective #3 and partially meet Objectives #1 and #2 of the proposed project. Objectives #4 and #5 would not be met.	The Partial Preservation Alternative would fully meet Objective #3 and partially meet Objectives #1 and #2 of the proposed project. Objectives #4 and #5 would not be met.	<u>The Partial Preservation 18 Studio Units Alternative would fully meet Objective #3 and would not meet Objectives #1, #2, #4, and #5.</u>	<u>The Full Demolition 21 Studio Units Alternative would fully meet Objective #3 and would not meet Objectives #1, #2, #4, and #5.</u>
Historic Architectural Resources						
Historic Architectural Resources	<u>Impact CR-1:</u> The demolition of the Metropolitan Community Church Building located at 150 Eureka Street would result in a substantial adverse change to the significance of an individual historical architectural resource as defined by CEQA Guidelines section 15064.5(b). (SUM)	N/A	Reduced Impact (LTS)	Reduced Impact but same outcome as the proposed project (SUM)	<u>Reduced Impact but same outcome as the proposed project (SUM)</u>	<u>Same Impact as the proposed project (SUM)</u>
Cumulative – Historic Architectural Resources	<u>Impact C-CR-1:</u> The proposed project, in combination with other past, present and reasonably foreseeable future projects in the project vicinity, would not result in a cumulatively considerable contribution to a significant cumulative impact on a historical architectural resource. (LTS)	N/A	Reduced Impact (LTS)	Reduced Impact (LTS)	<u>Reduced Impact (LTS)</u>	<u>Reduced Impact (LTS)</u>

SF = square feet

NI = no impact; LTS = less than significant; S = significant; SU = significant unavoidable; SUM = significant and unavoidable impact with mitigation; N/A = not applicable

Source: 150 Eureka Street, LLC, 2017; LSA, 2018.

PROJECT DESCRIPTION

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following change would be made to page 13 of the draft EIR.

The project would result in the demolition of the existing vacant two-story, wood-frame church building located at the site and construction of two four-story buildings each with a total of two residential units. The two buildings would total approximately 14,441 gross square feet (gsf) in size, and each would include a ~~four~~two-car garage and indoor common areas.

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following change would be made to page 18 of the draft EIR.

The project sponsor proposes to demolish the existing building on the site, split the existing lot into two lots, and construct two, four-story buildings with a total of four residential units and ~~eight~~four ground floor parking spaces within a total building area of approximately 14,441 gsf.

Subsequent to the publication of the draft EIR, the following reports were submitted, and are added as footnotes starting on page 18, as follows.

³ Patrick Buscovich & Associates Structural Engineers, *Re: 150 Eureka, Job Number 06.182*, November 31, 2017. 2006 Letter with Subject: Job Number: 06.182. July 31. 2007 Letter with Subject: Closure of 150 Street Church Facility. February 6.

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following changes would be made to page 20 of the draft EIR.

Access to the site would be provided via Eureka Street. Resident access to each unit would be provided by a common entryway in each building and from within the ground-level garages. A total of ~~eight~~four parking spaces (~~four~~two full sized and ~~four~~two compact) would be provided on site. The 142-146 Eureka Street building would provide approximately ~~1,182~~591 gsf of indoor common garage area and the 148-150 Eureka Street building would provide

approximately ~~1,158~~579 gsf of common indoor garage area. Each garage would include ~~two~~ tandem spaces, for ~~four~~two vehicles each. In addition, each parking garage would provide two class 1 bicycle parking spaces. New curb cuts for each proposed garage access driveway would be 10 feet in width. Two of the three existing on-street parking spaces on the Eureka Street frontage would be removed to accommodate the new garage entrances, subject to approval by the San Francisco Municipal Transportation Agency (SFMTA).

PLANS AND POLICIES

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following changes would be made to page 38 of the draft EIR.

According to Planning Code section 151, two off-street parking spaces are permitted per dwelling unit. As the proposed project would include four dwelling units, the project would be allowed to provide eight off-street parking spaces. Thus, the proposed ~~eight~~four off-street parking spaces (~~four~~two per building) would comply with planning code section 151. Planning code section 155.2 requires new residential buildings to provide one secured (class 1) bicycle parking space per each dwelling unit. The proposed project would provide two class 1 bicycle parking spaces in each garage (for a total of four spaces, one for each dwelling unit). Given the above, the proposed project would not conflict with the parking requirements outlined in the planning code.

CULTURAL RESOURCES

In response to comments on the draft EIR, the following changes are made to Section IV.A Historic Architectural Resources of the draft EIR starting on page 86.

Mitigation Measure M-CR-1b: Interpretation ~~five~~ Program.

- The project sponsor shall install a permanent plaque or other permanent commemorative element that identifies the site of Metropolitan Community Church at 150 Eureka Street. The plaque shall include the name Metropolitan Community Church and information identifying its significance to the Castro-based LGBTQ community. Planning Department preservation staff shall review the draft commemorative signage, material, placement at the site, and language prior to issuance of architectural addenda. The final plaque shall be installed and before the temporary certificate of occupancy is issued.
- The project sponsor shall engage with SF City Guides, or another tour guide group or association as approved by Planning Department preservation staff, to develop content for a tour stop at 150 Eureka Street, the Metropolitan Community Church site, for inclusion in an existing walking tour in the Castro neighborhood. The project sponsor shall reach out to the list of tour guide groups provided by preservation staff and provide copies of communication with those groups. Once a tour guide group has been identified, the project sponsor shall engage a qualified architectural historian meeting the qualifications set forth in the Secretary of the Interior's Professional Qualification Standards to work with the sponsor and selected tour guide group to develop content for the tour stop. Tour stop content shall utilize information found in the Historic Resources Evaluation (HRE) and the Historic Resources Evaluation Response (HRER) prepared for the project and the LGBTQ Historic Context Statement. Other existing information, including photographs, news articles, oral histories, memorabilia and video, may be used to develop information for the walking tour as necessary. The qualified architectural historian and scope of work must be reviewed by preservation staff prior to site permit issuance. Preservation staff must review and approve final content of walking tour stop at 150 Eureka Street and must receive proof of receipt by the approved tour group or association prior to issuance of temporary certificate of occupancy. If the project sponsor demonstrates to preservation staff that there are no existing walking tour guide groups or associations interested in developing a tour stop for the 150 Eureka Street site, the project sponsor will deposit information about the Metropolitan Community Church site and its history at the GBLT Historical Society

archives and the James C. Hormel LGBTQIA Center at the San Francisco Public Library. The project sponsor shall prepare an executive summary about the information being deposited, which shall include a hard copy and electronic copy of the Final Environmental Impact Report, HRE, and HRER.

The project sponsor shall develop an interpretive program to commemorate the LGBTQ use at the 150 Eureka Street building and its significant association with LGBTQ history of the neighborhood and city. Development of this interpretive program shall include outreach to the LGBTQ and Castro communities in order to involve these communities and to create a broader, more authentic interpretive approach for the project site and neighborhood. This outreach process should include identification of the most appropriate theme(s), as identified in the HRER and *Citywide LGBTQ Historic Context Statement*, on which to focus the interpretation program for this site. The interpretive program shall result, at minimum, in the preparation of a publicly accessible walking tour guide to memorialize the building and its significance within the identified theme(s) associated with the neighborhood. The interpretive program should create a narrative, outline the significance of other buildings identified in the *Citywide LGBTQ Historic Context Statement*, namely their association with the similar theme(s), and develop a plaque or identifying system for properties as part of this walking tour guide.

Interpretation of the site's history shall be supervised by a qualified consultant meeting the Secretary of the Interior's Professional Qualification Standards for Architectural Historian or Historian. The interpretive materials for use in the guide may include, but are not limited to: photographs, news articles, oral histories, memorabilia, and video. Historic information contained in the *Citywide LGBTQ Historic Context Statement* and HRE and HRER for the project may be used for content. A proposal prepared by the qualified consultant, with input from the outreach conducted in the LGBTQ and Castro communities, describing the general parameters of the interpretive program shall be approved by planning department preservation staff prior to issuance of a Site Permit. The detailed content, media and other characteristics of such interpretive program, and/or any alternative approach to interpretation identified by the project

~~team, shall be approved by planning department preservation staff prior to issuance of a Temporary Certificate of Occupancy.~~

The following city-initiated change is made to the draft EIR starting on page 88 to address the bricks along the front of the buildings that are engraved with names and messages concerning the LGBTQI community.

The bricks along the front of the 150 Eureka buildings engraved with names and messages concerning the LGBTQI community (and known as a part of the Yellow Brick Road) and are not a potentially-eligible historic resource themselves. The bricks were added after the period of significance identified for MCC at 150 Eureka and therefore have not been catalogued as a character-defining feature associated with the eligibility of the building for listing on the CRHR.

Although not identified as a potentially-eligible historic resource or a contributor to the eligibility of the 150 Eureka building, the bricks have importance to the community. While brick replication and reinstallation are not required as mitigation measures as they would not reduce the unavoidable significant impact associated with demolition of the CRHR-eligible building, nevertheless, in collaboration with the project sponsor, the following Improvement Measure has been identified.

Improvement Measure IM-CR-1: Brick Demolition, Replication, and Reinstallation

The engraved bricks located on the portion of the sidewalk adjacent to the 150 Eureka Street project site are known as the Yellow Brick Road. The Yellow Brick Road bricks will be demolished as part of project construction. The project sponsor will donate the demolished bricks to the Eureka Valley Foundation for installation at the Pink Triangle Park + Memorial at 2454 Market Street. The project sponsor will inform the Eureka Valley Foundation when demolition activities at the project site are scheduled to commence. Prior to any demolition activities at the project site, Pink Triangle Park volunteers will be given 30 days to remove the bricks and transport them to the Pink Triangle Park + Memorial. After removal of the bricks, or

expiration of the 30 days, the sponsor will have no further obligations with respect to the engraved bricks.

The project sponsor will provide \$12,500 to the Horizons Foundation to cover the cost of replication the Yellow Brick Road bricks from the original brick molds and installing them at a new location. The Friends of the Yellow Brick Road at 150 Eureka Street will determine the location for installation of the reproduced bricks and will oversee their placement and installation.

ALTERNATIVES

As described above in the Summary section, the following city-initiated changes are made to the draft EIR starting on page 102 to address the comments received from the Planning Commission at the Final EIR hearing on July 12, 2018 in regards to the identification of two alternatives to add additional housing units to the site. These changes do not alter the analysis or conclusions of the draft EIR.

- The **Partial Preservation 18 Studio Units Alternative**, under which the existing building envelope would be maintained at the ground level with interior modifications as well as vertical and horizontal additions. The building interior would be adapted to accommodate 18 studio units, for a total building area of 12,010 gsf and a total building height of 40 feet. There would be no off-street vehicular parking provided, and 18 bicycle parking spaces would be provided on the site. The rear yard would be 1,445 gsf. Implementation and construction of this alternative would require a rezoning of the site from RH-2 to a higher density designation. A Planning Code Text Amendment and a Zoning Map Amendment would also be required.
- The **Full Demolition 21 Studio Units Alternative**, under which the existing building would be fully demolished and a building containing 21 studio units would be constructed in its place. The building area would be a total of 14,149 gsf with a building height of 40 feet. There would be no off-street vehicular parking provided, and 21 bicycle parking spaces would be provided on the site. The rear yard would be 1,445 gsf. A Planning Code Text Amendment and a Zoning Map Amendment would also be required.

Table VI-1 starting on page 103 of the draft EIR depicts a comparison of the proposed project with the EIR alternatives and is a duplicate of Table S-3 provided above. Table S-3/Table VI-1 has been revised to include the Partial Preservation 18 Studio Units Alternative and the Full Demolition 21 Studio Units Alternative. Table S-3/VI-1 has also been corrected for the Full Preservation Alternative, as subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. These changes do not alter the analysis or conclusions of the draft EIR.

Starting on page 129 of the draft EIR the following text has been added to describe and evaluate the Partial Preservation 18 Studio Units Alternative and Full Demolition 21 Studio Units Alternative.

PARTIAL PRESERVATION 18 STUDIO UNITS ALTERNATIVE

Description

The Partial Preservation 18 Studio Units Alternative would maintain the general building envelope at the ground level with interior modifications as well as vertical and horizontal additions. The building interior would be adapted to accommodate 18 studio units for a total building area of 12,010 gsf and a total building height of 40 feet. There would be no off-street vehicular parking provided, and 18 bicycle parking spaces would be provided on the site. The rear yard would be 1,445 gsf. The overall building height at the third and fourth level vertical addition would create a 40-foot-high building towards the center of the building mass. At the ground and second floor level, the rear building line would be 2 feet and 8 inches from the west (rear) property line. Implementation and construction of this alternative would require a rezoning of the site from RH-2 to a higher density designation. A Planning Code Text Amendment and a Zoning Map Amendment would also be required.

Impacts

Similar to the Partial Preservation Alternative, the majority of the general building envelope of the historic building would be preserved under the Partial Preservation 18 Studio Units Alternative with interior modifications and new vertical and horizontal additions along the non-character-defining secondary, north, west, and south-facing-façade partially removed to accommodate 18 studio units.

This alternative would retain most the historic building's two-story massing, and many of the existing elements of its main, street-facing façade, materials, entrance and fenestration primarily consisting of the large, multi-paned, arched window. A stepped-back transition towards the rear of the building would clearly differentiate the new construction from the original building. This alternative would retain the front-facing gable roof, fenestration pattern primarily consisting of the large, multi-paned, arched window, stucco wall cladding with brick water table, the entry sequence defined by brick stairs leading to a recessed entry, and most of the brick water table, which have been identified as character-defining features in the 2016 HRER. Setbacks from the east-facing façade of the building would also lend to the differentiation between the existing building and new construction that would rise above.

In keeping with the Secretary of the Interior's Standards for Rehabilitation, many character-defining features and materials of the existing building would be retained under this alternative including the parcel configuration, the front-facing gable roof, fenestration pattern primarily consisting of the large, multi-paned, arched window, stucco cladding with brick water table, and main entrance. The proposed two-story addition would be setback 23 feet from the main façade plane and not encroach or infringe detrimentally on the existing building's significant form, massing, or spatial relationships.

Similar to the Partial Preservation Alternative, the Partial Preservation 18 Studio Units Alternative would not avoid, but would substantially reduce the historic architectural resources impact that would result under the proposed project. In addition this alternative would not avoid the significant impact altogether because although it would retain 23 feet of the main, street-facing façade of the historic building and many of its attendant character-defining features, the Partial Preservation 18 Studio Units Alternative would demolish roughly two-thirds of the remaining original building, reconfigure its interior spaces, and introduce a two-story addition above the existing building, which, taken together, would adversely impact the integrity of materials, workmanship, design, and to a lesser degree integrity of feeling, and setting of the 150 Eureka Street building. Therefore, under this alternative the integrity of the 150 Eureka Street building, which has been determined to be individually eligible for listing on the CRHR and thus a historical resource under CEQA, would be substantially altered such that the building would no longer convey its significance as a historical resource under CEQA. While this alternative would reduce the impact to the historical resource by retaining most of the existing building and many of its character-defining features, implementation of the Partial Preservation 18 Studio Units Alternative would nonetheless result in a significant unavoidable project--level impact to historic architectural resources. Similar to the proposed project, implementation of **Mitigation Measure M-CR-1a: Documentation** and **Mitigation Measure M-CR-1b: Interpretive Program** would be required with development of the Partial Preservation 18 Studio Units Alternative.

Similar to the proposed project, the Partial Preservation 18 Studio Units Alternative would result in either less-than-significant impacts or less-than-significant impacts with mitigation for the other environmental topics discussed in the NOP/IS.

Ability to Meet Project Objectives

The Partial Preservation 18 Studio Units Alternative would not meet most of the project objectives, as more fully described below.

1. Although the Partial Preservation 18 Studio Units Alternative would re-develop a large underutilized site with high-quality, sustainable, and 18 economically feasible residential dwelling units to help to meet the projected City housing needs, this alternative would not meet the sponsor's objective to re-develop the site with family-sized three- and four-bedroom residential dwellings within the existing density designation for the site and provide off-street parking for the units. This alternative would also require rezoning of the site and a Planning Code Text Amendment and a Zoning Map Amendment as 18 units could not be built under the current RH-2 zoning.
2. Although the Partial Preservation 18 Studio Units Alternative would result in the retention of a portion of the historic architectural resource on the site, the vertical and horizontal additions that would be required to accommodate residential uses within the existing building would not result in the development of a project that is sensitive to and compatible with its RH-2-zoned residential surroundings.
3. The Partial Preservation 18 Studio Units Alternative would result in the construction of residential units on the site to contribute to the City's General Plan Housing Element goals and the Association of Bay Area Governments (ABAG) Regional Housing Needs Allocation for the City and County of San Francisco and would meet this project objective.
4. The Partial Preservation 18 Studio Units Alternative would not provide a new midblock open space to enhance the quality of life for the project's residents and neighbors.

FULL DEMOLITION 21 STUDIO UNITS ALTERNATIVE

Description

To implement the Full Demolition 18 Studio Units Alternative the existing building would be fully demolished and a building containing 21 studio units would be constructed in its place. The building area would be a total of 14,149 gsf with a building height of 40 feet. There would be no off-street vehicular parking provided, and 21 bicycle parking spaces would be provided on the site. The rear yard would be 1,445 gsf. Implementation and construction of this alternative would require a rezoning of the site from RH-2 to a higher density designation. A Planning Code Text Amendment and a Zoning Map Amendment would also be required. At the ground and second floor level, the rear building line would be 2 feet and 8 inches from the west (rear) property line.

Impacts

The Full Demolition 21 Studio Units Alternative would not preserve the existing historic building or the existing elements of its main, street-facing façade, materials, entrance and fenestration that are character-defining features in the 2016 HRER. The 150 Eureka Street building, that has been determined to be individually eligible for listing on the CRHR and thus a historical resource under CEQA, would be demolished. Therefore implementation of the Full Demolition 21 Studio Units Alternative would result in a significant unavoidable project-level impact to historic architectural resources. Similar to the proposed project, implementation of **Mitigation Measure M-CR-1a: Documentation and Mitigation Measure M-CR-1b: Interpretive Program** would be required with development of the Full Demolition 21 Studio Units Alternative Alternative.

Similar to the proposed project, the Full Demolition 21 Studio Units Alternative would result in either less-than-significant impacts or less-than-significant impacts with mitigation for the other environmental topics discussed in the NOP/IS.

Ability to Meet Project Objectives

The Full Demolition 21 Studio Units Alternative would not meet most of the project objectives, as more fully described below.

1. Although the Full Demolition 21 Studio Units Alternative would re-develop a large underutilized site with high-quality, sustainable, and 21 economically feasible residential dwelling units to help to meet the projected City housing needs, this alternative would not meet the sponsor's objective to re-develop the site with family-sized three- and four-bedroom residential dwellings within the existing density designation for the site and provide off-street parking for the units. This alternative would also require rezoning of the site and a Planning Code Text Amendment and a Zoning Map Amendment as 21 units could not be built under the current RH-2 zoning.
2. The Full Demolition 21 Studio Units Alternative would not retain the historic architectural resource on the site, and this alternative would not result in the development of a project that is sensitive to and compatible with its RH-2-zoned residential surroundings.
3. The Full Demolition 21 Studio Units Alternative would result in the construction of residential units on the site to contribute to the City's General Plan Housing Element goals and the Association of Bay Area Governments (ABAG) Regional Housing Needs Allocation for the City and County of San Francisco and would meet this project objective.
4. The Full Demolition 21 Studio Units Alternative would not provide a new midblock open space to enhance the quality of life for the project's residents and neighbors.

APPENDIX A: NOTICE OF PREPARATION/INITIAL STUDY

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following changes would be made to page 5 of Appendix A of draft EIR.

The project sponsor proposes to demolish the existing building on the site, split the existing lot into two lots, and construct two, four-story buildings with a total of four residential units and

~~eight~~four ground floor parking spaces within a total building area of approximately 13,174 gsf. Each building would be a maximum of 40 feet tall. Landscaping is proposed along the building frontage on Eureka Street. In addition, an approximately 1,116-gsf rear yard and an approximately 263-gsf penthouse deck would provide on-site open space for use by project residents.

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following changes would be made to page 16 of Appendix A of draft EIR.

Access to the site would be provided via Eureka Street. Resident access to each unit would be provided by a common entryway and from within the ground level garage. A total of ~~eight~~four parking spaces (~~four~~two full sized and ~~four~~two compact) would be provided on site. The 142-146 Eureka Street building would provide approximately ~~1,182~~591 gsf of indoor common garage area and the 148-150 Eureka Street building would provide approximately ~~1,158~~579 gsf of common indoor garage area. Each garage would include ~~two~~a tandem spaces, for ~~four~~two vehicles each. In addition, each parking garage would provide two Class 1 bicycle parking spaces. New curb cuts for each proposed garage access driveway would be 10 feet in width. Two of the three existing on-street parking spaces on the Eureka Street frontage would be removed to accommodate the new garage entrances, subject to approval by the San Francisco Municipal Transportation Agency (SFMTA).

Subsequent to the publication of the draft EIR, the project sponsor removed two parking spaces per building. The following changes would be made to page 21 of Appendix A of draft EIR.

According to Planning Code Section 151, two off-street parking spaces are permitted per dwelling unit. As the proposed project would include four dwelling units, the project would be allowed to provide eight off-street parking spaces. Thus, the proposed ~~eight~~four off-street parking spaces (~~four~~two per building) would comply with Planning Code Section 151. Planning Code Section 155.2 requires new residential buildings to provide one secured (Class 1) bicycle parking space per each dwelling unit. As the proposed project would provide two

Class 1 bicycle parking spaces in each garage (for a total of four spaces), the project would comply with the Planning Code's bicycle parking requirements.