



# RESPONSES TO COMMENTS ON DRAFT EIR

## India Basin Mixed-Use Project

PLANNING DEPARTMENT  
CASE NO. **2014-002541ENV**

STATE CLEARINGHOUSE NO. 2016062003



SAN FRANCISCO  
**PLANNING**  
DEPARTMENT

<b>Draft</b>	Draft EIR Publication Date:	<b>September 13, 2017</b>
	Draft EIR Public Hearing Date:	<b>October 19, 2017</b>
	Draft EIR Public Comment Period:	<b>September 14, 2017 – October 30, 2017</b>
<b>Final</b>	Final EIR Certification Hearing:	<b>July 26, 2018</b>





# SAN FRANCISCO PLANNING DEPARTMENT

MEMO

DATE: July 11, 2018  
TO: Members of the Planning Commission and Interested Parties  
FROM: Lisa Gibson, Environmental Review Officer  
Re: **Attached Responses to Comments on Draft  
Environmental Impact Report Case No. 2014-  
002541ENV: India Basin Mixed-Use Project**

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

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 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 October 30, 2017; 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 Michael Li at (415) 575-9107 or [michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org).

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



# **Responses to Comments on the Draft EIR**

## **India Basin Mixed-Use Project**

Prepared for

San Francisco Planning Department,  
Environmental Planning Division

Prepared by

AECOM  
300 California Street, Suite 600  
San Francisco, CA 94104

*July 11, 2018*



**INDIA BASIN MIXED-USE PROJECT  
RESPONSES TO COMMENTS**

**TABLE OF CONTENTS**

**1 INTRODUCTION ..... 1-1**

A. Purpose of This Responses to Comments Document ..... 1-1

B. Environmental Review Process ..... 1-2

    Notice of Preparation and Public Scoping..... 1-2

    Draft EIR and Public Comment Period ..... 1-2

C. Document Organization ..... 1-3

**2 PROJECT DESCRIPTION REVISIONS AND CLARIFICATIONS, AND THE REVISED PROPOSED PROJECT ..... 2-1**

A. Introduction ..... 2-1

B. Summary of Revisions to the RPD Development ..... 2-1

C. Summary of Revisions to the BUILD Development ..... 2-1

    Introduction ..... 2-1

    Summary of the Draft EIR Proposed Project and the Revised Proposed Project..... 2-1

    Commercial/Office Use..... 2-2

    Residential Use..... 2-3

    Parking, Bicycle Parking, and Loading ..... 2-3

    Institutional/Educational Uses ..... 2-4

D. Environmental Analysis of the Revised Proposed Project ..... 2-4

    Land Use and Land Use Planning ..... 2-4

    Aesthetics ..... 2-5

    Population and Housing ..... 2-6

    Transportation and Circulation..... 2-10

    Noise..... 2-18

    Air Quality..... 2-20

    Greenhouse Gas Emissions ..... 2-23

    Wind ..... 2-24

    Shadow ..... 2-25

    Recreation..... 2-26

    Utilities and Service Systems ..... 2-27

    Public Services ..... 2-29

    Biological Resources ..... 2-31

    Hydrology and Water Quality ..... 2-33

    Hazards and Hazardous Materials ..... 2-34

    Alternatives to the Revised Proposed Project ..... 2-35

E. Overall Conclusion of the Potential Environmental Impacts of the Revised Proposed Project..... 2-35

<b>3</b>	<b>PUBLIC AGENCIES, ORGANIZATIONS, AND INDIVIDUAL PERSONS COMMENTING ON THE DRAFT EIR .....</b>	<b>3-1</b>
<b>4</b>	<b>COMMENTS AND RESPONSES .....</b>	<b>4-1</b>
A.	Project Description .....	4-3
	Comment PD-1: Bay Trail Design and Features .....	4-3
	Comment PD-2: India Basin Shoreline Park Design and Features .....	4-7
	Comment PD-3: 702 Earl Street Building Park Design and Features .....	4-8
B.	Land Use and Land Use Planning .....	4-10
	Comment LU-1: Project Site Zoning and Proposed Building Heights.....	4-10
	Comment LU-2: Cumulative Land Use Impacts .....	4-11
C.	Aesthetics .....	4-13
	Comment AE-1: Effects to Views .....	4-13
	Comment AE-2: General Aesthetic Impacts .....	4-16
D.	Population and Housing .....	4-17
	Comment PH-1: Effects Related to Population Growth.....	4-17
	Comment PH-2: Transportation Network Effects Related to Housing .....	4-19
	Comment PH-3: Housing Affordability and Supply .....	4-20
	Comment PH-4: Cumulative Population and Housing and Gentrification .....	4-21
E.	Cultural Resources .....	4-27
	Comment CR-1: Banya Building is not a Historic Resource Under CEQA .....	4-27
	Comment CR-2: Historic Resources CEQA Findings .....	4-33
	Comment CR-3: Archeological Resources CEQA Findings.....	4-38
F.	Transportation and Circulation.....	4-38
	Comment TR-1: Pedestrian and Bicyclist Access to The Bay Trail .....	4-39
	Comment TR-2: Vehicle Miles Traveled Methodology and Findings.....	4-43
	Comment TR-3: Transit Capacity Impacts.....	4-49
	Comment TR-4: Loading Impacts.....	4-51
	Comment TR-5: TNCs, CPHPS Data, and Mode Split Methodology .....	4-53
G.	Noise and Vibration.....	4-62
	Comment NO-1: Noise Impacts in the Vicinity .....	4-62
	Comment NO-2: Cumulative Noise Impacts .....	4-67
H.	Air Quality.....	4-68
	Comment AQ-1: Air Quality Findings.....	4-68
	Comment AQ-2: Exposure to Pollutant Concentrations .....	4-70
I.	Greenhouse Gas Emissions .....	4-71
	Comment GG-1: Greenhouse Gas Emissions Findings .....	4-71
J.	Wind .....	4-72
K.	Shadow .....	4-72
L.	Recreation.....	4-72
	Comment RE-1: Project Design and Wildlife .....	4-72
	Comment RE-2: Recreational Programming and Signage.....	4-73
M.	Utilities and Service Systems .....	4-75



	Comment UT-1: Sewage Treatment Plant Impact and Stormwater Plan .....	4-75
	Comment UT-2: Water Supply .....	4-77
	Comment UT-3: Electrical Infrastructure .....	4-78
N.	Public Services .....	4-80
	Comment PS-1: Demand for Public Services .....	4-80
O.	Biological Resources .....	4-81
	Comment BI-1: Shorebird and Migratory Bird Impacts .....	4-82
	Comment BI-2: Bird Safe Building Guidelines .....	4-95
	Comment BI-3: Plantings at the Project Site.....	4-96
	Comment BI-4: Wetlands Impacts .....	4-97
	Comment BI-5: Cumulative Biological Impacts .....	4-98
P.	Hydrology and Water Quality .....	4-99
	Comment HY-1: Effects of Sea Level Rise .....	4-100
Q.	Hazards and Hazardous Materials.....	4-102
	Comment HZ-1: Potential Effects of Site Contamination.....	4-103
	Comment HZ-2: Proximity of Nearby Historically Contaminated Sites.....	4-105
	Comment HZ-3: Leaking Underground Storage Tanks .....	4-107
R.	Alternatives .....	4-108
S.	General Environmental Comments .....	4-108
	Comment GC-1: Language Access During CEQA Process .....	4-109
	Comment GC-2: Addressing the Banya Building in the EIR.....	4-112
	Comment GC-3: Public Review Period During CEQA Process .....	4-118
	Comment GC-4: EIR Funding .....	4-118
	Comment GC-5: Adequacy of the EIR .....	4-119
	Comment GC-6: Endorsement OF Another Public Comment .....	4-120
T.	Merits of the Project.....	4-120
	Comment ME-1: Support for the Proposed Project and Variant Design and Community Input .....	4-120
	Comment ME-2: Preference for the EIR No Project Alternative.....	4-121
	Comment ME-3: Preference for the EIR Full Preservation Alternative.....	4-122
	Comment ME-4: Preference for a 100 Percent Affordable Housing Alternative .....	4-124
	Comment ME-5: Funding Sources.....	4-124
	Comment ME-6: Preference for a 100 Percent Open Space/Park Use Alternative.....	4-125
	Comment ME-7: Preference for Additional Open Space/Park Uses on Adjacent Land .....	4-126
<b>5</b>	<b>DRAFT EIR REVISIONS .....</b>	<b>5-1</b>

**List of Tables**

Table 2-1:	Draft EIR Proposed Project Compared to the Revised Proposed Project .....	2-2
Table 2-2:	Revised Proposed Project Travel Demand by Mode.....	2-12
Table 3-1:	Public Agencies that Provided Comments on the Draft EIR .....	3-1
Table 3-2:	Organizations that Provided Comments on the Draft EIR .....	3-2
Table 3-3:	Individual Persons Who Provided Comments on the Draft EIR.....	3-3
(Revised) Table 2-3:	Summary of Proposed Project and Variant Components .....	5-10
(Revised) Table 3.1-2:	Summary of Proposed Project and Variant Components .....	5-17
(Revised) Table 3.3-4:	Population, Housing, and Employment Projections for the Proposed Project and Variant in 2022 <sup>1</sup> .....	5-18
(Revised) Table 3.5-10:	Summary of Project Person-Trips .....	5-23
(Revised) Table 3.5-11:	Project Travel Demand by Mode and Land Use (Proposed Project) .....	5-25
(Revised) Table 3.5-13:	Project Loading Demand.....	5-26
(Revised) Table 3.5-14:	Project Parking Demand.....	5-28
(Revised) Table 3.5-16:	Muni Downtown Screenlines—Baseline plus Project Conditions (Proposed Project) .....	5-30
(Revised) Table 3.5-17:	Muni Localized Screenlines—Baseline plus Project Conditions (Proposed Project) .....	5-31
(Revised) Table 3.5-18:	Regional Transit Screenlines—Baseline plus Project Conditions (Proposed Project) .....	5-33
(Revised) Table 3.5-22:	Transit Delay Impacts—Baseline plus Project Conditions .....	5-34
(Revised) Table 3.5-23:	Bicycle Parking Requirements .....	5-35
(Revised) Table 3.5-25:	Parking Supply and Demand.....	5-36
(Revised) Table 3.5-28:	Muni Downtown Screenlines—Cumulative Conditions (Proposed Project) .....	5-38
(Revised) Table 3.5-29:	Project-Specific Cordon—Cumulative Conditions (Proposed Project) .....	5-39
(Revised) Table 3.5-30:	Regional Transit Screenlines—Cumulative Conditions (Proposed Project) .....	5-41
(New) Table 3.10-1:	Theoretical Annual Available Sunlight at India Basin Shoreline Park .....	5-50
(New) Table 3.10-2:	Annual Shading at India Basin Shoreline Park .....	5-51
(New) Table 3.10-3:	India Basin Shoreline Park—Day of Maximum Shading .....	5-51
(Revised) Table <del>3.10-1</del> 3.10-4:	Theoretical Annual Available Sunlight at the India Basin Open Space Property .....	5-58
(Revised) Table <del>3.10-2</del> 3.10-5:	Annual Shading at the India Basin Open Space Property .....	5-59
(Revised) Table <del>3.10-3</del> 3.10-6:	India Basin Open Space Property—Day of Maximum Shading .....	5-59
Table <del>3.10-4</del> :	<del>India Basin Open Space Property—Time and Date of Maximum Shading .....</del>	<del>5-59</del>
(New) Table 3.10-7:	900 Innes Property—Theoretical Annual Available Sunlight.....	5-62
(New) Table 3.10-8:	Annual Shading at 900 Innes Property .....	5-62
(New) Table 3.10-9:	900 Innes Property—Day of Maximum Shading.....	5-62
(Revised) Table <del>3.10-5</del> 3.10-10:	Big Green—Theoretical Annual Available Sunlight .....	5-64
(Revised) Table <del>3.10-6</del> 3.10-11:	Big Green—Shadow Impacts .....	5-65
(Revised) Table <del>3.10-7</del> 3.10-12:	Big Green—Day of Maximum Shading.....	5-65
Table <del>3.10-8</del> :	<del>Big Green—Time and Date of Maximum Shading.....</del>	<del>5-65</del>

**List of Figures**

Figure 4-1: Proposed Bay Trail Width on the India Basin Shoreline Park and 900 Innes Properties ..... 4-5

Figure 4-2: Proposed Bay Trail Width on the India Basin Open Space and 700 Innes Properties ..... 4-6

(Revised) Figure 3.10-2: Shadow Diagram, 1 Hour after Sunrise on the Summer Solstice (June 21, 6:48 a.m.)..... 5-53

(Revised) Figure 3.10-3: Shadow Diagram, Noon on the Summer Solstice (June 21, 12:00 p.m.) ..... 5-53

(Revised) Figure 3.10-4: Shadow Diagram, 1 Hour before Sunset on the Summer Solstice (June 21, 7:34 p.m.) ..... 5-54

(Revised) Figure 3.10-5: Shadow Diagram, 1 Hour after Sunrise on the Vernal/Autumnal Equinox (March 21/September 21, 8:10 a.m.)..... 5-54

(Revised) Figure 3.10-6: Shadow Diagram, Noon on the Vernal/Autumnal Equinox (March 21/September 21, 12:00 p.m.) ..... 5-55

(Revised) Figure 3.10-7: Shadow Diagram, 1 Hour before Sunset on the Vernal/Autumnal Equinox (March 21/September 21, 6:22 p.m.)..... 5-55

(Revised) Figure 3.10-8: Shadow Diagram, 1 Hour after Sunrise on the Winter Solstice (December 21, 8:21 a.m.)..... 5-56

(Revised) Figure 3.10-9: Shadow Diagram, Noon on the Winter Solstice (December 21, 12:00 p.m.) ..... 5-56

(Revised) Figure 3.10-10: Shadow Diagram, 1 Hour before Sunset on the Winter Solstice (December 21, 3:54 p.m.)..... 5-57

(Revised) Figure 3.10-11: Shadow Diagram, Date of Maximum Overall Shading at the India Basin Open Space and Big Green, 1 Hour after Sunrise (December 2726, 8:23 a.m.)..... 5-57

(Revised) Figure 3.10-12: Shadow Diagram, Moment of Maximum Overall Shading at the India Basin Open Space (December 271, 3:0045 p.m.) ..... 5-58

**List of Attachments**

- Attachment A: Planning Commission Hearing Transcript
- Attachment B: Comment Letters on the Draft EIR

## Acronyms and Other Abbreviations

µg/m <sup>3</sup>	micrograms per cubic meter
ABAG	Association of Bay Area Governments
ADA	Americans with Disabilities Act
APE	Area of Potential Effects
APEZ	Air Pollutant Exposure Zone
AWSS	Auxiliary Water Supply System
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
Bay	San Francisco Bay
Bay Trail	San Francisco Bay Trail
Bay Trail Plan	San Francisco Bay Trail Plan
BCDC	San Francisco Bay Conservation and Development Commission
BKF	BKF Engineers
Boosters	Potrero Boosters Neighborhood Association
C.P.U.C.	California Public Utilities Commission
CARE	Community Air Risk Evaluation
CCR	California Code of Regulations
CEO	chief executive officer
CEQA	California Environmental Quality Act
CFD	community facilities district
CHTS	California Household Travel Survey
CPHPS	Candlestick Point–Hunters Point Shipyard
CPHPS Transportation Plan	Candlestick Point & Hunters Point Shipyard Phase II Transportation Plan
CRHR	California Register of Historical Resources
CRRP-HRA	Community Risk Reduction Plan Health Risk Assessment
dB	decibel(s)
DEIR	Draft Environmental Impact Report
DPR	Department of Parks and Recreation
Draft EIR	Draft Environmental Impact Report
EIR	environmental impact report
EPA	U.S. Environmental Protection Agency
FEIR	Final Environmental Impact Report
Final EIR	Final Environmental Impact Report
General Plan	San Francisco General Plan
GHG	greenhouse gas
gpd	gallons per day
gpd/du	gallons per day per dwelling unit
gsf	gross square feet
HPC	Historic Preservation Commission
HPSCAC	Hunters Point Shipyard Citizens' Advisory Committee
HPX	Hunters Point Express
HRE	historic resource evaluation
HVAC	heating, ventilation, and air conditioning
IBTAP	India Basin Transportation Action Plan
INBA	India Basin Neighborhood Association
K-8	kindergarten through 8th grade

KVP	key viewpoint
LEED	Leadership in Energy and Environmental Design
LOS	level of service
LPWMP	Low Pressure Water Master Utility Plan
M-1	Light Industrial zoning
M-2	Heavy Industrial zoning
mgd	million gallons per day
MMRP	mitigation monitoring and reporting program
Muni	San Francisco Municipal Railway
NC-2	Small-Scale Neighborhood Commercial zoning
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NO <sub>x</sub>	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
OPR	Governor's Office of Planning and Research
OS	Open Space Height and Bulk District
P&T	Page & Turnbull
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM <sub>2.5</sub>	particulate matter equal to or less than 2.5 microns in diameter
project	India Basin Mixed-Use Project
proposed project	proposed residential project
PSD	Power Systems Design
R&D	research and development
ROG	reactive organic gas
ROW	right-of-way
RPD	San Francisco Recreation and Parks Department
RTC	Response to Comments
RWQCB	regional water quality control board
RWS	Regional Water System (of the San Francisco Public Utilities Commission)
SAP	Special Area Plan
SF	San Francisco
SF Guidelines	Transportation Impact Analysis Guidelines for Environmental Review
SF-CHAMP	San Francisco Chained Activity Model Process
SFCTA	San Francisco County Transportation Authority
SFDBI	San Francisco Department of Building Inspection
SFFD	San Francisco Fire Department
sfh	square foot-hours
SFIA	San Francisco Institute of Architecture
SFMTA	San Francisco Municipal Transportation Agency
SFPL	San Francisco Public Library
SFPUC	San Francisco Public Utilities Commission
SFPW	San Francisco Public Works
SFUSD	San Francisco Unified School District
SoMa	South of Market
SSIP	Sewer System Improvement Program

SUD	special use district
TAAS	Theoretical Available Annual Sunlight
TNC	Transportation Network Companies
TPL	Trust for Public Land
USC	U.S. Code
variant	maximum commercial variant
VMT	vehicle miles traveled
WRCC	Western Regional Climate Centers
WSA	water supply assessment

---

## 1 INTRODUCTION

---

### A. Purpose of This Responses to Comments Document

The purpose of this Responses to Comments (RTC) document is to present comments submitted on the Draft Environmental Impact Report (Draft EIR) for the proposed India Basin Mixed-Use Project, to respond in writing to comments on physical environmental issues, and to revise the Draft EIR as necessary to provide additional clarity.

Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21091 (d)(2)(A) and (B), the Planning Department has considered the comments received, evaluated the issues raised, and herein provides written responses that fully address the comments on physical environmental issues raised by the 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. Such effects include physical impacts or changes attributable to the project rather than any social or financial implications of the project. Therefore, this document focuses primarily on responding to comments that relate to physical environmental issues in compliance with CEQA.<sup>1</sup> Where appropriate, this RTC document also includes EIR text changes made in response to comments.

Since publication of the Draft EIR, one of the project sponsors (BUILD) has initiated revisions to the proposed project that would increase the number of residential units, reduce the commercial square footage in the 700 Innes property, and replace the school with residential space. All references to the school under the proposed project would be removed, including impact statements TR-7 and TR-8, as well as Improvement Measure I-TR-7, “Implement an Active Loading Management Plan,” and Mitigation Measure M-TR-8, “Implement Passenger Loading Strategies for the School.” However, they would remain in the EIR for the variant, which still includes a proposed school. The changed proposed project is referred to throughout this RTC document as the “revised proposed project.” Environmental effects of the revised proposed project are analyzed in Subsection D, “Environmental Analysis of the Revised Proposed Project,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project.” Because the revised proposed project would be approved by decision-makers instead of the proposed project, the analysis of the revised proposed project’s environmental effects compared to those of the proposed project is contained entirely in Chapter 2, Subsection D.

No significant new information that warrants recirculation of the Draft EIR is: 1) provided in the comments received on the Draft EIR; 2) reflected in the changes to the proposed project as described in Subsection D, “Environmental Analysis of the Revised Proposed Project,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project”; or 3) included in the analysis of the environmental effects of the revised proposed project in Chapter 2, Subsection D. The comments do not identify, nor do the revisions to the project 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.

---

<sup>1</sup> CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3), Sections 15064(c) and (d).

The Draft EIR together with this RTC document constitute the Final Environmental Impact Report (Final EIR) for the proposed India Basin Mixed-Use Project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines Section 15132. The Final EIR has been prepared in compliance with the CEQA Guidelines and Chapter 31 of the San Francisco Administrative Code. This EIR is an informational document for use by: (1) governmental agencies (such as the San Francisco Planning Department) and the public to aid in the planning and decision-making process by disclosing the physical environmental effects of the project and identifying possible ways of reducing or avoiding the potentially significant impacts; and (2) the City Planning Commission, other Commissions/Departments and the Board of Supervisors prior to their decision to approve, disapprove, or modify the project. If the Planning Commission, Board of Supervisors, or other city entities approve the proposed project, they would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP) to ensure that mitigation measures identified in the Final EIR are implemented.

## **B. Environmental Review Process**

### **Notice of Preparation and Public Scoping**

The San Francisco Planning Department, as lead agency that is responsible for administering the environmental review of projects within the City and County of San Francisco, published a Notice of Preparation of an Environmental Impact Report and Public Scoping Meeting in compliance with CEQA and the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3), Sections 15064(c) and (d). The purpose of publishing the NOP was to inform agencies and the general public that the Draft EIR would be prepared based upon the criteria of the CEQA Guidelines, Sections 15064 (Determining Significant Effect) and 15065 (Mandatory Findings of Significance) and that a public CEQA Scoping Meeting would be held on June 19, 2016. The NOP mailing list included federal, State, and local agencies, regional and local organizations, and property owners within 300 feet of the project site. The scoping period began on June 1, 2016, and ended on July 1, 2016, and scoping meeting attendees were given the opportunity to provide written and oral comments.

### **Draft EIR and Public Comment Period**

The San Francisco Planning Department prepared the Draft EIR for the proposed India Basin Mixed-Use 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 September 13, 2017. The Draft EIR identified a public comment period from September 14, 2017 to October 30, 2017 to solicit public comment on the adequacy and accuracy of information presented in the Draft EIR. Comments were made in written form during the public comment period and as oral testimony received at the public hearing on the Draft EIR before the Planning Commission held on October 19, 2017. The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the Draft EIR. A complete transcript of proceedings from the public hearing on the Draft EIR and all written comments in their entirety are included in this document. (See Attachments A and B to this RTC document.)

The San Francisco Planning Department has distributed this RTC document to the Planning Commission as well as to the agencies, neighborhood organizations, and persons who commented on the Draft EIR. In accordance with Administrative Code Section 31.15, the Planning Commission will hold a hearing on July 26, 2018, to consider the adequacy of the Final EIR. If the Planning Commission finds the EIR to be in compliance with



CEQA requirements, it will certify the document as a Final EIR. The Final EIR will consist of the Draft EIR and this RTC document, which includes the comments received during the public review period, responses to the comments on environmental issues, and any revisions to the Draft EIR that result from staff-initiated text changes. The City decision-makers will consider the certified Final EIR, along with other information received during the public process, to determine whether to approve, modify, or disapprove the Proposed Project, and to specify the mitigation measures that will be required as conditions of project approval in a MMRP. The MMRP may also include improvement measures that are proposed to be imposed as conditions of approval. The EIR also identified improvement measures to address certain less-than-significant impacts, which improvement measures may be adopted as conditions of approval by City decision-makers.

If the City decision-makers decide to approve the proposed India Basin Mixed-Use Project with any of the significant effects that are identified in the Final EIR and not avoided or reduced to less-than-significant levels, they must indicate that any such unavoidable significant effects are acceptable due to overriding economic, legal, social, technological, or other considerations as described in CEQA Guidelines Section 15093. This is known as a Statement of Overriding Considerations, in which the City balances the benefits of a proposed project against its unavoidable environmental impacts. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (CEQA Guidelines Section 15093). If an agency adopts a Statement of Overriding Considerations, the statement must be included in the record of project approval.

### **C. Document Organization**

This RTC document consists of the following chapters:

**Chapter 1, “Introduction,”** discusses the purpose of the RTC document, the environmental review process for the EIR, and the organization of the RTC document.

**Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,”** presents revisions and clarifications to the proposed India Basin Mixed-Use Project. Chapter 2 also presents the details of the revised proposed project and analyzes whether such revisions could result in any new significant environmental impacts not already discussed in the Draft EIR.

**Chapter 3, “Public Agencies, Organizations, and Individual Persons Commenting on the Draft EIR,”** presents the names of persons who provided comments on the Draft EIR during the public comment period. This section includes four tables: written comments on the Draft EIR from public agencies, written comments on the Draft EIR from organizations, written comments on the Draft EIR from individual persons, and verbal comments on the Draft EIR received during the Planning Commission Draft EIR Hearing. Commenters are listed in alphabetical order within each category. These lists also show the commenter code (described below) and the format (i.e., letter, email, or verbal) and date of each set of comments.

**Chapter 4, “Comments and Responses,”** presents the comments excerpted verbatim from the public hearing transcript and written comments. The comments are organized by topic. They appear as italicized text in quotations and are coded in the following way:

- Written and verbal comments from public agencies are designated by an “A-” followed by the acronym of the agency’s name.
- Written and verbal comments from organizations are designated by an “O-” followed by the acronym of the organization’s name. In cases where several commenters from the same organization provided comments, the acronym is followed by the commenter’s last name.
- Written and verbal comments from individual persons are designated by an “I-” followed by the commenter’s last name.

**Chapter 5, “Draft EIR Revisions,”** presents text changes to the Draft EIR (in addition to text changes indicated in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” that have been made as a result of a response to comments (indicated in Chapter 4, “Comments and Responses”) and/or staff-initiated text changes identified by Planning Department staff to update, correct, or clarify Draft EIR text. These changes and minor errata do not result in significant new information with respect to the proposed India Basin Mixed-Use Project, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5 is not required.

**Attachment A, “Planning Commission Hearing Transcript,”** and **Attachment B, “Comment Letters on the Draft EIR,”** present, respectively, a copy of the complete transcript of the Planning Commission hearing, with individual comments bracketed and coded as described above, and written communications received by the Planning Department during the Draft EIR public review and comment period in their entirety. An additional code points the reader to the topic in Chapter 4, “Comments and Responses,” in which the bracketed comment appears and the response that addresses it.

This RTC document, along with the Draft EIR, 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 (and the Initial Study, which is an appendix to the Draft EIR), the comments received during the public review period, the Responses to Comments document, any revisions to the Draft EIR that result from public agency and public comment, and any Planning Department staff initiated text changes. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. The revisions to the Draft EIR’s text called out in Section 6, “Draft EIR Revisions,” of this RTC document indicate the applicable changes of the Draft EIR text and represent the Final EIR.

---

## 2 PROJECT DESCRIPTION REVISIONS AND CLARIFICATIONS, AND THE REVISED PROPOSED PROJECT

---

### A. Introduction

Since publication of the Draft EIR, the project sponsors have initiated revisions and clarifications to the proposed India Basin Mixed-Use Project as it was described in Draft EIR Chapter 2.0, “Project Description.”<sup>2</sup> This RTC chapter describes these revisions and clarifications (new text is double-underlined and deletions are shown in ~~striketrough~~). These revisions and clarifications would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes increase the severity of any the impacts identified in the Draft EIR. Mitigation measures identified in the Draft EIR would continue to be required in order to reduce or avoid significant environmental impacts. No new or modified measures would be required to mitigate the significant impacts identified for the proposed India Basin Mixed-Use Project in the Draft EIR.

Section 15088.5 of the CEQA Guidelines requires recirculation of an EIR when “significant new information” is added to the EIR after publication of the Draft EIR but before certification. The CEQA Guidelines state that information is “significant” if “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project proponents have declined to implement.”

Section 15088.5 further defines “significant new information” that triggers a requirement for recirculation as including, but not limited to, identification of a new significant impact, a substantial increase in the severity of an impact (unless mitigation is adopted to reduce the impact 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(b) states that recirculation is not required if “new information in the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

### B. Summary of Revisions to the RPD Development

Since publication of the Draft EIR, RPD has added or removed the following text in the Draft EIR Project Description. New text is double-underlined and deletions are shown in ~~striketrough~~.

The second bullet on EIR p. 2-28 under the heading, “RPD Development,” has been revised, as follows:

- The *Sage Slopes* would include a playground, adult fitness programming, walking trails, two basketball courts, skate trails nestled within plantings of native California sage scrub, and a viewing

---

<sup>2</sup> Other changes to the proposed project, which has been renamed “revised proposed project,” also are described and analyzed in Chapter 3. After the Draft EIR was published on September 13, 2017, the project sponsors made changes to the proposed residential and commercial development program mix, resulting in 266,224 gsf more residential space and 66,224 gsf less commercial space. However, the building footprint, size, and massing would remain the same. Chapter 3 describes and analyzes these revisions to the proposed residential and commercial development program separately, rather than making changes throughout the Draft EIR.

deck outlining the hull of the *Bay City*.<sup>3</sup> Walking trails through the *Sage Slopes* and other shoreline areas would be limited to locations that would avoid and protect sensitive natural habitats.

The first full paragraph on EIR p. 2-29 has been revised with the following sentence:

The 5.6-acre India Basin Shoreline Park property would be redesigned to serve the surrounding community and enhance citywide program offerings. The Blue Greenway/Bay Trail and a Class 1 bikeway would continue through this park. The Blue Greenway/Bay Trail would be between 12 feet wide and 24 feet wide throughout the properties and would connect seamlessly to the existing Blue Greenway/Bay Trail. In the portions of the Blue Greenway/Bay Trail that would be a minimum of 12 feet wide, the trail would not include shoulders. Pedestrian, bicycle, and vehicular access to the shoreline would be enhanced (Figure 2-4a). Potential project elements for this property include improved and upgraded playground and recreational facilities including two basketball courts; restrooms; additional trees; interpretive exhibits explaining the history of the India Basin Scow Schooner Boatyard, including the remains of the various ship hulls located within the confines of the India Basin Shoreline Park; improved lawn areas; a promenade; event areas; a water feature; barbeque pits; drinking fountains; a pier and dock with human-powered boat launch ramp, art installations, fishing areas, and lighting; and an exercise or cross-training course. The existing surface parking, vehicular access, and drop-off and loading zones also may be improved. In addition, 0.64 acre of tidal marsh and wetlands would be created along the shoreline.

The second full paragraph on EIR p. 2-29 has been revised, as follows:

The 900 Innes property would be developed as a waterfront park providing a connection between India Basin Shoreline Park and the India Basin Open Space. This park also would provide a connection for the 12- to 24-foot-wide Blue Greenway/Bay Trail, the Class 1 bikeway, and pedestrian and bicycle access to the shoreline. Other potential project elements for this property include piers, fishing areas, plazas, event areas, tidal marshes, facilities for concessions, drinking fountains, restrooms, passive recreational areas for picnicking, shade structures, bicycle parking, wayfinding signage, and historical and educational displays.

The fifth full paragraph of the Draft EIR, on p. 2-37 under Section 2.3.3, “Architecture and Design,” has been revised as follows:

Proposed structures would be constructed to the standards required by the San Francisco Green Building Ordinance, which establishes Leadership in Energy and Environmental Design (LEED) certification levels or GreenPoint Rated system points for various types of buildings. Specifically, the proposed RPD development would be constructed to a LEED Gold rating or equivalent, and the BUILD development would be constructed to a LEED Silver rating or equivalent. On the India Basin Shoreline Park property, wildlife-proof trash and recycling containers would be installed. In addition, all buildings and lighting would follow the provisions of the San Francisco Better Streets Plan for lighting and San Francisco’s Standards for Bird Safe Buildings. Because of the length of the buildout period for the RPD properties,

---

<sup>3</sup> As a component of the interpretive exhibit would be installed on the viewing deck outlining the hull of the *Bay City*, park visitors could read about the vessel while simultaneously viewing its remains from the deck.

the design details of individual buildings and structures would be further refined as specific building permits are sought.

The second full paragraph of the Draft EIR, on p. 2-38 under Section 2.3.3, “Architecture and Design,” has been revised with the following sentence:

The Marineway lawn component of the proposal would extend north from the park entry and terminate at the water, at a beach for people to sit or kayakers to launch boats during higher tides, while a fixed pier would extend out into India Basin to meet a new floating platform. A viewing deck with seat steps extending to the edge of the enhanced Marsh Edge would be constructed over the buried remains of the *Bay City*, one of the historic ship hulls located within the Park. The deck would function as an interpretive exhibit conveying the history of the India Basin Scow Schooner Boatyard, including the remains of the *Bay City*. An outfitter building, located on land adjacent to the pier, would provide storage for kayaks, canoes, and life jackets; a kayak and canoe rental service; and office space to operate RPD programming. Members of the public would launch their own boats as well as the rental kayaks and canoes, and covered areas for shelter would provide space for birders, outdoor classes, and picnicking. Pursuant to San Francisco Park Code Sections 3.09 and 4.01, the following activities are prohibited from the India Basin Shoreline Park: fireworks, light shows, balloon releases, candles on the water, and drones.

The fifth full paragraph of the Draft EIR, on p. 2-40 under Section 2.3.4, “Landscaping,” has been revised as follows:

The Marsh Edge area would be restored by replacing the hard riprap edge along India Basin Shoreline Park with a soft, vegetated buffer that would provide habitat for birds and animals and improve the park’s ability to adapt to sea-level rise and storm surges. The India Basin Shoreline Park would also include interpretive signage or exhibits educating park visitors about the area’s history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The last paragraph of the Draft EIR, on p. 2-40 that continues on p. 2-41 under Section 2.3.4, “Landscaping,” has been revised as follows:

On the 900 Innes property, the proposed Scow Schooner Boatyard area would feature shoreline plantings, a water feature, seating and picnic tables, and restored artifacts from the boatyard, such as the marine way rails and potentially the tool shed interpretive structure. The existing concrete surface at the boatyard would remain in place wherever possible and resurfaced to create an ADA-compliant surface, and selected areas of crumbling concrete could be replaced with tidal marsh wetlands. Historic pathways would be retained and highlighted through the use of scale and materials and the historic yard areas would be retained as an open area with minimal plantings. The 900 Innes property would also include interpretive signage or exhibits educating park visitors about the area’s history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette

indicating activities encouraged and prohibited, including prohibiting dogs from being off-leash and people from walking off-trail into sensitive habitat areas. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The second full paragraph of the Draft EIR, on p. 2-41 under Section 2.3.4, “Landscaping,” has been revised as follows:

Existing wetlands and tidal marshes on the India Basin Open Space property would be enhanced and new tidal marsh would be created in the property’s northwest and northeast sections. Approximately 0.31 acres of new seasonal wetlands would be created. ~~Grading and earthwork would occur and~~ Native and adaptive species would be planted. There would also be an elevated pedestrian boardwalk, pier, and gravel beach. The India Basin Open Space property would include interpretive signage or exhibits educating park visitors about the area’s history and ecology. Similar to all RPD parks, the India Basin Open Space property would also include park rules and etiquette signage indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The third full paragraph of the Draft EIR, on p. 2-41 under Section 2.3.5, “Shoreline and In-Water Uses,” has been revised as follows:

Finally, a gravel beach would be created at the end of the grass Marineway for people to sit or kayakers to launch boats during higher tides. Between November and March, no RPD programming involving on-water activities would be scheduled. In addition, RPD has located the India Basin Shoreline Park parking lot adjacent to the pier to prevent the transport of hand-powered boats through sensitive shoreline habitat.

The fourth full paragraph of the Draft EIR, on p. 2-46 under “Pedestrian and Bicycle Access and Circulation,” has been revised as follows:

Both the proposed project and the variant would include a network of new pedestrian pathways and Class 1 and 3 bicycle lanes to enable a minimum of an approximately 12-foot-wide continuous Blue Greenway/Bay Trail and multiple points of access between the India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes properties. Continuous access to the future Northside Park immediately to the east, part of the Candlestick Point–Hunters Point Shipyard project, would also be provided. Figures 2-11b, 2-12b, and 2-13b show the proposed pedestrian and bicycle circulation and access.

On Draft EIR p. 2-59, the following text has been provided to further clarity on multimodal signage as it relates to the Bay Trail.

Multimodal Wayfinding Signage: Provide directional signage for locating transportation services (shuttle stop), regional bicycle and pedestrian facilities (Bay Trail), and amenities (bicycle parking).

## **C. Summary of Revisions to the BUILD Development**

### **Introduction**

This section of the Responses to Comments (RTC) document introduces revisions to the Draft EIR (Draft EIR) that result from modifications to the proposed project. Since publication of the Draft EIR, one of the project sponsors (BUILD) has initiated revisions to the proposed project that would increase the number of residential units, reduce the commercial square footage within the 700 Innes property, and replace the school with residential space. The changed proposed project is referred to throughout this chapter as the “revised proposed project.” The revisions to the RPD development described immediately above would apply to both the revised proposed project summarized in this section and the variant described in the Draft EIR.

This section includes new information pertaining to the revised proposed project, which replaces the proposed project. 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 Draft EIR. Therefore, recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5 is not required.

The revised proposed project would add 335 residential units to the 1,240 residential units analyzed in the Draft EIR, increasing the total number of proposed residential units to 1,575 units. The increase in residential square footage would replace 66,224 gross square feet (gsf) of commercial use, as well as the 50,000-gsf proposed school. In addition to these use changes, 150,000 gsf would be added to the residential square footage through interior changes within the building envelopes previously analyzed in the Draft EIR (e.g., smaller units and common areas, lower floor-to-floor heights, improved interior building efficiencies). This change in the development program would fit within the previously analyzed building envelopes, and there would be no changes to the height, width, or length of any buildings. As a result, the overall envelope of new development under the revised proposed project would total 3,462,550 gsf, an increase of 150,000 gsf over the proposed project analyzed in the Draft EIR.

This section describes the proposed changes to the project description and, for each environmental topic, analyzes whether the revised proposed project would result in any new significant environmental impacts not already discussed in the Draft EIR for the proposed project. All Staff-initiated text changes that were made based on changes to the BUILD project are contained in Chapter 5, “Draft EIR Revisions.”

### **Summary of the Draft EIR Proposed Project and the Revised Proposed Project**

The residential square footage and unit count, commercial square footage, institutional/educational space, and number of bike spaces are the only components of the revised proposed project that differ from the proposed project that was analyzed in the Draft EIR (Table 2-1). The additional 335 units would fit into the building envelope described in the Draft EIR and would not affect the publicly accessible recreation/open space or the

parking and loading area. The proposed 679,900 gsf of parking area and corresponding 1,800 spaces would serve the 1,575 units.<sup>4</sup>

**Table 2-1: Draft EIR Proposed Project Compared to the Revised Proposed Project**

Proposed Feature	Draft EIR Proposed Project	Revised Proposed Project	Difference
Residential Space (# of units)	1,240,100 gsf (1,240 units)	1,506,324 gsf (1,575 units)	+266,224 gsf (+335 units)
Commercial Space—retail, office, R&D	275,330 gsf	209,106 gsf	-66,224 gsf
Institutional/Educational Space	50,000 gsf	0 gsf	-50,000 gsf
Parking Space (# of spaces)	679,900 gsf (1,800 spaces)	679,900 gsf (1,800 spaces)	0 gsf
Publicly Accessible Recreation/Open Space (# of acres)	1,067,220 sq. ft. (24.5 acres)	1,067,220 sq. ft. (24.5 acres)	0 sq. ft.
<b>Total Space</b>	<b>3,312,550 gsf</b>	<b>3,462,550 gsf</b>	<b>150,000 gsf</b>
Building Heights (# of floors)	160 feet (14 floors)	160 feet (14 floors)	0 feet
Building Footprint (# of acres)	422,532 gsf (9.7 acres)	422,532 gsf (9.7 acres)	0 gsf
# of Bike Spaces	1,240 spaces	1,575 spaces	+335 spaces

Notes: # = number; gsf = gross square feet; R&D = research and development; sq. ft. = square feet

Source: Compiled by AECOM in 2018

Changes were made only to the proposed project to create the revised proposed project; the variant remains the same as described in the Draft EIR. The variant proposed 417,300 gsf of residential space (500 units) and 1,000,000 gsf of commercial space: retail, office, research and development (R&D), and 50,000 gsf of institutional/educational space.

### Commercial/Office Use

Under the revised proposed project, up to 209,106 gsf of commercial, retail, R&D, or flex space would be developed at select ground-floor locations (see Figure 2-4b in Draft EIR Chapter 2.0, “Project Description”). This represents a reduction of 66,224 gsf relative to the 275,330 gsf of commercial/office uses described in the Draft EIR. Space for these uses would be subtracted equally from all buildings proposed to include commercial space. Commercial and retail uses would remain distributed throughout the development, but in lower square footages. Commercial space would continue to be built at designated locations throughout the project in accordance with the special use district (SUD). Uses could include food markets, retail sales, dry cleaners, coffee shops, artist studios, restaurants and bars, commercial venues that would relate to shoreline activities (e.g., sports, leisure), and a childcare facility. The on-site childcare facility described on p. 2-28 of the Draft EIR Project Description would occupy the same on-site location originally stated under the proposed project.

<sup>4</sup> City and County of San Francisco, *Supplemental Memorandum to the India Basin TIS: Transportation Impacts for the “Revised Proposed Project,”* January 25, 2018. Prepared for San Francisco Planning Department by Fehr & Peers, San Francisco, CA. This document (and all other documents cited in this report, unless otherwise noted) is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File 2014-002541ENV.



## Residential Use

Under the revised proposed project, up to 1,575 residential units (1,506,324 gsf) would be developed in buildings ranging from one to 14 stories (20–160 feet tall) (see Figures 2-4b, 2-5b, 2-6a, and 2-7a in Draft EIR Chapter 2.0, “Project Description”). Building envelopes, heights, widths, and lengths would generally remain the same as under the proposed project. Residential square footage would also replace (i) 66,224 gsf of commercial space distributed throughout the 700 Innes property and (ii) the 50,000-gsf proposed school. Furthermore, decreasing floor-to-floor heights and improving interior building efficiencies would account for the remainder of the increase in residential square footage. In addition, the floor plans of the units and some of the common areas would also be reduced in size. For example, the average unit size is anticipated to decrease from approximately 1,000 square feet to approximately 956 square feet. The percentage of studios, one-bedroom units, two-bedroom units, and three-bedroom units would be the same as under the proposed project. As a result of the overall increase in residential units under the revised proposed project, the total number of residential units would increase by 32 studio units, 38 one-bedroom units, 111 two-bedroom units, and 19 three-bedroom units, resulting in an overall unit mix of 252 studio units (16 percent), 299 one-bedroom units (19 percent), 867 two-bedroom units (55 percent), and 157 three-bedroom units (10 percent).

The revised proposed project is subject to the San Francisco Inclusionary Affordable Housing Program (San Francisco Planning Code Section 415). The project sponsor would comply with the program by either providing on-site or off-site units or paying an in-lieu fee, as required by the Planning Code, or as otherwise specified in the development agreement.

## Parking, Bicycle Parking, and Loading

The revised proposed project would provide parking and loading areas of the same size as those provided by the proposed project. As stated in the Draft EIR, approximately 679,900 gsf of off-street vehicle parking would be provided, primarily in three large, shared, underground garages (see Figure 2-120b in Draft EIR Chapter 2.0, “Project Description”). These garages, accessible via five entrances, would provide up to 1,800 vehicle spaces for residents, guests, and nonresidential uses.

In addition, the revised proposed project would provide a minimum of 1,575 Class 1 and Class 2 bicycle parking spaces on the 700 Innes property, an addition of 335 more bicycle spaces than described for the proposed project in the Draft EIR, in accordance with San Francisco Planning Code requirements. Class 1 spaces would be distributed throughout the residential building developments on the ground-floor and/or garage levels and in parking areas. The Class 2 bicycle parking spaces would be provided on sidewalks throughout the 700 Innes property’s open space area for recreational users, visitors, and guests, in accordance with the India Basin Special Use District. These improvements would be included as part of the transportation demand management measures that would be incorporated into the revised proposed project.

The revised proposed project’s vehicle loading zones would be the same as those described for the proposed project. The 700 Innes property would have 14 off-street loading spaces, including four on-street loading zones at street level, one zone on Earl Street, two on Fairfax Lane, and one on Arelious Walker Drive. The on-street loading zones would be used for passenger pickup and drop-off or temporary commercial loading (i.e., mail package delivery), and would be located close to building entrances to keep loading times short.

## **Institutional/Educational Uses**

Under the revised proposed project, the 50,000-gsf school would not be constructed. Instead, the building space would be used as residential space.

## **D. Environmental Analysis of the Revised Proposed Project**

Because revisions to the proposed project would not apply to the variant analyzed in the Draft EIR, the following environmental analysis is limited to a comparison of the revised proposed project to the proposed project analyzed in the Draft EIR. In addition, the revised proposed project would be relevant only to the 700 Innes property and would not alter the Draft EIR analysis for the India Basin Shoreline Park, 900 Innes, and India Basin Open Space properties. Therefore, the following environmental analysis is limited to a comparison of the project-level and cumulative impacts of the revised proposed project at the 700 Innes property to the project-level and cumulative impacts of the proposed project at the 700 Innes property.

### **Land Use and Land Use Planning**

The proposed project's land use impacts are described and analyzed in Draft EIR Section 3.1, "Land Use and Land Use Planning," pp. 3.1-1 through 3.1-22. The Draft EIR concluded that the proposed project would not physically divide an existing community and would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Furthermore, the Draft EIR determined that all impacts related to land use and planning would be less than significant. The revised proposed project would include more units, more bicycle parking spaces, and less commercial space than the proposed project analyzed in the Draft EIR. However, the revised proposed project would be built within the same building envelope as the proposed project, and thus, would have the same impacts as the proposed project with respect to physically dividing a community.

Conflicts with existing plans and policies do not, in and of themselves, indicate a significant environmental effect related to the topic of land use and land use planning within the meaning of CEQA, unless the project substantially conflicts with a land use plan or policy that was adopted for the purpose of avoiding or mitigating an environmental effect, in such a way that a substantial adverse physical change in the environment related to land use would result. The discussion below relates to existing plans and policies that were in part adopted for the purpose of avoiding or mitigating an environmental effect. As discussed in further detail below, the additional units, more bicycle parking spaces, and less commercial and educational/institutional space included under the revised proposed project would not alter the analysis included in the Draft EIR regarding the proposed project's conflicts with existing plans and policies.

To the extent the additional units, more bicycle parking spaces, and less commercial and educational/institutional space included under the revised proposed project would conflict with the San Francisco General Plan (General Plan), similar to the proposed project, the project sponsors propose to seek amendments to these plans to bring these plans and the revised proposed project into conformity. As a result, the revised proposed project would not result in conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project as reflected in the Planning Code or General Plan. As to a conflict with the configuration of the Waterfront Park/Beach Priority Use Area and Park Priority Use designations in the San Francisco Bay Plan and San Francisco Waterfront Special Area Plan (SAP), respectively, similar to the proposed project, the project sponsors

propose to seek an amendment to these plans. Similar to the proposed project, the revised proposed project would be generally consistent with policies in the Bay Plan and San Francisco Waterfront SAP. The revised proposed project, like the proposed project, is designed to minimize Bay fill and promote open space uses and public access along the waterfront. The San Francisco Bay Conservation and Development Commission (BCDC) will determine consistency of the revised proposed project with the McAteer-Petris Act and the policies of the Bay Plan and the San Francisco Waterfront SAP when considering whether to approve permits for the revised proposed project. For these reasons, impacts of the revised proposed project related to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be the same as the proposed project.

For these reasons, impacts of the revised proposed project would be the same as the proposed project's impacts described in the Draft EIR. The impacts of the revised proposed project related to land use and planning would be *less than significant*.

### ***Cumulative Impacts***

The Draft EIR concluded that development of cumulative projects would not result in physical divisions of existing communities or conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Based on this assessment, the Draft EIR concluded that development of cumulative projects would have a less-than-significant impact related to land use and land use planning. As stated above, project-level impacts from the revised proposed project would be the same as the proposed project's impacts. Therefore, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative impact related to land use and land use planning.

### **Aesthetics**

The proposed project's impacts on aesthetics are described and analyzed in Draft EIR Section 3.2, "Aesthetics," pp. 3.2-1 through 3.2-56. The Draft EIR concluded that the proposed project would not have a substantial adverse effect on scenic vistas or scenic resources and would not degrade the existing visual character or quality of the site and its surroundings, and that impacts related to light or glare would be less than significant after mitigation. Furthermore, the Draft EIR determined that all impacts related to aesthetics would be less than significant or less than significant with mitigation.

The increase in residential units and decrease in commercial and educational/institutional space under the revised proposed project would not involve substantial physical changes to the building envelope previously analyzed for the proposed project in the Draft EIR. The height, width, and length dimensions would remain the same. The increase in bicycle parking spaces under the revised proposed project would not affect scenic vistas or resources, nor would it degrade the visual character or quality of the site. The increase in bicycle parking would not change any of the conclusions reached in the Draft EIR. Mitigation Measure M-AE-3 on p. 3.2-52 of the Draft EIR would also apply to the revised proposed project, which would minimize light spillover from buildings constructed under this revised scenario.

For these reasons, impacts of the revised proposed project would be the same as the proposed project's impacts described in the Draft EIR. The impacts of the revised proposed project related to aesthetics would be less than significant with mitigation.

### ***Cumulative Impacts***

The Draft EIR concluded that development of cumulative projects would have a less-than-significant construction impact, and less-than-significant operational impacts related to scenic resources and visual character and quality, but would have significant cumulative impacts related to scenic vistas and light and glare. The Draft EIR concluded that after implementation of Mitigation Measure M-AE-3, the proposed project would not make a considerable contribution to cumulative light and glare impacts, and that cumulative aesthetic impacts would be less than significant with mitigation. The revised proposed project would add 335 residential units or 266,224 gsf, but would also reduce the commercial square footage by 66,224 gsf and the educational/institutional gsf by 50,000 gsf. This change in the development program would fit within the previously analyzed building envelope, and would not change the height, scale, or massing of the buildings. Therefore, the revised proposed project's contribution to a significant cumulative impact with respect to light, glare, and scenic vistas would be the same as the proposed project's less-than-significant contribution. For these reasons, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative aesthetic impact after implementation of Mitigation Measure M-AE-3.

### **Population and Housing**

The proposed project's impacts on population and housing are described and analyzed in Draft EIR Section 3.3, "Population and Housing," pp. 3.3-1 through 3.3-14. The Draft EIR concluded that the proposed project would not induce population growth or displace a substantial number of people or housing, thereby necessitating the construction of replacement housing. Furthermore, the Draft EIR determined that all impacts related to population and housing would be less than significant.

The revised proposed project would increase the number of residential units and reduce the amount of commercial and educational/institutional space on the 700 Innes property. The revised proposed project would construct 1,575 residential units (335 more units than the proposed project), which would result in approximately 4,316 permanent residents at the project site, or 915 additional permanent residents compared to the proposed project analyzed in the Draft EIR.<sup>56</sup> The revised proposed project would include 66,224 gsf less commercial space than the proposed project, which would result in approximately 706 total employees at the project site, or 223 fewer employees than analyzed in the Draft EIR. The revised proposed project would not include the school, which would result in approximately 494 fewer students on the project site. Impacts related to removal of the school are described further under "Public Services," below.

Population and housing growth are examples of economic and social changes. Generally, a project that induces population growth is not viewed as having a significant impact on the environment unless this growth is

---

<sup>5</sup> Victoria Lehman, Assistant Project Manager, BUILD, e-mail correspondence with Elliott Schwimmer, Environmental Planner, AECOM, February 1, 2018.

<sup>6</sup> This number is based on the total population and total number of occupied housing units in the India Basin area, Bayview/Hunters Point area, and City and County of San Francisco in 2014.

unplanned and results in significant physical impacts on the environment. In addition, this analysis considers whether the revised proposed project would contribute to substantial daytime and/or residential population growth. “Substantial” growth is defined as increases in population that are unplanned, without consideration of or planning for infrastructure, services, and housing needed to support proposed residents, employees, and visitors.

As stated on Draft EIR page 3.3-9, the population growth impacts of development at all four properties at the project site are planned for in the Bayview Hunters Point Area Plan, and thus, would be consistent with the City’s planned future population growth for this area of the City. Thus, the growth and changes in employment and population, and potential demand for housing that would occur with implementation of the revised proposed project would not be considered adverse physical impacts in and of themselves. Secondary effects of population growth are analyzed in their respective sections of the EIR, including Section 3.5, “Transportation and Circulation”; Section 3.6, “Noise”; Section 3.7, “Air Quality”; Section 3.11, “Recreation”; Section 3.12, “Utilities and Service Systems”; and Section 3.13, “Public Services.”

As stated on p. 3.3-10 in the Draft EIR, the Regional Housing Needs Assessment, which projects the Bay Area’s housing needs based on regional trends, determined that San Francisco’s fair share of regional housing needs between 2015 and 2022 is 28,870 new residential units. The addition of 1,575 housing units under the revised proposed project would represent 5.5 percent of San Francisco’s housing needs by 2022. Furthermore, because the number of permanent employees would be smaller than the number analyzed in the Draft EIR, and the increase in the number of permanent residents would be minimal, impacts of the revised proposed project would be similar to the proposed project’s impacts described in the Draft EIR.

For these reasons, impacts of the revised proposed project would be substantially similar to the proposed project’s impacts described in the Draft EIR. The impacts of the revised proposed project related to population and housing would be less than significant.

### ***Cumulative Impacts***

The Draft EIR concluded that development of the cumulative projects would have a less-than-significant impact related to population and housing because development of cumulative projects would be consistent with population and housing projections in the 2014 Housing Element of the General Plan. The revised proposed project would add 335 residential units, or 266,224 gsf of residential space, and would increase the population living at the site by 915 additional permanent residents, compared to the proposed project. The revised proposed project would also reduce commercial gsf by 66,224 gsf, resulting in 223 fewer employees at the project site compared to the proposed project. Like the proposed project, the revised proposed project’s development program would be consistent with the population and housing projections in the 2014 Housing Element of the General Plan, as well as the *Bayview Hunters Point Area Plan*, and thus, would be consistent with the City’s planned future growth for this area of the City. Therefore, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative impact related to population and housing.

## Cultural Resources

The proposed project's impacts on cultural resources are described and analyzed in Draft EIR Section 3.4, "Cultural Resources," pp. 3.4-1 through 3.4-64. The Draft EIR concluded that the proposed project would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5 due to the fact that the retention or replacement-in-kind of character-defining features of the India Basin Scow Schooner Boatyard landscape on the 900 Innes property could not be guaranteed at the time of Draft EIR publication. Therefore, this impact would be significant and unavoidable. However, the Draft EIR determined that impacts related to historical resources on the 700 Innes property, archeological resources, human remains, and tribal cultural resources overall would be less than significant with mitigation. As noted above, the revised proposed project would not alter the development program at or the Draft EIR analysis of the 900 Innes property in the Draft EIR. In addition, the revised proposed project would not change the development program for the historical resources at the 700 Innes property, and would include the same mitigation measures related to historical structures on the 700 Innes property as the proposed project.

Specifically, like the proposed project, the revised proposed project would involve relocating and rehabilitating the 702 Earl Street building in the same manner described for the proposed project, so that the relocation and rehabilitation would not materially impair the building's significance to the extent that it would no longer be eligible for listing in the CRHR. Accordingly, the analysis of the proposed project's effects to the 702 Earl Street building analyzed in the Draft EIR would also apply to the revised proposed project, because the development program would be the same. Relocating 702 Earl Street would not substantially affect the building's integrity of setting, for two reasons: the building would remain in the same general location as its historical context and the relocation would largely restore the spatial relationship of the original building's location along the shoreline before the infill of the 1960s. The rehabilitation of the 702 Earl Street building would include some minor design modifications that were not included as part of the proposed project; these minor design modifications under the revised proposed project are discussed in Chapter 4, Response PD-3, of this RTC document. The Planning Department evaluated these minor design modifications and determined that they would result in a less-than-significant impact with mitigation on the 702 Earl Street building.<sup>7</sup> Therefore, with regard to the 702 Earl Street building, the revised proposed project would result in the same less-than-significant impact with mitigation as the proposed project.

The increase in residential units and decrease in commercial space on the 700 Innes property under the revised proposed project would not involve substantial physical changes to the building envelope or the excavation/disturbance area previously analyzed for the proposed project in the Draft EIR. The revised proposed project would increase the number of bicycle parking spaces on the 700 Innes property by 335 spaces to align with the increase in residential units. However, this minor physical change would not alter the previously assessed effects from the relocation of the 702 Earl Street building for two reasons: the building would remain in the same general location as its historical context, and the relocation would largely restore the spatial relationship of the original building's location along the shoreline before the infill of the 1960s. The increase in bicycle parking in

---

<sup>7</sup> Vanderslice, Allison, San Francisco Planning Department, memorandum to Michael Li regarding 702 Earl Street Revised Plans – India Basin Mixed-Use Project (Case 2014-002541ENV), January 23, 2018.

the vicinity of 702 Earl Street would not materially impair the building as defined in CEQA Guidelines Section 15064.5.

The revised proposed project on the 900 Innes property would include the same development program as the proposed project at this property. Further, the width of the Blue Greenway/Bay Trail at the 900 Innes property and other proposed pathways within the 900 Innes property would be the same under the revised proposed project as under the proposed project. Similar to the proposed project analyzed in the Draft EIR, construction of the revised proposed project on the 900 Innes property would cause a substantial adverse change in the significance of a historical resource (as defined in CEQA Guidelines Section 15064.5) because the revised proposed project may irrevocably diminish the India Basin Scow Schooner Boatyard as a vernacular cultural landscape.

Because the impacts of the revised proposed project would be the same as those of the proposed project, the following mitigation measures described in the Draft EIR for the proposed project would also apply to the revised proposed project.

- Mitigation Measure M-CR-1a, “Prepare and Implement Historic Preservation Plan and Ensure that Rehabilitation Plans Meet Performance Criteria”
- Mitigation Measure M-CR-1b, “Document Historical Resources”
- Mitigation Measure M-CR-1c, “Develop and Implement an Interpretative Plan”
- Mitigation Measure M-CR-1d, “Retain the Boatyard Office Building”
- Mitigation Measure M-CR-1e, “Vibration Protection Plan”
- Mitigation Measure M-CR-2a, “Undertake an Archeological Testing Program”
- Mitigation Measure M-CR-3a, “Implement Legally Required Measures in the Event of Inadvertent Discovery of Human Remains”
- Mitigation Measure M-CR-4a, “Implement Tribal Cultural Resources Interpretive Program”

The only change outside of the building envelope under the revised proposed project relative to the proposed project includes an increase in bicycle spaces on the 700 Innes property. The increase in bicycle parking is associated with the increase in residential units and would be placed in proximity to the proposed residential units. The effects from the inclusion of 335 additional bicycle spaces distributed throughout the 700 Innes property would not be of a magnitude that would alter the previously assessed effects from the relocation of the 702 Earl Street building for two reasons: the building would remain in the same general location as its historical context, and the relocation would largely restore the spatial relationship of the original building’s location along the shoreline before the infill of the 1960s. The increase in bicycle parking in the vicinity of 702 Earl Street would not materially impair the building as defined in CEQA Guidelines Section 15064.5.

Therefore, the construction of these bicycle facilities would not change the conclusions reached in the Draft EIR, thus impacts would be similar to those described in the Draft EIR. For these reasons, the revised proposed project would result in a similar determination of a significant and unavoidable impact on historic resources and a less-than-significant impact with mitigation on archeological resources, human remains, and tribal cultural resources.

### ***Cumulative Impacts***

The Draft EIR concluded that development of the cumulative projects would have a less-than-significant cumulative impact related to historic architectural resources because there are no other cumulative projects in the vicinity of the Shipwright's Cottage and the India Basin Scow Schooner Boatyard Vernacular Cultural Landscape that could result in a cumulative impact to cultural landscapes. The same conclusion applies to the revised proposed project.

The Draft EIR concluded that development of the cumulative projects would result in a significant cumulative impact on archeological resources and that the proposed project would make a cumulatively considerable contribution to the significant cumulative impact. Implementation of Mitigation Measures M-CR-2a and M-CR-3a would reduce the project's contribution to cumulative impacts to less than cumulatively considerable. As a result, the Draft EIR concluded that cumulative archeological impacts would be less than significant. The revised proposed project would result in the same development program and involve similar ground disturbance activities; thus, its archeological impact would be the same as that of the proposed project and would require implementation of Mitigation Measures M-CR-2a and M-CR-3a. As a result, cumulative impacts related to archeological resources with the revised proposed project would be the same as those described in the Draft EIR: after mitigation, the revised proposed project would not make a cumulatively considerable contribution to cumulative impacts on archeological resources, resulting in a less-than-significant impact.

The overall cumulative impact on cultural resources (historic architectural resources and archeological resources) under the revised proposed project would remain less than significant with mitigation.

### **Transportation and Circulation**

The proposed project's impacts on transportation and circulation are described and analyzed in Draft EIR Section 3.5, "Transportation and Circulation," pp. 3.5-1 through 3.5-100. The transportation and circulation data cited in this section are based on the results of a memorandum prepared to analyze transportation impacts of the revised proposed project.<sup>8</sup>

The Draft EIR identified significant project-level impacts related to transit capacity (Impact TR-3) and passenger loading for the school (Impact TR-8), as well as significant cumulative impacts related to transit capacity (Impact C-TR-2). To address these impacts, the Draft EIR identified the following mitigation measures to address the proposed project's transportation and circulation impacts:

- Mitigation Measure M-TR-3P, "Implement Transit Capacity Improvements (Proposed Project)"<sup>9</sup>
- Mitigation Measure M-TR-8V, "Implement Passenger Loading Strategies for the School (Variant)"

---

<sup>8</sup> Fehr & Peers, *Supplemental Memorandum to the India Basin TIS: Transportation Impacts for the "Revised Proposed Project,"* June 6, 2018, prepared for San Francisco Planning Department.

<sup>9</sup> The transportation impacts identified in the Draft EIR are applicable to both the proposed project and project variant unless explicitly stated otherwise. Where an impact was identified only for the proposed project and not for the project variant, the mitigation measure identifier ends in "P." Similarly, where an impact was identified only for the project variant and not for the proposed project, the mitigation measure identifier ends in "V."



Mitigation Measure M-TR-8 would no longer be applicable to the revised proposed project (which would no longer include the school, and therefore, would have no impact associated with school-related passenger loading), but this measure would still apply to the variant.

The Draft EIR also identified the following mitigation measure to address cumulative transportation and circulation impacts:

- Mitigation Measure M-C-TR-2, “Implement Transit-Only Lanes”

In addition to the above mitigation measures, the Draft EIR identified several improvement measures to further reduce less-than-significant transportation and circulation impacts of the proposed project. These improvement measures, listed below, are also applicable to the revised proposed project.

- Improvement Measure I-TR-6, “Implement Queue Abatement Strategies”
- Improvement Measure I-TR-7, “Implement an Active Loading Management Plan”
- Improvement Measure I-TR-10, “Implement Construction Management Strategies”

The Draft EIR also identified the following improvement measure to further reduce less-than-significant cumulative transportation and circulation impacts:

- Improvement Measure I-C-TR-1, “Reconfigure Eastbound Approach at Jennings Street/Evans Avenue/Middle Point Road”

Table 2-2 summarizes the estimated travel demand for the revised proposed project and the difference relative to the proposed project. As shown, the travel demand for the revised proposed project would generally be similar to or less than the travel demand for the proposed project. In terms of total person-trips, the revised proposed project would generate approximately 799 fewer person-trips during the weekday a.m. peak hour and 165 fewer person-trips during the weekday p.m. peak hour, primarily associated with a reduction in automobile person-trips. The changes in overall land use mix under the revised proposed project would also result in changes in directionality, with a higher outbound (and lower inbound) share during the weekday a.m. peak hour and a higher inbound (and lower outbound) share during the weekday p.m. peak hour.

These changes are consistent with the increase in residential units, decrease in commercial space, and discontinuance of the proposal for a school under the revised proposed project, as residential uses would generally generate outbound trips to off-site workplaces and other destinations while commercial space and the school would generally attract inbound trips from off-site residences and other origins. Although the increase in residential units would increase outbound trips during the weekday a.m. peak hour and inbound trips during the weekday p.m. peak hour, these changes would be offset by a reduction in inbound trips during the weekday a.m. peak hour and outbound trips during the weekday p.m. peak hour due to the reduction in commercial space and elimination of the school, resulting in a net reduction in person-trips compared to the proposed project.

**Table 2-2: Revised Proposed Project Travel Demand by Mode**

Land Use or Property	Person-Trips by Mode					Vehicle-Trips		Transit Person-Trips	
	Auto	Transit	Bicycle	Walk	Total	In	Out	In	Out
<b>Baseline plus Project Conditions</b>									
<b>Weekday A.M. Peak Hour</b>									
Proposed Project	3,044	237	101	478	3,860	1,051	814	118	119
Revised Proposed Project	2,266	245	102	448	3,061	609	743	103	142
<b>Difference</b>	<b>(778)</b>	<b>8</b>	<b>1</b>	<b>(30)</b>	<b>(799)</b>	<b>(442)</b>	<b>(71)</b>	<b>(15)</b>	<b>23</b>
<b>Weekday P.M. Peak Hour</b>									
Proposed Project	3,372	302	103	947	4,724	994	975	200	102
Revised Proposed Project	3,163	325	106	965	4,559	1,017	818	238	87
<b>Difference</b>	<b>(209)</b>	<b>23</b>	<b>3</b>	<b>18</b>	<b>(165)</b>	<b>23</b>	<b>(157)</b>	<b>38</b>	<b>(15)</b>
<b>Cumulative Conditions</b>									
<b>Weekday A.M. Peak Hour</b>									
Proposed Project	2,735	546	101	478	3,860	946	729	310	237
Revised Proposed Project	2,021	490	102	448	3,061	542	660	212	279
<b>Difference</b>	<b>(714)</b>	<b>(56)</b>	<b>1</b>	<b>(30)</b>	<b>(799)</b>	<b>(404)</b>	<b>(69)</b>	<b>(99)</b>	<b>42</b>
<b>Weekday P.M. Peak Hour</b>									
Proposed Project	2,993	681	103	947	4,724	938	808	389	292
Revised Proposed Project	2,798	690	106	965	4,559	958	662	444	246
<b>Difference</b>	<b>(195)</b>	<b>9</b>	<b>3</b>	<b>18</b>	<b>(165)</b>	<b>20</b>	<b>(146)</b>	<b>55</b>	<b>(46)</b>
Notes: Numbers shown for both the proposed project and the revised proposed project do not reflect retail pass-by trip reductions. Pass-by traffic, which are trips coming from a separate origin and heading to a separate destination, would be associated with those traveling from Hunters Point Shipyard (or surrounding areas) and other off-site origins who stop by India Basin on their way to their ultimate destination (or vice versa from off-site origins to destinations at Hunters Point Shipyard or the surrounding areas). Because of the reduction in commercial space under the revised proposed project, it is assumed that there would similarly be a reduction in pass-by trips. Source: San Francisco, 2018									

**Impact Evaluation**

Vehicle Miles Traveled Impacts

The revised proposed project would be similar to the proposed project in terms of the type of land uses proposed, although the revised proposed project would not include a school and the amounts of each of the remaining land uses would differ slightly (more residential use and less commercial use on the 700 Innes property). As discussed in Draft EIR Section 3.5, “Transportation and Circulation,” pp. 3.5-46 through 3.5-47, the project site is located in an area where existing and future vehicle miles traveled per capita for the proposed uses are less than the corresponding existing and future regional average per capita minus 15 percent, respectively. Like the proposed project, the revised proposed project would also meet the screening criterion for proximity to transit stations.

In addition, the internal circulation network and associated changes to the external circulation network under the revised proposed project would be as described in the Draft EIR for the proposed project. Like the proposed project, the revised proposed project would include features that would alter the transportation network but would not substantially induce automobile travel.

Therefore, impacts of the revised proposed project related to vehicle miles traveled would be similar to those of the proposed project, and would be less than significant.

### Traffic Hazard Impacts

The revised proposed project would generate fewer vehicle trips than the proposed project, with approximately 513 fewer vehicle-trips during the weekday a.m. peak hour and 134 fewer vehicle-trips during the weekday p.m. peak hour. The revised proposed project would generate fewer vehicle trips in both the inbound and outbound directions during the weekday a.m. peak hour. However, minor differences in directionality with the revised proposed project would result in more inbound (and fewer outbound) vehicle trips during the weekday p.m. peak hour, as shown in Table 2-2.

The internal circulation network and associated changes to the external circulation network—including the street layout, traffic calming measures, and proposed signalization of key intersections and access points—under the revised proposed project would be the same as described in the Draft EIR for the proposed project. Relevant design standards and guidelines that would apply to the proposed project, including the India Basin Design Standards and Guidelines and the Better Streets Plan, would also apply to the revised proposed project. Therefore, traffic hazard impacts under the revised proposed project would be similar to those under the proposed project and would be less than significant.

Although traffic hazard impacts would be less than significant, Improvement Measure I-TR-6, which would implement the Planning Department's standard condition of approval regarding queue abatement related to parking garages, would also apply to the revised proposed project and would further reduce less-than-significant traffic safety impacts associated with vehicle queuing at garage driveways on the project site.

### Transit Impacts

#### *Transit Capacity*

Relative to the proposed project, the revised proposed project would generally result in similar, but slightly higher, transit ridership during the weekday a.m. and p.m. peak hours. Minor differences in directionality with the revised proposed project would result in more outbound ridership from the site during the weekday a.m. peak hour and more inbound ridership to the site during the weekday p.m. peak hour, as shown in Table 2-2. The overall differences in transit ridership between the revised proposed project and the proposed project, however, would be negligible, and would not be substantial enough to change any of the significance findings for transit capacity impacts as identified in the Draft EIR for the proposed project. Therefore, transit capacity impacts under the revised proposed project would be similar to those under the proposed project, and would be significant.

Mitigation Measure M-TR-3P, requiring funding of temporary transit service improvements to be provided by the San Francisco Municipal Transportation Agency (SFMTA) or implementation of a temporary shuttle service to be provided by the project operator, would also apply to the revised proposed project, and would reduce this impact to a less-than-significant level.

### *Transit Delay*

As described above, relative to the proposed project, the revised proposed project would generate fewer vehicle-trips and a similar number of transit person-trips during the weekday a.m. and p.m. peak hours. Therefore, average delays at intersections and bus dwell times at stops serving the project site under the revised proposed project would be similar to those under the proposed project, and differences in the magnitude of delays to transit vehicles would be negligible. Transit delay impacts under the revised proposed project would be similar to those under the proposed project, and would be less than significant.

### Bicycle Impacts

The revised proposed project would generate a similar but slightly greater number of bicycle trips during the weekday a.m. and p.m. peak hours than the proposed project. As discussed above, the revised proposed project would generate fewer vehicle-trips than the proposed project, and the internal circulation network and associated changes to the external circulation network—including streets, bikeway facilities, and other design treatments and streetscape features—under the revised proposed project would be as described in the Draft EIR for the proposed project.<sup>10</sup> Similar to the proposed project, a bikeway network within the project site would connect to nearby bikeway facilities and reduce hazards to bicyclists by providing protection and reducing bicycle/vehicle conflicts. Accordingly, differences in bicycle safety and access between the revised proposed project and the proposed project would be negligible. Bicycle impacts under the revised proposed project would be similar to those under the proposed project, and would be less than significant.

### Pedestrian Impacts

Relative to the proposed project, the revised proposed project would generate a similar level of pedestrian activity (including both walk trips to and from transit services and some trips to and from nearby complementary land uses) during the weekday a.m. and p.m. peak hours. Compared to the proposed project, pedestrian activity under the revised proposed project would be slightly lower during the weekday a.m. peak hour but slightly higher during the weekday p.m. peak hour. As shown above in Table 2-2, the revised proposed project would generate fewer vehicle-trips than the proposed project, and the internal circulation network and associated changes to the external circulation network—including streets, pedestrian facilities, and other design treatments and streetscape features—under the revised proposed project would be as described in the Draft EIR for the proposed project. Relevant design standards and guidelines that would apply to the proposed project would also apply to the revised proposed project. Similar to the proposed project, the revised proposed project would include an extensive network of on-site pedestrian facilities, along with various improvements to off-site pedestrian facilities that would help accommodate increased foot traffic, reduce pedestrian/vehicle conflicts, improve accessibility and Americans with Disabilities Act compliance, and enhance the connectivity of the pedestrian network. Accordingly, differences in pedestrian activity, safety, accessibility, and access would be negligible. Pedestrian impacts under the revised proposed project would be similar to those under the proposed project, and would be less than significant.

---

<sup>10</sup> The revised proposed project would include an additional 335 bicycle parking spaces compared to the proposed project.

Although pedestrian impacts would be less than significant, Improvement Measure I-TR-6, which would implement the Planning Department's standard conditions of approval regarding queue abatement, would also apply to the revised proposed project and would further reduce less-than-significant pedestrian impacts associated with potential vehicle queuing at garage driveways on the project site.

### Loading Impacts

#### *Commercial/Freight Loading for Proposed Uses*

The revised proposed project proposes the same supply of on- and off-street loading spaces as the proposed project (14 off-street spaces, plus two additional on-street loading zones). The proposed supply would be sufficient to satisfy the estimated freight loading/service vehicle demand for these uses under the revised proposed project (14 spaces), which would be slightly lower than the corresponding demand under the proposed project (16 spaces).<sup>11</sup> Therefore, impacts related to commercial/freight loading for the proposed uses would be similar to those under the proposed project, and would be less than significant.

Although these loading impacts would be less than significant, Improvement Measure I-TR-7, which would implement an active loading management plan, would also apply to the revised proposed project and would further reduce less-than-significant impacts related to commercial/freight loading for the proposed uses.

#### *Commercial/Freight Loading for Existing Uses to Remain*

As discussed above, changes to the external circulation network—including loading accommodations and local access for the existing uses to remain along Innes Avenue—would be the same under the revised proposed project and the proposed project. Therefore, impacts of the revised proposed project associated with loading for these existing uses would be similar to impacts of the proposed project, and would be less than significant.

#### *Passenger Loading for the Proposed School*

The revised proposed project would not include a school. Therefore, there would be no impact associated with school passenger loading under the revised proposed project. The significant impact and associated Mitigation Measure M-TR-8 for school passenger loading identified under the proposed project would not apply to the revised proposed project, but would remain in the EIR for the variant only.

### Emergency Vehicle Access Impacts

As discussed above, the internal circulation network and associated changes to the external circulation network under the revised proposed project would be the same as under the proposed project. Similar to the proposed project, proposed streetscape changes would maintain a sufficient right-of-way (ROW) for emergency vehicles and would not preclude or inhibit emergency vehicle access, and final roadway designs would be approved by the San Francisco Fire Department (SFFD) before construction. Therefore, impacts of the revised proposed project

---

<sup>11</sup> The revised proposed project would not include a school, and no commercial/freight loading demand component would be associated with this use under the revised proposed project.

related to emergency vehicle access would be similar to impacts of the proposed project, and would be less than significant.

#### Construction Impacts

The revised proposed project would feature more residential use and less commercial use than the proposed project, and would not include the proposed school. However, the total number of buildings and structures to be constructed on the site would be the same as under the proposed project. Requirements for coordination with City agencies and compliance with applicable City, state, and federal codes, rules, and regulations would apply to the revised proposed project as they would to the proposed project. Overall, differences in the construction schedule, the nature of construction activities, and the potential effects on pedestrian, bicycle, and vehicle circulation and access (and associated hazards) under the revised proposed project would be negligible. Therefore, transportation impacts related to construction under the revised proposed project would be similar to those under the proposed project, and would be less than significant.

Although these construction impacts would be less than significant, Improvement Measure I-TR-10, which would implement various construction management strategies, would also apply to the revised proposed project and would further reduce less-than-significant transportation impacts related to construction.

#### Parking Impacts

Parking demand under the revised proposed project would be similar to parking demand under the proposed project (approximately 107 fewer spaces during the weekday midday period, but approximately 62 more spaces during the weekday evening period). The revised proposed project proposes to provide off-street accessory automobile parking at the same ratios as for the proposed project, and would result in a parking deficit at the project site, similar to the proposed project. However, the project site is well served by public transit and bicycle facilities, and planned improvements under Baseline Conditions would further enhance the attractiveness and convenience of travel options not involving use of a private automobile. The revised proposed project would also include a transportation demand management program similar to that under the proposed project, which would encourage a shift in mode share away from automobiles and reduce parking demand. Overall, any potential unmet demand under the revised proposed project would not be substantial (the same as under the proposed project), and any differences in potential effects (on traffic, transit, bicycle, and pedestrian safety or transit delays) relative to the proposed project would be negligible. Therefore, parking impacts of the revised proposed project would be similar to impacts of the proposed project, and would be less than significant.

#### ***Overall Project-Level Conclusion***

The revised proposed project would not result in new or otherwise different conclusions regarding the significance of potential impacts from those discussed in the Draft EIR for the proposed project, with the exception of school-related passenger loading impacts. The revised proposed project would not include the school, so that there would be no impact associated with school-related passenger loading under the revised proposed project. However, other mitigation and improvement measures that would apply to the proposed project as described in the Draft EIR (and as listed above in the introduction to this transportation and circulation analysis) would also apply to the revised proposed project.

For these reasons, impacts of the revised proposed project at the project level would be similar to or less than the proposed project's impacts described in the Draft EIR. The impacts of the revised proposed project related to transportation and circulation would be less than significant with mitigation.

### *Cumulative Impacts*

#### Vehicle Miles Traveled, Traffic Hazard, Transit Capacity, Pedestrian, Bicycle, Loading, Emergency Vehicle Access, and Construction Impacts

As discussed above, the internal circulation network and associated changes to the external circulation network under the revised proposed project would be the same as under the proposed project. The differences in project description under the revised proposed project would result in minimal changes to transportation and circulation effects related to vehicle miles traveled, traffic hazards, pedestrians, bicycles, loading, emergency vehicle access, or construction under Cumulative Conditions, so that the impact analysis set forth in the Draft EIR for the proposed project would also apply to the revised proposed project. Therefore, cumulative impacts related to these topics under the revised proposed project would be substantially similar to the corresponding cumulative impacts under the proposed project, and would be less than significant. It should be noted, however, that the revised proposed project would not include the school that is as part of the proposed project, so that there would be no cumulative impact associated with school-related passenger loading under the revised proposed project.

In terms of cumulative effects on transit capacity, the Draft EIR concluded that the proposed project, in combination with past, present, and reasonably foreseeable projects in the vicinity of the project site, would result in significant cumulative transit capacity impacts to several Muni screenlines and corridors and to BART service on the East Bay screenline. However, the Draft EIR found that the proposed project's contribution to these significant cumulative impacts would be less than 5 percent and would, therefore, not be cumulatively considerable. In particular, the Draft EIR found that the proposed project's contribution in all such cases would be less than 1 percent.

These significant cumulative impacts would also be present under the revised proposed project. The revised proposed project would also result in similar levels of transit ridership on the affected screenlines, corridors, and operators. Although minor changes in directionality and overall transit ridership would occur under the revised proposed project, these differences would not be sufficient to cause the revised proposed project's contribution to ridership on the affected screenlines, corridors, and operators to exceed the significance threshold of 5 percent. Specifically, the revised proposed project would contribute less than 1 percent of the total ridership in all such cases, similar to the proposed project. Therefore, the revised proposed project's contribution to these significant cumulative impacts would, like for the proposed project, not be cumulatively considerable.

The differences under the revised proposed project would also not be sufficient to affect the significance findings for other screenlines, corridors, and operators, for which the Draft EIR identified less-than-significant cumulative impacts under the proposed project. In those cases, cumulative impacts under the revised proposed project would, like for the proposed project, remain less than significant.

Although the cumulative impacts discussed above would be less than significant (or the revised proposed project's contribution to any significant cumulative impacts discussed above would not be cumulatively

considerable), Improvement Measure I-C-TR-1, “Reconfigure Eastbound Approach at Jennings Street/Evans Avenue/Middle Point Road,” would apply to the revised proposed project as it would to the proposed project, because vehicle-trips under the revised proposed project would be a similar order-of-magnitude to (although less than) vehicle-trips under the proposed project.

#### Transit Delay Impacts

The Draft EIR concluded that the proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would result in a significant cumulative transit delay impact in the Evans Avenue–Hunters Point Boulevard–Innes Avenue–Donohue Avenue corridor. Vehicle-trips under the revised proposed project would be lower than under the proposed project, but would still be similar in terms of overall order of magnitude. Therefore, the revised proposed project’s contribution to this significant cumulative impact would, like for the proposed project, be cumulatively considerable.

Mitigation Measure M-C-TR-2, “Implement Transit-Only Lanes,” would apply to the revised proposed project as it would to the proposed project, and would reduce the cumulative transit delay impact to a less-than-significant level. As described in the Draft EIR for the proposed project, however, the SFMTA cannot commit to implement Mitigation Measure M-C-TR-2 at this time. Therefore, this impact would be significant and unavoidable with mitigation, similar to the proposed project.

#### **Noise**

The proposed project’s noise and vibration impacts are described and analyzed in Draft EIR Section 3.6, “Noise,” pp. 3.6-1 through 3.6-48.

#### ***Construction Noise and Vibration***

Similar to the proposed project, the revised proposed project would result in demolition and site preparation, excavation/grading, foundation work (including pile driving), and subsequent building construction activities that would temporarily and intermittently increase noise and groundborne vibration in the project vicinity. The revised proposed project does not propose any changes to building envelopes or locations on the project site. Therefore, the revised proposed project and the proposed project described in the Draft EIR would involve the same construction activities, level of construction intensity and equipment (i.e., noise sources), and distances between these noise- and vibration-producing activities and the nearest representative noise-sensitive receptors studied in the Draft EIR.

Draft EIR Section 3.6, “Noise,” pp. 3.6-1 through 3.6-48, concluded for the proposed project that construction noise and vibration impacts would be less than significant with mitigation, with predicted impacts anticipated during foundation work and installation of piles. The following construction mitigation measures described in the Draft EIR for the proposed project would also apply to the revised proposed project.

- Mitigation Measure M-NO-2a, “Implement Noise Control Measures during Project Construction”
- Mitigation Measure M-NO-2b, “Implement Noise Control Measures for Pile Driving”
- Mitigation Measure M-NO-6, “Implement Vibration Mitigation Measure for Pile Driving”



The revised proposed project would be expected to have the same potentially significant impacts. The construction-related mitigation measures listed above, including Mitigation Measure M-NO-2a, “Implement Noise Control Measures during Project Construction,” and Mitigation Measure M-NO-2b, “Implement Noise Control Measures for Pile Driving,” would be implemented so that construction noise and vibration impacts of the revised proposed project would be reduced to less-than-significant levels.

#### ***Operation—Stationary Noise Sources***

Relative to the proposed project, operation of the revised proposed project may introduce slightly more stationary-source noise sources to the area, such as individual heating, ventilation, and air conditioning (HVAC) equipment (e.g., heat pump, room air conditioner) associated with the residential units. However, this increase in building mechanical systems would be offset by reduced need for HVAC operation for the lesser gross square footage of commercial space and the elimination of the school.

The Draft EIR concluded that predicted stationary noise impacts for the 700 Innes property would be less than significant with the following mitigation.

- Mitigation Measure M-NO-3, “Design Future Noise-Generating Uses near Residential Uses to Minimize the Potential for Noise Conflicts”

Like HVAC and other noise-producing mechanical systems associated with the proposed project, such systems for the revised proposed project would need to comply with appropriate provisions of the City’s Noise Ordinance. Furthermore, Mitigation Measure M-NO-3 would apply for the revised proposed project as it would for the proposed project. Implementation of M-NO-3 would reduce noise impacts from stationary sources of the revised proposed project to less-than-significant levels.

#### ***Operation—Off-site Traffic Noise***

With respect to transportation noise sources, the revised proposed project, like the proposed project, would be expected to cause increases in future traffic volumes on nearby roadways and corresponding increases in outdoor ambient sound levels. On balance, the additional roadway traffic on nearby roadway segments near the revised proposed project and the proposed project would be similar. Similar constraints on feasible mitigation measures to those expected for the proposed project (e.g., sound walls cannot block residential driveways) would also be anticipated for the revised proposed project.

The Draft EIR concluded that the proposed project would result in significant and unavoidable noise impacts because of the predicted increase in outdoor ambient noise levels as a result of project traffic and the lack of feasible mitigation. Similar traffic noise-producing conditions and mitigation constraints for the revised proposed project would result in similar significant and unavoidable impacts for the revised proposed project.

#### ***Overall Project-Level Conclusion***

Overall, impacts of the revised proposed project would be similar to the proposed project’s impacts described in the Draft EIR. The revised proposed project would result in similar significant and unavoidable noise impacts.

### ***Cumulative Impacts***

The Draft EIR concluded that development of cumulative projects would have a less-than-significant impact related to off-site construction traffic, but would have a significant and unavoidable cumulative impact related to operational off-site roadway traffic noise. The Draft EIR also concluded that cumulative construction projects would have a less-than-significant impact related to groundborne vibration.

The revised proposed project would result in similar construction activities as the proposed project. Thus, in combination with past, present, and reasonably foreseeable development projects, the revised proposed project would result in a less-than-significant cumulative impact related to construction traffic noise and groundborne vibration.

With respect to offsite operational roadway traffic noise, the revised proposed project would generate fewer vehicle trips during the p.m. peak time period than the proposed project. The minor changes in overall land use mix under the revised proposed project would also result in slight changes in directionality, with more outbound (and lower inbound) vehicle trips during the weekday a.m. peak hour and a higher inbound (and lower outbound) share during the weekday p.m. peak hour. The overall vehicle trips, despite the slight reduction in volume and the changes in directionality, would result in a cumulatively considerable acoustical contribution to increased roadway traffic noise similar to that described for the proposed project in the Draft EIR. Therefore, this impact would be the same as described for the proposed project in the Draft EIR, specifically a significant and unavoidable cumulative impact. No feasible mitigation measures are available to reduce the significant cumulative noise impact along the affected roadway segments.

### **Air Quality**

The proposed project's impacts on air quality are described and analyzed in Draft EIR Section 3.7, "Air Quality," pp. 3.7-1 through 3.7-88.

The Draft EIR concluded that the proposed project would generate emissions of criteria pollutants and precursors during construction, operations, and overlapping construction and operational activities that could violate an air quality standard, contribute substantially to an existing or projected air quality violation, or result in a cumulatively considerable net increase in criteria pollutants. The Draft EIR also concluded that the proposed project could generate emissions that could expose sensitive receptors to substantial pollutant concentrations, and that the proposed project's overall air quality impacts would be significant and unavoidable with mitigation. The Draft EIR identified the following mitigation measures for the proposed project:

- Mitigation Measure M-AQ-1a, "Minimize Off-Road Construction Equipment Emissions"
- Mitigation Measure M-AQ-1b, "Minimize On-Road Construction Equipment Emissions"
- Mitigation Measure M-AQ-1c, "Utilize Best Available Control Technology for In-Water Construction Equipment"
- Mitigation Measure M-AQ-1d, "Offset Emissions for Construction and Operational Ozone Precursor (NO<sub>x</sub> and ROG) Emissions"

- Mitigation Measure M-AQ-1e, “Implement Best Available Control Technology for Operational Diesel Generators”
- Mitigation Measure M-AQ-1f, “Prepare and Implement Transportation Demand Management”

Mitigation Measures M-AQ-1a through M-AQ-1d would be implemented to reduce construction-related emissions of oxides of nitrogen (NO<sub>x</sub>) to the greatest extent feasible. However, even with the implementation of those mitigation measures, the proposed project would violate an air quality standard, contribute to an existing or projected air quality violation, and cause a cumulatively considerable net increase in criteria air pollutants during construction. This overall construction impact of the proposed project would be significant and unavoidable with mitigation.

The revised proposed project would not propose any changes to building envelopes or locations. Therefore, the revised proposed project would be expected to involve the same construction activities, phasing, level of construction intensity and equipment, and construction-related emissions as analyzed in the Draft EIR for the proposed project. Thus, the air quality construction impacts of the revised proposed project would likewise be significant and unavoidable with mitigation. The mitigation measures for the proposed project that were identified in the Draft EIR and discussed above would also apply to the revised proposed project.

As discussed in the Draft EIR, the average daily operational emissions for the proposed project would exceed thresholds for reactive organic gases (ROG) and NO<sub>x</sub>. Mitigation Measures M-AQ-1e and M-AQ-1f were recommended to reduce operational emissions, but the operational air quality impact would remain significant and unavoidable with mitigation. Mobile sources would be the primary source of NO<sub>x</sub> emissions; the primary source of ROG emissions would be area sources at the 700 Innes property. Based on a memorandum prepared to analyze transportation impacts of the revised proposed project, the revised proposed project would generate approximately 8 percent fewer daily vehicle-trips than the proposed project<sup>12</sup> and the associated operational NO<sub>x</sub> emissions would be reduced by approximately the same amount. Area-source emissions with the revised proposed project would be largely the same, and thus, would also continue to exceed the thresholds of significance. Therefore, the impact of the revised proposed project would be significant and unavoidable with mitigation, the same impact conclusion as reported in the Draft EIR for the proposed project.

Construction-related and operational emissions for the years 2020 through 2022 were assumed to overlap, as a portion of the proposed project would be completed while construction is completed in other project areas. The Draft EIR concluded that the combined construction-related and operational emissions for the proposed project would exceed the thresholds for ROG and NO<sub>x</sub> emissions from 2020 through 2022. Although implementing Mitigation Measures M-AQ-1a through M-AQ-1c and Mitigation Measures M-AQ-1e and M-AQ-1f would reduce emissions to the maximum extent feasible, the combined construction-related and operational emissions for the proposed project would exceed the thresholds for ROG emissions in 2021 and NO<sub>x</sub> emissions in 2020. This impact was conservatively considered significant and unavoidable with mitigation. As discussed above, the revised proposed project would have the same construction activities as the proposed project. Although the revised proposed project would result in a similar daily estimate or slight decrease in operational vehicle trips,

---

<sup>12</sup> Kosinski, Andy, Senior Transportation Engineer/Planner, Fehr & Peers, e-mail correspondence with Elliott Schwimmer, Environmental Planner, AECOM, January 18, 2018.

overall impacts related to the combined construction-related and operational emissions would be significant and unavoidable with mitigation, the same impact conclusion as reported in the Draft EIR for the proposed project.

#### Sensitive Receptors and Pollutant Concentrations

The Draft EIR concluded that the impact of the proposed project related to concentrations of particulate matter less than or equal to 2.5 micrometers in diameter (PM<sub>2.5</sub>) during construction would be significant and unavoidable because of haul truck traffic and construction equipment emissions. In terms of building square footage, the amount of construction would be the same under the revised proposed project as under the proposed project. Therefore, the number of haul truck trips and amount of construction equipment would also remain the same. The revised proposed project's impacts would be the same as the proposed project's impacts, and this impact would be significant and unavoidable with mitigation.

The Draft EIR concluded that the impact of the proposed project related to PM<sub>2.5</sub> concentrations during operations at the 700 Innes property would be significant and unavoidable because of vehicle trips to the property and the emergency generators. The revised proposed project would generate approximately 8 percent fewer vehicle trips<sup>13</sup> than the proposed project on a daily and annual basis. In addition, the number and type of emergency generators would be similar with the revised proposed project. Therefore, PM<sub>2.5</sub> concentrations under the revised proposed project would also exceed the threshold. Similar to the proposed project, this impact would be significant and unavoidable with mitigation.

Construction-related and operational activities associated with the proposed project would result in increases in emissions of diesel particulate matter (PM) that would affect lifetime excess cancer risk for both on- and off-site receptors. The Draft EIR concluded that the maximum excess cancer risk at off-site and on-site receptors would exceed the thresholds of significance. However, the maximum excess cancer risk would be below the respective thresholds after implementation of Mitigation Measures M-AQ-1a and M-AQ-1e. Therefore, the impact of health effects from diesel PM emissions and vehicle exhaust generated during construction would be less than significant with mitigation. The revised proposed project would involve the same amount of construction activity as the proposed project because it would not involve changes to the building envelope previously analyzed in the Draft EIR for the proposed project. The height, width, and length dimensions would remain the same. In addition to the overall 8 percent reduction in daily and annual vehicle trips,<sup>14</sup> the decrease in commercial and retail square footage and increase in residential square footage with the revised proposed project would result in fewer emissions from diesel delivery vehicles traveling to the 700 Innes property. Therefore, the lifetime excess cancer risk from the revised proposed project would likely be less than the values cited in the Draft EIR for the proposed project. However, based on the values estimated in the Draft EIR, the lifetime excess cancer risk for the revised proposed project would also exceed the thresholds of significance and mitigation measures would be required. As a result, the impact of the revised proposed project, similar to the proposed project, would be less than significant with mitigation.

---

<sup>13</sup> Kosinski, Andy, Senior Transportation Engineer/Planner, Fehr & Peers, e-mail correspondence with Elliott Schwimmer, Environmental Planner, AECOM, January 18, 2018.

<sup>14</sup> Kosinski, Andy, Senior Transportation Engineer/Planner, Fehr & Peers, e-mail correspondence with Elliott Schwimmer, Environmental Planner, AECOM, January 18, 2018.

## Odors

The Draft EIR concluded that both construction-related and operational odor impacts would be less than significant. The revised proposed project would use similar construction equipment and application of architectural coatings. Similar to the proposed project, odors from these sources would be localized and generally confined to the immediate area surrounding the development area. After buildout of the revised proposed project, localized odors emitted by project sources would be generated by the same sources, such as solid waste collection, food preparation, and maintenance activities. Odors from these sources should have minimal effects on on-site and off-site sensitive receptors. Therefore, odor impacts from the revised proposed project would be the same as those from the proposed project and would be less than significant.

### ***Overall Project-Level Conclusion***

Overall, impacts of the revised proposed project would be the same as the proposed project's impacts described in the Draft EIR. Impacts of the revised proposed project on air quality would be significant and unavoidable with mitigation.

### ***Cumulative Impacts***

The Draft EIR concluded that the proposed project in combination with cumulative projects would result in a cumulatively considerable impact to regional air quality and health risk in the year 2040 despite implementation of Mitigation Measures M-AQ-1d, M-AQ-1e, and M-AQ-1f. The revised proposed project would increase the permanent residential population at the project site by 915 residents compared to the proposed project, would reduce employment by 223 employees, and would remove the school.

As stated above, the revised proposed project would result in generally the same impacts as the proposed project, and thus, the same mitigation measures described above would apply to the revised proposed project. These measures would reduce the emissions and health risks associated with the revised proposed project; however, similar to the proposed project, a cumulatively considerable contribution to a cumulative impact would remain, so the cumulative impacts related to regional air quality and health risks would be significant and unavoidable.

### **Greenhouse Gas Emissions**

The proposed project's impacts related to greenhouse gas (GHG) emissions are described and analyzed in Draft EIR Section 3.8, "Greenhouse Gas Emissions," pp. 3.8-1 through 3.8-24. As noted in the Draft EIR, GHG emissions and global climate change represent cumulative impacts. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the GHG emissions from past, present, and future projects and activities have contributed and will contribute to global climate change and its associated environmental impacts. Therefore, this analysis is in a cumulative context and focuses on the revised proposed project's contribution to a cumulatively considerable impact.

As stated in the Draft EIR, the proposed project would generate GHG emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing GHG emissions. The Draft EIR concluded that the proposed project's impacts related to GHG emissions would be less than significant, and no mitigation would be required.

The Draft EIR concluded that the proposed project is consistent with the City's GHG reduction strategy and the GHG reduction goals of Executive Orders S-3-05 and B-30-15, Assembly Bill 32, Senate Bill 32, and the Bay Area 2010 Clean Air Plan. The operational impact of the proposed project with respect to GHG emissions would be less than significant.

Compared to the proposed project, the revised proposed project would increase the overall amount of land use development by 150,000 gsf; however, the vehicle miles traveled<sup>15</sup> under the revised proposed project would be substantially similar when compared to the proposed project. The revised proposed project would continue to implement the same strategies as identified in the GHG checklist included in Draft EIR Appendix G. In addition, the higher residential density under the revised proposed project would not result in more on-site emergency generators or heating/cooling equipment relative to the proposed project. Therefore, the operational impact of the revised proposed project with respect to GHG emissions would be less than significant.

## Wind

The proposed project's impacts on wind are described and analyzed in Draft EIR Section 3.9, "Wind," pp. 3.9-1 through 3.9-22. The Draft EIR concluded that the proposed project would result in a substantial increase in the wind speed and duration of hazardous winds at the project site and in its vicinity, which would substantially affect public areas or outdoor recreation facilities and result in a significant and unavoidable wind impact. The Draft EIR identified the following mitigation measures to address the proposed project's wind impact:

- Mitigation Measure M-WI-1a, "Wind Impact Analysis and Mitigation for Buildings 100 Feet or Greater in Height During Partial Buildout"
- Mitigation Measure M-WI-1b, "Temporary Wind Reduction Measures during Construction"
- Mitigation Measure M-WI-1c, "Reduce Effects of Ground-Level Hazardous Winds through Ongoing Review"

Implementation of these mitigation measures would not reduce the proposed project's wind impact to a less-than-significant level. Therefore, the Draft EIR concluded that the proposed project's wind impact would be significant and unavoidable with mitigation.

The increase in residential units, elimination of the school, and decrease in commercial space on the 700 Innes property under the revised proposed project would not involve changes to the building envelope previously analyzed for the proposed project in the Draft EIR. The building size—height, width, and length—would remain the same. Similar to the proposed project, the revised proposed project would include construction of two 160-foot-tall buildings, resulting in a substantial increase in wind speed and the duration of hazardous winds at multiple test point locations on the project site and in the surrounding area. In addition, the mitigation measures for the proposed project that were identified in the Draft EIR and discussed above would also apply to the revised proposed project.

---

<sup>15</sup> City and County of San Francisco, *Supplemental Memorandum to the India Basin TIS: Transportation Impacts for the "Revised Proposed Project,"* January 25, 2018. Prepared for San Francisco Planning Department by Fehr & Peers, San Francisco, CA.

Because construction of the revised proposed project would occur within the same building envelope as previously analyzed in the Draft EIR for the proposed project, with no increase in building height or bulk, the revised proposed project would result in the same wind impacts as the proposed project. The mitigation measures listed above would limit, to the extent feasible, new wind hazards created at full buildout of the revised proposed project.

For these reasons, impacts of the revised proposed project would be the same as the proposed project's impacts described in the Draft EIR. The impacts of the revised proposed project related to wind would be significant and unavoidable with mitigation.

### ***Cumulative Impacts***

The Draft EIR concluded the wind environment under cumulative conditions would be the same as that evaluated for the proposed project or variant by themselves, because the relevant cumulative projects listed in Table 3-1 of the Draft EIR are more than 1,500 feet away from the project site and the topography (specifically, the hill on the western side of Innes Avenue across from the project site) has the effect of isolating the proposed project from the other foreseeable development projects. Although the proposed project and variant would result in significant and unavoidable project-level wind impacts, they would not combine with past, present, or reasonably foreseeable future projects to create a cumulative wind impact. Therefore, the wind effect of the cumulative projects, in combination with the proposed project or variant, would not result in a materially different wind effect at public areas in the project vicinity than the wind conditions evaluated for the proposed project or variant.

Because the revised proposed project would occur at the same location and within the same building envelope as previously analyzed in the Draft EIR for the proposed project, the revised proposed project, like the proposed project, would not contribute to a significant cumulative impact. For this reason, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative impact related to wind.

### **Shadow**

The proposed project's impacts related to shadow are described and analyzed in Draft EIR Section 3.10, "Shadow," pp. 3.10-1 through 3.10-32. The Draft EIR concluded that the proposed project would create net new shadow on the following existing and future open spaces: India Basin Shoreline Park, 900 Innes, India Basin Open Space, and the Big Green. The net new project shadow would not adversely or substantially affect the public's ability to use and enjoy the open spaces, and the Draft EIR concluded that the proposed project's impacts related to shadow would be less than significant.

The increase in residential units, elimination of the school, and decrease in commercial space on the 700 Innes property under the revised proposed project would not involve changes to the building envelope previously analyzed in the Draft EIR, in terms of location, size, height, width, or length. As a result, the revised proposed project would cast the same shadows on existing and proposed open spaces on or near the project site as the proposed project.

For these reasons, impacts of the revised proposed project would be the same as the proposed project's impacts described in the Draft EIR. The impacts of the revised proposed project related to shadow would be less than significant.

### ***Cumulative Impacts***

The Draft EIR concluded the shadow environment under cumulative conditions would be the same as that evaluated for the proposed project or variant by themselves, because the relevant cumulative projects listed in Table 3-1 of the Draft EIR are more than 1,500 feet away from the project site and the topography (specifically, the hill on the western side of Innes Avenue across from the project site) has the effect of isolating the proposed project from the other foreseeable development projects. Therefore, the shadow effect of the cumulative projects, in combination with the proposed project or variant, would not result in a different shadow effect on outdoor recreation facilities or other public areas in the vicinity of the project site than the shadow conditions evaluated for the proposed project or variant. The Draft EIR further concluded that the proposed project or variant would not combine with past, present, and reasonably foreseeable future projects in the project vicinity to create a significant cumulative shadow impact on outdoor recreational public areas, streets, or sidewalks, and this impact was determined to be less than significant. Because the revised proposed project would occur at the same location and within the same building envelope as previously analyzed in the Draft EIR for the proposed project, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would also result in a less-than-significant cumulative impact related to shadow.

### **Recreation**

The proposed project's impacts related to recreation are described and analyzed in Draft EIR Section 3.11, "Recreation," pp. 3.11-1 through 3.11-24. The Draft EIR concluded that the proposed project would result in less-than-significant construction-related and operational impacts related to substantial physical deterioration of other recreation facilities and physical degradation of existing recreation facilities. The Draft EIR also concluded that implementation of mitigation measures identified in Section 3.5, "Transportation and Circulation"; Section 3.6, "Noise"; Section 3.7, "Air Quality"; Section 3.14, "Biological Resources"; and Section 3.15, "Hydrology and Water Quality" would reduce temporary physical environmental impacts resulting from construction of the project's recreational facilities to less than significant with mitigation.

The revised proposed project would not alter the recreation facilities or construction schedule as described in the Draft EIR for the proposed project. The revised proposed project would increase the on-site resident population on the 700 Innes property by 915 additional permanent residents compared to the proposed project. Although this would represent an increase in the number of potential visitors to existing neighborhood and regional parks and other recreational facilities compared to the proposed project, the revised proposed project would similarly include recreational facilities on all four project site properties which would be suitable for all age groups and provide opportunities for a variety of activities. Because all four project site properties would provide recreational facilities to serve the residents and visitors to the project site, they would be designed to have sufficient capacity to accommodate the increase in residents under the revised proposed project.

The increase in population under the revised proposed project compared to the proposed project would not result in the acceleration of physical deterioration of recreational facilities, because recreational use of the 700 Innes



property by the additional 915 residents compared to the proposed project would likely focus primarily on facilities within this property. Recreational use would then radiate out from the site to existing neighborhood and regional parks and other recreational facilities to a lesser extent, given the distance to these other facilities and parks and the redundancy with facilities provided on the project site. For these reasons, the new recreational facilities on the project site would accommodate and be designed for use by the new population of the 700 Innes property, as well as existing users. Based on accessibility, future residents would most likely choose to use nearby on-site facilities provided as part of the revised proposed project instead of other, more distant, parks and recreational facilities. Furthermore, local residents who use existing parks and recreational facilities may choose to visit the new facilities that would be provided with the revised proposed project, which could alleviate the rate of deterioration at nearby existing parks and recreational facilities.

With respect to temporary construction impacts of new or expanded recreational facilities, mitigation measures identified in Section 3.5, “Transportation and Circulation”; Section 3.6, “Noise”; Section 3.7, “Air Quality”; Section 3.14, “Biological Resources”; and Section 3.15, “Hydrology and Water Quality” would reduce temporary physical environmental impacts associated with construction of the revised proposed project’s recreational facilities to less than significant with mitigation.

For this reason, the revised proposed project would result in similar impacts to those described in the Draft EIR for the proposed project. The impacts of the revised proposed project related to recreation facilities would be less than significant with mitigation.

### ***Cumulative Impacts***

The Draft EIR concluded that cumulative impacts on recreation would be less than significant because the City has accounted for such growth as part of the Recreation and Open Space Element of the General Plan. The 915 additional residents under the revised proposed project compared to the proposed project would not increase the use of recreational facilities beyond what was planned for in the Recreation and Open Space Element of the General Plan. Therefore, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative impact related to recreation.

### **Utilities and Service Systems**

The proposed project’s impacts related to utilities and service systems are described and analyzed in Draft EIR Section 3.12, “Utilities and Service Systems,” pp. 3.12-1 through 3.12-32. The Draft EIR concluded that the proposed project would result in less-than-significant impacts related to wastewater treatment and new or expanded water supply resources or entitlements and that the impacts related to new water, wastewater, or stormwater facilities would be less than significant with mitigation.

The revised proposed project would include the same water, wastewater, and stormwater facilities as the proposed project evaluated in the Draft EIR. However, the number of residential units would increase and the amount of commercial space would decrease under the revised proposed project, resulting in changes to the amount of wastewater generated on the property and to the project’s overall water demand.

Because of a change (decrease) in the per-unit water demand (from 116 gallons per day per dwelling unit [gpd/du] to 90 gpd/du) that was made after the wastewater generation estimates were developed,<sup>16</sup> the average amount of wastewater generated at the 700 Innes property would decrease from the amount stated in the Draft EIR, from 155,511 gpd to 134,589 gpd, despite an increase in residential units. The revised proposed project would generate an estimated total of 0.1382 million gallons per day (mgd) of wastewater, less than the 0.1634 mgd stated in the Draft EIR for the proposed project. Therefore, the revised proposed project would use less of the average dry-weather and wet-weather treatment capacity of the Southeast Treatment Plant than stated in the Draft EIR for the proposed project. Like the proposed project, the revised proposed project would have a less-than-significant impact related to exceedance of wastewater treatment requirements.

The revised proposed project would require water, wastewater, and stormwater infrastructure similar to that described in the Draft EIR for the proposed project. Therefore, impacts of the revised proposed project related to construction of new water, wastewater, or stormwater drainage treatment facilities would be similar to those of the proposed project.

Despite the decrease in commercial use and the elimination of the school, the increase in residential use with the revised proposed project would increase the project's potable water demand from approximately 0.17 mgd to 0.195 mgd without recycled water. With recycled water, the increase in residential use would increase the potable water demand from 0.11 mgd to 0.13 mgd. The average daily potable water demand would increase by about 13 percent without recycled water and by about 20 percent with recycled water. The initial India Basin Water Supply Assessment, approved by the San Francisco Public Utilities Commission (SFPUC) on December 13, 2016, concluded that SFPUC has adequate short-term and long-term water supplies to serve the project through 2040. A subsequent water supply assessment for the revised proposed project was approved by the SFPUC on June 26, 2018. The slight increase in potable water demand under the revised proposed project would not require new or expanded water supply resources or entitlements, because the increased residential development of the revised proposed project is within the housing and employment projections of the Planning Department's Land Use Allocation 2012 and therefore is also included in the San Francisco retail water demands presented in Section 4.1 of the Urban Water Management Plan, similar to the proposed project described in the Draft EIR. The SFPUC has approved the subsequent water supply assessment for the revised proposed project because there are no changes to the project that result in a substantial increase in water demand; the 13 percent increase in water demand is not considered by the SFPUC to be substantial and would only result in a 0.01 percent increase in the SFPUC's total retail water demand. In addition, there has been no change in the circumstances or conditions that would substantially affect the ability of the SFPUC to provide water for the proposed project and no new information that would affect the conclusions of the previous water supply assessment that sufficient water supply is available.<sup>17</sup> Thus, there would be adequate water supply for the revised proposed project and, similar to the proposed project as discussed in the Draft EIR, the revised proposed project would result in less-than-significant impacts related to the need for new or expanded water supply resources or entitlements.

---

<sup>16</sup> The decrease in per unit water demand is based on the San Francisco Public Utilities Commission Water Enterprise, *2015 Retail Water Conservation Plan*, June 2016, prepared by RMC Water and Environment. This document was published after the original water demand was calculated for the project (BKF Engineers, *India Basin—Water Demands*. Memorandum, November 2, 2016).

<sup>17</sup> San Francisco Public Utilities Commission, Letter to San Francisco Planning Department, February 16, 2018.

### ***Cumulative Impacts***

The Draft EIR concluded that development of cumulative projects would have less-than-significant construction impacts related to utilities and service systems because cumulative development projects would be subject to the City's stormwater management program, the Stormwater Management Ordinance, batch wastewater discharge permit requirements, and the National Pollutant Discharge Elimination System (NPDES) permit. The Draft EIR also concluded that operational cumulative impacts would be less than significant because of the confirmation from the SFPUC that adequate short-term and long-term potable water supplies are available in the City; project compliance with the City's Stormwater Management Ordinance to reduce impacts related to stormwater; and implementation of the Sewer System Improvement Plan by the SFPUC to address sewer system impacts caused by growth in the city. The revised proposed project would add 335 residential units or 266,224 gsf and increase the population living at the project site by 915 additional permanent residents while reducing the commercial square footage by 66,224 gsf, or 223 fewer employees. The revised proposed project would also replace the 50,000-gsf school with residential space. This change in the development program would not change the cumulative construction impact conclusion in the Draft EIR because, like the proposed project and other cumulative development projects, the revised proposed project would be subject to the City's stormwater management program, the Stormwater Management Ordinance, batch wastewater discharge permit requirements, and the NPDES permit, which would reduce construction impacts to a less-than-significant level. Operational impacts associated with the revised proposed project, in combination with cumulative projects, would be less than significant because the SFPUC has adequate water supplies to meet service area demands through 2040 and approved the India Basin Water Supply Assessment (WSA) and the subsequent WSA for the revised proposed project.<sup>18-19-20</sup> Furthermore, the revised proposed project would generate less wastewater than the proposed project; therefore, the revised proposed project in combination with cumulative projects would have the same less-than-significant cumulative impact related to wastewater. The SFPUC has also proposed to extend the San Francisco Emergency Firefighting Water System to the Candlestick Point–Hunters Point development by installing Auxiliary Water Supply System infrastructure along Innes Avenue. For these reasons, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative impact related to utilities and service systems.

### **Public Services**

The proposed project's impacts on public services are described and analyzed in Draft EIR Section 3.13, "Public Services," pp. 3.13-1 through 3.13-14. The Draft EIR concluded that the proposed project would have less-than-significant impacts related to fire, police, schools, and libraries.

The revised proposed project would increase the number of residential units and reduce the amount of commercial space on the 700 Innes property. The revised proposed project is anticipated to result in 915 more permanent residents than the proposed project, and 223 fewer permanent employees on-site because of the reduction of

---

<sup>18</sup> San Francisco Public Utilities Commission, Resolution No. 16-0255, December 13, 2016.

<sup>19</sup> Ritchie, Steven R., Assistant General Manager, San Francisco Public Utilities Commission, Letter correspondence with Christopher Thomas, Environmental Planner, San Francisco Planning Department, February 16, 2018.

<sup>20</sup> San Francisco Public Utilities Commission, Resolution No. 18-0107, June 26, 2018.

66,224 gsf of commercial space.<sup>21-22</sup> In addition, under the revised proposed project, the 50,000-gsf school would not be constructed, and instead the building space would be used as residential space.

Despite the smaller number of employees on the project site, the revised proposed project would generate more demand for fire, police, schools, and libraries than the proposed project, as analyzed in the Draft EIR, because of the larger number of permanent residents. However, like the proposed project, the revised proposed project would be located in an area that is accessible by existing SFFD personnel within desired response times. Furthermore, the SFFD confirmed that current SFFD resources would be sufficient to meeting the SFFD's response time goals.<sup>23</sup> In addition, the components of the revised proposed project would be constructed according to the California and San Francisco fire codes, so the revised proposed project would not require new or altered fire protection facilities.

Like the proposed project, the revised proposed project would be within the Bayview Police District. As stated in the San Francisco Office of the Controller's Station Boundary Analysis Report,<sup>24</sup> the Bayview Police District would be able to provide adequate service to the district's future population and land uses. Therefore, because the population growth anticipated as part of the revised proposed project is within the population growth projections planned for the City in the Bayview Hunters Point Area Plan and the Association of Bay Area Government's Regional Housing Needs Assessment, the revised proposed project would not require new or altered police facilities.

The revised proposed project would add 335 residential units, which would result in approximately 184 additional K-12 students compared to the proposed project. As noted above, the 50,000-gsf K-8 school that would be constructed under the proposed project would be replaced with residential units under the revised proposed project. Moreover, the approximately 494 students that would be generated by the revised proposed project would need to be accommodated in local schools. As reported in the San Francisco Unified School District's (SFUSD's) Capital Plan, the SFUSD has capacity for more than 90,000 students; however, student enrollment in October 2016 was 55,613.<sup>25-26</sup> As a result, the SFUSD would have sufficient capacity to accommodate the 494 K-12 students (184 additional students under the revised proposed project, compared to the proposed project). In addition, BUILD would be required to pay fees to SFUSD (through the Department of Building Inspection) pursuant to Section 17620 of the California Education Code. Section 65995(h) of the California Government Code determines that such fees are considered full and complete mitigation of the impacts of development on local school systems. Therefore, because the increased demand for school services could be accommodated by the existing local schools, and because the project sponsor would be required to pay fees to SFUSD in accordance

---

<sup>21</sup> Victoria Lehman, Assistant Project Manager, BUILD, e-mail correspondence with Elliott Schwimmer, Environmental Planner, AECOM, February 1, 2018.

<sup>22</sup> This number is based on the total population and total number of occupied housing units in the India Basin area, Bayview/Hunters Point area, and City and County of San Francisco in 2014.

<sup>23</sup> Rivera, Anthony, Assistant Deputy Chief, San Francisco Fire Department, letter to Christine Wolfe of AECOM regarding fire protection services in the City of San Francisco and in the project area, March 6, 2017.

<sup>24</sup> San Francisco Office of the Controller, *District Station Boundary Analysis Report*, March 2015. Prepared by Public Safety Strategies Group, LLC, San Francisco, CA.

<sup>25</sup> San Francisco Unified School District, 2009, Capital Plan 2010-2019, <http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/capital-plan-final-2010-2019.pdf>, accessed May 16, 2018.

<sup>26</sup> San Francisco Unified School District, 2017, Facts at a Glance 2017, <http://www.sfusd.edu/en/assets/sfusd-staff/about-SFUSD/files/sfusd-facts-at-a-glance.pdf>, accessed May 16, 2018.

with the development agreement, the operational impacts related to provision of school services under the proposed project or variant would be less than significant, similar to the proposed project.

The revised proposed project would contribute to library funding through property taxes. In addition, according to the branch manager of the Bayview Linda Brooks-Burton Branch Library, the additional residents generated by the proposed project or variant would likely be accommodated by the Bayview Linda Brooks-Burton Branch Library, which was renovated and expanded in 2013.<sup>27,28</sup> Furthermore, the acting City librarian for the San Francisco Public Library confirmed the library has no plans for constructing new libraries at other locations at this time, but that a facilities master planning process would begin in 2018 that would account for future demands for library service.<sup>29</sup> Therefore, the additional 915 permanent residents and 223 fewer permanent employees on-site would not result in demand for library services that would result in the need to construct new library facilities.

For these reasons, impacts of the revised proposed project would be similar to the proposed project's impacts described in the Draft EIR. The impacts of the revised proposed project related to public services would be less than significant.

### ***Cumulative Impacts***

The Draft EIR concluded that cumulative impacts on public services would be less than significant because the public services that would serve the cumulative development projects, including the SFFD, San Francisco Police Department, SFUSD, and the San Francisco Public Library could accommodate the cumulative projects either through existing or already planned facilities. The 915 additional residents under the revised proposed project compared to the proposed project would increase demand for public services, but this increase in demand would be accompanied by a proportional increase in the development impact fees levied to fund staffing and facilities at the SFUSD schools and San Francisco Public Library branches. Funding for public facilities comes from a range of sources, including property taxes and development fees. Similar to the proposed project or the variant, the revised proposed project would contribute to public service funding through property taxes and development fees that would be proportionate to the increased demand in public services.

Therefore, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative impact related to public services.

### **Biological Resources**

The proposed project's impacts on biological resources are described and analyzed in Draft EIR Section 3.14, "Biological Resources," pp. 3.14-1 through 3.14-58. The Draft EIR concluded that the impacts of the proposed project on biological resources would be less than significant with mitigation.

---

<sup>27</sup> Hayes, Beverly, Branch Manager, Bayview Linda Brooks-Burton Branch Library, San Francisco, e-mail with Christine Wolfe of AECOM regarding ability of the Bayview Linda Brooks-Burton Branch Library and other branch libraries in the vicinity to accommodate the addition of residents associated with the revised proposed project, August 16, 2016.

<sup>28</sup> San Francisco Public Library, 2015, Reinvesting and Renewing for the 21<sup>st</sup> Century, <https://sfpl.org/pdf/about/commission/ReinvestingRenewing.pdf>, accessed June 25, 2018.

<sup>29</sup> Lambert, Michael, Acting City Librarian, San Francisco Public Library, San Francisco, e-mail with Elliott Schwimmer of AECOM regarding future library expansion and the ability of the public library system to accommodate the proposed project or variant.

The increase in residential units and decrease in commercial and educational/institutional space on the 700 Innes property under the revised proposed project would not involve changes to the building envelope analyzed for the proposed project in the Draft EIR. Implementation of the revised proposed project would provide the same open space and recreational amenities, construct the same new buildings, and demolish the same existing buildings as under the proposed project. Demolition of buildings that would affect tidal marshland, open water, wetlands, and vegetated areas could adversely affect wildlife and habitat.

Because construction of the revised proposed project would occur within the same building envelope as the proposed project with no change in recreational or open space amenities and no change in building height or bulk, the revised proposed project would result in the same biological resource impacts as analyzed in the Draft EIR for the proposed project.

The following mitigation measures described in the Draft EIR for the proposed project would also apply to the revised proposed project:

- Mitigation Measure M-BI-1a, “Prepare and Implement a Hydroacoustic Monitoring Program for Special-Status Fish and Marine Mammals”
- Mitigation Measure M-BI-1b, “Implement Avoidance and Minimization Measures for Special-Status Species”
- Mitigation Measure M-BI-1c, “Prepare and Implement a Vegetation Restoration Plan and Compensatory Mitigation”
- Mitigation Measure M-BI-1d, “Avoid Ridgway’s Rail Habitat During the Nesting Season”
- Mitigation Measure M-BI-1e, “Avoid Nests during Bird Nesting Season”

The revised proposed project’s impacts on biological resources would be less than significant with mitigation.

### ***Cumulative Impacts***

The Draft EIR concluded that cumulative impacts on biological resources would be less than significant due to the creation and enhancement of tidal marsh habitat planned for the India Basin Shoreline Park and India Basin Open Space properties, which would increase the quality of habitat at the project site, and would result in more suitable habitat for special-status species. The increase in residential units and decrease in commercial and educational/institutional space on the 700 Innes property under the revised proposed project would not involve changes to the building envelope previously analyzed for the proposed project in the Draft EIR. The building size—height, width, and length—would remain the same. In addition, the same habitat enhancements would occur under the revised proposed project and the proposed project. Therefore, like the cumulative impact conclusion in the Draft EIR, the revised proposed project, in combination with past, present, and reasonably foreseeable development projects, would result in a less-than-significant cumulative impact related to biological resources.

## Hydrology and Water Quality

Draft EIR Section 3.15, “Hydrology and Water Quality,” pp. 3.15-1 through 3.15-66, concluded that the proposed project would result in less-than-significant impacts related to flooding and inundation and that the impacts related to water quality standards, drainage/runoff, and stormwater would be less than significant with mitigation.

The revised proposed project would increase the number of residential units and reduce the amount of commercial and educational/institutional space on the 700 Innes property. However, the revised proposed project would occupy the same footprint/location and building size and would use the same construction methods, have the same construction and operation permitting requirements, and include the same water, wastewater, and stormwater infrastructure as the proposed project that was analyzed in the Draft EIR. Impervious surfaces at the project site for the revised proposed project would be the same as the proposed project, because the development footprint and the amount of open space would be the same. In addition, on-site stormwater pollutant loading would be similar under the revised proposed project, because the land uses would be essentially the same as those proposed under the proposed project. Therefore, impacts related to flooding and inundation, water quality standards, drainage/runoff, and stormwater would be the same for the revised proposed project as for the proposed project described in the Draft EIR.

Because construction and operation of the revised proposed project would occur within the same building, open space, and in-water uses envelope as the proposed project, the revised proposed project would result in construction-related and operational impacts identical to those analyzed in the Draft EIR for the proposed project.

The following mitigation measures described for the proposed project in the Draft EIR would also apply to the revised proposed project:

- Mitigation Measure M-HY-1a, “Monitor Turbidity During Construction”
- Mitigation Measure M-HY1b, “Implement Pile Removal Best Practices”
- Mitigation Measure M-HY-1c, “Use Clamshell Dredges”

The revised proposed project’s impacts related to hydrology and water quality would be less than significant with mitigation.

### *Cumulative Impacts*

The Draft EIR concluded that cumulative impacts on hydrology and water quality could be significant even though cumulative development projects would be required to follow regulations similar to those described for the proposed project, including regulations related to water quality, stormwater, wastewater, construction dewatering, and site-specific actions for projects within the 100-year flood zone to protect against increasing flood levels and placing people or structures at risk of flood flows. However, the Draft EIR concluded that implementation of the mitigation measures identified above would reduce the proposed project’s contribution to a significant cumulative impact to less-than-significant levels.

The increase in residential units and decrease in commercial and educational/institutional space on the 700 Innes property under the revised proposed project would not involve changes to the building envelope previously

analyzed for the proposed project in the Draft EIR. The building size—height, width, and length—would remain the same. Similar to the proposed project, the revised proposed project would be required to implement Mitigation Measures M-HY-1a, M-HY-1b, and M-HY-1c, which would avoid and minimize water quality impacts during construction of the revised proposed project. Therefore, similar to the proposed project, after mitigation the revised proposed project would not make a cumulatively considerable contribution to cumulative effects, and the impact would be less than significant with mitigation.

### **Hazards and Hazardous Materials**

The proposed project’s impacts on hazards and hazardous resources are described and analyzed in Draft EIR Section 3.16, “Hazards and Hazardous Materials,” pp. 3.16-1 through 3.16-70. The Draft EIR concluded that the impacts of the proposed project related to hazards and hazardous materials would be less than significant with mitigation.

The increase in residential units and decrease in commercial space and removal of school on the 700 Innes property under the revised proposed project would not involve changes to the building envelope previously analyzed in the Draft EIR for the proposed project. All of the building locations and dimensions remain the same. Like the proposed project, during construction the revised proposed project would disturb existing hazardous materials found in site building materials, soil, sediments, groundwater, and surface water. Construction of the revised proposed project could also result in disturbance of hazardous materials present in soil, shoreline sediments, and groundwater. Like the proposed project, the revised proposed project would also include implementation of a site remediation plan for the 700 Innes property before redevelopment of the property.<sup>30</sup> These site remediation plan–related activities could expose workers, visitors, or the public to hazardous materials found in building materials and in soil, sediment, groundwater, and surface water associated with this property. The project sponsors would construct and operate the revised proposed project in the same way as the proposed project analyzed in the Draft EIR. That is, the revised proposed project would be required to comply with the standard Maher Ordinance process for the portions of the project site properties above the mean high-water line. In addition, for any in-water construction activities, the revised proposed project would be subject to oversight by various agencies through the Clean Water Act Section 401 water quality certification, Clean Water Act Section 404 permit, River and Harbors Act Section 10 permit, and Bay Coastal Development Commission permit processes.

Because construction and operation of the revised proposed project would occur within the same building, open space, and in-water uses envelope as the proposed project, the revised proposed project would result in construction-related and operational impacts similar to those analyzed in the Draft EIR for the proposed project.

The following mitigation measures described in the Draft EIR for the proposed project would also apply to the revised proposed project:

- Mitigation Measure M-HZ-2a, “Prepare and Implement a Site Mitigation Plan for Areas Above the Mean High-Water Line”

---

<sup>30</sup> San Francisco Recreation and Parks Department, *Draft Remedial Action Plan. 900 Innes Avenue, San Francisco, California*, April 6, 2017. Prepared by Northgate Environmental Management.



- Mitigation Measure M-HZ-2b, “Prepare and Implement a Nearshore Sediment and Materials Management Plan for Areas Below the Mean High-Water Line”
- Mitigation Measure M-HZ-2c, “Prepare and Implement a Remedial Action Plan for the 900 Innes Property”

The revised proposed project’s impacts related to hazards and hazardous materials would be less than significant with mitigation.

### ***Cumulative Impacts***

The Draft EIR concluded that cumulative projects would have a less-than-significant impact related to the routine transport, use, and disposal of hazardous materials, emergency service access, and fire hazards, but would have a significant cumulative impact with respect to soil or groundwater contamination. However, the Draft EIR concluded that the proposed project’s contribution to a significant cumulative impact related to soil and groundwater contamination would be less than significant with implementation of Mitigation Measures M-HY-1a, M-HY-1b, M-HZ-2a, M-HZ-2b, and M-HZ-2c. The increase in residential units and decrease in commercial and educational/institutional space on the 700 Innes property under the revised proposed project would not involve changes to the building envelope previously analyzed for the proposed project in the Draft EIR. The building size—height, width, and length—would remain the same. Furthermore, the revised proposed project would similarly implement Mitigation Measures M-HY-1a, M-HY-1b, M-HZ-2a, M-HZ-2b, and M-HZ-2c, which would reduce the revised proposed project’s contribution to a significant cumulative impact related to soil and groundwater contamination to less-than-significant levels. Therefore, similar to the proposed project, after mitigation the revised proposed project would not result in a cumulatively considerable contribution to cumulative effects, and the impact would be less than significant with mitigation.

### **Alternatives to the Revised Proposed Project**

Compared to the proposed project, the revised proposed project would not result in any significant project-level or cumulative impacts that were not previously identified in the Draft EIR. For this reason, no new alternatives need to be analyzed. The findings in Draft EIR Chapter 4.0, “Alternatives,” remain valid and are applicable to the revised proposed project.

### **E. Overall Conclusion of the Potential Environmental Impacts of the Revised Proposed Project**

The revisions to the proposed project would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes substantially increase the severity of any impacts identified in the Draft EIR. The same mitigation measures identified in the Draft EIR for the proposed project would continue to be required to reduce or avoid the significant environmental impacts of the revised proposed project, except Improvement Measure I-TR-7, “Implement an Active Loading Management Plan,” and Mitigation Measure M-TR-8, “Implement Passenger Loading Strategies for the School,” which would not apply to the revised proposed project because of the elimination of the school. No new or modified measures would be required to mitigate the significant impacts identified for the proposed project in the Draft EIR. In addition, because no changes to the cumulative projects are proposed and the project-level impacts of the revised proposed project have been determined to be similar to the project-level impacts of the proposed project, cumulative

impacts of the revised proposed project would be similar to cumulative impacts of the proposed project for all topics analyzed in the Draft EIR. Therefore, references to the proposed project in this RTC document, including Chapter 5, “Draft EIR Revisions,” shall be interpreted to include and incorporate any changes proposed by the revised proposed project, unless otherwise noted.

### 3 PUBLIC AGENCIES, ORGANIZATIONS, AND INDIVIDUAL PERSONS COMMENTING ON THE DRAFT EIR

Public agencies, non-governmental organizations, and individual persons submitted written comments (letters and emails) on the proposed India Basin Mixed-Use Project Draft EIR, which the City received during the Draft EIR public comment period from September 14, 2017 to October 30 2017. In addition, the Planning Commission held a public hearing about the Draft EIR on October 19, 2017, and individual persons (some representing organizations) and Commissioners made oral comments at that hearing. Tables 3-1 through 3-3, below, list the commenters' names, along with the corresponding commenter codes used in Chapter 4, "Comments and Responses," to denote each set of comments, the comment format, and the comment date. This RTC document codes the comments in three categories:

- Written and verbal comments from public agencies are designated by an "A-" followed by the acronym of the agency's name.
- Written and verbal comments from organizations are designated by an "O-" followed by the acronym of the organization's name.
- Written and verbal comments from individual persons are designated by an "I-" followed by the commenter's last name.

**Table 3-1: Public Agencies that Provided Comments on the Draft EIR**

Commenter Code	Name of Agency that Provided Comments (name of person, title that signed letter/email or provided verbal comment)	Comment Format	Comment Date	Responses to Comments Codes
A-ABAG	Association of Bay Area Governments (Ben Botkin, San Francisco Bay/Water Trail Planner)	Letter	October 27, 2017	PD-1, PD-2, TR-1, BI-1, ME-1
A-HPC	Historic Preservation Commission (Andrew Wolfram, President)	Letter	October 16, 2017	CR-2
A-SFPC1	San Francisco Planning Commission (Rodney Fong, Commissioner)	Draft EIR Hearing Transcript	October 19, 2017	GC-2
A-SFPC2	San Francisco Planning Commission (Dennis Richards, Vice President)	Draft EIR Hearing Transcript	October 19, 2017	GC-2

**Table 3-2: Organizations that Provided Comments on the Draft EIR**

<b>Commenter Code</b>	<b>Name of Organization that Provided Comments (name of person, title that signed letter/email or provided verbal comment)</b>	<b>Comment Format</b>	<b>Comment Date</b>	<b>Responses to Comments Codes</b>
O-BHS	Bayview Historical Society (Dan Dodt, President)	Email	October 27, 2017	ME-3
O-BHPCA	Bayview Hunters Point Community Advocates (J. Michelle Pierce, Executive Director)	Letter	October 30, 2017	GC-6
O-FIC	Friends of Islas Creek (Robin Chiang, Volunteer Executive Director)	Letter	October 30, 2017	ME-3
O-GGAS/SC	Golden Gate Audubon Society and Sierra Club (Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club)	Letter and Email	October 30, 2017	BI-1, BI-2, BI-3, BI-4, BI-5
O-GA1	Green Action (Sheridan Noelani Enomoto)	Draft EIR Hearing Transcript	October 19, 2017	GC-1, AQ-1, PH-1, GC-1
O-GA2	Green Action (Bradley Angel, Executive Director)	Letter and Email	October 30, 2017	CR-3, PH-1, PH-4, TR-2, NO-1, AQ-1, GC-1, GG-1, UT-1, PS-1, HZ-1, HZ-2, HY-1, GC-5,
O-IBNA	India Basin Neighborhood Association (Sue Ellen Smith, Chair)	Letter	October 29, 2017	LU-1, LU-2, AE-2, PH-2, PH-4, TR-2, TR-3, TR-4, NO-1, NO-2, UT-1, UT-2, UT-3
O-ODL1	Open Door Legal (Onki Kwan, Director of Social Ventures Legal Services)	Letter	October 16, 2017	CR-1
O-ODL2	Open Door Legal (Onki Kwan, Director of Social Ventures Legal Services)	Draft EIR Hearing Transcript	October 19, 2017	CR-1
O-PBNA	Potrero Boosters Neighborhood Association (J.R. Eppler, President)	Letter	October 30, 2017	TR-2, TR-5
O-TG	Todco Group (John Elberling, President)	Letter	October 26, 2017	PH-4
O-TPL	Trust for Public Land (Philip Vitale)	Draft EIR Hearing Transcript	October 19, 2017	ME-1

**Table 3-3: Individual Persons Who Provided Comments on the Draft EIR**

<b>Commenter Code</b>	<b>Name of Person Who Provided Comments</b>	<b>Comment Format</b>	<b>Comment Date</b>	<b>Responses to Comments Codes</b>
I-Barshak	Barshak, Jackie	Email	October 26, 2017	PH-4, NO-2, AQ-2, HZ-3, ME-4, ME-5
I-Blank	Blank, Roxanne	Draft EIR Hearing Transcript	October 19, 2017	CR-1
I-Brodsky	Brodsky, Mikhail	Draft EIR Hearing Transcript	October 19, 2017	GC-2, GC-3
I-Crescibene	Crescibene, Chris	Email	October 29, 2017	AE-1, CR-1, GC-2
I-Fahey	Fahey, James	Draft EIR Hearing Transcript	October 19, 2017	AE-1
I-Flores	Flores, Jesus	Draft EIR Hearing Transcript	October 19, 2017	LU-2, AE-1, GC-2
I-Grossblatt	Grossblatt, David	Draft EIR Hearing Transcript	October 19, 2017	CR-1
I-Jennison	Jennison, Ellsworth	Draft EIR Hearing Transcript	October 19, 2017	HY-1, GC-4, ME-6, ME-7
I-Krishnaveni	Krishnaveni, Kris	Draft EIR Hearing Transcript	October 19, 2017	GC-2
I-Paul	Paul, Jeremy	Draft EIR Hearing Transcript	October 19, 2017	CR-1, GC-2
I-Rekovoff	Rekovoff, Vladimir	Draft EIR Hearing Transcript	October 19, 2017	ME-2
I-Ruggeroli	Ruggeroli, Dawn	Draft EIR Hearing Transcript	October 19, 2017	GC-2
I-Vaidya	Vaidya, Abhishek	Draft EIR Hearing Transcript	October 19, 2017	GC-2
I-VerPlanck	VerPlanck, Chris	Email	October 4, 2017	PD-3

This page intentionally left blank.

---

## 4 COMMENTS AND RESPONSES

---

This RTC document is organized by topic and contains responses to comments related to contents of the Draft EIR. Within each environmental topic, similar comments are grouped together under appropriate subject headings, which are generally based on the environmental topics analyzed in the Draft EIR. Environmental category codes or sections are as follows:

- A. Project Description
  - PD-1: Bay Trail Design and Features
  - PD-2: India Basin Shoreline Park Design and Features
  - PD-3: 702 Earl Street Building Design and Features
- B. Land Use and Land Use Planning
  - LU-1: Project Site Zoning and Proposed Building Heights
  - LU-2: Cumulative Land Use Impacts
- C. Aesthetics
  - AE-1: Effects to Views
  - AE-2: General Aesthetics
- D. Population and Housing
  - PH-1: Effects Related to Population Growth
  - PH-2: Transportation Network Effects Related to Housing
  - PH-3: Housing Affordability and Supply
  - PH-4: Cumulative Population and Housing
- E. Cultural Resources
  - CR-1: Banya Building Is Not a Historic Resource under CEQA
  - CR-2: Historic Resources CEQA Findings
  - CR-3: Archeological Resources CEQA Findings
- F. Transportation and Circulation
  - TR-1: Pedestrian and Bicyclist Access to the Bay Trail
  - TR-2: Vehicle Miles Traveled Methodology and Findings
  - TR-3: Transit Capacity Impacts
  - TR-4: Loading Impacts
  - TR-5: TNCs, CPHPS Data, and Mode Split Methodology
- G. Noise and Vibration
  - NO-1: Noise Impacts in the Vicinity
  - NO-2: Cumulative Noise Impacts
- H. Air Quality
  - AQ-1: Air Quality Findings
  - AQ-2: Exposure to Pollutant Concentrations

I. Greenhouse Gas Emissions

- GG-1: Greenhouse Gas Emissions Findings

J. Wind

- The comment and corresponding response related to the topic of wind, evaluated in Draft EIR Section 3.9, is discussed in Response AE-2.

K. Shadow

- The comment and corresponding response related to the topic of shadow, evaluated in Draft EIR Section 3.10, is discussed in Response GC-3.

L. Recreation

- RE-1: Project Design and Wildlife
- RE-2: Recreational Programming and Signage

M. Utilities and Service Systems

- UT-1: Sewage Treatment Plant Impact and Stormwater Plan
- UT-2: Water Supply
- UT-3: Electrical Infrastructure

N. Public Services

- PS-1: Demand for Public Services

O. Biological Resources

- BI-1: Shorebird and Migratory Bird Impacts
- BI-2: Bird Safe Building Guidelines
- BI-3: Nesting Bird Impacts
- BI-4: Plantings at the Project Site
- BI-5: Wetlands Impacts
- BI-6: Cumulative Biological Impacts

P. Hydrology and Water Quality

- HY-1: Effects of Sea Level Rise

Q. Hazards and Hazardous Materials

- HZ-1: Potential Effects of Site Contamination
- HZ-2: Proximity of Nearby Historically Contaminated Sites
- HZ-3: Leaking Underground Storage Tanks

R. Alternatives

- The comment and corresponding response related to the topic of alternatives, evaluated in Draft EIR Chapter 4.0, is discussed in Response ME-1.

S. General Environmental Comments

- GC-1: Language Access during CEQA Process
- GC-2: Addressing the Banya Building in the EIR
- GC-3: Public Review Period during CEQA Process
- GC-4: EIR Funding



- GC-5: Adequacy of the EIR
- GC-6: Endorsement of Another Public Comment

#### T. Merits of the Project

- ME-1: Support of the Proposed Project and Variant Design and Community Input
- ME-2: Preference for the EIR No Project Alternative
- ME-3: Preference for the EIR Full Preservation Alternative
- ME-4: Preference for a 100 Percent Affordable Housing Alternative
- ME-5: Funding Sources
- ME-6: Preference for a 100 Percent Open Space/Park Use Alternative
- ME-7: Preference for Additional Open Space/Park Uses on Adjacent Land

### A. Project Description

The comments and corresponding response in this section relate to the Project Description, presented in Chapter 2.0 of the Draft EIR. The comments are further grouped according to the following issues:

- PD-1: Bay Trail Design and Features
- PD-2: India Basin Shoreline Park Design and Features
- PD-3: 702 Earl Street Building Design and Features

#### COMMENT PD-1: BAY TRAIL DESIGN AND FEATURES

- **A-ABAG-1**

“Background

The Bay Trail is a planned 500-mile walking and cycling trail around the entire San Francisco Bay, running through all nine Bay Area counties and 47 cities. 354 miles are complete and in use today. Two main goals of the Bay Trail Project are to locate the trail as close as possible to the shoreline, and to provide a fully separated, multi-use bicycle/pedestrian facility. The Bay Trail in San Francisco is 30 miles long, with 17 miles complete. The majority of the incomplete segments are located south of the Oakland-San Francisco Bay Bridge. The redevelopment of India Basin represents a phenomenal opportunity to provide these historically park/open space-poor neighborhoods with high-quality waterfront access, and we are excited to welcome these new segments into the regional San Francisco Bay Trail.

The San Francisco Bay Area Water Trail is a multi-agency program currently being implemented by the Coastal Conservancy with project partners at the Association of Bay Area Governments (ABAG), the San Francisco Bay Conservation and Development Commission (BCDC) and the State Division of Boating and Waterways, as well as an advisory committee representing a broad range of interests and expertise. The focus of the program is to enhance public access around the Bay for non-motorized small boats (such as kayaks, sailboards, outriggers, and stand up paddleboards), and encourage and enable people to explore the Bay in different boat types and in a variety of settings through single- and multi-day trips.

## Plans and Policies

The Draft EIR references the ABAG Bay Trail Plan and its policies, and assesses how the proposed development will address each relevant topic. The Project as described appears to be generally consistent with Bay Trail Plan guidance, however, the Bay Trail Design Guidelines (available at [www.baytrail.org](http://www.baytrail.org)) state that the minimum recommended pathway width is 12' with 3' shoulders on either side, thus bringing the total width to 18'. The Draft EIR text and figures show only a 12' width. It is unclear if shoulders are incorporated into this dimension. Please illustrate the width of the shoulders in the FEIR, and also provide info regarding proposed trail surfacing.” (Ben Botkin, *San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Letter, October 27, 2017 [A-ABAG-1]*)

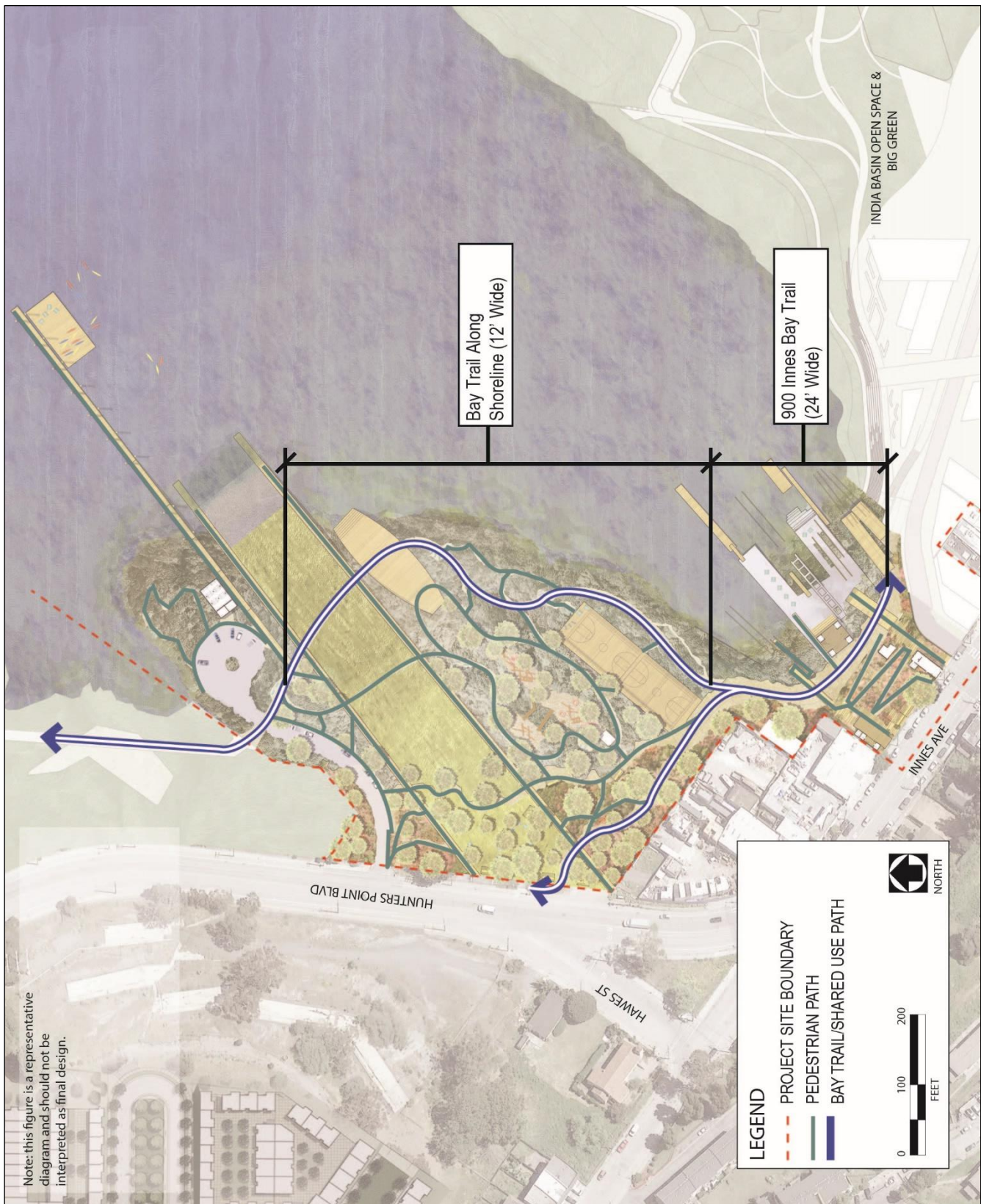
### **RESPONSE PD-1**

This comment requests more information regarding the proposed width of the Bay Trail, and states that the Bay Trail should be at least 12 feet in width with 3-foot shoulders on either side to be consistent with the Bay Trail Design Guidelines. The project site is unique in shape and landform in a manner that limits the ability to have consistent trail widths in some locations. The dimensions specified in the San Francisco Bay Trail Design Guidelines and Toolkit tend to focus on waterfront sites around the Bay where the Bay Trail is the only shoreline access path and, therefore, must accommodate all projected volumes of pedestrians and bikes. The project site, however, provides many different forms of shoreline access, including narrow trails, wide sidewalks, shared public ways, and the proposed two-way, 12-foot-wide Class 1 commuter bike lane. Based on the numerous pathways through the site, the 12-foot- to 24-foot-wide path range is generally consistent with the recommended Bay Trail width. However, due to the project site's unique shape and landform, the proposed project and variant would not include separate 3-foot shoulders for the Bay Trail and would not, therefore, strictly comply with the recommended design standards in the San Francisco Bay Trail Design Guidelines and Toolkit. The Bay Trail would only be at its minimum width of 12 feet for approximately 200-foot-long sections before meeting another turnout, amenity zone, intersecting trail, or destination where it widens to 20 feet. Although the project would not be consistent with the recommended width of 12 feet with 3-foot shoulders on either side in all areas of the Blue Greenway/Bay Trail, the project would include many different forms of shoreline access to parallel and supplement the Bay Trail, including sidewalks and paved paths, hiking trails, a shoreline boardwalk, and shared public ways. These alternative facilities would provide additional capacity and redundancy to handle projected bicycle and pedestrian activity along and parallel to the Bay Trail and would perform functions similar to the recommended 3-foot shoulders in locations where the project only proposes to provide 12 feet.

In response to this comment, the width of the Bay Trail within and throughout the project site has been clarified in the Draft EIR Project Description, and is shown in new Figures 4-1 and 4-2 below. This information is provided for clarification purposes and does not change the analysis or findings in the Draft EIR.

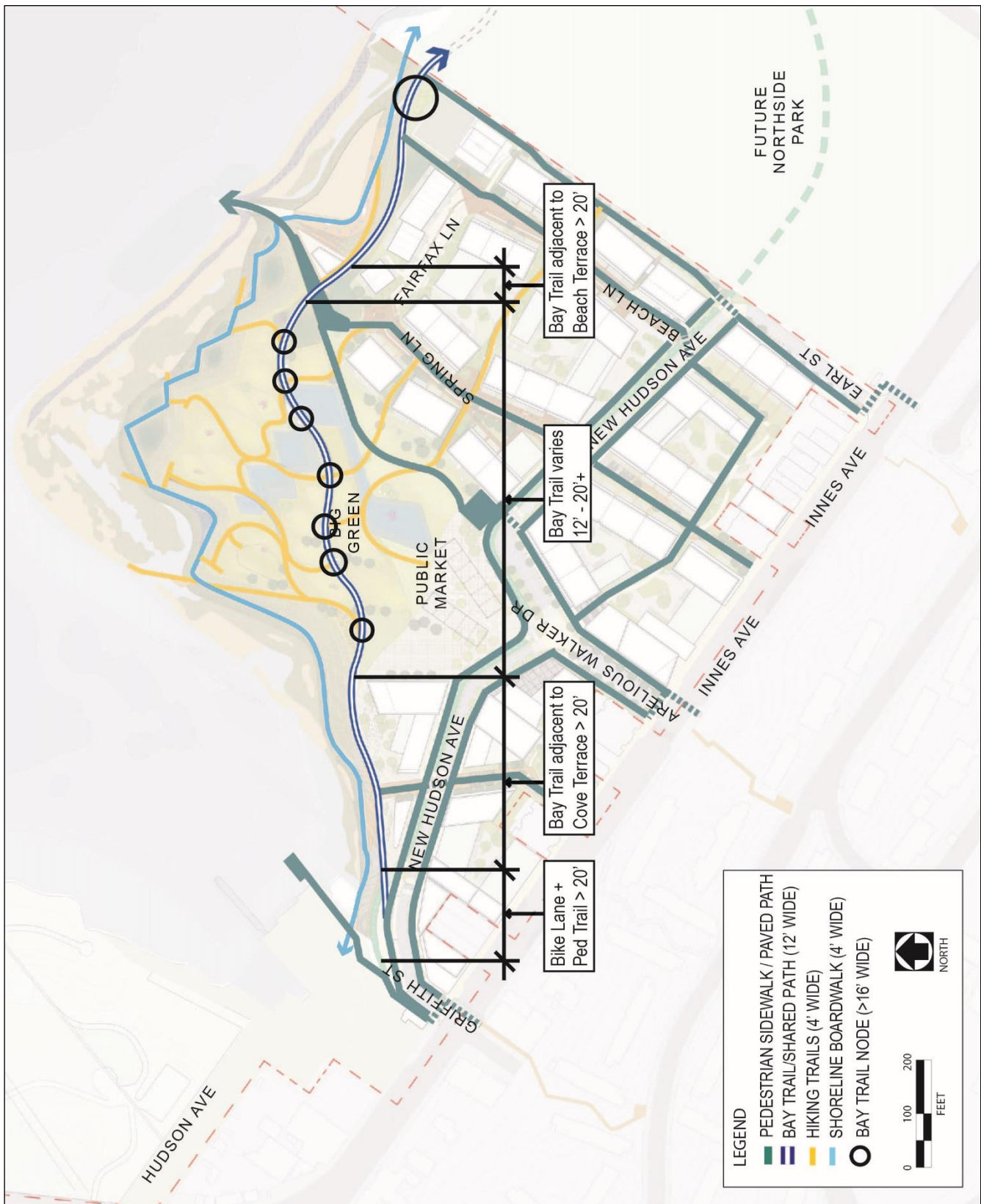
The first full paragraph on EIR p. 2-29 has been revised with the following sentence:

The 5.6-acre India Basin Shoreline Park property would be redesigned to serve the surrounding community and enhance citywide program offerings. The Blue Greenway/Bay Trail and a Class 1 bikeway would continue through this park. The Blue Greenway/Bay Trail would be between 12 feet wide and 24 feet wide throughout the properties and would connect seamlessly to the existing Blue Greenway/Bay Trail.



Source: GGN, 2017; Adapted by AECOM in 2017

**Figure 4-1: Proposed Bay Trail Width on the India Basin Shoreline Park and 900 Innes Properties**



Source: SOM, 2017; Adapted by AECOM in 2017

**Figure 4-2: Proposed Bay Trail Width on the India Basin Open Space and 700 Innes Properties**

In the portions of the Blue Greenway/Bay Trail that would be a minimum of 12 feet wide, the trail would not include shoulders. Pedestrian, bicycle, and vehicular access to the shoreline would be enhanced (Figure 2-4a). Potential project elements for this property include improved and upgraded playground and recreational facilities including two basketball courts; restrooms; additional trees; interpretive exhibits explaining the history of the India Basin Scow Schooner Boatyard, including the remains of the various ship hulls located within the confines of the India Basin Shoreline Park; improved lawn areas; a promenade; event areas; a water feature; barbeque pits; drinking fountains; a pier and dock with human-powered boat launch ramp, art installations, fishing areas, and lighting; and an exercise or cross-training course. The existing surface parking, vehicular access, and drop-off and loading zones also may be improved. In addition, 0.64 acre of tidal marsh and wetlands would be created along the shoreline.

The second full paragraph on EIR p. 2-29 has been revised, as follows:

The 900 Innes property would be developed as a waterfront park providing a connection between India Basin Shoreline Park and the India Basin Open Space. This park also would provide a connection for the 24-foot-wide Blue Greenway/Bay Trail, the Class 1 bikeway, and pedestrian and bicycle access to the shoreline. Other potential project elements for this property include piers, fishing areas, plazas, event areas, tidal marshes, facilities for concessions, drinking fountains, restrooms, passive recreational areas for picnicking, shade structures, bicycle parking, wayfinding signage, and historical and educational displays.

## **COMMENT PD-2: INDIA BASIN SHORELINE PARK DESIGN AND FEATURES**

- **A-ABAG-2**
- **A-ABAG-8**

“The DEIR also references the San Francisco Bay Area Water Trail Plan. The Water Trail Plan identifies India Basin as a High Opportunity Site. The boat launch facilities proposed for the Project are designed consistent with those encouraged by the Water Trail Plan, including provision of an accessible launch, storage, outfitter/programs, restrooms, parking, and loading/unloading zone. If feasible, the Water Trail encourages inclusion of boat washdown facilities to help prevent the spread of invasive species as well as allowing boaters to rinse off following a paddle.” (*Ben Botkin, San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Letter, October 27, 2017 [A-ABAG-2]*)

“The project inclusion of an outfitter building as well as RPD boating programs offers an important opportunity to provide interpretive education and hands-on learning opportunities to enhance community understanding of the important Bay species and habitat and how to minimize disturbance to these resources. The State Coastal Conservancy notes that ‘encouraging public access that includes learning about ecosystems is the best way to create a community of coastal stewards.’ While not required for mitigation, the Water Trail encourages RPD and outfitters to coordinate with the Water Trail Program, Heron’s Head EcoCenter, and other appropriate partners to develop interpretive curriculum and signage that fosters appreciation for wildlife and appropriate paddling

etiquette.” (Ben Botkin, *San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Letter, October 27, 2017 [A-ABAG-8]*)

## **RESPONSE PD-2**

The comment acknowledges that a boat launch facility is proposed and is consistent with the Water Trail Plan. The comment suggests that a washdown facility be included as part of the India Basin Shoreline Park under both the proposed project and the variant. The comment also agrees that the proposed project and variant’s inclusion of the outfitter building and boating programs would provide interpretive education and learning opportunities and would encourage coordination with the Water Trail Program and Heron’s Head Eco Center and other partners to foster appreciation of wildlife and boating.

The final design of the India Basin Shoreline Park is still being refined and has not yet determined if a washdown facility will be included. As described in Draft EIR Chapter 2.0, “Project Description,” on p. 2-38, “An outfitter building, located on land adjacent to the pier, would provide storage for kayaks, canoes, and life jackets; a kayak and canoe rental service; and office space to operate RPD programming. Members of the public would launch their own boats as well as the rental kayaks and canoes, and covered areas for shelter would provide space for birders, outdoor classes, and picnicking.” A variety of interpretive exhibits would be provided on the Shoreline Park and 900 Innes sites including one that explains the history of the India Basin Scow Schooner Boatyard and the remains of ship hulls. See Draft EIR Section 3.4, “Cultural Resources,” pp. 3.4-50 and 3.4-51, including Mitigation Measure M-CR-1c, “Develop and Implement an Interpretative Plan,” on p. 3.4-50, which will require an interpretive program that includes, but is not limited to, installation of permanent on-site interpretive displays or screens in publicly accessible locations and coordination with other interpretative displays currently proposed along the Bay. The Draft EIR includes San Francisco Bay Plan Policies 3, 4 and 5 in Section 3.11, “Recreation,” on pp. 3.11-5–3.11-8 of the San Francisco Bay Plan that reference recreation and waterfront concepts that could be included in proposed project or variant. Several recreational opportunities are provided throughout the project site and would include signage for wayfinding, safety and interpretive information. The Draft EIR lists RPD objectives related to History & Cultural and Recreation & Education in Chapter 2.0, “Project Description,” on pp. 2-13 and 2-14 that include a number for programming opportunities to educate and allow for appreciation of wildlife. To the extent this comment pertains to invasive species, pp. 3.14-34–3.14-35 of the Draft EIR includes Mitigation Measure M-BI-1c, “Prepare and Implement a Vegetation Restoration Plan and Compensatory Mitigation,” which would be implemented to reduce the potential for the invasive species to spread. These comments do not raise specific issues related to the adequacy, accuracy, or completeness of the analysis of physical environmental impacts presented in the Draft EIR.

## **COMMENT PD-3: 702 EARL STREET BUILDING PARK DESIGN AND FEATURES**

- **I-Verplanck-1**

“I understand the normal process for submitting comments to Planning by the deadlines you provided, but my client is also a stakeholder in the project. It’s Michael Hamman, the owner of 702 Earl. Basically, he is concerned about a couple relatively minor changes made to the project description that were inserted by Page & Turnbull into their HRE [Historic Resources Evaluation] without his prior approval. However, the changes are only mentioned in the HRE and the plans that are attached to the DEIR but they aren’t actually included in the text of the DEIR.

The main point of disagreement involves the elevator tower. Michael wants it to be set at an angle to his house and to have a shed roof. P&T unilaterally revised its HRE without consulting with Michael to say that the elevator tower will be built at a right angle to the house and that it will have a flat roof. There are a couple of other minor issues involving cladding and fenestration, but the project description in the DEIR is pretty general in most counts and does not even mention the orientation or roof form of the elevator tower.

Anyhow, now that you have this background, I have two questions:

1. As a stakeholder in the project can Michael submit comments to you on the adequacy of the DEIR? If so, great, but Build Inc. is concerned that a stakeholder challenging the DEIR could “upset the apple cart,” as it were. Michael doesn’t want to do that but he also wants his part of the project to be built according to his original intention.
2. Does the text of the DEIR take precedence over the items in the Appendix? And if so, would Michael have a chance to tweak the design at the end of the process when he submits for permits for his part of the project or do you think that he needs to do it now to avoid setting the design “in stone?” (*Chris Verplanck, Individual, Verplanck, Email, October 4, 2017 [I-Verplanck-1]*)

### RESPONSE PD-3

This comment addresses the proposed physical alterations to the existing building at 702 Earl Street and asks whether a project stakeholder may submit comments on the Draft EIR. A project stakeholder, like any member of the public, may submit comments on the Draft EIR. Relocation of the existing building at 702 Earl Street is part of the revised proposed project, proposed project, and variant, but it is under, and would continue to be under, the separate ownership of Michael Hamman (i.e., a project stakeholder). The building at 702 Earl Street is an identified historic resource under CEQA. As part of the proposed project or variant, the building would be relocated within the project site and undergo some physical alterations. After BUILD and Michael Hamman reached an agreement on the nature of the proposed physical alterations, some modifications were made to address design review comments from the Planning Department and are included as an appendix to the HRE (EIR Appendix C). These modifications were not forwarded to Michael Hamman for his review prior to publication of the Draft EIR.

This comment asks whether the proposed physical alterations to 702 Earl Street that are presented in the HRE can be modified to more closely align with Michael Hamman’s original intention. In response to this request, the Planning Department met with BUILD, Michael Hamman and his representatives, and Page & Turnbull in November 2017. Michael Hamman and his representatives submitted plans showing the desired design modifications in December 2017. The Planning Department reviewed this proposal and determined that the desired design modifications, like the previously proposed alterations analyzed in the HRE and the Draft EIR, would result in less-than-significant impacts with mitigation on 702 Earl Street.<sup>31</sup> The details of the previously proposed alterations were only included in the HRE. Similarly, the details of the desired design modifications are only included in the Planning Department’s memorandum mentioned above. Therefore, no changes to the EIR are required in response to this comment.

<sup>31</sup> Vanderslice, Allison, San Francisco Planning Department, memorandum to Michael Li regarding 702 Earl Street Revised Plans – India Basin Mixed-Use Project (Case 2014-002541ENV), January 23, 2018.

All information in the EIR, whether contained in the text of the EIR or in an EIR appendix (e.g., the NOP/Initial Study or a technical background study), carries equal weight.

## **B. Land Use and Land Use Planning**

The comments and corresponding responses in this section relate to the topic of Land Use and Land Use Planning, evaluated in Draft EIR Section 3.1. The comments are further grouped according to the following issues:

- LU-1: Project Site Zoning and Proposed Building Heights
- LU-2: Cumulative Land Use Impacts

### **COMMENT LU-1: PROJECT SITE ZONING AND PROPOSED BUILDING HEIGHTS**

- **O-IBNA-4**

“3.1 Land Use and Land Use Planning

Impact LU-2: The proposed project or variant would not result in conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted/or the purpose of avoiding or mitigating an environmental effect. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact LU-2 would have a less than significant CEQA impact. Table 2-3 & 2-3: There is no variant for 14-story buildings; that is, nothing else is proposed but the 14 stories. Current zoning allows for 4 stories at this site, and although this project seeks to change that, what is proposed for this project does not offer a variant of anything less than 14 stories. Yet, there is an inconsistency in the DEIR, as Table 3 -Proposed Build Inc. Development lists “Height: up to 120’ (not 160”) = 11 stories.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-4]*)

### **RESPONSE LU-1**

The comment expresses concern regarding project site zoning and proposed building heights. Table 2-3, “Summary of Proposed Project and Variant Components,” on p. 2-15 of the Draft EIR in Chapter 2.0, “Project Description,” is correct and indicates the building heights (and number of floors) as 160 feet (14 floors) for both the proposed project and variant. The Draft EIR does not contain a Table 3 or another table stating that the proposed height would be up to 120 feet as stated in the comment.

The project site is located in a 40-X and Open Space (OS) height and bulk districts. The existing designation would limit the proposed project and the variant to a 40-foot height limit with no bulk restriction. The EIR Code Compliant Alternative that limits the building height throughout the project site to 40 feet (4 stories) was also evaluated in Draft EIR Chapter 4.0, “Alternatives.” The Code Compliant Alternative would require a larger footprint spread out over more of the project site to achieve a similar overall square footage as the proposed project or variant resulting in less available space for outdoor recreational/open space amenities. A summary of these potential Code Compliant Alternative impacts compared to the proposed project and variant is provided in Draft EIR Chapter 4.0, “Alternatives,” and Table 4-2 on p. 4-5. Therefore, as stated in the Draft EIR, the Code



Compliant Alternative would have greater impacts on transportation and circulation, air quality, utilities and service systems, biological resources, and recreation compared to the proposed project or variant.

The proposed project and variant designs contain buildings ranging from one to 14 stories (20–160 feet tall). As stated on p. 2-21 in the Draft EIR Chapter 2.0, “Project Description,” the proposed project or variant would require rezoning the properties from Public (P), Small-Scale Neighborhood Commercial (NC-2), Light Industrial (M-1), and Heavy Industrial (M-2) into a special use district (SUD) with specific height, bulk, and use designations appropriate for the proposed development, through amendments to the General Plan, Planning Code text, and the Zoning Map. The details of the use districts are discussed starting on Draft EIR Section 3.1, “Land Use,” on p. 3.1-12. The existing zoning is identified in Draft EIR Figure 3.1-1. The design of the individual buildings would require the proposed project or variant to follow design review procedures. It was concluded under Impact LU-2 on Draft EIR pp. 3.1-19–3.1-20 that impacts related to a conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect would be less than significant, given that the project sponsors propose to seek amendments to current zoning, the General Plan, the Bay Plan, and San Francisco Waterfront Special Area Plan to bring these plans and the project into conformity. These comments do not raise specific issues that address the adequacy, accuracy, or completeness of the analysis presented in the Draft EIR.

#### **COMMENT LU-2: CUMULATIVE LAND USE IMPACTS**

- **I-Flores-2**
- **O-IBNA-5**

“But also you have to take into consideration the height -- height restrictions that are currently imposed, which is Zone M-1 and an NC-2 which offer 40 foot height. I would not recommend switching the current zoning to a special-use district because it can impede the views. And under the California Environmental Quality Act, the -- California requires that the State take all action necessary to provide the people of the state with the enjoyment of an aesthetic, natural scenic, and historic environment.” (*Jesus Flores, Facilities Manager, Archimedes Banya, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Flores-2]*)

“Impact C-LU-1: The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not result in significant cumulative impacts related to land use and land use planning. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact C-LU-1 would have a less than significant CEQA impact.

The DEIR does not address the impending PG&E [Pacific Gas & Electric] development on their former Hunter’s Point power plant location. While no plans are yet available, it is well known that PG&E is actively developing plans for this site, and this DEIR should address the likely increase in population, traffic, noise, etc.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-5]*)

## RESPONSE LU-2

The comments assert that the Draft EIR needs to take into consideration the height restrictions that are currently imposed on the site and that the Draft EIR does not consider all of the reasonably foreseeable projects in the cumulative land use analysis.

As indicated by the comment, the proposed project or variant would require rezoning into a SUD with specific height, bulk, and use designations appropriate for the proposed development, through amendments to the San Francisco General Plan, Planning Code text, and Zoning Map. See Response LU-1 for a discussion of zoning and building height restrictions, including the existing 40-foot height limit.

As stated in Draft EIR Chapter 2.0, “Project Description,” on pp. 2-21–2-22, the proposed uses on the 700 Innes property—where the two 14-story buildings would be located—would require rezoning into a SUD with specific height, bulk, and use designations appropriate for the proposed development, through amendments to the General Plan, Planning Code text, and the Zoning Map. As stated on p. 1-1 in Draft EIR Chapter 1.0, “Introduction,” and later on p. 2-73 of the Draft EIR Chapter 2.0, “Project Description,” this action would be subject to approval by the San Francisco Board of Supervisors.

The comment expresses concern that with the proposed project views would be impeded. Views from several publicly accessible viewpoints were analyzed in Draft EIR Section 3.2, “Aesthetics.” Impact AE-1 on Draft EIR pp. 3.2-25–3.1-45 discusses and concludes with visual and textual analyses that impacts related to effects on scenic vistas or resources would be less than significant, given that there are numerous views that can be taken from other vantage points that allow viewers to get views of such scenic resources. For additional information related to aesthetics, see response AE-1: Effects to Views, on pp. 5-14 – 5-16.

The comment states that under CEQA, action should be taken to provide people with the enjoyment of an aesthetic, natural, scenic, and historic environment. Development of the project site would provide more opportunities for the public enjoyment along the Bay including through provision of additional coastal views, enhancement of natural wetlands, preservation of historic resources, and provision of new recreational opportunities that would enhance the aesthetic of the existing setting and allow for more public access opportunities. For additional detail regarding the aesthetic, natural scenic, and historic environment see the Draft EIR that discusses the existing and anticipated future environment related to these topics under Section 3.2, “Aesthetics”; Section 3.11, “Recreation”; Section 3.14, “Biological Resources”; and Section 3.4, “Cultural Resources.”

The comment states that the cumulative land use analysis in the Draft EIR does not take into account the proposed development on the adjacent PG&E site. The Draft EIR lists the cumulative projects considered in the various EIR cumulative analyses, including the PG&E Hunters Point Shoreline Area project, as indicated in the cumulative projects list in Draft EIR Table 3-1 on p. 3-7 of Chapter 3.0, “Environmental Setting and Impacts.” As indicated by the comment, the future specific uses of the PG&E property are not yet determined and no application has been submitted to the Planning Department for the PG&E Hunters Point Shoreline Area project. The cumulative analysis in the EIR employs information and assumptions about the anticipated PG&E Hunters Point Shoreline Area project that were reasonably available at the time of publication of the Draft EIR. CEQA Guidelines Section 15130(b) provides that the analysis of cumulative impacts should be guided by the standards of practicality and reasonableness. The cumulative analyses prepared for the EIR are based on a reasonable

projection of likely development in the vicinity, including the information available at the time of analysis about the PG&E Hunters Point Shoreline Area project. Furthermore, there is no substantial evidence in the record that the proposed project or variant would make a cumulatively considerable contribution to a new significant cumulative impact that was not addressed in the EIR. Therefore, including specific details related to population, traffic, and noise impacts for this cumulative project would be speculative, and CEQA discourages public agencies from engaging in speculation. PG&E has been evaluating soil cleanup options to address future uses of the PG&E Hunters Point Shoreline Area project site, and cleanup of groundwater contamination is already in progress. In addition, the project sponsors have been coordinating with FivePoint (developer for the Hunters Point Shipyard Phase I and Candlestick Point–Hunters Point Shipyard [CPHPS] projects), SFMTA, San Francisco County Transportation Authority, San Francisco Public Works (SFPW), San Francisco Planning Department, Office of Community Investment and Infrastructure, Office of Workforce and Economic Development, Trust for Public Land, Gehl Studio, Fehr & Peers, and PG&E to create the India Basin Transportation Action Plan (IBTAP). The IBTAP involves reconfiguring and improving the streets and streetscapes on site and in the immediate vicinity of the project site. Improvements identified in the IBTAP relevant to the proposed project and variant that were specifically proposed for implementation along portions of Innes Avenue adjacent to the project site have been included in the Draft EIR (see p. 2-44 of Draft EIR Chapter 2.0, “Project Description”) and were analyzed in the Draft EIR.

Furthermore, see Draft EIR Section 3.3, “Population and Housing,” pp. 3.3-12 and 3.3-14, Section 3.5, “Transportation and Circulation,” pp. 3.5-81- 3.5-99, and Section 3.6, “Noise,” pp. 3.6-40- 3.6-46 for cumulative population, traffic, and noise analyses of the proposed project and variant in conjunction with other cumulative projects, including the PG&E Hunters Point Shoreline Area project. The project sponsors and the San Francisco Planning Department will continue to coordinate with PG&E as their plans are further determined. Therefore, the Draft EIR adequately analyzed the cumulative land use impacts of the proposed project with other past, present, and reasonably foreseeable projects.

### **C. Aesthetics**

The comment and corresponding response in this section relate to the topic of Aesthetics, evaluated in Draft EIR Section 3.2. The comments are further grouped according to the following issues:

- AE-1: Effects to Views
- AE-2: General Aesthetic Impacts

#### **COMMENT AE-1: EFFECTS TO VIEWS**

- **I-Flores-3**
- **I-Fahey-1**
- **I-Crescibene-2**

“So I ask that you take into consideration in putting Archimedes Banya into the report. Because you also have pictures of Key Viewpoints, specifically Number 9 and Number 6 in the document, which show the street, and it is not accurate to tell how customers we have who come to our facilities. That street in your Key Viewpoints only show about five to six cars, when on a daily basis we have about a hundred. We have various people coming to

our facility, and they take the time to relax and enjoy themselves there. So I strongly urge you to include us into the report as well. Thank you.” (*Jesus Flores, Facilities Manager, Archimedes Banya, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Flores-3]*)

---

“MR. FAHEY: Hi. My name is James Fahey, and I am a resident of Bayview. I use the Banya a lot. I’d just like to say Figure 3.2.1 does not represent key viewpoints that should be considered. Please reconsider that.

The current project is an eyesore. It’s going to block very key views. It’s a very bad idea. Thank you.” (*James Fahey, Neighbor, Draft EIR Hearing Transcript, October 19, 2017 [I-Fahey-1]*)

---

“The 1,000-page draft EIR for the project doesn’t even acknowledge the Banya’s existence. Renderings in the document (particularly Figure 3.2-12) show the Banya being surrounded by taller buildings, which would obviously affect a facility that depends on proper ventilation for the parilka and is popular for its rooftop sundeck. Views from the sundeck that customers enjoy would be destroyed.” (*Chris Crescibene, Individual, Crescibene, Email, October 29, 2017 [I-Crescibene-2]*)

## **RESPONSE AE-1**

The comment requests that the EIR mention the Banya building. This comment also states that Figure 3.2-1 on p. 3.2-8 in Draft EIR Section 3.2, “Aesthetics,” does not represent key viewpoints that should be considered in the EIR, that the project is an eyesore, that it will block very key views, and that the project is a bad idea. The comment also suggests that Key Viewpoints 6 and 9 do not accurately reflect the size of the Banya’s customer base.

Although the Draft EIR did not explicitly identify the Banya business, the Banya site was analyzed. The Banya was considered as an off-site sensitive receptor in the air quality and noise analysis and the mass of the building was considered in the shadow and wind analysis in addition to other topics in the Draft EIR.<sup>32</sup> See Response GC-4 for further discussion regarding how the Banya was addressed in the Draft EIR. Text changes have been made to p. 2-4 in Draft EIR Chapter 2.0, “Project Description,” as well as p. 3.2-17 in Section 3.2, “Aesthetics,” to include a description of the Banya as an important business of the project area. This information is provided for clarification purposes and does not change the analysis or findings in the Draft EIR. The proposed project or variant would not displace the Banya business.

The locations of key viewpoints shown in Figure 3.2-1 were determined by the Planning Department and are adequate for the reasons discussed below. As with all CEQA impacts, the effects of a project must be considered in the physical context of the project site and compared with existing conditions. A proposed project would be considered to have a significant adverse effect on visual quality under CEQA if it were to have an adverse effect on a scenic vista, damage scenic resources, degrade the existing visual character or quality of the site, or create a

---

<sup>32</sup> Sensitive receptors are locations or areas where frequent human use occurs. Sensitive receptors include, but are not limited to, dwelling units, hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.

new source of substantial light and glare, as outlined in the significance thresholds in the Draft EIR, Section 3.2, “Aesthetics,” p. 3.2-24. The project site was photographed from a range of publicly accessible vantage points based on the following criteria: proximity to the proposed project and the variant; public accessibility; views of scenic resources; and ability to illustrate the visual character of the neighborhood. Using these criteria, the Planning Department determined that the nine key viewpoints analyzed in Draft EIR, Section 3.2, “Aesthetics,” were the most suitable locations for disclosing the visual changes that could be expected from implementation of the proposed project or the variant. Viewpoints from a private property are not publically accessible and, thus, are not considered in a CEQA visual analysis. The commenter does not suggest a new or different key viewpoint that should be analyzed. As explained on pp. 3.2-25–3.2-45 of the Draft EIR, impacts on these scenic vistas were concluded to be less than significant. Although some views would be obstructed by the proposed project and variant, particularly of the downtown San Francisco skyline (Key Viewpoint [KVP] 1 shown on p. 3.2-28 and KVP 8 shown on p. 3.2-43), other views of scenic resources such as the SF Port cranes, Heron’s Head Park, and Yerba Buena Island (KVP 1 on p. 3.2-28, KVP 2 on p. 3.2-30, KVP 3 on p. 3.2-32, and KVP 8 on p. 3.2-43) out toward the Bay—a dominant viewing direction—would still be available. Thus, viewers could geographically orient themselves based on long-range views of the available scenic resources in the project area.

KVPs 6 and 9, shown on pp. 3.2-14 and 3.2-10 of the Draft EIR, Section 3.2, “Aesthetics,” are photos taken during the daytime on weekdays from public vantage points along Innes Avenue. An aesthetics analysis under CEQA examines a project’s impacts to scenic vistas, scenic resources, existing visual character or quality, and light and glare. CEQA, as it is applied in San Francisco, does not require private views to be analyzed, nor does it require key viewpoint photographs to be taken with consideration of the size of customer bases of nearby businesses, such as the Banya. Therefore, no additional analysis is required. However, the first paragraph on Draft EIR p. 3.2-17 has been revised, as shown below, to clarify that the Banya building was included in the Draft EIR analysis. These revisions do not change any of the analyses or conclusions of the EIR.

### **Key Viewpoint 9**

KVP 9 (Figure 3.2-10) faces north toward the project site from the southern side of Innes Avenue at its intersection with Earl Street. This viewpoint offers typical views that a motorist would encounter while traveling west or east along Innes Avenue. Existing northwesterly views toward the project site are dominated by two vehicle lanes in each direction, one- to three-story buildings, overhead power lines, street trees, and parked cars. The buildings along Innes Avenue are varied in height and scale, ranging from approximately 12 to 50 feet tall. The Banya building at 748 Innes Avenue, which includes residential uses as well as a spa and communal bathing facility, is a four-story building with a cream and red-colored facade that is visible in the middle-ground from this vantage point. Overhead utility wires combined with the inconsistent building heights along Innes Avenue combine to create a weak sense of horizontal trending lines. Although the viewpoint faces Heron’s Head Park and the Bay, intervening development obstructs views of the water and the project site.

Although some taller buildings from the proposed project or variant would be located adjacent to the Banya building and would create a shadow for a limited time during the day which could impact the amount of sun that reaches the sundeck, shadows cast on private open spaces are not regulated in the City and County of San Francisco. See Draft EIR Section 3.10, “Shadow,” including shadow diagrams in Figures 3.10-2 through 3.10-14

that show how new shadow would reach the Banya building. The taller buildings proposed as part of the project would not impact ventilation because there would be no new structure that would block the top or back of the Banya because building setbacks would be required. In addition, the new proposed project and variant buildings that would be closest to the Banya building would be approximately 10–15 feet higher, which would not affect the ventilation. As discussed above, Draft EIR Section 3.2, “Aesthetics,” KVP 2 in Figure 3.2-12 on p. 3.2-30 shows the Banya building with the simulated massing of the proposed project and variant. Some views from the sundeck would be altered by the proposed project and variant. However, as discussed above, views from private residences or businesses are not required to be analyzed under CEQA and are not considered publicly accessible.

These comments do not raise any issues concerning the adequacy or accuracy of the Draft EIR’s analysis of impact to scenic vistas. To the extent these comments are about the merits of the proposed project or the variant, these comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the project. This consideration is independent of the environmental review process.

#### **COMMENT AE-2: GENERAL AESTHETIC IMPACTS**

- **IBNA-1**

“IBNA Board of Directors have read and reviewed the Draft EIR for the India Basin Mixed-Use Project. We attended the hearing on this matter on October 19, 2017. Our greatest concerns are: 1) the two proposed 14 story towers, which will dwarf existing buildings and create aesthetic, wind, shadow, and other impacts;” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-1]*)

#### **RESPONSE AE-2**

The comment suggests that the two proposed 14-story buildings would create aesthetic, wind, and shadow impacts. The two 14-story buildings (up to 160 feet tall) would be at least 80 feet taller than surrounding proposed buildings under the proposed project and the variant, and have been analyzed throughout the Draft EIR. Specifically, these impacts are discussed in Draft EIR Section 3.2, “Aesthetics,” Section 3.9, “Wind,” and Section 3.10, “Shadow,” among others. The two proposed 14-story buildings, which would be located on the 700 Innes property, can be seen in the following figures in Section 3.2, “Aesthetics”: Figures 3.2-11, 3.2-13, 3.2-14, 3.2-16, 3.2-17, and 3.2-19. The 14-story buildings would not obstruct the dominant viewpoints presented in Section 3.2, “Aesthetics,” from publically accessible locations.

Wind impacts are analyzed in the Draft EIR, Section 3.9, “Wind,” pp. 3.9-5–3.9-22. The potential wind impacts from building heights are addressed under Mitigation Measure M-WI-1a, “Wind Impact Analysis and Mitigation for Buildings 100 Feet or Greater in Height during Partial Buildout,” which would require further wind analysis as the project site is developed in phases.

Shadow impacts are analyzed in the Draft EIR, Section 3.10, “Shadow,” including Figures 3.10-2–3.10-12, which show how the shadow of the towers would impact the surrounding buildings and open spaces for a limited time of the day. As discussed on Draft EIR, Section 3.10, “Shadow,” on p. 3.10-4, “the proposed project or variant would result in a significant impact if it would create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas.” Although occupants of nearby private properties may regard an

increase in shadow as undesirable, the increased shading of private properties as a result of the proposed project or variant would not be considered a significant impact under CEQA.

#### **D. Population and Housing**

The comment and corresponding response in this section relate to the topic of Population and Housing, evaluated in Draft EIR Section 3.3. The comments are further grouped according to the following issues:

- PH-1: Effects Related to Population Growth
- PH-2: Transportation Network Effects Related to Housing
- PH-3: Housing Affordability and Supply
- PH-4: Cumulative Population and Housing and Gentrification

#### **COMMENT PH-1: EFFECTS RELATED TO POPULATION GROWTH**

- **O-GA1-3**
- **O-GA2-3**

“I disagree when it comes to Impact PH-1 or further regarding the population and growth. If you’re going to have housing that’s 500, option of housing dwelling for 500, whether you’re building 500 or 1240, it will have a detriment to the population and growth.” (*Sheridan Noelani Enomoto, Greenaction, Draft EIR Hearing Transcript, October 19, 2017 [O-GA1-3]*)

---

“In addition, plans to promote kayaking at the site will directly contribute to the gentrification threatening to displace long time people of color residents from their community.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-3]*)

#### **RESPONSE PH-1**

The comment disagrees with the conclusion reached in Impact PH-1, under Section 3.3, “Population and Housing,” which states that the proposed project or variant would have a less-than-significant impact on direct or indirect population growth in the area. A comment also suggests that kayaking will directly contribute to gentrification, which threatens to displace residents, some of whom are people of color, from their community.

As stated on Draft EIR p. 3.3-9, the population growth impacts of development at all four properties at the project site are encouraged and planned for in the Bayview Hunters Point Area Plan, and thus, would be consistent with the City’s planned future uses for this area of the City. As mentioned in the Draft EIR at p. 3.3-6, the Regional Housing Needs Assessment, which projects the Bay Area’s housing needs based on regional trends, determined that San Francisco’s fair share of regional housing needs between 2015 and 2022 is 28,870 new residential units. The addition of 1,240 housing units under the proposed project would represent 4.3 percent of San Francisco’s housing needs by 2022. Likewise, the addition of 500 housing units under the variant would represent 1.7 percent of San Francisco’s housing needs by 2022. Additionally, Subsection D, “Environmental Analysis of the Revised

Proposed Project,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” describes the revised proposed project’s housing units. Therefore, although the proposed project or variant would cause the study area’s population to increase, growth in this area has long been the subject of many planning activities, including the Bayview Hunters Point Area Plan. In summary, the direct population and housing growth provided as part of the project aligns with the City’s effort to create a vibrant high-density, mixed-use neighborhood along the Bayview shoreline.<sup>33</sup> Therefore, impacts on population and housing were considered less than significant in the EIR and further analysis is not required. Secondary effects of population growth are analyzed in their respective sections of the Draft EIR, including Section 3.5, “Transportation and Circulation”; Section 3.6, “Noise”; Section 3.7, “Air Quality”; Section 3.11, “Recreation”; Section 3.12, “Utilities and Service Systems”; and Section 3.13, “Public Services.”

A comment also mentions that gentrification threatens to displace residents; however, on p. 3.3-9 in Section 3.3, “Population and Housing,” the Draft EIR states that the proposed project and variant would not cause the direct displacement of residents or the loss of residential units. Although the proposed project and variant would result in the relocation of approximately four people and the displacement of approximately two people, the proposed project and variant would create 1,240 or 500 housing units, respectively. Additionally, Subsection C, “Summary of Revisions to the BUILD Development,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” describes the revised proposed project’s housing units. In addition, the proposed project and variant would provide affordable housing in accordance with the City’s Inclusionary Affordable Housing Program and through payment of the Jobs Housing Linkage Fee or as otherwise provided in its development agreement.

With respect to the project’s potential to result in gentrification, CEQA Guidelines Section 15131(a) clarifies that social or economic impacts alone shall not be treated as significant effects on the environment. Evidence of social or economic impacts (e.g., rising property values, increasing rents, changing neighborhood demographics) that do not contribute to, or are not caused by, physical impacts on the environment are not substantial evidence of a significant effect on the environment. In short, social and economic effects are only relevant under CEQA if they would result in or are caused by an adverse physical impact on the environment. The comment provides a general assertion that displacement may arise, however, on p. 3.3-9 in Section 3.3, “Population and Housing,” the Draft EIR states that two existing residents, who are located at 838-840 Innes Avenue would be displaced by development on the 700 Innes property. There would be no measurable physical impact on the environment from the potential displacement of these residents. In addition, on balance, the increase in housing units at the site would offset the removal of two residential units from the rental housing market. Furthermore, the comment does not identify any environmental impacts resulting from the proposed project or variant that would require further study or mitigation under CEQA. Therefore, no further analysis is required, and no changes to the Draft EIR are required in response to these comments. However, these comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant. This consideration is made independent of the environmental review process.

---

<sup>33</sup> San Francisco, City and County of (San Francisco), *San Francisco General Plan, Bayview Hunters Point Area Plan*, adopted by the Board of Supervisors as Resolution 13917 on July 20, 1995; last amended by Resolution 18098 on June 3, 2010, [http://generalplan.sfplanning.org/Bayview\\_Hunters\\_Point.htm](http://generalplan.sfplanning.org/Bayview_Hunters_Point.htm), accessed September 22, 2016.



**COMMENT PH-2: TRANSPORTATION NETWORK EFFECTS RELATED TO HOUSING**

- **IBNA-3**

“and 3) the impact of proposed transportation changes on existing homes and businesses along Innes Avenue and the rest of India Basin. Attached to this letter we describe more fully our concerns about some elements of the EIR and the likely impacts of this project on our community.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-3]*)

**RESPONSE PH-2**

This comment suggests that the proposed transportation changes would impact existing homes and businesses along Innes Avenue and other nearby areas. Section 3.5, “Transportation and Circulation,” provides an analysis of transportation impacts caused by the proposed project and variant on existing residents and businesses. Specifically, Draft EIR Section 3.5 provides an analysis of the effects of the proposed project (including the proposed transportation changes) with respect to safety and circulation along Innes Avenue for motorists, bicyclists, and pedestrians; crowding on transit vehicles and the adequacy of existing transit services; delays to transit vehicles; commercial/freight loading and emergency vehicle access for existing uses; and construction traffic, travel/parking lane and sidewalk closures, and other construction-related issues that could affect transportation and circulation for existing homes and businesses. The Draft EIR concluded that project-level effects related to traffic hazards, including effects to bicyclists and pedestrians, transit delay, emergency access, and construction traffic, would be less than significant. The Draft EIR also concluded that project-level effects related to transit demand and loading would be less than significant with mitigation.

Furthermore, the project sponsors have undertaken extensive public outreach for potential transportation improvements in the India Basin area as part of various plans and projects, beginning with the CPHPS Transportation Plan and the India Basin Neighborhood Association Vision Plan in 2010. As described on pp. 3.5-83–3.5-84 of the Draft EIR, the street network changes identified in Table 3.5-26 are based on the changes already planned under the CPHPS Transportation Plan, as well as potential additional changes proposed under the IBTAP. Note that the IBTAP is not a formally adopted plan by the City. As discussed in detail on p. 3.5-83 of the Draft EIR, the IBTAP was developed by the project sponsors (BUILD) in coordination with FivePoint (developer for the Hunters Point Shipyard Phase I and CPHPS projects), SFMTA, San Francisco County Transportation Authority, SFPW, San Francisco Planning Department, Office of Community Investment and Infrastructure, Office of Workforce and Economic Development, Trust for Public Land, Gehl Studio, Fehr & Peers, and PG&E. The IBTAP built off the corridor improvements already planned under the CPHPS Transportation Plan and integrated work from other previous planning efforts, including the India Basin Neighborhood Association Vision Plan, the Bayview Transportation and Infrastructure Plan, the CPHPS Infrastructure Plan, streetscape improvements proposed in conjunction with the former PG&E Hunters Point Power Plant site, and development plans for the project site. Two community workshops for the IBTAP were held on January 27, 2015 and March 19, 2015. Draft recommendations were presented to the Planning, Development & Finance Subcommittee of the Hunters Point Shipyard Citizens’ Advisory Committee (HPSCAC) on June 4, 2015 and the final plan was presented at the HPSCAC’s full committee meeting on July 13, 2015.

As described on pp. 3.5-44–3.5-55 of the Draft EIR, some elements of the IBTAP would be incorporated into the proposed project and variant, including sidewalk improvements along street frontages, relocation of the Innes Avenue bikeways, and installation of new traffic signals along Hunters Point Boulevard and Innes Avenue. As described on p. 3.5-83 of the Draft EIR, the remainder of the IBTAP improvements summarized in Table 3.5-26 have not been approved since it is not a formally adopted plan and would require further environmental review before implementation, and it is likely that additional outreach and design refinement would be conducted if and when a decision is made to move forward with individual plan components. These particular components of the IBTAP that are not a part of the proposed project have been analyzed separately under Cumulative Conditions, and the Draft EIR’s analysis of Cumulative plus Project Conditions impacts specifically considers multiple streetscape scenarios (two with the IBTAP and one without the IBTAP) to address the uncertainty regarding these improvements. Responses TR-6, TR-8, and TR-9 provide additional discussions specific to these transportation issues and concerns. Accordingly, the project’s transportation impacts on existing homes and businesses on Innes Avenue and surrounding area have been adequately analyzed in the Draft EIR. This comment does not include any new information that would change any of the conclusions reached in the EIR.

### **COMMENT PH-3: HOUSING AFFORDABILITY AND SUPPLY**

- **IBNA-6**

#### “3.3 Population and Housing

Impact PH-1: The proposed project or variant would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure). CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact PH-I would have a less than significant CEQA impact.

IBNA believes that the approach for addressing the Impact of PH-I is faulty and needs further examination. The DEIR properly addresses the impact of population and housing in terms of “planned” housing (such as is proposed under this project plan). The DEIR addresses the project plans for adding 929 employees to the site and notes that the proposed on-site housing could accommodate all 929 individuals. Likewise, the variant proposes adding 3,535 employees to the site and specifically states that this number could not be accommodated in housing planned for the site, but states that those employees could easily find housing elsewhere in the region. However, all of this presupposes that these additional individuals to the area could afford any of the available housing, either on site or in the region. The Bay Area is experiencing an extreme housing shortage, most critically for individuals who earn a middle-class income. Nothing in this plan links up income levels of the new population with housing costs on-site.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-6]*)

### **RESPONSE PH-3**

The comment expresses concern that employees introduced to the project area may not be able to afford housing on the project site or in the region particularly under the project variant. The comment also expresses concern

about the housing shortage for middle-class residents. As described in Draft EIR Chapter 2.0, “Project Description,” on p. 2-23, the proposed project and variant would provide affordable housing in accordance with the City’s Inclusionary Affordable Housing Program and through payment of the Jobs Housing Linkage Fee, or as otherwise provided within the terms of its development agreement.

As stated in the Draft EIR, the proposed project and variant would construct a mixed-use development with a range of flexible uses that respond to market demands. Socioeconomics are discussed in Draft EIR Section 5.4, “Socioeconomic Considerations under CEQA,” beginning on p. 5-4. This section states that concerns have been raised in general throughout the City regarding the loss of middle-income jobs and affordable housing. However, these socioeconomic effects are not considered environmental effects unless they are shown to result in physical impacts on the environment and must be linked to the action undergoing CEQA review. Specifically, the CEQA Guidelines clarify that social or economic impacts alone shall not be treated as significant effects on the environment. Evidence of social or economic impacts (e.g., rising property values, increasing rents, changing neighborhood demographics) that do not contribute to, or are not caused by, physical impacts on the environment are not substantial evidence of a significant effect on the environment. In short, social and economic effects are only relevant under CEQA if they would result in or are caused by an adverse physical impact on the environment. By accommodating housing consistent with regional growth projections and, in particular, by increasing the supply of housing on the project site from the six residences currently located on the property, the proposed project and variant would provide some relief from the housing market pressures on the City’s existing housing stock. Therefore, as discussed in Draft EIR pp. 3.3-9–3.3-14, the project would not result in any significant impacts related to population and housing, and would not result in the displacement of any residents. The comment provides a general assertion that impacts to housing affordability may arise, but does not identify any physical environmental impacts that may result from the proposed project or variant that require further study or mitigation under CEQA. Therefore, no further analysis is required, and no changes to the Draft EIR are necessary. However, this comment will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant.

#### **Comment PH-4: Cumulative Population and Housing and Gentrification**

- **IBNA-7**
- **O-GA2-5**
- **O-TG-4**
- **I-Barshak-5**
- **O-TG-2**
- **I-Barshak-1**
- **O-TG-5**
- **O-TG-3**
- **O-TG-1**
- **O-GA2-5**
- **O-IBNA-7**

“Impact CPH-1: The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not substantially contribute to cumulative impacts related to population and housing.

CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact CPH-1 would have a less than significant CEQA impact.

The DEIR states that the additional supply of housing under the cumulative projects scenario would be between 54-57% of the Regional Housing Needs Assessment target for the City by 2022, and that the population growth under the cumulative projects would represent 12% of the City’s anticipated population growth by 2030. Yet these population estimates do not take into consideration the rising costs of housing in the region, and the corresponding increase in per-unit number of residents (rather than the 2.1 number-per-unit used in the DEIR) necessary to afford the costs of housing. We believe a deeper examination of this should be addressed.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-7]*)

---

### “V. Population and Housing: Section 3.3

The DEIR’s conclusion in Section 3.3 that “The proposed project or variant would not induce substantial population growth in an area... “ and thus have a “Less than significant” impact is contradicted by the facts of the project proposal. The project proposes to build either 1,240 dwelling units or 500-which clearly would involve thousands of new residents in the area.

The conclusion that “The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not substantially contribute to cumulative impacts related to population and housing” is also factually incorrect. The BUILD LLC project at India Basin, combined with the even larger Lennar/Five Points SF Shipyard project, would result in many thousands of new dwelling units and tens of thousands of new residents. In addition, as these projects are targeting a higher income level than that of most Bayview Hunters Point residents, these projects will have a major, significant and unavoidable negative impact including gentrification and the ultimate displacement of long time people of color and low income residents of the community.

These impacts are significant, negative, and unavoidable if the project is approved.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-5]*)

---

“This DEIR continues the Department’s continued practice of sophistic analyses in evaluating the overarching issues of cumulative jobs/housing balance due to City and Regional cumulative growth and development, which thereby leads to false conclusions there will be no resulting significant impact of displacement of current residents (aka “gentrification”). This DEIR is therefore legally inadequate.

There can be no dispute about the overarching facts-the City and the Region's measured cumulative growth in jobs and population is now far exceeding the supply of net new housing they need. And this shortfall is especially acute for lower-income households. Every data source confirms these facts.

This can mean only thing for any particular project that adds new employment anywhere in the City or Region - if the amount of new jobs exceeds the number of new housing units that workforce will need to live in within that same project: that project makes this situation - the City and Regional jobs/housing balance - worse. And as the DEIR admits, one of the two proposed India Basin Project Alternatives would have such a negative jobs/housing balance. The DEIR does not further calculate the subset of the negative balance that in particular impacts lower-income housing needs, but it is well understood that impact will be worse. It must do this." (*John Elberling, President, TODCO (TG), Letter, October 26, 2017 [O-TG-1]*)

---

"That the "pipeline" of approved and proposed City housing development is sufficient to make up the deficit at least with regard to the City's segment of the Regional housing market. This DEIR does not even address the cumulative City housing impacts, just the Regional and the Study Area. One problem with this is of course that these "pipeline" projects will take at least 25 years to build, while additional employment growth in the City will also continue. If that future growth is not balanced with the full amount of necessary new housing growth too, then obviously the current deficit situation built up in the last 7 years since the end of the Great Recession gets even worse, not better. In a way, this is double-counting. Either the "pipeline" will balance the shortfall of the last 7 years, or meet the needs of the next 25 years - but it can't do both as the DEIR infers. Another problem is now the ever-increasing reverse-commuting where higher-income South Bay workers are choosing to live in the City, thus adding even more housing demand than the City's own employment growth produces. And this issue is again especially acute with regard to resulting displacement impacts on existing low-income households." (*John Elberling, President, TODCO (TG), Letter, October 26, 2017 [O-TG-3]*)

---

"There are more, but that's a start.

The bottom line for the India Basin EIR is that the maximum residential alternative will not have a significant impact of causing displacement to City households due to its additional employment, but the maximum commercial alternative will. To be legally adequate, that is the Finding of Significant Impact that must be stated.

Actually to be honest, in a way I hope the City as usual ignores these EIR failings with further bafflegarb rhetorical excuses in the Comments' Responses, and the developer proceeds with approval of the maximum commercial alternative. We are looking for such a clear-cut project EIR exemplar to litigate these matters once and for all, and make future EIR's finally tell the truth about gentrification." (*John Elberling, President, TODCO (TG), Letter, October 26, 2017 [O-TG-5]*)

---

"I want to address the socio-economic issues associated with the proposed project, including gentrification, displacement and housing affordability. The development will have a negative impact on housing affordability.

As you know the high cost of market rate housing and a limited supply of affordable housing is causing displacement of lower income residents in neighborhoods all across SF. The proposed building of 1,240 high-end units of this project will increase demand for high income housing, instead of decreasing it. The more you build high income housing the more you will continue to displace lower income residents. The construction of this kind of high income housing raises rental and commercial prices for existing residents. I urge you to make a plan to build housing for low and moderate income residents.” (*Jackie Barshak, Individual, Barshak, Email, October 26, 2017 [I-Barshak-1]*)

---

“And then the DEIR seeks to mask this harsh impact reality with the same series of tired bullshit apologia we now read repeatedly in so many DCP EIR’s:

That new employees will somehow magically find someplace else to live in the City or Regional without displacing someone else via housing market price competition. This is utterly irrational. This is of course literally impossible when the total new housing needed cumulatively due to cumulative job/population growth is less than the total new supply in the same market area. Instead, like a housing game of musical chairs, some households will inevitably be priced out and displaced from the City and Region to make up that deficit. Where will they go? And this issue is again especially acute with regard to resulting displacement impacts on existing low-income households.” (*John Elberling, President, TODCO (TG), Letter, October 26, 2017 [O-TG-2]*)

---

“The proposed project would result in socio-economic effects that will impact the environment.” (*Jackie Barshak, Individual, Barshak, Email, October 26, 2017 [I-Barshak-5]*)

---

“ That there is no cause-and-effect between new development, both residential and commercial, and gentrification in the nearby communities. The Department continues to deny the well-known and often-studied housing market dynamics whereby market perceptions of a community directly lead changes in the market value of its housing and - if upward -displacement as an unavoidable outcome. For example, adding new amenities such as the Project’s proposed open space, increases value of adjacent neighborhoods’ residential properties. Increasing the population of higher-income classes (aka, the “Gentry”), as all new market-rate housing development like the Project inevitably will do, also makes existing housing in adjacent communities more attractive to that same higher-income group because there are ‘people like them’ now nearby. And in particular, increasing the population of White people, as all new market-rate housing development like the Project inevitably will do, also makes existing housing in adjacent currently predominantly minority communities more attractive to other White people. All this market-perception induced consequences of major new development inevitably will lead to actual household displacement in the existing communities due to housing market price competition. And this issue is again especially acute with regard to resulting displacement impacts on existing low-income households.” (*John Elberling, President, TODCO (TG), Letter, October 26, 2017 [O-TG-4]*)

**RESPONSE PH-4**

These comments state that the proposed project or variant in the Draft EIR did not adequately address cumulative impacts, and that there would be cumulative impacts related to population and housing, such as rising housing costs and an increase in the number of residents per housing unit, which could result in gentrification and the displacement of low-income residents.

A comment also indicates that the San Francisco Planning Department's "The Pipeline Report" (Pipeline) is not sufficient to meet the shortfall in housing supply during the past 7 years and the needs of the next 25 years and that this shortfall in housing supply is leading to the displacement of low-income households.

The discussion on p. 3.3-11 of the Draft EIR concluded that both the proposed project and variant would result in direct and indirect population growth that is already planned for in the Bayview Hunters Point Area Plan, and, thus, would be consistent with the City's planned future for this area of the City resulting in a less-than-significant population/housing impact. Furthermore, the Draft EIR, on p. 3.3-12, concluded that neither the proposed project nor the variant would displace existing housing units or persons that would necessitate construction of new units beyond the units proposed as part of the development resulting in a less-than-significant population/housing impact. On pp. 3.3-12 to 3.3-13 in Section 3.3, the Draft EIR states that development under the cumulative projects scenario would result in 16,648 new housing units or 15,573 new housing units, which in turn would result in 40,066 new persons or 37,375 new persons in the City. In particular, the projects listed in Table 3-1 in Section 3.0.3, "Format of the Environmental Analysis," that would increase population, housing, and employment under the cumulative scenario are the Candlestick Point and Hunters Point Shipyard (Phases I and II), Hunters View, Executive Park, Brisbane Baylands, and Visitacion Valley/Schlage Lock (Redevelopment Zones 1 and 2) projects.

Although this represents a substantial amount of population growth, cumulative projects would generate cumulative population, housing, and employment conditions that are within the 2030 projections formulated by the Planning Department, and would help the City meet its share of ABAG's Regional Housing Needs Assessment. The Regional Housing Needs Assessment determination includes production targets addressing the housing needs of a range of household income categories. San Francisco's Regional Housing Needs Assessment is incorporated into the City's 2014 Housing Element (adopted April 27, 2015). As required by State law, the San Francisco General Plan Housing Element discusses the City's fair share allocation of regional housing needs by income, as projected by ABAG.

Thus, the changes in employment and population, and potential demand for housing that would occur with implementation of the proposed project and variant in combination with the cumulative projects would not result in substantial population inducement, and this impact would be less than significant. Secondary effects of population growth are analyzed in their respective sections of the Draft EIR, including Section 3.5, "Transportation and Circulation"; Section 3.6, "Noise"; Section 3.7, "Air Quality"; Section 3.11, "Recreation"; Section 3.12, "Utilities and Service Systems"; and Section 3.13, "Public Services."

These comments assert that the proposed project and variant, in combination with the Lennar/Five Points San Francisco Shipyard Project, would result in many thousands of new dwelling units and tens of thousands of new residents. Table 3-1 on p. 3-6 of Draft EIR Section 3.0.3, "Format of the Environmental Analysis," lists the

cumulative projects that are analyzed in the cumulative analysis. The Candlestick Point and Hunters Point Shipyard (Phases I and II) Project is included in Table 3-1 and thus was included in the cumulative analysis in Section 3.3 of the Draft EIR. The Draft EIR concludes that cumulative projects would generate cumulative population, housing, and employment conditions that are within the 2030 projections formulated by the Planning Department. Therefore, The Draft EIR concludes that the development of cumulative projects would help the City meet its share of the Regional Housing Needs Assessment and that this impact would be less than significant. Consistent with the Planning Department's goal of meeting the Regional Housing Needs Assessment targets, development as a result of the proposed project and variant helps the City achieve these goals. Additionally, development under the cumulative scenario would not generate growth beyond the amount planned for in City and ABAG planning documents. Therefore, the Draft EIR includes an adequate analysis of the cumulative City housing impacts. The comment does not introduce new information that would result in a new environmental impact.

Gentrification and displacement that could result from the development of the proposed project or variant are socioeconomic issues rather than physical environmental issues. The CEQA Guidelines clarify that social or economic impacts alone shall not be treated as significant effects on the environment. Evidence of social or economic impacts (e.g., rising property values, increasing rents, changing neighborhood demographics) that do not contribute to, or are not caused by, physical impacts on the environment are not substantial evidence of a significant effect on the environment. In short, social and economic effects are only applicable under CEQA if they would result in or are caused by an adverse physical impact on the environment. In addition, the Draft EIR at p. 3.3-9 in Section 3.3, "Population and Housing," states that the proposed project and variant would result in the relocation of approximately four people and the displacement of approximately two people. However, the proposed project and variant would create 1,240 housing units, approximately 3,401 residents, and 929 permanent employees under the proposed project, compared to 500 housing units, 1,371 residents, and 3,535 permanent employees under the variant. Although the 3,535 permanent employees under the variant could not all be accommodated by the variant's 500 housing units, as described in further detail in Draft EIR Chapter 5.0, "Other CEQA Considerations," it can be assumed that most of these new employees would already be housed in other areas of San Francisco or in surrounding cities and would not directly cause displacement at the project site that could lead to the need for construction of replacement housing elsewhere. Additionally, Subsection D, "Environmental Analysis of the Revised Proposed Project," of Chapter 2, "Project Description Revisions and Clarifications, and the Revised Proposed Project," describes the revised proposed project's housing balance. Furthermore, as described on p. 2-23 in Draft EIR Chapter 2.0, "Project Description," the proposed project and variant would provide affordable housing in accordance with the City's Inclusionary Affordable Housing Program and through payment of the Jobs Housing Linkage Fee, as applicable, or as otherwise provided in its development agreement. As described in Draft EIR Section 5.4, "Socioeconomic Considerations under CEQA," on pp. 5-4 and 5-5, social or economic impacts alone are not changes in physical conditions. Therefore, the CEQA Guidelines provide that social or economic impacts may not be treated as significant effects on the environment and as a result, the Draft EIR does not discuss housing in terms of affordability to low-income residents.<sup>34</sup>

---

<sup>34</sup> CEQA Guidelines Sections 15358(b), 15064(e), and 15382.



These comments provide a general assertion that displacement may arise, but do not identify any physical environmental impacts that may result from the proposed project or variant that require further study or mitigation under CEQA. To the extent these comments are related to the merits of the proposed project versus the variant, this aspect is addressed in Response ME-10, and will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant. Therefore, no further analysis is required, and no changes to the Draft EIR are necessary.

## **E. Cultural Resources**

The comment and corresponding response in this section relate to the topic of Cultural Resources, evaluated in Draft EIR Section 3.4. The comments are further grouped according to the following issues:

- CR-1: Banya Building Is Not a Historic Resource under CEQA
- CR-2: Historic Resources CEQA Findings
- CR-3: Archeological Resources CEQA Findings

### **COMMENT CR-1: BANYA BUILDING IS NOT A HISTORIC RESOURCE UNDER CEQA**

- **I-Paul-1**
- **O-ODL2-1**
- **I-Grossblatt-1**
- **O-ODL1-1**
- **O-ODL1-2**
- **O-ODL1-3**
- **I-Blank-1**
- **O-ODL1-4**
- **I-Crescibene-1**

“Thank you, Vice President Richards. Thank you, Mr. Li, from the Planning Department. My name is Jeremy Paul. I have spent quite a bit of time over the years at this podium, but I have spent almost as much time at the Archimedes Banya, often wearing one of these. This is a sauna hat, it’s a Russian sauna hat. So I’m going to put that on as my prop -- no, I’m not.

Archimedes Banya is the -- it’s a cultural institution on the 700 block of Innes Street. It is surrounded on three sides by the development area. Archimedes Banya doesn’t seek to stop this development, but we do seek to be included in the Environmental Impact Report. This is an important cultural institution to a lot of people. It’s one of the most diverse communities I’ve ever been a part of in San Francisco. Racially, ethnically, age wise, economically, everyone there is there at the Banya and most of them are just wrapped in a towel.

The problem is this, that there are several different proposals for what will actually be done if this zoning change is approved. This organization does not have the resources to D.R. and fight design review over each individual

project that may be surrounding it subsequent to the zoning change. So we're asking that this developer include in this Draft EIR the studies of the potential impacts on the Archimedes Banya as a cultural institution." (*Jeremy Paul, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Paul-1]*)

---

"Good evening, Commissioners. My name is Onki Kwan and I'm an attorney at Open Door Legal. Open Door Legal is located in Bayview-Hunters Point and our core service area is Bayview-Hunters Point. So it's extremely important to us that the cultural and historical fabric of the community is preserved.

The Banya is located at 748 Innes and it's at the center of the proposed project. The EIR doesn't mention the project even once; however, it must be considered if it meets the definition of a historical resource.

Under the California Code of Regulations, a historical resource is any building, structure, site, area, or place which a leading agency determines to be historically significant. A resource is historically significant if at least one of the following criteria are met: It's associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; is associated with the lives of persons important in our past; embodies the distinctive characteristics of a type, period, region, or method of construction; or represents the work of an important creative individual; or possesses high artistic values; or has yielded or may likely to yield important information in prehistory or history.

The Banya meets several of these characteristics. The Banya has yielded or may likely yield information important in history or prehistory. The history of bathing spans several millennia and spans 1 different cultures, including European, Middle Eastern, and Asian cultures. This is reflected in the Banya's customer base which, as you've heard earlier, are very diverse, and they openly share their bathing rituals with each other. This is also reflected in the Banya's architecture, which takes influence from ancient bathing traditions. And the Banya also makes a concerted effort to educate patrons on the history of bathing.

The Banya is associated with the lives of persons important in our past. The full name of the Banya is Archimedes Banya. It's named after Archimedes because Archimedes isn't only the greatest mathematician of all time but he also made the revelation that the best ideas arise when you're relaxed in a hot bath, and we often forget that. The Banya reminds everyone of this and it encourages visitors to experience this for themselves.

The Banya also embodies the distinctive characteristics of a type, period, region, or method of construction, and possesses high artistic values. It's constructed based on ancient bathing rituals and it takes its influence from Greek, Turkish, German, and Russian traditions. When you enter the Banya you enter into this ancient world of bathing. And anyone who goes there can see their artistic values." (*Onki Kwan, Open Door Legal, Draft EIR Hearing Transcript, October 19, 2017 [I-ODL2-1]*)

---

"Hello. Thank you very much. My name is David Grossblatt. I live down the street from this project, so it will have a direct and big impact on my life. I live with my two children, a nine-year-old and a seven-year-old, as well as my wife.

Today I definitely want to talk about the fact that the Banya is very important to me and my children and my family. I have a mixed family, Asian and Russian, and the Banya is truly an amazing opportunity for my family to reconnect with our roots. I have taken my children there. It teaches us a lot about people from all over the world, my children as well, and all the types of people and the way people are in San Francisco. It's truly been an amazing experience for me, a transformative experience. And I just don't understand how a project in my neighborhood can progress, can proceed without acknowledging the impact that it would have on this extremely important cultural resource in my neighborhood.

And I don't necessarily think there is ill will here or bad intention, I just think that it's important that we all stand up now and say, hey, take a minute and make sure that all the relevant interests of the community are acknowledged in the Environmental Impact Report. So that's the only thing that I would advocate, to take a minute to do that.

And many of these people here from the Banya are my friends and they have become my friends and we have built a stronger community, a stronger global community because of the Banya, and this is super important for San Francisco. And it's super important that we don't lose this because we just weren't paying attention. Thank you very much.” (*David Grossblatt, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Grossblatt-1]*)

---

“We are a nonprofit legal aid organization located in Bayview/Hunters Point writing on behalf of Archimedes Banya SF, L.L.C. (the “Banya”), located at 748 Innes Ave and at the center of the proposed plan for the India Basin Mixed-Use project (the “Project”), which includes 700 Innes Ave., 900 Innes Ave., India Basin Shoreline Park, and India Basin Open Space locations. As a stakeholder in the cultural and historic fabric of the community, we are very interested in seeing that the cultural and historical integrity of Bayview/Hunters Point is preserved. The Banya has quickly become a culturally and historically significant part of not only Bayview/Hunters Point, but also San Francisco as a whole.

The Banya is a Russian bathhouse, the only one of its kind in the Bay Area. As such, it has attracted people from all over San Francisco and the world. This is unprecedented for Bayview/Hunters Point, a neighborhood, which unfortunately, is stereotyped as violent, dangerous, and a place to avoid. Despite the neighborhood's poor reputation, people have made, and continue to make, the trek to the Banya. This is unprecedented for any Bayview business and even more so for one in Hunters Point. In doing so, visitors' eyes have been opened not only to the history espoused by the Banya, but also to the rich cultural and historical fabric of Bayview/Hunters Point as a whole.” (*Onki Kwan, Open Door Legal, Letter, October 16, 2017 [O-ODLI-1]*)

---

“The California Code of Regulations provides that, “historical resources” shall include the following,

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical

resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. California Code of Regulations §15064.5(3).

A resource shall be deemed "historically significant" if one or more of the following criteria are met:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- (B) Is associated with the lives of persons important in our past;
- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history. Id.

The Banya meets the criteria for historical significance. Although the Banya is relatively new, the history of bathing spans several millennia and across different cultures, including various European, Middle Eastern, and Asian cultures. In fact, people from every cultural background and walk of life frequent the Banya because it is the only place of its nature in the City. The historic significance of the Banya is not simply alluded to. On the Banya's website is a detailed description of the history of bathing and both employees and patrons to the Banya openly share bathing rituals with each other and introduce newcomers to such rituals. Thus, the Banya "has yielded, or may be likely to yield, information important in prehistory or history." See CCR §15064.5(3)(D)." (*Onki Kwan, Open Door Legal, Letter, October 16, 2017 [O-ODL1-2]*)

---

"In addition, it is not a coincidence that the Banya is named, "Archimedes Banya." Archimedes is generally regarded as one of the greatest mathematicians and scientists of all time. However, it is often forgotten that Archimedes made another discovery: "The best ideas arise when you are relaxed in a hot bath." The Banya is dedicated to enlightening anyone who passes through its doors to this discovery. See <http://banyast.com/articles/archimedes-unknown-discovery>. Thus, the Banya "[i]s associated with the lives of persons important in our past" and "[h]as yielded, or may be likely to yield, information important in prehistory or history." See CCR §§15604.5(3)(B), 15064.5(3)(D)." (*Onki Kwan, Open Door Legal, Letter, October 16, 2017 [O-ODL1-3]*)

---

"Hi. My name is Roxanne. I am much shorter than everyone else that spoke here, apparently. I work at Archimedes Banya as a manager there as well and I'm a former resident of the neighborhood in the Bayview.

I don't have very much to say, but Archimedes was my first experience with communal bathing. The beautiful thing about communal bathing is that everyone, no matter what your background is, is allowed to come together. Kings and peasants, CEOs, entry-level interns, we all sweat the same. And this is really an important part of culture that's lacking in American culture overall, so Archimedes is trying really hard to bring this to San Francisco and preserve it. And if the EIR doesn't include Archimedes in its plans, San Francisco is really at risk at

losing this big cultural influence. Thank you.” (*Roxanne Blank, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Blank-1]*)

---

“Further, any visitor to the Banya can see that it “[e]mbodies the distinctive characteristics of a type, period, region, or method of construction” and “possesses high artistic values.” /d. at §15604.5(3)(C). The Banya was specifically constructed with ancient bathing rituals in mind and takes its influence from ancient traditions of Greek laconia, Turkish hammam, German therman, and Russian banya. The visitor is instantly transported from the high-tech, hyper-connected world to a world of ancient bathing rituals. The art, construction, architecture, food, and location are integral parts of these “distinctive characteristics.” In addition, it is unquestionable to anyone who has been inside the Banya that it is place that “possesses high artistic values.”

As such, we respectfully request that the Planning Commission find that the Banya is a historical resource and order a full and complete assessment of the impacts on Banya in the EIR.” (*Onki Kwan, Open Door Legal, Letter, October 16, 2017 [O-ODL1-4]*)

---

“I live in Novato, work in San Francisco and am a longtime patron and supporter of Archimedes Banya, which has become something of a second home to me. The India Basin Mixed-Use Project would surround this important cultural institution on three sides.

The banya opened on Dec. 31, 2011, at 748 Innes Ave., now employs more than 50 people and serves 1,200 customers per week. People of all races, nationalities, ethnicities, genders and economic circumstances come together at the banya to soak away their tensions in the facility’s pools or steam away their worries in the saunas. Archimedes Banya features the only commercial Russian sauna (parilka) in Northern California.” (*Chris Crescibene, Individual, Crescibene, Email, October 29, 2017 [I-Crescibene-1]*)

## **RESPONSE CR-1**

Several of the comments state that the Archimedes Banya building located at 748 Innes Avenue is a cultural institution, is a culturally and historically significant property within the neighborhood, and meets the eligibility criteria for the California Register of Historical Resources and should be considered a qualified historic resource under CEQA. Other comments cite California Code of Regulations Section 15064.5(3) related to historical resources, including criteria that deem a resource historically significant, and state that the Banya meets these criteria. Additional comments state that the Banya is not included in the EIR plans and San Francisco is at risk of losing its cultural influence. Furthermore, commenters state that the project cannot proceed without acknowledging the impact of this important cultural resource.

CEQA Guidelines Section 15064.5(3) provides that “Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency

to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources.”

According to CEQA, buildings constructed over 50 years ago that possess architectural or historical significance may be considered potential historic resources, and proposed changes to these buildings may require some level of environmental review to determine the impacts to these potential historic resources.<sup>35</sup> The Archimedes Banya Building located at 748 Innes Avenue was built in 2011, and the business has been in operation since that time. For buildings that are less than 50 years old, potential historic significance may be considered if sufficient time has passed to obtain a scholarly perspective on the events or individuals associated with the building. Having only been in existence for 7 years, the property’s history as a cultural institution is too recent to have historical perspective regarding historic significance. The evaluations for California Register eligibility are based on local, state, and national historic contexts developed from scholarly sources. A functional association with the history of bathing, and possession of a name that is associated with a historical figure as suggested in one of the comments, is not sufficient evidence for California Register eligibility.

One comment suggests that the Banya is a historic resource due to its association with Archimedes, a historical figure who lived in Italy in the third century BC. According to the evaluation process that is outlined in National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (on which the California Register criteria are based), a finding of significance under California Register Criterion 2 for properties that are associated with the lives of persons significant in our past involves several steps. First, the person associated with the property must be identified as individually significant within a historic context and cannot simply be a member of an identifiable profession, class, or social or ethnic group. Second, a property eligible under Criterion 2 must be associated with the person’s productive life, reflecting the time period when he or she achieved significance. Among all places associated with the person, the subject building must best represent his or her contribution. Also, the individual’s association with the property must be documented by accepted methods of historical research, including written or oral history. Speculative associations are not sufficient. The Banya, a building built in 2011, is not associated with the productive life of Archimedes. Furthermore, the commenter has provided no evidence by methods of historical research, writing or oral history to document Archimedes association with the Banya. Accordingly, this comment does not bring forth sufficient evidence that the Banya meets the California Register Criterion 2 in association with Archimedes.

Another comment suggests that the Banya qualifies under California Register Criterion 4 regarding structures “that have yielded, or may be likely to yield, information important in prehistory or history,” which most commonly relates to archeology. According to National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (which the California Register criteria are based on), the property must have characteristics suggesting the likelihood that it possesses configurations of artifacts, soil strata, structural remains, or other natural or cultural features that make it possible to test a hypothesis or hypotheses about events, groups, or processes in the past that bear on important research questions in the social or natural sciences or the humanities; corroborate or amplify currently available information suggesting that a hypothesis is either true or false; or reconstruct the sequence of archeological cultures for the purpose of identifying and explaining continuities and discontinuities in the archeological record for a particular area.

---

<sup>35</sup> Note that the San Francisco Planning Department uses a 45-year threshold rather than 50-year threshold for identification of potential historic resources.

Although most often applied to archeological sites, Criterion 4 also can apply to buildings, structures, and objects that contain important information related to their construction. In order for these types of properties to be eligible under Criterion 4, they themselves must be, or must have been, the principal source of the important information. Having only been in existence for 7 years, the property's history as a cultural institution is too recent to have historical perspective regarding historic significance. This comment does not bring forth evidence that the Banya meets the Criterion 4 eligibility for the California Register of Historical Resources and would be considered a qualified historic resource under CEQA.

The Archimedes Banya building is located adjacent to the proposed project and variant project site and was analyzed in the EIR under each relevant topic as part of existing conditions; however, the name "Banya" was not included in the Draft EIR. Text changes have been made to the Draft EIR in Chapter 2.0, "Project Description," and Section 3.2, "Aesthetics," identifying the building by name for clarification. See Response GC-4 and Response AE-1 regarding how the Banya was addressed in the aesthetics, wind, shadow, noise, and air quality sections of the Draft EIR.

## **COMMENT CR-2: HISTORIC RESOURCES CEQA FINDINGS**

- **HPC-1**
- **A-HPC-2**
- **A-HPC-3**
- **A-HPC-4**
- **O-BHS-4**

"On October 4, 2017, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed India Basin Mixed-Use Project (2014-002541ENV). After discussion, the HPC arrived at the comments below:

"The HPC confirms that the DEIR adequately analyzed cultural resources." (*Andrew Wolfram, President, Historic Preservation Commission, Letter, October 16, 2017 [A-HPC-1]*)

---

"The HPC concurs with the findings that the proposed project does not meet the Secretary of the Interior's Standards and would result in a significant and unavoidable impact on an identified historic resource, the India Basin Scow Schooner Boatyard Vernacular Cultural Landscape." (*Andrew Wolfram, President, Historic Preservation Commission, Letter, October 16, 2017 [A-HPC-2]*)

---

"The HPC agreed that the DEIR analyzed an appropriate range of preservation alternatives to address historic resource impacts. Further, the HPC appreciated that the preservation alternatives not only avoid some or all of the identified significant impacts but also met or partially met the project objectives." (*Andrew Wolfram, President, Historic Preservation Commission, Letter, October 16, 2017 [A-HPC-3]*)

“The HPC supports the mitigation measures presented in the DEIR. The HPC specifically supports a robust interpretation program for the India Basin Scow Schooner Boatyard Vernacular Cultural Landscape that will interpret the significant features of the landscape and will present the history of boatbuilding at the project site and in the region.” (*Andrew Wolfram, President, Historic Preservation Commission, Letter, October 16, 2017 [A-HPC-4]*)

---

“For example, the Page and Turnbull Report provides this overview to the Cultural Resources section:

#### SUMMARY OF FINDINGS

This report evaluates five properties, or sub-areas, within the project area determined to be over 50 years in age, therefore considered potentially eligible for listing in the California Register. These sub- areas are: the Shipwright’s Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site; 838-840 Innes Avenue; and 702 Earl Street. No other properties or features within the project area are of an age to qualify for listing in the California Register. Page & Turnbull’s findings indicate that three California Register-eligible properties exist: the Shipwright’s Cottage (previously designated as San Francisco Landmark #250 under Article 10 of the Planning Code); the India Basin Scow Schooner Boatyard site, including three buildings and several objects and landscape features; and the former boatyard building at 702 Earl Street. These properties would therefore be considered historic resources for the purpose of review under the California Environmental Quality Act (CEQA).

Appendix C \_ Cultural Resources Supporting Information\_ Part2: Page and Turnbull Report: p3

Further noted in Appendix C. 3.1.1., under Federal Regulations, “Historic Sites Act (1935). The Historic Sites Act, Title 16, Section 461 and following of the United States Code (16 USC 461 et seq.), declares a national policy to preserve historic sites, buildings, antiquities, and objects of national significance, including those located on refuges. The Historic Sites Act provides procedures for designation, acquisition, administration, and protection of such sites.” and “California Code of Regulations, Title 14, Section 4307. This state preservation law prohibits removal, injury, defacement, or destruction of objects of paleontological, archeological, or historical interest or value.”

We believe that the historical interest in the area is supported by the obvious ‘value’ of the people and activities which are clearly documented and understood. This local, Bayview-based history is largely unknown to many in San Francisco, yet the India Basin activities in the late 19th Century are reflective of the actions and passions of our City’s pioneers.

“Upon relocating to the northern shore of the remote Hunters Point peninsula, the immigrant shipwrights were finally able to begin building scows and other vessels in one location for over half a century without disturbance. Noting the concentration of family-run boatyards in the area, an article in the November 1869 edition of the San Francisco Real Estate Circular stated that “South San Francisco will undoubtedly be one of the most valuable locations for shipbuilding and manufacturing purposes in the county.”<sup>52</sup> The boatyards that operated at India Basin were small-scale and tended to operate with informal verbal contracts. Their boatyards were frequently home-based industries, with their houses located on or near the boatyard properties. Despite their small scale, the



manufacturing and repair of hand-made sailing vessels was vital to San Francisco's distinctive maritime-based economy. According to the 1880 Census schedules, several of the first settlers in India Basin were English, including Albion Brewery's John Burnell and Reverend George E. Davis, a pioneer from London who moved to the corner of 8<sup>th</sup> Avenue South (Hudson) and 'H' (Hawes) Street in 1873. Other European immigrants who moved to India Basin in the 1860s and 1870s included Netherlands-born Johnson J. Dircks (1869), William Munder (1869), Hermann Metzendorf (1872), Edmund Manfred (1875), and Fred Siemer (1886), all from Germany. Ireland contributed John McKinnon (1868) and James Pyne. Denmark was a primary source of boat builders, including O.F.L. Farenkamp (1877), Henry Anderson (1893), and Otto Hansen.

The first known shipwright to move to India Basin was Johnson J. Dircks. He established a yard at the corner of 5th Avenue South (Evans) and 'L' (Lane) Street in 1868. Not long after, in 1871, William Stone moved his yard from Potrero Point to 9<sup>th</sup> Avenue South (Innes), near 'G' (Griffith) Street. In 1876, Dircks moved all of his operations to a site next to Stone's on 9th Avenue South.<sup>54</sup> By 1880, Dircks' and Stone's sons began to apprentice with their fathers. The passing on of knowledge and craft was a common cultural practice among the boat-building families of India Basin; indeed most of the men who had migrated to the area had learned the craft from their fathers in Europe. The shipwrights in India Basin - Dircks, Stone, Siemer, and Anderson - passed on their craft to their native-born American sons, thereby developing a longstanding tradition of boatbuilding in the neighborhood that would last three generations.<sup>55</sup> 1883 Coast Survey Map The 1883 U.S. Coast Survey map is the first map to illustrate the extensive changes that had occurred."

India Basin Historic Survey/KVP pp.27 Bayview Historical Society publication 2008

A letter from Johnson J. Dircks great, great grandson, Brian Dircks, is attached to this correspondence and captures his spirit when celebrating the 900 Innes Avenue \_Shipwrights's Cottage in 2014.

As part of the Cultural Resources appendix in the Draft EIR, the cottage is further linked to the larger historical context which clearly includes the India Basin Scow Schooner Boatyard and other resources.

#### 5.1.1. Shipwright's Cottage

As indicated in the HRE (Page & Turnbull, 2016:6), the Shipwright's Cottage at 900 Innes Avenue was found individually eligible for listing in the CRHR by KVP under Criteria 1 and 3 "due to its association with resident shipwrights employed in the boat yards of India Basin and as a rare example of a very early Italianate cottage. It is only one of two remaining nineteenth-century dwellings (the other being 911 Innes) in India Basin." The period of significance for the Shipwright's Cottage was identified as 1870-1938, the fullest possible period considered by the survey.

In 2008, in light of the KVP effort (2008) the Shipwright's Cottage was designated San Francisco Article 1 O Landmark #250. The building's designation nomination encompasses only the residence and no surrounding features. The Landmark Designation Report completed for the Shipwright's Cottage found the building to be significant under Criteria A (Events) and C (Architecture), and specified the period of significance as 1870-1930 (which encompasses several years before the building's construction around 1875) (Page & Turnbull, 2016:7).

## Appendix C Cultural Resources Supporting Information\_ Part2: Page and Turnbull Report

## 5.1.3. India Basin Scow Schooner Boatyard

The KVP survey (2008) also identified a potential CRHR-eligible historic district, the India Basin Boatyards Historic District, comprising numerous buildings and other landscape features across eight parcels once associated with the Anderson & Cristofani and adjoining Allemand Brothers Boatyards. A DPR 523D (District Record) form was completed for this district, listing the period of significance as 1893 to 1935. According to Page & Turnbull (2016:6), KVP identified numerous resources within the boundaries of the district but did not specify contributors and noncontributors. Page & Turnbull further noted (2016:6) that several of these listed resources were constructed outside of the identified period of significance. Page & Turnbull refined KVP's assessment, determining that the boatyard site is most appropriately defined as a vernacular cultural landscape, a type of property that has "evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family, or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives" (Birnbaum, 1994). The India Basin Scow Schooner Boatyard, as it was subsequently designated by Page & Turnbull (2016:19), aligns in some respects with the India Basin Boatyards Historic District that KVP previously identified, although Page & Turnbull has determined that the property is more appropriately described as a site than as a historic district given its numerous landscape features (natural and manmade) that convey its significance (2016:99). The beginning of the India Basin Scow Schooner Boatyard's period of significance is 1875, the year that Johnson Dircks first established a boatyard at the site, which was later acquired by Henry Anderson and expanded as the Anderson & Cristofani Boatyard. Page & Turnbull (2016:99) finds that 1936 is the most appropriate end date of the period of significance as this year marks the opening of the San Francisco-Oakland Bay Bridge. From this point forward, the transportation of goods via vehicle (as opposed to vessel) became predominant in the Bay Area and marks the ultimate end of the era in which wood watercraft (the boatyard's specialty) was integral to the Bay Area's transport economy (Page & Turnbull, 2016:99).

The India Basin Scow Schooner Boatyard is characterized by a range of built and natural features that date to this decades-long use as a boatbuilding and repair yard-including six buildings, four structures, and several small-scale features, in addition to topography, views, circulation routes, and bodies of water (Plate 1). These features continue to convey the spatial and functional relationships that defined the operations of the yard and can be internal to or external to the property boundaries.

Page & Turnbull (2016:99) determined that the India Basin Scow Schooner Boatyard site is: historically significant site under Criterion 1, for its associations with San Francisco's wood scow schooner building and repair industry that was centered at India Basin. Scow schooners were integral to the transportation of goods throughout the San Francisco Bay area during the late nineteenth and early twentieth centuries, prior to the era of widespread automobile use and bridge construction. The remote settlement of immigrant shipwrights at India Basin was responsible for building and repairing such vessels and represented an important working community that, while off the beaten path, supported the region's economy through skilled workmanship. Due to gradual development around India Basin and dramatic infilling of the shoreline, much of the landscape conveying the previous era of shipbuilding no longer exists. As the site of the longest consecutively operating boatyards at India

Basin, the India Basin Scow Schooner Boatyard is the best remaining physical representation of the area's significant working class community.

The India Basin Scow Schooner Boatyard as defined by Page & Turnbull is particularly relevant to the current investigation because any historic maritime archeological resources occurring in the APE, specifically those that relate to the local boatbuilding industry during the period of 1875–1936, would potentially be contributing features to this vernacular cultural landscape site. Table 2 lists the elements of the India Basin Scow Schooner Boatyard and their construction dates, and identifies whether they are considered contributing features.

Appendix C Cultural Resources Supporting Information\_ Part1: Aecom Report: Section 5.1.3. Archeological Survey Report India Basin Mixed-Use Project

The 'contributing' status of various buildings, pathways and other resources as outlined in Table 2, attached to the above Appendix C, Part1, Aecom Report Sect. 5.1.3 provides a guideline for designing and implementing the Full Preservation Alternative. The significance of the area is further articulated in these comments regarding eligibility for inclusion in the California Historic Register.

#### INDIA BASIN SCOW SCHOONER BOATYARD California Register Eligibility

##### Criterion 1

Page & Turnbull finds that the India Basin Scow Schooner Boatyard site, a boat building and repair yard in operation beginning in the 1870s, is a historically significant site under Criterion 1, for its associations with San Francisco's wood scow schooner building and repair industry that was centered at India Basin.

Some aspects of the site's integrity, namely materials and workmanship, are somewhat compromised. Most features within the property have been neglected and are in various states of decay and collapse, or are heavily overgrown to the point that original materials, design features, and workmanship cannot be fully conveyed. In spite of these issues, Page & Turnbull considers that enough features remain at the site to convey the significant overall functional relationships that have characterized the boatyard for many decades. The India Basin Scow Schooner Boatyard is therefore considered to have adequate overall integrity to convey its historic significance.

Appendix C\_Cultural Resources Supporting Information\_ Part2: Page and Turnbull Report

INDIA BASIN PROJECT HISTORIC RESOURCE EVALUATION PARTS 1 AND 2 March, 2017" (*Dan Dodt, President, Bayview Historical Society, Email, October 27, 2017 [O-BHS-4]*)

#### **RESPONSE CR-2**

These comments generally indicate the HPC's agreement with the cultural resources-related analyses in the Draft EIR. A comment also restates text from the India Basin Survey, prepared by the Bayview Historical Society,<sup>36</sup> the India Basin Project Historic Resource Evaluation Parts 1 and 2, prepared by Page & Turnbull,<sup>37</sup> and Draft EIR

<sup>36</sup> Bayview Historical Society, *India Basin Historic Survey, San Francisco, California, Final Report 2008*, Prepared by Kelley & VerPlank Historical Resources Consulting. This document (and all other documents cited in this report, unless otherwise noted), is available for review at the San Francisco Planning Department, 1650 Mission Street, Suite 400 as part of Case File No. 2014-002541ENV

<sup>37</sup> Page & Turnbull, *India Basin Project Historic Resource Evaluation Parts 1 and 2*, prepared by Page & Turnbull, San Francisco, 2017.

Section 3.4, “Cultural Resources,” to acknowledge the importance of preserving the site’s integrity and that the Draft EIR should be consistent with these reports.

The comment does not mention anything in the Draft EIR that is inconsistent with these reports. Furthermore, these comments do not raise any specific environmental issues or questions regarding the adequacy or accuracy of the Draft EIR’s analysis. As a result, no changes to the EIR are required in response to these comments.

### **COMMENT CR-3: ARCHEOLOGICAL RESOURCES CEQA FINDINGS**

- **O-GA2-6**

“VI. Cultural Resources: Section 3.4

Greenaction agrees with the DEIR’s conclusion that “Construction under the proposed project or variant would disturb human remains, including those interred outside of formal cemeteries.” This area of Bayview Hunters Point is known to have been occupied the Ohlone people. Any project that would disturb, remove or desecrate human remains of the original inhabitants of this land is unacceptable. These remains should be respected and not be removed from their resting place. This would be a significant negative impact that is unavoidable and cannot be mitigated.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-6]*)

### **RESPONSE CR-3**

This comment states that the project would affect human remains of original inhabitants of the project area, and that disturbance of these remains would be a significant and unavoidable impact. As presented in Draft EIR p. 3.4-54, “No known human burial locations have been identified within the study area during the completion of the archeological investigation.” The Draft EIR does not, however, state that “Construction under the proposed project or variant would disturb human remains, including those interred outside of formal cemeteries” as is indicated in the comment. Because there is the potential that human remains, including those interred outside of formal cemeteries, could be inadvertently exposed during ground-disturbing activities in the portion of the study area landward of the 1859 shoreline (an area of elevated sensitivity for harboring buried prehistoric archeological resources), Draft EIR Section 3.4, “Cultural Resources,” on p. 3.4-57 included Mitigation Measure M-CR-3a, “Implement Legally Required Measures in the Event of Inadvertent Discovery of Human Remains.” Mitigation Measure M-CR-3a requires immediate notification of the City Coroner and prompt agreement related to appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects as determined by a qualified archeologist. Implementation of Mitigation Measure M-CR-3a would reduce the impact resulting from potential accidental disturbance of unknown human remains, including those interred outside of formal cemeteries, to a less-than-significant level. No changes to the Draft EIR are necessary in response to this comment.

## **F. Transportation and Circulation**

The comment and corresponding response in this section relate to the topic of Transportation and Circulation, evaluated in Draft EIR Section 3.5. The comments are further grouped according to the following issues:

- **TR-1: Pedestrian and Bicyclist Access to the Bay Trail**

- TR-2: Vehicle Miles Traveled Methodology and Findings
- TR-3: Transit Capacity Impacts
- TR-4: Loading Impacts
- TR-5: TNCs, CPHPS Data, and Mode Split Methodology

#### **COMMENT TR-1: PEDESTRIAN AND BICYCLIST ACCESS TO THE BAY TRAIL**

- **A-ABAG-3**
- **A-ABAG-4**
- **A-ABAG-5**
- **A-ABAG-6**

“Transportation and Circulation

The DEIR should more clearly identify any potential impacts to existing or planned public access via the Bay Trail, including potential impacts during project construction, and offer suitable mitigation for such impacts. The DEIR should clearly identify when segments of the Bay Trail would be constructed during the proposed seven phases of construction. The Bay Trail should be completed in the earliest phases possible and segments should be opened for public use as they are constructed, safety permitting.” (*Ben Botkin, San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Letter, October 27, 2017 [A-ABAG-3]*)

---

“The DEIR should consider the Bay Trail in its regional context as an important commute corridor. It is important that the shoreline trail in this location be a paved Class I multi-use path at least 12’ in width with 3’ shoulders on either side in order to comfortably accommodate both cyclists and pedestrians, and in order to match the segments it will be connecting with at Hunters Point Shoreline, and southward through to Hunters Point Shipyard and Candlestick Point. With substantial planned population growth in the area, having a continuous Bay Trail alignment from these neighborhoods to employment centers will be of growing importance.” (*Ben Botkin, San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Letter, October 27, 2017 [A-ABAG-4]*)

---

“Connections to and from the Bay Trail into the surrounding neighborhoods are also of key importance. Please evaluate the best options for bicycle and pedestrian circulation to and from the waterfront, and include proposed locations for bicycle racks and wayfinding signage.” (*Ben Botkin, San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Letter, October 27, 2017 [A-ABAG-5]*)

---

“Page 3.5-23 states that the Bay Trail is a “...a continuous 400-mile network of bicycling and hiking trails; 338 miles of the alignment have been completed to date.” Please note that the Bay Trail is a planned 500-mile trail and

that 354 miles have been completed to date.” (*Ben Botkin, San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Letter, October 27, 2017 [A-ABAG-6]*)

## **RESPONSE TR-1**

These comments generally relate to the Bay Trail. More specifically, these comments request that the Draft EIR include more detail regarding the timing of construction of the Bay Trail, acknowledge that the Bay Trail is an important commute corridor for the region, and require that the Bay Trail be at least 12 feet in width, with additional 3-foot shoulders on either side. The comments also request that options for bicycle and pedestrian circulation be further evaluated and that the length of the Bay Trail (both completed and planned) be updated in the Draft EIR.

### Phasing and Construction

Completed segments of the Bay Trail on the project site currently consist of two distinct and separate segments. At the western end of the project site, a continuous trail is currently provided from Cargo Way and Heron’s Head Park, terminating within India Basin Shoreline Park at the boundary with the 900 Innes property. On the eastern half of the project site, a separate, discontinuous segment is currently provided within the India Basin Open Space property, terminating at the boundaries with the 900 Innes property (to the west) and Hunters Point Shipyard (to the east). These two existing segments would be reconstructed, and a new connection would be added on the 900 Innes property to provide a continuous trail through the project site. Temporary closure of the existing parts of the trail during construction is necessary to make the proposed improvements. This closure would temporarily restrict public access to the waterfront within the project site, but would not create a gap in the continuity of the Bay Trail across the project site because the trail is currently discontinuous.

The proposed Bay Trail improvements would be implemented in phases. The existing gap in the Bay Trail through the project site (i.e., that part located on the 900 Innes property) would be constructed during Phase 1. Reconstruction of the western part of the trail on the India Basin Open Space property and associated improvements on the 700 Innes property would also be part of Phase 1; work on the eastern part would be part of Phase 2. Reconstruction of the existing trail segment on the India Basin Shoreline Park property would also be part of Phase 2, as presented in Draft EIR Chapter 2.0, “Project Description” (see pp. 2-64–2-72). Although the project is seeking a development agreement permitting implementation and phasing of the project over a number of years, the analysis of project impacts in the Draft EIR, including construction impacts, adopted a conservative approach regarding the time of buildout. Therefore, the Draft EIR evaluates the maximum impact possible during buildout, with construction on the India Basin Shoreline Park and 900 Innes properties completed in two phases over 2 years and construction on the India Basin Open Space and 700 Innes properties completed in two phases over 5 years. Construction and the associated temporary closures of the Bay Trail would be much shorter and fall within these time periods.

Construction-related impacts of the proposed project and variant—including construction activities for the proposed Bay Trail improvements—are addressed under Impact TR-10 of the Draft EIR, which concludes that construction-related impacts of the proposed project or variant would be less than significant (pp. 3.5-76–3.5-78). Despite this significance determination, the Draft EIR further addresses potential construction-related effects by identifying Improvement Measure I-TR-10, “Implement Construction Management Strategies,” which includes

specific measures to minimize disruptions to bicycle and pedestrian safety and circulation. This improvement measure would apply to the proposed Bay Trail improvements as it would to other components of the proposed project and variant, and would address potential construction-related effects on bicycle and pedestrian safety and circulation along potentially affected segments of the Bay Trail.

To minimize disruption due to temporary closure, the project sponsors would provide public access to the existing Bay Trail throughout the course of construction, with interruptions minimized to the extent possible. The existing Bay Trail in the India Basin Open Space is degraded from a lack of maintenance. For example, in some areas the pavement is entirely broken and plants have covered portions of the path, limiting public access. The project sponsors have proposed to improve the existing Bay Trail, removing shrubbery and smoothing portions of the existing pathway to enhance pedestrian access prior to commencing construction on the adjacent development site. Public access to the existing Bay Trail would be preserved throughout the majority of the construction period and would only be closed when construction of the new Bay Trail alignment traversing the Big Green has been completed. To the extent possible, all existing public access points would be preserved; however, temporary closures of access points may be necessary during the regrading and reconstruction of the New Griffith Street, Earl Street, and Arelious Walker Drive ROWs. During the reconstruction of these ROWs, the project sponsors would work with BCDC and/or SFPW to provide safe public access to the Bay Trail/shoreline area. These closures would not substantially interfere with pedestrian circulation and accessibility to the project site and adjoining areas in such a way that hazardous conditions could occur, as public access on the Bay Trail is currently discontinuous and only parts of the Bay Trail within the project site would be under construction at any given time.

#### Bay Trail Design Standards

Although the width of the Bay Trail through the project site has not been finalized, approximate widths on individual segments have been identified as part of conceptual planning and design for the site. The Conceptual Site Plan as illustrated in the Draft Design Standards and Guidelines included in Draft EIR Appendix B includes a Bay Trail that ranges from 12 feet to 20 feet in width (where feasible) through the 700 Innes and India Basin Open Space properties. Through the India Basin Shoreline Park and 900 Innes properties, the Bay Trail would be a minimum of 12 feet along the shoreline within India Basin Shoreline Park, 12 feet along the Class I bikeway connecting the main Bay Trail segment with Hunters Point Boulevard, and 24 feet within the 900 Innes property, where feasible. The project proposes a minimum 12-foot width at some locations because design challenges including slope/topography considerations and limited space to create new tidal marsh and uplands habitat along the Bay may restrict the ability to provide a wider Bay Trail at those locations. The Bay Trail would only be at its proposed minimum width of 12 feet for approximately 200-foot-long sections before meeting another turnout, amenity zone, intersecting path, or destination, where it would widen to 20 feet.

The project would not include separate 3-foot shoulders for the Bay Trail and would not, therefore, strictly comply with the recommended design standards in the San Francisco Bay Trail Design Guidelines and Toolkit. However, the project would instead include many different forms of shoreline access to parallel and supplement the Bay Trail, including sidewalks and paved paths, hiking trails, a shoreline boardwalk, and shared public ways. These alternative facilities would provide additional capacity and redundancy to handle projected bicycle and pedestrian activity along and parallel to the Bay Trail and would perform functions similar to the recommended 3-foot shoulders in locations where the project only proposes to provide 12 feet.

The proposed Bay Trail improvements (including the minimum 12-foot width at some locations) and supporting components of the proposed project and variant (including parallel and supplementary forms of shoreline access) are discussed in the context of potential impacts to bicycle and pedestrian circulation under Impacts TR-5 and TR-6, respectively, of Draft EIR Section 3.5, “Transportation and Circulation.” As stated on pp. 3.5-64–3.5-71, the Draft EIR concludes that the proposed project and variant would have less-than-significant impacts to bicycle and pedestrian circulation. See Response PD-1 for a discussion regarding the Bay Trail design and figures clarifying the width of the Bay Trail through all four properties on the project site. The width of the Bay Trail through the project site has also been described and added to Draft EIR Chapter 2.0, “Project Description,” on pp. 2-29 and 2-46.

#### Connecting Facilities and Supporting Amenities

Figures 2-12a and 2-12b in Draft EIR Chapter 2.0, “Project Description,” pp. 2-53–2-54, show the proposed Bay Trail alignment through the project site. As indicated in these figures, there would be multiple access points to the Bay Trail on the India Basin Open Space and 700 Innes properties, including sidewalks and paved paths from New Hudson Avenue, Arelious Walker Drive, Spring Lane, Beach Lane, and Earl Street. Additionally, the Bay Trail would be accessible via various paths and trails within the India Basin Shoreline Park and 900 Innes properties. The specifics of the Bay Trail design, including dimensions, precise alignment, and bicycle parking accommodations, are still under refinement.

Although the precise locations of bicycle parking and wayfinding locations will depend on the final detailed design of the transportation infrastructure and adjacent buildings, the proposed project and variant would generally provide publicly accessible bicycle parking and wayfinding signage to and from destinations within the project site. As stated in Draft EIR Chapter 2.0, “Project Description,” pp. 2-58–2-59, “[t]he proposed project would provide 1,343 Class 1 bicycle parking spaces (such as bike lockers or secure bike rooms) and 163 Class 2 bicycle parking spaces (traditional, publicly accessible bicycle racks). The variant would provide 745 Class 1 bicycle parking spaces and 164 Class 2 bicycle parking spaces.” The proposed Class 2 bicycle parking spaces would predominantly be located within the sidewalk furnishing zone along New Hudson Avenue and Arelious Walker Drive, as shown in Figure 2-13b of the Draft EIR (pp. 2-56). As noted on Draft EIR p. 2-59, the proposed project and variant would include “directional signage for locating transportation services (shuttle stop) and amenities (bicycle parking).” Additionally, Subsection C, “Summary of Revisions to the BUILD Development,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” describes the revised proposed project’s additional bicycle parking spaces.

#### Text Changes to the EIR

In response to this comment the following text change has been made to the project description, on Draft EIR p. 2-59, to provide further clarity on multimodal signage as it relates to the Bay Trail:

Multimodal Wayfinding Signage: Provide directional signage for locating transportation services (shuttle stop), regional bicycle and pedestrian facilities (Bay Trail), and amenities (bicycle parking).

In response to the updated information provided by ABAG in the comment, the referenced paragraph in Draft EIR Section 3.5, “Transportation and Circulation,” on p. 3.5-23 has been changed as follows:



“The Association of Bay Area Governments (ABAG) administers the *San Francisco Bay Trail Plan* (Bay Trail Plan). The Bay Trail is a multipurpose recreational trail that, when complete, would encircle San Francisco and San Pablo bays with a continuous ~~400~~500-mile network of bicycling and hiking trails; ~~338~~354 miles of the alignment have been completed to date. ABAG’s 2005 Gap Analysis Study (ABAG, 2005) attempted to identify the remaining gaps in the Bay Trail system; classify the gaps by phase, county, and benefit ranking; develop cost estimates for individual gap completion; identify strategies and actions to overcome gaps; and present an overall cost and time frame for completion of the Bay Trail system.”

These text changes do not change any of the conclusions made in the Draft EIR.

## **COMMENT TR-2: VEHICLE MILES TRAVELED METHODOLOGY AND FINDINGS**

- **O-GA2-7**
- **O-IBNA-8**
- **O-PBNA-1**

“VII. Transportation and Circulation: Section 3.5

The DEIR’s conclusion in Section 3.5 that ‘The proposed project or variant would not cause substantial additional VMT or substantially induce automobile travel’ and that the impact would be ‘Less than significant’ is clearly incorrect. The impact will be significant and unavoidable as the India Basin project would bring thousands of people to the residential and commercial developments on a daily basis - and a large number of these individuals will travel by automobile. No amount of traffic control, shuttles, or even public transportation improvements will be able to reduce this impact to less than significant.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-7]*)

---

“3.5 Transportation and Circulation

Impact TR-1: The proposed project or variant would not cause substantial additional VMT or substantially induce automobile travel. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact TR-1 would have a less than significant CEQA impact.

The proposed 55 bus line is inadequate, only getting residents as far as 3rd Street. With such a poor bus line, it may be safely assumed that residents will find that frustrating and would simply resort to using their personal cars for transportation. This plan does not address what has happened as a result of the new Shipyard development: a dramatic increase in VMT as new residents use their own cars as primary transportation. We suggest a traffic measuring test to determine the true number of cars traveling along Innes Avenue through the project area. A better mitigation would be to leave the 19 bus line as it is, and add a 19 Express bus that does not go up to Hunter’s View or Potrero Hill, and travels on the 101 Freeway to the 9th Street exit and from there continue the

regular route to Larkin Street and beyond.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-8]*)

---

“The Potrero Boosters Neighborhood Association (the “Boosters”) has several questions and comments related to the Draft Environmental Impact Report (“DEIR”) for the India Basin Mixed Use Project (the “Project”). Given the Project’s proximity to the Potrero Hill and Dogpatch neighborhoods, we are keenly interested in ensuring that traffic and transportation impacts are effectively mitigated.” (*J.R. Eppler, President, Potrero Boosters Neighborhood Association, Letter, October 30, 2017 [O-PBNA-1]*)

## **RESPONSE TR-2**

The comments cite concerns related to the methodology used to assess transportation impacts of the proposed project and variant related to vehicle miles traveled (VMT), including project-specific analysis and thresholds of significance for additional VMT. The comments allege that the VMT analysis in the EIR is inadequate because of misapplication of the VMT metric. The comments also suggest that the proposed project or variant would cause substantial additional VMT because existing bus service in the project area is inadequate. The comments state that because the project area has inadequate transit service, new residents would choose to use private automobiles as their primary transportation mode, causing a substantial increase in VMT.

### Summary of VMT Impacts

California Senate Bill 743 requires the Governor’s Office of Planning and Research (OPR) to establish criteria for determining the significance of transportation impacts that shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses. As part of developing these criteria, the statute calls for OPR to recommend potential metrics for evaluating transportation impacts, such as VMT. VMT is a measure of the volume of automobile traffic and the associated distance traveled in those automobiles. For the purposes of analyzing transportation impacts, VMT is one measure of the level of automobile use associated with potential users (e.g., residents, tenants, employees, and visitors) of a project.

On March 3, 2016, the San Francisco Planning Commission adopted Resolution 19579, which replaced automobile delay (as measured by vehicular level of service, or LOS) with VMT for the purposes of evaluating transportation impacts. This approach to evaluating transportation impacts is described on Draft EIR p. 3-2. Additional detail on the Planning Department’s methodology, analysis, and recommendations for VMT analysis are provided in Attachment F of the March 3, 2016 staff report to the Planning Commission (Methodologies, Significance Criteria, Thresholds of Significance, and Screening Criteria for Vehicle Miles Traveled and Induced Automobile Travel Impacts, which includes an appendix from the San Francisco County Transportation Authority).

The Planning Department’s approach to VMT analysis under CEQA is based on a VMT population efficiency metric that considers average daily VMT per person, as opposed to an approach based on total (absolute) VMT. Specifically, the Planning Department’s approach focuses on average daily VMT per capita (for residential uses) or per employee (for retail and office uses). A screening analysis is conducted to compare the average daily VMT

for each use proposed by a project (in the transportation analysis zone in which the given project is located) to the corresponding regional average. This approach was recommended by OPR in a technical advisory that accompanied its January 2016 draft CEQA guidelines (*Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA*, or “proposed transportation impact guidelines”). Consistent with OPR recommendations, the Planning Department uses maps illustrating areas of San Francisco that exhibit low levels of existing and future VMT to screen out developments that may not require a detailed VMT analysis. The Planning Department relies on the San Francisco Chained Activity Model Process (SF-CHAMP) model runs prepared by the San Francisco County Transportation Authority to estimate average daily VMT by use for different areas of San Francisco.

As described on Draft EIR pp. 3.5-33–3.5-34, impacts related to substantial additional VMT are evaluated using screening criteria based on a threshold of 15 percent less than the corresponding regional average VMT per capita (for residential projects) or per employee (for retail and office projects). Projects not exceeding these thresholds are presumed to not generate substantial additional VMT. This approach is consistent with CEQA Section 21099 and the thresholds of significance 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. As documented in OPR’s proposed transportation impact guidelines, a threshold for average daily VMT per capita/employee that is 15 percent below the corresponding regional averages for existing development is “both reasonably ambitious and generally achievable.”

Impact TR-1, on Draft EIR p. 3.5-46, and Impact C-TR-1, on Draft EIR p. 3.5-86, present the assessment of VMT impacts of the proposed project or variant for existing and cumulative conditions, respectively. The project site is located within an area of San Francisco where the existing and projected future cumulative average daily VMT per capita for the proposed land uses are less than the corresponding regional VMT thresholds minus 15 percent, and therefore neither the proposed project nor the variant would generate a substantial increase in VMT. Furthermore, transportation-related design features of the proposed project or variant (including, but not limited to, a Class I bikeway parallel to Innes Avenue, enhanced pedestrian connections, on-street commercial and passenger loading zones, and curb cuts) fit within the general types of changes that would not substantially induce automobile travel. In accordance with the aforementioned State and City guidance, the VMT impacts of the proposed project or variant are therefore considered to be less than significant.

#### Total VMT Increase

As described above, the Draft EIR determines that VMT impacts of the proposed project or variant would be less than significant based on the established significance thresholds, which reflect VMT as measured through population efficiency (i.e., average VMT per capita/employee), consistent with State and City guidance. This determination, however, is not an indication that the proposed project or variant would not generate any additional VMT. In particular, individual land use projects cannot feasibly result in zero VMT without substantial changes in variables that are largely outside the control of a developer (e.g., large-scale transportation infrastructure changes, social and economic movements).

The thresholds of significance that the department uses for VMT analysis meet the criteria of Senate Bill 743: they demonstrate whether a development is in a transportation-efficient location in the region, with safe and

adequate access to a multi-modal transportation system and key destinations, and whether the development will help the city, region, and state reach their greenhouse gas reduction targets.

The commenters are essentially proposing an automobile capacity metric (e.g., vehicular LOS), the former metric that the City used and subsequently abandoned in favor of the VMT metric after passage of Senate Bill 743 and Planning Commission Resolution 19579. However, as documented in the March 3, 2016, Planning Commission staff report, the use of vehicular LOS criteria encourages harmful sprawl development. Sprawl development adds a substantial number of vehicles and greater distances of vehicle travel onto the overall regional transportation system, but has little to no vehicular LOS impacts. Conversely, infill development, such as the proposed project or project variant, adds a substantially lower number of vehicles and shorter distance of vehicular travel onto the overall regional transportation system than sprawl development, but could have numerous vehicular LOS impacts. This was one among many reasons that the Planning Commission removed automobile delay as a significance criterion in CEQA through Planning Commission Resolution 19579, and full implementation of Senate Bill 743 will require all jurisdictions to do the same.

The proposed project or variant would be an infill site in an area where the average daily VMT per capita/employee for the proposed land uses is below the corresponding regional averages minus 15 percent, and would include a diversity of uses (such as residential, retail/restaurant, and office under the proposed project and variant, and also school uses under the variant only) and improvements to the multimodal transportation network that would contribute to achieving the overall goals of Senate Bill 743.

VMT thresholds based on population efficiency, as opposed to an absolute total increase in VMT, allow land use projects with different characteristics to be evaluated on an objective and equivalent basis. Alternatively, a threshold based on absolute total VMT would generally favor smaller projects (and consequently “penalize” larger projects), regardless of location—even on mixed-use infill sites well-served by or well-suited to multimodal transportation networks. This outcome would conflict with the goals of Senate Bill 743, which specifically includes mechanisms to modernize transportation analysis for transit-oriented infill projects and other projects that promote the “reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (as discussed on p. 3-2 of the Draft EIR).

The comment’s disagreement over the methodology used for assessing transportation including VMT impacts in this EIR is noted. However, a lead agency has substantial discretion in determining the appropriate threshold of significance to evaluate the severity of a particular impact. Where an agency’s methodology is challenged, the standard of review for a court reviewing the selected methodology is the “substantial evidence” standard, meaning the court must give deference to the lead agency’s decision to select particular significance thresholds, including the threshold for traffic impacts. This EIR’s use of a VMT population efficiency metric as a significance threshold consistent with established City standards is founded on the substantial evidence set forth in the materials supporting Resolution 19579, described above. Accordingly, further study of VMT-related impacts of the proposed project or variant is not required.

### Bus Routes

One comment suggests that the project or variant would cause substantial additional VMT because existing bus service in the project area is inadequate. The comment states that the inadequate service will cause a dramatic

increase in VMT, because new residents would not have a viable alternative to using their own cars as their primary means of transportation. The comment specifically references the 55 16th Street bus route, which currently operates along 16th Street between Mission Street and Third Street and is not located near the project site (it is over 2 miles from the project site). No changes are proposed to this route to realign service to be closer to the project site. However, other San Francisco Municipal Railway (Muni) bus routes (including the 19 Polk, 44 O'Shaughnessy, and 54 Felton) currently serve the project site, as discussed in Draft EIR pp. 3.5-8–3.5-12.

As discussed above in the section “Summary of VMT Impacts,” average daily VMT for the project is estimated using the SF-CHAMP travel demand forecasting model, which includes inputs to reflect the proximity and quality of transit services, together with other characteristics of the transportation network. Therefore, the VMT screening analysis conducted for the Draft EIR adequately reflects the availability and attractiveness of transit service to/from the project site. The estimates of average daily VMT from SF-CHAMP show that neither the proposed project nor the variant would generate a substantial increase in VMT under existing or future (cumulative) conditions, and the Draft EIR concludes that VMT impacts would be less than significant.

Regarding the adequacy of existing and future transit service to/from the project site, the 19 Express bus line mentioned in one of the comments is similar to the Hunters Point Express (HPX) bus line, which is planned for implementation as part of the *Candlestick Point & Hunters Point Shipyard Phase II Transportation Plan* (CPHPS Transportation Plan). The HPX will operate along Innes Avenue, with a stop at Innes Avenue/Arelious Walker Drive adjacent to the project site, before traveling express via U.S. 101 to downtown San Francisco. Based on the most recent phasing plan for the CPHPS project, HPX service is anticipated to begin in 2021 and would serve similar ridership patterns as would the suggested 19 Express bus line. Therefore, the suggested 19 Express line would be redundant and, as such, unnecessary. The HPX is already considered as part of the cumulative impact analysis, which begins on p. 3.5-81 of Draft EIR Section 3.5, “Transportation and Circulation.” This cumulative analysis includes the full buildout of Hunters Point Shipyard and implementation of the proposed project or variant. It also incorporates analysis of two different scenarios regarding implementation of components of the IBTAP, limited to streetscape improvements that would not affect transit service.<sup>38</sup>

As suggested in the comment, future implementation of the HPX and other transit service improvements (as part of the proposed project or variant and as part of the CPHPS project) would substantially improve transit service in the India Basin area and surrounding neighborhoods and provide travel options to area residents and visitors outside of private automobiles. Overall, the Draft EIR concludes that the cumulative transit capacity impact is less than significant, and therefore no transit capacity mitigation measures are proposed or required under CEQA for cumulative conditions. Furthermore, the estimates of future average daily VMT per capita already reflect the availability and attractiveness of planned transit improvements such as the HPX, and show that VMT impacts of the proposed project or variant would also be less than significant.

Transit impacts associated with the proposed project and variant under baseline conditions, prior to implementation of the HPX and other transit improvements under the CPHPS Transportation Plan, are discussed in Draft EIR pp. 3.5-50–3.5-62. The Draft EIR identifies significant transit capacity impacts under both the

---

<sup>38</sup> The IBTAP is not an approved plan and has not undergone required environmental review. Some of the changes proposed in the IBTAP have been specifically incorporated as part of the proposed project or variant (as described in the Draft EIR, pp. 3.5-44–3.5-45) and are analyzed in the Draft EIR accordingly. The remaining changes are considered separately under the cumulative analysis (as described in the Draft EIR, pp. 3.5-83–3.5-85).

proposed project and the variant, and describes mitigation measures to reduce these impacts to less-than-significant levels. Mitigation Measures M-TR-3P, “Implement Transit Capacity Improvements (Proposed Project),” and M-TR-3V, “Implement Transit Capacity Improvements (Variant),” require that the project sponsors of the 700 Innes property fund temporary transit service improvements in the vicinity of the project site until the HPX and other transit improvements identified in the CPHPS Transportation Plan are in operation. These measures would provide additional transit options to area residents and visitors on a temporary basis until permanent improvements are implemented under the CPHPS Transportation Plan.

No changes to the EIR are required in response to this comment.

#### Near-Term Traffic Patterns

One comment claims that the Draft EIR does not address the effects of the Shipyard development and recommends a “traffic measuring test” to determine actual traffic volumes along Innes Avenue. The Baseline scenario analysis includes traffic volumes on Innes Avenue that reflect existing conditions at the time the EIR’s Notice of Preparation was issued, as well as traffic from additional development that was approved and under construction at that time (i.e., Shipyard Phase 1). Therefore, the baseline scenario contains an assessment of near-term traffic patterns, similar to that requested in the comment (“traffic measuring test”). Similarly, the cumulative scenario analysis includes traffic associated with full buildout of the Shipyard project and other reasonably foreseeable development within the area, city, and region. Therefore, the analysis fully considers traffic along Innes Avenue in the vicinity of the project site under both near-term and long-term conditions, and additional assessment of traffic volumes is not required. In addition, as stated above under the heading “Total VMT Increase,” on p. 5-48 of this document, the use of vehicular LOS criteria encourages harmful sprawl development and was abandoned as a transportation metric by the planning department as documented in the March 3, 2016, Planning Commission staff report. Sprawl development adds a substantial number of vehicles and greater distances of vehicle travel onto the overall regional transportation system, but has little to no vehicular LOS impacts.

It should also be noted that both baseline and cumulative conditions include a number of street and transit service changes under the CPHPS Transportation Plan, *Hunters Point Shipyard II Infrastructure Plan*, the IBTAP, and other plans (as described in further detail in Draft EIR pp. 3.5-28–3.5-31 and 3.5-81–3.5-85). In addition, the Draft EIR identifies several mitigation measures for the proposed project or variant, including Mitigation Measures M-TR-3P and M-TR-3V (which require funding temporary transit capacity improvements) and Mitigation Measure M-C-TR-2 (which requires implementation of transit-only lanes).

These mitigation measures and the improvements specifically included in the proposed project or variant, along with the improvements identified in the CPHPS Transportation Plan and many of the other plans described above, would be tied to build-out of specific development phases, total travel demand, or other triggers associated with the CPHPS project and with the proposed project or variant. Therefore, transportation improvements to support transit and other modes (bicycling and walking) would be directly linked to build-out of the anticipated development at the Shipyard site and the project site, achieving an effect similar to the recommendations in the comment for a “traffic measuring test” and associated improvements to transit service. No changes to the EIR are required in response to this comment.

**COMMENT TR-3: TRANSIT CAPACITY IMPACTS**

- **O-IBNA-9**

“Impact TR-3: The proposed project or variant would cause a substantial increase in transit demand that would not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service. CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.

IBNA disputes that Impact TR-3 would have a less than significant CEQA impact after Mitigation Measures.

Re: Transportation and Circulation Table 3.5-26: There has not been adequate explanation or suggested mitigation to property owners, residents, and businesses in the area of impact about the cumulative street network changes of the proposed project as described in Table 3.5-26. IBNA requests specific community outreach and input concerning changes to transportation, transit, and circulation.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-9]*)

**RESPONSE TR-3**

The comment disputes the conclusions presented in the discussion of transit capacity impacts under Impact TR-3 on pp. 3.5-50 through 3.5-62 of Draft EIR Section 3.5, “Transportation and Circulation,” referencing the cumulative street network changes summarized in Table 3.5-26 of the Draft EIR. As indicated in Table 3.5-26 and the accompanying discussion on pp. 3.5-83 through 3.5-84, the referenced street network changes involve changes to the configuration of the public right-of-way along the Jennings Street–Evans Avenue–Hunters Point Boulevard–Innes Avenue corridor under the Cumulative Conditions time frame. Impact TR-3 provides an analysis of Baseline plus Project conditions related to transit capacity, which reflect transportation conditions at the time of the Notice of Preparation of an EIR with the addition of changes as a result of the proposed project. The comment refers to cumulative street network changes summarized in Section 3.5, and these anticipated changes were accounted for in the cumulative analysis under Impact C-TR-1. Cumulative analysis for the purpose of CEQA addresses the potential for combined effects from the project in combination with reasonably foreseeable other development in the area. The Draft EIR’s analysis or conclusions regarding project-specific transit capacity impacts under Baseline plus Project Conditions for the proposed project or variant is appropriately distinguished from the analysis of transit impacts under the cumulative scenario. However, a response to each of these concerns (transit capacity impacts and cumulative street network changes) is provided below.

Summary of Transit Capacity Impacts

The Draft EIR analyzed potential transit capacity impacts to both local and regional transit, finding that the proposed project would result in significant impacts to the 44 O’Shaughnessy and that the variant would result in significant impacts to both the 19 Polk and the 44 O’Shaughnessy. The Draft EIR identified two mitigation measures, Mitigation Measures M-TR-3P, “Implement Transit Capacity Improvements (Proposed Project),” and M-TR-3V, “Implement Transit Capacity Improvements (Variant),” which require either funding temporary transit service improvements or implementing a temporary shuttle service, to mitigate these impacts to a less-than-significant level. These measures would temporarily increase the capacity of transit services serving the project site until the HPX and other transit improvements identified in the CPHPS Transportation Plan are in operation.

Although the comment disputes the Draft EIR finding regarding this impact, the comment has not provided any substantial evidence to demonstrate that the Draft EIR conclusions are incorrect. No further response regarding the transit capacity impacts of the proposed project or variant is required.

### Cumulative Street Network Changes

Regarding the comment's request for specific community outreach and input for the identified changes to the street network under cumulative conditions, there has been extensive public outreach for potential transportation improvements in the India Basin area as part of various plans and projects, beginning with the CPHPS Transportation Plan and the India Basin Neighborhood Association Vision Plan in 2010. Many of the proposals and recommendations identified in these plans and projects were subsequently incorporated into the draft IBTAP, published in 2015. The India Basin Neighborhood Association will continue to be apprised of future community outreach efforts in the India Basin area. As described in Draft EIR pp. 3.5-83–3.5-84, the street network changes identified in Table 3.5-26 are based on the changes already planned under the CPHPS Transportation Plan, as well as potential additional changes proposed under the IBTAP. Community workshops for the IBTAP were held on January 27, 2015, and March 19, 2015. Draft recommendations were presented to the Planning, Development & Finance Subcommittee of the Hunters Point Shipyard Citizens' Advisory Committee (HPSCAC) on June 4, 2015, and the final plan was presented at the HPSCAC's full committee meeting on July 13, 2015.

Therefore, a substantial amount of public outreach for many of the cumulative street network changes has already been conducted. One example of public input shaping the direction of the street network changes involves the proposed relocation of the bike path from Innes Avenue to New Hudson Street under the proposed project or variant, which was in response to public preference for retaining parking on Innes Avenue instead of providing a bicycle facility there.

As described on p. 3.5-83 of Draft EIR Section 3.5, "Transportation and Circulation," the IBTAP improvements summarized in Table 3.5-26 have not been approved and may require further environmental review before implementation, and it is likely that additional outreach and design refinement will be conducted if and when a decision is made to move forward with individual plan components. The Draft EIR's analysis of Cumulative plus Project Conditions impacts specifically considers multiple streetscape scenarios (two with the IBTAP and one without the IBTAP) to address the uncertainty regarding these improvements.

It should be noted that the Draft EIR (pp. 3.5-99–3.5-100) identifies a significant cumulative transit delay impact to transit service in the Evans Avenue–Hunters Point Boulevard–Innes Avenue–Donohue Avenue corridor. Mitigation Measure M-C-TR-2, "Implement Transit-Only Lanes," would require that SFMTA convert one of the two travel lanes in each direction of the corridor from a mixed-flow lane to a transit-only lane between the Jennings Street/Evans Avenue/Middle Point Road and Donahue Street/Robinson Street intersections.<sup>39</sup> Therefore, this mitigation measure would result in a street design along Innes Avenue that is a departure from those presented as part of the IBTAP. The identification of this mitigation is a direct result of the environmental review process that is currently underway and was, therefore, unable to be disclosed to the public prior to the beginning

---

<sup>39</sup> This mitigation measure would reduce the cumulative contribution of the proposed project or variant to this transit delay impact to a less-than-significant level. However, the Draft EIR conservatively determined that this impact would remain significant and unavoidable with mitigation because the SFMTA cannot commit to implement the identified improvements at this time.



of the Draft EIR public review and comment period. Given that this mitigation measure would result in the replacement of two mixed-flow lanes with transit-only lanes (one in each direction), implementation of this mitigation measure could affect traffic congestion in the vicinity of the project site. However, the Draft EIR determined that the secondary environmental impacts of this mitigation would be less than significant, as discussed on p. 3.5-99. No changes to the EIR are required in response to this comment.

#### **COMMENT TR-4: LOADING IMPACTS**

- **O-IBNA-10**

“Impact TR8: Under either the proposed project or variant, passenger loading demand associated with the school during the peak hour of loading activities would not be accommodated within proposed on-site passenger loading facilities or within convenient on-street loading zones, and would create potentially hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit. CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.

IBNA disputes that Impact TR-8 would have a less than significant CEQA impact after Mitigation Measures.

A school, once reaching 22 students will create a hazard, but housing with potentially thousands of residents will not? We find this absurd and needing further examination.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-10]*)

#### **RESPONSE TR-4**

The comment requests that the findings in the Draft EIR related to loading be further examined.

The Draft EIR separately considers loading impacts associated with several different activities, including goods delivery, passenger loading activity, and school trip pick-ups/drop-offs. Because the proposed project and variant consist of a mix of land uses including residential, commercial, retail, school (variant only), and open space, consideration was given to each of the various applicable uses in determining the overall commercial and passenger loading demand associated with the proposed project and variant. As discussed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document, the revised proposed project eliminates the school from the project. Passenger loading activities for the proposed school use under the variant was separated because of the unusual peaking characteristics associated with student pick-up/drop-off. Specifically, student pick-up/drop-off activities are concentrated at a specific location (the school) within specific time windows (immediately before school starts and after school ends), and warrant being analyzed separately from other loading activities. Loading impacts associated with the proposed residential use, however, are addressed together with the other components of the land use program (commercial, retail, and open space).

As noted above, since publication of the Draft EIR, one of the project sponsors (BUILD) has initiated revisions to the proposed project that would increase the number of residential units, reduce the commercial square footage in the 700 Innes property, and replace the school with residential space. The environmental impacts caused by the revised proposed project are analyzed in Subsection D, “Environmental Analysis of the Revised Proposed Project,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project.”

The Draft EIR includes forecasts of loading activity compared to the proposed loading supply for the proposed project and variant. The Draft EIR describes the adequacy of proposed loading supply in Impact TR-7 in Section 3.5, “Transportation and Circulation,” on pp. 3.5-71–3.5-73, where the text states that during peak periods, the project’s loading supply would be adequate to meet expected demand, except for that associated with the school, as further discussed below. Note that the school is no longer included under the revised proposed project. The proposed project would have a freight/service vehicle demand of 16 spaces during the peak hour, which would be accommodated by a supply of 16 spaces. The variant would have a freight/service vehicle demand of 25 spaces during the peak hour, which would be accommodated by a supply of 25 spaces. Additionally, four on-street loading zones are proposed to accommodate passenger loading demand. The Draft EIR assumes that these on-street zones would be dual use; i.e., used for both passenger loading and goods/delivery loading.

Therefore, the analysis in the Draft EIR demonstrates that the non-school uses of the proposed project and variant (which includes the residential component) would experience a demand for loading during peak periods that can be accommodated by the proposed supply, and concludes that these loading impacts would be less than significant. The Draft EIR also identifies Improvement Measure I-TR-7, “Implement an Active-Loading Management Plan,” in Section 3.5, “Transportation and Circulation,” on pp. 3.5-73–3.5-74. This improvement would further alleviate loading impacts of the proposed project or variant by facilitating efficient use of loading spaces using approaches such as scheduling deliveries, coordinating deliveries, and designing loading areas to accommodate secured unassisted deliveries, as needed.

In contrast, schools at the secondary (high school) level or lower, including the proposed school (variant only), generally exhibit a unique peaking pattern, because students have a relatively fixed class schedule and parents/guardians generally coordinate their drop-off/pick-up times to coincide with the start and end times of the school day. Based on a study of existing schools comparable to the school proposed at the project site, the Draft EIR conservatively concludes that the school should provide a passenger loading zone measuring approximately 185 feet in length, assuming a proposed enrollment of approximately 450 students. This recommended length reflects the appropriate amount of curb space to avoid double parking and other secondary effects of student pick-up/drop-off activities on background circulation. However, the proposed zone has only been designed in concept and is not yet finalized at this stage. In particular, the exact dimensions and location of the zone would require additional coordination with and approval from SFMTA. Therefore, the Draft EIR conservatively concludes that the passenger loading impact associated with the school use would be significant.

Mitigation Measure M-TR-8, “Implement Passenger Loading Strategies for the School,” included for the variant, only requires creation and enforcement of a pick-up/drop-off plan, provision of an adequately sized curbside loading zone, and other strategies to reduce the impact of school-related passenger loading to a less-than-significant level. These strategies have the preliminary endorsement of SFMTA because they have been successful across San Francisco in addressing the effects of school pick-up/drop-off activity on background traffic, transit, bicycle, and pedestrian circulation.

Accordingly, the Draft EIR adequately analyzed the applicable loading impacts of the proposed project and variant, including imposition of mitigation measures. No changes to the EIR are required in response to this comment.

In summary, because the revised proposed project no longer would include a school, as described and assessed in Subsection C, “Summary of Revisions to the BUILD Development,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” no impact would be associated with school passenger loading under the revised proposed project, and the significant impact and associated Mitigation Measure M-TR-8 for school passenger loading identified under the proposed project would not apply to the revised proposed project, but would remain in the Draft EIR for the variant.

#### **COMMENT TR-5: TNCS, CPHPS DATA, AND MODE SPLIT METHODOLOGY**

- **O-PBNA-2**
- **O-PBNA-3**
- **O-PBNA-4**
- **O-PBNA-5**

“We note that there is no mode analysis considering the impact of Transportation Network Companies (“TNCs”) on traffic and transit into and out of the Project site. Your analysis relies on outdated data from the American Community Survey Mode Choice Calculations from 2009 to 2013, which shows only 7.9% of travel from taxi, motorcycle, bicycle or other means.

This analysis is outdated by failing to consider TNCs altogether. That this mode of transit substantially impacts traffic and transit operations is not a secret—the City has acknowledged as much. In particular, the County Transportation Agency has recently examined the impact of TNCs, and the City Attorney’s office has demanded that TNCs provide data that will more accurately describe their impact.

Furthermore, the DEIR acknowledges that TNCs will be a part of mode split (while implying that the analysis cited above understates the use of alternative modes of transit), stating in the footnote on p. 152 that “because there are no proposed direct transit links to nearby Caltrain stations, transit passengers traveling to and from the South Bay are expected to utilize first/last mile services such as taxi, Transportation Network Companies (TNCs), or bicycling to access Caltrain.” Given the foregoing, what will be the impact of TNCs, and how shall these impacts be mitigated?” (*J.R. Eppler, President, Potrero Boosters Neighborhood Association, Letter, October 30, 2017 [O-PBNA-2]*)

---

“We further believe that an analysis that relies on (a) 2010 data in the short term (i.e., that is “based on the latest available Census mode split and place of employment information for the Census Tract surrounding the Proposed Project”); (b) an outdated long-term methodology (i.e., methodology that is “identical to that developed for the Candlestick Point/Hunters Point Shipyard analysis”); and (c) projections of transit use from historically transit-rich neighborhoods (i.e., the Sunset and Richmond Districts to downtown and back) is terminally flawed and self-contradicting.

The use of 2010 data for neighborhood mode split and place of employment introduces two flaws. First, the period around 2010 included the bottom of the economic cycle, which we can reasonably speculate had an

outsized impact on the census tracts in issue, both in terms of employment and transit usage. Use of such data to even describe current conditions would likely be flawed in describing both transit usage and employment trends.” (J.R. Eppler, President, Potrero Boosters Neighborhood Association, Letter, October 30, 2017 [O-PBNA-3])

---

“Second, there is no rational comparison between the India Basin population circa 2010 and the future residents of the Project, given the stark differences in the residential density, likely purchase or rental price point, and likely residential demographic. As can be inferred from your p. 125 footnote, the ratio of Downtown and Silicon Valley commutes will likely be far higher than anticipated, affecting impacts across mode splits. The Final Environmental Impact Report (“FEIR”) must consider a short-term model that reflects the reality of today’s conditions, and acknowledges the changes to the neighborhood inherent in the Project.

Use of Candlestick Point/Hunters Point Shipyard data will further impact transit and transportation predictions in the long run. The methodology devised for that particular project reflects the world of at least a decade past. Besides its failure to consider TNCs, such modelling fails to consider the cumulative effects of development along the southern and central waterfronts. These regions act as a coherent north-south transportation corridor, and will handle the largest brunt of the traffic and transit congestion generated by the Project (which, it should be noted, also has a substantial air quality impact to those freeway adjacent neighborhoods). The FEIR must consider long term modelling that anticipates the full buildout of the southern and central waterfronts and its impacts on traffic and transportation along the whole of the transportation corridor.” (J.R. Eppler, President, Potrero Boosters Neighborhood Association, Letter, October 30, 2017 [O-PBNA-4])

---

“Last, it is mindboggling that transit ridership data for the historically transit rich neighborhoods of the Sunset and the Richmond are being substituted for Bayview transit ridership. In both the Sunset and the Richmond, light-rail predated residential development and Sunset and Richmond residents self-selected into the neighborhood based on its presence. Even where those light-rail lines have been replaced, they have been replaced with a system of limited-stop or rapid bus lines.

In contrast, transit in the Bayview, to which the Project is adjacent, has been and remains unreliable. Yes, there is a promise of 8 minute peak headways along the T-Third line in the Bayview, but the Project is over half a mile away from that line. That line is further intended to serve increased ridership from the Shipyard, the Potrero Power Plant, Pier 70 and Mission Rock—a flood of new riders whose impact will have to be experienced first-hand. And while a rapid connector between the T-Third and the Project site is planned, there are concerns about its timing that make easy access to transit seem less than certain. The FEIR should better model transit ridership based on the probable resources of the adjacent area, and not wildly disparate neighborhoods.” (J.R. Eppler, President, Potrero Boosters Neighborhood Association, Letter, October 30, 2017 [O-PBNA-5])

## **RESPONSE TR-5**

These comments generally relate to how for-hire vehicles such as TNCs and their associated effects were accounted for in the transportation analysis. In addition, the comments question the use of CPHPS data and the

mode split methodology, as well as how the effects of cumulative development in the Southern and Central Waterfront were incorporated into the transportation analysis. The first comment states that the Draft EIR relies on outdated data related to TNCs and requests that TNCs be further evaluated. The second comment raises concerns over the appropriateness of retaining a methodology for mode split that was developed in 2009 for CPHPS EIR. This comment also questions the validity of other portions of the travel demand analysis, asserting that the Draft EIR uses transit mode share data based on other San Francisco neighborhoods and incorporates data from the year 2010 as an input into the assumed mode split and trip distribution estimates for the project. The third comment expands on concerns about the use of data from the CPHPS EIR and potential travel behavior differences between the existing and proposed development at India Basin. The comment also requests that the EIR consider full buildout of the southern and central waterfronts in the cumulative transportation impact analysis. Similar to the second comment, the fourth comment elaborates on concerns related to mode share data referenced from other neighborhoods and requests refinements to the transit ridership estimates.

### TNCs and Associated Effects

As noted on Draft EIR p. 3.5-4, SF-CHAMP, the travel demand model maintained by the City and County of San Francisco, is used to estimate VMT from private automobiles and taxis, the latter of which are a type of for-hire vehicle, like TNCs. The observed data within SF-CHAMP is from the years with the latest data available, 2010–2012. Since that time, the prevalence of for-hire vehicles has increased in San Francisco, mostly due to growth in the number of TNC vehicles. SF-CHAMP estimates the probability of driving based on automobile ownership, household income, and other variables. To the extent that people previously would have traveled in another personal or for-hire vehicle (i.e., taxi), but now travel using a TNC service, this would be accounted for in previous household travel surveys and thus would be accounted for in VMT estimates from SF-CHAMP.

Focusing on the localized level of the project site, TNCs represent a portion of the vehicle-trips generated by the proposed project or variant. At the macroscopic level, TNCs also represent a portion of the overall volume of automobile travel (including household automobiles, taxis, TNCs, delivery vehicles, and private buses), which is limited by the available roadway capacity. Roadway capacity is one of the key inputs to SF-CHAMP and the travel demand forecasting process in San Francisco. Although travel demand by household automobiles or TNC vehicles may increase in the future, the overall volume of automobiles on the roadway network is limited by the available capacity during peak periods of travel. Therefore, the capacity of a given roadway limits the volume of automobile traffic it can carry, regardless of whether those vehicles are household automobiles or TNCs.

Unfortunately, there is limited information as to how the introduction/adoption of TNCs affects travel behavior, including whether people using these services are making trips they would not otherwise make, or substituting a TNC ride for a trip they would otherwise make by personal automobile, taxi, transit, or another mode. The Census Bureau and other government sources do not include TNC vehicles as a separate travel mode category when conducting survey/data collection (e.g., American Community Survey, Decennial Census). Thus, little can be determined from these standard, widely-accepted sources for travel behavior data.

Furthermore, TNCs have generally avoided disclosing specifics of their business models (e.g., number of vehicles or drivers in their service fleet, miles driven with or without passengers, total passengers), except as may be required under California Public Utilities Commission regulation. Although operating agreements in some cities (e.g., Boston, New York City) include stipulations for public access to this data, as of the date of this response to

comments document, the California Public Utilities Commission and the TNCs have not provided this data in response to requests from San Francisco and other communities. The City is investigating ways to obtain this data, but only has access to TNC driver contact information at this time. The inability to access relevant data hampers the Planning Department's ability to fully assess the effects of TNCs on the city's transportation system and to identify related environmental impacts.

Notwithstanding these limitations, currently available research regarding the effects of TNCs is summarized below:

- The *TNCs Today*<sup>40</sup> report released by the San Francisco County Transportation Authority (SFCTA) in June 2017 provides some idea of TNC trip volumes, frequencies, and geographic coverage in San Francisco, although the study only looked at intra-SF trips (i.e., those that both started and ended within City limits from mid-November to mid-December 2016, excluding dates around the Thanksgiving holiday). The report, which compiled one month of pick-up and drop-off data for these trips, is an important milestone in understanding how many TNC trips are taking place in San Francisco, where and when the trips are taking place, and how much VMT these trips generate.

The report found that the highest concentration of TNC pick-ups and drop-offs occurs in Downtown and the northeastern core of the city, including North Beach, the Financial District, and South of Market. The report also indicates that between 130,000 and 188,000 daily TNC trips are made on weekdays, potentially increasing to as much as 220,000 or more daily trips on Fridays and Saturdays. This represents around 20 percent of local VMT (i.e., trips within San Francisco only) and 6.5 percent of total VMT (including regional trips). An increase in total VMT does not in and of itself constitute a significant impact on the environment, as CEQA criteria uses a VMT per capita efficiency metric (as discussed in more detail in Response TR-2). Employment and residential population in San Francisco have also substantially increased during the period considered in this study, so it is unclear if the VMT per capita/employee has increased.

In addition to omitting regional TNC trips to or from San Francisco, however, this study does not attempt to quantify mode shift or induced travel demand. For these reasons, the VMT estimates in the study, which only account for travel within the City, cannot be compared to the VMT results from the SF-CHAMP model used for the Draft EIR, which account for travel into, within, and out of the city. The report notes that the SFMTA and SFCTA will attempt to collect more data to study issues such as safety, congestion, and mode shift impacts of TNCs. At this time, however, it is unknown if sufficient data will be available to quantitatively document how TNC operations influence overall travel demand and conditions in San Francisco or elsewhere, including the loading demand or VMT impacts of the proposed project or variant.

- The UC Davis Institute of Transportation Studies published a report in October 2017 providing insights on the adoption, use, and travel behavior impacts of ride-hailing.<sup>41</sup> The study conducted a travel and residential survey of users in seven major metropolitan areas (Boston, Chicago, Los

---

<sup>40</sup> San Francisco County Transportation Authority, *TNCs Today*, June 2017.

<sup>41</sup> Clewlow, Regina R. and Gouri S. Mishra (2017). *Disruptive Transportation: The Adoption, Utilization, and Impacts of Ride-Hailing in the United States*. Institute of Transportation Studies, University of California, Davis, Research Report UCD-ITS-RR-17-07.

Angeles, New York, San Francisco, Seattle, and Washington, D.C.) from 2014 to 2016. A total of 4,094 completed survey responses were collected between the two surveys, with 2,217 from respondents residing in dense, urban neighborhoods and 1,877 from more suburban locations. The survey responses for this report were evenly distributed between the five metropolitan areas for Survey 1 (Boston, Chicago, New York, Seattle, and Washington, D.C.), with an oversampling of respondents for two metropolitan areas for Survey 2 (San Francisco and Los Angeles). This study is more representative of the population of metropolitan areas than previous studies, but is a survey of user preferences (i.e., stated preference), as opposed to observed behavior.

The results of the survey identified that 21–30 percent of adults use TNCs. Of this percentage, 24 percent of the adults use TNCs on a weekly or daily basis. In other words, only approximately one quarter of adults use TNCs and only approximately one quarter of those adults use TNCs semi-regularly or regularly, but not necessarily for all trips. The study states that absent a ride-hailing (i.e., TNC) option, people would not have made 49–61 percent of trips at all (i.e., induced travel), or people would have made these trips via transit, bike, or foot instead (i.e., mode change). Specifically, the study concluded that TNC use attracts riders away from bus and light rail services (such as Muni), but serves as a complementary mode for commuter rail services (such as Caltrain). This conclusion supports the assertion in the cited reference from the transportation impact study (Draft EIR Appendix D p. 152) that transit passengers traveling to and from the South Bay are expected to utilize TNCs as one mode to access Caltrain.

TNC operations also involve some amount of “deadheading” miles (i.e., miles driven without passengers). Although the researchers do not attempt to quantify VMT from induced travel, mode change, or deadheading, the researchers conclude that TNCs are currently “likely” to contribute to growth in VMT in cities.

The report also states that there is an increasing data gap between privatized mobility operators and those in the public sphere who make critical short-to-long range transportation planning and policy decisions. As private mobility services providers continue to rapidly expand service, they gather massive amounts of data about how people move in cities—data that, for the most part, are unavailable to transportation planners. Limited data in the public sector perpetuates less-informed decision making, which in turn results in transportation systems that do not meet the public’s needs.

There are several potential solutions for bridging the data gap: 1) mandated data-sharing for mobility operators that use public infrastructure (i.e. roads); and 2) investment in more frequent data collection efforts. The New York Taxi & Limousine Commission approved regulations requiring companies like Uber and Lyft to share detailed data on rides in New York City.<sup>42</sup> Provided they are sufficiently anonymized, these data are essential for cities to make informed transportation planning and policy decisions. Given mobility operators’ use of public infrastructure, it is also reasonable for cities to require access to these data.

---

<sup>42</sup> Morris, D. Z. (February 5, 2017). “New York City Says Uber Must Share Ride Data.” *Fortune*. Retrieved from: <http://www.fortune.com>.

Research that harnesses data directly from ride-hailing providers may shed light on the utilization, demographics, and miles traveled of these services, but the more complex decisions that individuals and households make over time require continued data collection efforts through representative samples of the population. Given the pace of innovation in the transportation sector, data collection and analysis efforts to understand travel decisions are currently insufficient.

- The SFMTA recently released a 2017 Travel Decisions Survey,<sup>43</sup> a stated preference survey (via telephone) of 804 Bay Area residents aged 18 and older, conducted February–April 2017. The primary goal of the study was to determine mode share for trips to, from, and within San Francisco to evaluate progress towards achieving SFMTA’s Strategic Objective 2.3, which calls for a combined mode share target of 50 percent for all modes other than private automobiles. A comparison with past travel decision surveys for 2013 through 2017 found that fewer than 50 percent of trips have been made by automobiles (i.e., including TNCs) in every year since 2013, and that total private vehicle mode share (i.e., excluding TNCs) has decreased from 48 percent of trips to 43 percent of trips since 2013. The comparison also shows that while TNC trips have increased from 2 percent in 2014 to 4 percent in 2017, the overall automobile mode share has stayed at approximately 45–47 percent during these years. This effort concluded that since the last fiscal year (2015–2016), the number of driving trips declined from 1.9 million to 1.8 million, even as San Francisco saw a 2 percent overall increase in the number of trips (made by any means) to 4.1 million.

Although these studies provide useful information about the effects of TNCs, many details regarding how TNCs fit into the larger transportation picture in San Francisco remain unclear due to lack of access to the relevant data.

Although the effects of TNCs on the VMT estimates from SF-CHAMP are unknown at this time, it is unlikely that the VMT estimates would increase to such a level that the VMT impacts of the proposed project or variant would be significant. As discussed on Draft EIR pp. 3.5-46–3.5-47 and 3.5-86, the project site is located within an area where the existing and future average VMT per capita/employee for the proposed land uses is less than the corresponding regional averages minus 15 percent. To trigger new significant impacts related to VMT under the baseline scenario, project VMT would need to increase by 62 percent for residential trips, 6 percent for office trips, and 56 percent for retail trips. The same percentages for the cumulative scenario would be 65 percent, 93 percent, and 71 percent, respectively. This magnitude of change would require substantial shifts to TNCs from bicycling, transit, and other modes.

No studies have yet been able to quantify the net change in VMT from TNC use; therefore, no substantial evidence exists to quantify how the VMT analysis in the Draft EIR would need to change in response to these trends. Until very recently, even preliminary information about how TNCs operate was not known and could not have been known for the reasons stated above. As of the publication of this RTC document, there are not sufficient data available to draw conclusions about the effects of TNCs on the analysis of transportation impacts for the proposed project or variant; any further analysis would be speculative and, therefore, requires no further discussion pursuant to CEQA Guidelines Section 15145.

---

<sup>43</sup> Corey, Canapary, & Ganalis Research. SFMTA Travel Decisions Survey 2017 Summary Report.



Section 15384 of the CEQA Guidelines further prohibits a lead agency from using speculation to substantiate its findings or conclusions. Because the City currently lacks sufficient data to analyze the influence of TNCs on overall travel conditions in the City (including, for example, data regarding mode splits), the effects of TNCs on transportation are considered speculative, and, pursuant to the CEQA Guidelines, should not be considered in making an impact determination. Accordingly, under CEQA's mandate to avoid engaging in speculation or using speculation to substantiate conclusions, the City's approach to the issue is correct. The Draft EIR relies on the best information available about the existing and future travel patterns at the time of publication to provide the public and decision makers with the best information possible on which to evaluate the proposed project or variant.

#### CPHPS Data and Mode Split Methodology

Typically, transportation impact analyses conducted in the City and County of San Francisco rely on mode split percentages provided in the *Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)* published by the Planning Department. These mode share data are based on several factors including the land use associated with the given trip, the type of trip (e.g., work trip, non-work trip), and project location (in this case, Superdistrict 3). However, the specific characteristics and geographical/transportation context of the site warranted development of project-specific mode split assumptions in lieu of use of the *SF Guidelines* data.

In particular, the location of the project site away from the City center and at the eastern edge of the superdistrict makes it sufficiently different from the remainder of Superdistrict 3 in properties that influence mode split (such as proximity to rail transit and quality of transit service). Major developments and changes to the transportation network planned in the immediate vicinity of the proposed project and surrounding area also necessitated a project-specific mode share assessment that dynamically forecasts travel behavior changes at the project site in the context of these other changes. These changes include the buildout of the Shipyard site (both Hunters Point Shipyard Phase 1 and the CPHPS project) and implementation of the CPHPS Transportation Plan, which includes substantial improvements to transit service in the area. These differences necessitated development of project-specific mode splits for both baseline and cumulative scenarios, as explained on Draft EIR pp. 3.5-38–3.5-39.

These mode split assumptions are primarily based on the transportation analysis conducted for the CPHPS EIR. The approach used for the CPHPS EIR involved the creation of a mode choice model, calibrated using observed data from across San Francisco. The model was constructed to predict transit mode shares by determining the correlation between a number of variables that may influence mode choice throughout San Francisco, including drive time, parking cost, average wait for transit, transit travel time, and number of transfers for transit.

The data set used to construct the model was published in the 2000 Bay Area Travel Survey and also included information from U.S. Census Journey-to-Work data. The model was also constructed using data from a handful of other San Francisco neighborhoods, chosen because they are each outlying areas of the city somewhat similar to India Basin, Candlestick Point, and Hunters Point Shipyard, but with enough differences to draw meaningful distinctions between observed travel behavior and changes in levels of transit service and accessibility. The selected areas are the Richmond, the Outer Mission, the Hill Districts (i.e., West Portal and Monterey Heights), and the Sunset.

The transit mode shares for residents in the Richmond and Sunset neighborhoods commuting into Downtown for daily work trips are 73 percent and 68 percent, respectively, whereas the equivalent project mode share for these trips is 75 percent. These results are consistent with the quality of future transit connections between the project site and Downtown, which would be similar to, but slightly better than, for most areas of the Richmond and the Sunset. In particular, the HPX would provide a service similar to the “Richmond Expresses” (i.e., the commute-period express buses operating between the Financial District and the Richmond along the California Street, Geary Boulevard, and Balboa Street corridors) mentioned in the comment (“a system of limited-stop or rapid bus lines”). Residents at the project site, however, would benefit from having a stop directly adjacent to the project site at Innes Avenue/Arelious Walker Drive, as well as from a route that would have the non-stop (express) segment of the service begin and terminate immediately west of the site. Contrary to the comment, only a portion of the transit ridership generated by the proposed project or variant would be expected to use the T Third Street, as the HPX and east–west routes (44 O’Shaughnessy and 48 Quintara–24th Street) would provide more attractive alternatives for traveling to/from Downtown and making regional transit connections (e.g., BART), as indicated in Tables 3.5-28 and 3.5-29 and Tables 3.5-31 and 3.5-32 of the Draft EIR.

Although the Richmond and Sunset are transit-rich in comparison to India Basin as it currently exists, the proposed transportation network for India Basin by 2040 would be upgraded to the extent that it would be roughly comparable to these neighborhoods; therefore, these are reasonable neighborhoods to use as reference points for model calibration. In contrast to the claims made in the comment, the transit mode shares from these neighborhoods were not directly applied to the project, but instead used to calibrate a model that was then applied to the specifics of the project to forecast project-related travel behavior.

Since the creation of the mode split model in 2009, additional travel behavior data from more recent travel surveys has become available. In general, mode splits at the neighborhood scale may fluctuate over time in response to changes in variables used in the mode choice model (e.g., drive time, parking cost). In fact, data from the 2010 California Household Travel Survey (CHTS) indicates that transit mode share has increased somewhat from 2000 for trips between Downtown and the Richmond, the Hill Districts, and the Sunset. This does not suggest that the model is invalid; rather, this is likely explained by changes in model variables. For example, drive time may have increased with additional congestion or parking costs in Downtown may have increased between 2000 and 2010. There is no reason to suggest that the underlying relationships between variables and mode choice as calibrated in the model may have changed substantially since 2000, with the possible exception of the emergence of TNCs. However, as explained above in the “TNCs and Associated Effects” section of this response, data are not currently available to quantify the effects of TNCs on overall travel behavior. Therefore, the use of the selected mode choice model is reasonable and appropriate and no change to the analysis is warranted.

It should also be noted that the approach for estimating the project’s trip distribution did not ultimately use year 2010 data regarding place of employment as claimed in the comment. Instead, the analysis methodology incorporated model data to better capture foreseeable changes both in the vicinity of the project and across the region as a whole. Initially, the scope for the project’s transportation impact study (Draft EIR Appendix D) proposed use of 2008–2012 American Community Survey data to inform the project’s trip distribution. However, an alternative approach based on the trip distribution assumed for India Basin in the CPHPS EIR was ultimately selected. This trip distribution is based on outputs from the SF-CHAMP 2030 model run. The SF-CHAMP model provides a superior estimate of trip distribution to the U.S. Census (i.e., American Community Survey) data (for

existing residents) because it accounts for the precise location of the project within San Francisco, the anticipated growth in the regional employment market over the next decade, and proposed changes to the transportation network that would occur in the foreseeable future.

As documented in the CPHPS EIR, the trip distribution percentages predicted by the SF-CHAMP model for the transportation analysis zone containing the project site were compared with other sources of trip distribution data, including the regional travel demand forecasting model (maintained by the Metropolitan Transportation Commission), the *SF Guidelines*, and 2000 U.S. Census Journey-to-Work data. This comparison established that the use of the SF-CHAMP model data was reasonable and appropriate. Table 4-4 of the project's transportation impact study demonstrates the similarity between the SF-CHAMP 2030 and 2040 model runs, validating the use of the 2030 trip distribution data to model cumulative conditions in 2040 for the Draft EIR.

#### Cumulative Development in the Southern and Central Waterfront

In regard to the suggested inclusion of cumulative development in the Southern and Central Waterfront in the Draft EIR's analysis of transportation impacts, the Draft EIR already considers all reasonably foreseeable development projects and transportation projects across the city and region between the date of the EIR Notice of Preparation (June 19, 2016) and year 2040. Specifically, the Draft EIR considered a projection-based approach that accounts for background growth combined with a list of reasonably foreseeable development projects and transportation network changes for the cumulative analysis as allowed under CEQA Guidelines Section 15130. As described on Draft EIR pp. 3.5-81–3.5-83, the cumulative scenario specifically captures the combined effects of the San Francisco Bicycle Plan, Muni Forward, the Eastern Neighborhoods Rezoning and Area Plans, the CPHPS project, the SFPUC Southeast Treatment Plant construction projects (including new biosolids digester facilities and replacement of the headworks facility), the Blue Greenway/Bay Trail, Hunters View, Executive Park, and the Visitacion Valley/Schlage Lock redevelopment, among other projects. Although this list includes many of the projects in the vicinity of the project site in the southeastern quadrant of the city, the cumulative analysis also includes many current/ongoing or future plans and projects located further in the Central Waterfront area and beyond, including the Central SoMa Plan, the Transit Center District Plan and Transbay Redevelopment Plan, the Western SoMa Community Plan, the Mission Bay Redevelopment Plan (including the Warriors arena/event center and mixed-use development), Mission Rock (Seawall Lot 337 and Pier 48), and Pier 70 projects.

The Draft EIR considers the project's contribution to cumulative impacts caused by the cumulative effect of these projects. Through use of the SF-CHAMP model's VMT estimates for 2040, for example, the analysis of cumulative VMT impacts accounts for all of the aforementioned projects. Similarly, the analysis of cumulative transit capacity impacts (including the T Third Street) is based on ridership forecasts developed using the SF-CHAMP model and therefore accounts for all of these projects. For more localized effects related to transportation and circulation, the cumulative analysis also addresses the aforementioned projects where relevant (e.g., construction impacts and potential overlap with CPHPS and other projects). Therefore, no additional analysis of cumulative development in the Southern and Central Waterfront is warranted. No changes to the EIR are necessary in response to these comments.

## **G. Noise and Vibration**

The comment and corresponding response in this section relate to the topic of Noise, evaluated in Draft EIR Section 3.6. The comments are further grouped according to the following issues:

- NO-1: Noise Impacts in the Vicinity
- NO-2: Cumulative Noise Impacts

### **COMMENT NO-1: NOISE IMPACTS IN THE VICINITY**

- **O-IBNA-11**
- **O-GA2-8**

“3.6 Noise

Impact NO-2: Construction of the proposed project or variant would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. CEQA Impacts both before and after Mitigation Measures: Significant/Less than Significant.

Impact NO-3: Noise from stationary sources associated with operation of the proposed project or variant would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. CEQA Impacts both before and after Mitigation Measures: Significant and Unavoidable with Mitigation.

IBNA disputes that Impact NO-2 would have a less than significant CEQQA impact after Mitigation Measures, and agrees that Impact NO-3 would result in Significant and Unavoidable Impacts even with Mitigation.

After review, we request additional evaluation concerning noise because (1) the Existing Noise-Sensitive Land Uses are not properly described, (2) the Ambient Noise Level locations need to expand, (3) operational impacts are not adequately described, and (4) other mitigation measures should be considered.

The Existing Noise-Sensitive Land Uses (Draft EIR, pp. 3.6-5–3.6-6) described in the first bullet point as “the cluster of residential uses on the northern and southern sides of Innes Avenue between Griffith and Earl” is inadequate. As mentioned multiple times in prior public comment, sound travels farther than that. The water of India Basin conducts sounds throughout the natural amphitheater formed by the topography of India Basin. We suggest a more accurate description of land uses impacted by this project (first bullet point) is: All residential and business properties on both sides of Innes Avenue from Middle Point Road to Donahue and on both sides of Hudson from Hunters Point Boulevard to Arelious Walker. Add an additional bullet point to include all property to the top of the ridge, which would include the Northridge Cooperative Homes (above Innes Avenue) and the Morgan Heights townhome development (on Cleo Rand and on Jen-old). On p. 3.6-6, add to the list of buildings on the project site eligible for the California Register of Historic Places 911 Innes Avenue and the Albion Castle at 880 Innes Avenue, which is already listed on the National Register of Historic Places.

To properly reflect the requested expanded Existing Noise-Sensitive Land Uses, the Ambient Noise Level locations shown in Table 3.6-4 need to include sites at the top of the ridge, in addition to those at street level. As mentioned multiple times in prior public comment, it is our experience that sound is louder as it travels up.

The Operational Noise (p. 3.6-42 and Table 3.6-17) does not include noise impacts on the requested expanded Existing Noise-Sensitive Land Uses that will be generated by the large, active-use public spaces in the newly designed India Basin Shoreline Park, 900 Innes, and public spaces within the 700 Innes property.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-11]*)

---

“VIII. Noise: Section 3.6

We agree that many of the noise impacts would be significant and unavoidable.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-8]*)

### **RESPONSE NO-1**

These comments agree with an incorrectly summarized significant and unavoidable impact determination shown for Impact NO-3 on p. S-27 of the Draft EIR. Additionally, the commenters disagree with or request more analysis for the less-than-significant with mitigation impact determination in Impact NO-2. The comment identifies four reasons why additional evaluation is needed to address construction noise impacts: inadequate description of noise sensitive land uses in the project area; insufficient geographic extent of noise measurements; inadequate description of operational impacts; and need to consider additional mitigation measures to lessen the noise impacts.

The following discussion describes why the analysis in the Draft EIR was adequate, and accurately determined that the noise impacts of the project would either be less-than-significant with mitigation or significant and unavoidable; and, illustrates why the summary impact conclusion for NO-3 as shown in Table S-2 of the Draft EIR is incorrect.

Regarding the comment that the existing noise-sensitive land uses are not properly described, the nearest existing noise-sensitive land uses include residential and other land uses and are described on pp. 3.6-5–3.6-6 of the Draft EIR. The comment’s suggestion of adding a bullet to the list of Existing Noise-Sensitive Land Uses that would include “all residential and business properties on both sides of Innes Avenue from Middle Point Road to Donahue and on both sides of Hudson from Hunters Point Boulevard to Arelious Walker” includes business properties that are not considered noise-sensitive per the definition of noise-sensitive land uses and corresponding samples listed on p. 3.6-5 of the Draft EIR. Residences along Innes Avenue between Griffith Street and Earl Street are already included in the bullet list of existing noise-sensitive land uses appearing on pp. 3.6-5–3.6-6 of the Draft EIR, and residences between Griffith Street and Middle Point Road are already included as noise-sensitive land uses in the existing ambient noise level measurement location number 2 in Table 3.6-4 on p. 3.6-6 of the Draft EIR. The comment’s suggested second added bullet would add land uses such as the Morgan Heights townhome development, but this existing residential development is already included as an existing noise-sensitive land use in existing ambient noise level measurement location 6 (i.e., at the cul-de-sac of Cleo Rand Lane that abuts the

Morgan Heights residential land use) as shown on Table 3.6-4 of p. 3.6-6 and Figure 3.6-1 of the Draft EIR. Furthermore, consideration of the Morgan Heights townhome development, as an adjoining residential land use, is also included within the “East of Earl Street” studied roadway segment in Tables 3.6-5, 3.6-15, and 3.6-17. In similar fashion, the existing ambient noise levels of the Northridge Cooperative Homes are represented by location 2 as appearing in Table 3.6-4 on p. 3.6-6 of the Draft EIR; and, consideration of the Northridge Cooperative Homes, as an adjoining residential land use, is included within the “West of Hunters Point Boulevard” studied roadway segment in Tables 3.6-5, 3.6-15, and 3.6-17 of the Draft EIR. Accordingly, the EIR’s description of existing noise-sensitive land uses is correct, and supported by substantial evidence in the record.

In response to this comment, two additional bullets have been added to the bullet list preceding the first full paragraph on p. 3.6-6 in the Draft EIR, under the heading “Existing Noise-Sensitive Land Uses.”

- the residential building at 911 Innes Avenue, which is identified as a historic resource on the San Francisco Property Information Map;<sup>44</sup> and
- the commercial building at 881 Innes Avenue (Hunters Point Springs and Albion Brewery), which was determined to be eligible for listing in the National Register of Historic Places.<sup>45</sup>

The comment is correct that sound travels with distance but is incorrect in asserting that “sound is louder as it travels up.” As described on pp. 3.6-1–3.6-2, sound attenuates at a rate of 6 decibels (dB) per doubling of distance (i.e., 6 dB at 50 feet, 12 dB at 100 feet, and 18 dB at 200 feet). For this reason, the focus of the noise analyses is on nearest representative noise-sensitive receivers. If a noise-sensitive land use near the proposed project or variant is predicted to have a less-than-significant impact, it is reasonable to conclude that all other factors being unchanged, a noise-sensitive land use farther away would also be expected to experience a less-than-significant impact. Conversely, should a significant noise impact be predicted at a nearby noise-sensitive receiver, application of mitigation measures involving noise control (e.g., engine muffler) and/or sound path attenuation (e.g., barrier) that result in less-than-significant noise levels at that nearby receiver would be expected to be similarly effective for more distant noise-sensitive receivers in the same direction from the proposed project or variant.

Regarding the comment that the ambient noise level locations need to be expanded, ambient noise measurements were conducted at six locations on and in the vicinity of the project site. As stated on p. 3.6-6, these locations (shown in Figure 3.6-1) were selected because they represent the existing noise-sensitive land uses on and near the project site. As noted above, the focus of the analysis is on the nearest noise-sensitive receivers. As the potential for construction and operational noise impacts decreases with distance, the selected locations for measurement of existing ambient noise levels are appropriate for a conservative (i.e., worst-case) analysis of the proposed project potential noise impacts. Thus, obtaining ambient noise measurements “at the top of the ridge” would not assist in analyzing potential project-related noise impacts to the surrounding community for two reasons: 1) redundancy – according to the Background Noise Levels map appearing in the City of San Francisco Transportation Noise Element of the General Plan,<sup>46</sup> background levels in the vicinity of Harbor Road, Kiska

---

<sup>44</sup> Page & Turnbull, *India Basin Project Historic Resource Evaluation Parts 1 and 2*, 2017.

<sup>45</sup> Page & Turnbull, *India Basin Project Historic Resource Evaluation Parts 1 and 2*, 2017.

<sup>46</sup> City and County of San Francisco, San Francisco General Plan Environmental Protection Element, Map 1, [http://www.sf-planning.org/ftp/General\\_Plan/images/16.environmental/ENV\\_Map1\\_Background\\_Noise%20Levels.pdf](http://www.sf-planning.org/ftp/General_Plan/images/16.environmental/ENV_Map1_Background_Noise%20Levels.pdf), accessed March 5, 2018.

Road, and Northridge Road appear to be comparable to those along Innes Avenue where measurements were performed; and 2) project noise levels there would be lower, due to its larger distance from the project site, than at the six locations where existing ambient noise levels were measured. In sum, if existing background sound levels “at the top of the ridge” are comparable to those near Innes Avenue, but the proposed project noise levels at this area are expected to be lower than those predicted at closer locations due to increased sound attenuation associated with larger distances that the project noise must traverse, then the project’s potential to increase the existing sound environment along the ridge above significant impact criteria would be less than at the studied nearest noise-sensitive receivers that are closer to or adjoin Innes Avenue and the proposed project.

Regarding the adequacy of operational impact assessment, the proposed project’s potential operational noise impacts from stationary equipment are analyzed under Impact NO-3 in the Draft EIR. Stationary sources considered include HVAC equipment, loading dock activities, and trash collection. The analysis determined that a potential impact to nearby off-site and future on-site receptors could occur and recommends implementation of Mitigation Measure M-NO-3, which includes measures to locate noise-generating sources away from sensitive receptors and to ensure that performance-based noise attenuation features such as enclosures and parapets be incorporated for all stationary equipment. Implementation of Mitigation Measure M-NO-3 would meet noise level limits of Sections 2909(a), (b) and (d) of the City’s Noise Ordinance.

Furthermore, potential operational impacts from project-related traffic are analyzed under Impact NO-4. Based on modeling of existing and project plus existing traffic noise levels, the analysis concludes that the proposed project would result in a significant and unavoidable impact on the street segments indicated in Table 3.6-15. As the discussion on p. 3.6-32 explains, mitigation measures for reducing transportation noise typically entail the use of noise barriers. In the context of the project vicinity, barriers are not feasible because they could block access to private property and would conflict with urban design policies. Thus, the traffic-related noise impact would remain significant and unavoidable.

Based on the analyses in Impact NO-3 and Impact NO-4 in the Draft EIR, operational noise impacts of the proposed project and the variant have been evaluated in accordance with CEQA and City guidelines.

Regarding the comment that “other mitigation measures should be considered,” the comment does not specify what other mitigation measures should be considered or which potential noise or vibration impact(s) have not been adequately analyzed. Draft EIR Mitigation Measures M-NO-2a, “Implement Noise Control Measures during Project Construction,” M-NO-2b, “Implement Noise Control Measures for Pile Driving,” M-NO-3, “Design Future Noise-Generating Uses near Residential Uses to Minimize the Potential for Noise Conflicts,” and M-NO-6, “Implement Vibration Mitigation Measure for Pile Driving,” each employ standard approaches used from applicable Federal Transit Administration and California Department of Transportation noise and vibration guidelines that have been included for noise and vibration mitigation in other similar recent projects in San Francisco such as the Pier 70<sup>47</sup> and Mission Rock projects.<sup>48</sup>

---

<sup>47</sup> City and County of San Francisco Planning Department, *Pier 70 Mixed-Use District Project Draft Environmental Impact Report*, Case No. 2014-001272ENV, State Clearinghouse No. 2015052024.

<sup>48</sup> City and County of San Francisco Planning Department, *Seawall Lot 337 and Pier 48 Mixed-Use Project Draft Environmental Impact Report*, Case No. 2013.0208E, State Clearinghouse No. 2013122024.

However, were one to assume that the comment regarding consideration of “other mitigation measures” is associated with the comment’s remark regarding potential noise “generated by the large, active-use public spaces in the newly designed India Basin Shoreline Park, 900 Innes, and public spaces within the 700 Innes property,” such activities—such as those involving music or speech reinforcement—would generally be considered temporary in nature (as opposed to being continuous sources of noise such as air conditioning equipment operation) but still be required to comply with appropriate portions of the City of San Francisco Police Code, such as Section 2909(c), Section 1060.1, and Article 1, Section 49. Section 2909 of the Police Code limits noise generated from public property to 10 dBA above the local ambient at a distance of 25 feet or more and from commercial property to 8 dBA above the local ambient at any point outside the property plane. In addition, compliance with Section 2909(d) limits noise from outdoor activities in residential interiors to 45 dBA between 10:00 p.m. and 7:00 a.m. or 55 dBA between 7:00 a.m. and 10:00 p.m. with windows open. Any variance to these limits would be granted pursuant to Section 2910 of the Police Code and could only be approved through RPD. This permit process includes a requirement for neighborhood outreach. A public hearing at the Recreation and Park Commission is required for events that are louder than 80 dBA and are longer than four hours on a weekend day that ends later than 6 pm. Such activities involving noise levels higher than allowed under the police code could occur approximately 5 to 10 times per year at the Big Green on the 700 Innes property. RPD expects less than 15 annual citywide events on the Marineway lawn that would require a permit allowing amplified sound. Citywide events are likely to draw attendance from outside the immediate neighborhood. The type of event would be limited to events with an expected attendance that the park could accommodate. Examples of cityside events include free opera and jazz performances, free yoga events, and fairs for children, or ticketed events where the number of tickets would be limited based on the size of the park. Typical activities occurring at the Big Green on the 700 Innes property and the Marineway lawn at the India Basin Shoreline Park could include picnics, weddings, protests, and community-sponsored events. Noise emanating from such activities on the public spaces would either be expected to comply with regulated noise limits or be permitted to occur for a limited period of time; both of which would be the responsibility of the noise-producer and/or event permit applicant. Under these conditions, the potential operational noise impact with respect to usage of the public spaces within the proposed project or variant properties would be considered less than significant because these events would be temporary and intermittent. No changes to the EIR are required in response to this comment.

With respect to the comment regarding Impact NO-3, note that the “Significant and Unavoidable with Mitigation” entry under the CEQA Impacts after Mitigation Measure(s) column of Table S-2, p. S-27 of the Draft EIR for Impact NO-3 is incorrect. The correct impact conclusion for Impact NO-3 is “Less than Significant with Mitigation” as stated p. 3.6-28 of the Draft EIR. The analysis of on-site stationary operational noise impacts for the 900 Innes, India Basin Open Space, and 700 Innes properties in Draft EIR Section 3.6, “Noise,” on pp. 3.6-28 through 3.6-30 supports the finding that noise from stationary sources would be less than significant with implementation of Mitigation Measure M-NO-3, “Design Future Noise-Generating Uses near Residential Uses to Minimize the Potential for Noise Conflicts.” Mitigation Measure M-NO-3 will require two separate actions: exterior loading areas/docks, trash enclosures, and surface parking lots to be located on the sides of buildings facing away from existing or planned sensitive receptors (residences); and buildings to incorporate noise attenuation measures into all stationary equipment (e.g., HVAC equipment, emergency generators). In response to this comment, the text in Draft EIR Table S-2 under the CEQA Impacts after Mitigation Measure(s) column for Impact NO-3 (Draft EIR p. S-27) has been revised as follows:

~~Significant and Unavoidable with Mitigation~~ Less than Significant with Mitigation



Although one of the comments asserts that “many of the noise impacts would be significant and unavoidable,” only the proposed project or variant noise impact, Impact NO-4 (i.e., noise from surface transportation sources associated with operation of the proposed project or variant), and the cumulative noise impact, Impact C-NO-1 (proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site), were found to be significant and unavoidable in the Draft EIR.

## COMMENT NO-2: CUMULATIVE NOISE IMPACTS

- **O-IBNA-12**
- **I-Barshak-6**

“Impact C-NO-1: The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would substantially contribute to cumulative impacts related to noise. CEQA Impacts both before and after Mitigation Measures: Significant and Unavoidable.

IBNA agrees that Impact C-NO-1 would result in Significant and Unavoidable Impacts even with Mitigation.

We respectfully request additional noise mitigation suggestions for the homes and businesses within the requested expanded Existing Noise-Sensitive Land Uses zones. Multiple items shown in Table S-2 3.6 Noise Impact (No 3, No 4, and Impact C-No-1), are listed as having CEQA impacts “Significant” and have “no feasible mitigation measures” indicated.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Letter, October 29, 2017 [O-IBNA-12]*)

---

“Noise. The cumulative impact of noise from this project would be significant, this is included in the DEIR, as well as the considerable acoustical contribution of increased road traffic noise.” (*Jackie Barshak, Individual, Barshak, Email, October 26, 2017 [I-Barshak-6]*)

## RESPONSE NO-2

These comments agree with the cumulative noise impact finding of significant and unavoidable with mitigation, but request that additional noise mitigation measures be included in the EIR. The last paragraph of Draft EIR p. 3.6-42 under Impact C-NO-1 and the discussion of typical transportation noise mitigation measures presented on Draft EIR p. 3.6-32 explain the challenge of mitigating surface transportation noise. The measures typically involve insertion of sound-blocking barriers between the traffic and the noise-sensitive receivers. Such barriers usually need to be tall (i.e., so that sound path occlusion is attained), solid (i.e., feature no holes, gaps, or penetrations for access), and extend across long distances. These barriers would be considered infeasible and unreasonable, because they would interfere with access to private properties and likely result in visual impacts. As a result, additional noise mitigation is not considered feasible. However, usage of temporary noise barriers is considered feasible with respect to mitigating temporary construction noise. Mitigation Measure M-NO-2a on p. 3.6-25 of the Draft EIR includes a provision for implementation of sound-blocking barriers when the construction activities would occur within 100 feet of a noise-sensitive receptor. Such barriers would be dismantled or removed after the construction activity of concern has concluded. No further analysis or changes to the EIR are required in response to this comment.

## H. Air Quality

The comment and corresponding response in this section relate to the topic of Air Quality, evaluated in Draft EIR Section 3.7. The comments are further grouped according to the following issues:

- AQ-1: Air Quality Findings
- AQ-2: Exposure to Pollutant Concentrations

### COMMENT AQ-1: AIR QUALITY FINDINGS

- O-GA1-2
- O-GA2-9

“So from this report I just want to acknowledge what I do agree with in the Draft Environmental Impact Report. I do agree that significant and unavoidable with mitigation Impact AQ-1, “The proposed project or variant would generate emissions of criteria pollutants and precursors during construction, operations, and overlapping construction operated activities that could violate an air quality standard, contribute substantially to an existing or project air quality violation, or result in a cumulatively considerable net increase in criteria pollutants.” I agree.

Impact AQ point -- or dash 3, “The proposed project or variant would generate emissions that could expose sensitive receptors to substantial pollutant concentrations, significant and unavoidable with mitigation.” Correct.

Impact C-AQ-2, “The proposed project or variant, in combination with past, present, and reasonable-foreseeable future development in the project area, would contribute to cumulative health risk impacts to sensitive receptors.” I also agree with that.” (*Sheridan Noelani Enomoto, GA, DEIR Hearing Transcript, October 19, 2017 [O-GA1-2]*)

---

“IX. Air Quality: Section 3. 7

We agree with the DEIR’s assessment that this project will have significant and cumulative negative health impacts on air quality that cannot be mitigated and are unavoidable. Moreover, these impacts will exacerbate health impacts in an already heavy polluted and highly vulnerable low income community of color. In light of these facts, the proposed project cannot and must not be approved.

The CEQA analysis should include environmental, health, air quality and cumulative impact information from the California Environmental Protection Agency and the Bay Area Air Quality Management District (BAAQMD), both of whom have documented that Bayview Hunters Point is a community highly at risk from pollution.

In 2004 BAAQMD initiated the Community Air Risk Evaluation (CARE) program to identify areas with high concentrations of air pollution and populations most vulnerable to air pollution’s health impacts. The Bayview Hunters Point community was designated by BAAQMD as a CARE community. In Bayview Hunters Point, the intersection of ports, railways, municipal vehicle yards, concrete batch plants, freeways, and a large waste water treatment facility has contributed to high rates of air pollution and asthma hospitalizations. According to the Bay Area Air Quality Management District (BAAQMD), despite tremendous strides in air pollution reduction,

communities such as Bayview Hunters Point, experience higher pollution levels, and more adverse health effects, compared to their counterparts in other parts of the region ([http://www.baagmd.gov/-/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE Retrospective April2014.ashx](http://www.baagmd.gov/-/media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE%20Retrospective%20April2014.ashx)). Additionally, according to a report by the Bay Area Regional Health Inequities Initiative (a collaboration of senior officials, managers and staff from eight health departments in the Bay Area), where a person lives helps determine his or her health outcomes: Bayview/Hunters Point residents are expected to live 14 years less than those living in Russian Hill ([http://barhii.org/wp-content/uploads/2015/09/barhii\\_hiba.pdf](http://barhii.org/wp-content/uploads/2015/09/barhii_hiba.pdf)).

CalEnviroScreen 3.0 is a screening tool that ranks California communities based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors and prevalence of certain health conditions. CalEnviroScreen 3.0 ranks Bayview Hunters Point in the 90% percentile. This percentile means that Bayview Hunters Point has a higher pollution burden and pollution vulnerability than 90% of California (CalEnviroScreen 3.0 Data Map, <https://arcg.is/gim5X>).

More specifically, CalEnviroScreen ranks Bayview Hunters Point in the 99th percentile for diesel particulate, 98th percentile for groundwater threats, 98th percentile for asthma, 99th percentile for low birth weight, and 86th percentile for hazardous waste. The community's vulnerability to pollution is amplified by socioeconomic factors such as poverty, unemployment, and housing affordability. CalEnviroScreen ranks Bayview Hunters Point in the 87th percentile for poverty, 84th percentile in unemployment, and 91st percentile in housing affordability (residents of low-income households with high housing costs may suffer adverse health impacts)." (Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-9])

## RESPONSE AQ-1

These comments restate and agree with the Impact AQ-1, Impact AQ-3, and Impact C-AQ-2 findings in the Draft EIR Section 3.7, "Air Quality." The comments also state that the air quality impacts would exacerbate health impacts that are already present in a polluted low income community of color and that the proposed project must not be approved. A comment provides information about the fact that Bayview Hunters Point is a community highly at risk from pollution and provides additional information on the CARE program (referenced on p. 3.7-10 of the Draft EIR) and CalEnviroScreen summary data.

As analyzed under Impact AQ-1 on Draft EIR pp. 3.7-35–3.7-58, criteria pollutants emissions and precursors would be reduced during construction, operation, and overlapping construction and operation, and cumulatively with implementation of Mitigation Measures M-AQ-1a, "Minimize Off-Road Construction Equipment Emissions," M-AQ-1b, "Minimize On-Road Construction Equipment Emissions," M-AQ-1c, "Utilize Best Available Control Technology for In-Water Construction Equipment," M-AQ-1d, "Offset Emissions for Construction and Operational Ozone Precursor (NO<sub>x</sub> and ROG) Emissions," M-AQ-1e, "Implement Best Available Control Technology for Operational Diesel Generators," and M-AQ-1f, "Prepare and Implement Transportation Demand Management." However, as concluded under Draft EIR Impact AQ-1, even with implementing all identified feasible mitigation measures (Mitigation Measures M-AQ-1a through M-AQ-1f), ROG and NO<sub>x</sub> emissions could still contribute to new, or exacerbate existing, air quality violations in the San Francisco Bay Area Air Basin and, thus, cannot be lessened to a less-than-significant level.

Impacts AQ-3 and C-AQ-2 in the Draft EIR analyzed project- and cumulative-level health impacts from emissions of toxic air contaminants, including diesel particulate matter, and concluded that the proposed project or variant would result in a significant and unavoidable impact with mitigation due to construction and operation emissions of PM<sub>2.5</sub>. These health-related air quality analyses in the Draft EIR took into consideration the factors that were pointed out by the comments. Specifically, see Response AQ-2 for further discussion regarding toxic air contaminants and related potential to exacerbate health impacts, including with regard to areas of the City most adversely affected by sources of air pollutants.

CEQA provides that a project may be approved despite its significant and unavoidable impacts, if an agency adopts a statement of overriding considerations stating the specific reasons to support its action. (Public Resources Code, Section 21081(b); CEQA Guidelines, Section 15093.) No changes to the Draft EIR are necessary in response to this comment.

#### **COMMENT AQ-2: EXPOSURE TO POLLUTANT CONCENTRATIONS**

- **I-Barshak-7**

“The City has determined that the project would have impacts on air emissions that could cause significant health conditions.” (*Jackie Barshak, Individual, Barshak, Email, October 26, 2017 [I-Barshak-7]*)

#### **RESPONSE AQ-2**

The comment restates the Draft EIR determination in Impact AQ-3 that air emissions could cause significant health conditions. Impact AQ-3 in the Draft EIR (pp. 3.7-60–3.7-76) provides an analysis of construction and operational emissions that could expose sensitive receptors to substantial pollutant concentrations (i.e., toxic air contaminants [TACs] that in certain quantities may cause or contribute to an increase in mortality or in serious illness or that may pose a hazard to human health). As discussed in Draft EIR Impact AQ-3, implementing Mitigation Measures M-AQ-1a, “Minimize Off-Road Construction Equipment Emissions,” and M-AQ-1f, “Prepare and Implement Transportation Demand Management,” would reduce excess cancer risk to below both the EPA<sup>49</sup> and city Air Pollutant Exposure Zone (APEZ)<sup>50</sup> thresholds of 100 per one million persons under either the proposed project or variant. Thus, as concluded in the Draft EIR, the proposed project or variant would result in a less-than-significant impact with mitigation related to excess cancer risk.

Due to its small size, particulate matter, specifically PM<sub>2.5</sub>, can remain airborne for weeks and pose health concerns. Specifically, particulate matter can be deposited in the lungs when inhaled, causing respiratory illnesses and lung damage. As discussed in Draft EIR Impact AQ-3, implementing Mitigation Measures M-AQ-1a through M-AQ-1f would reduce concentrations of PM<sub>2.5</sub> from construction and operation of the proposed project or

---

<sup>49</sup> As described by BAAQMD, EPA considers a cancer risk of 100 per one million persons to be within the “acceptable” range of cancer risk. Cancer risk above this threshold is considered to represent excess cancer risk.

<sup>50</sup> The City and BAAQMD conducted a Citywide health risk assessment to identify areas of the City most adversely affected by sources of TACs. The results represent existing exposure to PM<sub>2.5</sub> and excess cancer risk across San Francisco and were used to identify areas of the City with poor air quality, which are within the APEZ. The APEZ meets either or both of the following criteria: 1) excess cancer risk of 100 per one million persons; 2) particulate matter concentrations greater than 2.5 micrograms per cubic meter (µg/m<sup>3</sup>). An APEZ for San Francisco is based on the health protective PM<sub>2.5</sub> standard of 11 µg/m<sup>3</sup>, as supported by EPA’s Particulate Matter Policy Assessment, although lowered to 10 µg/m<sup>3</sup> to account for uncertainty in accurately predicting air pollutant concentrations using emissions modeling programs.

variant, but PM<sub>2.5</sub> concentrations would still be greater than the City APEZ thresholds given the uncertainty regarding the effectiveness of Mitigation Measures M-AQ-1b, “Minimize On-Road Construction Equipment Emissions,” M-AQ-1c, “Utilize Best Available Control Technology for In-Water Construction Equipment,” M-AQ-1d, “Offset Emissions for Construction and Operational Ozone Precursor (NO<sub>x</sub> and ROG) Emissions,” and M-AQ-1f, “Prepare and Implement Transportation Demand Management.” Thus, as concluded in the Draft EIR, the proposed project or variant would result in a significant and unavoidable impact with mitigation due to construction and operation emissions of PM<sub>2.5</sub>. No changes to the EIR are required in response to this comment.

## I. Greenhouse Gas Emissions

The comment and corresponding response in this section relate to the topic of Greenhouse Gas Emissions, evaluated in Draft EIR Section 3.8. The comment is related to the following issue:

- GG-1: Greenhouse Gas Emissions Findings

### COMMENT GG-1: GREENHOUSE GAS EMISSIONS FINDINGS

- O-GA2-10

“X. Greenhouse Gas Emissions: Section 3.8

The DEIR incorrectly concludes in Section 3.8 that “The proposed project or variant would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.”

Greenhouse gas emissions from construction and the vehicular and truck traffic associated with constructed and using the proposed project residential and commercial components would add to the unacceptable level of air pollution impacting Bayview Hunters Point and its residents. Any increase of emissions into the air of this community which both the Bay Area Air Quality Management District’s CARE program and the California EPA’s CalEnviroScreen will further threaten the health of residents already at risk and highly vulnerable.”  
(Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-10])

### RESPONSE GG-1

The comment states that the Draft EIR “incorrectly concludes” that the project would not result in a significant impact for GHG emissions. However, the approach used in the Draft EIR is consistent with recommendations in the BAAQMD CEQA guidelines and methodologies and the City’s GHG Reduction Strategy for analyzing GHG emissions. It’s important to note that the project’s potential to emit toxic air contaminants, which are air pollutants that may cause or contribute to an increase in mortality or in serious illness or that may pose a hazard to human health, are analyzed in detail in Draft EIR Section 3.7, “Air Quality,” on pp. 3.7-1–3.7-88. As stated in the Draft EIR, the San Francisco GHG Reduction Strategy, which BAAQMD has reviewed and concluded that “Aggressive GHG reduction targets and comprehensive strategies like San Francisco’s help the Bay Area move toward reaching the State’s AB 32 goals.” As discussed in Draft EIR Section 3.8, “Greenhouse Gas Emissions,” under Impact C-GG-1 (pp. 3.8-20–3.8-21), and Appendix G, the proposed project and variant were both determined to be consistent with San Francisco’s GHG Reduction Strategy based on completion of the GHG checklists for private development and municipal projects. Specifically, the proposed project and variant would reduce GHG

emissions related to 1) transportation by complying with the Commuter Benefits Program, Emergency Ride Home Program, transportation management programs, transportation sustainability fee, Jobs-Housing Linkage Program, bicycle parking requirements, low-emission car-parking requirements, and carsharing requirements, as set forth in the project SUD, development agreement, or otherwise applicable per City regulations; 2) energy use by complying with energy efficiency requirements of the City's Green Building Code, Stormwater Management Ordinance, Water Conservation and Irrigation ordinances, and Residential Energy Conservation Ordinance; 3) waste disposal by complying with the city's Recycling and Composting Ordinance, Construction and Demolition Debris Recovery Ordinance, and Green Building Code requirements; and 4) wood burning by complying with the Wood Burning Fireplace Ordinance. Therefore, neither the proposed project nor variant would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, which are the City's applicable GHG thresholds of significance. As a result, the operational and construction impact of GHG emissions due to the proposed project or variant would be less than significant. No mitigation measures are necessary.

## **J. Wind**

The comment and corresponding response related to the topic of Wind, evaluated in Draft EIR Section 3.9, is discussed in Response AE-2 above.

## **K. Shadow**

The comment and corresponding response related to the topic of Shadow, evaluated in Draft EIR Section 3.10, is discussed in Response GC-2 below.

## **L. Recreation**

The comments and corresponding responses in this section relate to the topic of Recreation, evaluated in Draft EIR Section 3.11. The comments are grouped according to the following issues:

- RE-1: Project Design and Wildlife
- RE-2: Recreational Programming and Signage

### **COMMENT RE-1: PROJECT DESIGN AND WILDLIFE**

- **O-GGAS/SC-13**

“Land Use-The project proposal includes removal of dilapidated piers and installation of a new pier at a new location for kayak launch and rebuilding piers for commercial use cafe/beer garden. This requires approval from BCDC.

We are concerned that open space not lead to concrete sidewalk. As a green city, San Francisco, should be designing living shorelines for a resilient future. (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, GGAS/SC, Email, October 30, 2017 [O-GGAS/SC-13]*)

**RESPONSE RE-1**

To the extent the comment relates to requiring approval from the San Francisco Bay Conservation and Development Commission (BCDC) to construct the proposed project, this is mentioned on p. 2-75 in Draft EIR Chapter 2.0, “Project Description,” which states the proposed project and variant would seek approval for a major permit and an amendment to the *San Francisco Bay Plan* and the *San Francisco Waterfront Special Area Plan* from BCDC.

This comment also expresses concern regarding the installation of concrete sidewalks, and indicates that the project should incorporate designs for living shorelines. The project sponsors are committed to constructing sustainable and resilient park areas and are open to use of permeable paving materials in appropriate areas in a manner that is compliant with Americans with Disabilities Act (ADA) and other City standards. The India Basin Shoreline Park may include concrete sidewalks around the parking area; however, environmental impacts associated with concrete sidewalks were addressed in Draft EIR Section 3.12, Utilities, on p. 3.12-22. As stated on p. 2-15 in Draft EIR Chapter 2.0, “Project Description,” a portion of the shoreline along the India Basin Shoreline Park would be restored as a 0.64-acre improved tidal marsh wetland. As stated on p. 2-19 in Draft EIR Chapter 2.0, “Project Description,” the BUILD Development would restore a minimum 0.3-acre tidal marsh as improved tidal marsh wetlands. In addition, a minimum 0.48-acre freshwater seasonal wetland would be created and a drainage outfall that currently extends into the Bay would be removed. The seasonal freshwater wetland is being designed in anticipation of sea-level rise to provide future migration opportunities for the lower brackish saltwater wetlands. Collectively, these project components serve to create a living shoreline that is resilient to climate change and sea-level rise.

**COMMENT RE-2: RECREATIONAL PROGRAMMING AND SIGNAGE**

- **O-GGAS/SC-15**

“Aesthetics

Some recreational activities would be in conflict with birds and other wildlife; these activities which would harm wildlife should not be permitted ex: fireworks, light shows, release of balloons, candles on the water, drones, (except operated by permitted agencies for emergency situations), Monofilament recycling is required to prevent marine debris. Wildlife-proof trash and recycling containers are necessary, as this is a windy shoreline habitat.

To protect the birds, other wildlife and people, we support requiring that all dogs be on-leash in the India Basin Shoreline Park, except within Build Inc.’s established designated off-leash play areas within their development.

The EIR does not include information on the site importance for roosting shorebirds and rafts of waterbirds. The kayak launch should be closed from November through March each year so that all these resident and migratory birds can continue to use India Basin and the shoreline for feeding and resting. This should be managed and enforced.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-15]*)

## RESPONSE RE-2

The comment requests that certain activities be banned from the India Basin Shoreline Park permanently and other activities be banned during certain times of the year, including concern for wildlife from fireworks, light shows, release of balloons, candles on the water, and drones. San Francisco Park Code Section 3.09 prohibits operation of any apparatus of aviation in any park without permission of RPD. Current departmental policy does not provide drone permits for recreational use based on concern for impacts on other park users. SF Park Code Section 4.01 prohibits fireworks without permission of RPD. The department does not propose any lighting displays or fireworks within the project area. RPD has not determined if fishing will be permitted. If allowed, the RPD would limit fishing to appropriate locations and include monofilament waste disposal facilities, and would include multilingual signage to educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. RPD would follow safe fishing protocols to educate the public regarding potential toxins in Bay fish and potential effects on area wildlife.

The following text has been added to the Draft EIR Project Description to respond to this comment. The following text changes do not change any of the conclusions reached in the Draft EIR. The second full paragraph in the Draft EIR Section 2.3.3, “Architecture and Design,” on p. 2-38 has been revised as follows:

The Marineway lawn component of the proposal would extend north from the park entry and terminate at the water, at a beach for people to sit or kayakers to launch boats during higher tides, while a fixed pier would extend out into India Basin to meet a new floating platform. A viewing deck with seat steps extending to the edge of the enhanced Marsh Edge would be constructed over the buried remains of the *Bay City*, one of the historic ship hulls located within the Park. The deck would function as an interpretive exhibit conveying the history of the India Basin Scow Schooner Boatyard, including the remains of the *Bay City*. An outfitter building, located on land adjacent to the pier, would provide storage for kayaks, canoes, and life jackets; a kayak and canoe rental service; and office space to operate RPD programming. Members of the public would launch their own boats as well as the rental kayaks and canoes, and covered areas for shelter would provide space for birders, outdoor classes, and picnicking. Pursuant to San Francisco Park Code Sections 3.09 and 4.01, the following activities are prohibited from the India Basin Shoreline Park: fireworks, light shows, balloon releases, candles on the water, and drones.

The fifth full paragraph of the Draft EIR Section 2.3.4, “Landscaping,” on p. 2-40 has been revised as follows:

The Marsh Edge area would be restored by replacing the hard riprap edge along India Basin Shoreline Park with a soft, vegetated buffer that would provide habitat for birds and animals and improve the park’s ability to adapt to sea-level rise and storm surges. The India Basin Shoreline Park would also include interpretive signage or exhibits educating park visitors about the area’s history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.



The third full paragraph of the Draft EIR Section 2.3.5, “Shoreline and In-Water Uses,” on p. 2-41 has been revised as follows:

Finally, a gravel beach would be created at the end of the grass Marineway for people to sit or kayakers to launch boats during higher tides. Between November and March, no RPD programming involving on-water activities would be scheduled. In addition, RPD has located the India Basin Shoreline Park parking lot adjacent to the pier to prevent the transport of hand-powered boats through sensitive shoreline habitat.

## M. Utilities and Service Systems

The comment and corresponding response in this section relate to the topic of Utilities and Service Systems, evaluated in Draft EIR Section 3.12. The comments are further grouped according to the following issues:

- UT-1: Sewage Treatment Plant Impact and Stormwater Plan
- UT-2: Water Supply
- UT-3: Electrical Infrastructure

### COMMENT UT-1: SEWAGE TREATMENT PLANT IMPACT AND STORMWATER PLAN

- **O-GA2-11**
- **O-IBNA-14**

“XI. Utilities and Service Systems: Section 3.12

The DEIR failed to consider that the addition of thousands of new residents and workers whose homes and workplaces would add to the Southeast wastewater treatment facility’s load. The sewage treatment plant in Bayview Hunters Point already handles most of the City’s sewage as well as other that from other locations, and adding to this burden would have a significant unavoidable impact.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-11]*)

---

“Impact UT-1: The proposed project or variant would not exceed wastewater treatment requirements of the applicable RWQCB or result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the projected demand in addition to the providers existing commitments. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.

IBNA disputes that Impact UT-I would have a less than significant CEQA impact.

This plan is a little light on the storm water plan. It remains pretty vague and needs more detail. There is a plan to set up a first phase sewage treatment plant on-site that would create a gray water reservoir to keep the common areas watered all year and send the sludge waste on to the main sewage treatment plant at 3rd & Evans.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Email, October 29, 2017 [O-IBNA-14]*)

**RESPONSE UT-1**

These comments state that the proposed project and variant's impacts related to wastewater would be significant and unavoidable, and that more information related to the project's stormwater infrastructure should be included in the Draft EIR.

The Draft EIR did analyze the impact of additional development on wastewater services in the cumulative impact analysis. As described on pp. 3.12-19 and 3.12-20 of the Draft EIR, the incremental increase in wastewater flows from the proposed project or variant would not result in the construction of new wastewater treatment facilities or the expansion of existing facilities, because the proposed project and variant's wastewater demand of 0.1634 mgd and 0.1234 mgd of wastewater flows, respectively, could be accommodated by the Southeast Treatment Plant. Additionally, Subsection D, "Environmental Analysis of the Revised Proposed Project," of Chapter 2, "Project Description Revisions and Clarifications, and the Revised Proposed Project," describes the revised proposed project's wastewater demand. As stated in the Draft EIR on p. 3.12-29, "The cumulative projects would contribute additional wastewater to the existing Southeast Treatment Plant, which would reduce the available capacity for additional wastewater flows to be treated at the plant." Page 3.12-29 of the Draft EIR also states, "...[the] SFPUC is implementing the SSIP, which anticipates long-term development in the City pursuant to planned growth.<sup>51</sup> These improvements include, for example, the Biosolids Digester Facilities Project,<sup>52</sup> which would improve treatment and management of biosolids at the Southeast Treatment Plant; and the Sunnydale Auxiliary Sewer Project, which would reduce local wastewater and stormwater flooding during peak storm events, including wastewater flows from the Visitacion Valley/Schlage Lock Special Use District. Therefore, implementation of the cumulative projects would not require or result in the construction of new, or the expansion of existing, wastewater facilities. The cumulative operational wastewater impact would be less than significant." The Sewer System Improvement Program is intended to address the demands of San Francisco's rapidly growing population, which is expected to have a population of more than 1 million people by 2040.<sup>53</sup> This growth projection is consistent with the San Francisco General Plan Housing Element, which projects the City and County of San Francisco's population to be approximately 1,050,000 in 2040. Because cumulative growth is planned for in the *Bayview Hunters Point Area Plan* and the general plan, this growth would not represent significant unplanned growth. For these reasons, the increase in wastewater under the cumulative projects scenario would be within the SFPUC's growth projections and would be addressed as part of the Sewer System Improvement Program.

Stormwater facilities to be developed under the proposed project and variant are described by project site property under Impact UT-2, beginning on p. 3.12-22 of the Draft EIR. Impact UT-1 relates specifically to wastewater. Wastewater from India Basin Shoreline Park and 900 Innes properties would be discharged directly to the City's sewer system, and as stated on p. 3.12-18 of the Draft EIR, the increase in wastewater generated by the India Basin Shoreline Park and 900 Innes properties would not be enough to exceed the capacity of the Southeast Treatment Plant for worst-case wastewater discharges (i.e., during wet weather). As discussed in the Draft EIR on p. 3.12-18, no wastewater would be generated at the India Basin Open Space property other than from restroom

---

<sup>51</sup> San Francisco Public Utilities Commission (SFPUC), *Sewer System Improvement Program 2014 Annual Report: Building Momentum*.

<sup>52</sup> The EIR for the Biosolids Digester Facilities Project was certified in March 2018, and construction is anticipated to occur in late 2018.

<sup>53</sup> *Ibid.*

use and food vendors. Two potential wastewater scenarios are discussed on p. 3.12-19 for the 700 Innes property. The two scenarios include discharge of all sewer flows to the City’s sewer system or construction of a wastewater treatment facility on-site to treat a portion of the wastewater for reuse on-site as recycled water. As stated on p. 3.2-20 of the Draft EIR, the wastewater flows generated from the 700 Innes property could be accommodated by the Southeast Treatment Plant and therefore would not contribute to a violation of current wastewater treatment and discharge requirements. The 700 Innes property’s wastewater flows during wet weather are not anticipated to exceed the wastewater treatment requirements of San Francisco Bay RWQCB.

Overall, the wastewater flows from all four properties combined would not exceed the capacity of the Southeast Treatment Plant or exceed the wastewater treatment requirements of the San Francisco Bay RWQCB. Therefore, the operational impact of the proposed project or variant related to exceedance of wastewater treatment requirements would be less than significant for all four project site properties.

In response to this comment, text changes have been made to the Draft EIR Section 3.12, “Utilities and Service Systems,” on p. 3.12-18 as follows:

***India Basin Shoreline Park and 900 Innes Properties***

Wastewater from the India Basin Shoreline Park and 900 Innes properties would be generated by restroom use (flows and flushes) and food vendor concession operations and would be discharged directly to the City’s sewer system.

**COMMENT UT-2: WATER SUPPLY**

• **IBNA-15**

“Impact UT3: The proposed project or variant would not require new or expanded water supply resources or entitlements. CEQA Impacts both before and after Mitigation Measures: None / Less Than Significant.

IBNA disputes that Impact UT-3 would have none or a less than significant CEQA impact. Section 3.12-28 finds the supply of water to adequate for the project, but does not evaluate water pressure. The supply may be adequate (this is not clear from the DEIR) but is the distribution system capable of delivering this increased flow without a significant reduction in our already very low water pressure? It seems that the developer recognizes that the water utilities will not be enough to accommodate the increased population both in the Shipyard and in the 700 Innes project. Water pressure must be examined to see if residents’ needs can be met.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Email, October 29, 2017 [O-IBNA-15]*)

**RESPONSE UT-2**

The comment requests more information related to the proposed project and variant’s impacts to water pressure in the project area and disputes the less-than-significant conclusion for Impact UT-3. As stated in the Draft EIR Section 3.12, “Utilities and Service Systems,” on p. 3.12-3, the “water from the RWS is distributed in San Francisco through a local low-pressure distribution system that is owned by SFPUC and maintained by San Francisco Public Works (SFPW).” Potable water supply and distribution are discussed in the Draft EIR on pp. 3.12-21. As stated on p. 3.12-26, “The India Basin WSA [water supply assessment], approved by SFPUC on

December 13, 2016, concluded that SFPUC has adequate short-term and long-term water supplies to operate the project through 2040.”<sup>54</sup> Individual building/structure water pressure is not a CEQA issue and, therefore, was not evaluated in the Draft EIR. However, for further information/clarification, water models will be prepared by the project sponsors for the proposed project or variant as a part of the Low Pressure Water Master Utility Plan (LPWMP), which will document the performance of the system with project improvements to ensure that the on-site and SFPUC water systems will maintain adequate pressure for proposed land uses as well as fire-suppression purposes. This plan will be reviewed and approved by the City.<sup>55</sup> Additionally, Subsection D, “Environmental Analysis of the Revised Proposed Project,” of Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” describes the revised proposed project’s water demand. No changes to the EIR are required in response to this comment.

### **COMMENT UT-3: ELECTRICAL INFRASTRUCTURE**

- **O-IBNA-2**
- **IBNA-13**

“2) the lack of a plan to underground the aging power lines along Innes Avenue feeding the proposed development,” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Email, October 29, 2017 [O-IBNA-2]*)

---

#### “3.12 Utilities and Service Systems

Note: Section 3.12 only discusses water, both potable and recycled, and wastewater, both sewage and stormwater. It does not discuss electricity or gas supply which is a glaring omission, which must be addressed. No information is provided on the impact to existing electrical, internet, and cable infrastructure when access to these utilities are provided to the 700 Innes project. How will those utilities get to the project except to use the existing lines and poles. India Basin has some of the oldest power lines along Innes Avenue (dating back to 1941), which feed electricity to both this proposed development as well as the new Shipyard development, at which point all utilities are undergrounded. These aging power lines have failed multiple times in recent years, resulting in at least three blown transformers causing fires that threatened existing homes. IBNA believes that the only safe mitigation measure would be to underground all utilities running along Innes Avenue from Middlepoint/Jennings at Evans to Innes Avenue at Donahue. This DEIR does not address this issue, but plans to underground utilities must be included before finalizing. This is a health and safety issue of utmost importance.” (*Sue Ellen Smith, Chair, et. al., India Basin Neighborhood Association, Email, October 29, 2017 [O-IBNA-13]*)

---

<sup>54</sup> Some changes to the proposed project, labeled as the “revised proposed project,” also are described and analyzed in Chapter 2. However, as concluded in Chapter 2, such changes would not result in changes to the Draft EIR Utilities and Service Systems impact conclusions or mitigation measures. In addition, SFPUC confirmed that a new WSA is not required for the revised proposed project and determined that the current adopted WSA is sufficient in its assessment for the revised proposed project (SFPUC letter to Christopher Thomas, San Francisco Planning Department, February 16, 2018).

<sup>55</sup> This is per the India Basin Mixed-Use Project Water Pressure memorandum from BKF to BUILD, November 28, 2017.

**RESPONSE UT-3**

These comments express concern about lack of a plan to locate power lines underground along Innes Avenue, and that the Draft EIR Section 3.12, “Utilities and Service Systems,” on pp. 3.12-1–3.12-32 does not discuss electricity, gas, internet and cable infrastructure for some of the sites. The analysis of the proposed project and variant, and the identification of significant impacts with respect to utilities are based on “thresholds of significance” enumerated on p. 3.12-16 of the Draft EIR. These thresholds, based on Appendix G of the CEQA Guidelines, and adopted by the San Francisco Planning Department, relate to water and wastewater utilities required for or impacted by the project and potential impacts to the physical environment as a result. Although none of the thresholds of significance directly discuss gas, electric, internet, or cable utilities, utilities are described in the Draft EIR Section 3.16, “Hazards and Hazardous Materials,” on pp. 3.16-4 and 3.16-6. The analysis of Impact HZ-6 on p. 3.16-63 that the relevant portions of infrastructure would be built in conformance with the California and San Francisco fire codes, including necessary utility and access requirements for fire protection and emergency services. The Draft EIR discussion in Impact HZ-6 also states that existing gas and electric and other utility infrastructure would be upgraded, resized, and located underground as part of the project, and therefore would not overtax existing overhead power lines along Innes Avenue. Text changes proposed below are included to clarify that the project sponsor would require PG&E approval to upgrade, resize, and locate underground the existing gas and electric facilities and other utility infrastructure. Existing capacity and adequacy to provide utility service to the proposed project or variant is discussed below.

Draft EIR Section 3.16, “Hazards and Hazardous Materials,” includes a significance threshold regarding whether the project would expose people or structures to a significant risk of loss, injury, or death involving fires. As such, impacts relating to potential safety issues from overloaded utilities are addressed in Section 3.16. Concerns regarding potential safety issues at the project site with respect to overtaxing of overhead power lines are acknowledged on pp. 3.16-4, 3.16-6, and the impacts of the proposed project and variant on overhead power lines are analyzed on pp. 3.16-62–3.16-63 of the Draft EIR.

To further support this analysis, and the conclusion that the overall impact of the proposed project or variant related to the potential to expose people or structures to a significant risk of loss, injury, or death involving fires would be less than significant, an assessment of the proposed project or variant in relation to local electric distribution system reliability and capability concerns was commissioned from Power Systems Design (PSD).<sup>56</sup> This assessment concluded that “the India Basin Project should not negatively impact the local existing PG&E electric distribution system reliability and public health and safety. Existing facilities appear to be adequate to serve the proposed India Basin Project; however, load growth in the greater area may require system improvements. These improvements would replace aged and deteriorated facilities and improve reliability. It is PG&E’s standard protocol to assure public safety and system reliability when adding load to an existing system includes the analysis of engineering and design criteria. Furthermore, the utility periodically inspects all facilities to assure public safety. If the local area is experiencing unacceptable levels of service interruption and safety concerns (i.e., transformer failures), then addressing PG&E directly is recommended. The proposed project and variant would not affect or use any existing local distribution transformers. Undergrounding of facilities along Innes Avenue adjacent to the project site would be at the discretion of the developer, unless mandated in the

---

<sup>56</sup> This is per the India Basin Mixed-Use Project Electric Distribution System Reliability memorandum from PSD to BUILD, December 15, 2017.

conditions of approval. Please note that this assessment assumes the utilities will perform and meet obligations per standards and C.P.U.C. requirements for reliable and safe system performance and operations.”

In response to this comment, the following text change has been made to the Draft EIR in Section 3.16, “Hazards and Hazardous Materials,” on p. 3.16-63:

The proposed project or variant would be built in conformance with the California and San Francisco fire codes, including necessary utility and access requirements for fire protection and emergency services. The project sponsors would seek PG&E approval to. Existing gas and electric and other utility infrastructure would be upgraded, resized, and located Existing gas and electric and other utility infrastructure underground as part of the project. An assessment of the proposed project and variant with respect to local electrical distribution system reliability and capability was undertaken (Power Systems Design 2017), which concluded that the project should not negatively impact the local existing PG&E electric distribution system reliability and public health and safety, assuming the utilities (i.e., PG&E and SFPUC) perform their work and meet their obligations per their standards and CPUC requirements for reliable and safe system performance and operations. Therefore, the project is not anticipated to, and therefore would not overtax existing overhead power lines along Innes Avenue in such a way that people or structures would be exposed to a significant risk of loss, injury, or death involving fires.

In response to this comment, the following new reference has also been added to EIR p. 3.16-67:

Power Systems Design. 2017 (November 27). India Basin Project, Local Electrical Distribution System Reliability and Capability Concerns. Letter to Ms. Victoria Lehman, BUILD.

## **N. Public Services**

The comment and corresponding response in this section relate to the topic of Public Services, evaluated in Draft EIR Section 3.13. The comment is related to the following issue:

- PS-1: Demand for Public Services

### **COMMENT PS-1: DEMAND FOR PUBLIC SERVICES**

- **O-GA2-12**

“XII. Public Services: Section 3.13

The DEIR’s conclusion that the proposed project or variants would not increase demand for fire, police, library, school services is incorrect. Clearly, the addition of thousands of new residents and office/commercial workers in hundreds of new dwelling and commercial units would have a significant impact on limited city services.”

*(Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-12])*

### **RESPONSE PS-1**

This comment disagrees with the conclusions reached in Draft EIR Section 3.13, “Public Services.” The Draft EIR states the proposed project and variant would increase the use of City services; however, as stated on p. 3.13-

7 of the Draft EIR, the CEQA threshold of significance for determining the significance of impacts is based on whether there would be substantial adverse physical impacts associated with the construction of new fire, police, school, or park facilities. The Draft EIR concludes that increased demand for public services would not result in the need to construct new or expanded facilities to serve the proposed project or variant. Specifically, with regard to fire facilities, the San Francisco Fire Department (SFFD) confirmed that current SFFD resources would be sufficient to meeting the SFFD’s response time goals,<sup>57</sup> project site is located in an area that is accessible by existing SFFD personnel, the components of the proposed project or variant would be constructed according to the California and San Francisco fire codes, and the proposed project or variant would not require providing new or altered fire protection facilities. According to the San Francisco Police Department, police protection resources are regularly redeployed within each district and, as necessary, between districts based on the need to maintain acceptable service ratios.<sup>58</sup> In addition, the project sponsor would be required to pay fees to the SFUSD that are considered full and complete mitigation of the impacts of development on local school systems. With regard to library facilities, the proposed project and variant would contribute to library funding through property taxes. In addition, according to the branch manager of the Bayview Linda Brooks-Burton Branch Library, the additional residents generated by the proposed project or variant would likely be accommodated by the Bayview Linda Brooks-Burton Branch Library, which was renovated and expanded in 2013.<sup>59-60</sup> As a result, the Draft EIR concludes that the proposed project and variant’s impact on public services would be less than significant, and no mitigation measures are necessary.

The following text changes have been made to Draft EIR Section 3.13, “Public Services,” on p. 3.13-11:

The additional residents generated by the proposed project or variant would likely be accommodated by the Bayview Linda Brooks-Burton Branch Library and other branch libraries in the vicinity (Hayes, pers. comm., 2016). Funding for library services and facilities comes from voter-approved bond measures and the General Fund, which receives revenue from a range of sources, including property taxes. The proposed project or variant would contribute to library funding through property taxes ~~and development fees~~ that would be proportionate to the increased demand in library services.

These revisions do not change any of the analysis or conclusions of the EIR.

## O. Biological Resources

The comments and corresponding responses in this section relate to the topic of Biological Services, evaluated in Draft EIR Section 3.14. The comments are further grouped according to the following issues:

- BI-1: Shorebird and Migratory Bird Impacts

<sup>57</sup> Rivera, Anthony, Assistant Deputy Chief, San Francisco Fire Department, letter to Christine Wolfe of AECOM regarding fire protection services in the City of San Francisco and in the project area, March 6, 2017.

<sup>58</sup> Sainez, Hector, Assistant Chief, San Francisco Police Department, telephone call with Christine Wolfe of AECOM regarding police protection services in the City of San Francisco and in the project area, February 15, 2017.

<sup>59</sup> San Francisco Public Library, 2015, Reinvesting and Renewing for the 21<sup>st</sup> Century, <https://sfpl.org/pdf/about/commission/ReinvestingRenewing.pdf>, accessed June 25, 2018.

<sup>60</sup> Hayes, Beverly, Branch Manager, Bayview Linda Brooks-Burton Branch Library, San Francisco, e-mail with Christine Wolfe of AECOM regarding ability of the Bayview Linda Brooks-Burton Branch Library and other branch libraries in the vicinity to accommodate the addition of residents associated with the revised proposed project, August 16, 2016.

- BI-2: Bird Safe Building Guidelines
- BI-3: Plantings at the Project Site
- BI-4: Wetlands Impacts
- BI-5: Cumulative Biological Impacts

**COMMENT BI-1: SHOREBIRD AND MIGRATORY BIRD IMPACTS**

- **A-ABAG-7**
- **O-GGAS/SC-1**
- **O-GGAS/SC-2**
- **O-GGAS/SC-3**
- **O-GGAS/SC-4**
- **O-GGAS/SC-5**
- **O-GGAS/SC-7**
- **O-GGAS/SC-8**
- **O-GGAS/SC-14**
- **O-GGAS/SC-16**

“Biological Resources

The DEIR states that enhanced kayak facilities could result in less than significant impacts associated with “increased human presence in tidal marsh and open water habitat at India Basin [that] could affect shorebird behavior” (p3.14-44). This is consistent with the WaterTrail’s EIR, which notes that boater education regarding wildlife and ethical paddling behavior is important to minimize these potential impacts.” (*Ben Botkin, San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Email, October 27, 2017 [A-ABAG-7]*)

---

“To begin this letter we are forced to address the fact that the DEIR is appallingly lacking in addressing the wildlife issues presented in both of our organizations’ scoping letters. We believe the DEIR needs to be rewritten and re-circulated in order to address the wildlife issues described below.

CEQA requires that the project look at the entire location. This includes the surrounding areas of Heron’s Head Park, Candlestick, and the Bayview.

The presence of migratory waterbirds (duck, grebes and shorebirds) is tossed aside as unimportant in the DEIR at 3:14-53 (balding by us)



---

“Migratory Birds:

Because the project site and surrounding areas are highly developed and disturbed, the San Francisco shoreline in the project area does not provide a movement corridor for terrestrial wildlife. Open water and tidal habitats along the shoreline provide stopovers for migratory birds along the Pacific Flyway, a major migration route in North America. Despite this important habitat for migratory birds, the current condition of the project area is primarily developed and disturbed, offering only low-quality habitat for birds to forage and nest. As discussed previously in Impact BI-1a, construction of the project indeed may affect the ability of migratory birds to forage, nest, or stop over in the project vicinity, because habitat would be temporarily removed and both noise levels and human presence would increase. In fact, the construction impact of the proposed project or variant on migratory birds and their corridors could be significant.”

This might suggest a concern for migratory waterbirds but in fact it is essentially discussing land bird impacts. This completely ignores the fact that since ducks and geese have open water as their habitat the site’s “developed and disturbed” nature is not an applicable statement. Diving ducks feed on fish, shellfish and fish roe. There is no reason to believe that India Basin does not have such species and the DEIR does recognize the presence of fish. The EIR consistently ignores the fact that both writers of this letter are excellent birders and both relate having seen large rafts of ducks (including species such as greater and lesser scaup, surf scoters, ruddy ducks) as well as significant numbers of grebes and geese in India Basin waters, as have other members of our organization and as has been documented on “ebird.” We have seen harbor seals in the Basin. Our members have seen extensive numbers of shorebirds. In fact, India Basin evidently provides excellent roosting and foraging habitat for these species as indicated by the numbers of species and individuals observed by our members. The DEIR provides no evidence to refute these observations of high waterbird use of the Basin other than the unsubstantiated comment that the project site habitat is disturbed and developed.

To reiterate, open water is by definition not developed. As regards shorebirds, their habitat consists primarily of mudflats and tidal marsh and even riprap. The project site provides a great deal of mudflat, some tidal marsh and riprap; ideal habitats. The fact that most, but far from all, the shoreline of the proposed project consists of “developed and disturbed areas” does not mean it lacks significant habitat value. For example, shorebirds can be found along the entire San Francisco shoreline wherever it is not actually leveed like the Embarcadero.

San Francisco Bay is well known as a critical overwintering site for waterfowl. San Francisco Bay is recognized as a site of Hemispheric Significance for shorebirds, actually. In fact, regarding both waterfowl, grebes and shorebirds, India Basin would be the only basin/inlet on the SF shoreline that would have no waterbird species. For example, Mission Creek, Warm I Water Cove, Pier 94, Yosemite Slough all have a significant amount of “disturbance and development” and yet still host large numbers of waterbirds. Even more striking is the number of ducks (including occasionally the Harlequin Duck - a species of special concern) and shorebirds that are found along the shoreline and in the basin between the recycling Pier and Heron’s Head Park.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-1]*)

“The fact that the bird survey performed By WRA took place in April confirms the lack of interest in this issue by the DEIR. It is well known that the primary waterfowl migratory season is November to March. Shorebird numbers are also at their highest during the winter months since both ducks and shorebirds are migrating away from the Arctic winter to warmer climates and then migrating back north in the spring in order to take advantage of the springtime food resources of Canada and Alaska. The fact that Appendix K does not identify a single duck or shorebird as present in the project environs (other than Ridgway’s Rail at Heron’s Head Park) once again confirms the seeming intent of the DEIR to ignore the presence of these migratory species for which CEQA requires addressing and mitigating for all impacts. (“The proposed project or variant would interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors. or impede the use of native wildlife nursery sites.”)

Attached please find the bird species observed at India Basin Shoreline Park (109 species), India Basin Open Space (103 species) and Heron’s Head Park (176 species). More people that go bird watching in this area today (and submit observations) are visiting Heron’s Head Park since it has public facilities (parking, bike racks, water fountain, restrooms etc.). Many of the bird species travel from one side of India Basin to the other based on the tides, in search of food, or resting areas. There are 25 species of waterfowl, 10 species of loons and grebes, 3 cormorant species, 1 pelican species, 4-6 heron species, 30 shorebirds, 16 gulls, terns and skimmers, plus hawks, falcons, swallows and songbirds. The graphs by month show bird species including those present year-round. With a few exceptions, those species present during the breeding season April-July generally indicates that they breed in this area. This new site has the opportunity to provide more biodiversity than Heron’s Head Park since it includes the water, shoreline, marsh and upland.

The failure of the DEIR to identify the presence of any of these migratory waterbird species indicates the complete failure to recognize potential impacts to these species as a result of the project and a concomitant lack of mitigations for any of those impacts. These impacts include disturbance that results in unusual movement, including flushing that depletes the energy reserves of these species, and may even cause complete abandonment of existing habitats.

These species travel long distances in their migration and expend a considerable proportion of their body weight and energy reserves to do so. When they reach an over-wintering location their goal is to gain sufficient calories to enable them to undertake successfully their migration north to their breeding grounds. Failure to achieve sufficient energy resources can lead to death on their migration or failure to reproduce successfully. Studies have shown that a typical diving duck may spend 28% of its time feeding, 57% resting, 11 % in locomotion, 4% preening and only 1% in alert behavior. It is easy to see that any added “alert behavior” such as that generated by human disturbance, may have a significant impact on these species.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-2]*)

---

“We submitted numerous studies on the impacts of public access both on land and on water on these water bird species in our scoping submittals. Some of these studies reveal that kayaking can have significant disturbance

impacts on waterbird species. The failure to identify the presence of these migratory species and thus the failure to identify impacts and mitigations results in a document that is fatally flawed. It requires that the DEIR be rewritten and recirculated in order to address these biological resource impacts, especially the failure to address the CEQA issue; Impact BI-4: “The proposed project or variant would interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.”

We have made our concerns known at the many public meetings held by the Department of Recreation and Parks; we have stated that a kayak launching site would have significant impacts to these species. We did suggest that mitigation for those impacts could consist of a seasonal closure of use of the kayak launching sites from November to March (inclusive). Such seasonal closures are already implemented in several locations in the Bay Area. The Department in later meetings agreed to implement such a seasonal closure- but those assurances have evidently been ignored. In fact, the DEIR addresses no such impacts in its Recreation section despite the scientific evidence of the problem as found in our submittals.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-3]*)

“Other impacts on waterbirds from this project should also be analyzed. Bright night lighting can impact reproductive efforts. Some shorebirds, such as the Black Oystercatcher, breed at Heron’s Head in San Francisco. Intense sudden sounds can also disturb shorebird and duck species. The DEIR should address this issue and we believe appropriate mitigations would include instructions that lighting should be minimized and implemented according to the Better Streets Plan and Standards for Bird Safe Buildings. The following URL provides useful suggestions: <http://darksky.org/light-pollution/wildlife>.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-4]*)

“We submit with these comments a study of Snow Plovers performed by K. Lafferty at Coal Oil Point in Santa Barbara’. This study indicates the impacts that public access can have on shorebird shoreline habitat. It also includes a solution that we believe can be beneficial to this project. The study found that roping off a relatively small portion of the shorebird habitat (a beach in this case) and instituting a decent educational program that informed the public of the impacts to the shorebirds resulted in significant reduction in impacts and a growth in the shorebird colony –while having no impact on human visitor numbers or enjoyment.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-5]*)

“Taking into account the above, we once again request that the DEIR be rewritten and recirculated in order to address these habitat/disturbance issues.

We believe that if the project and its DEIR genuinely recognize and appropriately mitigate for these impacts, this project could be a tremendous asset to the City providing a variety of recreational experiences and in particular nature experiences that are all too rare in our city. The proposed park and shoreline development at India Basin in San Francisco is an opportunity for the project to provide habitat for a variety of birds-waterbirds, shorebirds, passerines and hawks. There is potential that this site adjacent to San Francisco Bay and with a shoreline and upland area can provide enhanced habitat from the shoreline to the upland with a variety of native plants for birds and other wildlife. The native plants evolved with the native birds, butterflies and other wildlife by providing habitat (food and shelter) and these provide ecosystem benefits. These plants are most likely to survive in our Mediterranean climate, require less water, clean the water that flows to the Bay, and sequesters carbon, creating oxygen for people. Many native plants can also help address the anticipated sea level rise issues of erosion and storm surge erosion.

With proper mitigations such a seasonal kayak closures and appropriately protected habitat areas, a truly exceptional development may result. First, the DEIR must recognize the presence of the natural resources discussed above and provide the mitigations that would allow both humans and wildlife to thrive.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-7]*)

---

“Survey conducted only in April missed accounting for the pre presence of bird species at other times of year including overwintering water bird species and early and late migrating species. The nesting season begins as early as January for Great Horned Owls and Anna’s Hummingbirds so tree removal or cutting should include nesting surveys according to the best practices – see Healthy Trees, Healthy Birds. The newly released California best management practices for tree care and wildlife professionals is a recommended resource to protect wildlife during the project implementation and in future management of the park and shoreline development. See <http://treecareforbirds.com>.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-8]*)

---

No mention is made of the need to protect local and migratory shorebirds and water birds and providing an unambiguous seasonal (winter) shutdown of a kayak launch to be managed by SF Recreation and Parks Department or Port of SF.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-14]*)

---

“Wetland

5.3 2 Birds - See attached ebird reports. Survey conducted in April missed bird species present at other times of year including large volumes of overwintering water bird species and early and late migrating species. The nesting season begins as early as January for Great Horned Owls and Anna’s Hummingbirds so tree removal or cutting should include nesting surveys according to the best practices

Thank you for considering these comments on the future of this critical habitat for birds and other wildlife, which is also important for residents and visitors to San Francisco.” (Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-16])

## RESPONSE BI-1

These comments generally express concern that the Draft EIR does not address potential project-related impacts on migratory shorebirds, including but not limited to disturbance that results in flushing that depletes the energy reserves of the species, abandonment of existing habitats, and impacts from new lighting and sound sources. A comment submits a database query of the online eBird website<sup>61</sup> for India Basin Open Space property and states the background biological survey conducted for the proposed project and variant failed to identify bird species present at other times of the year. The comments also request that the project use the Golden Gate Audubon Society’s Healthy Trees, Healthy Birds plan as guidance to protect wildlife during project implementation.

Draft EIR Appendix K provided Biological Resources Assessments for all four project site properties. These reports identified the observation of common shorebirds, including Canada goose (*Branta canadensis*), American avocet (*Recurvirostra americana*), black-necked stilt (*Himantopus mexicanus*), and western gull in open water habitat and in disturbed infill during habitat assessment surveys. The biological surveys supporting these Biological Resources Assessments were conducted by qualified biologists during the spring to identify suitable habitat for special-status and common species, and to identify special-status species that may be present in the project area. Because many bird species nest between March 1 and August 31,<sup>62</sup> springtime (April) is the industry standard time of year to conduct these surveys: The month of April is situated within the nesting bird season for most special-status and common species, as well as during the growing season, when vegetation communities and habitat are most easily identifiable.

In accordance with CEQA Guidelines Appendix G and the San Francisco Environmental Review Guidelines,<sup>63</sup> the Draft EIR assessed the construction and operational impacts of the proposed project and variant on special-status bird species, including migratory waterbirds (see Draft EIR pp. 3.14-37–3.14-40) and nesting birds (see Draft EIR pp. 3.14-40–3.14-44) at the project site. Further, the purpose of these biological surveys was to comply with CEQA and the San Francisco Environmental Review Guidelines, to document special-status and common species habitat, and to detect special-status species that could occur at any time of the year based on habitat conditions. The CEQA Guidelines and the San Francisco Environmental Review Guidelines do not require that surveys identify all species that may be present in the project area.

Based on the habitat observed during these surveys, the Biological Resources Assessment acknowledges the potential presence of both special-status and common species (including overwintering water bird species and early- and late-migrating species). Furthermore, the eBird data provided by the commenter support the findings

---

<sup>61</sup> eBird is an online database of bird distribution and abundance, accessible at <http://www.ebird.org>.

<sup>62</sup> Golden Gate Audubon Society: Tree Care and Bird Safety, <https://goldengateaudubon.org/conservation/make-the-city-safe-for-wildlife/tree-care-and-bird-safety/>, accessed June 20, 2018.

<sup>63</sup> San Francisco Planning Department: Environmental Review Guidelines, <http://sfmea.sfplanning.org/EP%20Environmental%20Review%20Guidelines%202010-5-12.pdf>, accessed June 20, 2018.

made in the Biological Resources Assessment, which acknowledges the potential presence of common species. While the EIR-supporting biological surveys may not have identified all species present at the project site, the biological surveys were conducted during a suitable time of the year for identifying nesting birds and most special-status and common species. The biological surveys were also conducted during the growing season, which is when vegetation communities and habitat are most easily identifiable. In addition, surveys during other times of the year may identify other migrating bird species, but could preclude observations of some nesting bird species, special-status species, or other migratory birds, and would not change any of the conclusions in the Draft EIR.

The project would use the Golden Gate Audubon Society's Healthy Trees, Healthy Birds plan as guidance to protect waterfowl and other birds during project implementation.

Draft EIR Section 3.14, "Biological Resources," Impact BI-1 assessed the construction and operational impacts of the proposed project and variant on special-status bird species, including migratory waterbirds (see Draft EIR pp. 3.14-37–3.14-40) and nesting birds (see Draft EIR pp. 3.14-40–3.14-44) at the project site and in the vicinity of Heron's Head Park. As detailed in Impact BI-1, both State (California Fish and Game Code) and Federal (Migratory Bird Treaty Act) regulations mandate protection of native, migratory, and nesting birds, their eggs, and nests. Furthermore, the Draft EIR recommended Mitigation Measure M-BI-1d, "Avoid Ridgway's Rail Habitat during the Nesting Season," which requires construction activities within 700 feet of Heron's Head Park to either avoid the Ridgway's rail nesting season (February 1 through August 31) or requires a U.S. Fish and Wildlife Service–approved protocol-level survey for purposes of identifying and avoiding special-status birds to be conducted prior to such construction. The Draft EIR also proposed Mitigation Measure M-BI-1e, "Avoid Nests during Bird Nesting Season," which requires construction to either avoid the nesting season (February 1 through August 31) or requires preconstruction surveys for purposes of identifying and avoiding nesting birds to be prepared prior to such construction. This nesting bird survey window is intended to catch early and late nesters and avoid impacts to nesting birds in compliance with the Migratory Bird Treaty Act and Fish and Game Code. Thus, the Draft EIR identified the presence of migratory waterbird and nesting bird species and respective habitat, assessed potential impacts to these bird species as a result of the proposed project and variant, and identified mitigation measures as needed.

The project would comply with Standards for Bird Safe Buildings, as required by Section 139 of the Planning Code, as well as follow the San Francisco Better Streets Plan. Compliance with these standards, resulting in the elimination of unnecessary light pollution from the project, adequately reduces the potential for light pollution to impact migratory birds and waterfowl. The language below has been integrated into the Operation section of Impact BI-5 in the Draft EIR, Section 3.14, "Biological Resources," on pp. 3.14-54–3.14-55 with regard to lighting impacts on migrating birds; however, these revisions and clarifications do not change the analysis, conclusions, or mitigation measures of the Draft EIR. In addition, these changes would not increase the severity of any impacts to biological resources identified in the Draft EIR.

### ***Operation***

#### *India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties*

Project operations under either the proposed project or the variant are not expected to result in the removal of trees regulated under the Urban Forestry Ordinance; therefore, project operations would not

conflict with the Urban Forestry Ordinance. The proposed project or variant would result in additional lighting that could have a significant impact on migrating birds. Lighting in the project would comply with Standards for Bird-Safe Buildings, as required by Section 139 of the Planning Code, and would follow the San Francisco Better Streets Plan. These documents identify requirements and recommendations for reducing light pollution by minimizing perimeter and vanity lighting, filtering light, and designing light fixtures so that light does not escape upward. The elimination of unnecessary light pollution is anticipated to reduce the potential for lighting from the proposed project or variant to significantly impact migratory birds. At all four project site properties, the operational impact of either the proposed project or the variant related to consistency with local biological protection plans and policies would be *less than significant*. No mitigation measures are necessary.

Also, to clarify the project sponsors' actions and project requirements, the language below has been added to page 2-37 of Draft EIR Chapter 2.0, "Project Description," to further detail project compliance with Standards for Bird-Safe Buildings, as required by Section 139 of the Planning Code and the San Francisco Better Streets Plan. These revisions do not change the analysis, conclusions, or mitigation measures of the Draft EIR, nor would these changes increase the severity of any impacts to biological resources identified in the Draft EIR:

Proposed structures would be constructed to comply with the San Francisco Green Building Ordinance standards, which establish Leadership in Energy and Environmental Design (LEED) certification levels or GreenPoint Rated system points for various types of buildings. Specifically, the proposed RPD development would be constructed to a LEED Gold rating or equivalent, and the BUILD development would be constructed to a LEED Silver rating or equivalent. On the India Basin Shoreline Park property, wildlife-proof trash and recycling containers would be installed. In addition, all buildings and lighting would follow the provisions of the San Francisco Better Streets Plan for lighting and San Francisco's Standards for Bird Safe Buildings as required by Section 139 of the Planning Code. Because of the length of the buildout period for the RPD properties, the design details of individual buildings and structures would be further refined as specific building permits are sought.

Habitat, including shoreline area, is vital to bird species, especially migratory shorebirds. The existing conditions of the shoreline at each of the properties associated with the project is primarily developed and disturbed with tidal marsh in some locations, which would be improved and expanded as part of the project. Although migratory birds and waterfowl still use open water habitat adjacent to these developed and disturbed shorelines, the overall quality of the habitat has been degraded by this previous disturbance and development. Migratory waterfowl are more likely to use open water habitat that is adjacent to natural shorelines, such as tidal marsh. Per Mitigation Measure M-BI-1c, "Prepare and Implement a Vegetation Restoration Plan and Compensatory Mitigation," the proposed project or variant would be required to create or restore sensitive natural communities at a ratio of no less than 1:1 and replace approximately 0.64 acre of existing shoreline (primarily disturbed or developed) of the project site with tidal marshland. This additional tidal marsh would improve the quality of shorebird habitat at the project site, as well as provide a buffer between human occupied areas (residential and recreational areas) and shorebirds habitat. Thus, the quality of habitat at India Basin for nesting and migratory birds would significantly improve. Replacement of disturbed and developed land with natural tidal marsh habitat, seasonal wetlands, mudflat, upland buffer, and transitional habitat, including the planting of native tidal marsh species, would provide foraging and resting habitat for migrating shorebirds. In addition, the creation of additional tidal marsh

along the shoreline would improve the overall quality of habitat in the region and of the shoreline corridor, which would benefit adjacent natural habitats such as Heron's Head Park and the species that use them. Impacts resulting from increased human presence would be offset by these improvements to habitat. Due to the inherent nature of tidal marsh as a muddy and tidally inundated vegetation community, tidal marsh would discourage pedestrian traffic and thereby be naturally protected from pedestrians. As stated previously, similar to all RPD parks, the India Basin Open Space property would also include park rules and etiquette signage indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. The buffer resulting from these created tidal marsh areas would adequately reduce any potential impacts from human noise or disturbance that could result in flushing of individual birds (potentially depleting energy reserves).

Migratory shorebirds may choose to temporarily utilize adjacent habitat (such as Heron's Head Park) while restoration of tidal marsh and wetlands is occurring; however, the project is not expected to result in habitat abandonment because Mitigation Measure M-BI-1b, "Implement Avoidance and Minimization Measures for Special-Status Species," and Mitigation Measure M-BI-1e, "Avoid Nests during Bird Nesting Season," described on p. 3.14-33 and p. 3.14-42 of the Draft EIR, respectively, would be implemented to reduce impacts on birds during construction at any of the four project site properties.

To clarify the project sponsors' actions, the following text has been added to EIR Project Description to detail such signage and roping). These revisions and clarifications do not change the analysis, conclusions, or mitigation measures of the Draft EIR and do not warrant recirculation under CEQA Guidelines Section 15088.5.

The fifth full paragraph of the Draft EIR Section 2.3.4, "Landscaping," on p. 2-40 has been revised as follows:

The Marsh Edge area would be restored by replacing the hard riprap edge along India Basin Shoreline Park with a soft, vegetated buffer that would provide habitat for birds and animals and improve the park's ability to adapt to sea-level rise and storm surges. The India Basin Shoreline Park would also include interpretive signage or exhibits educating park visitors about the area's history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The last paragraph of the Draft EIR Section 2.3.4, "Landscaping," on page 2-40 and continuing to p. 2-41 has been revised as follows:

On the 900 Innes property, the proposed Scow Schooner Boatyard area would include shoreline plantings, a water feature, seating and picnic tables, and restored artifacts from the boatyard, such as the marine way rails and potentially the Tool Shed interpretive structure. The existing concrete surface at the boatyard would remain in place wherever possible and resurfaced to create an ADA-compliant surface, and selected areas of crumbling concrete could be replaced with tidal marsh wetlands. Historic pathway locations would be identified and highlighted through the use of contextual materials and the historic yard areas would be retained as an open area with minimal plantings. The 900 Innes property would also



include interpretive signage or exhibits educating park visitors about the area's history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including prohibiting dogs from being off-leash and people from walking off-trail into sensitive habitat areas. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The second full paragraph of the Draft EIR Section 2.3.4, "Landscaping," on p. 2-41 has been revised as follows:

Existing wetlands and tidal marshes on the India Basin Open Space property would be enhanced and new tidal marsh would be created in the property's northwest and northeast sections. Approximately 0.31 acre of new seasonal wetland would be created. Native and adaptive species would be planted. There would also be an elevated pedestrian boardwalk, pier, and gravel beach. The India Basin Open Space property would also include interpretive signage or exhibits educating park visitors about the area's history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

In addition, to clarify the extent to which India Basin and surrounding areas provides suitable open water habitat for migratory shorebirds, the following revisions have been made to Impact BI-4 in Draft EIR Section 3.14, "Biological Resources," on pp. 3.14-53–3.14-55. The Draft EIR focused on habitat along the shoreline, which is developed and disturbed; whereas revisions to the text also provide information on open water habitat adjacent to the shoreline. These revisions are intended to clarify the existing conditions of the site, but do not change the analysis, conclusions, or mitigation measures of the Draft EIR. In addition, these changes would not increase the severity of any impacts to biological resources identified in the Draft EIR. As stated previously, replacement of disturbed and developed land with natural tidal marsh habitat, including the planting of native tidal marsh species, would provide foraging and resting habitat for migrating shorebirds. In addition, the creation of additional tidal marsh along the shoreline would improve the overall quality of habitat in the region and of the shoreline corridor, which would benefit adjacent natural habitats such as Heron's Head Park and the species that use them. The two paragraphs under "Migratory Birds" on Draft EIR p. 3.14-53 are revised as follows, and a new third paragraph has been added.

### ***Construction***

*India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties*

### **Migratory Birds**

~~Because the project site and surrounding areas are highly developed and disturbed, the San Francisco shoreline in the project area does not provide a movement corridor for terrestrial wildlife. Open water, and mudflat habitats along the shoreline provide stopovers for migratory shorebirds birds, including but~~

not limited to ducks, geese, grebes along the Pacific Flyway, a major migration route in North America. Despite this important habitat for migratory birds, the current condition of the project area is primarily developed and disturbed, offering only low quality habitat for birds to forage and nest. San Francisco Bay, including open water and mudflat habitat in India Basin, is a known overwintering site for shorebirds. As discussed previously in Impact BI-1a, construction of the project may affect the ability of migratory birds to forage, nest, or stop over in the project vicinity, because habitat would be temporarily removed and both noise levels and human presence would increase. This would be particularly true for shorebirds during the migration season, between November and March. The construction impact of the proposed project or variant on migratory birds and their corridors could be significant.

Mitigation Measure M-BI-1e, “Avoid Nests during Bird Nesting Season,” presented above, would be implemented under either the proposed project or variant to reduce this significant impact of construction at any of the project site properties on migratory birds nesting in the project area. This measure would require nesting bird surveys and construction buffers for active nests. Temporary removal of habitat for migratory birds would be primarily offset by the creation or restoration of sensitive natural communities at a ratio of no less than 1:1 and the additional replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland. Adding this tidal marsh habitat along this section of shoreline would improve habitat connectivity between patches of tidal marshland to the north and south, and would strengthen the Bay’s shoreline as a corridor for migratory birds. ~~Implementing Mitigation Measure M-BI-1e Temporary removal of habitat for migratory birds would be primarily offset by the creation or restoration of sensitive natural communities at a ratio of no less than 1:1 and the additional replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland. Adding this tidal marsh habitat along this section of shoreline would improve habitat connectivity between patches of tidal marshland to the north and south, and would strengthen the Bay’s shoreline as a corridor for migratory birds. Implementing Mitigation Measure M-BI-1e would reduce the construction-related impact of either the proposed project or the variant on migratory birds nesting in the project area to less than significant with mitigation.~~

Per Mitigation Measure M-BI-1c, “Prepare and Implement a Vegetation Restoration Plan and Compensatory Mitigation,” the proposed project or variant would be required to create or restore sensitive natural communities at a ratio of no less than 1:1 and replace approximately 0.64 acre of existing shoreline (primarily disturbed or developed) of the project site with tidal marshland. Also, per Mitigation Measure M-BI-1e, “Avoid Nests during Bird Nesting Season,” the proposed project or variant would be required to either avoid the nesting season (February 1 through August 31) or prepare preconstruction surveys for purposes of identifying and avoiding nesting birds prior to such construction. Implementation of these mitigation measures would reduce the construction-related impact of either the proposed project or the variant on migratory birds nesting at the project site and in the surrounding area to less than significant with mitigation.

#### Migrating Marine Mammals, Fish, and Their Corridors

As discussed previously, underwater noise from construction could result in temporary removal of open water and tidal marsh habitat for marine mammals and fish species. Harbor seals, California sea lions, and

various fish species forage throughout the Bay. Therefore, underwater noise from construction could cause marine mammals to avoid the project area while migrating to or from haul-out sites or during foraging, and could cause fish to avoid the project area during foraging. The construction impact of the proposed project or variant on migrating marine mammals, fish, and their corridors could be significant.

Although in-water work has the potential to affect the behavior of migrating species, construction activities and structures in the water would not act as physical barriers to migration. With Mitigation Measure M-BI-1a, "Prepare and Implement a Hydroacoustic Monitoring Program for Special-Status Fish and Marine Mammals," a hydroacoustic monitoring program for special-status fish and marine mammals reviewed and approved by NMFS would minimize impacts of underwater noise on these species. In addition, because the existing habitat on these properties is degraded and a relatively large amount of surrounding open water habitat is available, the temporary removal of aquatic habitat for fish and marine mammals in the project vicinity is unlikely to impede fish or marine mammal movement up or down the shoreline. Furthermore, as discussed for migratory birds, temporary removal of habitat for marine mammals and fish would be primarily offset by the creation or restoration of sensitive natural communities at a ratio of no less than 1:1 and the additional replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland.

Implementation of Mitigation Measures M-BI-1a and M-BI-1e, the restoration of temporarily affected habitats at a 1:1 ratio, and the additional creation of 0.64 acre of tidal marshland would reduce the construction-related impact of either the proposed project or the variant on wildlife corridors to *less than significant with mitigation*.

### ***Operation***

#### *India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties*

Birds have the potential to collide with the newly constructed buildings on the project site. Adding open space areas adjacent to developed areas would create bird habitats near proposed buildings and other facilities, potentially increasing risks of bird collisions. Newly constructed buildings would be in compliance with the adopted Standards for Bird-Safe Buildings, as required by Section 139 of the Planning Code. The Standards for Bird-Safe Buildings include requirements for façades, glazing, and lighting to prevent bird collisions. Therefore, operation of the proposed project or variant would not adversely affect resident or migratory birds by increasing the risk of collisions with new buildings or structures.

The proposed project or variant would result in additional lighting that could have a significant impact on migrating birds. Lighting in the project would comply with Standards for Bird-Safe Buildings, as required by Section 139 of the Planning Code, and would follow the San Francisco Better Streets Plan. These documents identify requirements and recommendations for eliminating light pollution by minimizing perimeter and vanity lighting, filtering light, and designing light fixtures so that light does not escape upward. The elimination of unnecessary light pollution is anticipated to reduce the potential for lighting from the proposed project or variant to significantly impact migratory birds.

Following the construction of the proposed project or the variant, human presence along the shoreline at India Basin is anticipated to increase. In addition, with the inclusion of kayak launching for the proposed project or variant, human presence within open water habitat in India Basin would increase. Increased human presence and noise could have negative effects on migratory shorebirds, including ducks, geese, grebes, and other shorebirds in the project area. RPD on-water programming would occur between April and October, and therefore would not overlap with the migration season. This would limit human disturbance of migrating shorebirds. Additionally, the replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland would increase opportunities for migratory shorebirds to stop over at India Basin after implementation of the project. This additional tidal marsh would improve the quality of shorebird habitat within the project area, and would provide a buffer between human occupied areas (residential and recreational areas) and shorebirds habitat.

With the replacement of approximately 0.64 acre of existing shoreline with tidal marsh, compliance with Section 139 of the Planning Code, and implementation of seasonal suspension of on-water RPD programming all four project site properties, operational impacts of either the proposed project or the variant on wildlife corridors would be *less than significant*. No mitigation measures are necessary.

Text also has been added to Draft EIR Chapter 2.0, “Project Description,” and Section 3.14, “Biological Resources,” to further clarify the project sponsors’ actions. These revisions do not change the analysis, conclusions, or mitigation measures of the Draft EIR.

The third full paragraph of Draft EIR Section 2.3.5, “Shoreline and In-Water Uses,” on p. 2-41 has been revised as follows:

Finally, a gravel beach would be created at the end of the grass Marineway for people to sit or kayakers to launch boats during higher tides. Between November and March, no RPD programming involving on-water activities would be scheduled. In addition, RPD has located the India Basin Shoreline Park parking lot adjacent to the pier to prevent the transport of hand-powered boats through sensitive shoreline habitat.

In conclusion, aforementioned revisions and clarifications would not result in any new significant impacts that were not already identified in the Draft EIR, increase the severity of any impacts to biological resources identified in the Draft EIR, or require changes to the mitigation measures identified in the Draft EIR.

### **Recirculation**

To address the commenters request that the Draft EIR be rewritten and recirculated, the project sponsors have added revisions and clarifications to the Draft EIR project description; however, these revisions and clarifications do not change the analysis, conclusions, or mitigation measures of the Draft EIR. As such, these changes do not warrant recirculation under CEQA Guidelines Section 15088.5, which states that “*new information added to a Draft EIR is not significant unless the Draft EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. Significant new information requiring recirculation includes, for example, a disclosure showing that:*

- (1) *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.”*

The project sponsors have added revisions and clarifications to the Draft EIR project description; however, no new significant environmental impacts would result from these revisions, and no new mitigation measures are proposed to be implemented.

- (2) *“A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.”*

As detailed in Responses BI-1 through BI-5, no substantial increases in the severity of environmental impacts have been identified. As such, no new mitigation measures are proposed to be implemented.

- (3) *“A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponents decline to adopt it.”*

No project alternatives have been identified or proposed by Comments BI-1 through BI-5. Revisions and clarifications have been made to the Draft EIR project description, but no new mitigation measures have been proposed.

- (4) *“The Revised Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”*

The Draft EIR was adequate to allow meaningful public review and comment. Revisions and clarifications have been made to the Draft EIR project description and to some existing conditions and impact analysis; however, these revisions and clarifications do not significantly alter the content of the Draft EIR in such a way that additional public review is warranted.

## **COMMENT BI-2: BIRD SAFE BUILDING GUIDELINES**

- **O-GGAS/SC-11**

“Section 3.1 Environmental Planning -The document does not mention the Standards for Bird Safe Buildings as approved by the City of San Francisco and included as a planning ordinance. Standards for Bird Safe Buildings is listed as one of the San Francisco Planning Department ordinances yet the Biological Resources section of the EIR does not mention bird strikes as a risk from the development. The EIR does not list the implementation of the Standards for Bird Safe Building guidelines as a way to address the significant bird strike risk.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-11]*)

### **RESPONSE BI-2**

The comment states that the Draft EIR does not mention the Standards for Bird-Safe Buildings or bird strikes as a risk associated with the proposed project or variant. The Draft EIR details Standards for Bird-Safe Buildings as

required by Section 139 of the Planning Code in Section 3.14.2, “Regulatory Framework – Local,” on p. 3.14-22. The Draft EIR also identified the potential for bird strikes from development under Impact-BI-1 on pp. 3.14-54–3.14-55, which states: “Birds have the potential to collide with the newly constructed buildings on the project site. Adding open space areas adjacent to developed areas would create bird habitats near proposed buildings and other facilities, potentially increasing risks of bird collisions. Newly constructed buildings would be in compliance with the adopted Standards for Bird-Safe Buildings, as required by Section 139 of the Planning Code. The Standards for Bird-Safe Buildings include requirements for façades, glazing, and lighting to prevent bird collisions. Therefore, operation of the proposed project or variant would not adversely affect resident or migratory birds by increasing the risk of collisions with new buildings or structures.”

### **COMMENT BI-3: PLANTINGS AT THE PROJECT SITE**

- **O-GGAS/SC-9**

“The project site was a mitigation site from the fill that was placed to create the San Francisco Airport. An endangered plant the California Sea Blight or *Californica Suaeda* was present during the monitoring of the SFIA mitigation project but is no longer present. This is a site that is maintained by SF Rec and Parks Department. Future planting of this endangered plant (California Sea Blight) which formerly was along the shoreline of San Francisco Bay but is now rare due to development and landfill should be facilitated, too. This endangered plant is now thriving nearby at Pier 94 and it is present at Heron’s Head Park. SF State University students are studying this plant and shoreline conditions to evaluate planting at additional wetland sites. Maintenance of the shoreline is important. We anticipate this huge shoreline development, adjacent development from the Hunters Point Shipyard and enhancements of the Blue Greenway, Candlestick State Recreation Area as well as population growth in other parts of San Francisco with the need for people to enjoy nature and recreate. All of these changes will make maintenance (removing trash and weeds) critical to maintaining safe healthy habitat for birds and places where the existing and new human residents will recreate. The EIR should address the management of this site. This is an impact that needs to be addressed including funding for the management.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-9]*)

### **RESPONSE BI-3**

This comment requests that planting of California seablight (*Suaeda californica*) be facilitated and maintained. This is not a comment on the adequacy or accuracy of the EIR. The San Francisco Recreation and Parks Department is committed to constructing a sustainable and resilient park and is open to exploring appropriate locations for planting California seablight during the more-detailed landscape design phase of the project.

The comment also states that the EIR should address the management and funding of the site. Management and funding of the open spaces proposed, including India Basin Shoreline Park, the 900 Innes property, India Basin Open Space, and the Big Green on the 700 Innes property, is being negotiated as part of the project’s Development Agreement. Furthermore, financing and funding of projects is outside the purview of CEQA and

therefore is not required to be addressed in this Draft EIR.<sup>64</sup> The park maintenance standards manual provides a framework for periodically inspecting and evaluating the condition of tangible features of each park relative to the established standards. In addition, funding for the maintenance of the site would be provided by the City's general fund, which is funded through a variety of sources, including sales taxes, property taxes, state revenue, business registration and payroll taxes, federal revenue, hotel room taxes, charges for services, and others, as well as a community facilities district (CFD). BUILD intends to form a CFD to generate special tax revenue on a bi-annual basis (collected on the bi-annual property tax bills) from all newly completed residential units and commercial floor area. A portion of the special tax revenue will be used to pay for maintenance and operations of the publicly accessible streets, plazas, and parks within all four properties that comprise the project site. The money collected would include some set-aside for a capital repair/reserve fund.

The CFD would fund the ongoing maintenance above and beyond the maintenance services provided by the City (SFPW and RPD) for: 1) all new or redesigned ROWs that will be owned by SFPW; 2) existing and future open space and wetlands (India Basin Open Space, Big Green, 900 Innes, and India Basin Shoreline Park) that will be owned by RPD; and 3) privately owned, but publicly accessible transitional open spaces that are generally located between the 700 Innes property and the adjacent open spaces. Maintenance services may include but would not be limited to additional street and sidewalk power washing; management and operation of non-standard maintenance vehicles; programming for the publicly accessible parks and plazas; and ongoing education and volunteer programs for residents, commercial occupants, park users, and the broader Bayview neighborhood on the sustainability, habitat restoration, and resiliency goals of the India Basin plan. No changes to the EIR are necessary in response to this comment.

#### **COMMENT BI-4: WETLANDS IMPACTS**

- **O-GGAS/SC-6**
- **O-GGAS/SC-12**

“The DEIR does acknowledge a mitigation tidal salt marsh that was created as a result of a 2002 wetlands mitigation project for the San Francisco International Airport, and occupies 2.5 acres of the India Basin Open Space. The DEIR admits that these habitat management and protection areas in India Basin Open Space are fenced from public access. However, the DEIR fails to recognize this as an indicator that marshes and the wildlife species that inhabit them do need some measure of protection.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-6]*)

“The historic interpretive displays should provide public education and outreach regarding the rich natural history of this site along San Francisco Bay and the changes over time including the loss of wetlands and wildlife that the City has experienced. The India Basin Shoreline Park offers a key opportunity to restore, enhance and inform the public about the importance of wetlands especially as climate change and sea level rise threaten these areas.

<sup>64</sup> San Francisco Recreation and Parks Department, San Francisco Park Maintenance Standards: The Manual and Evaluation Form, [http://sfcontroller.org/sites/default/files/FileCenter/Documents/882-SFPark\\_Mainten\\_Standards\\_Aug\\_2006FINAL4.pdf](http://sfcontroller.org/sites/default/files/FileCenter/Documents/882-SFPark_Mainten_Standards_Aug_2006FINAL4.pdf); accessed May 18, 2018.

Wetlands cleanse the water that flows into the Bay, create oxygen for people, sequester carbon AND provide habitat for birds and other wildlife. All of these ecological services make wetlands important and make it important to share the benefits of properly respecting and stewarding local wetland habitats for urban communities.” (Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinstein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-12])

#### **RESPONSE BI-4**

The comments state that the Draft EIR should acknowledge the importance of nearby wetland mitigation plans and the need to protect them from public access. The comments on this topic also request that interpretive displays at the project site provide public education and outreach regarding the importance of wetlands and about the rich natural history of India Basin.

The comment agrees that the proposed project and variant’s inclusion of recreational opportunities, including interpretive signage, as part of the India Basin Shoreline Park is important. As stated on p. 2-13 in Draft EIR Chapter 2.0, “Project Description,” two of the objectives of the RPD Development are to design a landscape that would be adaptive and resilient alongside anticipated sea-level rise and to conserve and strengthen natural resources, increase biodiversity and interconnectivity on City parkland, through the expansion of shoreline wetlands and redevelopment of natural upland landscaping. By including these objectives in the Draft EIR Project Description, RPD is committed to constructing a sustainable and resilient park.

This is not a comment on the adequacy or accuracy of the Draft EIR. However, the following text in the Draft EIR Section 2.3.4, “Project Description,” on p. 2-40 has been expanded to further emphasize the importance of communicating the rich natural history of the site to the public through interpretive exhibits or educational signage. These revisions do not change any of the analysis or conclusions of the EIR, and are being added for informational purposes only.

The Marsh Edge area would be restored by replacing the hard riprap edge along India Basin Shoreline Park with a soft, vegetated buffer that would provide habitat for birds and animals and improve the park’s ability to adapt to sea-level rise and storm surges. The India Basin Shoreline Park would also include interpretive signage or exhibits educating park visitors about area’s history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

#### **COMMENT BI-5: CUMULATIVE BIOLOGICAL IMPACTS**

- **GGAS/SC-10**

“The project site mentions the adjacent developments at the Hunters Point Shipyard yet this is not considered in the EIR as part of the cumulative impacts. The huge population increase will have dramatic impacts to the



shoreline park resource.” (*Cindy Margulis, Executive Director, Golden Gate Audubon Society, and Arthur Feinsein, Sierra Club, Golden Gate Audubon Society/Sierra Club, Email, October 30, 2017 [O-GGAS/SC-10]*)

## **RESPONSE BI-5**

The comment is concerned that the adjacent areas and associated developments are not considered in the EIR as part of the cumulative analysis, especially with regard to impacts on shoreline resources. The potential cumulative impact of additional developments that would add dwellings is included in Draft EIR Section 3.14.4, “Cumulative Impacts,” on p. 3.14-56. This section states the following: “Construction of the proposed project or variant in combination with the projects identified in Table 3-1, especially those that increase development and human presence along the shoreline by adding dwellings (e.g., Candlestick Point and Hunters Point Shipyard), could potentially result in significant cumulative impacts on special-status species and their habitats. Because the shoreline acts as a corridor for bird and fish movement, additional development along the shoreline results in cumulative impacts on the movement of common and special-status species.”

The Draft EIR indicates that “the majority of the project site consists of developed land, disturbed infill, mixed and maintained landscaping, bare soil, sand, gravel, concrete debris, and riprap (Table 3.14-1). The small portions of habitat (tidal marsh and coastal scrub) that still exist at the project site were identified as being of poor quality and do not provide habitat for some of the Bay’s most threatened and endangered species—Ridgway’s rail, California black rail, and salt marsh harvest mouse.” “The creation and enhancement of tidal marsh habitat planned for the India Basin Shoreline Park and India Basin Open Space properties would improve the quality of habitat at the project site, and would result in more suitable habitat for special-status species. When considered relative to the cumulative impact on biological resources caused by past development, the proposed project or variant would restore portions of the project site that are most beneficial to species—tidal marshland.”

The Draft EIR comes to the determination that, “overall, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, would not result in significant adverse impacts on biological resources. Therefore, the cumulative construction-related impact on biological resources would be less than significant.”

## **P. Hydrology and Water Quality**

The comment and corresponding response in this section relate to the topic of Hydrology and Water Quality, evaluated in Draft EIR Section 3.15. The comments are grouped by the following issue:

- HY-1: Effects of Sea Level Rise

## COMMENT HY-1: EFFECTS OF SEA LEVEL RISE

- **O-GA2-14**
- **I-Jennison-3**

“XIV. Impact of Sea Level Rise:

The DEIR fails to discuss or evaluate the impact sea level rise will have on the proposed project, including homes, businesses, infrastructure, and the hazardous waste contamination that may be left at the site.

The DEIR states “The project site is subject to flooding from sea-level rise, but the proposed project or variant would not exacerbate the frequency or severity of flooding or cause flooding in areas otherwise would not be subject to flooding without the project.” This proposed project may or may not “exacerbate the frequency or severity flooding,” but will be impacted by rising sea levels and storm surges associated with climate change.

The San Francisco Bay Conservation and Development Commission and the San Francisco Department of the Environment are predicting a sea level rise of 11 to 19 inches by 2050 and 30 to 55 inches by 2100. An increase of sea level will cause coastal flooding, storm surges, coastal erosion/shoreline retreat, rising groundwater and wetland loss. Communities living near San Francisco Bay, such as Bayview Hunters Point, are extremely vulnerable to flooding from sea level rise - and this includes the proposed India Basin project site.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-14]*)

---

“I think that what we have to realize, that by being a planning commission, hopefully you have all seen the area, but if you look to what it would be if we used eminent domain and made it all a park area, that way you would have a buffer zone for the tidal area. In the existing EIR report for the park, they talk about putting basketball courts and such down near the water. To me, that is detrimental to the tidal area. All the area in 900 Innes is landfill. What’s going to happen with the compression? Will the City be on the hook in 60 years to build a sea wall to protect the property that’s been –the taxpayers that will be paying there? I don’t think that’s being taken into consideration.” (*Ellsworth Jennison, Neighbor, Draft EIR Hearing Transcript, October 19, 2017 [I-Jennison-3]*)

## RESPONSE HY-1

The comment asserts that the Draft EIR fails to discuss or evaluate the impact sea-level rise will have on the proposed project, including homes, businesses, infrastructure, and the hazardous waste contamination that may be left at the site. A comment also suggests using eminent domain to make the project site all park area to provide a buffer for the tidal area.

The Draft EIR contains an analysis of the potential impacts of sea-level rise on the proposed project and variant in Section 3.15, “Water Quality and Hydrology,” under Impact HY-6, beginning on p. 3.15-52. As stated in the Approach to Analysis of Draft EIR Section 3.15, “Water Quality and Hydrology,” on p. 3.15-25, in *California Building Industry Association v. Bay Area Air Quality Management District* (62 Cal.4th 369), decided in 2015, the California Supreme Court held that CEQA does not generally require lead agencies to consider how existing

hazards or conditions might affect a project's users or residents, except where the project would exacerbate an existing environmental hazard. Accordingly, for example, flood hazards resulting from a project that places development in an existing or future flood hazard area are not considered impacts under CEQA unless the project would exacerbate the flood hazard. Thus, the analysis below evaluates whether the proposed project or variant would exacerbate existing or future flood hazards in the project area, resulting in a substantial risk of loss, injury or death. The impact would be considered significant if the proposed project or variant were to exacerbate future flood hazards by increasing the frequency or severity of flooding or cause flooding to occur in an area that would not be subject to flooding without the project.

The Draft EIR uses sea-level rise projections from the National Research Council of the National Academies of Sciences, Engineering, and Medicine's 2012 *Sea Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future*. The California Coastal Commission and the City and County of San Francisco Sea Level Rise Committee for the San Francisco Capital Planning Committee support use of the National Research Council projections for sea-level rise analysis. A discussion of the projections and recommendations for use by the City of San Francisco is presented in Draft EIR Section 3.15, "Water Quality and Hydrology," on pp. 3.15-7–3.15-9. The sea-level rise scenarios used for the analysis under Impact HY-6 can be found on pp. 3.15-52 and 53 of the Draft EIR and include mean higher high water plus 12 inches by 2050, mean higher high water plus 36 inches by 2100, 1 percent annual flood hazard area plus 24 inches by 2050, and 1 percent annual flood hazard area plus 66 inches by 2100.

The comment also states that the basketball courts would be located near the water. The proposed basketball and playground facilities would not be located next to the Bay and they would not be within the tidal area or within an area that may be inundated due to sea-level rise. As stated on p. 3.15-58, "Facilities at the India Basin Shoreline Park property that would be inundated by 2050 as a result of sea-level rise include the pier, the dock/platform, the beach, portions of some pedestrian paths, and a portion of the Marineway path." As stated on Draft EIR p. 3.15-59, "Based on the elevation of the 1 percent annual flood hazard area in combination with the high estimate of sea-level rise by 2100, the kayak concessions, portions of the Bay Trail near the southern shoreline, the parking area, a larger portion of the Marineway, and additional portions of the pedestrian paths would be temporarily inundated." The Draft EIR states on p. 3.15-60 that under any of the four sea-level rise scenarios presented, no inhabited structures at the 700 Innes property would be inundated by sea-level rise.

A comment expresses concern that the project is located on landfill that could be compressed with development and suggests that a seawall may be needed to protect the property and address the tidal area and sea-level rise. Facilities at 900 Innes that would be inundated by 2050 as a result of sea-level rise would include piers, docks, beaches, paths, an ADA-accessible ramp, artifact area, grassy areas, wetlands, and a beach deck. These same uninhabited facilities would also be inundated by 2100 as a result of sea-level rise. As stated on Draft EIR p. 3.15-59, "Based on the elevation of the 1 percent annual flood hazard area in combination with the high estimate of sea-level rise by 2100, an additional portion of the existing concrete dock and artifact area would be temporarily inundated along with some stairs, basically the area up to the base of the shop building on either side of the building." As stated in the Draft EIR under Impact HY-6, most of the uninhabited facilities have been sited and designed so that sea-level rise would not affect the planned uses over their 50-year design life; however, beyond the 50-year design life of the pier and path, future project designs would need to incorporate the sea level at the time into design to address these anticipated effects. As stated in the Draft EIR under Impact HY-6, the

inhabited facilities that are part of the proposed project and variant have been designed to be located where they would not be affected by sea-level rise.

As stated on Draft EIR p. 3.15-58, although in-water and shoreline facilities such as piers, docks, and beaches would be inundated by sea-level rise, these facilities would not alter wave/water circulation and flows and would not promote substantial shoreline erosion. Other facilities would also be inundated by sea-level rise, including paths, an ADA-accessible ramp, artifact area, grassy areas, wetlands, and a beach deck. These facilities have been adapted for sea-level rise, are primarily flat and would not channelize sea-level rise waters and propel water further up in elevation during storm surges, resulting in additional areas of or more severe flooding. Overall, although some project features at the project site properties may be inundated by sea-level rise, the proposed project or variant would not exacerbate the frequency or severity of flooding or cause flooding in areas that otherwise would not be subject to flooding without the project. Therefore, under either the proposed project or variant, the operational impact would be less than significant.

The comment suggests that if the entire project were a park, it would be a buffer zone for the tidal area. The comment also suggests that a seawall may be necessary in 60 years to protect the property. Draft EIR Chapter 4.0, "Alternatives," explored the 100 Percent Open Space/Park Use Alternative under Section 4.9.4 on p. 4-75. This alternative introduces the concept of using the entire site for open space and park purposes that would be owned and operated by RPD. This section further explains the open space/park alternative was eliminated because the funds would not be available to develop the entire site for this use. The cost of waterfront land in San Francisco is at a premium and the cost to clean up hazardous materials is also very high, making use of the site entirely as parkland infeasible. In addition, the Project Description for the Draft EIR describes project features that would function as a buffer zone for the tidal area and help adapt to sea-level rise. These features include the Marsh Edge, which would be 0.64 acre of new tidal marsh and wetlands at the India Basin Shoreline Park property (see p. 2-28 in Draft EIR Chapter 2.0, "Project Description"); 0.2 acre of new tidal marsh at the 900 Innes property (see p. 2-18 in Draft EIR Chapter 2.0, "Project Description"); 0.3 acre of new tidal marsh proposed at the India Basin Open Space property (see p. 2-19 in Draft EIR Chapter 2.0, "Project Description"); and 0.64 acre of new tidal marsh and wetlands (see p. 2-29 in Draft EIR Chapter 2.0, "Project Description"). Regarding the comment about the need for a seawall to protect the project site, this is addressed on p. 3.15-60, which states that no inhabited structures at the 700 Innes property would be inundated by sea-level rise. Furthermore, financing and funding of projects is outside the purview of CEQA and therefore is not required to be addressed in this Draft EIR.

No changes to the EIR are required in response to this comment.

## **Q. Hazards and Hazardous Materials**

The comments and corresponding responses in this section relate to the topic of Hazards and Hazardous Materials, evaluated in Draft EIR Section 3.16. The comments are further grouped by the following issues:

- HZ-1: Potential Effects of Site Contamination
- HZ-2: Proximity of Nearby Historically Contaminated Sites
- HZ-3: Leaking Underground Storage Tanks

## COMMENT HZ-1: POTENTIAL EFFECTS OF SITE CONTAMINATION

- **O-GA2-2**

“II. Greenaction does not oppose the Recreation and Parks Department component of the project, except all toxic contamination must be remediated and the project must not contribute to gentrification:

The people of Bayview Hunters Point deserve more open space and parks, but the open space and parks must be safe and free of toxic contamination.

The San Francisco Recreation and Parks Department has been responsive to input and concerns about toxic contamination at the site, and it appears they are addressing the contamination issue.

However, we remain concerned with the plans in the RPD component of the project that would result in increased subsistence fishing and consumption by low-income people and their families and friends of toxic-contaminated fish from the Bay. This concern can be partially remedied by the placing of multilingual fish advisory signs along the waterfront, and a Healthy Subsistence Fishing community education project such as the pilot project currently being conducted by Greenaction in partnership with RPD.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-2]*)

### RESPONSE HZ-1

The comment does not oppose the RPD components of the proposed project and variant but expresses concern regarding the existing contamination and remediation required. The comment is concerned about people fishing and consuming contaminated fish. The comment suggests that multilingual advisory signs be placed along the Bay on the project site and that a community education project be undertaken involving RPD and other organizations.

As noted in Draft EIR Section 3.11, “Recreation,” on p. 3.11-6, Policy 3(a)(8) of the San Francisco Bay Plan<sup>65</sup> states that “to reduce the human health risk posed by consumption of contaminated fish, projects that create or improve fishing access to the Bay at water-oriented recreational facilities, such as fishing piers, beaches, and marinas, should include signage that informs the public of consumption advisories for the species of Bay fish that have been identified as having potentially unsafe levels of contaminants.”

The project sponsors intend to comply with this policy and would install multilingual fish advisory signs at appropriate locations on the project site.

In response to this comment, the following text changes, double-underlined below, have been made to paragraphs in the Draft EIR, Chapter 2.0, “Project Description,” on p. 2-29:

<sup>65</sup> The San Francisco Bay Plan originally was adopted in 1968 and has been amended through 2011, [http://www.bcdc.ca.gov/plans/sfbay\\_plan.html](http://www.bcdc.ca.gov/plans/sfbay_plan.html).

### ***India Basin Shoreline Park Property***

The 5.6-acre India Basin Shoreline Park property would be redesigned to serve the surrounding community and enhance citywide program offerings. The Blue Greenway/Bay Trail and a Class 1 bikeway would continue through this park. Pedestrian, bicycle, and vehicular access to the shoreline would be enhanced (Figure 2-4a). Potential project elements for this property include improved and upgraded playground and recreational facilities including two basketball courts; restrooms; additional trees; interpretive exhibits explaining the history of the India Basin Scow Schooner Boatyard, including the remains of the various ship hulls located within the confines of the India Basin Shoreline Park; improved lawn areas; a promenade; event areas; a water feature; barbeque pits; drinking fountains; a pier and dock with human-powered boat launch ramp, art installations, fishing areas, and lighting; and an exercise or cross-training course. The existing surface parking, vehicular access, and drop-off and loading zones also may be improved. In addition, 0.64 acre of tidal marsh and wetlands would be created along the shoreline. Multilingual fish advisory signage regarding potential contamination would be installed at appropriate locations on the property, in compliance with Policy 3(a)(8) of the San Francisco Bay Plan.

### ***900 Innes Property***

The 900 Innes property would be developed as a waterfront park providing a connection between India Basin Shoreline Park and the India Basin Open Space. This park also would provide a connection for the Blue Greenway/Bay Trail, the Class 1 bikeway, and pedestrian and bicycle access to the shoreline. Other potential project elements for this property include piers, fishing areas, plazas, event areas, tidal marshes, facilities for concessions, drinking fountains, restrooms, passive recreational areas for picnicking, shade structures, bicycle parking, wayfinding signage, and historical and educational displays. Multilingual fish advisory signage regarding potential contamination would be installed at appropriate locations on the property, in compliance with Policy 3(a)(8) of the San Francisco Bay Plan.

BUILD Development

### ***India Basin Open Space Property***

Under either the proposed project or the variant, the 6.2-acre India Basin Open Space property, which currently consists of benches, upland habitat, tidal salt marsh, mudflats, sand dunes, and native vegetation, would remain in a natural state with some enhancements for public access, recreation, and ecological function (Figures 2-4b and 2-4c). Tidal wetlands currently occupy approximately 2.5 acres of this property. The proposed enhancements could include sand dunes, bird islands, a recreational beach area, a boat launch (directly from the land), a bioengineered breakwater, brackish lagoons, scrub upland plantings, tree stands for wind buffering, and new wetlands and ponds. Multilingual fish advisory signage regarding potential contamination would be installed at appropriate locations on the property, in compliance with Policy 3(a)(8) of the San Francisco Bay Plan.

**COMMENT HZ-2: PROXIMITY OF NEARBY HISTORICALLY CONTAMINATED SITES**

- **O-GA2-13**

“XIII. Hazards and Hazardous Materials: Section 3.16- and Toxic and Potential Radioactive Contamination at the Site:

Due to the close proximity of the proposed project to the radioactive contaminated Hunters Point Naval Shipyard Superfund site, and in light of information provided by community elders and whistleblowers regarding testing, handling and disposal of radioactive wastes at the Shipyard, this project must include a thorough testing, analysis and summary of potentially radioactive and toxic contaminants before any use of this site. While Recreation and Parks has done testing for toxic contaminants and is planning extensive remediation, we are not aware of test results from the BUILD LLC project component. This information is also vitally important to include in the CEQA/EIR process in light of the certainty of rising sea levels and potential storm surges.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-13]*)

**RESPONSE HZ-2**

The comment points out that the proposed project is in close proximity to contaminated Superfund sites with radioactive and toxic contaminants and is concerned that all properties within the project area are tested and remediated. In addition, the comment is concerned about this issue being included in the CEQA/EIR process as it relates to sea-level rise and storm surges.

Information on the history of hazardous materials investigations and reporting at all four properties (RPD and BUILD) within the project site is summarized in Draft EIR Section 3.16, “Hazards and Hazardous Materials,” along with a summary of the chemicals of potential concern detected at each site. In addition, sampling (“test”) results are included in the associated reports included as part of Appendix M, “Hazards Supporting Information,” to the Draft EIR. In particular, for each property, this information can be found at the following locations within the Draft EIR and its appendices:

- India Basin Shoreline Park:
  - Summary of investigations undertaken and chemicals of potential concern (Draft EIR Section 3.16, “Hazards and Hazardous Materials” pp. 3.16-3–3.16-4)
  - Sampling results:
    - » India Basin Shoreline Park Soil Sampling Results (Draft EIR Appendix M, on pp. 3275–3301, and in particular, Table 2 on p. 3278)
    - » Site Mitigation Plan for India Basin Redevelopment Project (Draft EIR Appendix M, on pp. 3322–3449, and in particular, Table 1 on p. 3348; Figure 8 on p. 3357; and Appendix C on pp. 3370–3386)
- 900 Innes Avenue:
  - Summary of investigations undertaken and chemicals of potential concern (Draft EIR Section 3.16, “Hazards and Hazardous Materials,” on pp. 3.16-3–3.16-4)
  - Sampling results:

- » Phase I/II Investigation Targeted Brownfields Assessment (Draft EIR Appendix M, on pp. 636–2564, and in particular Section 6 on pp. 681–687; Tables 6-1–6-4 on pp. 699–712; and Figures 6-1–6-4 on pp. 718–721)
- » Foreshore Sediment Sampling Technical Memorandum (Draft EIR Appendix M, pp. 2582–2741, in particular Section 4 on pp. 2596–2599; Tables 1–7 on pp. 2603–2609; and Figures 3–7 on pp. 2613–2607)
- » Site Mitigation Plan for India Basin Redevelopment Project (Draft EIR Appendix M, pp. 3322–3449, in particular Table 1 on p. 3348; Figure 8 on p. 3357; and Appendix D of that report on pp. 3387–3411)
- » Conceptual Remediation Plan for 900 Innes (Draft EIR Appendix M, pp. 4409–4167, in particular Tables 1 and 2 on pp. 4127–4128; and Figures 7, 8, 9a, and 9b on pp. 4136–4139).
- India Basin Open Space:
  - Summary of investigations undertaken and chemicals of potential concern (Draft EIR Section 3.16, “Hazards and Hazardous Materials,” pp. 3.16-3–3.16-4)
  - Sampling results:
    - » Site Mitigation Plan for India Basin Redevelopment Project (Draft EIR Appendix M, pp. 3322–3449, in particular Table 1 on p. 3348; Figure 8 on p. 3357; and Appendix E on pp. 3412–3425)
- 700 Innes Avenue:
  - Summary of investigations undertaken and chemicals of potential concern (Draft EIR Section 3.16, “Hazards and Hazardous Materials,” on pp. 3.16-3–3.16-4)
  - Sampling results:
    - » Site Mitigation Plan for India Basin 700 Innes (Draft EIR Appendix M, pp. 3450–4098, in particular Section 4 on pp. 3457–3462; and Tables 1–5 on pp. 3482–3489).

Accordingly, environmental testing was completed for the 700 Innes property, as discussed in the above section of the Draft EIR, as well as the other properties located within the project site. With respect to testing for radiological contamination, the Technical Memorandum included in Appendix M of the Draft EIR (pp. 4166–4172 of Appendix M) explains the environmental testing rationale for all properties within the project site, and summarizes the extent of radiological contamination at the adjacent Hunters Point Navy Shipyard site. The Technical Memorandum states there were no indications of materials associated with radiological contamination such as radiological debris or sand blast material noted during the subsurface investigations within the project site. In addition, a review of the regulatory documentation of investigations and remediation activities at the nearby areas of Hunters Point Naval Shipyard have uncovered no evidence that radiological contamination has migrated to or threatens the project site. The Technical Memorandum concludes that radiological testing at the project site is not required. This conclusion is based on available information, regulatory guidance, and opinions of professional engineers who performed the environmental assessments of the properties and determined that radiation issues do not raise a significant potential environmental concern.



In addition, the Site Mitigation Plans (Appendix M, pp. 3322–3449 and 3450–4098) prepared for the project contain contingency plans in the event that unexpected conditions are encountered during construction. The contingency plans include notification of regulatory authorities and response actions, in the unlikely event that radiological materials are discovered.

These contingency plans, along with other mitigation requirements, were included in the Draft EIR and formed the basis for the analysis and conclusions that impacts of the proposed project or variant related to hazardous materials would be less than significant with mitigation incorporated.

The Draft EIR acknowledges potential soil and groundwater contamination due to existing hazardous materials on-site. As stated in Draft EIR Section 3.15, “Hydrology and Water Quality,” on p. 3.15-26, “Hazardous materials remediation actions for all four project site properties (see Mitigation Measure M-HZ-1 in Draft EIR Section 3.16, “Hazards and Hazardous Materials”) would be carried out consistent with site remediation plans approved by the San Francisco Department of Public Health and the San Francisco Bay RWQCB in accordance with requirements of the San Francisco Public Health Code and the California Water Code. Environmental quality criteria would be established for soil, sediment, and groundwater that would remain at the properties and a set of remedial goals would be developed and approved by the San Francisco Bay RWQCB. The site remediation plans would specify procedures governing stormwater runoff controls.”

This comment also infers that sea-level rise and potential storm surges may disturb hazardous soils or spread them throughout the project site. The proposed project and variant’s impacts to sea-level rise and storm surges are described in Impact HY-6 on pp. 3.15-52–3.15-60 in the Draft EIR. The Draft EIR concludes that impacts related to sea-level rise and storm surges would be less than significant because the proposed project and variant would not alter wave/water circulation and flows and would not promote substantial shoreline erosion. Because the proposed project and variant would carry out site remediation plans approved by the aforementioned regulatory agencies, sea-level rise and storm surges would have a low potential to disturb hazardous soils at the project site.

No additional changes to the EIR are required in response to this comment.

### **COMMENT HZ-3: LEAKING UNDERGROUND STORAGE TANKS**

- **Barshak-4**

“Now I want to turn to the CEQA requirement and the impact on the physical environment of an additional 1,240 resident units in an area with leaking underground storage tanks, and the negative impacts on transportation, noise, and air quality.” (*Jackie Barshak, Individual, Barshak, Email, October 26, 2017 [I-Barshak-4]*)

### **RESPONSE HZ-3**

The comment expresses concern about new residents on a site with leaking underground storage tanks and impacts related to transportation, noise, and air quality conditions.

Under both the proposed project and variant, all proposed residential units would be located on the 700 Innes property. The 700 Innes property is not on the State Water Resources Control Board’s list of leaking underground storage tank sites, nor is it listed on any other list of hazardous materials sites compiled pursuant to Government

Code Section 65962.5 (also known as the Cortese List). As noted in Draft EIR Section 3.16, “Hazards and Hazardous Materials,” on p. 3.16-7, the 700 Innes property was incorrectly identified in an earlier Phase I Environmental Site Assessment report indicating the site was listed in a regulatory database as a State hazardous waste site and Voluntary Cleanup Program site. However, during preparation of the Draft EIR, it was found that the earlier Phase I ESA report had incorrectly identified the India Basin Boatyard at 894 Innes Avenue as being part of the 700 Innes property, when in fact it is part of the 900 Innes property. As such, the proposed project or variant would not construct residential units on a leaking underground storage tank site.

As documented in Draft EIR Section 3.16, “Hazards and Hazardous Materials,” all four properties comprising the project site would be subject to mitigation measures requiring preparation and implementation of a site mitigation plan for areas above the mean high-water line (refer to Mitigation Measure M-HZ-2a, on p. 3.16-33 in the Draft EIR Section 3.16, “Hazards and Hazardous Materials”), and a nearshore sediment and materials management plan for areas below the mean high-water line (refer to Mitigation Measure M-HZ-2b, p. 3.16-35). In addition, for the 900 Innes property only, Mitigation Measure M-HZ-2c requires that a remedial action plan be prepared and implemented for that site (p. 3.16-38).

The Site Mitigation Plans (Draft EIR, Appendix M, pp. 3322–3449 and 3450–4098) prepared for the proposed project or variant contain contingency plans in the event that unexpected conditions are encountered during construction. The contingency plans include notification of regulatory authorities and response actions, in the unlikely event that radiological or other contaminated materials are discovered.

Implementation of these mitigation measures would protect future residents and visitors of the project from contamination at the project site, by requiring, among other things:

- development of site-specific cleanup targets that are protective of human health and the environment for each property, based on the proposed future land use(s);
- identification and implementation of measures to achieve the plans’ cleanup levels; and
- identification and implementation of additional controls, including institutional controls where and if necessary, to assure that activities by future users do not expose them to unacceptable health and safety risks if residual contamination remains at the site above site-specific cleanup targets.

Impacts related to transportation are analyzed in Draft EIR Section 3.5, “Transportation”; impacts on air quality are analyzed in Section 3.7, “Air Quality”; and noise impacts are discussed in Section 3.6, “Noise.”

## **R. Alternatives**

The comment and corresponding response related to the topic of Alternatives, evaluated in Draft EIR Chapter 4.0, “Alternatives,” is discussed in Response ME-1 in Subsection T, “Merits of the Project.”

## **S. General Environmental Comments**

The comment and corresponding response in this section relate to the topic of General Environmental Comments. The comments are further grouped by the following issues:

- GC-1: Language Access during CEQA Process

- GC-2: Addressing the Banya Building in the EIR
- GC-3: Public Review Period during CEQA Process
- GC-4: EIR Funding
- GC-5: Adequacy of the EIR
- GC-6: Endorsement of Another Public Comment

#### **COMMENT GC-1: LANGUAGE ACCESS DURING CEQA PROCESS**

- **O-GA1-1**
- **O-GA1-4**
- **O-GA2-1**

“Good afternoon. My name is Sheridan Noelani Enomoto. I am with Greenaction for Health and Environmental Justice. I am a community advocate representing the diverse community of Bayview that will be affected by the building of the India Basin Mixed-Use Project.

I want to recognize actually Nicole Avril, who is with the Department, San Francisco Department of Parks and Recreation, who acknowledges that there is a subsistence fishing community that is fluent in Cantonese and are there at least once a week in India Basin; and also recognizing that there needs to also be a more – a closer look at potential contaminants or hazardous contaminants in India Basin, considering its location adjacent or in proximity to the Bayview-Hunters Point Shipyard.

I also want to recognize in terms of language access, from the scoping period all the way till now it has not acknowledged the -- all of the communities including the limited or non-English-speaking community members that I just mentioned already in any of this process. In fact, the announcements and public hearings of this process have only been written in English.” (*Sheridan Noelani Enomoto, GA, Draft EIR Hearing Transcript, October 19, 2017 [O-GA1-1]*)

---

“Overall, I believe that this process does not include all communities; it is not inclusive to all communities; and, as stated in this Report, it has a negative impact on the environment.” (*Sheridan Noelani Enomoto, GA, Draft EIR Hearing Transcript, Email, October 19, 2017 [O-GA1-4]*)

---

“On behalf of our members and constituents in Bayview Hunters Point, San Francisco, we submit the following comments on the Draft Environmental Impact Report for the proposed India Basin Mixed Use Project. Greenaction For Health and Environmental Justice is a multiracial grassroots organization that works with low-income and working class urban, rural, and indigenous communities to fight environmental racism and build a clean, healthy and just future for all. Greenaction has been involved in environmental health and justice advocacy in Bayview Hunters Point since we were founded in 1997. This low-income community of color continues to be

negatively and disproportionately impacted by pollution, gentrification, health disparities, and other forms of environmental, social, economic injustice.

I. San Francisco Planning Department's Denial of Language Access and Violation of Civil Rights of Limited and Non-English Speaking Residents:

The San Francisco Planning Department's refusal to translate the Scoping Notice for this proposed project and failure to provide even executive summaries of key project documents has denied residents who are limited or non-English speaking from meaningful civic engagement in this environmental review process. As the City and County of San Francisco are recipients of state and federal funding, it must comply with state and federal civil rights laws (California Government Code 11135 and Title VI of the United States Civil Rights Act). These civil rights laws explicitly prohibit recipients of state and/or federal funding from taking actions that have a disparate, discriminatory impact on people of color and non-English speaking people

The first civil rights violation occurred when the Planning Department failed to translate the Scoping Notice and refused to remedy that failure. Thus, the ongoing failure to provide language access, and the subsequent refusal to remedy the problem, constitutes a violation of state and federal civil rights laws. No permit can be issued based on a process that clearly violated the civil rights of residents potentially impacted by the proposed project.

In addition, the Planning Department's translation of the "Notice of Public Hearing and Availability of A Draft Environmental Impact Report" in no ways complies with language access requirements as the limited and non-English speaking residents who may see that Notice in a language they understand would still not be able to read a single word of the DEIR document.

We attach documentation of the civil rights and language access violations, and incorporate those documents into our comments." (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-1]*)

**RESPONSE GC-1**

These comments raise concern regarding community inclusivity during the CEQA process and the failure of the Planning Department to translate the EIR Notice of Preparation. A comment suggests that such failure constitutes a violation of CEQA and State and federal civil rights laws that require restarting the CEQA process for the project. A comment also raises legal issues that are not related to CEQA and, thus, are beyond the scope of this EIR. To the extent a comment expresses concern regarding signage for addressing fishing in relation to potential contamination, this aspect of the comment is addressed in Response HZ-1.

The project sponsors have conducted community outreach in the form of community meetings related to the proposed project. Such meetings are not required by CEQA and were extra above-and-beyond communications and outreach on the part of the project sponsors. In terms of the formal CEQA process, CEQA provides that "[p]ublic participation is an essential part of the CEQA process" and that agencies "should include provisions in [their] CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities." 14 California Code of Regulations Section 15201. Although meaningful public participation is an essential part of the CEQA process, CEQA itself does not require agencies to provide language access services. In

addition, Public Resources Code Section 21083.1 prohibits the interpretation of CEQA in any manner that imposes additional procedural or substantive requirements beyond those explicitly stated in CEQA. (Public Resources Code Section 21083.1, adopted 1993.) Therefore, imposing language access services as a requirement of CEQA is explicitly prohibited by the statute, because such services are not explicitly required under CEQA.

The Planning Department acknowledged its failure to provide the requested translation in its letter dated September 8, 2017 (see the relevant Planning Department letter regarding language access attached to the Greenaction letter in Appendix A)—an unintentional oversight for which the Planning Department expressed deep regret. The Planning Department has since published Chinese, Spanish, and Tagalog translations of the Notice of Availability of the Draft EIR, and the project sponsors have also made available translations of the Executive Summary of the Draft EIR that are available at the following website: <http://sf-planning.org/environmental-impact-reports-negative-declarations>. Accordingly, limited- and non-English-speaking individuals have had meaningful opportunity to participate in the CEQA process and provide comments on the Draft EIR, either in writing or in person during the public scoping meeting on June 19, 2016, and the Draft EIR hearing on October 19, 2017. Such individuals will also have other opportunities to comment before certification of the Final EIR and at additional public hearings on the approvals for the project. Furthermore, individuals can request interpreters be present at any public meetings and hearings if they require them and make such requests to the Planning Department ahead of time. Therefore, the record reflects that limited- and non-English-speaking individuals have been provided opportunities for meaningful involvement in the CEQA process and that no violation of CEQA has thus occurred.

The City's Language Access Ordinance cited in the comment is intended "only to promote the general welfare" and does not give rise to a claim for damages based on an alleged violation of any of its provisions. San Francisco Administrative Code Section 91.19(a) ("[The City and County of San Francisco] is not assuming, nor is it imposing on its officers and employees, an obligation for breach of which it is liable in money damages to any person who claims that such breach proximately caused injury."). In addition, the obligations set forth in the Language Access Ordinance "are directory and the failure of the City to comply shall not provide a basis to invalidate any City action." San Francisco Administrative Code Section 91.19(b). Therefore, the Planning Department's initial failure to provide the requested translation does not constitute a violation of CEQA or any other law that would challenge the sufficiency of the Draft EIR or require the restarting of the CEQA process for the project. No changes to the EIR are required in response to this comment.

**COMMENT GC-2: ADDRESSING THE BANYA BUILDING IN THE EIR**

- **I-Paul-2**
- **I-Paul-3**
- **I-Brodsky-1**
- **I-Brodsky-2**
- **I-Vaidya-1**
- **I-Flores-1**
- **I-Ruggeroli-1**
- **I-Krishnaveni-1**
- **I-Crescibene-3**
- **A-SFPC-1**
- **A-SFPC-2**

“I mean there is going to be shadows, there is going to be traffic impact, there is going to be smell, there is going to be noise. We don’t really know what those things are. And I think it’s incumbent upon this developer that’s proposing this to include in their EIR studies that will help the Banya figure out what it really needs to be successful after this development is built.” (*Jeremy Paul, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Paul-2]*)

---

“This is a fragile institution and it doesn’t -- it’s not a successful business. It employs close to 40 young people that work there, most of them live in the area. We had a very large crowd earlier, but after the second the second round of 200 speakers on cannabis issues, a lot of them had to cut out on us. But I’m going to ask anybody who’s here for -- on behalf of the Archimedes Banya to stand up and show your presence in asking this Commission to see that the Banya is protected in this EIR. Thank you.” (*Jeremy Paul, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Paul-3]*)

---

“Good evening, Commissioners. My name is Mikhail Brodsky. I am the founder of Banya, Archimedes, Archimedes Banya. I also own one of the units there, a residential unit. But, first of all, thank you very much for this proceeding. I am really impressed with your endurance. Even with training in Banya, I don’t know if I could do it the whole day.

Anyway, I bought this lot together with two of my partners in 1999. At that time nobody wanted to buy this lot. It was like dead area around. And all the friends around me, all the people that were saying that I’m crazy trying to build something public, and until this moment it is the only public business where people are coming from other places. But the people are coming not just from San Francisco, they’re coming from everywhere in the world

now, including, you know, of course the whole Bay Area, Sacramento, Monterey, Los Angeles, but it's London, New York, from everywhere.

But it's not my point. You see, during this construction, it took 12 and a half years, we had two public hearings in this building. And, you know, the construction was going very difficult. I needed also an environmental report at this moment and I was the first one who did this environmental report. And, you know, there were many obstacles. Finally it's done. And, eventually, reading the new report, I found that we don't exist and this is kind of strange, this shrugging.

So you know I know about this area more than a majority of the people. I know the soil, I know the density of this landfill, I know what can happen with the water filtering through this landfill, I know what kind of foundations can be built here. I know everything. And, by the way, I am a mathematician, an applied mathematician with a Ph.D. in geophysics." (*Mikhail Brodsky, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Brodsky-1]*)

---

"So I'm kind of surprised how the huge change of the zoning, which is basically undermining the position of the previous Commission which assigned the zoning before, like industrial, can ignore part of the property. There are several parts of the property, including ours, and a couple of other buildings which are totally ignored. They don't exist in this Environmental Impact Report. So it's like it's an empty land, and it's not an empty land. There are people living there, there are people working there, and there are people which are coming from other places to this place." (*Mikhail Brodsky, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Brodsky-2]*)

---

"Sirs, ma'am, my name is Abhishek Vaidya. I am the general manager of Archimedes Banya. I would like to just give you some brief overview.

We have been in operation in this business for five years. We started this business with having less than 20 employees and having less than 500 customers a week, but now, five years fast-forward, we have got over 50 employees and 1200 customers a week. So, you know, if I would not be speaking here today I would be doing a disservice to my employees. All I care about are my employees and my customers.

Please, you guys should not forget us in the Environmental Report. It's not just 50 -- 40 to 50 employees we're talking about, we're talking about 40 to 50 different families over here and mostly all from the Bayview area. So I would just like to be considered in this Environmental Report, yeah. Thank you very much." (*Abhishek Vaidya, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Vaidya-1]*)

---

"Hello. My name is Jesus Flores. I'm also a facilities manager at Archimedes Banya. I'm here to discuss with the issue of the EIR in regards to Archimedes Banya that we are not included into the report. I am here to argue that we write under the addendum and include Archimedes Banya as well.

Archimedes Banya has been in operations for the past five and a half five years and ten months. I am fortunate to have lived and worked there, and have seen the community grow year after year. We have been able to provide our customers with great service and an amazing experience. We offer a unique aspect at Archimedes Banya. We are co-ed and in some parts we are clothing optional.

When customers come to Archimedes Banya they are given a space to heal the body and mind, as we socialize friends as they also socialize with friends. Not only can people relax inside our facilities but can also take time to visit our terrace, bar, or roof deck. Because of the EIR, they are not taking into consideration that we are in existence. For example, in Table 3.1-1, there is a list of existing buildings on the project site and Archimedes Banya is not included.

Throughout the building they will also have various activities that we offer, yoga and qigong. So during construction, they will also take into effect.” (*Jesus Flores, Facilities Manager, Archimedes Banya, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Flores-1]*)

---

“Good evening. Thank you for letting me take a few minutes. My name is Dawn Ruggeroli. And I actually own one of the condo units in the Banya building and I face out into the water.

When the Banya was built, we actually abided by the zoning regulations that were required. And all we ask, all I ask is that our building be included in this Environmental Impact Report and that it be -- that the people that are putting this together follow the same regulations that we were required to follow. And we --it is imperative that we be included in this, because we need to know how we’re impacted and what the impact will be down the road. Thank you very much.” (*Dawn Ruggeroli, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Ruggeroli-1]*)

---

“Hi. My name is Kris Krishnaveni, and I would like to do exactly that. I am a long-time customer and supporter of the Banya and I want to talk a bit about the EIR.

So an environmental impact report, by definition, needs to discuss the impacts on the surrounding area. Well, Archimedes Banya will be surrounded on three sides by this project. It’s been open since 2011. It’s one of the main uses on Innes Avenue and it is not mentioned once in this thousand-page report.

At one point in the report there is a picture of it, but it’s described as a residential building. So I think that this EIR must be revised in order to incorporate the Banya. And the developer needs to work with the Banya respectfully to lessen the impact on the facility, which for me has become a home away from home. And I believe that’s true with many of the other people that are here and many of the other customers. And I hope you will take that into consideration. Thank you very much.” (*Kris Krishnaveni, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Krishnaveni-1]*)



---

“The fact that none of these impacts are mentioned is a glaring omission. This voluminous report that does not once mention the banya needs to be revised and the developers need to work respectfully with banya management to lessen the project’s impacts. As commission Vice President Richards said at the end of the public hearing, “there’s something here that people really care about.” The banya must be protected.” (*Chris Crescibene, Individual, Crescibene, Email, October 29, 2017 [I-Crescibene-3]*)

---

“Agree. Apparently there is something here that people are really -- people really care about and we need to make sure that if there is an issue with the EIR that it gets dealt with. And we will be submitting written comments, in the sake of time.” (*Dennis Richards, Commission Vice-President, San Francisco Planning Commission, Draft EIR Hearing Transcript, October 19, 2017 [A-SFPC2-2]*)

---

“Yeah. I think -- I just think we acknowledge all this and hopefully we haven’t overlooked something, so we will be sure to look very closely at the findings.” (*Rodney Fong, Commissioner, San Francisco Planning Commission, Draft EIR Hearing Transcript, October 19, 2017 [A-SFPC1-1]*)

## **RESPONSE GC-2**

Several of the comments state that the Archimedes Banya building was not included and analyzed in the Draft EIR, including such topics as air quality, noise, shadow, wind, and aesthetics. Some comments express concern from Archimedes Banya staff about the success of the business after the proposed project or variant is built. A comment raises concern about water filtering through the soil and foundations. One comment also states that the Banya was built according to zoning regulations and requests that the same regulations apply to the proposed project and variant.

The Archimedes Banya building is located adjacent to the project site; it is not on the project site, and it is not part of the proposed project. In 2015, BUILD contacted Mikhail Brodsky, the owner of Archimedes Banya, and asked if he would be interested in having the Archimedes Banya property at 748 Innes Avenue included as part of a proposed rezoning effort associated with the proposed project or variant. In response to this inquiry, Mr. Brodsky indicated that he did not want his property to be included in any proposed rezoning effort associated with the proposed project or variant.<sup>66</sup> For this reason, the Archimedes Banya was not included as a component of the proposed project or variant in the Draft EIR.

The Archimedes Banya building was analyzed in the EIR under each relevant topic as a residential and commercial property; however, the name of this institution was not mentioned explicitly in the EIR. Text changes have been made to the Draft EIR in Chapter 2.0, “Project Description,” and Section 3.2, “Aesthetics,” identifying the building by name for clarification.

---

<sup>66</sup> Pash, Courtney, BUILD, e-mail with Mikhail Brodsky of Archimedes Banya, from March 20 to July 6, 2015.

The following paragraphs discuss some of the key environmental topics identified in the Draft EIR for which the proposed project or variant have the potential to impact the Banya. The proposed project or variant's impacts related to the following topics include the Banya building location as an adjacent use in Draft EIR Section 3.2, "Aesthetics"; Section 3.5, "Transportation and Circulation"; Section 3.6, "Noise"; Section 3.7, "Air Quality"; Section 3.9, "Wind"; and Section 3.10, "Shadow," respectively.

The Banya building, which contains a spa business with residences located above, was addressed in the Draft EIR air quality and noise sections as an "off-site sensitive receptor."<sup>67</sup> See Draft EIR Section 3.7, "Air Quality," including Figures 3.7-2, 3.7-3, and 3.7-4, which indicate the Banya building located at 748 Innes Avenue as a proximate sensitive receptor. The discussion in Draft EIR Section 3.7, "Air Quality," on p. 3.7-26 states that "a health risk assessment for construction-related and operational emissions was completed to evaluate potential health risks to sensitive receptors," and Draft EIR p. 3.7-24 states that "the health risk assessment takes into account the cumulative contribution of localized health risks to sensitive receptors from sources included in the Citywide modeling (CRRP-Health Risk Assessment) in addition to the project's sources and other cumulative project sources." Furthermore, Draft EIR Impact AQ-3 assesses the proposed project and variant's impact on off-site sensitive receptors, including the Banya location.

Draft EIR Section 3.6, "Noise," pp. 3.6-15 and 3.6-16, states that the analysis "evaluates noise or vibration caused by operation of the project or variant on on-site users and residents and nearby off-site sensitive receptors" and that it also "evaluates noise or vibration caused by construction of the project or variant on off-site sensitive receptors and on-site users and residents of Phase 1, assuming that such on-site users or residents are residing on the project site during Phase 2 construction." Draft EIR Impact NO-2 assesses the proposed project and variant's impact on off-site sensitive receptors, including the Banya building. Assessment of existing noise levels in the vicinity of the proposed project, along with predictive analyses of noise attributed to the proposed project or variant and its influence on future outdoor ambient noise levels, included in Section 3.6, should help inform the Banya with respect to noise.

The analysis in Draft EIR Section 3.2, "Aesthetics," includes KVP 2 in Figure 3.2-12 on p. 3.2-30, showing the Banya building with the simulated massing of the proposed project and variant; see Response AE-1 for additional details. Draft EIR Section 3.5, "Transportation and Circulation," includes the circulation patterns along Innes Avenue that pass by the Banya building at 748 Innes Avenue and addresses construction and operational conditions. Draft EIR Section 3.6, "Noise," addresses noise from the proposed project or variant, attributed to either construction activities or post-construction operation, including from changes to nearby roadway traffic flows. The Banya building's dimensions, size, and mass are included in Draft EIR Section 3.9, "Wind," and Section 3.10, "Shadow," in analyses that provide the results regarding how wind and shadow from the proposed project or variant would have an impact on the Banya as well as adjacent buildings. Wind impacts are analyzed in the Draft EIR on pp. 3.9-5 through 3.9-22, and the height of the towers is addressed under Mitigation Measure M-WI-1a, "Wind Impact Analysis and Mitigation for Buildings 100 Feet or Greater in Height during Partial Buildout," which will require further analysis as the site is developed in phases. Shadow impacts are analyzed in Draft EIR Figures 3.10-2–3.10-12, which show how the shadow of the towers would affect the surrounding buildings and open spaces for a limited time of the day. The analyses presented in the Draft EIR under these and

---

<sup>67</sup> This is referring to sensitive land uses, such as residences located nearby but not on the project site.

other resource areas conform with the environmental checklist in Appendix G of the CEQA Guidelines and with the significance criteria and analysis approaches and methodologies established by the lead agency (the San Francisco Planning Department) for environmental review under CEQA.

Grading and site preparation activities at the 700 Innes property would involve excavating for construction of a one- to three-level underground garage. An overall cut/fill balance would be maintained through grading activities, which would require the average elevation of the project site to rise by several feet. The appropriate structural materials would be used to carry the load of the buildings and the design will require approval from the San Francisco Department of Building Inspection. All soils will be tested, and contaminated soil will require remediation, which is described in Draft EIR Section 3.16, “Hazards and Hazardous Materials.” Mitigation Measure M-HZ-1 in the Draft EIR requires site remediation plans approved by the San Francisco Department of Public Health and the San Francisco Bay RWQCB in accordance with requirements of the San Francisco Public Health Code and the California Water Code.

It is acknowledged that the Archimedes Banya was built according to zoning regulations. The project site is located in 40-X and Open Space (OS) height and bulk districts. The proposed project and variant designs contain buildings ranging from one to 14 stories (20–160 feet tall). The proposed project or variant would require rezoning to a SUD with specific height, bulk, and use designations appropriate for the proposed development, through amendments to the General Plan, Planning Code text, and the Zoning Map. The design of the individual buildings would require the proposed project or variant to follow design review procedures. The existing designation would limit the proposed project and the variant to a 40-foot height limit, with no bulk restriction. A code compliant alternative was explored in Draft EIR Chapter 4.0, “Alternatives,” which limited the building height throughout the site to 40 feet or approximately four stories. The code compliant alternative would require a larger footprint spread out over more of the project site to achieve a similar overall square footage as the proposed project or variant, resulting in less available space for recreational/open space amenities. Therefore, the code compliant alternative would have greater impacts on transportation and circulation, air quality, utilities and service systems, biological resources, and recreation than the proposed project or variant. A summary of these potential impacts compared to the proposed project and variant is provided in Table 4-2 on p. 4-5 of the Draft EIR.

The use of the Banya’s rooftop deck may be affected by the proposed project or the variant. However, CEQA, as it is applied in San Francisco, does not require an analysis of private views, shadows on private buildings, or economic considerations as expressed by the commenters. The Draft EIR fully and adequately analyzes the physical environmental effects of the project as they relate to the Banya in the following sections of the Draft EIR: Section 3.2, “Aesthetics”; Section 3.5, “Transportation and Circulation”; Section 3.6, “Noise”; Section 3.7, “Air Quality”; Section 3.9, “Wind”; and Section 3.10, “Shadow.” In addition, the significance of the Banya with respect to cultural resources is analyzed in Response CR-1 on pp. 5-33–5-35 of this RTC document.

The comments do not provide evidence of how and in what way the project would result in a significant impact. The comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant. No additional changes to the EIR are required in response to this comment.

### **COMMENT GC-3: PUBLIC REVIEW PERIOD DURING CEQA PROCESS**

- **Brodsky-3**

“So my suggestion is it should be a real serious observation of what should be included in the report. I’m not talking about certain scientific parts which are out of any critics because they don’t have proper citations and they are just basically a manipulation of the data. I can -- I can do it. But you know it’s huge. It’s been, what, a thousand-pages report, which nobody can do -- nobody can write a real complaint to that in one month. Thank you.” (*Mikhail Brodsky, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Brodsky-3]*)

### **RESPONSE GC-3**

The comment expresses concern about the amount of time available to review the Draft EIR. The comment suggests that the Draft EIR is large in size, lacks proper citations, and contains manipulation of data, and as a result, is difficult to write a complaint to in 1 month. The Draft EIR is an informational document, and the scale of the proposed project and variant and their potential effects requires full disclosure and the extent of analysis that was included in the document. In addition, the Draft EIR methodological approach followed San Francisco requirements and those of other agencies with jurisdiction over the proposed project and variant, such as BAAQMD. Data in the EIR were not manipulated, and the analyses provided in the EIR are of appropriate detail, use the appropriate standards and models, and objectively present data to inform the planning and decision-making process. It is not the purpose of an EIR to recommend approval or denial of a project. Furthermore, the Draft EIR was circulated for 47 days (specifically from September 14, 2017, to October 30, 2017) for public review and comment, which complies with the 45 days required per CEQA Section 21091. Finally, the proper procedure was followed during the Draft EIR comment period, as required by State and local CEQA guidelines, and is therefore sufficient.

### **COMMENT GC-4: EIR FUNDING**

- **Jennison-2**

“I’m also questioning on the EIR report the funding of it. Should public land be included by a private industry in the report when the private industry pays for the report? To me, it smacks of not only collaboration but maybe collusion.” (*Ellsworth Jennison, Neighbor, Draft EIR Hearing Transcript, October 19, 2017 [I-Jennison-2]*)

### **RESPONSE GC-4**

This comment concerns the means of funding the EIR preparation and the propriety of using private funds to address the public lands. The San Francisco Planning Department, as the lead agency, requires private applicants to pay permit application fees and to reimburse costs of lead agency time and materials, including that of third party consultants. In addition, it is not inappropriate for a public entity and private entity to partner together on a proposed project, nor is it inappropriate for public improvements to be considered in conjunction with private development.

**COMMENT GC-5: ADEQUACY OF THE EIR**

- **O-GA2-4**

“III. Greenaction agrees with the conclusion reached by the Planning Department’s Draft EIR which “finds that implementation of the proposed project would lead to significant unavoidable project-level or cumulative impacts related to cultural resources, transportation and circulation, noise, air quality, and wind.”

However, the DEIR underestimated a number of other key significant aspects of the proposed project that would also have significant unavoidable and negative impacts on the environment, community and public health.

Therefore, due to the significant unavoidable negative impacts, the Planning Department must deny permits for the proposed project.

IV. Planning Department Must Not Use a Statement of Overriding Consideration to Approve this Project Despite Significant Unavoidable Negative Impacts:

It would be completely improper, and a violation of civil rights of people of color residents of Bayview Hunters Point, if the Planning Department decides to circumvent EIR findings of significant unavoidable impacts by using a Statement of Overriding Consideration exemption under CEQA.

Use of a Statement of Overriding Consideration to approve an upscale mega-development project that would contribute to pollution and gentrification of the already polluted, heavily impacted people of color community would be a major violation of civil rights and would be challenged successfully.” (*Bradley Angel, et. al., Executive Director, Greenaction, Email, October 30, 2017 [O-GA2-4]*)

**RESPONSE GC-5**

The comment suggests that there are other impacts besides those identified in the Draft EIR that would result in significant and unavoidable project-level or cumulative impacts but does not provide evidence of how or in what way the project would result in other significant and unavoidable impacts. The environmental issues raised by this comment in its entirety and others from this organization (Comments O-GA1 and O-GA2) are addressed in the following responses: GC-1, AQ-1, PH-1, GC-1CR-3, PH-1, PH-4, TR-2, NO-1, AQ-1, GC-1, GG-1, UT-1, PS-1, HZ-1, HZ-2, HY-1, and GC-5. The Draft EIR’s inclusion of some significant and unavoidable impact conclusions does not require the Planning Department to disapprove the project. Rather, a Statement of Overriding Considerations would need to be prepared by the Planning Department for consideration by the City decision-makers as part of their deliberations on the merits of the project and whether to approve, modify, or disapprove the project. In cases where a project’s significant effects cannot be mitigated or avoided, an agency, after adopting proper findings, may nevertheless approve the project if it first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the “benefits of the project outweigh the significant effects on the environment.” (Public Resources Code, Section 21081(b); see also CEQA Guidelines, Sections 15093 and 15043(b).) The determination regarding whether to adopt a statement of overriding considerations will be made by the decision-makers.

## **COMMENT GC-6: ENDORSEMENT OF ANOTHER PUBLIC COMMENT**

- **O-BHPCA-1**

“Please consider this email the Bayview Hunters Point Community Advocates full-throated endorsement of Green Action’s comments attached below. It is egregious that a project of this scope of environmental destruction and permanent community displacement should be allowed to go forward in a “progressive” city. We can all do better than this.” (*J. Michelle Pierce, Executive Director, BHPCA, Email, October 30, 2017 [O-BHPCA-1]*)

## **RESPONSE GC-6**

See Responses GC-1, GC-5, HZ-2, PH-1–PH-3, CR-2, TR-2, NO-1, AQ-1, GG-1, UT-1, PS-1, and HY-1 for discussions pertaining to the comments brought forth within the separate Greenaction letter that this comment endorses.

## **T. Merits of the Project**

A number of comments were received that state support for, opposition to, or concern about the proposed project, variant, and/or alternatives based on their respective merits. The comments and corresponding responses in this section relate to the topic of merits of the proposed project and variant. The comments are further grouped by the following issues:

- ME-1: Support of the Proposed Project and Variant Design and Community Input
- ME-2: Preference for the EIR No Project Alternative
- ME-3: Preference for the EIR Full Preservation Alternative
- ME-4: Preference for a 100 Percent Affordable Housing Alternative
- ME-5: Funding Sources
- ME-6: Preference for a 100 Percent Open Space/Park Use Alternative
- ME-7: Preference for Additional Open Space/Park Uses on Adjacent Land

## **COMMENT ME-1: SUPPORT FOR THE PROPOSED PROJECT AND VARIANT DESIGN AND COMMUNITY INPUT**

- **O-TPL-1**
- **A-ABAG-9**

“Good evening, Commissioners. I’m Philip Vitale with the Trust for Public Land. We’re a national organization that believes that everybody in America deserves a high quality park and green space within a ten-minute walk. I’m here to speak in support of the India Basin Shoreline Park and 900 Innes Project

We have worked with San Francisco for more than 40 years and are proud to partner, do partnering with Rec and Park, San Francisco Parks Alliance and BUILD, Inc., to renovate the existing India Basin Shoreline Park and transform the former boatyards of Vine and 900 Innes into an amazing waterfront park.

Shortly after the City acquired the 900 Innes site, our organization joined efforts to engage the community around the transformation of the India Basin Waterfront. This started with by forming a mayoral appointed task force comprised of community groups such as Hunters Point Families, Parks Line Pro 124, the Sierra Club, the Audubon Society, Young Community Developers, and many more.

Working closely with the task force, we developed a waterfront study which identified appropriate programs and amenities in the seven basin sites. We followed that with an ideas competition for the India Basin Shoreline Park and 900 Innes, which a jury, which was comprised of community members and technical professionals, selected the firm of GGN, and we continued engaging the community through focus groups, community meetings, attending events and fairs and inform – that informed the concept design. And then we feel that the design represents the varied interest of the community and we’re excited by the passionate engagement of the community in the design and look forward to further engaging the community in the next phases as this design progresses.”  
*(Philip Vitale, Trust for Public Land (TPL), Draft EIR Hearing Transcript, October 19, 2017 [O-TPL-1])*

“Thank you for the opportunity to comment on the above-referenced document. The Water Trail is enthusiastic about the proposed non-motorized small boat facilities proposed for India Basin and appreciates the project team’s efforts to solicit and incorporate feedback and design suggestions.” *(Ben Botkin, San Francisco Bay/Water Trail Planner, Association of Bay Area Governments, Email, October 27, 2017 [A-ABAG-9])*

## **RESPONSE ME-1**

These comments state support for the concept design of India Basin Shoreline Park, proposed non-motorized boat facilities, the future open space at the 900 Innes property, and the opportunity for public input into the design. This comment will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant.

## **COMMENT ME-2: PREFERENCE FOR THE EIR NO PROJECT ALTERNATIVE**

- **I-Rekovoff-1**

“Good evening, Commissioners. Good evening, Committee. My name is Vladimir Rekovoff (phonetic). I am a resident of Santa Cruz, and just a few words about this place.

It is absolutely, from my opinion, a unique place. Because I have some -- lots of experience with different places, even in Santa Cruz we have a beautiful place, but this one, absolutely a unique place. Like I say, very friendly. Staff, very kind people, and amazing food actually in buffet. It’s like really homemade food. But it’s all details.

But like what I say, what I want to say in general, it’s a -- there will be big changes if something will happen around Banya and it’s not good, I don’t think so, for patrons like me, thousands of patrons, because it’s a growing business. It’s a very successful business, a very beautiful building, how it’s designed, everything. So it’s -- I think we will be very sad if something would happen, and so I’m completely opposed, like with my hundreds of friends, and I not recommended it to do anything -- I mean to develop this area. Okay. Thank you very much.”  
*(Vladimir Rekovoff, Individual, Draft EIR Hearing Transcript, October 19, 2017 [I-Rekovoff-1])*

## **RESPONSE ME-2**

This comment expresses concern about the Banya spa and changes that would occur to the setting around the building, and in turn generally recommends no changes at the project site (i.e., the No Project Alternative). The No Project Alternative is included and analyzed in Draft EIR Section 4.3, “No Project Alternative,” pp. 4-4-4-10, and is available as an alternative for decision-makers to consider as part of the project approval process. This comment will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant.

## **COMMENT ME-3: PREFERENCE FOR THE EIR FULL PRESERVATION ALTERNATIVE**

- **O-BHS-1**
- **O-BHS-2**
- **O-BHS-3**
- **O-BHS-5**
- **O-FIC-1**

“After reviewing the Draft Environmental Impact Report for the proposed India Basin Mixed-Use Project, with particular attention paid to the Cultural Resources Supporting Information under Appendix C, The Bayview Historical Society recommends a Full Preservation Alternative with respect to the Shipwright’s Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site, and 838-840 Innes Avenue related structures and pathways.” (*Dan Dodt, President, Bayview Historical Society, Email, October 27, 2017 [O-BHS-1]*)

---

“The Bayview Historical Society commissioned the initial India Basin Historic Survey in 2008, and our members have been active in supporting and advocating for the retention and restoration of cultural resources in the community. We worked with the India Basin Neighborhood Association, in 2006, in their tireless efforts to designate the Shipwright’s Cottage at 900 Innes Avenue as San Francisco Landmark #250. In 2013, we initiated a process with the San Francisco Planning Department/ Historic Preservation Commission to cite the prior owners of 900 Innes Avenue due to violation of the U.S. Department of the Interior ‘Demolition by Neglect’ ordinance. We assembled an archival team to document condition of 900 Innes Avenue, and corresponded with the owners, demanding repairs. Our challenge to SFDBI regarding abatement of repairs resulted in a repair of roofing system at 900 Innes, thus saving the building from further deterioration and loss at the time.

We believe that continuing to preserve this landmarked building is only a part of the story, and that additional preservation of adjacent resources is key to retaining the overall historical significance of the area.” (*Dan Dodt, President, Bayview Historical Society, Email, October 27, 2017 [O-BHS-2]*)

---



---

“As is noted in the descriptor for the Full Preservation Alternative, that action would be ‘similar to the proposed project and variant, but would include the rehabilitation to Secretary of Interior (SOI) Standards of all three buildings (the Shipwright’s Cottage, the Boatyard Office Building, and the Tool Shed and Water Tank building) that are significant features of the India Basin Scow Schooner Boatyard and contribute to the boatyard’s CRHR eligibility. The Full Preservation Alternative would also propose that plantings and new park furniture would be designed to retain the industrial character of the cultural landscape.’ We suggest that these comprehensive preservation steps are entirely consistent with the opinions rendered by the senior consultants to the Draft EIR.” *(Dan Dodt, President, Bayview Historical Society, Email, October 27, 2017 [O-BHS-3])*

---

“Thank you for considering our comments. We respectfully suggest that a Full Preservation Alternative for the Shipwright’s Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site, and 838-840 Innes Avenue related structures and pathways be thoroughly considered during your review of the Draft EIR for the India Basin Mixed Use Project.” *(Dan Dodt, President, Bayview Historical Society, Email, October 27, 2017 [O-BHS-5])*

---

“On behalf of the 94124 community, Dan Dodt wrote an eloquent and accurate argument for a more thoughtful approach to development in our city’s most significant historic sites--artifacts from our maritime legacy. The two boatyard properties and the Shipwright’s Cottage are intrinsic to the story of the city’s history. These and a handful of other properties in 94124 require our understanding, foresight and intervention to prevent their replacement by a network of interpretative signs. Why settle for verisimilitude when we can have authenticity?” *(Robin Chiang, Volunteer Executive Director, FIC, Letter, October 30, 2017 [O-FIC-1])*

### **RESPONSE ME-3**

These comments generally recommend or state a preference for the Full Preservation Alternative. The Full Preservation Alternative is included and analyzed in Draft EIR Section 4.6, “Full Preservation Alternatives,” pp. 4-56–4-62, and is available as an alternative for decision-makers to consider as part of the project approval process.

More specifically, a comment states a preference for preserving the Shipwright’s Cottage building and adjacent resources, which in turn indicates an overall preference for the Full Preservation Alternative.

The Shipwright’s Cottage and portions of the India Basin Scow Schooner Boatyard are being retained under all project alternatives. Under the Full Preservation Alternative, the Shipwright’s Cottage would be preserved and rehabilitated in accordance with the Secretary of Interior’s Standards. See Draft EIR Section 3.4, “Cultural Resources,” under Impact CR-1 on pp. 3.4-33–3.4-52, for further discussion of how the Shipwright’s Cottage and other historical resources on the project site would be affected, including associated mitigation measures.

Neither the Allemand Brothers Boatyard site nor the 838–840 Innes Avenue location were found to meet the eligibility criteria for the California Register of Historical Resources, and therefore, are not considered historic resources under CEQA. For this reason, the Allemand Brothers Boatyard site and the 838–840 Innes Avenue

location were not addressed in the Full Preservation Alternative. These comments will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant.

**COMMENT ME-4: PREFERENCE FOR A 100 PERCENT AFFORDABLE HOUSING ALTERNATIVE**

- **I-Barshak-2**

“To the Developer: Develop the entire site as 100% affordable housing.” (Jackie Barshak, Individual, Barshak, Email, October 26, 2017 [I-Barshak-2])

**RESPONSE ME-4**

The comment states a preference for development of the project site with 100 percent affordable housing units. This potential project concept (or alternative) is discussed on p. 4-75 of the Draft EIR in Chapter 4.0, “Alternatives.” The Draft EIR concluded that this alternative would not be economically feasible. Specifically, to construct 100 percent affordable housing, all funds otherwise available for public benefits would be directed back into filling the gap for construction of these homes, and thus, no funds would be available to improve or construct new park or open space uses, provide transportation improvements, or subsidize new art installations. This alternative also would not meet some of the project objectives such as including high-quality housing with sufficient density to contribute to 18-hour activity on the project site while offering a mix of unit types and sizes. This alternative also would not provide sufficient mixed-use development capacity with a range of flexible uses that can respond to market demands and attract the private capital necessary to build out the proposed project in a timely fashion and financially support an array of public benefits, including public open space, a permanent maintenance and operations tax district, community job training and small business development opportunities, public transportation improvements, and affordable housing. This comment will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant.

**COMMENT ME-5: FUNDING SOURCES**

- **I-Barshak-3**

“Find a way to construct while finding other funding sources to build parks and open space, provide transportation improvements and subsidies to new art installations.” (Jackie Barshak, Individual, Barshak, Email, October 26, 2017 [I-Barshak-3])

**RESPONSE ME-5**

The comment addresses funding for affordable housing and public improvements. Specifically, this comment requests that the project find other funding sources for the construction of parks, open spaces, transportation improvements, and art subsidies. As financing and funding of projects is outside the purview of CEQA, the comment does not specifically address the accuracy or adequacy of the Draft EIR. The Draft EIR includes a discussion of socioeconomic impacts (including those related to displacement and affordable housing) in Section 5.4, “Socioeconomic Considerations under CEQA,” and the comment’s suggestions regarding funding and financing for affordable housing and public improvements at the site may be considered separately by decision-

makers as part of project entitlement hearings at the Planning Commission and other discretionary actions and approvals as described in Draft EIR Section 2.4, “Discretionary Actions and Approvals of the Draft EIR.”

**COMMENT ME-6: PREFERENCE FOR A 100 PERCENT OPEN SPACE/PARK USE ALTERNATIVE**

• **I-Jennison-4**

“But my main point is really if it was – that area was to be topographically contoured with trees, it would add value to the rest of the City and especially the Bayview area. Then you have the projects up on the hill that are on Franciscan Rock, maybe make a trade-off with the developers, maybe get eminent domain from the federal government that owns that property, just like they gave us the Naval Yard and the Treasure Island, make a trade off for property that was worth 36 million --

MR. IONIN: Thank you, sir. Your time is up.

MR. JENNISON: that was bought in auction for 13 million. But, you know, sometimes you –

MR. IONIN: Sir, --

MR. JENNISON: Yeah, I know.

MR. IONIN: your time is up.

MR. JENNISON: Yeah, I know my time is up, but

MR. IONIN: You can submit your written comments

MR. JENNISON: Yeah, but I would just --

MR. IONIN: to the Planning Department.

MR. JENNISON: like to say that sometimes you can't go to sleep unless you say something. Thank you for the opportunity.” (*Ellsworth Jennison, Neighbor, Draft EIR Hearing Transcript, October 19, 2017 [I-Jennison-4]*)

**RESPONSE ME-6**

The comment states a preference for development of the project site with 100 percent open space. This potential project idea (or alternative) was evaluated on pp. 4-75–4-76 of the Draft EIR in Chapter 4.0, “Alternatives.” The Draft EIR concluded that this alternative would not be economically feasible. Specifically, funds are not available to develop the entire site as open space/park, as the cost of waterfront land in San Francisco is at a premium, the cost to clean up hazardous materials is very high, and without financial resources from a private developer a 100 percent open-space/park use alternative is not practical. This alternative would also not meet some of the project objectives such as including housing on the project site while offering a mix of unit types and sizes and providing sufficient mixed-use development capacity with a range of flexible uses that can respond to market demands and attract the private capital necessary to build out the project site and financially support an array of public benefits,

including but not limited to public open space. This comment will be transmitted to, and may be considered by, the decision-makers as part of their deliberations on the proposed project and variant.

**COMMENT ME-7: PREFERENCE FOR ADDITIONAL OPEN SPACE/PARK USES ON ADJACENT LAND**

- **I-Jennison-1**

“Yes, sir. My name is Ellsworth Jennison. That’s E-l-l-s-w-o-r-t-h, the last name is Jennison, J-e n-n-i-s-o-n. I don’t think -- I am not sure if anyone knows the India Basin area more than me. I’ve been living on the edge of the water or on the water for the last 37 years. I’m here to speak for the -- basically the wildlife in the area.

And I think in the spirit of the AAA proposition that was passed last year -- or legislation, I guess, as far as recouping and reconfiguring tidal lands, it should be considered.

The -- the main thing is we have an opportunity as a city for creating one of the best parks in the world, not only on the Innes property but also on the PG&E property. I think that we should really look into the vision of what could happen.” (*Ellsworth Jennison, Neighbor, Draft EIR Hearing Transcript, October 19, 2017 [I-Jennison-1]*)

**RESPONSE ME-7**

The comment states a preference for development of open space and recreational/park elements on the adjacent PG&E property (located off site and not currently proposed as part of the proposed project or variant). The project sponsors do not own the adjacent PG&E property, nor do they have control of the types of land uses that may or may not be developed there. City decision-makers may consider this issue as part of their deliberations on the merits of the project and whether to approve, modify, or disapprove the project.

**5 DRAFT EIR REVISIONS**

This section presents text changes for the *India Basin Mixed-Use District Project Draft Environmental Impact Report* initiated by Planning Department staff. Some of these are text changes identified in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project”; others are from the responses in Chapter 4, “Comments and Responses”; and others are staff-initiated text changes that add minor information or clarification related to the proposed project and correct minor inconsistencies and errors. Staff-initiated text changes are highlighted with an asterisk (\*) in the margin, to distinguish them from text changes in response to comments. The text revisions clarify, expand, or update the information presented in the Draft EIR. The revised text does not provide new information that would result in any new significant impact not already identified in the EIR or any substantial increase in the severity of an impact identified in the EIR, and recirculation of the EIR is not required. In addition to the changes called out below, minor changes may be made to the consolidated Final EIR to correct typographical errors and small inconsistencies. Revisions and clarifications to the project description and relevant environmental impact analyses and mitigation measures are presented in this section (new text is double-underlined and deletions are shown in ~~strike through~~). These revisions and clarifications would not result in any new significant impacts that were not already identified in the Draft EIR, nor would these changes increase the severity of any the project’s impacts identified in the Draft EIR. The first set of changes related to the RPD development are also included in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” but have been repeated here to indicate all the changes to the Draft EIR in one location.

As described in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” one of the project sponsors (BUILD) has initiated revisions to the proposed project that would increase the number of residential units, reduce the commercial square footage and replace the school with residential space within the same building footprints on the 700 Innes property. Because the revised proposed project would replace the proposed project and would include all of the revisions introduced and analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” the changed proposed project is referred to interchangeably throughout this chapter as either the “revised proposed project,” or simply, the “proposed project.”

**Summary**

- \* The second-to-last paragraph of Mitigation Measure M-CR-1a on Draft EIR p. S-9 has been revised. The staff-initiated text changes are as follows:

<p><b>Impact CR-1:</b> Construction under the proposed project or variant would cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5, including those resources listed in</p>	<p>Significant</p>	<p><b>Mitigation Measure M-CR-1a: Prepare and Implement Historic Preservation Plans and Ensure that Rehabilitation Plans Meet Performance Criteria</b></p> <p>The Planning Department shall not issue building permits associated with historical resources until Preservation staff concur that the designs conform to the SOI Standards for Rehabilitation, <u>except for the Tool Shed interpretive structure and the Boatyard Office Building, if included in the final design.</u> Should alternative materials be proposed for replacement of historic materials, they shall be in keeping with the size, scale, color, texture, and general appearance, and shall be</p>	<p>Significant and Unavoidable with Mitigation</p>
--	--------------------	---	--

Article 10 or Article 11 of the San Francisco Planning Code.

approved by Planning Department Preservation staff. The performance criteria shall ensure retention of the character-defining features of each historical resource, as identified in the HPP, which in turn shall be developed in accordance with the HRE developed for the project (San Francisco, 2017b).

- \* The conclusion for Impact C-CR-1 regarding CEQA impacts after mitigation measures, on Draft EIR p. S-17, has been revised to be consistent with the impact conclusion shown on p. 3.4-59. The staff-initiated text changes are as follows:

**Impact-C-CR-1:** The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would substantially contribute to cumulative impacts related to cultural resources.

Significant See **Mitigation Measures M-CR-1a, M-CR-1b, M-CR-2a and M-CR-3a.**

Significant and Unavoidable  
Less than Significant with Mitigation

- \* The CEQA impacts before mitigation measures conclusion for Impact TR-7 on Draft EIR p. S-22 has been revised to be consistent with the impact statement appearing on p. 3.5-71 of the Draft EIR. The text of the improvement measure has been revised to be consistent with the information contained in the Design Guidelines and Standards document. The staff-initiated text changes are as follows:

**Impact TR-7:** Except for the passenger loading activities associated with the proposed school, the proposed project or variant, would result in a loading demand during the peak hour of loading activities that would be accommodated within proposed on-site loading facilities or within convenient on-street loading zones, and would not create potentially hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit.

Less than Significant

**Improvement Measure I-TR-7: Implement an Active Loading Management Plan**

If the project sponsor for the 700 Innes property proposes to provide fewer loading spaces than required under the Special Use District (SUD) for the proposed project or variant, the project sponsor should, at their discretion, develop an Active Loading Management Plan for review and approval by the Planning Department to address operational loading activities. The Active Loading Management Plan would facilitate efficient use of loading spaces and may incorporate the following ongoing actions to address potential ongoing loading issues:

- Direct residential and commercial tenants to schedule all move-in and move-out activities and deliveries of large items (e.g., furniture) with the management for their respective building(s).
- Direct commercial and retail tenants to schedule deliveries, to the extent feasible.
- Reduce illegal stopping of delivery vehicles by directing building lobby attendants and retail tenants to notify any illegally stopped delivery personnel (i.e., in the red zones) that delivery vehicles should be parked in the on-street commercial loading spaces.
- Design the loading areas to include sufficient storage space for

Less than Significant with Mitigation

---

deliveries to be consolidated for coordinated deliveries internal to project facilities (i.e., retail and residential).

- Design the loading areas to allow for unassisted delivery systems (i.e., a range of delivery systems that eliminate the need for human intervention at the receiving end), particularly for use when the receiver site (e.g., retail space) is not in operation. Examples include the receiver site providing a key or electronic fob to loading vehicle operators, which enables the loading vehicle operator to deposit the goods inside the business, or in a secured area that is separated from the business but accessible from a public ROW.

~~A draft Active Loading Management Plan should be included as part of the Design Guidelines and Standards document for the project site.~~ A final Active Loading Management Plan and all subsequent revisions, if implemented, would be reviewed and approved by the Planning Department. The Final Active Loading Management Plan would be approved prior to receipt of the first Certificate of Occupancy for the first parking/loading garage.

The ~~Draft and~~ Final Active Loading Management Plans (if implemented) would be evaluated by a qualified transportation professional, retained by the project sponsors and approved by the Planning Department, after the combined occupancy of the commercial and residential uses reaches 50 percent and once a year going forward until the Planning Department determines that the evaluation is no longer necessary or may be done at less frequent intervals. The content of the evaluation report would be determined by Planning Department staff, in consultation with SFMTA, and generally may include an assessment of on-site and on-street loading conditions, including actual loading demand, observations of loading operations, and an assessment of how the project meets this improvement measure.

The evaluation report would be reviewed by Planning Department staff, who would make the final determination whether there are conflicts associated with loading activities. In the event of such conflicts, the project sponsors may propose modifications to the above Final Active Loading Management Plan requirements to reduce conflicts and improve performance under the Plan (such as hour and day restrictions or restrictions on the number of loading vehicle operations permitted during certain hours). The project sponsors would submit any proposed modifications to the Plan for review and approval by the Planning Department.

---

- \* The revised proposed project would not include a school. Therefore, Impact TR-8 is only applicable to the variant and should be Impact TR-8V. In Table S-2, “Summary of Impacts,” text edits have been made for Impact TR-8 on Draft EIR page S-23 to reflect that Mitigation Measure M-TR-8 only applies to the variant, not the revised proposed project, and to be consistent with the discussion and mitigation measure shown on p. 3.5-75. The staff-initiated text changes are as follows:

<p><b>Impact TR-8V:</b> Under either the proposed project or variant, passenger loading demand associated with the school during the peak hour of loading activities would not be accommodated within proposed on-site passenger loading facilities or within convenient on-street loading zones, and would create potentially hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit.</p>	<p><u>Less Than Significant</u></p>	<p><b>Mitigation Measure M-TR-8V: Implement Passenger Loading Strategies for the School (Variant)</b></p> <p>Once school enrollment reaches 22 students, the school proposed for the 700 Innes property <u>under the variant</u> shall provide and enforce a pick-up/drop-off plan subject to review and approval by SFMTA to minimize disruptions to traffic, bicycle, and pedestrian circulation associated with school pick-up/drop-off activities and ensure safety for all modes. This plan shall include elements such as the size and location of loading zone(s), parking monitors, staggered drop-offs, a number system for cars, one-way circulation, encouragement of carpools/ride-sharing, and a safety education program. The safety education program shall be targeted at school students, guardians, and staff, as well as residents and businesses near the school site.</p> <p>Informational materials targeted to guardians and nearby residents and employees shall focus on the importance of vehicular safety, locations of school crossings, and school zone speed limits and hours.</p>	<p>Less than Significant with Mitigation</p>
---	-------------------------------------	--	--

- \* The text of Mitigation Measure M-AQ-1f on Draft EIR pp. S-34–S-37 has been revised to clarify the timing of the mitigation measure. The staff-initiated text changes are as follows:

**Mitigation Measure M-AQ-1f: Prepare and Implement Transportation Demand Management**

To reduce operational mobile source emissions, the project sponsors shall prepare and implement a transportation demand management (TDM) plan. The TDM plan shall have a goal of reducing estimated aggregate daily one-way vehicle trips associated with the 700 Innes and India Basin Open Space properties by at least 15 percent compared to the aggregate daily one-way vehicle trips identified in the project-related Transportation Impact Study dated July 2017 and the Supplement to the Transportation Impact Study, dated April 27, 2018 (together, the “Final Transportation Impact Study) and included in EIR Appendix F D as calculated before the imposition of TDM measures.

~~The project sponsors shall prepare and implement a transportation demand management (TDM) plan. The TDM plan shall have a goal of reducing estimated aggregate daily one-way vehicle trips by at least 15 percent compared to the aggregate daily one-way vehicle trips identified in the project related Transportation Impact Study dated July~~



2017 and included in EIR Appendix F.

To ensure that this reduction goal could be reasonably achieved, the ~~project sponsors shall have a~~ TDM plan ~~will have a monitoring~~ with a goal of reducing ~~by 15 percent~~ the daily one-way vehicle trips ~~to and from the project site~~ by 15 percent for ~~each~~ all buildings that ~~has~~ have received a certificate of occupancy and that ~~is~~ are at least 75 percent occupied, relative to the aggregate daily one-way vehicle trips anticipated for ~~that~~ those buildings based on the trip generation rates contained within the Final Transportation Impact Study as calculated before the imposition of TDM measures, expected development on that parcel.

~~To ensure that this reduction goal could be reasonably achieved, the TDM plan will have a monitoring goal of reducing by 15 percent the daily one-way vehicle trips for each building that has received a certificate of occupancy and that is at least 75 percent occupied, relative to the one-way vehicle trips anticipated for that building based on expected development on that parcel. The calculations shall use the trip generation rates contained in the project's Transportation Impact Study. The calculations shall use the b~~Baseline scenario trip generation rates contained in the Final Transportation Impact Study until the point at which SFMTA provides 1,000 passenger capacity per weekday p.m. peak hour along Innes Avenue, at which point the calculations shall use the Cumulative scenario trip rates in the Final Transportation Impact Study. There shall be a transportation management association that would be responsible for the administration, monitoring, and adjustment of the TDM plan. The project sponsors shall be responsible for monitoring implementation of the TDM plan and proposing adjustments to the plan if its goal is not being achieved, in accordance with the following provisions. The TDM plan may include but is not limited to the types of measures summarized below by way of example. Actual TDM measures selected should include those from the City's adopted TDM Program Standards, which describe the scope and applicability of candidate measures in detail and include:

- **Active Transportation:** Streetscape improvements to encourage walking, secure bicycle parking, shower and locker facilities for cyclists, subsidized bikeshare memberships for project occupants, bicycle repair and maintenance services, and other bicycle-related services.
- **Car-Share:** Car-share parking spaces and subsidized memberships for project occupants.
- **Delivery:** Amenities and services to support delivery of goods to project occupants.
- **Family-Oriented Measures:** On-site childcare and other amenities

to support the use of sustainable transportation modes by families.

- **High-Occupancy Vehicles:** Carpooling/vanpooling incentives and shuttle bus service.
- **Information and Communications:** Multimodal wayfinding signage, transportation information displays, and tailored transportation marketing services.
- **Land Use:** On-site affordable housing and healthy food retail services in underserved areas.
- **Parking:** Unbundled parking, short-term daily parking, parking cash-out offers, and reduced off-street parking supply.

The TDM plan shall describe each measure, including the degree of implementation (e.g., how long will it be in place, how many tenants or visitors it will benefit, on which locations within the site it will be placed) and the population that each measure is intended to serve (e.g., residential tenants, retail visitors, employees of tenants, visitors). The TDM plan shall commit to monitoring of vehicle trips to and from the project site to determine the plan's effectiveness, as described in "TDM Plan Monitoring and Reporting" below. The TDM plan shall have been approved by the Planning Department before site permit application for the first building, and the plan shall be implemented for each new building upon the issuance of the certificate of occupancy for that building.

The TDM plan shall be submitted to the Planning Department for approval to ensure that components of the plan intended to meet the reduction target are shown in the plan and/or ready to be implemented upon the issuance of each certificate of occupancy.

The TDM plan shall remain a component of the proposed project and variant to be implemented for the duration of the proposed project or variant.

**TDM Plan Monitoring and Reporting:** The TDM Coordinator shall collect data, prepare monitoring reports, and submit them to the Planning Department. To ensure that the goal of reducing by at least 15 percent the aggregate daily one-way vehicle trips is reasonably achievable, the project sponsor shall monitor daily one-way vehicle trips for all buildings that have received a certificate of occupancy and that are at least 75 percent occupied, and shall compare these vehicle trips to the aggregate daily one-way vehicle trips anticipated for ~~the~~ those buildings based on the trip generation rates contained within the project's Final Transportation Impact Study.

**Timing.** The TDM Coordinator shall collect monitoring data and shall begin submitting monitoring reports to the Planning Department 18 months after issuance of the first certificate of occupancy for buildings

that are at least 75 percent occupied on the 700 Innes property that include off-street parking or the establishment of surface parking lots or garages. Thereafter, annual monitoring reports shall be submitted (referred to as “reporting periods”) until five consecutive reporting periods show that the fully built project has met the reduction goal. From that point on, monitoring data shall be submitted to the Planning Department once every three years. Each trip count and survey (see below for description) shall be completed within 30 days after the end of the applicable reporting period. Each monitoring report shall be completed within 90 days after the applicable reporting period. The timing of monitoring reports shall be modified so that a new monitoring report is submitted 12 months after adjustments are made to the TDM plan to meet the reduction goal, as may be required under the “TDM Plan Adjustments” heading, below. In addition, the Planning Department may modify the timing of monitoring reports as needed to consolidate this requirement with other monitoring and/or reporting requirements for the proposed project or variant, such as annual reporting under the proposed project’s or variant’s development agreement.

**Term.** The project sponsors shall monitor, submit monitoring reports, and make plan adjustments until the earlier of: (i) the expiration of the development agreement, or (ii) the date the Planning Department determines that the reduction goal has been met for up to eight consecutive reporting periods.

~~Notwithstanding the foregoing or any other provision of this mitigation measure, all obligations for monitoring, reporting, and adjusting the TDM plan shall terminate if the project sponsor has paid and/or made a commitment to pay the offset fee for any shortfall in the TDM plan’s meeting the reduction goal as provided below.~~

**Components:** The monitoring and reporting, including trip counts, surveys and travel demand information, shall include the following components or comparable alternative methodology and components, as approved, accepted or provided by Planning Department staff:

Trip Count and Intercept Survey: Provide a site-wide trip count and intercept survey of persons and vehicles arriving and leaving the project site for no less than two days during the reporting period between 6:00 a.m. and 8:00 p.m. One day shall be a Tuesday, Wednesday, or Thursday on which San Francisco public schools are in session during one week without federally recognized holidays, and another day shall be a Tuesday, Wednesday, or Thursday on which San Francisco public schools are in session during another week without federally recognized holidays. The trip count and intercept survey shall be prepared by a qualified transportation or survey consultant, and the Planning Department shall approve the methodology prior to the Project

Sponsors conducting the components of the trip count and intercept survey. The Planning Department anticipates it will have a standard trip count and intercept survey methodology developed and available to project sponsors at the time of data collection.

Travel Demand Information: The above trip count and survey information shall be able to provide the travel demand analysis characteristics (work and non-work trip counts, origins and destinations of trips to/from the project site, and modal split information), as outlined in the Planning Department's Transportation Impact Analysis Guidelines for Environmental Review, October 2002, or subsequent updates in effect at the time of the survey.

Documentation of Plan Implementation: The TDM coordinator shall work in conjunction with the Planning Department to develop a survey (online or paper) that can be reasonably completed by the TDM coordinator and/or Transportation Management Association (TMA) staff members to document implementation of TDM program elements and other basic information during the reporting period. The project sponsors shall include this survey in the monitoring report submitted to the Planning Department.

Assistance and Confidentiality: The Planning Department will assist the TDM coordinator with questions regarding the components of the monitoring report and will assist the TDM coordinator in determining ways to protect the identity of individual survey responders.

**TDM Plan Adjustments.** The project sponsors shall adjust the TDM plan based on the monitoring results if three consecutive reporting periods demonstrate that measures in the TDM plan are not achieving the reduction goal. The TDM plan adjustments shall be made in consultation with Planning Department staff and may require refinements to existing measures (e.g., change to subsidies, increased bicycle parking), inclusion of new measures (e.g., a new technology), or removal of existing measures (e.g., measures shown to be ineffective or induce vehicle trips). If the Planning Department determines that the reduction goal has been met for eight consecutive reporting periods, the TDM Plan in place at the time of the eighth consecutive successful reporting period shall be considered the final TDM Plan.

If the monitoring results from three consecutive reporting periods demonstrate that measures in the TDM plan are not achieving the reduction goal, the TDM plan adjustments shall occur within 270 days after the last consecutive reporting period. The TDM plan adjustments shall occur until the monitoring results of three consecutive reporting periods demonstrate that the reduction goal is achieved.

If after implementing TDM plan adjustments, the project sponsors have not met the reduction goal for up to eight consecutive reporting periods,

as determined by the Planning Department, then the project sponsors may, at any time thereafter, elect to use another means to address the shortfall in meeting the TDM plan reduction target. Specifically, in addition to paying the emission offset fees set forth in Mitigation Measure M-AQ-1d, the project sponsors may pay an additional offset fee in accordance with Mitigation Measure M-AQ-1d. This additional offset fee would be the amount required to address both the shortfall in reduction during the previously monitored years and the anticipated shortfall in the remaining expected years of project operations. The anticipated shortfall shall be based on the shortfall that occurred in the most recently monitored year. Calculations of emissions to be offset shall be based on the total amount of emissions anticipated to be reduced by achieving the 15 percent TDM goal, adjusted for the actual percentage of aggregate daily one-way vehicle trip reduction achieved in the most recently monitored year. After paying this additional offset fee, the project sponsors shall continue to monitor, report, and adjust their TDM Plan in accordance with this Mitigation Measure M-AQ-1f, to ensure that the shortfall from the reduction goal does not increase significantly over time for the duration of the term defined herein. At the end of that term, the project sponsors' monitoring, reporting, and adjusting obligations of Mitigation Measure M-AQ-1f shall terminate, but the project sponsors shall continue to implement the final TDM Plan for the life of the project. The final TDM Plan shall be either a) the TDM Plan that met the reduction goal for eight consecutive reporting periods; or b) if the project sponsors have paid an additional offset fee, the TDM plan that achieved the highest reduction goal for any reporting period.

The summary of the project's significant and unavoidable impacts on Draft EIR p. S-67 has been revised to be consistent with the Transportation and Circulation section of the Draft EIR (pp. 3.5-1–3.5-100). The staff-initiated text changes are as follows:

**Transportation and Circulation Impacts:**

- ~~Project level transportation impacts from the project's loading demand during the peak hour of loading activities and resulting hazardous traffic conditions or significant delays affecting transit, bicycles, or pedestrians.~~

\* The impact conclusion for cultural resources in Table S-3, "Summary of Impact Conclusions of the EIR Alternatives Compared to the Proposed Project and Variant," on p. S-69 of the Draft EIR has been revised to be consistent with Section 3.4, "Cultural Resources" (pp. 3.4-1–3.4-64). The staff-initiated text changes are as follows:

Cultural Resources	<del>SUM</del> LSM	<del>SUM</del> LSM	NI (less than PP & PV)	SUM (same as PP & PV)	SUM (same as PP & PV)	LSM (less than PP & PV)	LSM (less than PP & PV)
--------------------	--------------------	--------------------	---------------------------	--------------------------	--------------------------	----------------------------	----------------------------

**Chapter 2.0, “Project Description”**

As discussed in RTC Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” since publication of the Draft EIR one of the project sponsors has initiated revisions to the proposed project as described in Draft EIR Chapter 2.0, “Project Description.” The corresponding revisions to the text, tables, and figures in Draft EIR Chapter 2.0 are shown below.

- \* The first paragraph of Draft EIR Section 2.1.3, “Surrounding Land and Water Uses,” on p. 2-4 has been revised as follows:

Surrounding land uses include PG&E’s former power plant to the north; public housing (Hunters View, Hunters Point East/West, Northridge, and Westbrook) to the west; the Bay to the north; and the future Northside Park for the Candlestick Point–Hunters Point Shipyard Development Plan project to the east. Northside Park will be a 12.8-acre public park, adjacent and across the Earl Street ROW (currently an unaccepted and undeveloped street) from the 700 Innes property along the Bay waterfront. The future park is planned to include an open-air marketplace, sports and playground uses, and natural areas for passive use and access to the Bay. Immediately adjacent to and on the same side of Innes Avenue as the project site as well as across Innes Avenue to the south of the project site are one- to three-story residential buildings. One of these residential buildings also includes the Archimedes Banya, which is a spa and communal bathing facility located at 748 Innes Avenue. Figure 2-1 shows the surrounding land uses relative to the project site.

- \* Table 2-3, “Summary of Proposed Project and Variant Components,” on p. 2-15 of Draft EIR Chapter 2.0, “Project Description,” has been revised based on changes to the proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

(Revised) **Table 2-3: Summary of Proposed Project and Variant Components**

<b>Proposed Feature</b>	<b>Proposed Project</b>	<b>Variant</b>
Residential Space (# of units)	<del>1,240,100</del> <u>1,506,324</u> gsf ( <del>1,240</del> <u>1,575</u> units)	417,300 gsf (500 units)
Commercial Space—retail, office, R&D	<del>275,330</del> <u>209,106</u> gsf	1,000,000 gsf
Institutional/Educational Space	<del>50,000</del> <u>0</u> gsf	50,000 gsf
Parking Space (# of spaces)	679,900 gsf (1,800 spaces)	717,365 gsf (1,932 spaces)
Publicly Accessible Recreation/Open Space (# of acres)	1,067,220 sq. ft. (24.5 acres)	1,067,220 sq. ft. (24.5 acres)
<b>Total Space</b>	<del><b>3,312,550</b></del> <b><u>3,462,550</u></b> gsf	<b>3,251,885 gsf</b>
Building Heights (# of floors)	160 feet (14 floors)	160 feet (14 floors)
Building Footprint (# of acres)	422,532 gsf (9.7 acres)	422,532 gsf (9.7 acres)
# of Bike Spaces	<del>1,240</del> <u>1,575</u> spaces	500 spaces

Notes: gsf = gross square feet; R&D = research and development; sq. ft. = square feet  
Source: Compiled by AECOM in 2017~~8~~

- \* The description of commercial uses on the 700 Innes property under the proposed project and variant, on p. 2-22 of Draft EIR Chapter 2.0, “Project Description,” has been revised based on changes to the proposed project to create the revised proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Proposed Project**

Under the proposed project, up to ~~275,330~~209,106 gsf of commercial, retail, R&D, or flex space would be developed at select ground-floor locations (Figure 2-4b). The commercial and retail uses would be distributed throughout the residential development and would be phased in as the residential units are built to achieve a mixed-use development pattern. The primary retail uses would front New Hudson Avenue. Uses could include food markets, retail sales, dry cleaners, coffee shops, artist studios, restaurants and bars, and commercial venues that would relate to shoreline activities (e.g., sports, leisure).

**Variant**

Under the variant, up to 1 million gsf of retail, commercial, R&D, or flex space would be developed (Figure 2-4c). Along Innes Avenue, commercial/retail buildings would be constructed between New Griffith Street and Earl Street, resulting in ~~724,670~~790,894 gsf more commercial uses than under the proposed project. In addition, as under the proposed project, retail, commercial, or flex space would be developed at select ground-floor locations.

- \* The description of residential uses on the 700 Innes property under the proposed project and variant, on p. 2-23 of Draft EIR Chapter 2.0, “Project Description,” has been revised based on changes to the revised proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

***700 Innes Property***

**Proposed Project**

Under the proposed project, up to ~~1,240,100~~1,575 residential units (~~1,240,100~~1,506,324 gsf) would be developed in buildings ranging from one to 14 stories (20–160 feet tall) (Figures 2-4b, 2-5b, 2-6a, and 2-7a). The final number of units would depend on the unit mix, which would consist roughly of ~~198,252~~ studio units (16 percent), ~~236,299~~ one-bedroom units (19 percent), ~~682,867~~ two-bedroom units (55 percent), and ~~124,157~~ three-bedroom units (10 percent). The proposed project is subject to the San Francisco Inclusionary Affordable Housing Program (Planning Code Section 415) and would comply with the program by either providing on-site or off-site units or paying an in-lieu fee, as required by the Planning Code, or as otherwise specified in the development agreement.

**Variant**

Up to 500 residential units (417,300 gsf) would be developed under the variant (Figures 2-4c, 2-5b, 2-6b, and 2-7b). Although the variant would have ~~740,075~~ fewer units than the proposed project, the layout of residential development would generally be similar. The residential buildings would be located primarily north of New Hudson Avenue, with a small number of units west of New Griffith Street. In addition,

residential uses would be constructed above the commercial uses. Buildings would range from one to 14 stories (20 to 160 feet tall) (Figures 2-6b and 2-7b). The final number of units would depend on the unit mix and would consist roughly of 50 studio units (10 percent), 125 one-bedroom units (25 percent), 275 two-bedroom units (55 percent), and 50 three-bedroom units (10 percent). The variant is subject to the Inclusionary Affordable Housing Program and would comply with the program by either providing on-site or off-site units or paying an in-lieu fee, as required by the Planning Code, or as otherwise specified in the development agreement.

- \* The school on the 700 Innes property under the proposed project described in the Draft EIR would not be constructed under the revised proposed project. Therefore, p. 2-24 of Draft EIR Chapter 2.0, “Project Description,” has been revised as follows:

### ***700 Innes Property***

~~Under either the proposed project or the variant, an approximately 50,000-gsf structure for a school would be constructed on the 700 Innes property (Figures 2-4b and 2-4c). The school is anticipated to serve up to 450 students in kindergarten through 8th grade. See Section 2.3.11, “Phasing and Construction,” for information about school construction. In addition, a~~ At least one on-site childcare facility would be provided on this property; the specific location and size of this childcare facility have not yet been determined.

The second bullet on Draft EIR p. 2-28 under the heading “RPD Development” has been revised, as follows:

- The *Sage Slopes* would include a playground, adult fitness programming, walking trails, two basketball courts, skate trails nestled within plantings of native California sage scrub, and a viewing deck outlining the hull of the *Bay City*.<sup>68</sup> Walking trails through the *Sage Slopes* and other shoreline areas would be limited to locations that would avoid and protect sensitive natural habitats.

The following text changes have been made to Draft EIR Chapter 2.0, “Project Description,” on p. 2-29:

The 5.6-acre India Basin Shoreline Park property would be redesigned to serve the surrounding community and enhance citywide program offerings. The Blue Greenway/Bay Trail and a Class 1 bikeway would continue through this park. The Blue Greenway/Bay Trail would be between 12 feet wide and 24 feet wide throughout the properties and would connect seamlessly to the existing Blue Greenway/Bay Trail. Within the portions of the Blue Greenway/Bay Trail that would be a minimum of 12 feet wide, the trail would not include shoulders. Pedestrian, bicycle, and vehicular access to the shoreline would be enhanced (Figure 2-4a). Potential project elements for this property include improved and upgraded playground and recreational facilities including two basketball courts; restrooms; additional trees; interpretive exhibits explaining the history of the India Basin Scow Schooner Boatyard, including the remains of the various ship hulls located within the confines of the India Basin Shoreline Park; improved lawn areas; a promenade; event areas; a water feature; barbeque pits; drinking fountains; a pier and dock with human-powered boat launch ramp, art installations, fishing areas, and lighting; and an exercise or cross-training course. The existing surface parking, vehicular access, and drop-off and loading zones also may be

---

<sup>68</sup> As a component of the interpretive exhibit would be installed on the viewing deck outlining the hull of the *Bay City*, park visitors could read about the vessel while simultaneously viewing its remains from the deck.



improved. In addition, 0.64 acre of tidal marsh and wetlands would be created along the shoreline. Multilingual advisory signage regarding potentially unsafe levels of contaminants in fish would be installed at appropriate locations on the property, in compliance with Policy 3(a)(8) of the San Francisco Bay Plan.

### ***900 Innes Property***

The 900 Innes property would be developed as a waterfront park providing a connection between India Basin Shoreline Park and the India Basin Open Space. This park also would provide a connection for the 12–24-foot wide Blue Greenway/Bay Trail, the Class 1 bikeway, and pedestrian and bicycle access to the shoreline. Other potential project elements for this property include piers, fishing areas, plazas, event areas, tidal marshes, facilities for concessions, drinking fountains, restrooms, passive recreational areas for picnicking, shade structures, bicycle parking, wayfinding signage, and historical and educational displays. Multilingual advisory signage regarding potentially unsafe levels of contaminants in fish would be installed at appropriate locations on the property, in compliance with Policy 3(a)(8) of the San Francisco Bay Plan.

BUILD Development

### ***India Basin Open Space Property***

Under either the proposed project or the variant, the 6.2-acre India Basin Open Space property, which currently consists of benches, upland habitat, tidal salt marsh, mudflats, sand dunes, and native vegetation, would remain in a natural state with some enhancements for public access, recreation, and ecological function (Figures 2-4b and 2-4c). Tidal wetlands currently occupy approximately 2.5 acres of this property. The proposed enhancements could include sand dunes, bird islands, a recreational beach area, a boat launch (directly from the land), a bioengineered breakwater, brackish lagoons, scrub upland plantings, tree stands for wind buffering, and new wetlands and ponds. Multilingual advisory signage regarding potentially unsafe levels of contamination in fish would be installed at appropriate locations on the property, in compliance with Policy 3(a)(8) of the San Francisco Bay Plan.

The fifth full paragraph of Draft EIR Section 2.3.3, “Architecture and Design,” on p. 2-37 has been revised as follows:

Proposed structures would be constructed to the standards required by the San Francisco Green Building Ordinance, which establishes Leadership in Energy and Environmental Design (LEED) certification levels or GreenPoint Rated system points for various types of buildings. Specifically, the proposed RPD development would be constructed to a LEED Gold rating or equivalent, and the BUILD development would be constructed to a LEED Silver rating or equivalent. On the India Basin Shoreline Park property, wildlife-proof trash and recycling containers would be installed. In addition, all buildings and lighting would follow the provisions of the San Francisco Better Streets Plan for lighting and San Francisco’s Standards for Bird Safe Buildings. Because of the length of the buildout period for the RPD properties, the design details of individual buildings and structures would be further refined as specific building permits are sought.

The second full paragraph of Draft EIR Section 2.3.3, “Architecture and Design,” on p. 2-38 has been revised with the following sentence:

The Marineway lawn component of the proposal would extend north from the park entry and terminate at the water, at a beach for people to sit or kayakers to launch boats during higher tides, while a fixed pier would extend out into India Basin to meet a new floating platform. A viewing deck with seat steps extending to the edge of the enhanced Marsh Edge would be constructed over the buried remains of the *Bay City*, one of the historic ship hulls located within the Park. The deck would function as an interpretive exhibit conveying the history of the India Basin Scow Schooner Boatyard, including the remains of the *Bay City*. An outfitter building, located on land adjacent to the pier, would provide storage for kayaks, canoes, and life jackets; a kayak and canoe rental service; and office space to operate RPD programming. Members of the public would launch their own boats as well as the rental kayaks and canoes, and covered areas for shelter would provide space for birders, outdoor classes, and picnicking. Pursuant to San Francisco Park Code Sections 3.09 and 4.01, the following activities are prohibited from the India Basin Shoreline Park: fireworks, light shows, balloon releases, candles on the water, and drones.

The following text has been added to Draft EIR Chapter 2.0, “Project Description,” on p. 2-40 under “Landscaping” to improve the proposed revised project. These revisions do not change any of the analysis or conclusions of the Draft EIR.

All RPD parks include park rules signage indicating prohibited activities, including allowing dogs to be off-leash.

The fifth full paragraph of Draft EIR Section 2.3.4, “Landscaping,” on p. 2-40 has been revised as follows:

The Marsh Edge area would be restored by replacing the hard riprap edge along India Basin Shoreline Park with a soft, vegetated buffer that would provide habitat for birds and animals and improve the park’s ability to adapt to sea-level rise and storm surges. The India Basin Shoreline Park would also include interpretive signage or exhibits educating park visitors about the area’s history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The last paragraph of Draft EIR Section 2.3.4, “Landscaping,” on pp. 2-40–2-41 has been revised as follows:

On the 900 Innes property, the proposed Scow Schooner Boatyard area would feature shoreline plantings, a water feature, seating and picnic tables, and restored artifacts from the boatyard, such as the marine way rails and potentially the Fool sShed interpretive structure. The existing concrete surface at the boatyard would remain in place wherever possible and resurfaced to create an ADA-compliant surface, and selected areas of crumbling concrete could be replaced with tidal marsh wetlands. Historic pathways would be retained and highlighted through the use of scale and materials and the historic yard areas would be retained as an open area with minimal plantings. The 900 Innes property would also include

interpretive signage or exhibits educating park visitors about the area's history and ecology. Similar to all RPD parks, the new signage for India Basin Shoreline Park would also include park rules and etiquette indicating activities encouraged and prohibited, including prohibiting dogs from being off-leash and people from walking off-trail into sensitive habitat areas. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The second full paragraph of Draft EIR Section 2.3.4, "Landscaping," on p. 2-41 has been revised as follows:

Existing wetlands and tidal marshes on the India Basin Open Space property would be enhanced and new tidal marsh would be created in the property's northwest and northeast sections. Approximately 0.31 acres of new seasonal wetlands would be created. Native and adaptive species would be planted. There would also be an elevated pedestrian boardwalk, pier, and gravel beach. The India Basin Open Space property would include interpretive signage or exhibits educating park visitors about the area's history and ecology. Similar to all RPD parks, the India Basin Open Space property would also include park rules and etiquette signage indicating activities encouraged and prohibited, including on-trail use to protect sensitive habitat areas and keeping dogs on-leash. Signage related to fishing would be multilingual and would educate the public regarding potential toxins in Bay fish and potential effects on area wildlife. Identified sensitive habitats would be roped off as well to prevent pedestrian access to such areas.

The third full paragraph of Draft EIR Section 2.3.5, "Shoreline and In-Water Uses," on p. 2-41 has been revised as follows:

Finally, a gravel beach would be created at the end of the grass Marineway for people to sit or kayakers to launch boats during higher tides. Between November and March, no RPD programming involving on-water activities would be scheduled. In addition, RPD has located the India Basin Shoreline Park parking lot adjacent to the pier to prevent the transport of hand-powered boats through sensitive shoreline habitat.

The fourth full paragraph of the Draft EIR, on p. 2-46 under "Pedestrian and Bicycle Access and Circulation," has been revised as follows:

Both the proposed project and the variant would include a network of new pedestrian pathways and Class 1 and 3 bicycle lanes to enable a minimum of an approximately 12-foot-wide continuous Blue Greenway/Bay Trail and multiple points of access between the India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes properties. Continuous access to the future Northside Park immediately to the east, part of the Candlestick Point–Hunters Point Shipyard project, would also be provided. Figures 2-11b, 2-12b, and 2-13b show the proposed pedestrian and bicycle circulation and access.

- \* The description of bicycle parking on p. 2-57 in Draft EIR Section 2.3.7, "Parking and Loading," has been revised based on changes to the proposed project:

In addition, the proposed project would provide a minimum of ~~1,240~~1,575 Class 1 and Class 2 bicycle parking spaces on the 700 Innes property, in accordance with Planning Code requirements. Class 1 spaces

would be distributed throughout the residential building developments on the ground-floor and/or garage levels and in park areas. Class 2 bicycle parking spaces would be provided on sidewalks throughout the 700 Innes property's open space areas for recreational users, visitors, and guests, in accordance with the India Basin SUD.<sup>69</sup> These improvements would be included as part of the transportation demand management (TDM) measures that would be incorporated as part of either the proposed project or the variant.

\* The supply of bicycle parking would increase under the revised proposed project. As a result, the Draft EIR on p. 2-58 in Section 2.3.8, "Transportation Demand Management," has been revised as follows:

- *Bicycle Parking:* Provide secure bicycle parking via bicycle lockers or racks located on the project site in an indoor space. The proposed project would provide ~~1,343~~1,477 Class 1 bicycle parking spaces (such as bike lockers or secure bike rooms) and ~~163~~98 Class 2 bicycle parking spaces (traditional, publicly accessible bicycle racks). The variant would provide 745 Class 1 bicycle parking spaces and 164 Class 2 bicycle parking spaces.

On Draft EIR p. 2-59, the following text has been provided to further clarity on multimodal signage as it relates to the Bay Trail:

Multimodal Wayfinding Signage: Provide directional signage for locating transportation services (shuttle stop), regional bicycle and pedestrian facilities (Bay Trail), and amenities (bicycle parking).

The list of discretionary actions and approvals on Draft EIR p. 2-74 is revised as follows:

- **San Francisco Department of Public Health (DPH)**
  - Approve site remediation plans under Health Code Article 22A.
  - If an Alternate Water Source System/Non-Potable Water System is implemented, approve an application for it under Health Code Article 12C

### ***Section 3.1, "Land Use and Land Use Planning"***

\* Table 3.1-2, "Summary of Proposed Project and Variant Components," on p. 3.1-14 of the Draft EIR, has been revised based on changes to the proposed project, which are analyzed in Chapter 2, "Project Description Revisions and Clarifications, and the Revised Proposed Project," of this RTC document. The changes to the Draft EIR are as follows:

---

<sup>69</sup> Class 1 spaces would protect the entire bicycle and would be placed in secure, weather-protected facilities, intended for use as long-term, overnight, and workday bicycle storage by dwelling unit residents, nonresidential occupants, and employees. Class 2 spaces would be located in a publicly accessible, highly visible location, intended for transient or short-term use by visitors, guests, and building patrons (i.e., standard bicycle racks that would allow users to tether their bicycles).

(Revised) **Table 3.1-2: Summary of Proposed Project and Variant Components**

<b>Project Feature</b>	<b>Proposed Project</b>	<b>Variant</b>
Number of Dwelling Units	<del>1,240,100</del> <u>1,506,324</u> gsf ( <del>1,240</del> <u>1,575</u> units)	500
Commercial Space	<del>279,145</del> <u>209,106</u> gsf	<del>1,003,815</del> <u>1,000,000</u> gsf
Institutional/Educational Space	<del>53,499</del> <u>0</u> gsf	<del>53,499</del> <u>50,000</u> gsf
Number of Parking Spaces	1,800	1,932
Publicly Accessible Recreation/Open Space	1,067,220 sq. ft. (24.5 acres)	1,067,220 sq. ft. (24.5 acres)

Notes: gsf = gross square feet; sq. ft. = square feet  
Source: AECOM, 2016~~8~~

### ***Section 3.2, “Aesthetics”***

The first paragraph of the Draft EIR on p. 3.2-17 has been revised, as shown below, to clarify that the Banya building was included within the Draft EIR analysis. These revisions do not change any of the analyses or conclusions of the Draft EIR.

#### **Key Viewpoint 9**

KVP 9 (Figure 3.2-10) faces north toward the project site from the southern side of Innes Avenue at its intersection with Earl Street. This viewpoint offers typical views that a motorist would encounter while traveling west or east along Innes Avenue. Existing northwesterly views toward the project site are dominated by two vehicle lanes in each direction, one- to three-story buildings, overhead power lines, street trees, and parked cars. The buildings along Innes Avenue are varied in height and scale, ranging from approximately 12 to 50 feet tall. The Banya building at 748 Innes Avenue, which includes residential uses as well as a spa and communal bathing facility, is a four-story building with a cream and red-colored facade that is visible in the middle-ground from this vantage point. Overhead utility wires combined with the inconsistent building heights along Innes Avenue combine to create a weak sense of horizontal trending lines. Although the viewpoint faces Heron’s Head Park and the Bay, intervening development obstructs views of the water and the project site.

- \* Text on p. 3.1-46 of the Draft EIR has been revised based on changes to the proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

#### ***Operation***

The proposed project would consist of approximately ~~275,330~~ 209,106 gsf of commercial/institutional uses and ~~1,240~~ 1,575 dwelling units. The variant would consist of up to approximately 1,000,000 gsf of commercial/institutional uses and 500 dwelling units, fewer dwelling units but a greater amount of commercial and institutional uses than under the proposed project. Despite the differences in potential land uses, the tallest buildings under the proposed project and variant would be similar at a maximum of 14 stories, or 160 feet. Likewise, the street orientation and design would be the same. The 14-story buildings would be in the same location under both the proposed project and the variant. Therefore, the

following impacts on the existing visual character and quality of the site and its surroundings would be similar for both project scenarios.

**Section 3.3, “Population and Housing”**

- \* Table 3.3-4, “Population, Housing, and Employment Projections for the Proposed Project and Variant in 2022,” on p. 3.3-9 of the Draft EIR, has been revised based on changes to the proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

(Revised) **Table 3.3-4: Population, Housing, and Employment Projections for the Proposed Project and Variant in 2022<sup>1</sup>**

	<b>Population</b>	<b>Housing</b>	<b>Employment</b>
Proposed Project	<del>3,401</del> <u>4,316</u>	<del>1,240</del> <u>1,575</u>	<del>929</del> <u>706</u>
Variant	1,371	500	3,535

Notes:

<sup>1</sup> The buildout year for the proposed project and variant is anticipated to be 2022.  
Source: Bean, pers. comm., 2016, compiled by AECOM in 2018.

- \* Text on p. 3.3-10 of the Draft EIR has been revised based on changes to the proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**700 Innes Property**

At full project buildout, which is expected to occur by 2022, the proposed project would add ~~1,240~~ 1,575 housing units, approximately ~~3,401~~ 4,316 residents, and ~~929~~ 706 permanent employees to the 700 Innes property (Bean, pers. comm., 2016). By contrast, the variant would add 500 housing units, 1,371 residents, and 3,535 permanent employees to this property (Bean, pers. comm., 2016). Adding ~~3,401~~ 4,316 residents under the proposed project would increase the study area’s population by ~~41~~ 61 percent, or approximately ~~0.30~~ 0.5 percent of the City’s 2030 population, while adding 1,371 residents under the variant would increase the study area’s population by 47 percent, or approximately 0.1 percent of San Francisco’s 2030 population.<sup>70</sup> Adding ~~929~~ 706 or 3,535 permanent employees under the proposed project or variant, respectively, would increase employment in the study area by ~~23~~ 18 percent or 44 percent, or approximately 0.1 or 0.4 percent of the total number of jobs in San Francisco in 2030.<sup>71</sup>

As mentioned above in Section 3.3.2, “Regulatory Framework,” the Regional Housing Needs Assessment, which projects the Bay Area’s housing needs based on regional trends, determined that San Francisco’s fair share of regional housing needs between 2015 and 2022 is 28,870 new residential units. The addition of ~~1,240~~ 1,575 housing units under the proposed project would represent ~~4.35~~ 5.5 percent of San Francisco’s housing needs by 2022. Likewise, the addition of 500 housing units under the variant

<sup>70</sup> The 2014 Housing Element projects San Francisco’s population to be 981,800 in 2030.

<sup>71</sup> The 2014 Housing Element projects the total number of jobs to be 707,670 in 2030.

would represent 1.7 percent of San Francisco’s housing needs by 2022. Although the proposed project or variant would cause the study area’s population to increase, growth in this area has long been the subject of many planning activities, including the *Bayview Hunters Point Area Plan*. In summary, the direct population and housing growth provided as part of the project aligns with the City’s redevelopment effort to create a vibrant high-density, mixed-use neighborhood along the Bayview shoreline (San Francisco, 2010).

### *Proposed Project*

The proposed project would have the capacity to supply housing for all ~~929~~706 new employees. Because the amount of housing provided by the proposed project would exceed the housing demanded by new employees, the direct employment growth at the 700 Innes property under the proposed project could be accommodated by housing provided under the proposed project.

- \* Text on p. 3.3-12 under the topic of Impact PH-2 of the Draft EIR has been revised based on changes to the proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

#### **700 Innes Property**

The two residential parcels on the 700 Innes property, located at 702 Earl Street and 838-840 Innes Avenue, are currently occupied. These two parcels have a combined population of six people. The residential property at 838-840 Innes Avenue would be demolished, but the structure at 702 Earl Street, which currently houses four people, would be relocated on the 700 Innes property. Thus, two people would be displaced by project construction. Overall, the proposed project would develop ~~1,240~~1,575 residential units, while the variant would develop 500 units. Neither the proposed project nor the variant would displace an amount of existing housing units or persons that would necessitate construction of new units beyond the units proposed as part of the development.

- \* The cumulative analysis on p. 3.3-13 of the Draft EIR has been revised based on changes to the proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

Development of cumulative projects in the City, as identified in Table 3-1 in Section 3.0.3, “Format of the Environmental Analysis,” would result in an increase in population, housing, and employment. Specifically, the projects listed in Table 3-1 that would increase population, housing and employment under the cumulative scenario are the Candlestick Point and Hunters Point Shipyard (Phases I and II), Hunters View, Executive Park, Brisbane Baylands, and Visitacion Valley/Schlage Lock (Redevelopment Zones 1 and 2) projects. In combination with the proposed project or variant, the cumulative projects would result in ~~16,313~~16,648 new housing units or 15,573 new housing units, which in turn would result in ~~39,151~~40,066 new persons or 37,375 new persons in the City. However, these cumulative projects would generate cumulative population, housing, and employment conditions that are within the 2030 projections formulated by the Planning Department and would help the City meet its share of the Regional Housing Needs Assessment. For example, the supply of housing under the cumulative projects scenario would be between 54 and ~~57~~58 percent of the Regional Housing Needs Assessment target for the

City by 2022. Furthermore, population growth under the cumulative scenario would represent approximately 12 percent of the projected population growth of the City by 2030. Therefore, the cumulative population, housing, and employment impact would be *less than significant*. No mitigation measures are necessary.

### ***Section 3.4, “Cultural Resources”***

- \* The second paragraph under the heading, “Indirect Effects of Project Site Development,” on p. 3.4-45 of the Draft EIR, has been revised based on changes to the proposed project, which are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

The project’s conceptual land use plan for the 700 Innes property is characterized by buildings ranging in height from one to 14 stories (~~20–150~~160 feet tall), with buildings concentrated along Innes Avenue, Arelious Walker Drive, Hudson Avenue, New Hudson Avenue, and Earl Street. Up to ~~245,300~~209,106 gsf of commercial, retail, or flex space would be developed at ground-floor locations under the proposed project; the variant would develop up to 1 million gsf. The variant would have ~~740~~1,075 fewer units than the proposed project, but the layout of residential development would generally be similar. Residential buildings would be located primarily north of New Hudson Avenue, with a small number of units west of New Griffith Street. Residential uses would be constructed above the commercial uses. Buildings would range from one to 14 stories (~~20–150~~160 feet tall). A 50,000-gsf school would be constructed on the 700 Innes property under ~~either the proposed project or the variant~~. These buildings would be identifiable as new construction.

- \* The second-to-last paragraph of Mitigation Measure M-CR-1a on Draft EIR p. 3.4-49 has been revised. The changes to the Draft EIR are as follows:

The Planning Department shall not issue building permits associated with historical resources until Preservation staff concur that the designs conform to the SOI Standards for Rehabilitation, except for the Tool Shed interpretive structure and the Boatyard Office Building, if included in the final design. Should alternative materials be proposed for replacement of historic materials, they shall be in keeping with the size, scale, color, texture, and general appearance, and shall be approved by Planning Department Preservation staff. The performance criteria shall ensure retention of the character-defining features of each historical resource, as identified in the HPP, which in turn shall be developed in accordance with the HRE developed for the project (San Francisco, 2017b).

### ***Section 3.5, “Transportation and Circulation”***

In response to the updated information provided by ABAG in its comment regarding the length of the Bay Trail, the referenced paragraph in Draft EIR Section 3.5, “Transportation and Circulation,” on p. 3.5-23 has been changed as follows:

“The Association of Bay Area Governments (ABAG) administers the *San Francisco Bay Trail Plan* (Bay Trail Plan). The Bay Trail is a multipurpose recreational trail that, when complete, would encircle San Francisco and San Pablo bays with a continuous ~~400~~500-mile network of bicycling and hiking trails;



~~338,354~~ miles of the alignment have been completed to date. ABAG's 2005 Gap Analysis Study (ABAG, 2005) attempted to identify the remaining gaps in the Bay Trail system; classify the gaps by phase, county, and benefit ranking; develop cost estimates for individual gap completion; identify strategies and actions to overcome gaps; and present an overall cost and time frame for completion of the Bay Trail system."

- \* Table 3.5-10 and the preceding text, on p. 3.5-37 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, "Project Description Revisions and Clarifications, and the Revised Proposed Project," of this RTC document. The changes to the Draft EIR are as follows:

As shown in the table, the proposed project would generate approximately ~~3,860,063~~ person-trips during the weekday a.m. peak hour: ~~3,783,986~~ on the 700 Innes property and 77 on the India Basin Shoreline Park, 900 Innes, and India Basin Open Space properties. During the weekday p.m. peak hour, the proposed project would generate ~~4,722,559~~ person-trips: ~~4,636,474~~ on the 700 Innes property and 85 on the other three project site properties.

By contrast, the variant would generate approximately 5,077 person-trips during the weekday a.m. peak hour: 5,000 on the 700 Innes property and 77 on the India Basin Shoreline Park, 900 Innes, and India Basin Open Space properties. During the weekday p.m. peak hour, the variant would generate 6,117 person-trips: 6,031 on the 700 Innes property and 85 on the other three project site properties.

**Table 3.5-10: Summary of Project Person-Trips**

Land-Use	Person-Trips (Weekday)							
	Proposed Project				Variant			
	Size	Daily	A.M. Peak Hour	P.M. Peak Hour	Size	Daily	A.M. Peak Hour	P.M. Peak Hour
<b>700 Innes Property</b>								
Residential								
Studio	198 units	1,485	198	257	50 units	375	50	65
1-bedroom	236 units	1,770	235	306	125 units	938	125	162
2-bedroom + <sup>+</sup>	805 units	8,050	1,072	1,393	324 units	3,240	432	561
<i>Subtotal</i>	<i>1,239 units</i>	<i>11,305</i>	<i>1,505</i>	<i>1,956</i>	<i>499 units</i>	<i>4,553</i>	<i>607</i>	<i>788</i>
Commercial								
General office	174,930 sq. ft.	3,166	282	269	400,000 sq. ft.	7,240	644	615
R&D	–	–	–	–	275,000 sq. ft.	4,978	443	423
Clinical-use	–	–	–	–	85,000 sq. ft.	3,681	559	534
Administrative	–	–	–	–	100,000 sq. ft.	3,640	618	590
<i>Subtotal</i>	<i>174,930 sq. ft.</i>	<i>3,166</i>	<i>282</i>	<i>269</i>	<i>860,000 sq. ft.</i>	<i>19,539</i>	<i>2,264</i>	<i>2,162</i>
Retail								
Restaurant	15,000 sq. ft.	3,000	44	405	25,000 sq. ft.	5,000	73	675
Café	20,000 sq. ft.	4,000	593	540	20,000 sq. ft.	4,000	593	540
Supermarket	25,000 sq. ft.	7,425	194	542	25,000 sq. ft.	7,425	194	542
General retail	40,400 sq. ft.	6,060	141	545	70,000 sq. ft.	10,500	245	945
<i>Subtotal</i>	<i>100,400 sq. ft.</i>	<i>20,485</i>	<i>972</i>	<i>2,032</i>	<i>140,000 sq. ft.</i>	<i>26,925</i>	<i>1,105</i>	<i>2,702</i>
Educational								
Students	450 persons	1,890	945	297	450 persons	1,890	945	297
Faculty/staff	95 persons	190	48	48	95 persons	190	48	48
<i>Subtotal</i>	<i>545 persons</i>	<i>2,080</i>	<i>993</i>	<i>345</i>	<i>545 persons</i>	<i>2,080</i>	<i>993</i>	<i>345</i>
Open space								
Open space	5.4 acres	131	31	34	5.4 acres	131	31	34
<i>Subtotal</i>	<i>5.4 acres</i>	<i>131</i>	<i>31</i>	<i>34</i>	<i>5.4 acres</i>	<i>131</i>	<i>31</i>	<i>34</i>
<i>Subtotal</i>	–	<i>37,167</i>	<i>3,783</i>	<i>4,636</i>	–	<i>53,228</i>	<i>5,000</i>	<i>6,031</i>
<b>India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties</b>								
Open space								
IB Shoreline Pk.	5.6 acres	137	32	35	5.6 acres	137	32	35
900 Innes	1.8 acres	44	10	11	1.8 acres	44	10	11
IB Open Space	6.2 acres	152	35	39	6.2 acres	152	35	39
<i>Subtotal</i>	<i>13.6 acres</i>	<i>333</i>	<i>77</i>	<i>85</i>	<i>13.6 acres</i>	<i>333</i>	<i>77</i>	<i>85</i>
<b>Total</b>	–	<b>37,500</b>	<b>3,860</b>	<b>4,722</b>	–	<b>53,561</b>	<b>5,077</b>	<b>6,117</b>

## Notes:

IB = India Basin; Pl. = Park; R&D = research and development; RPD = San Francisco Recreation & Parks Department; sq. ft. = square feet

<sup>1</sup>The unit count for 2-bedroom and larger units is one fewer than listed in Chapter 2.0, "Project Description," because it does not include one existing private residence at the project site that would be relocated, and therefore, would not affect travel demand.

Source: San Francisco, 2017.

(Revised) **Table 3.5-10: Summary of Project Person-Trips**

<u>Land Use</u>	<u>Person-Trips (Weekday)</u>							
	<u>Proposed Project</u>				<u>Variants</u>			
	<u>Size</u>	<u>Daily</u>	<u>A.M. Peak Hour</u>	<u>P.M. Peak Hour</u>	<u>Size</u>	<u>Daily</u>	<u>A.M. Peak Hour</u>	<u>P.M. Peak Hour</u>
<b><u>700 Innes Property</u></b>								
<u>Residential</u>								
<u>Studio</u>	<u>252 units</u>	<u>1,890</u>	<u>252</u>	<u>327</u>	<u>50 units</u>	<u>375</u>	<u>50</u>	<u>65</u>
<u>1-bedroom</u>	<u>300 units</u>	<u>2,250</u>	<u>299</u>	<u>389</u>	<u>125 units</u>	<u>938</u>	<u>125</u>	<u>162</u>
<u>2-bedroom +<sup>1</sup></u>	<u>1023 units</u>	<u>10,230</u>	<u>1,362</u>	<u>1,770</u>	<u>324 units</u>	<u>3,240</u>	<u>432</u>	<u>561</u>
<u>Subtotal</u>	<u>1,575 units</u>	<u>14,370</u>	<u>1,913</u>	<u>2,486</u>	<u>499 units</u>	<u>4,553</u>	<u>607</u>	<u>788</u>
<u>Commercial</u>								
<u>General office</u>	<u>121,915 sq. ft.</u>	<u>2,207</u>	<u>197</u>	<u>188</u>	<u>400,000 sq. ft.</u>	<u>7,240</u>	<u>644</u>	<u>615</u>
<u>R&amp;D</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>275,000 sq. ft.</u>	<u>4,978</u>	<u>443</u>	<u>423</u>
<u>Clinical use</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>85,000 sq. ft.</u>	<u>3,681</u>	<u>559</u>	<u>534</u>
<u>Administrative</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>100,000 sq. ft.</u>	<u>3,640</u>	<u>618</u>	<u>590</u>
<u>Subtotal</u>	<u>121,915 sq. ft.</u>	<u>2,207</u>	<u>197</u>	<u>188</u>	<u>860,000 sq. ft.</u>	<u>19,539</u>	<u>2,264</u>	<u>2,162</u>
<u>Retail</u>								
<u>Restaurant</u>	<u>13,026 sq. ft.</u>	<u>2,605</u>	<u>38</u>	<u>352</u>	<u>25,000 sq. ft.</u>	<u>5,000</u>	<u>73</u>	<u>675</u>
<u>Café</u>	<u>17,369 sq. ft.</u>	<u>3,474</u>	<u>515</u>	<u>469</u>	<u>20,000 sq. ft.</u>	<u>4,000</u>	<u>593</u>	<u>540</u>
<u>Supermarket</u>	<u>21,711 sq. ft.</u>	<u>6,448</u>	<u>169</u>	<u>471</u>	<u>25,000 sq. ft.</u>	<u>7,425</u>	<u>194</u>	<u>542</u>
<u>General retail</u>	<u>35,085 sq. ft.</u>	<u>5,263</u>	<u>123</u>	<u>474</u>	<u>70,000 sq. ft.</u>	<u>10,500</u>	<u>245</u>	<u>945</u>
<u>Subtotal</u>	<u>87,191 sq. ft.</u>	<u>17,790</u>	<u>8452</u>	<u>1,766</u>	<u>140,000 sq. ft.</u>	<u>26,925</u>	<u>1,105</u>	<u>2,702</u>
<u>Educational</u>								
<u>Students</u>	<u>0 persons</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>450 persons</u>	<u>1,890</u>	<u>945</u>	<u>297</u>
<u>Faculty/staff</u>	<u>0 persons</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>95 persons</u>	<u>190</u>	<u>48</u>	<u>48</u>
<u>Subtotal</u>	<u>0 persons</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>545 persons</u>	<u>2,080</u>	<u>993</u>	<u>345</u>
<u>Open space</u>								
<u>Open space</u>	<u>5.4 acres</u>	<u>131</u>	<u>31</u>	<u>34</u>	<u>5.4 acres</u>	<u>131</u>	<u>31</u>	<u>34</u>
<u>Subtotal</u>	<u>5.4 acres</u>	<u>131</u>	<u>31</u>	<u>34</u>	<u>5.4 acres</u>	<u>131</u>	<u>31</u>	<u>34</u>
<u>Subtotal</u>	<u>=</u>	<u>34,498</u>	<u>2,986</u>	<u>4,474</u>	<u>=</u>	<u>53,228</u>	<u>5,000</u>	<u>6,031</u>

**India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties**

Open space

<u>IB Shoreline Pk.</u>	<u>5.6 acres</u>	<u>137</u>	<u>32</u>	<u>35</u>	<u>5.6 acres</u>	<u>137</u>	<u>32</u>	<u>35</u>
<u>900 Innes</u>	<u>1.8 acres</u>	<u>44</u>	<u>10</u>	<u>11</u>	<u>1.8 acres</u>	<u>44</u>	<u>10</u>	<u>11</u>
<u>IB Open Space</u>	<u>6.2 acres</u>	<u>152</u>	<u>35</u>	<u>39</u>	<u>6.2 acres</u>	<u>152</u>	<u>35</u>	<u>39</u>
<u>Subtotal</u>	<u>13.6 acres</u>	<u>333</u>	<u>77</u>	<u>85</u>	<u>13.6 acres</u>	<u>333</u>	<u>77</u>	<u>85</u>
<b><u>Total</u></b>	<b><u>=</u></b>	<b><u>34,831</u></b>	<b><u>3,063</u></b>	<b><u>4,559</u></b>	<b><u>=</u></b>	<b><u>53,561</u></b>	<b><u>5,077</u></b>	<b><u>6,117</u></b>

Notes:

IB = India Basin; Pk. = Park; R&D = research and development; RPD = San Francisco Recreation & Parks Department; sq. ft. = square feet

<sup>1</sup>The unit count for 2-bedroom and larger units is one fewer than listed in Chapter 2.0, "Project Description," because it does not include one existing private residence at the project site that would be relocated, and therefore, would not affect travel demand.

Source: San Francisco, 2017.

- \* Table 3.5-11, on p. 3.5-40 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, "Project Description Revisions and Clarifications, and the Revised Proposed Project," of this RTC document. The changes to the Draft EIR are as follows:

(Revised) **Table 3.5-11: Project Travel Demand by Mode and Land Use (Proposed Project)**

Land Use or Property		Person-Trips by Mode					Vehicle-Trips		Transit Person-Trips	
		Auto	Transit	Bicycle	Walk	Total	In	Out	In	Out
<b>Baseline plus Project Conditions (Proposed Project)</b>										
<b>Weekday A.M. Peak Hour</b>										
700 Innes Property	Residential	<u>1,094</u> <u>1,386</u>	<u>143</u> <u>182</u>	<u>45</u> <u>57</u>	<u>226</u> <u>287</u>	<u>1,505</u> <u>1,912</u>	<u>201</u> <u>255</u>	<u>447</u> <u>568</u>	<u>44</u> <u>56</u>	<u>99</u> <u>126</u>
	Commercial	<u>194</u> <u>135</u>	<u>37</u> <u>26</u>	<u>8</u> <u>6</u>	<u>42</u> <u>29</u>	<u>281</u> <u>196</u>	<u>122</u> <u>196</u>	<u>17</u> <u>85</u>	<u>33</u> <u>23</u>	<u>4</u> <u>3</u>
	Retail	<u>754</u> <u>655</u>	<u>43</u> <u>37</u>	<u>29</u> <u>25</u>	<u>146</u> <u>127</u>	<u>972</u> <u>844</u>	<u>253</u> <u>221</u>	<u>145</u> <u>125</u>	<u>27</u> <u>24</u>	<u>16</u> <u>13</u>
	School	<u>9</u> <u>15</u>	<u>1</u> <u>4</u>	<u>5</u>	<u>5</u> <u>9</u>	<u>9</u> <u>93</u>	<u>4</u> <u>27</u>	<u>1</u> <u>67</u>	<u>1</u> <u>4</u>	<u>0</u>
	Open space	<u>2</u> <u>620</u>	<u>0</u>	<u>4</u> <u>14</u>	<u>1</u> <u>5</u>	<u>31</u> <u>109</u>	<u>1</u> <u>448</u>	<u>1</u> <u>138</u>	<u>0</u>	<u>0</u>
	<b>Subtotal</b>	<b><u>2,980</u><u>2,666</u></b>	<b><u>237</u><u>245</u></b>	<b><u>91</u><u>102</u></b>	<b><u>474</u><u>448</u></b>	<b><u>3,782</u><u>3,061</u></b>	<b><u>1,017</u><u>609</u></b>	<b><u>787</u><u>743</u></b>	<b><u>118</u><u>103</u></b>	<b><u>119</u><u>142</u></b>
India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties	IB Shore. Pk.	<u>26</u>	<u>0</u>	<u>4</u>	<u>1</u>	<u>32</u>	<u>14</u>	<u>11</u>	<u>0</u>	<u>0</u>
	900 Innes	<u>9</u>	<u>0</u>	<u>1</u>	<u>0</u>	<u>10</u>	<u>5</u>	<u>4</u>	<u>0</u>	<u>0</u>
	IB Op. Space	<u>29</u>	<u>0</u>	<u>5</u>	<u>3</u>	<u>36</u>	<u>15</u>	<u>12</u>	<u>0</u>	<u>0</u>
	<b>Subtotal</b>	<b><u>64</u></b>	<b><u>0</u></b>	<b><u>10</u></b>	<b><u>4</u></b>	<b><u>78</u></b>	<b><u>34</u></b>	<b><u>27</u></b>	<b><u>0</u></b>	<b><u>0</u></b>
<b>Total</b>		<b><u>3,044</u><u>2,330</u></b>	<b><u>237</u><u>245</u></b>	<b><u>101</u><u>112</u></b>	<b><u>478</u><u>452</u></b>	<b><u>3,860</u><u>3,139</u></b>	<b><u>1,051</u><u>643</u></b>	<b><u>814</u><u>770</u></b>	<b><u>118</u><u>103</u></b>	<b><u>119</u><u>142</u></b>
<b>Weekday P.M. Peak Hour</b>										
700 Innes Property	Residential	<u>1,330</u> <u>1,690</u>	<u>176</u> <u>224</u>	<u>39</u> <u>50</u>	<u>411</u> <u>522</u>	<u>1,956</u> <u>2,486</u>	<u>506</u> <u>643</u>	<u>284</u> <u>361</u>	<u>160</u> <u>203</u>	<u>16</u> <u>21</u>
	Commercial	<u>175</u> <u>122</u>	<u>33</u> <u>23</u>	<u>5</u> <u>4</u>	<u>57</u> <u>39</u>	<u>270</u> <u>188</u>	<u>129</u> <u>137</u>	<u>11</u> <u>78</u>	<u>1</u>	<u>32</u> <u>22</u>
	Retail	<u>1,476</u> <u>1,281</u>	<u>89</u> <u>78</u>	<u>41</u> <u>35</u>	<u>427</u> <u>371</u>	<u>2,033</u> <u>1,765</u>	<u>376</u> <u>327</u>	<u>403</u> <u>350</u>	<u>39</u> <u>34</u>	<u>50</u> <u>44</u>
	School	<u>3</u> <u>21</u>	<u>4</u>	<u>1</u>	<u>1</u> <u>9</u>	<u>3</u> <u>45</u>	<u>6</u> <u>2</u>	<u>1</u> <u>46</u>	<u>0</u>	<u>4</u>
	Open space	<u>2</u> <u>070</u>	<u>0</u>	<u>5</u> <u>17</u>	<u>9</u> <u>33</u>	<u>34</u> <u>120</u>	<u>1</u> <u>138</u>	<u>8</u> <u>29</u>	<u>0</u>	<u>0</u>
	<b>Subtotal</b>	<b><u>3,322</u><u>3,163</u></b>	<b><u>302</u><u>325</u></b>	<b><u>91</u><u>106</u></b>	<b><u>923</u><u>965</u></b>	<b><u>4,638</u><u>4,559</u></b>	<b><u>967</u><u>1,017</u></b>	<b><u>954</u><u>818</u></b>	<b><u>200</u><u>238</u></b>	<b><u>102</u><u>87</u></b>
India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties	IB Shore. Pk.	<u>21</u>	<u>0</u>	<u>5</u>	<u>10</u>	<u>35</u>	<u>11</u>	<u>9</u>	<u>0</u>	<u>0</u>
	900 Innes	<u>7</u>	<u>0</u>	<u>2</u>	<u>3</u>	<u>11</u>	<u>4</u>	<u>3</u>	<u>0</u>	<u>0</u>
	IB Op. Space	<u>22</u>	<u>0</u>	<u>5</u>	<u>11</u>	<u>38</u>	<u>12</u>	<u>9</u>	<u>0</u>	<u>0</u>
	<b>Subtotal</b>	<b><u>50</u></b>	<b><u>0</u></b>	<b><u>12</u></b>	<b><u>24</u></b>	<b><u>84</u></b>	<b><u>27</u></b>	<b><u>21</u></b>	<b><u>0</u></b>	<b><u>0</u></b>
<b>Total</b>		<b><u>3,372</u><u>6,535</u></b>	<b><u>302</u><u>325</u></b>	<b><u>103</u><u>118</u></b>	<b><u>947</u><u>989</u></b>	<b><u>4,724</u><u>4,643</u></b>	<b><u>994</u><u>1,044</u></b>	<b><u>975</u><u>839</u></b>	<b><u>200</u><u>238</u></b>	<b><u>102</u><u>87</u></b>
<b>Cumulative plus Project Conditions (Proposed Project)</b>										
<b>Weekday A.M. Peak Hour</b>										
700 Innes Property	Residential	<u>970</u> <u>1,233</u>	<u>263</u> <u>335</u>	<u>45</u> <u>57</u>	<u>226</u> <u>287</u>	<u>1,504</u> <u>1,912</u>	<u>178</u> <u>226</u>	<u>397</u> <u>504</u>	<u>82</u> <u>104</u>	<u>181</u> <u>231</u>
	Commercial	<u>172</u> <u>120</u>	<u>60</u> <u>41</u>	<u>8</u> <u>6</u>	<u>42</u> <u>29</u>	<u>282</u> <u>196</u>	<u>108</u> <u>75</u>	<u>15</u> <u>10</u>	<u>53</u> <u>36</u>	<u>7</u> <u>5</u>
	Retail	<u>676</u> <u>587</u>	<u>121</u> <u>105</u>	<u>29</u> <u>25</u>	<u>146</u> <u>127</u>	<u>972</u> <u>844</u>	<u>227</u> <u>198</u>	<u>130</u> <u>112</u>	<u>77</u> <u>67</u>	<u>44</u> <u>38</u>
	School	<u>8</u> <u>36</u>	<u>9</u> <u>3</u>	<u>5</u> <u>5</u>	<u>5</u> <u>9</u>	<u>9</u> <u>93</u>	<u>3</u> <u>90</u>	<u>1</u> <u>53</u>	<u>9</u> <u>3</u>	<u>0</u>
	Open space	<u>2</u> <u>381</u>	<u>3</u> <u>9</u>	<u>4</u> <u>14</u>	<u>1</u> <u>5</u>	<u>31</u> <u>109</u>	<u>1</u> <u>243</u>	<u>1</u> <u>034</u>	<u>1</u> <u>5</u>	<u>1</u> <u>5</u>
	<b>Subtotal</b>	<b><u>2,677</u><u>2,021</u></b>	<b><u>540</u><u>489</u></b>	<b><u>91</u><u>102</u></b>	<b><u>474</u><u>448</u></b>	<b><u>3,782</u><u>3,061</u></b>	<b><u>915</u><u>542</u></b>	<b><u>705</u><u>660</u></b>	<b><u>306</u><u>212</u></b>	<b><u>233</u><u>279</u></b>
India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties	IB Shore. Pk.	<u>24</u>	<u>3</u>	<u>4</u>	<u>1</u>	<u>32</u>	<u>13</u>	<u>10</u>	<u>1</u>	<u>1</u>
	900 Innes	<u>8</u>	<u>1</u>	<u>1</u>	<u>0</u>	<u>10</u>	<u>4</u>	<u>3</u>	<u>0</u>	<u>0</u>
	IB Op. Space	<u>26</u>	<u>3</u>	<u>4</u>	<u>3</u>	<u>36</u>	<u>14</u>	<u>11</u>	<u>3</u>	<u>3</u>
	<b>Subtotal</b>	<b><u>58</u></b>	<b><u>7</u></b>	<b><u>9</u></b>	<b><u>4</u></b>	<b><u>78</u></b>	<b><u>31</u></b>	<b><u>24</u></b>	<b><u>4</u></b>	<b><u>4</u></b>
<b>Total</b>		<b><u>2,735</u><u>2,079</u></b>	<b><u>546</u><u>496</u></b>	<b><u>101</u><u>111</u></b>	<b><u>478</u><u>452</u></b>	<b><u>3,860</u><u>2,139</u></b>	<b><u>946</u><u>573</u></b>	<b><u>729</u><u>684</u></b>	<b><u>310</u><u>216</u></b>	<b><u>237</u><u>283</u></b>
<b>Weekday P.M. Peak Hour</b>										
700 Innes Property	Residential	<u>1,173</u> <u>1,492</u>	<u>332</u> <u>423</u>	<u>39</u> <u>50</u>	<u>411</u> <u>522</u>	<u>1,955</u> <u>2,487</u>	<u>476</u> <u>605</u>	<u>219</u> <u>279</u>	<u>264</u> <u>335</u>	<u>68</u> <u>88</u>
	Commercial	<u>153</u> <u>106</u>	<u>55</u> <u>38</u>	<u>5</u> <u>4</u>	<u>57</u> <u>39</u>	<u>270</u> <u>187</u>	<u>11</u> <u>7</u>	<u>98</u> <u>69</u>	<u>3</u> <u>2</u>	<u>52</u> <u>36</u>
	Retail	<u>1,313</u> <u>1,140</u>	<u>252</u> <u>219</u>	<u>41</u> <u>35</u>	<u>427</u> <u>371</u>	<u>2,033</u> <u>1,765</u>	<u>361</u> <u>313</u>	<u>333</u> <u>289</u>	<u>117</u> <u>102</u>	<u>135</u> <u>117</u>
	School	<u>2</u> <u>93</u>	<u>3</u> <u>2</u>	<u>1</u> <u>1</u>	<u>1</u> <u>9</u>	<u>3</u> <u>45</u>	<u>5</u> <u>7</u>	<u>1</u> <u>33</u>	<u>0</u>	<u>3</u> <u>2</u>
	Open space	<u>1</u> <u>760</u>	<u>3</u> <u>10</u>	<u>5</u> <u>17</u>	<u>9</u> <u>33</u>	<u>34</u> <u>120</u>	<u>9</u> <u>33</u>	<u>7</u> <u>25</u>	<u>1</u> <u>5</u>	<u>1</u> <u>5</u>
	<b>Subtotal</b>	<b><u>2,949</u><u>2,797</u></b>	<b><u>674</u><u>690</u></b>	<b><u>91</u><u>106</u></b>	<b><u>923</u><u>965</u></b>	<b><u>4,637</u><u>4,559</u></b>	<b><u>914</u><u>958</u></b>	<b><u>790</u><u>662</u></b>	<b><u>385</u><u>444</u></b>	<b><u>288</u><u>246</u></b>
India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties	IB Shore. Pk.	<u>18</u>	<u>3</u>	<u>5</u>	<u>10</u>	<u>35</u>	<u>10</u>	<u>7</u>	<u>1</u>	<u>1</u>
	900 Innes	<u>6</u>	<u>1</u>	<u>2</u>	<u>3</u>	<u>11</u>	<u>3</u>	<u>2</u>	<u>0</u>	<u>0</u>
	IB Op. Space	<u>19</u>	<u>3</u>	<u>5</u>	<u>11</u>	<u>40</u>	<u>11</u>	<u>8</u>	<u>3</u>	<u>3</u>
	<b>Subtotal</b>	<b><u>43</u></b>	<b><u>7</u></b>	<b><u>12</u></b>	<b><u>24</u></b>	<b><u>86</u></b>	<b><u>24</u></b>	<b><u>17</u></b>	<b><u>4</u></b>	<b><u>4</u></b>
<b>Total</b>		<b><u>2,992</u><u>2,840</u></b>	<b><u>681</u><u>697</u></b>	<b><u>103</u><u>118</u></b>	<b><u>947</u><u>989</u></b>	<b><u>4,723</u><u>4,645</u></b>	<b><u>938</u><u>982</u></b>	<b><u>808</u><u>679</u></b>	<b><u>389</u><u>448</u></b>	<b><u>292</u><u>250</u></b>

Notes:

IB Op. Space = India Basin Open Space; IB Shore. Pk. = India Basin Shoreline Park; RPD = San Francisco Recreation & Parks Department

Numbers shown do not reflect retail pass-by trip reductions.

Source: San Francisco, 2017, compiled by AECOM in 2018

\* Table 3.5-13, on p. 3.5-42 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Table 3.5-13: Project Loading Demand**

Land Use	Proposed Project			Variant		
	Daily Truck Trips	Loading Demand (spaces)		Daily Truck Trips	Loading Demand (spaces)	
		Average Hour	Peak Hour		Average Hour	Peak Hour
<b><i>700 Innes Property</i></b>						
Residential	37	1.7	2.2	13	0.6	0.7
Commercial	37	1.7	2.1	181	8.4	10.5
Restaurant	126	5.8	7.3	162	7.5	9.4
Supermarket	32	1.9	2.9	32	1.9	2.9
General retail	9	0.4	0.5	15	0.7	0.9
School	5	0.2	0.3	5	0.2	0.3
Open space	–	–	–	–	–	–
<i>Subtotal</i>	<i>246</i>	<i>11.8</i>	<i>15.3</i>	<i>408</i>	<i>19.3</i>	<i>24.6</i>
<b><i>India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties</i></b>						
IB Shoreline Park	–	–	–	–	–	–
900 Innes	–	–	–	–	–	–
IB Open Space	–	–	–	–	–	–
<i>Subtotal</i>	<i>–</i>	<i>–</i>	<i>–</i>	<i>–</i>	<i>–</i>	<i>–</i>
<b>Total</b>	<b>246</b>	<b>11.8</b>	<b>15.3</b>	<b>408</b>	<b>19.3</b>	<b>24.6</b>

Note:  
 IB – India Basin  
 Source: San Francisco, 2017.

(Revised) **Table 3.5-13: Project Loading Demand**

Land Use	Proposed Project			Variant		
	Daily Truck Trips	Loading Demand (spaces)		Daily Truck Trips	Loading Demand (spaces)	
		Average Hour	Peak Hour		Average Hour	Peak Hour
<b><i>700 Innes Property</i></b>						
<u>Residential</u>	<u>41</u>	<u>1.9</u>	<u>2.4</u>	<u>13</u>	<u>0.6</u>	<u>0.7</u>
<u>Commercial</u>	<u>26</u>	<u>1.2</u>	<u>1.5</u>	<u>181</u>	<u>8.4</u>	<u>10.5</u>
<u>Restaurant</u>	<u>109</u>	<u>5.1</u>	<u>6.3</u>	<u>162</u>	<u>7.5</u>	<u>9.4</u>
<u>Supermarket</u>	<u>27</u>	<u>1.7</u>	<u>2.5</u>	<u>32</u>	<u>1.9</u>	<u>2.9</u>
<u>General retail</u>	<u>8</u>	<u>0.4</u>	<u>0.4</u>	<u>15</u>	<u>0.7</u>	<u>0.9</u>
<u>School</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>5</u>	<u>0.2</u>	<u>0.3</u>

<u>Open space</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>
<u>Subtotal</u>	<u>211</u>	<u>10.2</u>	<u>13.1</u>	<u>408</u>	<u>19.3</u>	<u>24.6</u>
<b><u>India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties</u></b>						
<u>IB Shoreline Park</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>
<u>900 Innes</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>
<u>IB Open Space</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>
<u>Subtotal</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>	<u>≡</u>
<b><u>Total</u></b>	<b><u>211</u></b>	<b><u>10.2</u></b>	<b><u>13.1</u></b>	<b><u>408</u></b>	<b><u>19.3</u></b>	<b><u>24.6</u></b>

Note:  
 IB = India Basin  
 Source: San Francisco, 2017.

\* Table 3.5-14, on p. 3.5-43 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Table 3.5-14: Project Parking Demand**

Land Use	Weekday Peak Parking Demand (spaces)											
	Proposed Project						Variant					
	Midday			Evening			Midday			Evening		
	Long-Term	Short-Term	Total	Long-Term	Short-Term	Total	Long-Term	Short-Term	Total	Long-Term	Short-Term	Total
<b><i>700 Innes Property</i></b>												
Residential	1,276	–	1,276	1,595	–	1,595	514	–	514	642	–	642
Commercial	366	15	381	–	–	–	1,801	99	1,900	–	–	–
Retail	166	678	844	166	678	844	231	927	1,158	231	927	1,158
School	29	–	29	–	–	–	29	–	29	–	–	–
Open space	–	7	7	–	–	–	–	7	7	–	–	–
<i>Subtotal</i>	<i>1,837</i>	<i>700</i>	<i>2,537</i>	<i>1,761</i>	<i>678</i>	<i>2,439</i>	<i>2,575</i>	<i>1,033</i>	<i>3,608</i>	<i>873</i>	<i>927</i>	<i>1,800</i>
<b><i>India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties</i></b>												
IB Shoreline Park	–	7	7	–	–	–	–	7	7	–	–	–
900 Innes	–	2	2	–	–	–	–	2	2	–	–	–
IB Open Space	–	7	7	–	–	–	–	7	7	–	–	–
<i>Subtotal</i>	<i>–</i>	<i>16</i>	<i>16</i>	<i>–</i>	<i>–</i>	<i>–</i>	<i>–</i>	<i>16</i>	<i>16</i>	<i>–</i>	<i>–</i>	<i>–</i>
<b>Total</b>	<b>1,837</b>	<b>716</b>	<b>2,553</b>	<b>1,761</b>	<b>678</b>	<b>2,439</b>	<b>2,575</b>	<b>1,049</b>	<b>3,624</b>	<b>873</b>	<b>927</b>	<b>1,800</b>

Note:  
 IB = India Basin  
 Source: San Francisco, 2017.

(Revised) **Table 3.5-14: Project Parking Demand**

<u>Land Use</u>	<u>Weekday Peak Parking Demand (spaces)</u>											
	<u>Proposed Project</u>						<u>Variant</u>					
	<u>Midday</u>			<u>Evening</u>			<u>Midday</u>			<u>Evening</u>		
	<u>Long-Term</u>	<u>Short-Term</u>	<u>Total</u>	<u>Long-Term</u>	<u>Short-Term</u>	<u>Total</u>	<u>Long-Term</u>	<u>Short-Term</u>	<u>Total</u>	<u>Long-Term</u>	<u>Short-Term</u>	<u>Total</u>
<b><u>700 Innes Property</u></b>												
<u>Residential</u>	<u>1,561</u>	<u>=</u>	<u>1,561</u>	<u>1,951</u>	<u>=</u>	<u>1,951</u>	<u>514</u>	<u>=</u>	<u>514</u>	<u>642</u>	<u>=</u>	<u>642</u>
<u>Commercial</u>	<u>255</u>	<u>11</u>	<u>266</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>1,801</u>	<u>99</u>	<u>1,900</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>Retail</u>	<u>144</u>	<u>588</u>	<u>732</u>	<u>144</u>	<u>588</u>	<u>732</u>	<u>231</u>	<u>927</u>	<u>1,158</u>	<u>231</u>	<u>927</u>	<u>1,158</u>
<u>School</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>29</u>	<u>=</u>	<u>29</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>Open space</u>	<u>=</u>	<u>23</u>	<u>7</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>7</u>	<u>7</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>Subtotal</u>	<u>1,960</u>	<u>622</u>	<u>2,583</u>	<u>2,095</u>	<u>588</u>	<u>2,684</u>	<u>2,575</u>	<u>1,033</u>	<u>3,608</u>	<u>873</u>	<u>927</u>	<u>1,800</u>
<b><u>India Basin Shoreline Park, 900 Innes, and India Basin Open Space Properties</u></b>												
<u>IB Shoreline Park</u>	<u>=</u>	<u>7</u>	<u>7</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>7</u>	<u>7</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>900 Innes</u>	<u>=</u>	<u>2</u>	<u>2</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>2</u>	<u>2</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>IB Open Space</u>	<u>=</u>	<u>7</u>	<u>7</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>7</u>	<u>7</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>Subtotal</u>	<u>=</u>	<u>16</u>	<u>16</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>16</u>	<u>16</u>	<u>=</u>	<u>=</u>	<u>=</u>
<b><u>Total</u></b>	<b><u>1,960</u></b>	<b><u>638</u></b>	<b><u>2,599</u></b>	<b><u>2,095</u></b>	<b><u>588</u></b>	<b><u>2,685</u></b>	<b><u>2,575</u></b>	<b><u>1,049</u></b>	<b><u>3,624</u></b>	<b><u>873</u></b>	<b><u>927</u></b>	<b><u>1,800</u></b>

Note:

IB = India Basin

Source: San Francisco, 2017.

\* The text describing the development program for the proposed project and variant, on p. 3.5-44 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Project Features**

**Development Program**

As described in detail in Section 2.5, “Project Components,” both the proposed project and the variant would involve demolishing some of the existing buildings on the project site and constructing a mixed-use development that would include residential, commercial, institutional/ educational, ~~R&D~~, parking, and open space uses.

- Under the proposed project, the development program for the site would consist of approximately ~~4,240,100~~1,506,324 gross square feet (gsf) of residential space (~~4,240~~1,575 units); ~~275,330~~209,106 gsf of commercial space; ~~50,000~~ gsf of institutional/educational space; and 24.5 acres of publicly accessible recreation/open space. The proposed project would also include 1,800 off-street automobile parking spaces and ~~4,240~~1,575 bicycle parking spaces.



- Under the variant, the development program for the site would consist of approximately 417,300 gsf of residential space (500 units); 1,000,000 gsf of commercial space; 50,000 gsf of institutional/educational space; and 24.5 acres of publicly accessible recreation/open space. The variant would also include ~~1,912~~1,932 off-street automobile parking spaces and 500 bicycle parking spaces.

\* Table 3.5-16, on p. 3.5-51 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Table 3.5-16: Muni Downtown Screenlines – Baseline plus Project Conditions (Proposed Project)**

Screenline	Baseline Conditions						Baseline plus Project Conditions (Proposed Project)					
	Weekday A.M. Peak Hour <sup>†</sup>			Weekday P.M. Peak Hour <sup>†</sup>			Weekday A.M. Peak Hour <sup>†</sup>			Weekday P.M. Peak Hour <sup>†</sup>		
	Rider-ship	Capa-city	Utili-zation	Rider-ship	Capa-city	Utili-zation	Added	Total	Utili-zation	Added	Total	Utili-zation
<b>Northeast Screenline</b>												
Kearny/Stockton	2,211	3,050	72%	2,245	3,327	67%	3	2,214	73%	3	2,248	68%
Other lines	538	1,141	47%	683	1,078	63%	1	539	47%	1	684	63%
<b>Total</b>	<b>2,749</b>	<b>4,191</b>	<b>66%</b>	<b>2,928</b>	<b>4,405</b>	<b>66%</b>	<b>4</b>	<b>2,753</b>	<b>66%</b>	<b>4</b>	<b>2,932</b>	<b>67%</b>
<b>Northwest Screenline</b>												
Geary	1,821	2,490	73%	1,964	2,623	75%	2	1,823	73%	2	1,966	75%
California	1,610	2,010	80%	1,322	1,752	75%	1	1,611	80%	1	1,323	76%
Sutter/Clement	480	630	76%	425	630	67%	1	481	76%	1	426	68%
Fulton/Hayes	1,277	1,680	76%	1,184	1,323	<b>89%</b>	1	1,278	76%	1	1,185	<b>90%</b>
Balboa	758	1,019	74%	625	974	64%	1	759	74%	1	626	64%
<b>Total</b>	<b>5,946</b>	<b>7,829</b>	<b>76%</b>	<b>5,520</b>	<b>7,302</b>	<b>76%</b>	<b>6</b>	<b>5,952</b>	<b>76%</b>	<b>6</b>	<b>5,526</b>	<b>76%</b>
<b>Southeast Screenline</b>												
Third Street	359	793	45%	788	793	<b>99%</b>	22	381	48%	37	825	<b>104%</b>
Mission	1,643	2,509	65%	1,407	2,601	54%	0	1,643	65%	0	1,407	54%
San Bruno/Bayshore	1,690	2,134	79%	1,536	2,134	72%	2	1,692	79%	4	1,540	72%
Other lines	1,468	1,756	84%	1,085	1,675	65%	5	1,473	84%	9	1,094	65%
<b>Total</b>	<b>5,160</b>	<b>7,192</b>	<b>72%</b>	<b>4,816</b>	<b>7,203</b>	<b>67%</b>	<b>29</b>	<b>5,189</b>	<b>72%</b>	<b>50</b>	<b>4,866</b>	<b>68%</b>
<b>Southwest Screenline</b>												
Subway lines	6,330	6,205	<b>102%</b>	4,904	6,164	80%	0	6,330	<b>102%</b>	0	4,904	80%
Haight/Noriega	1,121	1,554	72%	977	1,554	63%	1	1,122	72%	1	978	63%
Other lines	465	700	66%	555	700	79%	0	465	66%	0	555	79%
<b>Total</b>	<b>7,916</b>	<b>8,459</b>	<b>94%</b>	<b>6,436</b>	<b>8,418</b>	<b>76%</b>	<b>1</b>	<b>7,917</b>	<b>94%</b>	<b>1</b>	<b>6,437</b>	<b>76%</b>

Notes:

**Bold** indicates capacity utilization of 85 percent or greater.

<sup>†</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

(Revised) **Table 3.5-16: Muni Downtown Screenlines—Baseline plus Project Conditions (Proposed Project)**

<u>Screenline</u>	<u>Baseline Conditions</u>						<u>Baseline plus Project Conditions (Proposed Project)</u>					
	<u>Weekday A.M. Peak Hour<sup>1</sup></u>			<u>Weekday P.M. Peak Hour<sup>1</sup></u>			<u>Weekday A.M. Peak Hour<sup>1</sup></u>			<u>Weekday P.M. Peak Hour<sup>1</sup></u>		
	<u>Rider-ship</u>	<u>Capa-city</u>	<u>Utili-zation</u>	<u>Rider-ship</u>	<u>Capa-city</u>	<u>Utili-zation</u>	<u>Ridership</u>		<u>Utili-zation</u>	<u>Ridership</u>		<u>Utili-zation</u>
						<u>Added</u>	<u>Total</u>		<u>Added</u>	<u>Total</u>		
<b><u>Northeast Screenline</u></b>												
<u>Kearny/Stockton</u>	<u>2,211</u>	<u>3,050</u>	<u>72%</u>	<u>2,245</u>	<u>3,327</u>	<u>67%</u>	<u>3</u>	<u>2,214</u>	<u>73%</u>	<u>2</u>	<u>2,247</u>	<u>68%</u>
<u>Other lines</u>	<u>538</u>	<u>1,141</u>	<u>47%</u>	<u>683</u>	<u>1,078</u>	<u>63%</u>	<u>1</u>	<u>539</u>	<u>47%</u>	<u>1</u>	<u>684</u>	<u>63%</u>
<u>Total</u>	<u>2,749</u>	<u>4,191</u>	<u>66%</u>	<u>2,928</u>	<u>4,405</u>	<u>66%</u>	<u>4</u>	<u>2,753</u>	<u>66%</u>	<u>3</u>	<u>2,931</u>	<u>67%</u>
<b><u>Northwest Screenline</u></b>												
<u>Geary</u>	<u>1,821</u>	<u>2,490</u>	<u>73%</u>	<u>1,964</u>	<u>2,623</u>	<u>75%</u>	<u>2</u>	<u>1,823</u>	<u>73%</u>	<u>1</u>	<u>1,965</u>	<u>75%</u>
<u>California</u>	<u>1,610</u>	<u>2,010</u>	<u>80%</u>	<u>1,322</u>	<u>1,752</u>	<u>75%</u>	<u>1</u>	<u>1,611</u>	<u>80%</u>	<u>1</u>	<u>1,323</u>	<u>76%</u>
<u>Sutter/Clement</u>	<u>480</u>	<u>630</u>	<u>76%</u>	<u>425</u>	<u>630</u>	<u>67%</u>	<u>1</u>	<u>481</u>	<u>76%</u>	<u>1</u>	<u>426</u>	<u>68%</u>
<u>Fulton/Hayes</u>	<u>1,277</u>	<u>1,680</u>	<u>76%</u>	<u>1,184</u>	<u>1,323</u>	<b><u>89%</u></b>	<u>1</u>	<u>1,278</u>	<u>76%</u>	<u>1</u>	<u>1,185</u>	<b><u>90%</u></b>
<u>Balboa</u>	<u>758</u>	<u>1,019</u>	<u>74%</u>	<u>625</u>	<u>974</u>	<u>64%</u>	<u>1</u>	<u>759</u>	<u>74%</u>	<u>1</u>	<u>626</u>	<u>64%</u>
<u>Total</u>	<u>5,946</u>	<u>7,829</u>	<u>76%</u>	<u>5,520</u>	<u>7,302</u>	<u>76%</u>	<u>6</u>	<u>5,952</u>	<u>76%</u>	<u>5</u>	<u>5,526</u>	<u>76%</u>
<b><u>Southeast Screenline</u></b>												
<u>Third Street</u>	<u>359</u>	<u>793</u>	<u>45%</u>	<u>788</u>	<u>793</u>	<b><u>99%</u></b>	<u>26</u>	<u>385</u>	<u>49%</u>	<u>42</u>	<u>830</u>	<b><u>105%</u></b>
<u>Mission</u>	<u>1,643</u>	<u>2,509</u>	<u>65%</u>	<u>1,407</u>	<u>2,601</u>	<u>54%</u>	<u>0</u>	<u>1,643</u>	<u>65%</u>	<u>0</u>	<u>1,407</u>	<u>54%</u>
<u>San Bruno/Bayshore</u>	<u>1,690</u>	<u>2,134</u>	<u>79%</u>	<u>1,536</u>	<u>2,134</u>	<u>72%</u>	<u>3</u>	<u>1,693</u>	<u>79%</u>	<u>5</u>	<u>1,541</u>	<u>72%</u>
<u>Other lines</u>	<u>1,468</u>	<u>1,756</u>	<u>84%</u>	<u>1,085</u>	<u>1,675</u>	<u>65%</u>	<u>7</u>	<u>1,475</u>	<u>84%</u>	<u>10</u>	<u>1,095</u>	<u>65%</u>
<u>Total</u>	<u>5,160</u>	<u>7,192</u>	<u>72%</u>	<u>4,816</u>	<u>7,203</u>	<u>67%</u>	<u>36</u>	<u>5,196</u>	<u>72%</u>	<u>57</u>	<u>4,873</u>	<u>68%</u>
<b><u>Southwest Screenline</u></b>												
<u>Subway lines</u>	<u>6,330</u>	<u>6,205</u>	<b><u>102%</u></b>	<u>4,904</u>	<u>6,164</u>	<u>80%</u>	<u>0</u>	<u>6,330</u>	<b><u>102%</u></b>	<u>0</u>	<u>4,904</u>	<u>80%</u>
<u>Haight/Noriega</u>	<u>1,121</u>	<u>1,554</u>	<u>72%</u>	<u>977</u>	<u>1,554</u>	<u>63%</u>	<u>1</u>	<u>1,122</u>	<u>72%</u>	<u>1</u>	<u>978</u>	<u>63%</u>
<u>Other lines</u>	<u>465</u>	<u>700</u>	<u>66%</u>	<u>555</u>	<u>700</u>	<u>79%</u>	<u>0</u>	<u>465</u>	<u>66%</u>	<u>0</u>	<u>555</u>	<u>79%</u>
<u>Total</u>	<u>7,916</u>	<u>8,459</u>	<b><u>94%</u></b>	<u>6,436</u>	<u>8,418</u>	<u>76%</u>	<u>1</u>	<u>7,917</u>	<b><u>94%</u></b>	<u>1</u>	<u>6,437</u>	<u>76%</u>

Notes:

**Bold** indicates capacity utilization of 85 percent or greater.

<sup>1</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

- \* Table 3.5-17, on p. 3.5-52 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Table 3.5-17: Muni Localized Screenlines—Baseline plus Project Conditions (Proposed Project)**

Direction/Route	Baseline Conditions						Baseline plus Project Conditions (Proposed Project)					
	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Weekday A.M. Peak Hour			Weekday P.M. Peak Hour		
	Rider-ship	Capa-city	Utili-zation	Rider-ship	Capa-city	Utili-zation	Ridership		Utili-zation	Ridership		Utili-zation
						Added	Total		Added	Total		
<b><i>Inbound to Project Site<sup>1</sup></i></b>												
19 Polk (LMLP)	29	252	12%	69	252	27%	63	92	37%	106	175	69%
19 Polk (GMLP)	160	252	64%	170	252	67%	4	164	65%	6	176	70%
44 O'Shaughnessy (GMLP)	304	473	64%	377	420	<b>90%</b>	52	355	75%	88	467	<b>111%</b>
<b><i>Outbound from Project Site<sup>2</sup></i></b>												
19 Polk (LMLP)	109	252	43%	64	252	25%	67	176	70%	57	121	48%
19 Polk (GMLP)	190	252	75%	181	252	72%	5	195	77%	4	185	73%
44 O'Shaughnessy (GMLP)	385	473	81%	248	420	59%	49	433	<b>92%</b>	42	291	69%

Notes:

GMLP = global maximum load point; LMLP = local maximum load point; MLP = maximum load point; Muni = San Francisco Municipal Railway

**Bold** indicates capacity utilization of 85 percent or greater.

<sup>1</sup> Corresponds to the “outbound” direction for these routes, as defined by Muni.

<sup>2</sup> Corresponds to the “inbound” direction for these routes, as defined by Muni.

Source: San Francisco, 2017.

(Revised) **Table 3.5-17: Muni Localized Screenlines—Baseline plus Project Conditions (Proposed Project)**

Direction/Route	Baseline Conditions						Baseline plus Project Conditions (Proposed Project)					
	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Weekday A.M. Peak Hour			Weekday P.M. Peak Hour		
	Rider-ship	Capa-city	Utili-zation	Rider-ship	Capa-city	Utili-zation	Ridership		Utili-zation	Ridership		Utili-zation
						Added	Total		Added	Total		
<b><i>Inbound to Project Site<sup>1</sup></i></b>												
19 Polk (LMLP)	29	252	12%	69	252	27%	55	84	33%	126	195	77%
19 Polk (GMLP)	160	252	64%	170	252	67%	3	163	65%	7	177	70%
44 O'Shaughnessy (GMLP)	304	473	64%	377	420	<b>90%</b>	45	349	74%	105	482	<b>115%</b>
<b><i>Outbound from Project Site<sup>2</sup></i></b>												
19 Polk (LMLP)	109	252	43%	64	252	25%	80	189	75%	49	113	45%
19 Polk (GMLP)	190	252	75%	181	252	72%	6	195	78%	3	184	73%
44 O'Shaughnessy (GMLP)	385	473	81%	248	420	59%	58	443	<b>94%</b>	36	284	68%

Notes:

GMLP = global maximum load point; LMLP = local maximum load point; MLP = maximum load point; Muni = San Francisco Municipal Railway

**Bold** indicates capacity utilization of 85 percent or greater.

<sup>1</sup> Corresponds to the “outbound” direction for these routes, as defined by Muni.

<sup>2</sup> Corresponds to the “inbound” direction for these routes, as defined by Muni.

Source: San Francisco, 2017.

\* Table 3.5-18, on p. 3.5-56 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Table 3.5-18: Regional Transit Screenlines—Baseline plus Project Conditions (Proposed Project)**

Screenline	Baseline Conditions						Baseline plus Project Conditions (Proposed Project)					
	Weekday A.M. Peak Hour <sup>†</sup>			Weekday P.M. Peak Hour <sup>†</sup>			Weekday A.M. Peak Hour <sup>†</sup>			Weekday P.M. Peak Hour <sup>†</sup>		
	Rider-ship	Capacity	Utili-zation	Rider-ship	Capacity	Utili-zation	Ridership Added	Total	Utili-zation	Ridership Added	Total	Utili-zation
<i>East Bay Screenline</i>												
BART	25,400	23,256	<b>109%</b>	24,490	22,784	<b>107%</b>	10	25,410	<b>109%</b>	9	24,499	<b>108%</b>
AC Transit	1,568	2,829	55%	2,256	3,926	57%	0	1,568	55%	0	2,256	57%
Ferries	810	1,170	69%	805	1,615	50%	0	810	69%	0	805	50%
<i>Screenline Subtotal</i>	<i>27,778</i>	<i>27,255</i>	<i><b>102%</b></i>	<i>27,551</i>	<i>28,325</i>	<i>97%</i>	<i>10</i>	<i>27,788</i>	<i><b>102%</b></i>	<i>9</i>	<i>27,560</i>	<i>97%</i>
<i>North Bay Screenline</i>												
GGT Buses	1,330	2,543	52%	1,384	2,817	49%	1	1,331	52%	1	1,385	49%
Ferries	1,082	1,959	55%	968	1,959	49%	0	1,082	55%	0	968	49%
<i>Screenline Subtotal</i>	<i>2,412</i>	<i>4,502</i>	<i>54%</i>	<i>2,352</i>	<i>4,776</i>	<i>49%</i>	<i>1</i>	<i>2,413</i>	<i>54%</i>	<i>1</i>	<i>2,353</i>	<i>49%</i>
<i>South Bay Screenline</i>												
BART	14,151	19,367	73%	13,502	18,900	71%	10	14,161	73%	9	13,511	71%
Caltrain	2,173	3,100	70%	2,381	3,100	77%	23	2,196	71%	21	2,404	78%
SamTrans	255	520	49%	141	320	44%	0	255	49%	0	141	44%
<i>Screenline Subtotal</i>	<i>16,579</i>	<i>22,987</i>	<i>72%</i>	<i>16,024</i>	<i>22,320</i>	<i>72%</i>	<i>33</i>	<i>16,612</i>	<i>72%</i>	<i>30</i>	<i>16,054</i>	<i>72%</i>
<i>Total</i>	<i>46,769</i>	<i>54,744</i>	<i>85%</i>	<i>45,927</i>	<i>55,421</i>	<i>83%</i>	<i>44</i>	<i>46,813</i>	<i>86%</i>	<i>40</i>	<i>45,967</i>	<i>83%</i>

Notes:

AC Transit = Alameda-Contra Costa County Transit District; BART = Bay Area Rapid Transit; GGT = Golden Gate Transit; SamTrans = San Mateo County Transit District

**Bold** indicates capacity utilization of 100 percent or greater.

<sup>†</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

(Revised) **Table 3.5-18: Regional Transit Screenlines—Baseline plus Project Conditions (Proposed Project)**

Screenline	Baseline Conditions						Baseline plus Project Conditions (Proposed Project)					
	Weekday A.M. Peak Hour <sup>1</sup>			Weekday P.M. Peak Hour <sup>1</sup>			Weekday A.M. Peak Hour <sup>1</sup>			Weekday P.M. Peak Hour <sup>1</sup>		
	Rider- ship	Capa- city	Utili- zation	Rider- ship	Capa- city	Utili- zation	Ridership Added	Total	Utili- zation	Ridership Added	Total	Utili- zation
<b><u>East Bay Screenline</u></b>												
BART	25,400	23,256	<b>109%</b>	24,490	22,784	<b>107%</b>	10	25,410	<b>109%</b>	8	24,498	<b>108%</b>
AC Transit	1,568	2,829	55%	2,256	3,926	57%	0	1,568	55%	0	2,256	57%
Ferries	810	1,170	69%	805	1,615	50%	0	810	69%	0	805	50%
<i>Screenline Subtotal</i>	<i>27,778</i>	<i>27,255</i>	<i><b>102%</b></i>	<i>27,551</i>	<i>28,325</i>	<i>97%</i>	<i>10</i>	<i>27,788</i>	<i><b>102%</b></i>	<i>8</i>	<i>27,559</i>	<i>97%</i>
<b><u>North Bay Screenline</u></b>												
GGT Buses	1,330	2,543	52%	1,384	2,817	49%	1	1,331	52%	1	1,385	49%
Ferries	1,082	1,959	55%	968	1,959	49%	0	1,082	55%	0	968	49%
<i>Screenline Subtotal</i>	<i>2,412</i>	<i>4,502</i>	<i>54%</i>	<i>2,352</i>	<i>4,776</i>	<i>49%</i>	<i>1</i>	<i>2,413</i>	<i>54%</i>	<i>1</i>	<i>2,353</i>	<i>49%</i>
<b><u>South Bay Screenline</u></b>												
BART	14,151	19,367	73%	13,502	18,900	71%	9	14,160	73%	8	13,510	71%
Caltrain	2,173	3,100	70%	2,381	3,100	77%	21	2,194	71%	18	2,399	77%
SamTrans	255	520	49%	141	320	44%	0	255	49%	0	141	44%
<i>Screenline Subtotal</i>	<i>16,579</i>	<i>22,987</i>	<i>72%</i>	<i>16,024</i>	<i>22,320</i>	<i>72%</i>	<i>30</i>	<i>16,609</i>	<i>72%</i>	<i>26</i>	<i>16,050</i>	<i>72%</i>
<b><i>Total</i></b>	<b><i>46,769</i></b>	<b><i>54,744</i></b>	<b><i>85%</i></b>	<b><i>45,927</i></b>	<b><i>55,421</i></b>	<b><i>83%</i></b>	<b><i>41</i></b>	<b><i>46,810</i></b>	<b><i>86%</i></b>	<b><i>35</i></b>	<b><i>45,962</i></b>	<b><i>83%</i></b>

Notes:

AC Transit = Alameda–Contra Costa County Transit District; BART = Bay Area Rapid Transit; GGT = Golden Gate Transit; SamTrans = San Mateo County Transit District

**Bold** indicates capacity utilization of 100 percent or greater.

<sup>1</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

- \* Table 3.5-22, on p. 3.5-64 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

(Revised) **Table 3.5-22: Transit Delay Impacts—Baseline plus Project Conditions**

Delay (seconds)	Proposed Project				Variant			
	Weekday A.M. Peak Hour		Weekday P.M. Peak Hour		Weekday A.M. Peak Hour		Weekday P.M. Peak Hour	
	19P	44O	19P	44O	19P	44O	19P	44O
Added intersection delay	22	15	31	14	45	18	9	27
Added dwell time	65	27	82	40	123	54	143	66
Total	86	42	113	54	168	72	192	93
Significance threshold	450	240	450	270	450	240	450	270

Notes:

19P = 19 Polk; 44O = 44 O'Shaughnessy

Travel delays shown represent the sum across the eastbound and westbound directions of the corridor, as the significance threshold is based on round-trip travel time.

The revised proposed project would generate fewer vehicle trips and result in a similar number of transit trips than analyzed for the proposed project in the AM and PM peak hours, causing similar or less severe increases to traffic congestion at nearby intersections and resulting in a similar increase in bus dwell time for loading and unloading passengers. The combination of congestion delay plus the boarding/alighting delay for the revised proposed project would result in an increase in transit delay similar to that presented in this table.

Source: San Francisco, 2017.

- \* Table 3.5-23 and the preceding text, on p. 3.5-65 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

Both the proposed project and the variant are expected to increase bicycle activity in the area. The proposed project would generate approximately ~~101~~102 and ~~103~~106 bicycle trips, respectively, during the weekday a.m. and weekday p.m. peak hours. The variant would generate approximately 138 and 131 bicycle trips, respectively, during the weekday a.m. and weekday p.m. peak hours.

**Table 3.5-23: Bicycle Parking Requirements**

Land Use	Proposed Project		Variant	
	Class 1 Spaces	Class 2 Spaces	Class 1 Spaces	Class 2 Spaces
Dwelling Units <sup>1</sup>	1,240	62	500	25
Office	35	6	172	20
Retail (including supermarket) <sup>2</sup>	9	27	13	60
Restaurant	5	47	6	60
School <sup>3</sup>	80	20	80	20
Open Space	–	–	–	–
<b>Total</b>	<b>1,369</b>	<b>162</b>	<b>771</b>	<b>185</b>

## Notes:

<sup>1</sup> The Class 1 bicycle parking requirement for dwelling units decreases in buildings with more than 100 units. This calculation conservatively assumes that no single building in the development would have more than 100 dwelling units.

<sup>2</sup> The Class 2 bicycle parking requirement for retail decreases in buildings with more than 50,000 square feet. This calculation conservatively assumes that no single building in the development would have more than 50,000 square feet of retail use.

<sup>3</sup> The San Francisco Planning Code specifies different requirements for elementary schools and for secondary schools. The analysis assumes that 67 percent of the 20 classrooms are for elementary school (grades kindergarten through 5th grade) and the remaining 33 percent of the classrooms are for secondary school (grades 6–8).

Source: San Francisco, 2017.

(Revised) **Table 3.5-23: Bicycle Parking Requirements**

Land Use	Proposed Project		Variant	
	Class 1 Spaces	Class 2 Spaces	Class 1 Spaces	Class 2 Spaces
<u>Dwelling Units<sup>1</sup></u>	<u>1,575</u>	<u>79</u>	<u>500</u>	<u>25</u>
<u>Office</u>	<u>25</u>	<u>5</u>	<u>172</u>	<u>20</u>
<u>Retail (including supermarket)<sup>2</sup></u>	<u>8</u>	<u>23</u>	<u>13</u>	<u>60</u>
<u>Restaurant</u>	<u>5</u>	<u>41</u>	<u>6</u>	<u>60</u>
<u>School</u>	<u>0</u>	<u>0</u>	<u>80</u>	<u>20</u>
<u>Open Space</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>Total</u>	<u>1,613</u>	<u>148</u>	<u>771</u>	<u>185</u>

## Notes:

<sup>1</sup> The Class 1 bicycle parking requirement for dwelling units decreases in buildings with more than 100 units. This calculation conservatively assumes that no single building in the development would have more than 100 dwelling units.

<sup>2</sup> The Class 2 bicycle parking requirement for retail decreases in buildings with more than 50,000 square feet. This calculation conservatively assumes that no single building in the development would have more than 50,000 square feet of retail use.

Source: San Francisco, 2017.

- \* Table 3.5-25 and the preceding text, on pp. 3.5-80–3.5-81 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

The proposed project would generate peak demands for 2,5532,582 and 2,4392,683 spaces, respectively, during the weekday midday and weekday evening periods (Table 3.5-1425). The variant would generate

peak demands for 3,624 and 1,800 spaces, respectively, during the weekday midday and weekday evening periods (Table 3.5-1425).

**Table 3.5-25: Parking Supply and Demand**

Scenario	Existing				Proposed		Estimated Peak Demand		Net Surplus (+) or Shortfall (-)	
	Midday		Evening		Off-Street Supply	Change in On-Street Supply	Midday	Evening	Midday	Evening
	Off-Street Surplus	On-Street Surplus	Off-Street Surplus	On-Street Surplus						
Proposed Project	0	345	0	369	1,800	-104	2,553	2,439	-512	-374
Variant					1,912		3,624	1,800	-1,471	377

Source: San Francisco, 2017.

(Revised) **Table 3.5-25: Parking Supply and Demand**

Scenario	Existing				Proposed		Estimated Peak Demand		Net Surplus (+) or Shortfall (-)	
	Midday		Evening		Off-Street Supply	Change in On-Street Supply	Midday	Evening	Midday	Evening
	Off-Street Surplus	On-Street Surplus	Off-Street Surplus	On-Street Surplus						
Proposed Project	0	345	0	369	1,800	-104	2,582	2,683	-541	-618
Variant					1,912		3,624	1,800	-1,471	377

Source: San Francisco, 2017.

\* Table 3.5-28, on p. 3.5-89 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:



**Table 3.5-28: Muni Downtown Screenlines—Cumulative Conditions (Proposed Project)**

Screenline	Weekday A.M. Peak Hour <sup>†</sup>					Weekday P.M. Peak Hour <sup>†</sup>				
	Rider- ship	Capa- city	Utili- zation	Proposed Project		Rider- ship	Capa- city	Utili- zation	Proposed Project	
				Added Trips	Contri- bution				Added Trips	Contri- bution
<b><i>Northeast Screenline</i></b>										
Kearny/Stockton	7,394	9,473	78%	4	0.1%	6,295	8,329	76%	6	0.1%
Other lines	758	1,785	42%	2	0.3%	1,229	2,065	60%	2	0.2%
<i>Subtotal</i>	<i>8,152</i>	<i>11,258</i>	<i>72%</i>	<i>6</i>	<i>0.1%</i>	<i>7,524</i>	<i>10,394</i>	<i>72%</i>	<i>8</i>	<i>0.1%</i>
<b><i>Northwest Screenline</i></b>										
Geary	2,673	3,763	71%	3	0.1%	2,996	3,621	83%	4	0.1%
California	1,989	2,306	<b>86%</b>	3	0.2%	2,766	2,021	<b>137%</b>	3	0.1%
Sutter/Clement	581	756	77%	3	0.5%	749	756	<b>99%</b>	3	0.4%
Fulton/Hayes	1,962	1,977	<b>99%</b>	2	0.1%	2,762	1,878	<b>147%</b>	2	0.1%
Balboa	690	1,008	68%	2	0.3%	776	974	80%	2	0.3%
<i>Subtotal</i>	<i>7,895</i>	<i>9,810</i>	<i>80%</i>	<i>13</i>	<i>0.2%</i>	<i>8,049</i>	<i>9,250</i>	<i>87%</i>	<i>14</i>	<i>0.2%</i>
<b><i>Southeast Screenline</i></b>										
Third Street	2,442	5,712	43%	17	0.7%	2,300	5,712	40%	29	1.3%
Mission	3,117	3,008	<b>104%</b>	0	0.0%	2,673	3,008	<b>89%</b>	0	0.0%
San Bruno/Bayshore	1,952	2,197	<b>89%</b>	5	0.3%	1,817	2,134	<b>85%</b>	8	0.4%
Other lines	1,795	2,027	<b>89%</b>	10	0.6%	1,582	1,927	82%	17	1.1%
<i>Subtotal</i>	<i>9,286</i>	<i>12,944</i>	<i>72%</i>	<i>32</i>	<i>0.4%</i>	<i>8,372</i>	<i>12,781</i>	<i>66%</i>	<i>54</i>	<i>0.6%</i>
<b><i>Southwest Screenline</i></b>										
Subway lines	6,314	7,020	<b>90%</b>	1	0.0%	5,692	6,804	84%	1	0.0%
Haight/Noriega	1,415	1,596	<b>89%</b>	1	0.1%	1,265	1,596	79%	2	0.2%
Other lines	175	560	31%	0	0.0%	380	840	45%	0	0.0%
<i>Subtotal</i>	<i>7,904</i>	<i>9,176</i>	<i>86%</i>	<i>2</i>	<i>0.0%</i>	<i>7,337</i>	<i>9,240</i>	<i>79%</i>	<i>3</i>	<i>0.0%</i>

Notes:

Muni = San Francisco Municipal Railway

**Bold** indicates capacity utilization of 85 percent or greater.<sup>†</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

(Revised) **Table 3.5-28: Muni Downtown Screenlines—Cumulative Conditions (Proposed Project)**

<u>Screenline</u>	<u>Weekday A.M. Peak Hour<sup>1</sup></u>					<u>Weekday P.M. Peak Hour<sup>1</sup></u>				
	<u>Rider-ship</u>	<u>Capa-city</u>	<u>Utili-zation</u>	<u>Proposed Project</u>		<u>Rider-ship</u>	<u>Capa-city</u>	<u>Utili-zation</u>	<u>Proposed Project</u>	
				<u>Added Trips</u>	<u>Contri-bution</u>				<u>Added Trips</u>	<u>Contri-bution</u>
<b><u>Northeast Screenline</u></b>										
<u>Kearny/Stockton</u>	<u>7,394</u>	<u>9,473</u>	<u>78%</u>	<u>4</u>	<u>0.1%</u>	<u>6,295</u>	<u>8,329</u>	<u>76%</u>	<u>5</u>	<u>0.1%</u>
<u>Other lines</u>	<u>758</u>	<u>1,785</u>	<u>42%</u>	<u>2</u>	<u>0.3%</u>	<u>1,229</u>	<u>2,065</u>	<u>60%</u>	<u>2</u>	<u>0.2%</u>
<u>Subtotal</u>	<u>8,152</u>	<u>11,258</u>	<u>72%</u>	<u>6</u>	<u>0.1%</u>	<u>7,524</u>	<u>10,394</u>	<u>72%</u>	<u>7</u>	<u>0.1%</u>
<b><u>Northwest Screenline</u></b>										
<u>Geary</u>	<u>2,673</u>	<u>3,763</u>	<u>71%</u>	<u>3</u>	<u>0.1%</u>	<u>2,996</u>	<u>3,621</u>	<u>83%</u>	<u>4</u>	<u>0.1%</u>
<u>California</u>	<u>1,989</u>	<u>2,306</u>	<b><u>86%</u></b>	<u>3</u>	<u>0.2%</u>	<u>2,766</u>	<u>2,021</u>	<b><u>137%</u></b>	<u>3</u>	<u>0.1%</u>
<u>Sutter/Clement</u>	<u>581</u>	<u>756</u>	<u>77%</u>	<u>3</u>	<u>0.5%</u>	<u>749</u>	<u>756</u>	<b><u>99%</u></b>	<u>3</u>	<u>0.4%</u>
<u>Fulton/Hayes</u>	<u>1,962</u>	<u>1,977</u>	<b><u>99%</u></b>	<u>2</u>	<u>0.1%</u>	<u>2,762</u>	<u>1,878</u>	<b><u>147%</u></b>	<u>2</u>	<u>0.1%</u>
<u>Balboa</u>	<u>690</u>	<u>1,008</u>	<u>68%</u>	<u>2</u>	<u>0.3%</u>	<u>776</u>	<u>974</u>	<u>80%</u>	<u>2</u>	<u>0.3%</u>
<u>Subtotal</u>	<u>7,895</u>	<u>9,810</u>	<u>80%</u>	<u>13</u>	<u>0.2%</u>	<u>8,049</u>	<u>9,250</u>	<b><u>87%</u></b>	<u>14</u>	<u>0.2%</u>
<b><u>Southeast Screenline</u></b>										
<u>Third Street</u>	<u>2,442</u>	<u>5,712</u>	<u>43%</u>	<u>21</u>	<u>0.9%</u>	<u>2,300</u>	<u>5,712</u>	<u>40%</u>	<u>34</u>	<u>1.5%</u>
<u>Mission</u>	<u>3,117</u>	<u>3,008</u>	<b><u>104%</u></b>	<u>0</u>	<u>0.0%</u>	<u>2,673</u>	<u>3,008</u>	<b><u>89%</u></b>	<u>0</u>	<u>0.0%</u>
<u>San Bruno/Bayshore</u>	<u>1,952</u>	<u>2,197</u>	<b><u>89%</u></b>	<u>5</u>	<u>0.3%</u>	<u>1,817</u>	<u>2,134</u>	<b><u>85%</u></b>	<u>9</u>	<u>0.5%</u>
<u>Other lines</u>	<u>1,795</u>	<u>2,027</u>	<b><u>89%</u></b>	<u>11</u>	<u>0.6%</u>	<u>1,582</u>	<u>1,927</u>	<u>82%</u>	<u>19</u>	<u>1.2%</u>
<u>Subtotal</u>	<u>9,286</u>	<u>12,944</u>	<u>72%</u>	<u>37</u>	<u>0.4%</u>	<u>8,372</u>	<u>12,781</u>	<u>66%</u>	<u>62</u>	<u>0.7%</u>
<b><u>Southwest Screenline</u></b>										
<u>Subway lines</u>	<u>6,314</u>	<u>7,020</u>	<b><u>90%</u></b>	<u>1</u>	<u>0.0%</u>	<u>5,692</u>	<u>6,804</u>	<u>84%</u>	<u>1</u>	<u>0.0%</u>
<u>Haight/Noriega</u>	<u>1,415</u>	<u>1,596</u>	<b><u>89%</u></b>	<u>1</u>	<u>0.1%</u>	<u>1,265</u>	<u>1,596</u>	<u>79%</u>	<u>2</u>	<u>0.2%</u>
<u>Other lines</u>	<u>175</u>	<u>560</u>	<u>31%</u>	<u>0</u>	<u>0.0%</u>	<u>380</u>	<u>840</u>	<u>45%</u>	<u>0</u>	<u>0.0%</u>
<u>Subtotal</u>	<u>7,904</u>	<u>9,176</u>	<b><u>86%</u></b>	<u>2</u>	<u>0.0%</u>	<u>7,337</u>	<u>9,240</u>	<u>79%</u>	<u>3</u>	<u>0.0%</u>

Notes:

Muni = San Francisco Municipal Railway

**Bold** indicates capacity utilization of 85 percent or greater.

<sup>1</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

- \* Table 3.5-29, on p. 3.5-90 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Table 3.5-29: Project-Specific Cordon—Cumulative Conditions (Proposed Project)**

Direction or Route	Weekday A.M. Peak Hour					Weekday P.M. Peak Hour				
	Rider-ship	Capacity	Utilization	Proposed Project		Rider-ship	Capacity	Utilization	Proposed Project	
				Added Trips	Contribution				Added Trips	Contribution
44 and 48 (westbound)	646	1,016	64%	52	8.1%	611	1,016	60%	76	12.4%
44 and 48 (eastbound)	515	1,016	51%	96	18.6%	684	1,016	67%	86	12.6%
HPX <sup>1</sup>	128	270	49%	25	19.5%	181	270	67%	41	22.6%

Notes:

HPX = Hunters Point Express

<sup>1</sup> HPX is evaluated only for the peak direction during each peak hour (inbound toward downtown during the weekday a.m. peak hour and outbound away from downtown during the weekday p.m. peak hour).

Source: San Francisco, 2017.

(Revised) **Table 3.5-29: Project-Specific Cordon—Cumulative Conditions (Proposed Project)**

Direction or Route	Weekday A.M. Peak Hour					Weekday P.M. Peak Hour				
	Rider-ship	Capacity	Utilization	Proposed Project		Rider-ship	Capacity	Utilization	Proposed Project	
				Added Trips	Contribution				Added Trips	Contribution
44 and 48 (westbound)	654	1,016	64%	60	9.2%	593	1,016	58%	58	9.8%
44 and 48 (eastbound)	469	1,016	46%	50	10.7%	696	1,016	69%	98	14.1%
HPX <sup>1</sup>	132	270	49%	29	21.9%	187	270	69%	47	25.1%

Notes:

HPX = Hunters Point Express

<sup>1</sup> HPX is evaluated only for the peak direction during each peak hour (inbound toward downtown during the weekday a.m. peak hour and outbound away from downtown during the weekday p.m. peak hour).

Source: San Francisco, 2017.

- \* Table 3.5-30, on p. 3.5-91 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Table 3.5-30: Regional Transit Screenlines—Cumulative Conditions (Proposed Project)**

Screenline	Weekday A.M. Peak Hour <sup>†</sup>					Weekday P.M. Peak Hour <sup>†</sup>				
	Rider-ship	Capa-city	Utili-zation	Proposed Project		Rider-ship	Capa-city	Utili-zation	Proposed Project	
				Added Trips	Contri-bution				Added Trips	Contri-bution
<b><i>East Bay Screenline</i></b>										
BART	38,000	32,100	<b>118.4%</b>	20	0.1%	36,000	32,100	<b>112.1%</b>	24	0.1%
AC Transit	7,000	12,000	58.3%	0	0.0%	7,000	12,000	58.3%	0	0.0%
Ferries	4,682	5,940	78.8%	0	0.0%	5,319	5,940	89.5%	0	0.0%
<i>Screenline Subtotal</i>	<i>49,682</i>	<i>50,040</i>	<i>99.3%</i>	<i>20</i>	<i>0.0%</i>	<i>48,319</i>	<i>50,040</i>	<i>96.6%</i>	<i>24</i>	<i>0.1%</i>
<b><i>North Bay Screenline</i></b>										
Golden Gate Transit Buses	1,990	2,543	78.3%	2	0.1%	2,070	2,817	73.5%	3	0.1%
Ferries	1,619	1,959	82.6%	1	0.1%	1,619	1,959	82.6%	1	0.1%
<i>Screenline Subtotal</i>	<i>3,609</i>	<i>4,502</i>	<i>80.2%</i>	<i>3</i>	<i>0.1%</i>	<i>3,689</i>	<i>4,776</i>	<i>77.2%</i>	<i>4</i>	<i>0.1%</i>
<b><i>South Bay Screenline</i></b>										
BART	21,000	28,808	72.9%	23	0.2%	20,000	28,808	69.4%	24	0.2%
Caltrain	2,310	3,600	64.2%	53	2.3%	2,529	3,600	70.3%	56	2.2%
SamTrans	271	520	52.1%	0	0.0%	150	320	46.9%	0	0.0%
Ferries	59	200	29.5%	0	0.0%	59	200	29.5%	0	0.0%
<i>Screenline Subtotal</i>	<i>23,640</i>	<i>33,128</i>	<i>71.4%</i>	<i>76</i>	<i>0.3%</i>	<i>22,738</i>	<i>32,928</i>	<i>69.1%</i>	<i>80</i>	<i>0.5%</i>
<b><i>Total</i></b>	<b><i>76,931</i></b>	<b><i>87,670</i></b>	<b><i>87.8%</i></b>	<b><i>99</i></b>	<b><i>0.1%</i></b>	<b><i>74,746</i></b>	<b><i>87,744</i></b>	<b><i>85.2%</i></b>	<b><i>108</i></b>	<b><i>0.2%</i></b>

Notes:

AC Transit = Alameda-Contra Costa County Transit District; BART = Bay Area Rapid Transit; SamTrans = San Mateo County Transit District

**Bold** indicates capacity utilization of 100 percent or greater.

<sup>†</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

(Revised) **Table 3.5-30: Regional Transit Screenlines—Cumulative Conditions (Proposed Project)**

<u>Screenline</u>	<u>Weekday A.M. Peak Hour<sup>1</sup></u>					<u>Weekday P.M. Peak Hour<sup>1</sup></u>				
	<u>Rider-ship</u>	<u>Capacity</u>	<u>Utilization</u>	<u>Proposed Project</u>		<u>Rider-ship</u>	<u>Capacity</u>	<u>Utilization</u>	<u>Proposed Project</u>	
				<u>Added Trips</u>	<u>Contribution</u>				<u>Added Trips</u>	<u>Contribution</u>
<b><u>East Bay Screenline</u></b>										
<u>BART</u>	<u>38,000</u>	<u>32,100</u>	<b><u>118.4%</u></b>	<u>20</u>	<u>0.1%</u>	<u>36,000</u>	<u>32,100</u>	<b><u>112.1%</u></b>	<u>23</u>	<u>0.1%</u>
<u>AC Transit</u>	<u>7,000</u>	<u>12,000</u>	<u>58.3%</u>	<u>0</u>	<u>0.0%</u>	<u>7,000</u>	<u>12,000</u>	<u>58.3%</u>	<u>0</u>	<u>0.0%</u>
<u>Ferries</u>	<u>4,682</u>	<u>5,940</u>	<u>78.8%</u>	<u>0</u>	<u>0.0%</u>	<u>5,319</u>	<u>5,940</u>	<u>89.5%</u>	<u>0</u>	<u>0.0%</u>
<u>Screenline Subtotal</u>	<u>49,682</u>	<u>50,040</u>	<u>99.3%</u>	<u>20</u>	<u>0.0%</u>	<u>48,319</u>	<u>50,040</u>	<u>96.6%</u>	<u>23</u>	<u>0.1%</u>
<b><u>North Bay Screenline</u></b>										
<u>Golden Gate Transit Buses</u>	<u>1,990</u>	<u>2,543</u>	<u>78.3%</u>	<u>2</u>	<u>0.1%</u>	<u>2,070</u>	<u>2,817</u>	<u>73.5%</u>	<u>3</u>	<u>0.1%</u>
<u>Ferries</u>	<u>1,619</u>	<u>1,959</u>	<u>82.6%</u>	<u>1</u>	<u>0.1%</u>	<u>1,619</u>	<u>1,959</u>	<u>82.6%</u>	<u>1</u>	<u>0.1%</u>
<u>Screenline Subtotal</u>	<u>3,609</u>	<u>4,502</u>	<u>80.2%</u>	<u>3</u>	<u>0.1%</u>	<u>3,689</u>	<u>4,776</u>	<u>77.2%</u>	<u>4</u>	<u>0.1%</u>
<b><u>South Bay Screenline</u></b>										
<u>BART</u>	<u>21,000</u>	<u>28,808</u>	<u>72.9%</u>	<u>19</u>	<u>0.2%</u>	<u>20,000</u>	<u>28,808</u>	<u>69.4%</u>	<u>22</u>	<u>0.2%</u>
<u>Caltrain</u>	<u>2,310</u>	<u>3,600</u>	<u>64.2%</u>	<u>44</u>	<u>2.0%</u>	<u>2,529</u>	<u>3,600</u>	<u>70.3%</u>	<u>51</u>	<u>2.0%</u>
<u>SamTrans</u>	<u>271</u>	<u>520</u>	<u>52.1%</u>	<u>0</u>	<u>0.0%</u>	<u>150</u>	<u>320</u>	<u>46.9%</u>	<u>0</u>	<u>0.0%</u>
<u>Ferries</u>	<u>59</u>	<u>200</u>	<u>29.5%</u>	<u>0</u>	<u>0.0%</u>	<u>59</u>	<u>200</u>	<u>29.5%</u>	<u>0</u>	<u>0.0%</u>
<u>Screenline Subtotal</u>	<u>23,640</u>	<u>33,128</u>	<u>71.4%</u>	<u>63</u>	<u>0.3%</u>	<u>22,738</u>	<u>32,928</u>	<u>69.1%</u>	<u>73</u>	<u>0.5%</u>
<u>Total</u>	<u>76,931</u>	<u>87,670</u>	<u>87.8%</u>	<u>86</u>	<u>0.1%</u>	<u>74,746</u>	<u>87,744</u>	<u>85.2%</u>	<u>100</u>	<u>0.2%</u>

Notes:

AC Transit = Alameda–Contra Costa County Transit District; BART = Bay Area Rapid Transit; SamTrans = San Mateo County Transit District

**Bold** indicates capacity utilization of 100 percent or greater.

<sup>1</sup> Shows the a.m. peak hour as inbound (i.e., toward downtown) only and the p.m. peak hour as outbound (i.e., away from downtown) only.

Source: San Francisco, 2017.

- \* The revised proposed project would not include a school. Therefore, the impact statement Impact TR-8 on p. 3.5-75 in the Draft EIR is revised as follows to reflect that it is only applicable to the project variant.

**Impact TR-8: Under either the proposed project or variant, passenger loading demand associated with the school during the peak hour of loading activities would not be accommodated within proposed on-site passenger loading facilities or within convenient on-street loading zones, and would create potentially hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit. (Less than Significant with Mitigation)**

- \* In addition, the second paragraph after the impact statement and the mitigation measure language would be revised as follows to reflect that this impact and mitigation are only applicable to the variant.

The school proposed in the variant would generate a high level of passenger loading activity during its peak (much higher than any of the other proposed uses because of the limited time periods for drop-off and pick-up activities) and the design of the proposed passenger loading zone is not yet finalized.

Therefore, impacts related to passenger loading activities generated by the school under the variant would

be significant. Mitigation Measure M-TR-8V, however, would reduce these impacts to less than significant.

**Mitigation Measure M-TR-8V: Implement Passenger Loading Strategies for the School (Variant)**

*Once school enrollment reaches 22 students, the school proposed for the 700 Innes property under the variant shall provide and enforce a pick-up/drop-off plan subject to review and approval by SFMTA to minimize disruptions to traffic, bicycle, and pedestrian circulation associated with school pick-up/drop-off activities and ensure safety for all modes. This plan shall include elements such as the size and location of loading zone(s), parking monitors, staggered drop-offs, a number system for cars, one-way circulation, encouragement of carpools/ride-sharing, and a safety education program. The safety education program shall be targeted at school students, guardians, and staff, as well as residents and businesses near the school site.*

*Informational materials targeted to guardians and nearby residents and employees shall focus on the importance of vehicular safety, locations of school crossings, and school zone speed limits and hours.*

Implementing Mitigation Measure M-TR-8V would reduce the impact of passenger loading activities associated with the school under ~~either the proposed project or~~ variant to *less than significant with mitigation*.

- \* The following new reference has also been added to Draft EIR p. 3.15-100:

San Francisco, City and County of (San Francisco). 2018 (June). *Supplemental Memorandum to the India Basin TIS: Transportation Impacts for the “Revised Proposed Project”*. San Francisco, CA. Case Number: 2014.2541E. Prepared for San Francisco Planning Department by Fehr & Peers, San Francisco, CA.

**Section 3.6, “Noise”**

- \* The following staff-initiated text changes have been made to the second paragraph on p. 3.6-4 in the Draft EIR, under the heading, “Health Effects of Environmental Noise”.

The WHO criteria suggest that when a bedroom window is slightly open (a 15-dB reduction from outside to inside noise levels), exterior continuous (ambient) nighttime noise levels in residential areas should be 45 dBA Leq or below, particularly in areas with older housing stock, and that short-term events should not generate noise exceeding 60 dBA (~~Harris, 1997; Wyle Laboratories, 1994; OPR, 2003~~ WHO, 1999). An acoustically well-insulated building with windows and doors closed can provide 30–35 dB of noise attenuation. (Wyle Laboratories, 2003). More conventional residential construction provides 20–25 dB of noise reduction with windows closed and only about 15 dB of noise reduction when windows are open (OPR, 2003).

Two additional bullets have been added to the bullet list preceding the first full paragraph on p. 3.6-6 in the Draft EIR, under the heading “Existing Noise-Sensitive Land Uses.”

- the residential building at 911 Innes Avenue, which is identified as a historic resource on the San Francisco Property Information Map;<sup>72</sup> and
- the commercial building at 881 Innes Avenue (Hunters Point Springs and Albion Brewery), which was determined to be eligible for listing in the National Register of Historic Places.<sup>73</sup>

With respect to Impact NO-3, and as appearing on p. S-27 of the Draft EIR, the “Significant and Unavoidable with Mitigation” entry under the CEQA Impacts after Mitigation Measure(s) column of Table S-2 for Impact NO-3 is incorrect and inconsistent with the “Less Than Significant with Mitigation” impact statement appearing on p. 3.6-28 of the Draft EIR. The analysis of on-site stationary operational noise impacts for the 900 Innes, India Basin Open Space, and 700 Innes properties appearing in the Draft EIR Section 3.6, “Noise,” on pp. 3.6-28–3.6-30 supports this overall finding of less than significant with mitigation. In response to this comment, the text in Draft EIR Table S-2 under the CEQA Impacts after Mitigation Measure(s) column for Impact NO-3 (Draft EIR p. S-27) has been revised as follows:

~~Significant and Unavoidable with Mitigation~~ Less than Significant with Mitigation

- \* Text in the third paragraph under the heading, “On-Site Construction Noise,” on p. 3.6-20 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

Construction noise impacts on nearby noise-sensitive receptors under either the proposed project or the variant would be a function of the noise generated by construction equipment, equipment locations, the timing and duration of noise-generating construction activities, and distance to the receptors. To be conservative, this analysis assumes that the equipment locations are as close to the studied receptor as the nearest project construction boundary. The proposed project or variant would involve constructing infrastructure (on-site roads, utilities, and trails), buildings (residential, and commercial, ~~and school~~ buildings), and shoreline improvements and in-water features (a pier). The variant would also involve construction of a school building. Noise levels under the proposed project and the variant would be similar, because the two construction scenarios would use similar equipment.

- \* The following reference on p. 3.6-47 of the Draft EIR has been removed, as follows:

~~Harris, D. A. 1997. *Noise Control Manual for Residential Buildings*. New York: McGraw Hill Professional.~~

- \* The following reference on p. 3.6-47 of the Draft EIR has been replaced, as follows:

~~Wyle Laboratories. 1994 (September 30). *Raleigh-Durham International Airport New Construction Acoustical Design Guide*. Wyle Research Report WR 94-23. Arlington, VA. Prepared for Raleigh-Durham Airport Authority, RDU Airport, NC.~~

<sup>72</sup> Page & Turnbull, *India Basin Project Historic Resource Evaluation Parts 1 and 2*, 2017.

<sup>73</sup> Page & Turnbull, *India Basin Project Historic Resource Evaluation Parts 1 and 2*, 2017.

Wyle Laboratories. 2003 (March). *New Construction Acoustical Design Guide*. Wyle Research Report WR 03-10. Arlington, VA. Prepared for City of High Point, High Point, NC.

### **Section 3.7, “Air Quality”**

- \* The following staff-initiated text changes have been made to Mitigation Measure M-AQ-1f of the Draft EIR, pp. 3.7-50–3.7-53, to clarify the timing for the mitigation measure:

#### **Mitigation Measure M-AQ-1f: Prepare and Implement Transportation Demand Management**

*To reduce operational mobile source emissions, the project sponsors shall prepare and implement a transportation demand management (TDM) plan. The TDM plan shall have a goal of reducing estimated aggregate daily one-way vehicle trips associated with the 700 Innes and India Basin Open Space properties by at least 15 percent compared to the aggregate daily one-way vehicle trips identified in the project-related Transportation Impact Study dated July 2017 and the Supplement to the Transportation Impact Study, dated April 27, 2018 (together, the “Final Transportation Impact Study) and included in EIR Appendix F D as calculated before the imposition of TDM measures.*

*~~The project sponsors shall prepare and implement a transportation demand management (TDM) plan. The TDM plan shall have a goal of reducing estimated aggregate daily one-way vehicle trips by at least 15 percent compared to the aggregate daily one-way vehicle trips identified in the project-related Transportation Impact Study dated July 2017 and included in EIR Appendix F.~~*

*To ensure that this reduction goal could be reasonably achieved, the project sponsors shall have a TDM plan ~~will have a monitoring~~ with a goal of reducing ~~by 15 percent~~ the daily one-way vehicle trips to and from the project site by 15 percent for ~~each~~ all buildings that ~~has~~ have received a certificate of occupancy and that ~~is~~ are at least 75 percent occupied, relative to the aggregate daily one-way vehicle trips anticipated for ~~that~~ those buildings based on the trip generation rates contained within the Final Transportation Impact Study as calculated before the imposition of TDM measures. ~~expected development on that parcel.~~*

*~~To ensure that this reduction goal could be reasonably achieved, the TDM plan will have a monitoring goal of reducing by 15 percent the daily one-way vehicle trips for each building that has received a certificate of occupancy and that is at least 75 percent occupied, relative to the one-way vehicle trips anticipated for that building based on expected development on that parcel. The calculations shall use the trip generation rates contained in the project’s Transportation Impact Study. The calculations shall use the b~~Baseline scenario trip generation rates contained in the Final Transportation Impact Study until the point at which SFMTA provides 1,000 passenger capacity per weekday p.m. peak hour along Innes Avenue, at which point the calculations shall use the Cumulative scenario trip rates in the Final Transportation Impact Study. There shall be a transportation management association that would be responsible for the administration, monitoring, and adjustment of the TDM plan. The project sponsors shall be responsible for monitoring implementation of the TDM plan and proposing adjustments to the plan if its goal is not being achieved, in accordance with the following provisions. The TDM plan may include but is not limited to the types of measures summarized below by way of example. Actual TDM*



measures selected should include those from the City's adopted TDM Program Standards, which describe the scope and applicability of candidate measures in detail and include:

- **Active Transportation:** Streetscape improvements to encourage walking, secure bicycle parking, shower and locker facilities for cyclists, subsidized bikeshare memberships for project occupants, bicycle repair and maintenance services, and other bicycle-related services.
- **Car-Share:** Car-share parking spaces and subsidized memberships for project occupants.
- **Delivery:** Amenities and services to support delivery of goods to project occupants.
- **Family-Oriented Measures:** On-site childcare and other amenities to support the use of sustainable transportation modes by families.
- **High-Occupancy Vehicles:** Carpooling/vanpooling incentives and shuttle bus service.
- **Information and Communications:** Multimodal wayfinding signage, transportation information displays, and tailored transportation marketing services.
- **Land Use:** On-site affordable housing and healthy food retail services in underserved areas.
- **Parking:** Unbundled parking, short-term daily parking, parking cash-out offers, and reduced off-street parking supply.

The TDM plan shall describe each measure, including the degree of implementation (e.g., how long will it be in place, how many tenants or visitors it will benefit, on which locations within the site it will be placed) and the population that each measure is intended to serve (e.g., residential tenants, retail visitors, employees of tenants, visitors). The TDM plan shall commit to monitoring of vehicle trips to and from the project site to determine the plan's effectiveness, as described in "TDM Plan Monitoring and Reporting" below. The TDM plan shall have been approved by the Planning Department before site permit application for the first building, and the plan shall be implemented for each new building upon the issuance of the certificate of occupancy for that building.

The TDM plan shall be submitted to the Planning Department for approval to ensure that components of the plan intended to meet the reduction target are shown in the plan and/or ready to be implemented upon the issuance of each certificate of occupancy.

The TDM plan shall remain a component of the proposed project and variant to be implemented for the duration of the proposed project or variant.

**TDM Plan Monitoring and Reporting:** The TDM Coordinator shall collect data, prepare monitoring reports, and submit them to the Planning Department. To ensure that the goal of reducing by at least 15 percent the aggregate daily one-way vehicle trips is reasonably achievable, the project sponsor shall monitor daily one-way vehicle trips for all buildings that have received a certificate of occupancy and that are at least 75 percent occupied, and shall compare these vehicle trips to the aggregate daily one-way vehicle trips anticipated for ~~the~~ those buildings based on the trip generation rates contained within the project's Final Transportation Impact Study.

**Timing.** The TDM Coordinator shall collect monitoring data and shall begin submitting monitoring reports to the Planning Department 18 months after issuance of the first certificate of occupancy for

*buildings that are at least 75 percent occupied on the 700 Innes property that include off-street parking or the establishment of surface parking lots or garages. Thereafter, annual monitoring reports shall be submitted (referred to as “reporting periods”) until five consecutive reporting periods show that the fully built project has met the reduction goal. From that point on, monitoring data shall be submitted to the Planning Department once every three years. Each trip count and survey (see below for description) shall be completed within 30 days after the end of the applicable reporting period. Each monitoring report shall be completed within 90 days after the applicable reporting period. The timing of monitoring reports shall be modified so that a new monitoring report is submitted 12 months after adjustments are made to the TDM plan to meet the reduction goal, as may be required under the “TDM Plan Adjustments” heading, below. In addition, the Planning Department may modify the timing of monitoring reports as needed to consolidate this requirement with other monitoring and/or reporting requirements for the proposed project or variant, such as annual reporting under the proposed project’s or variant’s development agreement.*

**Term.** *The project sponsors shall monitor, submit monitoring reports, and make plan adjustments until the earlier of: (i) the expiration of the development agreement, or (ii) the date the Planning Department determines that the reduction goal has been met for up to eight consecutive reporting periods.*

~~*Notwithstanding the foregoing or any other provision of this mitigation measure, all obligations for monitoring, reporting, and adjusting the TDM plan shall terminate if the project sponsor has paid and/or made a commitment to pay the offset fee for any shortfall in the TDM plan's meeting the reduction goal as provided below.*~~

**Components:** *The monitoring and reporting, including trip counts, surveys and travel demand information, shall include the following components or comparable alternative methodology and components, as approved, accepted or provided by Planning Department staff:*

- (1) Trip Count and Intercept Survey: Provide a site-wide trip count and intercept survey of persons and vehicles arriving and leaving the project site for no less than two days during the reporting period between 6:00 a.m. and 8:00 p.m. One day shall be a Tuesday, Wednesday, or Thursday on which San Francisco public schools are in session during one week without federally recognized holidays, and another day shall be a Tuesday, Wednesday, or Thursday on which San Francisco public schools are in session during another week without federally recognized holidays. The trip count and intercept survey shall be prepared by a qualified transportation or survey consultant, and the Planning Department shall approve the methodology prior to the Project Sponsors conducting the components of the trip count and intercept survey. The Planning Department anticipates it will have a standard trip count and intercept survey methodology developed and available to project sponsors at the time of data collection.*
- (2) Travel Demand Information: The above trip count and survey information shall be able to provide the travel demand analysis characteristics (work and non-work trip counts, origins and destinations of trips to/from the project site, and modal split information), as outlined in the Planning Department’s Transportation Impact Analysis Guidelines for Environmental Review, October 2002, or subsequent updates in effect at the time of the survey.*

- (3) *Documentation of Plan Implementation: The TDM coordinator shall work in conjunction with the Planning Department to develop a survey (online or paper) that can be reasonably completed by the TDM coordinator and/or Transportation Management Association (TMA) staff members to document implementation of TDM program elements and other basic information during the reporting period. The project sponsors shall include this survey in the monitoring report submitted to the Planning Department.*
- (4) *Assistance and Confidentiality: The Planning Department will assist the TDM coordinator with questions regarding the components of the monitoring report and will assist the TDM coordinator in determining ways to protect the identity of individual survey responders.*

***TDM Plan Adjustments.*** *The project sponsors shall adjust the TDM plan based on the monitoring results if three consecutive reporting periods demonstrate that measures in the TDM plan are not achieving the reduction goal. The TDM plan adjustments shall be made in consultation with Planning Department staff and may require refinements to existing measures (e.g., change to subsidies, increased bicycle parking), inclusion of new measures (e.g., a new technology), or removal of existing measures (e.g., measures shown to be ineffective or induce vehicle trips). If the Planning Department determines that the reduction goal has been met for eight consecutive reporting periods, the TDM Plan in place at the time of the eighth consecutive successful reporting period shall be considered the final TDM Plan.*

*If the monitoring results from three consecutive reporting periods demonstrate that measures in the TDM plan are not achieving the reduction goal, the TDM plan adjustments shall occur within 270 days after the last consecutive reporting period. The TDM plan adjustments shall occur until the monitoring results of three consecutive reporting periods demonstrate that the reduction goal is achieved.*

*If after implementing TDM plan adjustments, the project sponsors have not met the reduction goal for up to eight consecutive reporting periods, as determined by the Planning Department, then the project sponsors may, at any time thereafter, elect to use another means to address the shortfall in meeting the TDM plan reduction target. Specifically, in addition to paying the emission offset fees set forth in Mitigation Measure M-AQ-1d, the project sponsors may pay an additional offset fee in accordance with Mitigation Measure M-AQ-1d. This additional offset fee would be the amount required to address both the shortfall in reduction during the previously monitored years and the anticipated shortfall in the remaining expected years of project operations. The anticipated shortfall shall be based on the shortfall that occurred in the most recently monitored year. Calculations of emissions to be offset shall be based on the total amount of emissions anticipated to be reduced by achieving the 15 percent TDM goal, adjusted for the actual percentage of aggregate daily one-way vehicle trip reduction achieved in the most recently monitored year. After paying this additional offset fee, the project sponsors shall continue to monitor, report, and adjust their TDM Plan in accordance with this Mitigation Measure M-AQ-1f, to ensure that the shortfall from the reduction goal does not increase significantly over time for the duration of the term defined herein. At the end of that term, the project sponsors' monitoring, reporting, and adjusting obligations of Mitigation Measure M-AQ-1f shall terminate, but the project sponsors shall continue to implement the final TDM Plan for the life of the project. The final TDM Plan shall be either a) the TDM Plan that met the reduction goal for eight consecutive reporting periods; or b) if the project sponsors have paid an additional offset fee, the TDM plan that achieved the highest reduction goal for any reporting period.*

The last paragraph on Draft EIR p. 3.7-76 is revised as follows:

***Operation***

***India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties***

After buildout of the proposed project or variant, localized odors emitted by project sources such as solid waste collection, food preparation, and maintenance activities should have minimal effects on on-site and off-site sensitive receptors. The project would not include facilities that may generate objectionable odors affecting a substantial number of people. If an Alternate Water Source System/Non-Potable Water System as described in Section 3.12, “Utilities and Service Systems” (Impacts UT-1 and UT-2) were installed as part of the proposed project, its operation would be subject to the provisions of San Francisco Health Code Article 12C and the San Francisco Department of Public Health Director’s Rules and Regulations Regarding the Operation of Alternate Water Systems (“Rules and Regulations”). The Rules and Regulations include requirements that the system shall not emit offensive odors.<sup>FN</sup> Violations of the provisions of Article 12C or the Rules and Regulations could result in suspension or revocation of a permit to operate the Alternate Water Source System/Non-Potable Water System. Furthermore, BAAQMD Regulation 7 limits odorous substances and specific odorous compounds from restaurants that employ more than five persons, like those that may be present at the project site. Therefore, operational odor impacts would be *less than significant*. No mitigation measures are necessary.

A new footnote at the bottom of Draft EIR p. 3.7-76 is added:

<sup>FN</sup> San Francisco Department of Public Health, San Francisco Department of Public Health Director’s Rules and Regulations Regarding the Operation of Alternate Water Systems, Tables 2 through 6 and pp. 32-33, August 2017.

The first paragraph on Draft EIR p. 3.7-77 is revised as follows:

***Overall Impact Conclusion***

The proposed project or variant would have a *less than significant* impact due to construction or operation for objectionable odors. Project construction under the proposed project or variant would include minor sources of odors such as diesel engine exhaust, asphalt paving or architectural coatings but these would be confined to the immediate area of application and would be temporary. Project operation would include localized sources of odors such as food preparation, solid waste collection or buildings and grounds maintenance activities that would not affect a substantial number of people at any one time. As discussed above, the operation of an Alternate Water Source System /Non-Potable Water System, if one were to be installed, would not result in offensive odors because the required permit from SFDPH would not authorize the system to emit offensive odors.

\* The following reference on p. 3.7-88 is revised as follows:

———. 20178. Air Quality Index Report. Available: <https://www.epa.gov/outdoor-air-quality-data/air-quality-index-report>. Accessed July 20178.

***Section 3.9, “Wind”***

- \* The following reference on p. 3.9-22 is revised as follows:

San Francisco, City and County of (San Francisco). ~~1996~~2014. *San Francisco General Plan*. Recreation and Open Space Element. San Francisco, CA.

### **Section 3.10, “Shadow”**

- \* The following text changes have been made to Draft EIR Section 3.10, “Shadow,” on p. 3.10-2:

#### **India Basin Shoreline Park Property**

India Basin Shoreline Park is an existing RPD park located between Hunters Point Boulevard and Pacific Gas and Electric Company’s vacant parcels to the north (off-site) and the 900 Innes property to the south (on-site). The park’s publicly accessible recreational and open space facilities consist of two play structures, a basketball court, a portion of the Blue Greenway/San Francisco Bay Trail (Bay Trail), artwork by local artists and students, barbeque grills, seating areas, a water fountain, educational signage, and landscaping, including trees.

~~No shadows are currently cast on India Basin Shoreline Park, because no buildings are located adjacent to this property.~~ India Basin Shoreline Park has an area of about 276,957 sq. ft. (6.36 acres) and has 4,594,210 sfh of shade annually. The TAAS at India Basin Shoreline Park is 1,030,667,780 sfh, meaning that this property is shaded 0.44 percent of the year.

#### **900 Innes Property**

The 900 Innes ~~property, which is an RPD property,~~ consists of seven parcels totaling ~~2.4 acres, 0.6 acre of which is submerged,~~ about 88,613 sq. ft. (2.03 acres) that are located between the India Basin Shoreline Park and India Basin Open Space properties (Figure 2-2). This property is a former maritime industrial site that contains five structures between 10 and 25 feet tall, totaling approximately 7,760 gross square feet (gsf). ~~Some shadows from buildings on this property are cast on the 900 Innes property; however, these shadows do not reach any nearby publicly accessible parks or open spaces.~~ This property is currently not used as a park or open space. The 900 Innes property has 29,611,011 sfh of shade annually, and the TAAS is 329,764,418 sfh, meaning that this property is shaded 8.98 percent of the year.

#### **India Basin Open Space Property**

The India Basin Open Space property contains a publicly accessible natural area located along the India Basin waterfront on San Francisco Bay (Bay), north of Hudson Avenue. The main entry point to this property is at the end of Arelious Walker Drive, off Innes Avenue. India Basin Open Space is an existing 6.2-acre RPD open space consisting of benches, a walking path, upland habitat, tidal salt marsh, mudflats, sand dunes, and native vegetation that borders the Bay.

The area around the India Basin Open Space property that was evaluated has a total area of ~~287,334~~ 319,111 sq. ft.<sup>2</sup> that currently has ~~363,855~~ 876,170 sfh of shade annually. The TAAS at the India Basin Open Space is ~~4,069,284,748~~ 1,187,539,675 sfh, meaning that this property is shaded ~~0.034~~ 0.07 percent of the year.

- \* Text in footnote 2, Draft EIR p. 3.10-2, has been revised, as follows

The shadow report (Appendix I) analyzes a larger area for the India Basin Open Space property to be more conservative and represent the maximum development potential for this property.

- \* The following text changes have been made to Draft EIR Section 3.10, “Shadow,” on p. 3.10-4:

On February 7, 1989, pursuant to Proposition K, the Planning Commission and the Recreation and Park Commission adopted a joint resolution establishing criteria for determination of significant shadows on 14 downtown parks, as described in a February 3, 1989 memorandum regarding Proposition K, and summarized in an infographic on June 6, 2018 (San Francisco, 1989-RPD, 2018). These criteria establish an “absolute cumulative limit” (ACL) for new shadow allowed in these parks, as well as qualitative criteria for allocating the ACL among individual development projects. India Basin Shoreline Park and India Basin Open Space are not among the 14 downtown parks for which ACLs were established.

- \* The following text changes have been made to Draft EIR Section 3.10, “Shadow,” on p. 3.10-8:

**India Basin Shoreline Park Property**

India Basin Shoreline Park has a total area of 276,957 sq. ft.<sup>New Footnote 1</sup> and currently has 4,594,210 sfh of shade annually. Based on the property’s TAAS of 1,030,667,780 sfh, the open space is currently shaded 0.44 percent of the year.

Table 3.10-1 presents the TAAS calculations for India Basin Shoreline Park.

(New) **Table 3.10-1: Theoretical Annual Available Sunlight at India Basin Shoreline Park**

<u>Park area</u>	<u>276,957 sq. ft.</u>
<u>Hours of annual available sunlight (from 1 hour after sunrise to 1 hour before sunset on each day)</u>	<u>3,721.4 hours</u>
<u>Theoretical Annual Available Sunlight</u>	<u>1,030,667,780 sfh</u>

Notes: sfh = square foot-hours; sq. ft. = square feet  
Source: San Francisco, 2018

As part of the either the proposed project or the variant, India Basin Shoreline Park would be redesigned to serve the surrounding community and enhance citywide program offerings. The Blue Greenway/Bay Trail and Class I bicycle lane would continue through this park. Pedestrian, bicycle, and vehicular access to the shoreline would be enhanced, and approximately 2,700 gsf of institutional uses, in the form of the outfitters building (kayak concessions, office, and restroom), covered outdoor space, and a multi-stall restroom near the playground would be built at India Basin Shoreline Park. The maximum height of proposed buildings on this property would be 25 feet. The buildings proposed to be constructed in the park, along with the buildings proposed on the 700 Innes property, would cast new shadows on India Basin Shoreline Park.

With implementation of the variant, India Basin Shoreline Park would have 5,074,648 sfh of shade annually, with the variant’s buildings and structures contributing 480,438 sfh (0.05 percent) net new shading. The day of maximum shading would occur on December 20. On that day, new shadows from the

variant's buildings and structures would create an increase of 9,507 sfh (0.29 percent) above current shading levels on this day. New shadows cast on India Basin Shoreline Park by the variant on this day would occur in the morning.

Tables 3.10-2 and 3.10-3 summarize shadow impacts on India Basin Shoreline Park.

(New) **Table 3.10-2: Annual Shading at India Basin Shoreline Park**

	<u>Annual Shading (sfh)</u>	<u>Annual Shading (% of TAAS)</u>
<u>Existing Conditions</u>	<u>4,594,210</u>	<u>0.44%</u>
<u>Variant</u>	<u>5,074,648</u>	<u>0.49%</u>
<u>Net New Shading</u>	<u>480,438</u>	<u>0.05%</u>

Notes: sfh = square foot-hours; TAAS = Theoretical Annual Available Sunlight  
Source: San Francisco, 2018

(New) **Table 3.10-3: India Basin Shoreline Park—Day of Maximum Shading**

<u>Date(s) when maximum new shading would occur</u>	<u>December 20</u>
<u>Percentage net new shading on date(s) of maximum shading</u>	<u>0.29%</u>
<u>Total net new shading on date(s) of maximum shadow</u>	<u>9,507 sfh</u>

Note: sfh = square foot-hours  
Source: San Francisco, 2017 2018

The shadow diagrams provided in Figures 3.10-2 through 3.10-12 provide a visual representation of the new shadows that would be cast on India Basin Shoreline Park by the variant's buildings and structures on 5 representative days of the year. Figures showing results on an hourly basis, starting 1 hour after sunrise and ending 1 hour before sunset, are provided in Appendix I and summarized for the days below.

- Vernal/autumnal equinox, March 21/September 21: The buildings proposed to be constructed in the park would shadow portions of the park throughout the day, but given the low heights of these buildings, their shadows would be relatively short in length and duration. Shadow from the proposed buildings on the 700 Innes property would reach the southeastern corner of the park in the morning during late fall and early spring. The shadow, which is not expected to last more than 30 minutes, would gradually decrease in area and recede eastward across the park, moving off the park before 9:00 a.m. The affected portion of the park is currently a landscaped area that does not include any pedestrian pathways or seating areas.
- Summer solstice, June 21: The buildings proposed to be constructed in the park would shadow portions of the park throughout the day, but given the low heights of these buildings, their shadows would be relatively short in length and duration. Shadow from the proposed buildings on the 700 Innes property would not reach the park during the summer.
- Winter solstice, December 21: Shadow from some of the proposed buildings on the 700 Innes property would reach the southeastern corner of the park at the beginning of the day. The shadow, which is not expected to last more than 30 minutes, would gradually decrease in area and recede

eastward across the park, moving off the park before 9:00 a.m. The affected portion of the park is currently a landscaped area that does not include any pedestrian pathways or seating areas.

- “Worst-case” shadow day, December 20: The worst day of the year, in terms of overall sfh of net new shadow cast on India Basin Shoreline Park by the variant, has been identified to be December-20. The maximum net new shadow cast on this property by the variant’s buildings and structures would occur at 3:58 p.m.

~~As part of the either the proposed project or the variant, India Basin Shoreline Park would be redesigned to serve the surrounding community and enhance citywide program offerings. The Blue Greenway/Bay Trail and Class I bicycle lane would continue through this park. Pedestrian, bicycle, and vehicular access to the shoreline would be enhanced, and approximately 2,700 gsf of institutional uses, in the form of the outfitters building (kayak concessions, office and restroom), covered outdoor space, and a multi-stall restroom near the playground would be built at India Basin Shoreline Park. The~~ As discussed above, the maximum height of proposed buildings on this property would be 25 feet. Compared to taller buildings, a 25-foot-tall building would cast shadows that are shorter in length and duration and, in general, would cover a smaller area (i.e., a shorter building would result in a smaller shadow fan than would a taller building). Because of the relatively low heights of the buildings proposed to be constructed in the park, shadows cast by these buildings would not substantially affect the public’s ability to use and enjoy the park. ~~During the winter, shadow from some of the proposed buildings on the 700 Innes property would reach the southeastern corner of the park at the beginning of the day. The shadow, which is not expected to last more than 20-30 minutes, would gradually decrease in area and recede eastward across the park, moving off the park before 9:00 a.m. The affected portion of the park is currently a landscaped area that does not include any pedestrian pathways or seating areas. Given the short duration of the shadow and the use of the affected portion of the park, shadow from the proposed buildings on the 700 Innes property would not substantially affect the public’s ability to use and enjoy the park. Shadow from the proposed buildings on the 700 Innes property would not reach the park at any other time during the year.~~

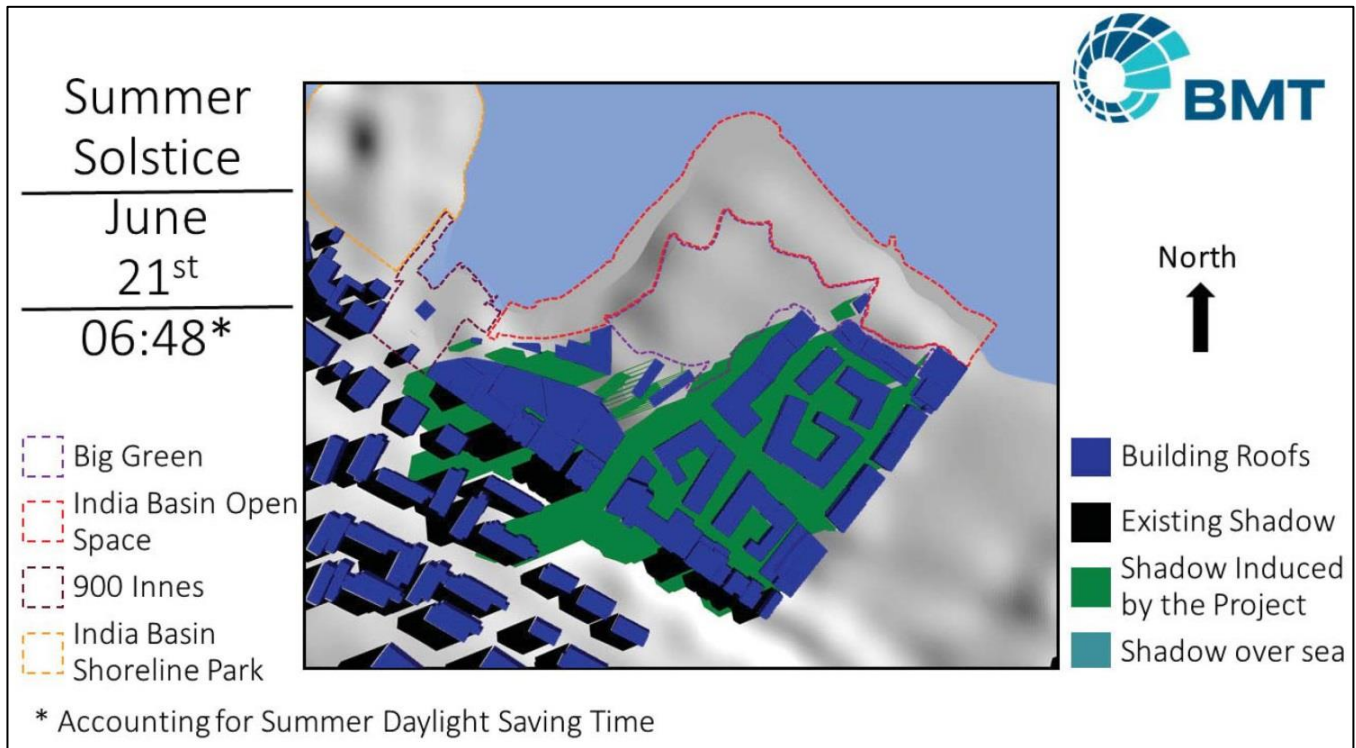
Therefore, implementation of the proposed project or variant would not create new shadow in a manner that would substantially affect India Basin Shoreline Park.

The shadow diagrams shown in Draft EIR Section 3.10, “Shadow,” were revised based on minor changes to the public open space boundaries. The shadow diagrams below accurately depict the boundaries of the existing and future open spaces at the project site. The revisions made to these shadow diagrams do not alter the analysis or conclusions in the Draft EIR.

- \* A new footnote has been added as part of the text changes introduced above:

New Footnote 1 India Basin Shoreline Park is 5.6 acres (243,936 sq. ft.). The square footage used in the shadow analysis (276,957 sq. ft./6.36 acres) includes rights-of-way within the park boundary. The rights-of-way are not under the jurisdiction of the Recreation and Park Commission, but they were included in the shadow analysis so that the entire park could be analyzed as a single functional area.

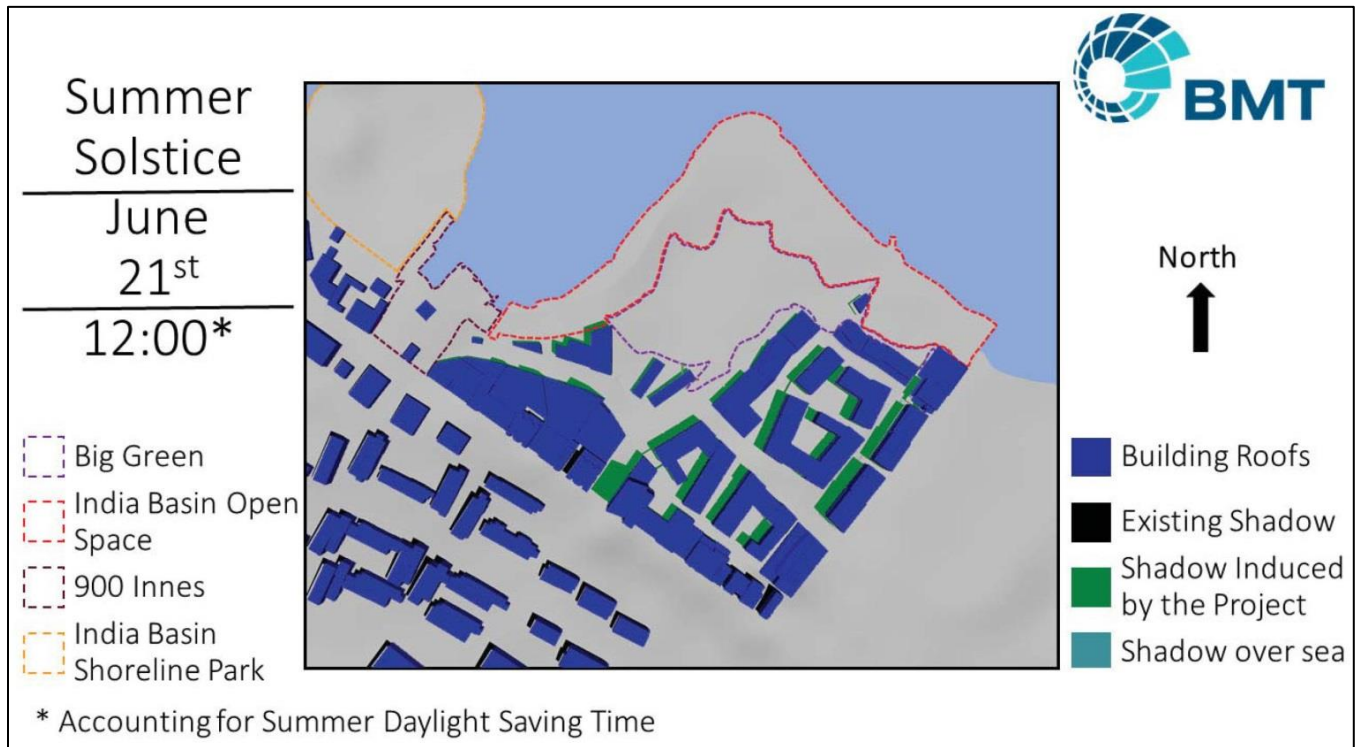




Source: San Francisco, 2017 BMT, 2018

(Revised) **Figure 3.10-2:**

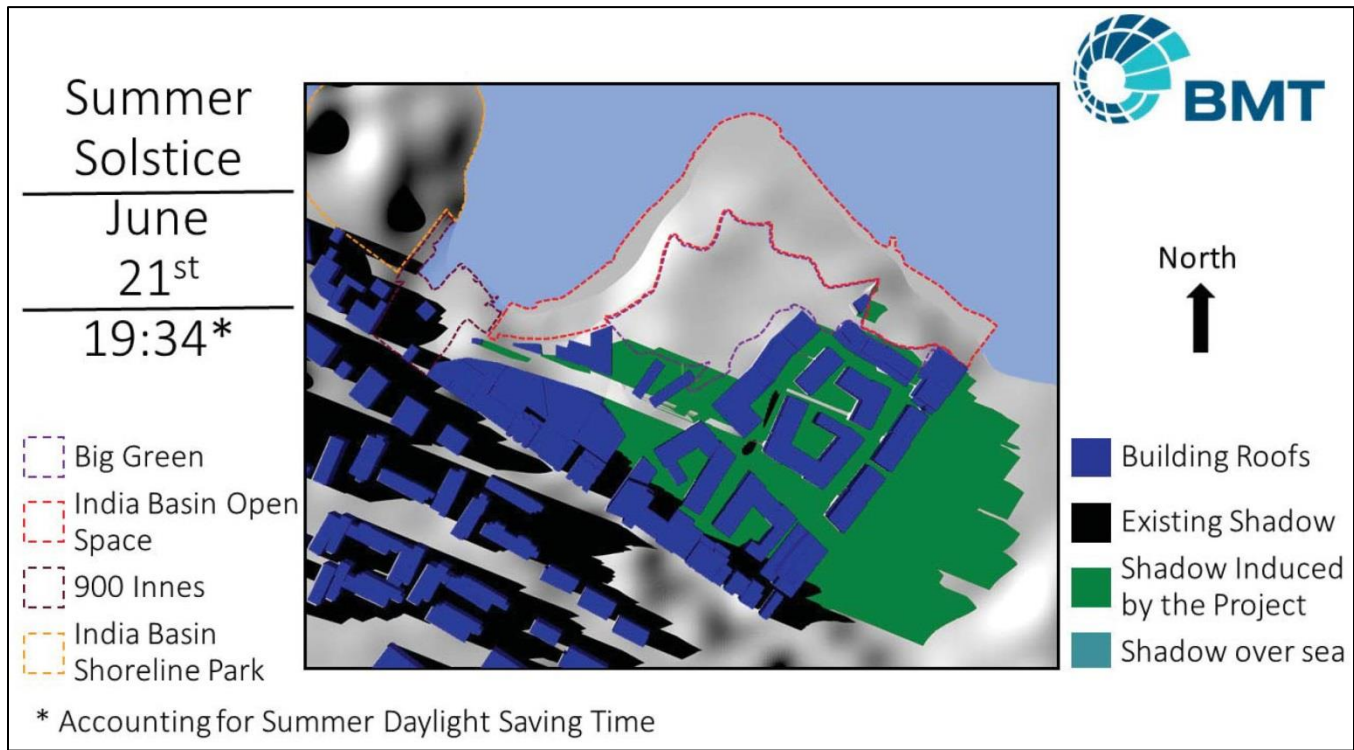
**Shadow Diagram, 1 Hour after Sunrise on the Summer Solstice (June 21, 6:48 a.m.)**



Source: San Francisco, 2017 BMT, 2018

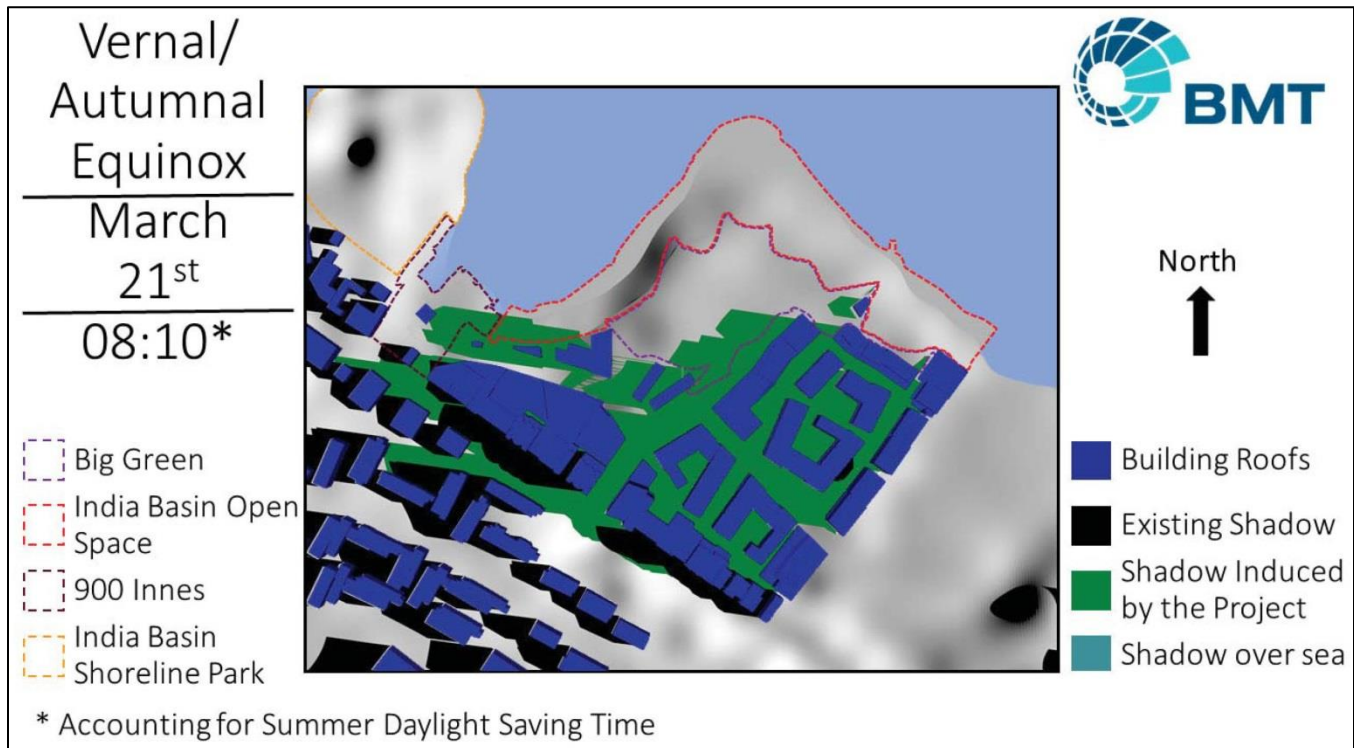
(Revised) **Figure 3.10-3:**

**Shadow Diagram, Noon on the Summer Solstice (June 21, 12:00 p.m.)**



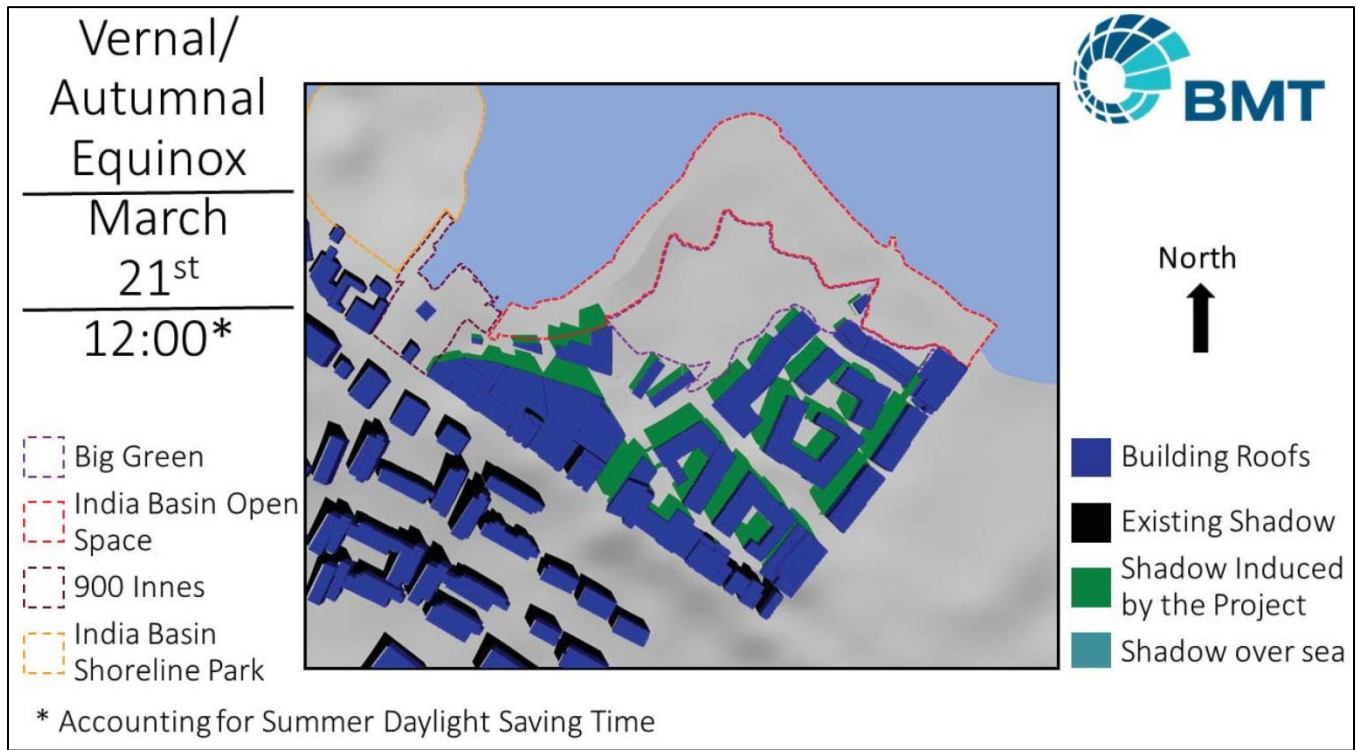
Source: San Francisco, 2017 BMT, 2018

(Revised) **Figure 3.10-4:** Shadow Diagram, 1 Hour before Sunset on the Summer Solstice (June 21, 7:34 p.m.)



Source: San Francisco, 2017 BMT, 2018

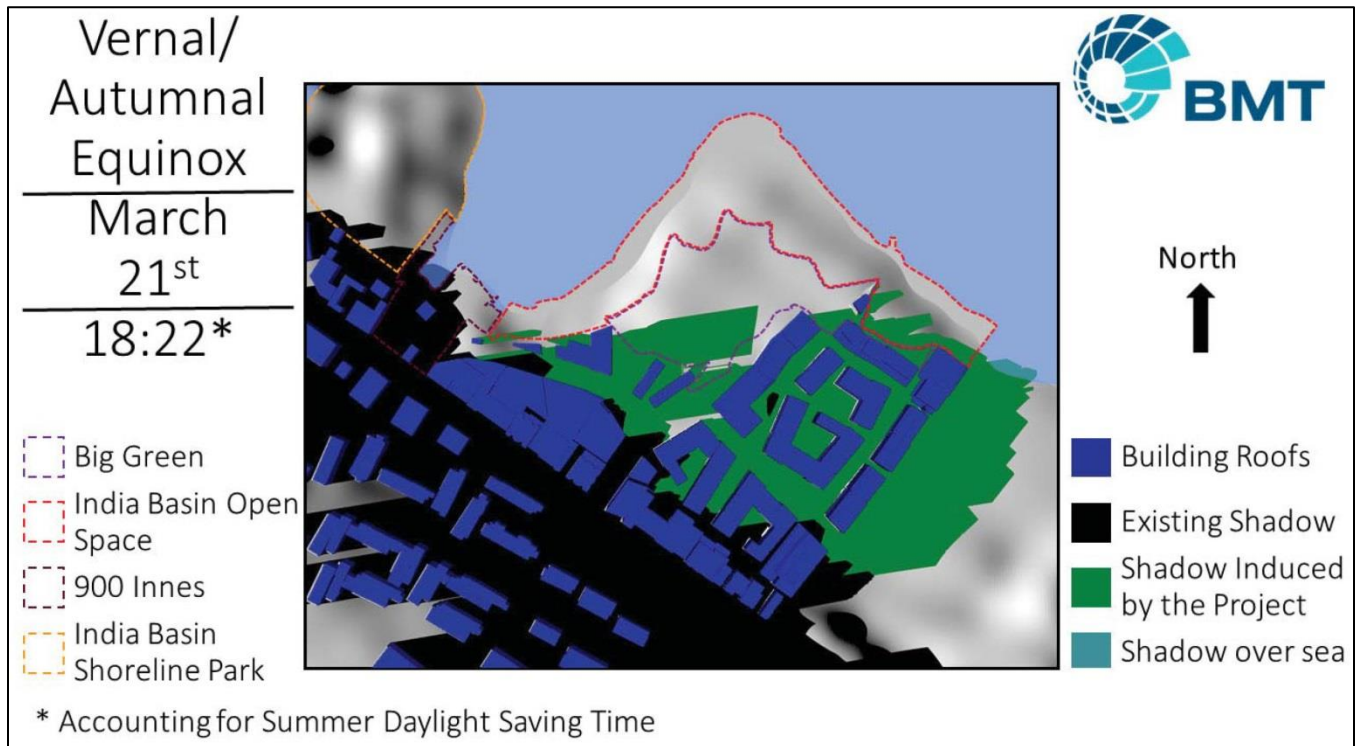
(Revised) **Figure 3.10-5:** Shadow Diagram, 1 Hour after Sunrise on the Vernal/Autumnal Equinox (March 21/September 21, 8:10 a.m.)



Source: [San Francisco, 2017 BMT, 2018](#)

(Revised) **Figure 3.10-6:**

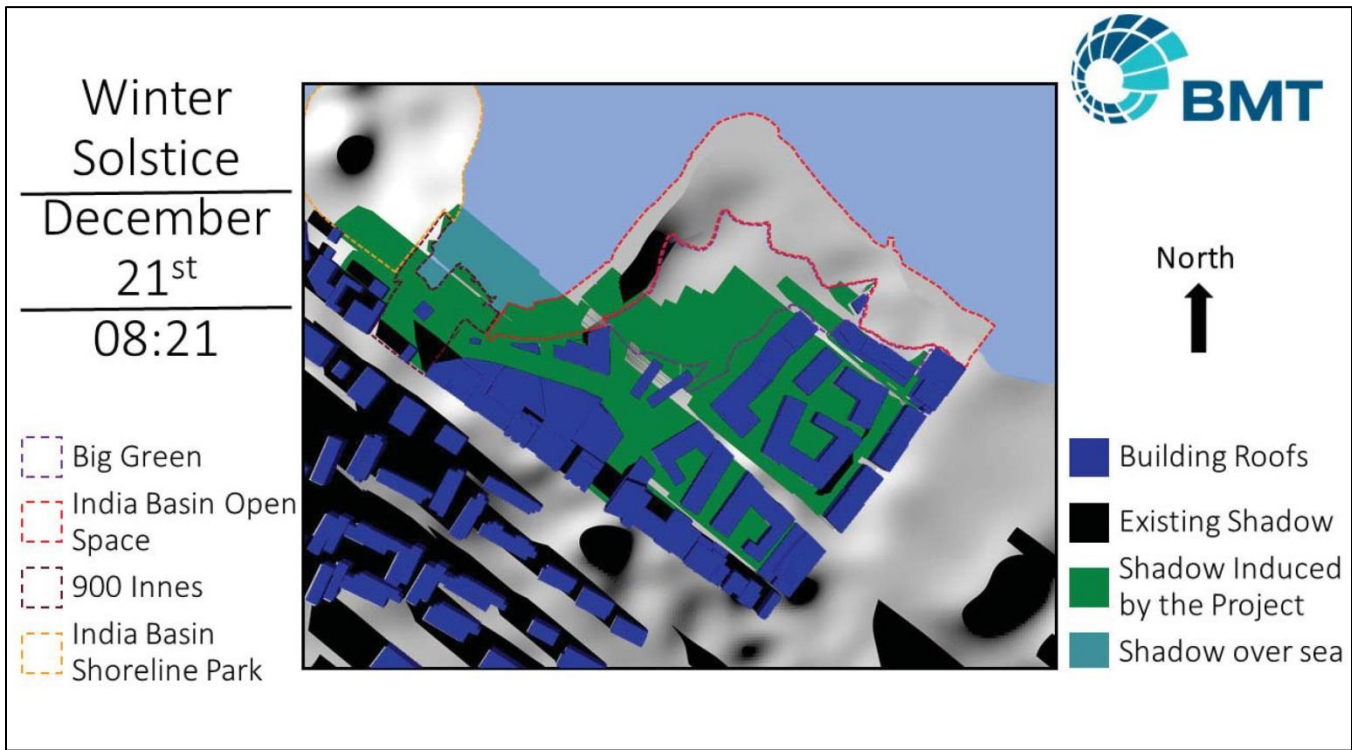
**Shadow Diagram, Noon on the Vernal/Autumnal Equinox  
(March 21/September 21, 12:00 p.m.)**



Source: [San Francisco, 2017 BMT, 2018](#)

(Revised) **Figure 3.10-7:**

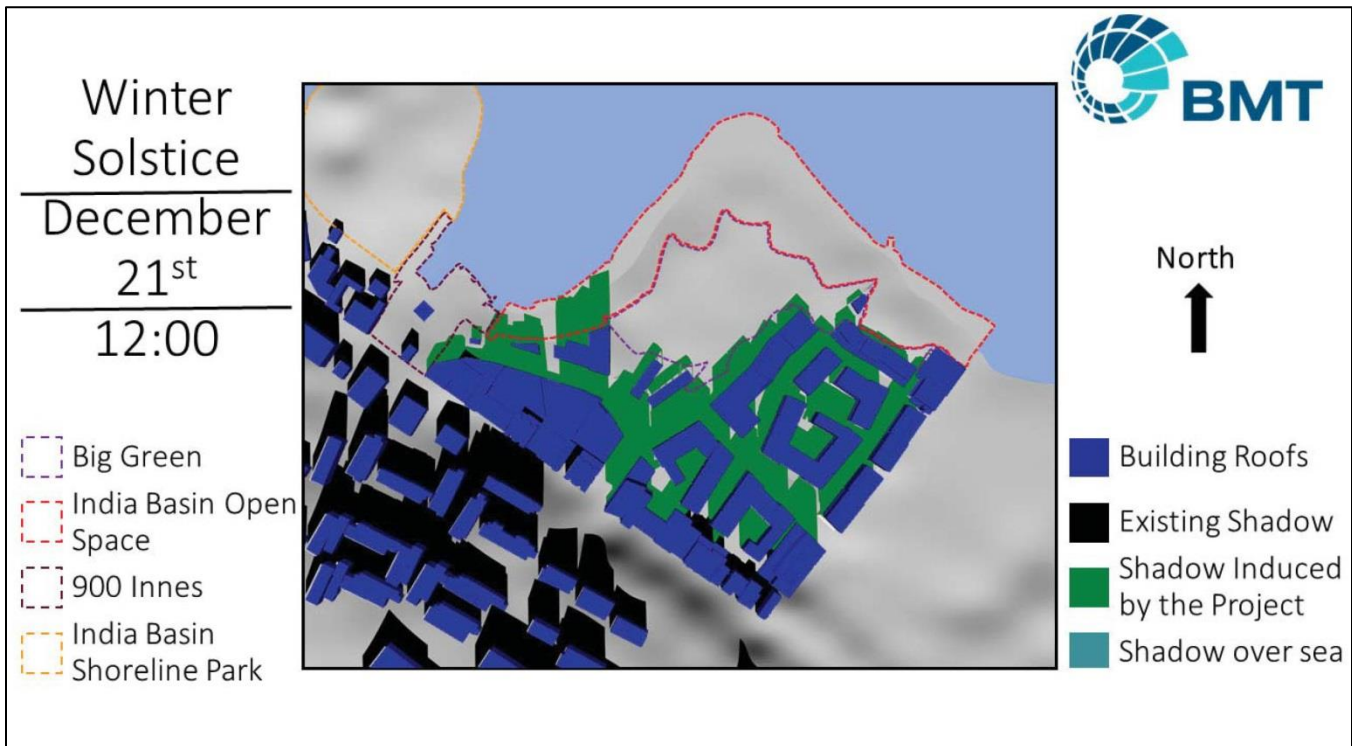
**Shadow Diagram, 1 Hour before Sunset on the Vernal/Autumnal Equinox  
(March 21/September 21, 6:22 p.m.)**



Source: ~~San Francisco~~, 2017 BMT, 2018

(Revised) **Figure 3.10-8:**

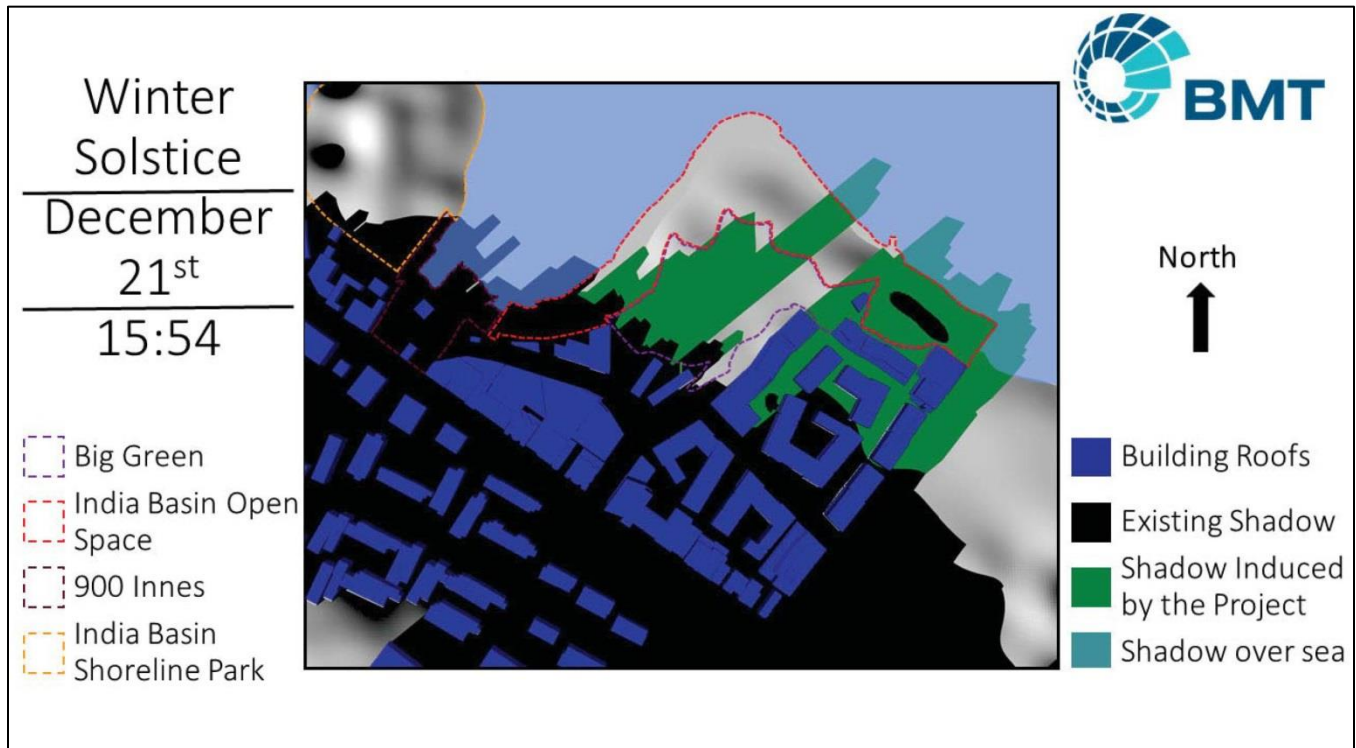
**Shadow Diagram, 1 Hour after Sunrise on the Winter Solstice  
(December 21, 8:21 a.m.)**



Source: ~~San Francisco~~, 2017 BMT, 2018

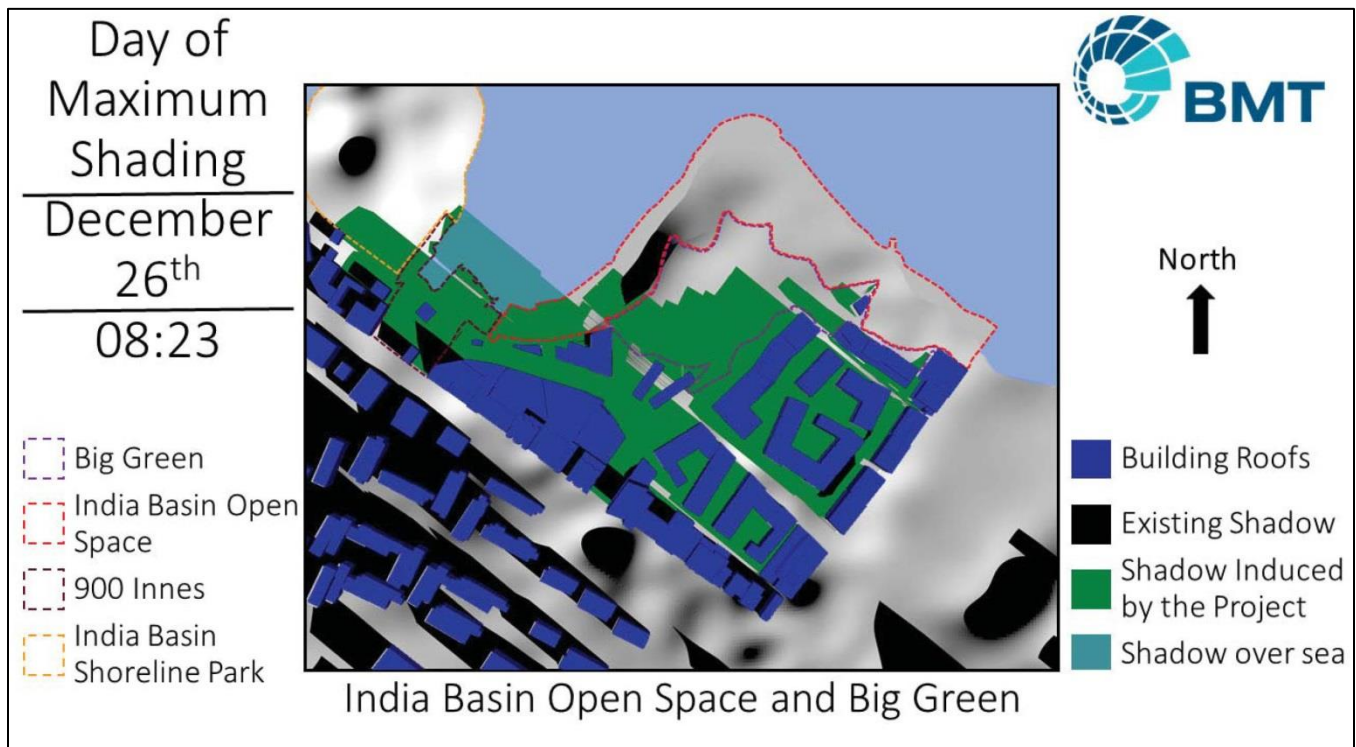
(Revised) **Figure 3.10-9:**

**Shadow Diagram, Noon on the Winter Solstice  
(December 21, 12:00 p.m.)**



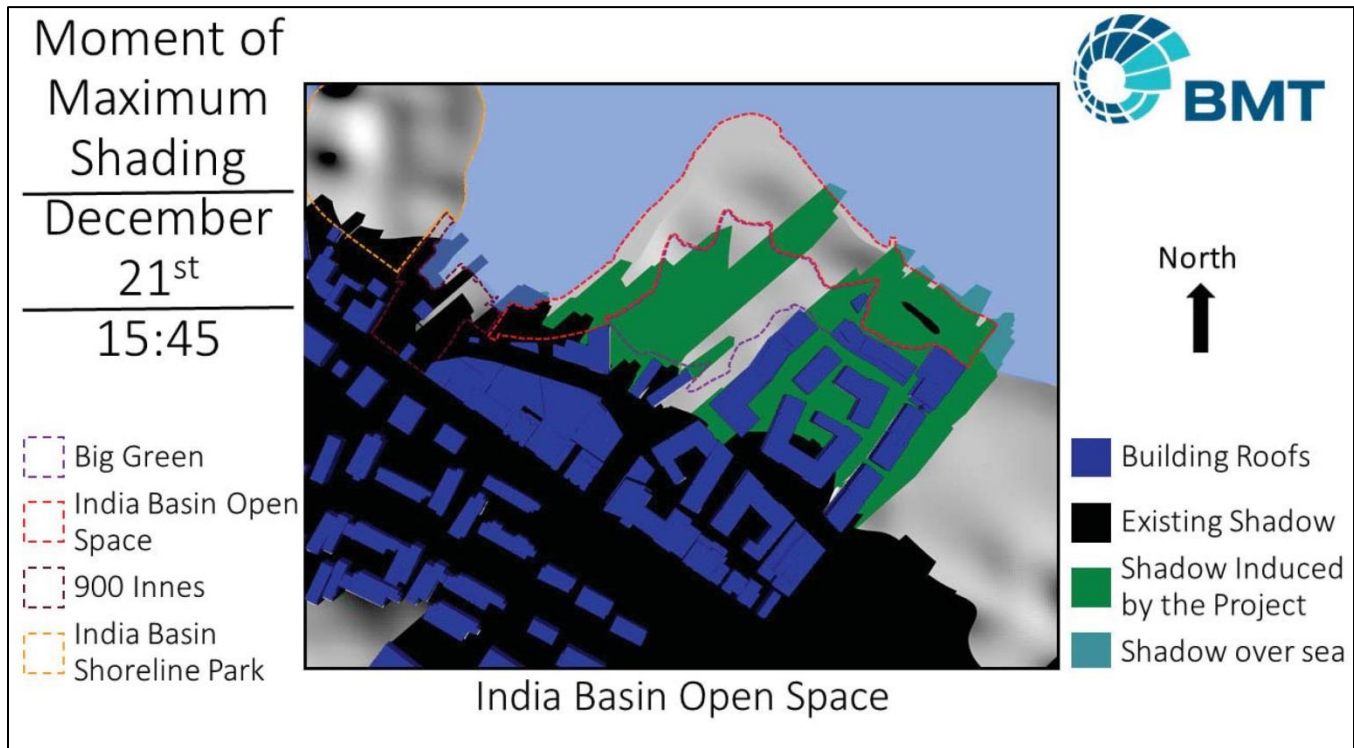
Source: San Francisco, 2017 BMT, 2018

(Revised) **Figure 3.10-10: Shadow Diagram, 1 Hour before Sunset on the Winter Solstice (December 21, 3:54 p.m.)**



Source: San Francisco, 2017 BMT, 2018

(Revised) **Figure 3.10-11: Shadow Diagram, Date of Maximum Overall Shading at the India Basin Open Space and Big Green, 1 Hour after Sunrise (December 27<sup>th</sup>, 8:23 a.m.)**



Source: ~~San Francisco~~BMT, 2017~~8~~

(Revised) **Figure 3.10-12: Shadow Diagram, Moment of Maximum Overall Shading at the India Basin Open Space (December 21, 3:00~~45~~ p.m.)**

\* The following text changes have been made to Draft EIR Section 3.10, “Shadow,” on pp. 3.10-22–3.10-25:

**India Basin Open Space Property**

The India Basin Open Space property has a total area of ~~287,334~~ 319,111 sq. ft.<sup>5</sup> and currently has ~~363,855~~ 876,170 sfh of shade annually. Based on the property’s TAAS of ~~1,069,284,748~~ 1,187,539,675 sfh, the open space is currently shaded ~~0.03~~ 0.07 percent of the year.

Table ~~3.10-1~~ 3.10-4 presents the TAAS calculations for the India Basin Open Space property.

(Revised) **Table ~~3.10-1~~ 3.10-4: Theoretical Annual Available Sunlight at the India Basin Open Space Property**

Park area	<del>287,334</del> <u>319,111</u> sq. ft.
Hours of annual available sunlight (from 1 hour after sunrise to 1 hour before sunset on each day)	3,721.4 hours
Theoretical Annual Available Sunlight	<del>1,069,284,748</del> <u>1,187,539,675</u> sfh

Notes: sfh = square foot–hours; sq. ft. = square feet  
Source: San Francisco, ~~2017~~ 2018

As described above, the variant is considered the “worst case” or more conservative scenario, and shadow diagrams were produced only for the variant. The following analysis of operational shadow impacts is for the variant only.

With implementation of the variant, there would be ~~39,506,930~~ 62,944,306 sfh of annual shade on the India Basin Open Space property, with the variant contributing ~~39,143,075~~ 62,068,136 sfh, or ~~3.66~~ 5.23 percent, net additional shading. The day of maximum shading would occur on December ~~27~~ 26; new shadows from the variant would create an increase of ~~248,399~~ 391,393 sfh, or ~~7.78~~ 10.37 percent, above current shading levels on this day. The new shadows from the variant on the open space on this day would occur in the afternoon hours.

~~The largest net new shadow area cast on the India Basin Open Space property would be 75,427 sq. ft., or 26.25 percent of the total India Basin Open Space area. The moment of maximum shading on the India Basin Open Space would occur on February 2 at 4:33 p.m.~~

Tables ~~3.10-2 through 3.10-4~~ 3.10-5 and 3.10-6 summarize shadow impacts on the India Basin Open Space property.

(Revised) **Table ~~3.10-2~~ 3.10-5: Annual Shading at the India Basin Open Space Property**

	Annual Shading (sfh)	Annual Shading (% of TAAS)
Existing Conditions	<del>363,855</del> <u>876,170</u>	<del>0.03</del> <u>0.07%</u>
Variant	<del>39,506,930</del> <u>62,944,306</u>	<del>3.69</del> <u>5.30%</u>
Net New Shading	<del>39,143,075</del> <u>62,068,136</u>	<del>3.66</del> <u>5.23%</u>

Notes: sfh = square foot-hours; TAAS = Theoretical Annual Available Sunlight  
Source: San Francisco, ~~2017~~ 2018

(Revised) **Table ~~3.10-3~~ 3.10-6: India Basin Open Space Property—Day of Maximum Shading**

Date(s) when maximum new shading would occur	December <del>27</del> <u>26</u>
Percentage net new shading on date(s) of maximum shading	<del>7.78</del> <u>10.37%</u>
Total net new shading on date(s) of maximum shadow	<del>248,399</del> <u>391,393</u> sfh

Note: sfh = square foot-hours  
Source: San Francisco, ~~2017~~ 2018

**Table ~~3.10-4~~: India Basin Open Space Property—Time and Date of Maximum Shading**

Time and date when maximum new shading would occur	February 2, 4:33 p.m.
Percentage net new shading on time and date of maximum shading	26.25%
Total net new shading on time and date of maximum shadow	75,427 sq. ft.

Note: sq. ft. = square feet  
Source: San Francisco, ~~2017~~ 2018

~~The shadow diagrams provided in Figures 3.10-2 through 3.10-14 provide a visual representation of the new shadows that would be cast on the India Basin Open Space property by the variant's buildings and structures on 5 representative days of the year. Figures showing results on an hourly basis, starting 1 hour after sunrise and ending 1 hour before sunset, are provided in Appendix I and summarized for the days~~

~~below.~~ The shadow conditions under the variant on five representative days of the year are summarized below.

- *Vernal/autumnal equinox, March 21/September 21:* New shadows would be cast on the India Basin Open Space property all day long, from ~~7:40~~ 8:10 a.m., predominantly on the southwest corner of the open space, with the maximum net new shadow occurring at 9:00 a.m.
- *Summer solstice, June 21:* New shadows would be cast on the India Basin Open Space property all day long, with the minimum net new shadow occurring at an hour after sunrise, at 6:48 a.m., and the maximum in the afternoon, at ~~6:34~~ 7:34 p.m., principally to the southeast of the open space.
- *Winter solstice, December 21:* The India Basin Open Space property would be exposed to new shadows all day long, with a minimum net new shadow occurring at ~~9:00~~ 8:21 a.m. and the maximum at 3:54 p.m., principally covering the southeast and southwest corners of the open space.
- *“Worst-case” shadow day, December 27 ~~26~~:* The worst day of the year, in terms of overall sfh of net new shadow cast on the India Basin Open Space property by the variant, has been identified to be December 27 26. ~~The maximum net new shadow cast on this property by the variant’s buildings and structures would occur at 3:58 p.m.~~
- ~~“Worst case” shadow time and day, for the India Basin Open Space property, February 2, 4:33 p.m.: This figure represents the moment when net new shadow cast on the India Basin Open Space property by the variant’s buildings and structures would reach its maximum area.~~

Nearly ~~8~~ A little more than 10 percent net new shading would be cast on the India Basin Open Space property by proposed buildings at the 700 Innes property during the days when maximum shading would occur. Over an entire year, ~~3.69~~ 5.30 percent of TAAS on the India Basin Open Space property would be shaded as a result of development at the 700 Innes property. As stated above in Section 3.10.2, “Regulatory Framework,” the India Basin Open Space is not among the 14 downtown parks for which absolute cumulative limits were established in Section 295 of the Planning Code. Moreover, additional shadow is permitted on the India Basin Open Space as long as the new shadow would not adversely affect use of the park. The acceptability of any new shadow is determined by the Planning and Recreation and Park commissions and takes into account the amount of area shaded, the duration of the shadow, the importance of sunlight to the type of open space, and the potential for the new shadow to adversely affect the use of the park. Because no absolute cumulative limit is established for the India Basin Open Space, the qualitative criteria applied in this case are similar to the qualitative criteria pursuant to CEQA. Thus, the discussion below focuses on how the open space would be used and whether new shadow would adversely affect these uses anticipated.

As stated in Section 3.10.1, “Environmental Setting,” the India Basin Open Space property is currently used primarily by pedestrians on the Blue Greenway/Bay Trail. The open, accessible nature of the India Basin Open Space, together with its location in a relatively quiet residential area of the City, would allow a substantial number of people to use it when simply crossing through the park. The primary types of activities at the India Basin Open Space property (e.g., walking, running, biking) are transitory and not particularly sensitive to the availability of sunlight, so net new shadow would not substantially affect the public’s ability to use and enjoy the open space. Furthermore, the “worst-case” shadow day, or the day when there would be the most net new sfh of shadow, would occur during the winter, on December 27 26 at ~~3:58~~ 3:57 p.m. According to the National Oceanic and Atmospheric Administration (NOAA 1995), more than 80 percent of San Francisco’s seasonal rain falls between November and March. The two



coldest months of the year are December and January (WRCC, 2006). Park usage would likely be the lowest during this time of the winter season, because the weather in this part of San Francisco is typically colder and rainier in the winter than in the more temperate spring, summer, and fall seasons.

Under either the proposed project or the variant, 2,000 gsf of commercial uses would be built immediately adjacent to the India Basin Open Space property to serve visitors to the publicly accessible beach and open space. These uses, consisting of a café, a maintenance facility, and rental and concessions facilities, would all be less than 25 feet in height. As discussed above, the shadows cast by 25-foot-tall buildings would be shorter in length and duration and would cover smaller areas than the shadows cast by taller buildings. Because the heights of the buildings proposed for construction immediately adjacent to the India Basin Open Space property would be relatively low, the shadows cast by those buildings would not be noticeable to users of this space.

As stated above, the “worst-case” shadow day would occur during the winter, on December ~~27~~ 26. Future recreational uses of the enhanced India Basin Open Space property could include people sitting on the beach, dog walkers, and kayakers. This is the time of year, and the time of day (late afternoon), when there would be the most sfh of shadow. It is assumed that the winter weather in this part of San Francisco, typically colder and rainier than in the spring, summer, and fall is likely to result in the year’s lowest use level of the open spaces. During the winter, because of the less temperate weather, park uses would likely be more active (walking or jogging) than passive (sitting or reading), and thus would not be adversely affected by shadow because the amount of time users would spend within the net new shadow areas would be substantially less. Therefore, new net shadow would not adversely affect the public’s ability to use and enjoy the open space, and implementation of the proposed project or variant would not create new shadow in a manner that would substantially affect the India Basin Open Space property.

- \* The following text changes have been made to Draft EIR Section 3.10, “Shadow,” on pp. 3.10-26–3.10-29:

### **Future Open Spaces on the Project Site**

#### **900 Innes Property**

Under either the proposed project or the variant, the 900 Innes property would be developed as a waterfront park providing a connection between India Basin Shoreline Park and the India Basin Open Space. The 900 Innes property would also provide a connection for the Blue Greenway/Bay Trail, the Class 1 bikeway, and pedestrian, bicycle, and vehicular access to the shoreline. Other potential project elements for this property include piers, fishing areas, plazas, event areas, tidal marshes, facilities for concessions, drinking fountains, restrooms, passive recreational areas for picnicking, shade structures, bicycle parking, wayfinding signage, and historical and education displays.

Once created, the future park on the 900 Innes property would be owned and operated by RPD and would be protected under Section 295 of the Planning Code. Because the 900 Innes property does not yet exist as an open space, the net new shadow cast on the 900 Innes property by the variant’s buildings and structures could not result in an impact under CEQA (i.e., the variant cannot affect an existing expectation of sunlight on an open space when that open space does not currently exist). The analysis below is presented for informational purposes.

The open space on the 900 Innes property would occupy a total area of 88,613 sq. ft.<sup>New Footnote 2</sup> This area currently has 29,611,011 sfh of shade annually. Based on the property's TAAS of 329,764,418 sfh, this area is currently shaded 8.98 percent of the year.

Table 3.10-7 presents TAAS calculations for the 900 Innes property.

(New) **Table 3.10-7: 900 Innes Property—Theoretical Annual Available Sunlight**

<u>Park area</u>	<u>88,613 sq. ft.</u>
<u>Hours of annual available sunlight (from 1 hour after sunrise to 1 hour before sunset on each day)</u>	<u>3,721.4 hours</u>
<u>Theoretical Annual Available Sunlight</u>	<u>329,764,418 sfh</u>

Notes: sfh = square foot-hours; sq. ft. = square feet  
Source: San Francisco, 2017-2018

With implementation of the variant, the 900 Innes property would have 44,542,109 of shade annually, with the variant's buildings and structures contributing 14,931,097 sfh (4.53 percent) net new shading. The day of maximum shading would occur on December 24. On that day, new shadows from the variant's buildings and structures would create an increase of 109,720 sfh (10.46 percent) above current shading levels on this day. New shadows cast on the 900 Innes property by the variant on this day would occur in the morning and early afternoon.

Tables 3.10-8 and 3.10-9 summarize shadow conditions on the 900 Innes property.

(New) **Table 3.10-8: Annual Shading at 900 Innes Property**

	<u>Annual Shading (sfh)</u>	<u>Annual Shading (% of TAAS)</u>
<u>Existing Conditions</u>	<u>29,611,011</u>	<u>8.98%</u>
<u>Variant</u>	<u>14,931,097</u>	<u>4.53%</u>
<u>Net New Shading</u>	<u>44,542,109</u>	<u>13.51%</u>

Notes: sfh = square foot-hours; TAAS = Theoretical Annual Available Sunlight  
Source: San Francisco, 2018

(New) **Table 3.10-9: 900 Innes Property—Day of Maximum Shading**

<u>Date(s) when maximum new shading would occur</u>	<u>December 24</u>
<u>Percentage net new shading on date(s) of maximum shading</u>	<u>10.46%</u>
<u>Total net new shading on date(s) of maximum shadow</u>	<u>109,720 sfh</u>

Note: sfh = square foot-hours  
Source: San Francisco, 2018

Either the proposed project or the variant would cast shadow on portions of the 900 Innes property throughout the year. The shadow conditions under the variant on five representative days of the year are summarized below.

- ~~*Winter:* At the beginning of the day, shadow from some of the proposed buildings on the 700 Innes property would cover most of the park. The shadow would gradually decrease in area and recede eastward across the park as the day progresses, moving off the park around 12:00 ~~2:00~~ p.m. For the remainder of the day, the only shadow cast on the park by the variant would be from two buildings not exceeding 20 feet in height that contain park serving commercial uses. At the end of the day, the entire park would be shadowed by existing off-site buildings and topographical features (e.g., the hill on the west side of Innes Avenue across from the project site).~~
- *Spring Vernal/autumnal equinox, March 21/September 21:* At the beginning of the day, shadow from some of the proposed buildings on the 700 Innes property would cover the eastern edge of the park. The shadow would gradually decrease in area and recede eastward across the park, moving off the park around ~~9:00 a.m.~~ 1:00 p.m. For the remainder of the day, the only shadow cast on the park by the variant would be from the aforementioned buildings that contain park-serving commercial uses. At the end of the day, most of the park would be shadowed by existing off-site buildings and topographical features.
- *Summer solstice, June 21:* ~~During the summer, the only shadow cast on the park by the variant would be from the aforementioned buildings that contain park serving commercial uses. At the beginning of the day, shadow from some of the proposed buildings on the 700 Innes property would cover the southernmost corner of the park. The shadow would gradually decrease in area and recede eastward across the park, moving off the park around 11:00 a.m. For the remainder of the day, the only shadow cast on the park by the variant would be from the aforementioned buildings that contain park-serving commercial uses. At the end of the day, most of the park would be shadowed by existing off-site buildings and topographical features.~~
- *Winter solstice, December 21:* ~~At the beginning of the day, shadow from some of the proposed buildings on the 700 Innes property would cover most of the park. The shadow would gradually decrease in area and recede eastward across the park as the day progresses, moving off the park around ~~12:00~~ 2:00 p.m. For the remainder of the day, the only shadow cast on the park by the variant would be from two buildings not exceeding 20 feet in height that contain park-serving commercial uses. At the end of the day, the entire park would be shadowed by existing off-site buildings and topographical features (e.g., the hill on the west side of Innes Avenue across from the project site).~~
- *“Worst-case” shadow day, December 24:* The worst day of the year, in terms of overall sfh of net new shadow cast on the 900 Innes property by the variant, has been identified to be December 24. The maximum net new shadow cast on the park by the variant’s buildings and structures would occur at 3:45 p.m.
- ~~*Fall:* The project shadow patterns would be the same as the shadow patterns during the spring.~~

Depending on the actual configuration and layout of the 900 Innes property, the project shadow could affect the park’s plazas, event areas, picnic areas, and pedestrian pathways. In general, the largest amount of shadow cast by the variant would occur during the winter. Park uses during the winter would likely be more active (walking or jogging) than passive (sitting, reading, gathering, or children playing), due to colder, rainy weather. Active uses are less likely to be negatively affected by shadow, as users engaging in these types of uses (walking or jogging) would spend less time in shaded areas because they would be moving through the open space rather than passively sitting. Moreover, the 900 Innes property is not an

existing park. As such, shadows cast on the 900 Innes property would not constitute an impact under CEQA.

**700 Innes Property**

The Big Green would be a publicly accessible open space on the 700 Innes property under either the proposed project or the variant. Once created, the Big Green would be transferred to SF Port, and operated under a memorandum of understanding with RPD. Because the Big Green would be privately owned at project buildout and would not be under the jurisdiction of the Recreation and Park Commission, it would not be subject to the provisions of Planning Code Section 295. The Big Green does not yet exist as an open space; therefore, net new shadow cast on the Big Green by the variant’s buildings and structures could not result in an impact under CEQA (i.e., the variant cannot affect an existing expectation of sunlight on an open space when that open space does not currently exist). The analysis below is presented for informational purposes only.

The Big Green would occupy a total area of ~~245,243~~ 219,982 sq. ft. This area currently has ~~817,661~~ 139,703 sfh of shade annually. As shown in Table ~~3.10-5~~ 3.10-10, the Big Green’s TAAS is ~~912,646,556~~ 818,641,015 sfh and the Big Green area is currently shaded ~~0.09~~ 0.02 percent of the year, ~~because the site is mostly vacant.~~

Table ~~3.10-5~~ 3.10-10 presents TAAS calculations for the “Big Green” proposed for the 700 Innes property.

(Revised) **Table ~~3.10-5~~ 3.10-10: Big Green—Theoretical Annual Available Sunlight**

Park area	<del>245,243</del> <u>219,982</u> sq. ft.
Hours of annual available sunlight (from 1 hour after sunrise to 1 hour before sunset on each day)	3,721.4 hours
Theoretical Annual Available Sunlight	<del>912,646,556</del> <u>818,641,015</u> sfh

Notes: sfh = square foot-hours; sq. ft. = square feet  
Source: San Francisco, ~~2017~~ 2018

~~Tables 3.10-6 through 3.10-8 summarize shadow impacts on the Big Green. As shown, with implementation of the variant:~~

- ~~• The Big Green would have 132,875,433 sfh of shade annually, with the variant’s buildings and structures contributing 132,057,772 sfh (14.47 percent) net new shading (Table 3.10-6).~~
- ~~• The day of maximum shading would occur on December 27. On that day, new shadows from the variant’s buildings and structures would create an increase of 567,336 sfh (19.57 percent) above current shading levels on the Big Green (Table 3.10-7). New shadows cast on the Big Green by the variant on this day would occur in the afternoon hours.~~
- ~~• The largest net new shadow area cast on the Big Green would be 138,637 sq. ft., or 56.53 percent of the total Big Green area. This shadow would be cast on January 1 at 4:00 p.m. (Table 3.10-8).~~

With implementation of the variant, the Big Green would have 90,932,382 sfh of shade annually, with the variant's buildings and structures contributing 90,792,679 sfh (11.09 percent) net new shading. The day of maximum shading would occur on December 26. On that day, new shadows from the variant's buildings and structures would create an increase of 456,504 sfh (17.54 percent) above current shading levels on this day. New shadows cast on the Big Green by the variant on this day would occur in the afternoon hours.

Tables 3.10-11 and 3.10-12 summarize shadow conditions on the Big Green.

(Revised) **Table 3.10-6 3.10-11: Big Green—Shadow Impacts**

	Annual Shading (sfh)	Annual Shading (% of TAAS)
Existing Conditions	817,661 <u>139,703</u>	0.09 <u>0.02</u> %
Proposed Development	132,875,433 <u>90,932,382</u>	14.56 <u>11.11</u> %
Net New Shading	132,057,772 <u>90,792,679</u>	14.47 <u>11.09</u> %

Note: sfh = square foot-hours; TAAS = Theoretical Available Annual Sunlight  
Source: San Francisco, ~~2017~~ 2018

(Revised) **Table 3.10-7 3.10-12: Big Green—Day of Maximum Shading**

Date(s) when maximum new shading occurs	December <del>27</del> <u>26</u>
Percentage net new shading on date(s) of maximum shading	<del>19.57</del> <u>17.54</u> %
Total net new shading on date(s) of maximum shadow	<del>567,336</del> <u>456,504</u> sfh

Source: San Francisco, ~~2017~~ 2018

**Table 3.10-8: Big Green—Time and Date of Maximum Shading**

Time and date when maximum new shading occurs	January 1, 4:00 p.m.
Percentage net new shading on time and date of maximum shading	56.53%
Total net new shading on time and date of maximum shadow	138,637 sq. ft.

Note: sq. ft. = square feet  
Source: San Francisco, 2017

The shadow diagrams provided in Figures 3.10-2 through 3.10-14 provide a visual representation of the new shadows cast on the Big Green by the variant's buildings and structures on 5 representative days of the year. Figures showing results on an hourly basis, starting 1 hour after sunrise and ending 1 hour before sunset, are provided in Appendix I and summarized for the days below. The shadow conditions under the variant on five representative days of the year are summarized below.

- *Vernal/autumnal equinox, March 21/September 21:* New shadows would be cast on the Big Green all day long, starting at 7:10 8:10 a.m., predominantly on the southern portion of the Big Green. The maximum net new shadow would occur at ~~5:15~~ 6:15 p.m.

- *Summer solstice, June 21*: New shadows would be cast on the Big Green all day long, with the minimum net new shadow occurring at 1:15 12:00 p.m. and the maximum at 6:30 7:15 p.m., principally on the southwest and southeast portions of the Big Green.
- *Winter solstice, December 21*: The Big Green would be exposed to new shadows all day long, with a minimum net new shadow occurring at 12:45 12:30 p.m. and the maximum at 3:45 p.m., covering the majority of the north and northeast portions of the Big Green.
- *“Worst-case” shadow day, December 27 26*: The worst day of the year, in terms of overall sfh of net new shadow cast on the Big Green by the variant, has been identified to be December 27 26. ~~The maximum net new shadow cast on the India Basin Open Space by the variant’s buildings and structures would occur at 3:45 p.m.~~
- ~~*“Worst case” shadow time and day for the Big Green, January 1, 4:00 p.m.*: This figure represents the moment when net new shadow cast on the Big Green by the variant’s buildings and structures would reach its maximum area.~~

Under either the proposed project or the variant, the majority of the Big Green would be composed of grasslands, stormwater bioretention ponds, swales, planters, a wet meadow, and groves of trees. The Big Green would also include some children’s play areas, a fitness loop, small gathering spaces, pedestrian-focused pathways, streets, and plazas. Additional shadow on this area would be cast on this space, which could have the potential to negatively affect users of this space. As stated above, shadow cast on this space would be the worst during the winter (~~December 27 and January 1~~), when park uses would likely be more active (walking or jogging) than passive (sitting, reading, gathering, or children playing) because of the cold, rainy weather and fewer hours of daylight. Active uses are less likely to be negatively affected by shadow, as users engaging in these types of uses (walking or jogging) would spend less time in shaded areas because they would be moving through the open space rather than passively sitting. Moreover, the Big Green is currently vacant and is not an existing park. As such, shadows cast on the Big Green would not constitute an impact under CEQA.

- \* Footnote 5 on Draft EIR p. 3.10-22 has been revised as part of the text changes introduced above:

<sup>5</sup> India Basin Open Space ~~property~~ is 6.2 acres (270,072 sq. ft.). The square footage used in the shadow analysis (~~287,334~~319,111 sq. ft./7.33 acres) includes rights-of-way within the park boundary. The rights-of-way are not under the jurisdiction of the Recreation and Park Commission, but they were included in the shadow analysis so that the entire park could be analyzed as a single functional area.

- \* A new footnote has been added as part of the text changes introduced above:

New Footnote 2 The 900 Innes property is 2.4 acres (104,544 sq. ft.), including submerged areas: 1.8 acres are dry land and 0.6 acre is submerged. The square footage used in the shadow analysis (88,613 sq. ft./2.03 acres) includes dry land and rights-of-way within the park boundary. The rights-of-way are not under the jurisdiction of the Recreation and Park Commission, but they were included in the shadow analysis so that the entire park could be analyzed as a single functional area.

- \* The following new reference has also been added to Draft EIR Section 3.10, “Shadow,” on pp. 3.10-22–3.10-25:

BMT. 2018. *Project No. 432301, India Basin Shadow Study*. San Francisco, CA. Planning Department Case No. 2014-002541ENV. [Prepared by BMT Fluid Mechanics, on behalf of Build, Inc., for purposes of Section 295 of the San Francisco Planning Code]

- \* The following references have been replaced or updated in Draft EIR Section 3.10, “Shadow,” on p. 3.10-30:

~~San Francisco, City and County of (San Francisco). 1989 (February 3). “Proposition K, The Sunlight Ordinance.” Memorandum from San Francisco Planning Department to San Francisco Planning Commission and Recreation and Park Commission. San Francisco, CA.~~

San Francisco Recreation and Parks District (RPD). 2018. *Prop K – The Sunlight Ordinance*. Available: [http://sfrecpark.org/wp-content/uploads/Item-2-858-Stanyan\\_AttachmentA\\_1989MemoOverview-060618.pdf](http://sfrecpark.org/wp-content/uploads/Item-2-858-Stanyan_AttachmentA_1989MemoOverview-060618.pdf). Accessed July 9, 2018.

~~———. 19962014. *San Francisco General Plan*. Recreation and Open Space Element. San Francisco, CA.~~

### ***Section 3.12, “Utilities and Service Systems”***

The following text changes have been made to Draft EIR Section 3.12, “Utilities and Service Systems,” on p. 3.12-18:

#### ***India Basin Shoreline Park and 900 Innes Properties***

Wastewater from the India Basin Shoreline Park and 900 Innes properties would be generated by restroom use (flows and flushes) and food vendor concession operations and would be discharged directly to the City’s sewer system.

- \* The following text is added after the last paragraph on Draft EIR p. 3.12-20:

In the event that Wastewater Scenario 2 (an on-site wastewater treatment facility) is implemented, the enviromental impacts related to odors associated with this scenario are addressed under Impact AQ-4.

- \* The following text is added before Impact UT-3 on Draft EIR p. 3.12-24:

In the event that Wastewater Scenario 2 (an on-site wastewater treatment facility) is implemented, the environmental impacts related to odors associated with this scenario are addressed under Impact AQ-4.

- \* Text in the first paragraph under the heading, “Operation,” on p. 3.12-25 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

#### ***Operation***

The proposed project includes up to ~~4,240~~ 1,575 residential units and ~~275,300~~209,106 gross square feet of retail, commercial, or flex space. These uses would create increased demand for potable water. Two potential scenarios were analyzed to determine the associated potable- and nonpotable-water demands (BKF, 2018):

- \* The following references have been removed, replaced or revised in Draft EIR Section 3.12, “Utilities and Service Systems,” on p. 3.12-30:

BKF Engineers (BKF). 2016 (~~November 2~~July 18). *India Basin—Water Demands*. Memorandum.

~~\_\_\_\_\_ . 2016c (July 20). *India Basin—Storm Drain Infrastructure* Memorandum. Prepared for BUILD-San Francisco, CA.~~

### ***Section 3.13, “Public Services”***

- \* The impact analysis in Impact PS-2, on p. 3.13-9 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

#### ***India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties***

Recreational, commercial, and institutional facilities are proposed for the India Basin Shoreline Park, 900 Innes, and India Basin Open Space properties. Development of the 700 Innes property would support approximately ~~3,400~~4,316 residents and ~~924~~706 employees under the proposed project, or 1,371 residents and 3,530 employees under the variant. Development of the 700 Innes property would also result in a new kindergarten through 8th grade (K–8) school under the variant only. An increase in use by recreationists, employees, students, and residents would increase the demand for police protection at the project site.

- \* Text on p. 3.13-10 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

#### ***700 Innes Property***

SFUSD has adopted a student generation rate of 0.25 student per dwelling unit (SFUSD, 2015). A total of ~~1,240~~1,575 residential units would be developed under the proposed project, resulting in the need to accommodate approximately ~~310~~494 K-12 students in local schools. By contrast, 500 residential units would be developed under the variant, and at least 125 K-12 students would need to be accommodated in local schools. This analysis conservatively assumes that none of the school-age residents associated with the proposed project or variant are already enrolled in an SFUSD school and that none would enroll in private school.

A 50,000-square-foot K-8 school that could serve approximately 450 students is proposed as part of ~~both the proposed project and the variant~~only. The proposed school is anticipated to serve both the residents of the project site and school-age children from the surrounding community. Because the total combined number of elementary, middle, and high school students generated by the ~~proposed project or variant~~ would be less than the capacity of the proposed K–8 school, the capacity of the proposed school would be adequate to serve all elementary and middle school students generated by the ~~proposed project or variant~~.



- \* The following text changes have been made to Draft EIR Section 3.13, “Public Services,” on p. 3.13-11, based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

**Overall Impact Conclusion**

Because a new school could serve all K-8 students associated with the ~~proposed project or~~ variant, and because the project sponsor would be required to pay fees to SFUSD, the operational impacts related to provision of school services under the proposed project or variant would be *less than significant*. No mitigation measures are necessary.

The following text changes have been made to Draft EIR Section 3.13, “Public Services,” on p. 3.13-11:

The additional residents generated by the proposed project or variant would likely be accommodated by the Bayview Linda Brooks-Burton Branch Library and other branch libraries in the vicinity (Hayes, pers. comm., 2016). Funding for library services and facilities comes from voter-approved bond measures and the General Fund, which receives revenue from a range of sources, including property taxes. The proposed project or variant would contribute to library funding through property taxes ~~and development fees~~ that would be proportionate to the increased demand in library services.

- \* The impact analysis in Impact-C-PS-1, on p. 3.13-12 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

SFFD, SFPD, SFUSD, and SFPL would be able to accommodate the additional demand for public services that would be generated by the cumulative projects. The Candlestick Point–Hunters Point Phase II Shipyard Development Project EIR considered construction of a new SFFD station and reconfiguration of the existing SFPD Bayview Station and/or construction of a new SFPD facility as part of that project. Because of the proximity of the Hunters Point Shipyard to the project site, it is likely that staff members from these SFFD and SFPD facilities, when constructed, would also serve the project site (Rivera, pers. comm., 2017; Sainez, pers. comm., 2017). If the AWSS is extended to the Candlestick Point–Hunters Point development, and in doing so provides infrastructure along Innes Avenue, such an extension would benefit the proposed project or variant by providing additional firefighting water infrastructure available for use at the project site. This source of firefighting water infrastructure would supplement the on-site fire suppression infrastructure at the project site constructed as part of the proposed project or variant. The ~~proposed project or~~ variant would include a new school that would serve the future residents of the 700 Innes property as well as existing and future San Francisco residents. In addition, RPD and BUILD would be required to pay development impact fees to fund staffing and facilities at SFUSD schools and SFPL branches. For these reasons, the cumulative impact related to public services would be *less than significant*. No mitigation measures are necessary.

### ***Section 3.14, “Biological Resources”***

To clarify the extent to which India Basin provides suitable open water habitat the following revisions have been made to Impact BI-4 in Draft EIR Section 3.14, “Biological Resources,” on p. 3.14-53:

#### ***Construction***

*India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties*

#### Migratory Birds

~~Because the project site and surrounding areas are highly developed and disturbed, the San Francisco shoreline in the project area does not provide a movement corridor for terrestrial wildlife. Open water, and mudflat habitats along the shoreline provide stopovers for migratory shorebirds birds, including but not limited to ducks, geese, and grebes along the Pacific Flyway, a major migration route in North America. Despite this important habitat for migratory birds, the current condition of the project area is primarily developed and disturbed, offering only low quality habitat for birds to forage and nest. San Francisco Bay, including open water and mudflat habitat in India Basin, is a known overwintering site for shorebirds. As discussed previously in Impact BI-1a, construction of the project may affect the ability of migratory birds to forage, nest, or stop over in the project vicinity, because habitat would be temporarily removed and both noise levels and human presence would increase. This would be particularly true for shorebirds during the migration season, between November and March. The construction impact of the proposed project or variant on migratory birds and their corridors could be significant.~~

Mitigation Measure M-BI-1e, “Avoid Nests during Bird Nesting Season,” presented above would be implemented under either the proposed project or variant to reduce this significant impact of construction at any of the project site properties on migratory birds nesting in the project area. This measure would require nesting bird surveys and construction buffers for active nests. Temporary removal of habitat for migratory birds would be primarily offset by the creation or restoration of sensitive natural communities at a ratio of no less than 1:1 and the additional replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland. Adding this tidal marsh habitat along this section of shoreline would improve habitat connectivity between patches of tidal marshland to the north and south, and would strengthen the Bay’s shoreline as a corridor for migratory birds. ~~Implementing Mitigation Measure M-BI-1e Temporary removal of habitat for migratory birds would be primarily offset by the creation or restoration of sensitive natural communities at a ratio of no less than 1:1 and the additional replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland. Adding this tidal marsh habitat along this section of shoreline would improve habitat connectivity between patches of tidal marshland to the north and south, and would strengthen the Bay’s shoreline as a corridor for migratory birds. Implementing Mitigation Measure M-BI-1e would reduce the construction-related impact of either the proposed project or the variant on migratory birds nesting in the project area to less than significant with mitigation.~~

Per Mitigation Measure M-BI-1c, “Prepare and Implement a Vegetation Restoration Plan and Compensatory Mitigation,” the proposed project or variant would be required to create or restore sensitive

natural communities at a ratio of no less than 1:1 and replace approximately 0.64 acre of existing shoreline (primarily disturbed or developed) of the project site with tidal marshland. Also, per Mitigation Measure M-BI-1e, "Avoid Nests during Bird Nesting Season," the proposed project or variant would be required to either avoid the nesting season (February 1 through August 31) or prepare preconstruction surveys for purposes of identifying and avoiding nesting birds prior to such construction. Implementation of these mitigation measures would reduce the construction-related impact of either the proposed project or the variant on migratory birds nesting at the project site and in the surrounding area to *less than significant with mitigation.*

#### Migrating Marine Mammals, Fish, and Their Corridors

As discussed previously, underwater noise from construction could result in temporary removal of open water and tidal marsh habitat for marine mammals and fish species. Harbor seals, California sea lions, and various fish species forage throughout the Bay. Therefore, underwater noise from construction could cause marine mammals to avoid the project area while migrating to or from haul-out sites or during foraging, and could cause fish to avoid the project area during foraging. The construction impact of the proposed project or variant on migrating marine mammals, fish, and their corridors could be significant.

Although in-water work has the potential to affect the behavior of migrating species, construction activities and structures in the water would not act as physical barriers to migration. With Mitigation Measure M-BI-1a, "Prepare and Implement a Hydroacoustic Monitoring Program for Special-Status Fish and Marine Mammals," a hydroacoustic monitoring program for special-status fish and marine mammals reviewed and approved by NMFS would minimize impacts of underwater noise on these species. In addition, because the existing habitat on these properties is degraded and a relatively large amount of surrounding open water habitat is available, the temporary removal of aquatic habitat for fish and marine mammals in the project vicinity is unlikely to impede fish or marine mammal movement up or down the shoreline. Furthermore, as discussed for migratory birds, temporary removal of habitat for marine mammals and fish would be primarily offset by the creation or restoration of sensitive natural communities at a ratio of no less than 1:1 and the additional replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland.

Implementation of Mitigation Measures M-BI-1a and M-BI-1e, the restoration of temporarily affected habitats at a 1:1 ratio, and the additional creation of 0.64 acre of tidal marshland would reduce the construction-related impact of either the proposed project or the variant on wildlife corridors to *less than significant with mitigation.*

#### ***Operation***

##### *India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties*

Birds have the potential to collide with the newly constructed buildings on the project site. Adding open space areas adjacent to developed areas would create bird habitats near proposed buildings and other facilities, potentially increasing risks of bird collisions. Newly constructed buildings would be in compliance with the adopted Standards for Bird-Safe Buildings, as required by Section 139 of the

Planning Code. The Standards for Bird-Safe Buildings include requirements for façades, glazing, and lighting to prevent bird collisions. Therefore, operation of the proposed project or variant would not adversely affect resident or migratory birds by increasing the risk of collisions with new buildings or structures.

The proposed project or variant would result in additional lighting that could have a significant impact on migrating birds. Lighting in the project would comply with Standards for Bird-Safe Buildings, as required by Section 139 of the Planning Code, and would follow the San Francisco Better Streets Plan. These documents identify requirements and recommendations for eliminating light pollution by minimizing perimeter and vanity lighting, filtering light, and designing light fixtures so that light does not escape upward. The elimination of unnecessary light pollution is anticipated to reduce the potential for lighting from the proposed project or variant to significantly impact migratory birds.

Following the construction of the proposed project or the variant, human presence along the shoreline at India Basin is anticipated to increase. In addition, with the inclusion of kayak launching for the proposed project or variant, human presence within open water habitat in India Basin would increase. Increased human presence and noise could have negative effects on migratory shorebirds, including ducks, geese, grebes, and other shorebirds in the project area. RPD on-water programming would occur between April and October, and therefore, would not overlap with the migration season. This would limit human disturbance of migrating shorebirds. Additionally, the replacement of approximately 0.64 acre of existing shoreline of the project site with tidal marshland would increase opportunities for migratory shorebirds to stop over at India Basin after implementation of the project. This additional tidal marsh would improve the quality of shorebird habitat within the project area, and would provide a buffer between human occupied areas (residential and recreational areas) and shorebirds habitat.

With the replacement of approximately 0.64 acre of existing shoreline with tidal marsh, compliance with Section 139 of the Planning Code, and implementation of seasonal suspension of on-water RPD programming; all four project site properties, operational impacts of either the proposed project or the variant on wildlife corridors would be *less than significant*. No mitigation measures are necessary.

Language has been integrated into the Operation section of Impact BI-5 in Draft EIR Section 3.14, “Biological Resources,” on pp. 3.14-54–3.14-55, with regard to lighting impacts on migrating birds; however, these revisions and clarifications do not change the analysis, conclusions, or mitigation measures of the Draft EIR. In addition, these changes would not increase the severity of any impacts on biological resources identified in the Draft EIR.

### ***Operation***

#### *India Basin Shoreline Park, 900 Innes, India Basin Open Space, and 700 Innes Properties*

Project operations under either the proposed project or the variant are not expected to result in the removal of trees regulated under the Urban Forestry Ordinance; therefore, project operations would not conflict with the Urban Forestry Ordinance. The proposed project or variant would result in additional lighting that could have a significant impact on migrating birds. Lighting in the project would comply with Standards for Bird-Safe Buildings, as required by Section 139 of the Planning Code, and would

follow the San Francisco Better Streets Plan. These documents identify requirements and recommendations for reducing light pollution by minimizing perimeter and vanity lighting, filtering light, and designing light fixtures so that light does not escape upward. The elimination of unnecessary light pollution is anticipated to reduce the potential for lighting from the proposed project or variant to significantly impact migratory birds. At all four project site properties, the operational impact of either the proposed project or the variant related to consistency with local biological protection plans and policies would be *less than significant*. No mitigation measures are necessary.

- \* The following reference has been revised in Draft EIR Section 3.14, “Biological Resources,” on p. 3.14-57:

National Marine Fisheries Service. 2007 (~~June~~August). *Report on the Subtidal Habitats and Associated Biological Taxa in San Francisco Bay*. Santa Rosa, CA.

### ***Section 3.15, “Hydrology and Water Quality”***

- \* The impact analysis in Impact HY-1, on p. 3.15-30 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

#### *Proposed Project*

Project construction would be the most intense at the 700 Innes property. At this property, the proposed project would involve constructing 1,240,157~~5~~ dwelling units and 275,330,209,106~~106~~ gross square feet (gsf) of retail, commercial, or flex space, ~~as well as a 50,000-gsf school~~, parking, and publicly accessible open space. Constructing these developments over several phases would involve removing vegetation, grading, trenching, and moving soil over numerous acres, all of which could result in erosion and sedimentation.

- \* Text on p. 3.15-40, in the operation section of Impact HY-1 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

#### *Proposed Project*

Residential and nonresidential development at the 700 Innes property would occur on primarily vacant, pervious lands. The proposed project is a residentially focused, mixed-use development that includes approximately 1,240,157~~5~~ dwelling units and 275,330,209,106~~106~~ gsf of ground-floor retail, commercial, or flex space. The proposed project would result in an increase in impervious area of 14.2 acres<sup>74</sup> over the 17.1-acre property, causing the property to be 93 percent impervious, compared to existing conditions in which 10 percent of the property is impervious. Implementing the proposed project would also result in intensification in uses and associated urban stormwater runoff. This change from pervious to impervious

<sup>74</sup> Existing impervious area on the property is 1.7 acres, and the proposed project would result in 15.9 acres of impervious area [15.9 acres - 1.7 acres = 14.2-acre increase in impervious area].

surface would cause an associated increase in urban stormwater runoff (69 percent increase in the runoff rate [Sherwood, 2016]), which can be a source of surface water pollution.

***Section 3.16, “Hazards and Hazardous Materials”***

- \* The second bullet under the heading, “700 Innes Property,” on p. 3.16-29 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:
  - Residential units and commercial office space, most retail uses, and the proposed school (variant only) would generally use relatively small quantities of hazardous materials, consisting mostly of household-type or janitorial cleaning products and maintenance products (e.g., paints, solvents, cleaning products).
- \* The impact analysis in Impact HZ-4, on p. 3.16-56 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

***India Basin Shoreline Park Property***

Under ~~either the proposed project or the variant~~, a kindergarten through 8th grade (K-8) school would be located on the 700 Innes property, which is within ¼ mile of the India Basin Shoreline Park property. However, because the proposed school would not open until after construction of the ~~proposed project or variant~~, emissions or handling of hazardous materials during construction would not affect this future school.

- \* The impact analysis in Impact HZ-4, on pp. 3.16-57–3.16-58 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

***900 Innes, India Basin Open Space, and 700 Innes Properties***

A K-8 school is included as part of the ~~proposed project and~~ variant (on the 700 Innes property). However, because the school would not be open until after construction, emissions or handling of hazardous materials during construction would not affect this future school. In addition, no schools are located within ¼ mile of the 900 Innes, India Basin Open Space, and 700 Innes properties. Therefore, construction under either the proposed project or the variant at the 900 Innes, India Basin Open Space, or 700 Innes properties would have *no impact* regarding hazardous emissions and handling of hazardous wastes on nearby schools. No mitigation measures are necessary.

- \* Text under the heading, “Use of Hazardous Substances,” on p. 3.16-58 of the Draft EIR, has been revised based on changes to the proposed project. Environmental effects of these changes are analyzed in Chapter 2, “Project Description Revisions and Clarifications, and the Revised Proposed Project,” of this RTC document. The changes to the Draft EIR are as follows:

### *Use of Hazardous Substances*

Under either ~~the proposed project or~~ the variant, a K-8 school would be located on the 700 Innes property, which is within ¼ mile of the India Basin Shoreline Park, 900 Innes, and India Basin Open Space properties. As discussed in Impact HZ-1, operation of the ~~proposed project or~~ variant at these three properties would involve the use, storage, transport, and disposal of hazardous materials and wastes, in small quantities. Therefore, the ~~proposed project or~~ variant could emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

The following text change has been made to the Draft EIR in Section 3.16, “Hazards and Hazardous Materials,” on p. 3.16-63:

The proposed project or variant would be built in conformance with the California and San Francisco fire codes, including necessary utility and access requirements for fire protection and emergency services. The project sponsors would seek PG&E approval to ~~Existing gas and electric and other utility infrastructure would be upgraded, resized, and located~~ Existing gas and electric and other utility infrastructure underground as part of the project. An assessment of the proposed project and variant with respect to local electrical distribution system reliability and capability was undertaken (Power Systems Design 2017), which concluded that the project should not negatively impact the local existing PG&E electric distribution system reliability and public health and safety, assuming the utilities (i.e., PG&E and SFPUC) perform their work and meet their obligations per their standards and CPUC requirements for reliable and safe system performance and operations. Therefore, the project is not anticipated to, and therefore would not ~~overtax existing overhead power lines along Innes Avenue in such a way that people or structures would be exposed to a significant risk of loss, injury, or death involving fires.~~

The following new reference has also been added to Draft EIR p. 3.16-67:

Power Systems Design. 2017 (November 27). India Basin Project, Local Electrical Distribution System Reliability and Capability Concerns. Letter to Ms. Victoria Lehman, BUILD.

Staff-initiated text changes have also been made to the following existing references.

- \* The third reference in the Draft EIR on p. 3.16-68, under Section 3.16.5, “References,” has been revised as follows:

———. 2017 (~~February 28~~June 12). Draft Site Mitigation Plan, India Basin, San Francisco, California. San Francisco, CA. Prepared by Langan Engineering and Environmental Services, Inc.

- \* The second reference in the Draft EIR on p. 3.16-69, under Section 3.16.5, “References,” has been revised as follows:

———. 2017a (~~February 28~~June 12). Site Mitigation Plan (Draft), India Basin Redevelopment Project, India Basin Shoreline Park, 900 Innes Avenue, India Basin Open Space, San Francisco, California. San Francisco, CA. Prepared by Northgate Environmental Management.





## **Attachment A: Planning Commission Hearing Transcript**



SAN FRANCISCO PLANNING COMMISSION  
COMMISSIONER CHAMBERS, ROOM 400  
CITY HALL, 1 DR. CARLTON B. GOODLETT PLACE  
SAN FRANCISCO, CA 94102

Thursday, October 19, 2017, 6:33 p.m.

ITEM 16

2014-002541ENV

INDIA BASIN MIXED-USE PROJECT DRAFT EIR

Reported by:  
Susan Palmer, CER 00124

APPEARANCES

COMMISSIONERS

Dennis Richards - Vice President  
Rodney A. Fong  
Joel Koppel  
Myrna Melgar

STAFF

Jonas Ionin - Secretary  
Michael Li  
Joy Navarrete

ALSO PRESENT

Kristen Jensen, Deputy City Attorney

SPEAKERS

Sheridan Noelani Enomoto, Greenaction  
Paul Jeremy  
Onki Kwan, Open Door Legal Services  
Dawn Ruggeroli  
Mikhail Brodsky, Founder, Archimedes Banya  
Abhishek Vaidya, Archimedes Banya  
Jesus Flores, Archimedes Banya  
Vladimir Rekovoff  
Philip Vitale, Trust for Public Land  
Kris Krishnaveni  
David Grossblatt  
James Fahey  
Ellsworth Jennison  
Roxanne Blank

Index

	<u>Page</u>
Item 16. 2014-002541ENV India Basin Mixed-Use Project Draft EIR	4
Certificate of Reporter	29
Certificate of Transcriber	30

1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

P R O C E E D I N G S

OCTOBER 19, 2017 6:33 P.M.

MR. IONIN: Commissioners, that will place us on Item 16 for Case Number 2014-002541ENV, the India Basin Mixed-Use Project at 700 Innes, 900 Innes, India Basin Open Space and India Basin Shoreline Park. This is a draft environmental impact report. Please note that written comments will be accepted at the Planning Department until 5:00 p.m. on October 30th, 2017.

MR. LI: Vice President Richards and members of the Commission, Michael Li, Planning Department staff. Today I am joined by Senior Environmental Planner Joy Navarrete, along with members of the project team including the EIR consultant and the project sponsors.

The purpose of today's hearing is to receive public comments on the Draft Environmental Impact Report for the India Basin Mixed-Use Project.

Through a public-private partnership, the San Francisco Recreation and Park Department and BUILD, a private developer, would redevelop 39 acres along the India Basin shoreline. The proposed project would include open-space facilities and parks, wetlands habitat, and a mixed-use urban village.

The Draft EIR analyzed two options for the mixed-use urban village. The residentially-oriented

1 option would include 1,240 dwelling units, approximately  
2 275,000 square feet of commercial space, and 1800 parking  
3 spaces.

4           The commercially-oriented option would include  
5 500 dwelling units, approximately one million square feet  
6 of commercial space, and a little more than 1900 parking  
7 spaces. Both options would include 50,000 square feet of  
8 institutional space.

9           The Draft EIR concluded that the proposed  
10 project would result in significant and unavoidable  
11 project level or cumulative impacts related to: Historic  
12 resources, transportation, noise, air quality, and wind.  
13 The Draft EIR also concluded that significant impacts  
14 related to aesthetics, archeological resources,  
15 recreation, utilities, biological resources, hydrology,  
16 and hazardous materials could be mitigated to less than  
17 significant levels.

18           A hearing to receive the Historic  
19 Preservation's comments on the Draft EIR was held on  
20 October 4th, 2017. The HPC has not yet submitted their  
21 comment letter, but at the October 4th hearing, the HPC  
22 concurred with the Draft EIR's analysis and conclusions  
23 related to historic resources. The HPC supports the  
24 proposed mitigation measures to address significant  
25 impacts on historic resources and agrees that the Draft

1 EIR analyzed an appropriate range of historic  
2 preservation alternatives.

3 Today's proceedings are being transcribed by a  
4 court reporter. I'd like to remind all speakers to state  
5 their names for the record and speak slowly and clearly  
6 so that the court reporter can produce an accurate  
7 transcript.

8 Comments should focus on the adequacy and  
9 accuracy of the information contained in the Draft EIR.  
10 The Planning Department will accept written comments on  
11 the Draft EIR until 5:00 p.m. on October 30th, 2017.  
12 After the close of the public comment period, the  
13 Planning Department will prepare a responses-to-comments  
14 document that will contain responses to all relevant  
15 comments on the Draft EIR received during today's hearing  
16 or submitted in writing by 5:00 p.m. on October 30th.

17 Thank you.

18 VICE PRESIDENT RICHARDS: Thank you.

19 Opening up to public comment.

20 MS. ENOMOTO: Good afternoon. My name is  
21 Sheridan Noelani Enomoto. I am with Greenaction for  
22 Health and Environmental Justice. I am a community  
23 advocate representing the diverse community of Bayview  
24 that will be affected by the building of the India Basin  
25 Mixed-Use Project.

O-GA1-1  
(GC-1)





1 I want to recognize actually Nicole Avril, who  
2 is with the Department, San Francisco Department of Parks  
3 and Recreation, who acknowledges that there is a  
4 subsistence fishing community that is fluent in Cantonese  
5 and are there at least once a week in India Basin; and  
6 also recognizing that there needs to also be a more -- a  
7 closer look at potential contaminants or hazardous  
8 contaminants in India Basin, considering its location  
9 adjacent or in proximity to the Bayview-Hunters Point  
10 Shipyard.

11 I also want to recognize in terms of language  
12 access, from the scoping period all the way till now it  
13 has not acknowledged the -- all of the communities  
14 including the limited or non-English-speaking community  
15 members that I just mentioned already in any of this  
16 process. In fact, the announcements and public hearings  
17 of this process have only been written in English.

18 So from this report I just want to acknowledge  
19 what I do agree with in the Draft Environmental Impact  
20 Report. I do agree that significant and unavoidable with  
21 mitigation Impact AQ-1, "The proposed project or variant  
22 would generate emissions of criteria pollutants and  
23 precursors during construction, operations, and  
24 overlapping construction operated activities that could  
25 violate an air quality standard, contribute substantially

O-GA1-  
1  
cont'd  
(GC-1)

O-  
GA1-2  
(AQ-1)

1 to an existing or project air quality violation, or  
2 result in a cumulatively considerable net increase in  
3 criteria pollutants." I agree.

O-  
GA1-2  
cont'd  
(AQ-1)

4 Impact AQ point -- or dash 3, "The proposed  
5 project or variant would generate emissions that could  
6 expose sensitive receptors to substantial pollutant  
7 concentrations, significant and unavoidable with  
8 mitigation." Correct.

9 Impact C-AQ-2, "The proposed project or  
10 variant, in combination with past, present, and  
11 reasonable-foreseeable future development in the project  
12 area, would contribute to cumulative health risk impacts  
13 to sensitive receptors." I also agree with that.

14 I disagree when it comes to Impact PH-1 or  
15 further regarding the population and growth. If you're  
16 going to have housing that's 500, option of housing  
17 dwelling for 500, whether you're building 500 or 1240, it  
18 will have a detriment to the population and growth.

O-  
GA1-3  
(PH-1)

19 Overall, I believe that this process does not  
20 include all communities; it is not inclusive to all  
21 communities; and, as stated in this Report, it has a  
22 negative impact on the environment.

O-  
GA1-4  
(GC-1)

23 Thank you.

24 VICE PRESIDENT RICHARDS: Thank you.

25 MR. PAUL: Thank you, Vice President Richards.

I-Paul-  
1  
↓(CR-1)

8

1 Thank you, Mr. Li, from the Planning Department. My name  
2 is Jeremy Paul. I have spent quite a bit of time over  
3 the years at this podium, but I have spent almost as much  
4 time at the Archimedes Banya, often wearing one of these.  
5 This is a sauna hat, it's a Russian sauna hat. So I'm  
6 going to put that on as my prop -- no, I'm not.

7 Archimedes Banya is the -- it's a cultural  
8 institution on the 700 block of Innes Street. It is  
9 surrounded on three sides by the development area.  
10 Archimedes Banya doesn't seek to stop this development,  
11 but we do seek to be included in the Environmental Impact  
12 Report. This is an important cultural institution to a  
13 lot of people. It's one of the most diverse communities  
14 I've ever been a part of in San Francisco. Racially,  
15 ethnically, age wise, economically, everyone there is  
16 there at the Banya and most of them are just wrapped in a  
17 towel.

18 The problem is this, that there are several  
19 different proposals for what will actually be done if  
20 this zoning change is approved. This organization does  
21 not have the resources to D.R. and fight design review  
22 over each individual project that may be surrounding it  
23 subsequent to the zoning change. So we're asking that  
24 this developer include in this Draft EIR the studies of  
25 the potential impacts on the Archimedes Banya as a

1 cultural institution.

2 I mean there is going to be shadows, there is  
3 going to be traffic impact, there is going to be smell,  
4 there is going to be noise. We don't really know what  
5 those things are. And I think it's incumbent upon this  
6 developer that's proposing this to include in their EIR  
7 studies that will help the Banya figure out what it  
8 really needs to be successful after this development is  
9 built.

10 This is a fragile institution and it doesn't --  
11 it's not a successful business. It employs close to 40  
12 young people that work there, most of them live in the  
13 area. We had a very large crowd earlier, but after the  
14 second -- the second round of 200 speakers on cannabis  
15 issues, a lot of them had to cut out on us. But I'm  
16 going to ask anybody who's here for -- on behalf of the  
17 Archimedes Banya to stand up and show your presence in  
18 asking this Commission to see that the Banya is protected  
19 in this EIR. Thank you.

20 (Many audience members stand.)

21 VICE PRESIDENT RICHARDS: Thank you.

22 Next speaker, please.

23 MS. KWAN: Good evening, Commissioners. My  
24 name is Onki Kwan and I'm an attorney at Open Door Legal.  
25 Open Door Legal is located in Bayview-Hunters Point and

I-Paul-1  
cont'd  
(CR-1)

I-Paul-2  
(GC-2)

I-Paul-3  
(GC-2)

O-  
ODL2-1  
(CR-1)

1 our core service area is Bayview-Hunters Point. So it's  
2 extremely important to us that the cultural and  
3 historical fabric of the community is preserved.

4 The Banya is located at 748 Innes and it's at  
5 the center of the proposed project. The EIR doesn't  
6 mention the project even once; however, it must be  
7 considered if it meets the definition of a historical  
8 resources.

9 Under the California Code of Regulations, a  
10 historical resource is any building, structure, site,  
11 area, or place which a leading agency determines to be  
12 historically significant. A resource is historically  
13 significant if at least one of the following criteria are  
14 met: It's associated with events that have made a  
15 significant contribution to the broad patterns of  
16 California's history and cultural heritage; is associated  
17 with the lives of persons important in our past; embodies  
18 the distinctive characteristics of a type, period,  
19 region, or method of construction; or represents the work  
20 of an important creative individual; or possesses high  
21 artistic values; or has yielded or may likely to yield  
22 important information in prehistory or history.

23 The Banya meets several of these  
24 characteristics. The Banya has yielded or may likely  
25 yield information important in history or prehistory.

1 The history of bathing spans several millennia and spans  
2 different cultures, including European, Middle Eastern,  
3 and Asian cultures. This is reflected in the Banya's  
4 customer base which, as you've heard earlier, are very  
5 diverse, and they openly share their bathing rituals with  
6 each other. This is also reflected in the Banya's  
7 architecture, which takes influence from ancient bathing  
8 traditions. And the Banya also makes a concerted effort  
9 to educate patrons on the history of bathing.

10           The Banya is associated with the lives of  
11 persons important in our past. The full name of the  
12 Banya is Archimedes Banya. It's named after Archimedes  
13 because Archimedes isn't only the greatest mathematician  
14 of all time but he also made the revelation that the best  
15 ideas arise when you're relaxed in a hot bath, and we  
16 often forget that. The Banya reminds everyone of this  
17 and it encourages visitors to experience this for  
18 themselves.

19           The Banya also embodies the distinctive  
20 characteristics of a type, period, region, or method of  
21 construction, and possesses high artistic values. It's  
22 constructed based on ancient bathing rituals and it takes  
23 its influence from Greek, Turkish, German, and Russian  
24 traditions. When you enter the Banya you enter into this  
25 ancient world of bathing. And anyone who goes there can

1 see their artistic values.

2 MR. IONIN: Thank you, Ms. Kwan. Your time is  
3 up.

4 VICE PRESIDENT RICHARDS: Thank you.

5 Next speaker, please.

6 MS. RUGGEROLI: Good evening. Thank you for  
7 letting me take a few minutes. My name is Dawn  
8 Ruggeroli. And I actually own one of the condo units in  
9 the Banya building and I face out into the water.  
10 When the Banya was built, we actually abided by  
11 the zoning regulations that were required. And all we  
12 ask, all I ask is that our building be included in this  
13 Environmental Impact Report and that it be -- that the  
14 people that are putting this together follow the same  
15 regulations that we were required to follow. And we --  
16 it is imperative that we be included in this, because we  
17 need to know how we're impacted and what the impact will  
18 be down the road. Thank you very much.

19 VICE PRESIDENT RICHARDS: Thank you.

20 Next speaker, please.

21 MR. BRODSKY: Good evening, Commissioners. My  
22 name is Mikhail Brodsky. I am the founder of Banya,  
23 Archimedes, Archimedes Banya. I also own one of the  
24 units there, a residential unit.

25 But, first of all, thank you very much for this

O-  
ODL2-1  
cont'd  
(CR-1)

I-Ruggeroli-  
1  
(GC-2)

I-  
Brodsky-1  
(GC-2)

1 proceeding. I am really impressed with your endurance.  
2 Even with training in Banya, I don't know if I could do  
3 it the whole day.

4           Anyway, I bought this lot together with two of  
5 my partners in 1999. At that time nobody wanted to buy  
6 this lot. It was like dead area around. And all the  
7 friends around me, all the people that were saying that  
8 I'm crazy trying to build something public, and until  
9 this moment it is the only public business where people  
10 are coming from other places. But the people are coming  
11 not just from San Francisco, they're coming from  
12 everywhere in the world now, including, you know, of  
13 course the whole Bay Area, Sacramento, Monterey, Los  
14 Angeles, but it's London, New York, from everywhere.

15           But it's not my point. You see, during this  
16 construction, it took 12 and a half years, we had two  
17 public hearings in this building. And, you know, the  
18 construction was going very difficult. I needed also an  
19 environmental report at this moment and I was the first  
20 one who did this environmental report. And, you know,  
21 there were many obstacles. Finally it's done. And,  
22 eventually, reading the new report, I found that we don't  
23 exist and this is kind of strange, this shrugging.

24           So you know I know about this area more than a  
25 majority of the people. I know the soil, I know the



1 density of this landfill, I know what can happen with the  
2 water filtering through this landfill, I know what kind  
3 of foundations can be built here. I know everything.  
4 And, by the way, I am a mathematician, an applied  
5 mathematician with a Ph.D. in geophysics.

I-Brodsky-1  
cont'd  
(GC-2)

6 So I'm kind of surprised how the huge change of  
7 the zoning, which is basically undermining the position  
8 of the previous Commission which assigned the zoning  
9 before, like industrial, can ignore part of the property.  
10 There are several parts of the property, including ours,  
11 and a couple of other buildings which are totally  
12 ignored. They don't exist in this Environmental Impact  
13 Report. So it's like it's an empty land, and it's not an  
14 empty land. There are people living there, there are  
15 people working there, and there are people which are  
16 coming from other places to this place.

I-  
Brodsky-2  
(GC-2)

17 So my suggestion is it should be a real serious  
18 observation of what should be included in the report.  
19 I'm not talking about certain scientific parts which are  
20 out of any critics because they don't have proper  
21 citations and they are just basically a manipulation of  
22 the data. I can -- I can do it. But you know it's huge.  
23 It's been, what, a thousand-pages report, which nobody  
24 can do -- nobody can write a real complaint to that in  
25 one month.

I-Brodsky-  
3  
(GC-3)

1 Thank you.

2 VICE PRESIDENT RICHARDS: Thank you.

3 Next speaker, please.

4 MR. VAIDYA: Sirs, ma'am, my name is Abhishek  
5 Vaidya. I am the general manager of Archimedes Banya. I  
6 would like to just give you some brief overview.

7 We have been in operation in this business for  
8 five years. We started this business with having less  
9 than 20 employees and having less than 500 customers a  
10 week, but now, five years fast-forward, we have got over  
11 50 employees and 1200 customers a week. So, you know, if  
12 I would not be speaking here today I would be doing a  
13 disservice to my employees. All I care about are my  
14 employees and my customers.

15 Please, you guys should not forget us in the  
16 Environmental Report. It's not just 50 -- 40 to 50  
17 employees we're talking about, we're talking about 40 to  
18 50 different families over here and mostly all from the  
19 Bayview area. So I would just like to be considered in  
20 this Environmental Report, yeah. Thank you very much.

21 VICE PRESIDENT RICHARDS: Thank you.

22 Next speaker, please.

23 MR. FLORES: Hello. My name is Jesus Flores.  
24 I'm also a facilities manager at Archimedes Banya. I'm  
25 here to discuss with the issue of the EIR in regards to

I-  
Brodsky-3  
cont'd  
(GC-3)

I-  
Vaidya-1  
(GC-2)

I-Flores-  
1  
(GC-2)

1 Archimedes Banya that we are not included into the  
2 report. I am here to argue that we write under the  
3 addendum and include Archimedes Banya as well.

4 Archimedes Banya has been in operations for the  
5 past five and a half -- five years and ten months. I am  
6 fortunate to have lived and worked there, and have seen  
7 the community grow year after year. We have been able to  
8 provide our customers with great service and an amazing  
9 experience. We offer a unique aspect at Archimedes  
10 Banya. We are co-ed and in some parts we are clothing  
11 optional.

12 When customers come to Archimedes Banya they  
13 are given a space to heal the body and mind, as we  
14 socialize friends -- as they also socialize with friends.  
15 Not only can people relax inside our facilities but can  
16 also take time to visit our terrace, bar, or roof deck.

17 Because of the EIR, they are not taking into  
18 consideration that we are in existence. For example, in  
19 Table 3.1-1, there is a list of existing buildings on the  
20 project site and Archimedes Banya is not included.

21 Throughout the building they will also have  
22 various activities that we offer, yoga and qigong. So  
23 during construction, they will also take into effect.

24 But also you have to take into consideration the height -  
25 - height restrictions that are currently imposed, which

I-  
Flores-1  
cont'd  
(GC-2)

I-Flores-  
2  
(LU-2)  
↓

1 is Zone M-1 and an NC-2 which offer 40 foot height. I  
2 would not recommend switching the current zoning to a  
3 special-use district because it can impede the views.  
4 And under the California Environmental Quality Act, the -  
5 - California requires that the State take all action  
6 necessary to provide the people of the state with the  
7 enjoyment of an aesthetic, natural scenic, and historic  
8 environment.

I-Flores-  
2  
cont'd  
(LU-2)

9 So I ask that you take into consideration in  
10 putting Archimedes Banya into the report. Because you  
11 also have pictures of Key Viewpoints, specifically Number  
12 9 and Number 6 in the document, which show the street,  
13 and it is not accurate to tell how customers we have who  
14 come to our facilities. That street in your Key  
15 Viewpoints only show about five to six cars, when on a  
16 daily basis we have about a hundred. We have various  
17 people coming to our facility, and they take the time to  
18 relax and enjoy themselves there. So I strongly urge you  
19 to include us into the report as well. Thank you.

I-  
Flores-3  
(AE-1)

20 VICE PRESIDENT RICHARDS: Thank you.

21 Next speaker, please.

22 MR. REKOVOFF: Good evening, Commissioners.  
23 Good evening, Committee. My name is Vladimir Rekovoff  
24 (phonetic). I am a resident of Santa Cruz, and just a  
25 few words about this place.

I-  
Rekovoff-1  
(ME-2)

1           It is absolutely, from my opinion, a unique  
2 place. Because I have some -- a lots of experience with  
3 different places, even in Santa Cruz we have a beautiful  
4 place, but this one, absolutely a unique place. Like I  
5 say, very friendly. Staff, very kind people, and amazing  
6 food actually in buffet. It's like really homemade food.  
7 But it's all details.

8           But like what I say, what I want to say in  
9 general, it's a -- there will be big changes if something  
10 will happen around Banya and it's not good, I don't think  
11 so, for patrons like me, thousands of patrons, because  
12 it's a growing business. It's a very successful  
13 business, a very beautiful building, how it's designed,  
14 everything. So it's -- I think we will be very sad if  
15 something would happen, and so I'm completely opposed,  
16 like with my hundreds of friends, and I not recommended  
17 it to do anything -- I mean to develop this area. Okay.  
18 Thank you very much.

19           VICE PRESIDENT RICHARDS: Thank you.

20           Next speaker, please.

21           MR. VITALE: Good evening, Commissioners. I'm  
22 Philip Vitale with the Trust for Public Land. We're a  
23 national organization that believes that everybody in  
24 America deserves a high quality park and green space  
25 within a ten-minute walk. I'm here to speak in support

I-  
Rekovoff-1  
cont'd  
(ME-2)

O-  
TPL-1  
(ME-1)

1 of the India Basin Shoreline Park and 900 Innes Project.

2 We have worked with San Francisco for more than  
3 40 years and are proud to partner, do partnering with Rec  
4 and Park, San Francisco Parks Alliance and BUILD, Inc.,  
5 to renovate the existing India Basin Shoreline Park and  
6 transform the former boatyards of Vine and 900 Innes into  
7 an amazing waterfront park.

8 Shortly after the City acquired the 900 Innes  
9 site, our organization joined efforts to engage the  
10 community around the transformation of the India Basin  
11 Waterfront. This started with by forming a mayoral-  
12 appointed task force comprised of community groups such  
13 as Hunters Point Families, Parks Line Pro 124, the Sierra  
14 Club, the Audubon Society, Young Community Developers,  
15 and many more.

16 Working closely with the task force, we  
17 developed a waterfront study which identified appropriate  
18 programs and amenities in the seven basin sites. We  
19 followed that with an ideas competition for the India  
20 Basin Shoreline Park and 900 Innes, which a jury, which  
21 was comprised of community members and technical  
22 professionals, selected the firm of GGN, and we continued  
23 engaging the community through focus groups, community  
24 meetings, attending events and fairs and inform -- that  
25 informed the concept design. And then we feel that the

1 design represents the varied interest of the community  
2 and we're excited by the passionate engagement of the  
3 community in the design and look forward to further  
4 engaging the community in the next phases as this design  
5 progresses.

O-  
TPL-1  
cont'd  
(ME-1)

6 VICE PRESIDENT RICHARDS: Thank you.

7 MR. IONIN: I'd like to take this opportunity  
8 to remind members of the public that this is your  
9 opportunity to not speak to the project but, rather, to  
10 the Draft Environmental Impact Report and its accuracy.  
11 So next speaker, please.

12 MR. KRISHNAVENI: Hi. My name is Kris  
13 Krishnaveni, and I would like to do exactly that. I am a  
14 long-time customer and supporter of the Banya and I want  
15 to talk a bit about the EIR.

I-Krishnaveni-  
1  
(GC-2)

16 So an environmental impact report, by  
17 definition, needs to discuss the impacts on the  
18 surrounding area. Well, Archimedes Banya will be  
19 surrounded on three sides by this project. It's been  
20 open since 2011. It's one of the main uses on Innes  
21 Avenue and it is not mentioned once in this thousand-page  
22 report.

23 At one point in the report there is a picture  
24 of it, but it's described as a residential building. So  
25 I think that this EIR must be revised in order to

1 incorporate the Banya. And the developer needs to work  
2 with the Banya respectfully to lessen the impact on the  
3 facility, which for me has become a home away from home.  
4 And I believe that's true with many of the other people  
5 that are here and many of the other customers. And I  
6 hope you will take that into consideration. Thank you  
7 very much.

I-  
Krishnaveni-1  
cont'd  
(GC-2)

8 VICE PRESIDENT RICHARDS: Thank you.

9 Next speaker, please.

10 MR. GROSSBLATT: Hello. Thank you very much.

11 My name is David Grossblatt. I live down the street from  
12 this project, so it will have a direct and big impact on  
13 my life. I live with my two children, a nine-year-old  
14 and a seven-year-old, as well as my wife.

I-Grossblatt-  
1  
(CR-1)

15 Today I definitely want to talk about the fact  
16 that the Banya is very important to me and my children  
17 and my family. I have a mixed family, Asian and Russian,  
18 and the Banya is truly an amazing opportunity for my  
19 family to reconnect with our roots. I have taken my  
20 children there. It teaches us a lot about people from  
21 all over the world, my children as well, and all the  
22 types of people and the way people are in San Francisco.  
23 It's truly been an amazing experience for me, a  
24 transformative experience. And I just don't understand  
25 how a project in my neighborhood can progress, can



1 proceed without acknowledging the impact that it would  
2 have on this extremely important cultural resource in my  
3 neighborhood.

4           And I don't necessarily think there is ill will  
5 here or bad intention, I just think that it's important  
6 that we all stand up now and say, hey, take a minute and  
7 make sure that all the relevant interests of the  
8 community are acknowledged in the Environmental Impact  
9 Report. So that's the only thing that I would advocate,  
10 to take a minute to do that.

11           And many of these people here from the Banya  
12 are my friends and they have become my friends and we  
13 have built a stronger community, a stronger global  
14 community because of the Banya, and this is super  
15 important for San Francisco. And it's super important  
16 that we don't lose this because we just weren't paying  
17 attention. Thank you very much.

18           VICE PRESIDENT RICHARDS: Thank you.

19           Next speaker, please.

20           MR. FAHEY: Hi. My name is James Fahey, and I  
21 am a resident of Bayview. I use the Banya a lot. I'd  
22 just like to say Figure 3.2.1 does not represent key  
23 viewpoints that should be considered. Please reconsider  
24 that.

25           The current project is an eyesore. It's going

I-  
Grossblatt-1  
cont'd  
(CR-1)

I-  
Fahey-1  
(AE-1)

1 to block very key views. It's a very bad idea. Thank  
2 you.

I-  
Fahey-1  
cont'd  
(AE-1)

3 VICE PRESIDENT RICHARDS: Thank you.

4 Any additional speakers from the public on this  
5 Draft Environmental Impact Report? Please. Please.

6 MR. JENNISON: Yes, sir. My name is Ellsworth  
7 Jennison. That's E-l-l-s-w-o-r-t-h, the last name is  
8 Jennison, J-e-n-n-i-s-o-n. I don't think -- I am not  
9 sure if anyone knows the India Basin area more than me.  
10 I've been living on the edge of the water or on the water  
11 for the last 37 years. I'm here to speak for the --  
12 basically the wildlife in the area.

I-  
Jennison-1  
(ME-7)

13 And I think in the spirit of the AAA  
14 proposition that was passed last year -- or legislation,  
15 I guess, as far as recouping and reconfiguring tidal  
16 lands, it should be considered.

17 The -- the main thing is we have an opportunity  
18 as a city for creating one of the best parks in the  
19 world, not only on the Innes property but also on the  
20 PG&E property. I think that we should really look into  
21 the vision of what could happen.

22 I'm also questioning on the EIR report the  
23 funding of it. Should public land be included by a  
24 private industry in the report when the private industry  
25 pays for the report? To me, it smacks of not only

I-  
Jennison-2  
(GC-4)

1 collaboration but maybe collusion.

2 I think that what we have to realize, that by  
3 being a planning commission, hopefully you have all seen  
4 the area, but if you look to what it would be if we used  
5 eminent domain and made it all a park area, that way you  
6 would have a buffer zone for the tidal area. In the  
7 existing EIR report for the park, they talk about putting  
8 basketball courts and such down near the water. To me,  
9 that is detrimental to the tidal area. All the area in  
10 900 Innes is landfill. What's going to happen with the  
11 compression? Will the City be on the hook in 60 years to  
12 build a sea wall to protect the property that's been --  
13 the taxpayers that will be paying there? I don't think  
14 that's being taken into consideration.

15 But my main point is really if it was -- that  
16 area was to be topographically contoured with trees, it  
17 would add value to the rest of the City and especially  
18 the Bayview area. Then you have the projects up on the  
19 hill that are on Franciscan Rock, maybe make a trade-off  
20 with the developers, maybe get eminent domain from the  
21 federal government that owns that property, just like  
22 they gave us the Naval Yard and the Treasure Island, make  
23 a trade-off for property that was worth 36 million --

24 MR. IONIN: Thank you, sir. Your time is up.

25 MR. JENNISON: -- that was bought in auction

I-  
Jennison-2  
cont'd  
(GC-4)

I-  
Jennison-3  
(HY-1)

I-  
Jennison-4  
(ME-6)

1 for 13 million. But, you know, sometimes you --

2 MR. IONIN: Sir, --

3 MR. JENNISON: Yeah, I know.

4 MR. IONIN: -- your time is up.

5 MR. JENNISON: Yeah, I know my time is up, but

6 --

7 MR. IONIN: You can submit your written

8 comments --

9 MR. JENNISON: Yeah, but I would just --

10 MR. IONIN: -- to the Planning Department.

11 MR. JENNISON: -- like to say that sometimes

12 you can't go to sleep unless you say something. Thank

13 you for the opportunity.

14 VICE PRESIDENT RICHARDS: Thank you, sir.

15 Any additional speakers? I see a couple more.

16 If there are any additional speakers beyond this next

17 speaker, please line up against the TV side of the room

18 so that we can process you guys through a little quicker.

19 Thank you.

20 MS. BLANK: Hi. My name is Roxanne. I am much

21 shorter than everyone else that spoke here, apparently.

22 I work at Archimedes Banya as a manager there as well and

23 I'm a former resident of the neighborhood in the Bayview.

24 I don't have very much to say, but Archimedes

25 was my first experience with communal bathing. The

I-  
Jennison-4  
cont'd  
(ME-6)

I-  
Blank-1  
(CR-1)

1 beautiful thing about communal bathing is that everyone,  
2 no matter what your background is, is allowed to come  
3 together. Kings and peasants, CEOs, entry-level interns,  
4 we all sweat the same. And this is really an important  
5 part of culture that's lacking in American culture  
6 overall, so Archimedes is trying really hard to bring  
7 this to San Francisco and preserve it. And if the EIR  
8 doesn't include Archimedes in its plans, San Francisco is  
9 really at risk at losing this big cultural influence.  
10 Thank you.

I-  
Blank-1  
cont'd  
(CR-1)

11 VICE PRESIDENT RICHARDS: Thank you.

12 Any additional speakers?

13 Seeing none, fellow Commissioners, do you have  
14 any comments that you want to say today or would you like  
15 to submit them in writing?

16 COMMISSIONER KOPPEL: Writing.

17 COMMISSIONER MELGAR: (Nodding.)

18 VICE PRESIDENT RICHARDS: Writing? Writing?

19 Mr. Fong.

20 COMMISSIONER FONG: Yeah. I think -- I just  
21 think we acknowledge all this and hopefully we haven't  
22 overlooked something, so we will be sure to look very  
23 closely at the findings.

A-  
SFPC1-1  
(GC-2)

24 VICE PRESIDENT RICHARDS: Agree. Apparently  
25 there is something here that people are really -- people

A-  
SFPC2-2  
↓ (GC-2)  
27

1 really care about and we need to make sure that if there  
2 is an issue with the EIR that it gets dealt with. And we  
3 will be submitting written comments, in the sake of time.

4 MR. IONIN: Very good, Commissioners. If there  
5 is nothing further we can move onto Item 17.

6 (The portion of the meeting addressing Agenda Item  
7 16 was concluded at 7:07 o'clock p.m.)

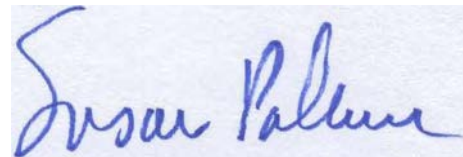
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

**REPORTER'S CERTIFICATE**

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were reported by me, a certified electronic court reporter and a disinterested person, and was under my supervision thereafter transcribed into typewriting.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 23rd day of October, 2017.



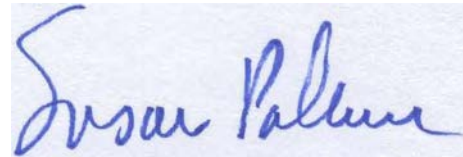
Susan Palmer  
Certified  
Reporter  
CERT 00124

**TRANSCRIBER'S CERTIFICATE**

I do hereby certify that the testimony in the foregoing hearing was taken at the time and place therein stated; that the testimony of said witnesses were transcribed by me, a certified transcriber.

And I further certify that I am not of counsel or attorney for either or any of the parties to said hearing nor in any way interested in the outcome of the cause named in said caption.

IN WITNESS WHEREOF, I have hereunto set my hand this 4th day of February, 2017.



Susan Palmer  
Certified  
Reporter  
CERT 00124



## **Attachment B: Comment Letters on the Draft EIR**





October 27, 2017

Mr. Michael Li  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103

Re: India Basin Mixed-use Project Environmental Impact Report

Dear Mr. Li:

Thank you for the opportunity to comment on the India Basin Mixed-use project (Project). The Project would consist of residential units and commercial uses (including retail, office, R&D, laboratory and clinical care, and institutional), parking, and a shoreline network of publicly accessible open space. The proposed project and variant would include an important segment of the Blue Greenway/San Francisco Bay Trail, and connections to existing segments of Bay Trail to the north and the south.

The Project would also include an approximately 12-foot wide pier that would extend 480 feet into the Bay. Directly adjacent to this pier, a 50-foot by 100-foot floating dock would feature an ADA accessible boat launch area that would provide access to the Bay for human-powered boats. A 1,500-square foot outfitter building, located on land adjacent to the pier, would provide storage for kayaks, canoes, and life jackets; a kayak and canoe rental service; and office space to operate RPD programming. Members of the public would launch their own boats as well as the rental kayaks and canoes, and covered areas for shelter would provide space for birders, outdoor classes, and picnicking. In addition, a gravel beach would be created at the end of the grass Marineway for people to sit or kayakers to launch boats during higher tides. A restricted-access vehicular turnaround would provide disabled parking and loading-zone access adjacent to the Marineway lawn for kayak loading and access by the disabled.

*Background*

The Bay Trail is a planned 500-mile walking and cycling trail around the entire San Francisco Bay, running through all nine Bay Area counties and 47 cities. 354 miles are complete and in use today. Two main goals of the Bay Trail Project are to locate the trail as close as possible to the shoreline, and to provide a fully separated, multi-use bicycle/pedestrian facility. The Bay Trail in

A-  
ABAG-1  
(PD-1)

San Francisco is 30 miles long, with 17 miles complete. The majority of the incomplete segments are located south of the Oakland-San Francisco Bay Bridge. The redevelopment of India Basin represents a phenomenal opportunity to provide these historically park/open space-poor neighborhoods with high-quality waterfront access, and we are excited to welcome these new segments into the regional San Francisco Bay Trail.

A-  
ABAG-1  
cont'd

The San Francisco Bay Area Water Trail is a multi-agency program currently being implemented by the Coastal Conservancy with project partners at the Association of Bay Area Governments (ABAG), the San Francisco Bay Conservation and Development Commission (BCDC) and the State Division of Boating and Waterways, as well as an advisory committee representing a broad range of interests and expertise. The focus of the program is to enhance public access around the Bay for non-motorized small boats (such as kayaks, sailboards, outriggers, and stand up paddleboards), and encourage and enable people to explore the Bay in different boat types and in a variety of settings through single- and multi-day trips.

*Plans and Policies*

The DEIR references the ABAG Bay Trail Plan and its policies, and assesses how the proposed development will address each relevant topic. The Project as described appears to be generally consistent with Bay Trail Plan guidance, however, the Bay Trail Design Guidelines (available at [www.baytrail.org](http://www.baytrail.org)) state that the minimum recommended pathway width is 12' with 3' shoulders on either side, thus bringing the total width to 18'. The DEIR text and figures show only a 12' width. It is unclear if shoulders are incorporated into this dimension. Please illustrate the width of the shoulders in the FEIR, and also provide info regarding proposed trail surfacing.

The DEIR also references the San Francisco Bay Area Water Trail Plan. The Water Trail Plan identifies India Basin as a High Opportunity Site. The boat launch facilities proposed for the Project are designed consistent with those encouraged by the Water Trail Plan, including provision of an accessible launch, storage, outfitter/programs, restrooms, parking, and loading/unloading zone. If feasible, the Water Trail encourages inclusion of boat washdown facilities to help prevent the spread of invasive species as well as allowing boaters to rinse off following a paddle.

A-  
ABAG-2  
(PD-2)

*Transportation and Circulation*

The DEIR should more clearly identify any potential impacts to existing or planned public access via the Bay Trail, including potential impacts during project construction, and offer suitable mitigation for such impacts. The DEIR should clearly identify when segments of the Bay Trail would be constructed during the proposed seven phases of construction. The Bay Trail should be completed in the earliest phases possible and segments should be opened for public use as they are constructed, safety permitting.

A-  
ABAG-3  
(TR-1)

The DEIR should consider the Bay Trail in its regional context as an important commute corridor. It is important that the shoreline trail in this location be a paved Class I multi-use path at least 12' in width with 3' shoulders on either side in order to comfortably accommodate both cyclists and pedestrians, and in order to match the segments it will be connecting with at Hunters Point Shoreline, and southward through to Hunters Point Shipyard and Candlestick Point. With substantial planned population growth in the area, having a continuous Bay Trail alignment from these neighborhoods to employment centers will be of growing importance.

A-  
ABAG-4  
(TR-1)

Connections to and from the Bay Trail into the surrounding neighborhoods are also of key importance. Please evaluate the best options for bicycle and pedestrian circulation to and from the waterfront, and include proposed locations for bicycle racks and wayfinding signage.

A-  
ABAG-5  
(TR-1)

Page 3.5-23 states that the Bay Trail is a "...a continuous 400-mile network of bicycling and hiking trails; 338 miles of the alignment have been completed to date." Please note that the Bay Trail is a planned 500-mile trail and that 354 miles have been completed to date.

A-  
ABAG-6  
(TR-1)

*Biological Resources*

The DEIR states that enhanced kayak facilities could result in less than significant impacts associated with "increased human presence in tidal marsh and open water habitat at India Basin [that] could affect shorebird behavior" (p3.14-44). This is consistent with the Water Trail's EIR, which notes that boater education regarding wildlife and ethical paddling behavior is important to minimize these potential impacts.

A-ABAG-  
7  
(BI-1)

The project inclusion of an outfitter building as well as RPD boating programs offers an important opportunity to provide interpretive education and hands-on learning opportunities to enhance community understanding of the important Bay species and habitat and how to

A-ABAG-  
8  
(PD-2)

minimize disturbance to these resources. The State Coastal Conservancy notes that “encouraging public access that includes learning about ecosystems is the best way to create a community of coastal stewards”<sup>1</sup>. While not required for mitigation, the Water Trail encourages RPD and outfitters to coordinate with the Water Trail Program, Heron’s Head EcoCenter, and other appropriate partners to develop interpretive curriculum and signage that fosters appreciation for wildlife and appropriate paddling etiquette.

A-ABAG-8 cont'd (PD-2)

Thank you for the opportunity to comment on the above-referenced document. The Water Trail is enthusiastic about the proposed non-motorized small boat facilities proposed for India Basin and appreciates the project team’s efforts to solicit and incorporate feedback and design suggestions. If you have any questions regarding the Bay Trail or San Francisco Bay Area Water Trail, please do not hesitate to contact me at (415) 820-7936 or by email at bbotkin@bayareametro.gov.

A-ABAG-9 (ME-1)

Sincerely,



Ben Botkin  
San Francisco Bay/Water Trail Planner

---

<sup>1</sup> Completing the California Coastal Trail. State Coastal Conservancy. January 2003.



# SAN FRANCISCO PLANNING DEPARTMENT

A-  
HPC

October 16, 2017

Ms. Lisa Gibson  
Environmental Review Officer  
San Francisco Planning Department  
1650 Mission Street, 4<sup>th</sup> Floor  
San Francisco, CA 94103

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

Dear Ms. Gibson,

On October 4, 2017, the Historic Preservation Commission (HPC) held a public hearing and took public comment on the Draft Environmental Impact Report (DEIR) for the proposed India Basin Mixed-Use Project (2014-002541ENV). After discussion, the HPC arrived at the comments below:

- The HPC confirms that the DEIR adequately analyzed cultural resources.
- The HPC concurs with the findings that the proposed project does not meet the Secretary of the Interior's Standards and would result in a significant and unavoidable impact on an identified historic resource, the India Basin Scow Schooner Boatyard Vernacular Cultural Landscape.
- The HPC agreed that the DEIR analyzed an appropriate range of preservation alternatives to address historic resource impacts. Further, the HPC appreciated that the preservation alternatives not only avoid some or all of the identified significant impacts but also met or partially met the project objectives.
- The HPC supports the mitigation measures presented in the DEIR. The HPC specifically supports a robust interpretation program for the India Basin Scow Schooner Boatyard Vernacular Cultural Landscape that will interpret the significant features of the landscape and will present the history of boatbuilding at the project site and in the region.

A-HPC-1  
(CR-2)

A-HPC-2  
(CR-2)

A-HPC-3  
(CR-2)

A-HPC-4  
(CR-2)

The HPC appreciates the opportunity to participate in review of this environmental document.

Sincerely,

Andrew Wolfram, President  
Historic Preservation Commission



*Our Mission: To identify and preserve the sites and structures of architectural and historic significance in the Bayview-Hunters Point District, for the benefit of its residents and for the larger San Francisco community.*

*founded in 2004 registered and established public benefit organization: May 1, 2005  
BHS is a non-profit, public benefit organization, verified under Federal Tax I.D. # 20-8093156*

27 October 2017

Mr. Michael Li  
San Francisco Planning Department  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
michael.j.li@sfgov.org

Re: **CASE NO. 2014 002541ENV** INDIA BASIN SHORELINE PARK, 900 INNES AVE., INDIA BASIN OPEN SPACE, AND 700 INNES AVE., SAN FRANCISCO, CALIFORNIA

Dear Mr. Li,

After reviewing the Draft Environmental Impact Report for the proposed India Basin Mixed-Use Project, with particular attention paid to the Cultural Resources Supporting Information under Appendix C, **The Bayview Historical Society recommends a Full Preservation Alternative** with respect to the Shipwright’s Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site, and 838-840 Innes Avenue related structures and pathways.

O-  
BHS-1  
(ME-3)

The Bayview Historical Society commissioned the initial India Basin Historic Survey in 2008, and our members have been active in supporting and advocating for the retention and restoration of cultural resources in the community. We worked with the India Basin Neighborhood Association, in 2006, in their tireless efforts to designate the Shipwright’s Cottage at 900 Innes Avenue as San Francisco Landmark #250. In 2013, we initiated a process with the San Francisco Planning Department/ Historic Preservation Commission to cite the prior owners of 900 Innes Avenue due to violation of the U.S. Department of the Interior ‘Demolition by Neglect’ ordinance. We assembled an archival team to document condition of 900 Innes Avenue, and corresponded with the owners, demanding repairs. Our challenge to SFDBI regarding abatement of repairs resulted in a repair of roofing system at 900 Innes, thus saving the building from further deterioration and loss at the time.

O-  
BHS-2  
(ME-3)



We believe that continuing to preserve this landmarked building is only a part of the story, and that additional preservation of adjacent resources is key to retaining the overall historical significance of the area.

O-  
BHS-2  
cont'd  
(ME-3)

As is noted in the descriptor for the **Full Preservation Alternative**, that action would be 'similar to the proposed project and variant, but would include the rehabilitation to Secretary of Interior (SOI) Standards of all three buildings (the Shipwright's Cottage, the Boatyard Office Building, and the Tool Shed and Water Tank building) that are significant features of the India Basin Scow Schooner Boatyard and contribute to the boatyard's CRHR eligibility. The Full Preservation Alternative would also propose that plantings and new park furniture would be designed to retain the industrial character of the cultural landscape.' We suggest that these comprehensive preservation steps are entirely consistent with the opinions rendered by the senior consultants to the Draft EIR.

O-  
BHS-3  
(ME-3)

For example, the Page and Turnbull Report provides this overview to the Cultural Resources section:

#### SUMMARY OF FINDINGS

This report evaluates five properties, or sub-areas, within the project area determined to be over 50 years in age, therefore considered potentially eligible for listing in the California Register. These sub- areas are: the Shipwright's Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site; 838-840 Innes Avenue; and 702 Earl Street. No other properties or features within the project area are of an age to qualify for listing in the California Register. Page & Turnbull's findings indicate that three California Register-eligible properties exist: the Shipwright's Cottage (previously designated as San Francisco Landmark #250 under Article 10 of the Planning Code); the India Basin Scow Schooner Boatyard site, including three buildings and several objects and landscape features; and the former boatyard building at 702 Earl Street. These properties would therefore be considered historic resources for the purpose of review under the California Environmental Quality Act (CEQA).

O-  
BHS-4  
(CR-2)

**Appendix C\_Cultural Resources Supporting Information\_ Part2:Page and Turnbull Report:  
p3**

Further noted in Appendix C. 3.1.1. , under Federal Regulations, “ Historic Sites Act (1935). The Historic Sites Act, Title 16, Section 461 and following of the United States Code (16 USC 461 et seq.), declares a national policy to preserve historic sites, buildings, antiquities, and objects of national significance, including those located on refuges. The Historic Sites Act provides procedures for designation, acquisition, administration, and protection of such sites.” and “ California Code of Regulations, Title 14, Section 4307. This state preservation law prohibits removal, injury, defacement, or destruction of objects of paleontological, archeological, or historical interest or value.”

O-  
BHS-4  
cont'd  
(CR-2)

We believe that the historical interest in the area is supported by the obvious ‘value’ of the people and activities which are clearly documented and understood. This local, Bayview-based history is largely unknown to many in San Francisco, yet the India Basin activities in the late 19th Century are reflective of the actions and passions of our City’s pioneers.

“Upon relocating to the northern shore of the remote Hunters Point peninsula, the immigrant shipwrights were finally able to begin building scows and other vessels in one location for over half a century without disturbance. Noting the concentration of family-run boatyards in the area, an article in the November 1869 edition of the San Francisco Real Estate Circular stated that “South San Francisco will undoubtedly be one of the most valuable locations for shipbuilding and manufacturing purposes in the county.”<sup>52</sup> The boatyards that operated at India Basin were small-scale and tended to operate with informal verbal contracts. Their boatyards were frequently home-based industries, with their houses located on or near the boatyard properties. Despite their small scale, the manufacturing and repair of hand-made sailing vessels was vital to San Francisco’s distinctive maritime-based economy. According to the 1880 Census schedules, several of the first settlers in India Basin were English, including Albion Brewery’s John Burnell and Reverend George E. Davis, a pioneer from London who moved to the corner of 8th Avenue South (Hudson) and ‘H’ (Hawes) Street in 1873. Other European immigrants who moved to India Basin in the 1860s and 1870s included Netherlands-born Johnson J. Dircks (1869), William Munder (1869), Hermann Metzendorf (1872), Edmund Manfred (1875), and Fred Siemer (1886), all from Germany. Ireland contributed John McKinnon (1868) and James Pyne. Denmark was a primary source of boat builders, including O.F.L. Farenkamp (1877), Henry Anderson (1893), and Otto Hansen.

The first known shipwright to move to India Basin was Johnson J. Dircks. He established a yard at the corner of 5th Avenue South (Evans) and 'L' (Lane) Street in 1868. Not long after, in 1871, William Stone moved his yard from Potrero Point to 9th Avenue South (Innes), near 'G' (Griffith) Street. In 1876, Dircks moved all of his operations to a site next to Stone's on 9th Avenue South.<sup>54</sup> By 1880, Dircks' and Stone's sons began to apprentice with their fathers. The passing on of knowledge and craft was a common cultural practice among the boat-building families of India Basin; indeed most of the men who had migrated to the area had learned the craft from their fathers in Europe. The shipwrights in India Basin – Dircks, Stone, Siemer, and Anderson – passed on their craft to their native-born American sons, thereby developing a longstanding tradition of boatbuilding in the neighborhood that would last three generations.<sup>55</sup> 1883 Coast Survey Map The 1883 U.S. Coast Survey map is the first map to illustrate the extensive changes that had occurred.”

**India Basin Historic Survey/KVP pp.27 Bayview Historical Society publication 2008**

A letter from Johnson J. Dircks great, great grandson, Brian Dircks, is attached to this correspondence and captures his spirit when celebrating the 900 Innes Avenue Shipwrights's Cottage in 2014. As part of the Cultural Resources appendix in the Draft EIR, the cottage is further linked to the larger historical context which clearly includes the India Basin Scow Schooner Boatyard and other resources.

#### 5.1.1. Shipwright's Cottage

As indicated in the HRE (Page & Turnbull, 2016:6), the Shipwright's Cottage at 900 Innes Avenue was found individually eligible for listing in the CRHR by KVP under Criteria 1 and 3 “due to its association with resident shipwrights employed in the boat yards of India Basin and as a rare example of a very early Italianate cottage. It is only one of two remaining nineteenth- century dwellings (the other being 911 Innes) in India Basin.” The period of significance for the Shipwright's Cottage was identified as 1870–1938, the fullest possible period considered by the survey.

In 2008, in light of the KVP effort (2008) the Shipwright's Cottage was designated San Francisco Article 10 Landmark #250. The building's designation nomination encompasses only the residence and no surrounding features. The Landmark Designation Report completed for the Shipwright's Cottage found the building to be significant under Criteria A (Events) and C (Architecture), and specified the period of significance as 1870–1930 (which encompasses several years before the building's construction around 1875) (Page & Turnbull, 2016:7).

**Appendix C\_Cultural Resources Supporting Information\_ Part2:Page and Turnbull Report** ↓

### 5.1.3. India Basin Scow Schooner Boatyard

The KVP survey (2008) also identified a potential CRHR-eligible historic district, the India Basin Boatyards Historic District, comprising numerous buildings and other landscape features across eight parcels once associated with the Anderson & Cristofani and adjoining Allemand Brothers Boatyards. A DPR 523D (District Record) form was completed for this district, listing the period of significance as 1893 to 1935. According to Page & Turnbull (2016:6), KVP identified numerous resources within the boundaries of the district but did not specify contributors and noncontributors. Page & Turnbull further noted (2016:6) that several of these listed resources were constructed outside of the identified period of significance. Page & Turnbull refined KVP's assessment, determining that the boatyard site is most appropriately defined as a vernacular cultural landscape, a type of property that has "evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family, or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives" (Birnbaum, 1994). The India Basin Scow Schooner Boatyard, as it was subsequently designated by Page & Turnbull (2016:19), aligns in some respects with the India Basin Boatyards Historic District that KVP previously identified, although Page & Turnbull has determined that the property is more appropriately described as a site than as a historic district given its numerous landscape features (natural and manmade) that convey its significance (2016:99). The beginning of the India Basin Scow Schooner Boatyard's period of significance is 1875, the year that Johnson Dircks first established a boatyard at the site, which was later acquired by Henry Anderson and expanded as the Anderson & Cristofani Boatyard. Page & Turnbull (2016:99) finds that 1936 is the most appropriate end date of the period of significance as this year marks the opening of the of the San Francisco–Oakland Bay Bridge. From this point forward, the transportation of goods via vehicle (as opposed to vessel) became predominant in the Bay Area and marks the ultimate end of the era in which wood watercraft (the boatyard's specialty) was integral to the Bay Area's transport economy (Page & Turnbull, 2016:99).

**The India Basin Scow Schooner Boatyard is characterized by a range of built and natural features that date to this decades- long use as a boatbuilding and repair yard—including six buildings, four structures, and several small-**

O-  
BHS-4  
cont'd  
(CR-2)

**scale features, in addition to topography, views, circulation routes, and bodies of water**(Plate 1). These features continue to convey the spatial and functional relationships that defined the operations of the yard and can be internal to or external to the property boundaries.

O-  
BHS-4  
cont'd  
(CR-2)

**Page & Turnbull (2016:99) determined that the India Basin Scow Schooner Boatyard site is: historically significant site under Criterion 1, for its associations with San Francisco’s wood scow schooner building and repair industry that was centered at India Basin.** Scow schooners were integral to the transportation of goods throughout the San Francisco Bay area during the late nineteenth and early twentieth centuries, prior to the era of widespread automobile use and bridge construction. The remote settlement of immigrant shipwrights at India Basin was responsible for building and repairing such vessels and represented an important working community that, while off the beaten path, supported the region’s economy through skilled workmanship. Due to gradual development around India Basin and dramatic infilling of the shoreline, much of the landscape conveying the previous era of shipbuilding no longer exists. As the site of the longest consecutively operating boatyards at India Basin, the India Basin Scow Schooner Boatyard is the best remaining physical representation of the area’s significant working class community.

The India Basin Scow Schooner Boatyard as defined by Page & Turnbull is particularly relevant to the current investigation because any historic maritime archeological resources occurring in the APE, specifically those that relate to the local boatbuilding industry during the period of 1875–1936, would potentially be contributing features to this vernacular cultural landscape site. Table 2 lists the elements of the India Basin Scow Schooner Boatyard and their construction dates, and identifies whether they are considered contributing features.

**Appendix C\_Cultural Resources Supporting Information\_ Part1: Aecom Report: Section 5.1.3. Archeological Survey Report India Basin Mixed-Use Project**

The 'contributing' status of various buildings, pathways and other resources as outlined in Table 2, attached to the above Appendix C, Part1, AecomReport Sect. 5.1.3 provides a guideline for designing and implementing the Full Preservation Alternative. The significance of the the area is further articulated in these comments regarding eligibility for inclusion in the California Historic Register.

O-  
BHS-4  
cont'd  
(CR-2)

INDIA BASIN SCOW SCHOONER BOATYARD California Register Eligibility  
Criterion 1

Page & Turnbull finds that the India Basin Scow Schooner Boatyard site, a boat building and repair yard in operation beginning in the 1870s, is a historically significant site under Criterion 1, for its associations with San Francisco's wood scow schooner building and repair industry that was centered at India Basin.

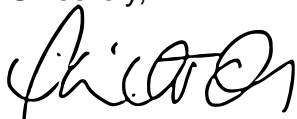
Some aspects of the site's integrity, namely materials and workmanship, are somewhat compromised. Most features within the property have been neglected and are in various states of decay and collapse, or are heavily overgrown to the point that original materials, design features, and workmanship cannot be fully conveyed. In spite of these issues, Page & Turnbull considers that enough features remain at the site to convey the significant overall functional relationships that have characterized the boatyard for many decades. The India Basin Scow Schooner Boatyard is therefore considered to have adequate overall integrity to convey its historical significance.

**Appendix C\_Cultural Resources Supporting Information\_ Part2:Page and Turnbull Report  
INDIA BASIN PROJECT HISTORIC RESOURCE EVALUATION PARTS 1 AND 2 March, 2017**

Thank you for considering our comments. We respectfully suggest that a Full Preservation Alternative for the Shipwright's Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site, and 838-840 Innes Avenue related structures and pathways be thoroughly considered during your review of the Draft EIR for the India Basin Mixed Use Project.

O-  
BHS-5  
(ME-3)

Sincerely,



Dan Dodt  
President, Bayview Historical Society

cc: BHS Board and membership; IBNA; BayviewCAC

**Speech by Brian Dirks**  
**Community Celebration of City of San Francisco Purchase of 900 Innes**  
**India Basin**  
**Sept. 18, 2014**

What an honor to be here. It is truly wonderful that so much has been done to transfer this small plot of land into public ownership so that it can remain a permanent fixture of the Bay Area's rich maritime heritage.

For me to be standing by the house that was first inhabited by my great-grandfather's grandfather, the first on the Dutch side of my family to settle in America, seems like a great homecoming - even if it has been more than 10 dozen years since a Dirks lived here. Reading about the other well-known shipwrights who also lived in this house and in neighboring houses no longer standing makes this an especially historic location. What happened here all of those years ago certainly had a multi-generational influence on my family that continues to this day.

Seeing the house makes me wonder if any or all of his six children lived here too. The place doesn't look big enough for that.

Here's what my great-uncle, the late George Dirks of Walnut Creek, wrote about his great-grandfather:

“Jan Janse Dirks, born 1825, arrived in San Francisco from Holland on a German sailing ship in 1851. He was the ship’s carpenter, but after sailing around Cape Horn, he felt he had enough of life on the seas and he jumped ship to make a new life in San Francisco. He was six feet, six inches tall and strong as an ox. His friends called him “Long John” or “Honest John the Hollander.”

Long John started a ship repair shop on Potrero at the foot of Sixteenth Street. He began building scows in the Islais Creek area that became known as Butchertown, due to the rendering plants and slaughterhouses there.

I like that John Dirks was the first shipwright to settle here at India Basin in 1868, possibly because he couldn’t take the stench from Butchertown, but also that he likely saw a lot of opportunity to grow his business on these shores. That made him a true entrepreneur, as well as a pioneer.

Jan J. married a German-born woman, Gesa Dammann 1854. Their kids were John A. Minny, Delia, Henry, Ellen and George Jesse Dirks.

Through the generations we have lost track of any descendents of the older five. Their youngest, George Jesse, was my great-great grandfather.

George Jesse continued in the maritime trade. We know he worked at the Matthew Turner shipyard in Benicia, where he was the boss caulker and his son, George Oliver Dirks, served his caulking apprenticeship. One of the ships they built was The Equator, a two-masted pygmy trading schooner that carried passengers Robert Louis Stevenson and his wife, Fanny, on a voyage through the islands of



Micronesia and was the inspiration of the story, "The Wrecker," in his book: "Tales of the South Seas."

The story goes that the newly built 80-foot Equator and the British battleship Calliope were the only ships to ride out the great Samoan hurricane of March, 1889, where winds raged up to 200 miles per hour and cast waves 80-feet high. The storm destroyed three American and three German ships of war and cost hundreds of lives. No one dreamed the relatively small vessel Equator could survive it. But she did, certainly due in no small part to the expert building and watertight caulking by George Jesse Dirks and his crew to make her so buoyant. By the way, the Equator spent her final days as a tug in Puget Sound and still stands in dry dock in the Port of Everett, in desperate need for a little Tender Loving Care.

My own grandfather, Clarence Oliver Dirks, also was also a caulker, learning the trade from his father George Oliver (son of George Jesse). He quit school for a time in the eighth grade so that he could work in the shipyards during World War I, which he did again during World War II. He attended high school in Palo Alto where he became an All-American football player – probably helped by the muscles he'd built up swinging the big sledgehammer-like caulking tool known as a beetle.

Clarence was recruited by the University of Washington in 1926 and was named captain of the Huskies in 1928. Later as a sportswriter for the Seattle P-I he

covered the UW's crew team in the years leading up to their Gold Medal victory against Nazi Germany in the 1936 Olympics. He became a well-read newspaper columnist for the P-I as well as a farmer and lay preacher, but continued to supplement his income as a ship caulker until he was well into his 70s. I remember that he always had one wood-planked boat or another behind his barn to work on too, in fact he gave us one for Christmas one year. Most of our family's caulking tools were donated to the Maritime Museum here in San Francisco but we still have some mallets and other stray tools on a garage shelf.

My own father, Martin Dirks, became a prominent civil engineer in Seattle and never worked in the maritime business, nor did any of his five sons – including my younger (and much taller) brother, John Dirks. But we all have a great love of boating and the water that we inherited from our forefathers. My uncle Mike Dirks raised two sons in Spokane, one of whom is on temporary leave as a developer from his job at YouTube here in the Bay area.

My dad, now 80, has as one of his proudest possessions an ornate gold pocket watch made by a jeweler in Sacramento that belonged to Jan Janse Dirks.

John J. Dirks lived to age of 92 and is buried over in San Mateo County with Gesa and two of their children. An interesting footnote to his story is that a few years following the death of his beloved Gesa in 1891 the old man apparently remarried a much younger woman named Sarah. He made her sign a pre-nup but she welched on it that very afternoon. After she died – we don't know how – he sued the trust

company handling her estate for the squandered sum, a case that made it all the way to the California Supreme Court. They found for Dirks.

So Jan Janse won, just as the residents of India Basin and the whole Bay area won by their dedication to this property and the important history that it holds. Once again our family is very grateful for all you have done, and for the opportunity to be a small part of this lasting legacy and common birthright. Thank you.

Hello Bayview Historical Society,

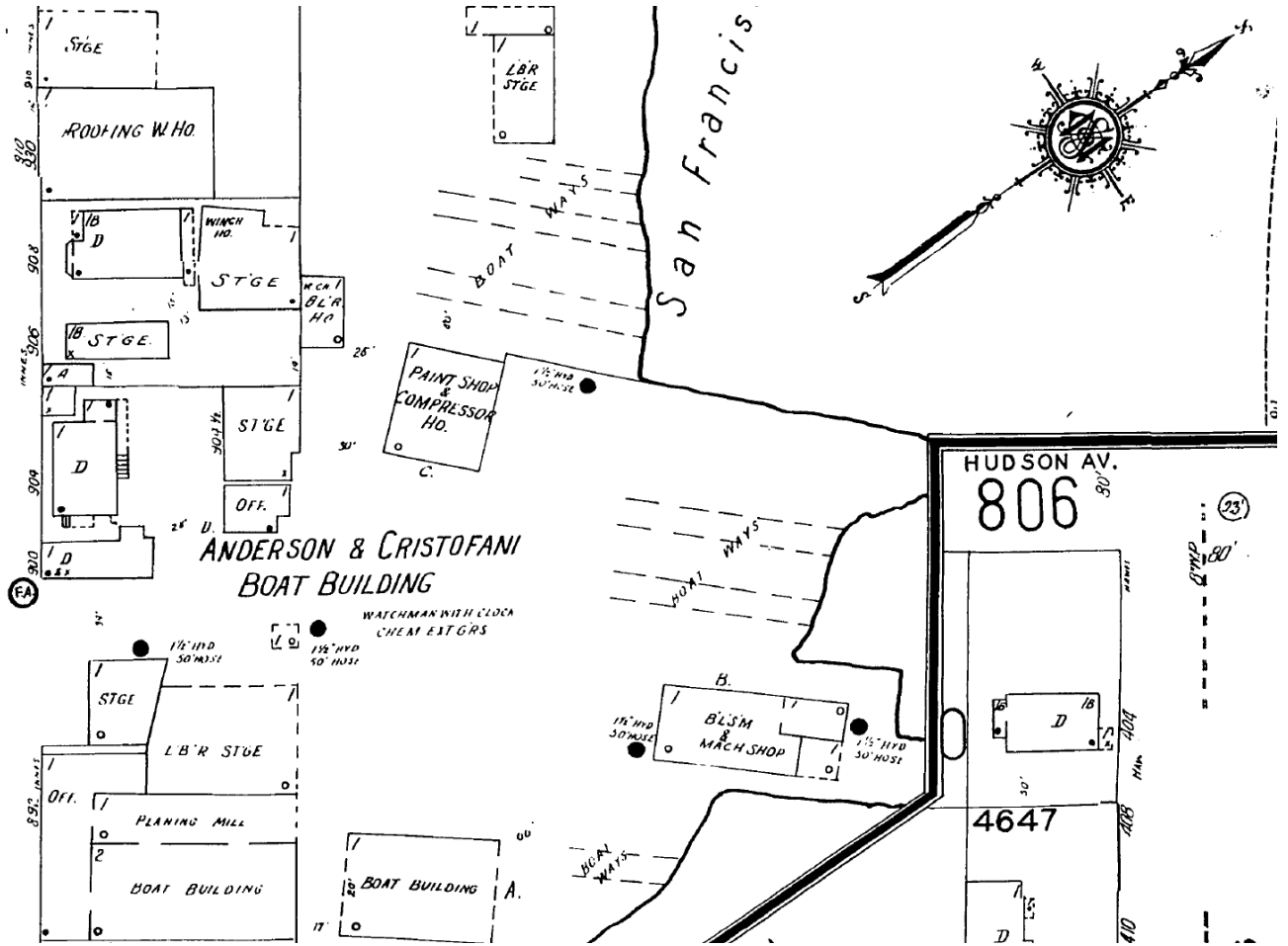
Thank you again for your gracious offer to subsidize Brian Dirk's trip to participate in the 900 Innes ribboncutting!

His airfare receipt is attached - as you can see, the flight alone was close to \$600; with lodging and transit, the total journey ran about \$900, so your \$400 contribution really did make the difference in enabling him to be there to represent his family and the history of the site.

If you would, please mail a check made to "Brian Dirks" to 35432 26th Place S., Federal Way, WA 98003.

I'm also happy to share a writeup of Brian's comments at the celebration (also attached), for the BHS records.

INNES AV.



DH  
 STWP  
 3A



*Our Mission: To identify and preserve the sites and structures of architectural and historic significance in the Bayview-Hunters Point District, for the benefit of its residents and for the larger San Francisco community.  
founded in 2004 registered and established public benefit organization: May 1, 2005*

**Representative Projects:**

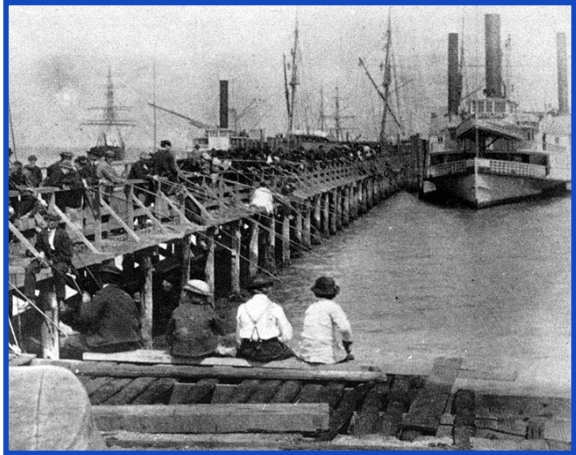


**2005** House histories in Bayview. Conducted photographic and preliminary survey of historic structures in area. Coordinated work w/SF Public Library.

Sylvester House, ca. 1865 receives Robert Friese Award for Historic Preservation from San Francisco Beautiful.

**2006** Landmark Support – 900 Innes Support of India Basin neighbors for presentations and testimony to advocate for landmark status of Shipwrights Cabin on Innes Avenue.

**2007** Hunters Point Power Plant. Support of India Basin neighbors in opposition to improper and non-permitted demolition of PGE plant. Leads to Boss/Lantsberg effort to create India Basin Survey.



**2008** India Basin Historic Survey Authored by: Chris Ver Planck - historian. Published documentation by BHS. Public Presentation of Survey to BVHP-PAC; Public Presentation of Survey to SFBOS.

**2009** Drafted Peskin amendment to Bayview Redevelopment Plan adoption; adopted by SFBOS and incorporated into BVHP Redevelopment Plan.

Proposal to SFRA for historic survey of all Bayview neighborhoods - awarded to AAHS.





**2010** Continued collaboration w/San Francisco Public Library Bayview Branch - historical archive.



**2012** Joined with BVOCP in challenge to demolition of Berkeley Farms center. Settlement and legislative modifications to San Francisco Planning re: Berkeley Farms distribution center and PDR notification.



**2013** Challenge to SF Planning Department/ Historic Preservation Commission to cite owners of 900 Innes due to violation of 'Demolition by Neglect' ordinance. Assemble archival team to document condition of 900 Innes Avenue. Correspondence to owners of 900 Innes and SF Planning demanding repairs. Joined with IBNA to challenge at DBI regarding abatement of repairs. Realized repair of roofing system at 900 Innes. Continued advocacy for future preservation of this S.F. Landmark #250.

**2014** Chinese Whispers:BC Shrimp Junk Sail to Bayview - Lead Community Sponsor. Co-sponsor of BRITELights on 3rd installation. Proposed Sculpture relocation to Bayview Town Center -The REDFISH project. House and Site Histories -Bayview outreach to property owners. Membership Drive 2014.

Photographs of Bayview, Butchertown, Islais Creek, India Basin property of: Bancroft Library Collection; San Francisco Public Library; Bayview Library Archive; private collections. The Bayview Historical Society is an educational, cultural and historical public benefit organization, not-for-profit, with fiscal sponsorship provided by the 501(c)3 registered Bayview Multi-purpose Senior Services.



**2015** The REDFISH project: relocation and securing of original sculpture by William Wareham- HPS artist to SF Port location; House and Site Histories -Bayview outreach to property owners; Pro-Bono partnership with Bayview Community Planning and sponsorship of artBAYVIEW- a GPS and geo-mapping of public art sites in the Bayview District. Coordination and planning efforts with STAR

(Shipyard Trust for the Arts) for support of

historic survey and historic district designation for Hunters Point Shipyard - pending; Correspondence and support of Midway Project, Mendell Plaza historic resources, etc.

**2016** Planning for 'Bayview History Night' event tbd in Bayview District. Outreach to African-American Historical Society and California Historical Society. Pro-Bono partnership with Bayview Community Planning and EDoT for creation of the T-Line Newsletter. Continued updating of artBAYVIEW- geo-mapping of public art sites in the Bayview District.



**2017 in progress:** Proposed support and co-sponsorship of the Bayview Education Endowment; Support of India Basin Projects and historic survey updates; Redfish Project; Bayview History Night planning.

**Li, Michael (CPC)**

---

**From:** J. M. Pierce <jmichellepierce@gmail.com>  
**Sent:** Monday, October 30, 2017 4:54 PM  
**To:** Li, Michael (CPC); Gibson, Lisa (CPC)  
**Subject:** Bayview Hunters Point Community Advocates comments on India Basin Draft Environmental Impacts Report  
**Attachments:** Greenaction comments on DEIR October 30, 2017.pdf

San Francisco Planning Department,

Please consider this email the Bayview Hunters Point Community Advocates full-throated endorsement of Green Action's comments attached below. It is egregious that a project of this scope of environmental destruction and permanent community displacement should be allowed to go forward in a "progressive" city. We can all do better than this.

O-  
BHPCA-1  
(GC-6)

J. Michelle Pierce

Executive Director  
Bayview Hunters Point Community Advocates, Inc.

Strategy, Sustainability, Community

--

J. Michelle Pierce  
[415.269.3663](tel:415.269.3663)  
[jmichellepierce@gmail.com](mailto:jmichellepierce@gmail.com)

Strategy, Sustainability, Community





October 30, 2017

Michael Li  
San Francisco Planning Department  
1650 Mission Street Suite 400  
San Francisco, CA 94103  
*Submitted via email to michael.j.li@sfgov.org*

**Greenaction for Health and Environmental Justice Comments on DEIR for Proposed India Basin Mixed Use Project**

On behalf of our members and constituents in Bayview Hunters Point, San Francisco, we submit the following comments on the Draft Environmental Impact Report for the proposed India Basin Mixed Use Project. Greenaction For Health and Environmental Justice is a multiracial grassroots organization that works with low-income and working class urban, rural, and indigenous communities to fight environmental racism and build a clean, healthy and just future for all. Greenaction has been involved in environmental health and justice advocacy in Bayview Hunters Point since we were founded in 1997. This low-income community of color continues to be negatively and disproportionately impacted by pollution, gentrification, health disparities, and other forms of environmental, social, economic injustice.

**I. San Francisco Planning Department's Denial of Language Access and Violation of Civil Rights of Limited and Non-English Speaking Residents:**

The San Francisco Planning Department's refusal to translate the Scoping Notice for this proposed project and failure to provide even executive summaries of key project documents has denied residents who are limited or non-English speaking from meaningful civic engagement in this environmental review process. As the City and County of San Francisco are recipients of state and federal funding, it must comply with state and federal civil rights laws (California Government Code 11135 and Title VI of the United States Civil Rights Act). These civil rights laws explicitly prohibit recipients of state and/or federal funding from taking actions that have a disparate, discriminatory impact on people of color and non-English speaking people.

The first civil rights violation occurred when the Planning Department failed to translate the Scoping Notice and refused to remedy that failure. Thus, the ongoing failure to provide language

access, and the subsequent refusal to remedy the problem, constitutes a violation of state and federal civil rights laws. No permit can be issued based on a process that clearly violated the civil rights of residents potentially impacted by the proposed project.

In addition, the Planning Department's translation of the "Notice of Public Hearing and Availability of A Draft Environmental Impact Report" in no ways complies with language access requirements as the limited and non-English speaking residents who may see that Notice in a language they understand would still not be able to read a single word of the DEIR document.

We attach documentation of the civil rights and language access violations, and incorporate those documents into our comments.

**II. Greenaction does not oppose the Recreation and Parks Department component of the project, except all toxic contamination must be remediated and the project must not contribute to gentrification:**

The people of Bayview Hunters Point deserve more open space and parks, but the open space and parks must be safe and free of toxic contamination.

The San Francisco Recreation and Parks Department has been responsive to input and concerns about toxic contamination at the site, and it appears they are addressing the contamination issue.

However, we remain concerned with the plans in the RPD component of the project that would result in increased subsistence fishing and consumption by low-income people and their families and friends of toxic-contaminated fish from the Bay. This concern can be partially remedied by the placing of multilingual fish advisory signs along the waterfront, and a Healthy Subsistence Fishing community education project such as the pilot project currently being conducted by Greenaction in partnership with RPD.

In addition, plans to promote kayaking at the site will directly contribute to the gentrification threatening to displace long time people of color residents from their community.

**III. Greenaction agrees with the conclusion reached by the Planning Department's Draft EIR which "finds that implementation of the proposed project would lead to significant unavoidable project-level or cumulative impacts related to cultural resources, transportation and circulation, noise, air quality, and wind."**

However, the DEIR underestimated a number of other key significant aspects of the proposed project that would also have significant unavoidable and negative impacts on the environment, community and public health.

Therefore, due to the significant unavoidable negative impacts, the Planning Department must deny permits for the proposed project.

#### **IV. Planning Department Must Not Use a Statement of Overriding Consideration to Approve this Project Despite Significant Unavoidable Negative Impacts:**

It would be completely improper, and a violation of civil rights of people of color residents of Bayview Hunters Point, if the Planning Department decides to circumvent EIR findings of significant unavoidable impacts by using a Statement of Overriding Consideration exemption under CEQA.

Use of a Statement of Overriding Consideration to approve an upscale mega-development project that would contribute to pollution and gentrification of the already polluted, heavily impacted people of color community would be a major violation of civil rights and would be challenged successfully.

#### **V. Population and Housing: Section 3.3**

The DEIR's conclusion in Section 3.3 that "The proposed project or variant would not induce substantial population growth in an area..." and thus have a "Less than significant" impact is contradicted by the facts of the project proposal. The project proposes to build either 1240 dwelling units or 500 – which clearly would involve thousands of new residents in the area.

The conclusion that "The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not substantially contribute to cumulative impacts related to population and housing" is also factually incorrect. The BUILD LLC project at India Basin, combined with the even larger Lennar/Five Points SF Shipyard project, would result in many thousands of new dwelling units and tens of thousands of new residents. In addition, as these projects are targeting a higher income level than that of most Bayview Hunters Point residents, these projects will have a major, significant and unavoidable negative impact including gentrification and the ultimate displacement of long time people of color and low income residents of the community.

These impacts are significant, negative, and unavoidable if the project is approved.

#### **VI. Cultural Resources: Section 3.4**

Greenaction agrees with the DEIR's conclusion that "Construction under the proposed project or variant would disturb human remains, including those interred outside of formal cemeteries."

This area of Bayview Hunters Point is known to have been occupied the Ohlone people. Any project that would disturb, remove or desecrate human remains of the original inhabitants of this

land is unacceptable. These remains should be respected and not be removed from their resting place. This would be a significant negative impact that is unavoidable and cannot be mitigated.

## **VII. Transportation and Circulation: Section 3.5**

The DEIR's conclusion in Section 3.5 that "The proposed project or variant would not cause substantial additional VMT or substantially induce automobile travel" and that the impact would be "Less than significant" is clearly incorrect. The impact will be significant and unavoidable as the India Basin project would bring thousands of people to the residential and commercial developments on a daily basis – and a large number of these individuals will travel by automobile. No amount of traffic control, shuttles, or even public transportation improvements will be able to reduce this impact to less than significant.

## **VIII. Noise: Section 3.6**

We agree that many of the noise impacts would be significant and unavoidable.

## **IX. Air Quality: Section 3.7**

We agree with the DEIR's assessment that this project will have significant and cumulative negative health impacts on air quality that cannot be mitigated and are unavoidable. Moreover, these impacts will exacerbate health impacts in an already heavy polluted and highly vulnerable low income community of color. In light of these facts, the proposed project cannot and must not be approved.

The CEQA analysis should include environmental, health, air quality and cumulative impact information from the California Environmental Protection Agency and the Bay Area Air Quality Management District (BAAQMD) – both of whom have documented that Bayview Hunters Point is a community highly at risk from pollution.

In 2004 BAAQMD initiated the Community Air Risk Evaluation (CARE) program to identify areas with high concentrations of air pollution and populations most vulnerable to air pollution's health impacts. The Bayview Hunters Point community was designated by BAAQMD as a CARE community. In Bayview Hunters Point, the intersection of ports, railways, municipal vehicle yards, concrete batch plants, freeways, and a large waste water treatment facility has contributed to high rates of air pollution and asthma hospitalizations. According to the Bay Area Air Quality Management District (BAAQMD), despite tremendous strides in air pollution reduction, communities such as Bayview Hunters Point, experience higher pollution levels, and more adverse health effects, compared to their counterparts in other parts of the region ([http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE\\_Retrospective\\_April2014.ashx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx)). Additionally, according to a report by the Bay Area Regional Health Inequities Initiative (a collaboration of senior officials, managers and staff from eight health departments in the Bay Area), where a person lives helps determine his or her

health outcomes: Bayview/Hunters Point residents are expected to live 14 years less than those living in Russian Hill ([http://barhii.org/wp-content/uploads/2015/09/barhii\\_hiba.pdf](http://barhii.org/wp-content/uploads/2015/09/barhii_hiba.pdf)).

CalEnviroScreen 3.0 is a screening tool that ranks California communities based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors and prevalence of certain health conditions. CalEnviroScreen 3.0 ranks Bayview Hunters Point in the 90<sup>th</sup> percentile. This percentile means that Bayview Hunters Point has a higher pollution burden and pollution vulnerability than 90% of California (CalEnviroScreen 3.0 Data Map, <https://arcgis.com/qim5X>).

More specifically, CalEnviroScreen ranks Bayview Hunters Point in the 99<sup>th</sup> percentile for diesel particulate, 98<sup>th</sup> percentile for groundwater threats, 98<sup>th</sup> percentile for asthma, 99<sup>th</sup> percentile for low birth weight, and 86<sup>th</sup> percentile for hazardous waste. The community's vulnerability to pollution is amplified by socioeconomic factors such as poverty, unemployment, and housing affordability. CalEnviroScreen ranks Bayview Hunters Point in the 87<sup>th</sup> percentile for poverty, 84<sup>th</sup> percentile in unemployment, and 91<sup>st</sup> percentile in housing affordability (residents of low-income households with high housing costs may suffer adverse health impacts).

#### **X. Greenhouse Gas Emissions: Section 3.8**

The DEIR incorrectly concludes in Section 3.8 that “The proposed project or variant would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.”

Greenhouse gas emissions from construction and the vehicular and truck traffic associated with constructed and using the proposed project residential and commercial components would add to the unacceptable level of air pollution impacting Bayview Hunters Point and its residents. Any increase of emissions into the air of this community which both the Bay Area Air Quality Management District's CARE program and the California EPA's CalEnviroScreen will further threaten the health of residents already at risk and highly vulnerable.

#### **XI. Utilities and Service Systems: Section 3.12**

The DEIR failed to consider that the addition of thousands of new residents and workers whose homes and workplaces would add to the Southeast wastewater treatment facility's load. The sewage treatment plant in Bayview Hunters Point already handles most of the City's sewage as well as other that from other locations, and adding to this burden would have a significant unavoidable impact.

#### **XII. Public Services: Section 3.13**

The DEIR's conclusion that the proposed project or variants would not increase demand for fire, police, library, school services is incorrect. Clearly, the addition of thousands of new residents and office/commercial workers in hundreds of new dwelling and commercial units would have a significant impact on limited city services.

**XIII. Hazards and Hazardous Materials: Section 3.16 – and Toxic and Potentially Radioactive Contamination at the Site:**

Due to the close proximity of the proposed project to the radioactive contaminated Hunters Point Naval Shipyard Superfund site, and in light of information provided by community elders and whistleblowers regarding testing, handling and disposal of radioactive wastes at the Shipyard, this project must include a thorough testing, analysis and summary of potentially radioactive and toxic contaminants before any use of this site. While Recreation and Parks has done testing for toxic contaminants and is planning extensive remediation, we are not aware of test results from the BUILD LLC project component. This information is also vitally important to include in the CEQA/EIR process in light of the certainty of rising sea levels and potential storm surges.

**XIV. Impact of Sea Level Rise:**

The DEIR fails to discuss or evaluate the impact sea level rise will have on the proposed project, including homes, businesses, infrastructure, and the hazardous waste contamination that may be left at the site.

The DEIR states “The project site is subject to flooding from sea-level rise, but the proposed project or variant would not exacerbate the frequency or severity of flooding or cause flooding in areas otherwise would not be subject to flooding without the project.” This proposed project may or may not “exacerbate the frequency or severity flooding,” but will be impacted by rising sea levels and storm surges associated with climate change.

The San Francisco Bay Conservation and Development Commission and the San Francisco Department of the Environment are predicting a sea level rise of 11 to 19 inches by 2050 and 30 to 55 inches by 2100. An increase of sea level will cause coastal flooding, storm surges, coastal erosion/shoreline retreat, rising groundwater and wetland loss. Communities living near San Francisco Bay, such as Bayview Hunters Point, are extremely vulnerable to flooding from sea level rise – and this includes the proposed India Basin project site.

Submitted,

Sincerely,

Bradley Angel, Executive Director  
Sheridan Noelani Enomoto, Community Organizer and Policy Advocate

**Li, Michael (CPC)**

---

**From:** Robin Chiang <marlinspike1000@gmail.com>  
**Sent:** Monday, October 30, 2017 6:20 PM  
**To:** Li, Michael (CPC)  
**Cc:** Dan Dodt; Chicuata, Brittini (BOS); Chan, Yoyo (BOS); Cohen, Malia (BOS); Janet Carpinelli  
**Subject:** Re: BHS LETTERtoPLANNING re- IndiaBasin EIR.pdf  
**Attachments:** BHS LETTERtoPLANNING re- IndiaBasin EIR.pdf

Dear Mr. Li:

On behalf of the 94124 community, Dan Dodt wrote an eloquent and accurate argument for a more thoughtful approach to development in our city's most significant historic sites--artifacts from our maritime legacy. The two boatyard properties and the shipwrights cottage are intrinsic to the story of the city's history. These and a handful of other properties in 94124 require our understanding, foresight and intervention to prevent their replacement by a network of interpretative signs. Why settle for verisimilitude when we can have authenticity?

[ O-  
FIC-1  
(ME-  
3)

Sincerely,  
FRIENDS OF ISLAIS CREEK

Robin Chiang

Volunteer Executive Director

-----  
From: "Dan Dodt" <[dodt@icloud.com](mailto:dodt@icloud.com)>  
Date: Oct 29, 2017 1:39 PM  
Subject: BHS LETTERtoPLANNING re- IndiaBasin EIR.pdf  
To: <[michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org)>  
Cc: "Chicuata, Brittini (BOS)" <[brittini.chicuata@sfgov.org](mailto:brittini.chicuata@sfgov.org)>, "Chan, Yoyo (BOS)" <[yoyo.chan@sfgov.org](mailto:yoyo.chan@sfgov.org)>, "Malia Cohen" <[malia.cohen@sfgov.org](mailto:malia.cohen@sfgov.org)>

- > To:
- >
- > Mr. Michael Li
- > San Francisco Planning Department
- > 1650 Mission Street, Suite 400, San Francisco, CA 94103
- > [michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org)
- >
- > Re: CASE NO. 2014 002541ENV INDIA BASIN SHORELINE PARK, 900 INNES AVE., INDIA BASIN
- > OPEN SPACE, AND 700 INNES AVE., SAN FRANCISCO, CALIFORNIA
- >
- >
- > Dear Mr. Li,
- > Please see the attached comments on the INDIA BASIN Shoreline Park Environmental
- > Impacts and proposals. Thanks you,
- >
- > Bayview Historical Society



*Our Mission: To identify and preserve the sites and structures of architectural and historic significance in the Bayview-Hunters Point District, for the benefit of its residents and for the larger San Francisco community.*

*founded in 2004 registered and established public benefit organization: May 1, 2005*

*BHS is a non-profit, public benefit organization, verified under Federal Tax I.D. # 20-8093156*

27 October 2017

Mr. Michael Li  
San Francisco Planning Department  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
michael.j.li@sfgov.org

Re: **CASE NO. 2014 002541ENV** INDIA BASIN SHORELINE PARK, 900 INNES AVE., INDIA BASIN OPEN SPACE, AND 700 INNES AVE., SAN FRANCISCO, CALIFORNIA

Dear Mr. Li,

After reviewing the Draft Environmental Impact Report for the proposed India Basin Mixed-Use Project, with particular attention paid to the Cultural Resources Supporting Information under Appendix C, **The Bayview Historical Society recommends a Full Preservation Alternative** with respect to the Shipwright's Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site, and 838-840 Innes Avenue related structures and pathways.

The Bayview Historical Society commissioned the initial India Basin Historic Survey in 2008, and our members have been active in supporting and advocating for the retention and restoration of cultural resources in the community. We worked with the India Basin Neighborhood Association, in 2006, in their tireless efforts to designate the Shipwright's Cottage at 900 Innes Avenue as San Francisco Landmark #250. In 2013, we initiated a process with the San Francisco Planning Department/ Historic Preservation Commission to cite the prior owners of 900 Innes Avenue due to violation of the U.S. Department of the Interior 'Demolition by Neglect' ordinance. We assembled an archival team to document condition of 900 Innes Avenue, and corresponded with the owners, demanding repairs. Our challenge to SFDBI regarding abatement of repairs resulted in a repair of roofing system at 900 Innes, thus saving the building from further deterioration and loss at the time.



We believe that continuing to preserve this landmarked building is only a part of the story, and that additional preservation of adjacent resources is key to retaining the overall historical significance of the area.

As is noted in the descriptor for the **Full Preservation Alternative**, that action would be 'similar to the proposed project and variant, but would include the rehabilitation to Secretary of Interior (SOI) Standards of all three buildings (the Shipwright's Cottage, the Boatyard Office Building, and the Tool Shed and Water Tank building) that are significant features of the India Basin Scow Schooner Boatyard and contribute to the boatyard's CRHR eligibility. The Full Preservation Alternative would also propose that plantings and new park furniture would be designed to retain the industrial character of the cultural landscape.' We suggest that these comprehensive preservation steps are entirely consistent with the opinions rendered by the senior consultants to the Draft EIR.

For example, the Page and Turnbull Report provides this overview to the Cultural Resources section:

#### SUMMARY OF FINDINGS

This report evaluates five properties, or sub-areas, within the project area determined to be over 50 years in age, therefore considered potentially eligible for listing in the California Register. These sub- areas are: the Shipwright's Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site; 838-840 Innes Avenue; and 702 Earl Street. No other properties or features within the project area are of an age to qualify for listing in the California Register. Page & Turnbull's findings indicate that three California Register-eligible properties exist: the Shipwright's Cottage (previously designated as San Francisco Landmark #250 under Article 10 of the Planning Code); the India Basin Scow Schooner Boatyard site, including three buildings and several objects and landscape features; and the former boatyard building at 702 Earl Street. These properties would therefore be considered historic resources for the purpose of review under the California Environmental Quality Act (CEQA).

**Appendix C\_Cultural Resources Supporting Information\_ Part2:Page and Turnbull Report:  
p3**

Further noted in Appendix C. 3.1.1. , under Federal Regulations, “ Historic Sites Act (1935). The Historic Sites Act, Title 16, Section 461 and following of the United States Code (16 USC 461 et seq.), declares a national policy to preserve historic sites, buildings, antiquities, and objects of national significance, including those located on refuges. The Historic Sites Act provides procedures for designation, acquisition, administration, and protection of such sites.” and “ California Code of Regulations, Title 14, Section 4307. This state preservation law prohibits removal, injury, defacement, or destruction of objects of paleontological, archeological, or historical interest or value.”

We believe that the historical interest in the area is supported by the obvious ‘value’ of the people and activities which are clearly documented and understood. This local, Bayview-based history is largely unknown to many in San Francisco, yet the India Basin activities in the late 19th Century are reflective of the actions and passions of our City’s pioneers.

“Upon relocating to the northern shore of the remote Hunters Point peninsula, the immigrant shipwrights were finally able to begin building scows and other vessels in one location for over half a century without disturbance. Noting the concentration of family-run boatyards in the area, an article in the November 1869 edition of the San Francisco Real Estate Circular stated that “South San Francisco will undoubtedly be one of the most valuable locations for shipbuilding and manufacturing purposes in the county.”<sup>52</sup> The boatyards that operated at India Basin were small-scale and tended to operate with informal verbal contracts. Their boatyards were frequently home-based industries, with their houses located on or near the boatyard properties. Despite their small scale, the manufacturing and repair of hand-made sailing vessels was vital to San Francisco’s distinctive maritime-based economy. According to the 1880 Census schedules, several of the first settlers in India Basin were English, including Albion Brewery’s John Burnell and Reverend George E. Davis, a pioneer from London who moved to the corner of 8th Avenue South (Hudson) and ‘H’ (Hawes) Street in 1873. Other European immigrants who moved to India Basin in the 1860s and 1870s included Netherlands-born Johnson J. Dircks (1869), William Munder (1869), Hermann Metzendorf (1872), Edmund Manfred (1875), and Fred Siemer (1886), all from Germany. Ireland contributed John McKinnon (1868) and James Pyne. Denmark was a primary source of boat builders, including O.F.L. Farenkamp (1877), Henry Anderson (1893), and Otto Hansen.

The first known shipwright to move to India Basin was Johnson J. Dircks. He established a yard at the corner of 5th Avenue South (Evans) and 'L' (Lane) Street in 1868. Not long after, in 1871, William Stone moved his yard from Potrero Point to 9th Avenue South (Innes), near 'G' (Griffith) Street. In 1876, Dircks moved all of his operations to a site next to Stone's on 9th Avenue South.<sup>54</sup> By 1880, Dircks' and Stone's sons began to apprentice with their fathers. The passing on of knowledge and craft was a common cultural practice among the boat-building families of India Basin; indeed most of the men who had migrated to the area had learned the craft from their fathers in Europe. The shipwrights in India Basin – Dircks, Stone, Siemer, and Anderson – passed on their craft to their native-born American sons, thereby developing a longstanding tradition of boatbuilding in the neighborhood that would last three generations.<sup>55</sup> 1883 Coast Survey Map The 1883 U.S. Coast Survey map is the first map to illustrate the extensive changes that had occurred.”

**India Basin Historic Survey/KVP pp.27 Bayview Historical Society publication 2008**

A letter from Johnson J. Dircks great, great grandson, Brian Dircks, is attached to this correspondence and captures his spirit when celebrating the 900 Innes Avenue Shipwrights's Cottage in 2014. As part of the Cultural Resources appendix in the Draft EIR, the cottage is further linked to the larger historical context which clearly includes the India Basin Scow Schooner Boatyard and other resources.

#### 5.1.1. Shipwright's Cottage

As indicated in the HRE (Page & Turnbull, 2016:6), the Shipwright's Cottage at 900 Innes Avenue was found individually eligible for listing in the CRHR by KVP under Criteria 1 and 3 “due to its association with resident shipwrights employed in the boat yards of India Basin and as a rare example of a very early Italianate cottage. It is only one of two remaining nineteenth-century dwellings (the other being 911 Innes) in India Basin.” The period of significance for the Shipwright's Cottage was identified as 1870–1938, the fullest possible period considered by the survey.

In 2008, in light of the KVP effort (2008) the Shipwright's Cottage was designated San Francisco Article 10 Landmark #250. The building's designation nomination encompasses only the residence and no surrounding features. The Landmark Designation Report completed for the Shipwright's Cottage found the building to be significant under Criteria A (Events) and C (Architecture), and specified the period of significance as 1870–1930 (which encompasses several years before the building's construction around 1875) (Page & Turnbull, 2016:7).

**Appendix C\_Cultural Resources Supporting Information\_ Part2:Page and Turnbull Report**

### 5.1.3. India Basin Scow Schooner Boatyard

The KVP survey (2008) also identified a potential CRHR-eligible historic district, the India Basin Boatyards Historic District, comprising numerous buildings and other landscape features across eight parcels once associated with the Anderson & Cristofani and adjoining Allemand Brothers Boatyards. A DPR 523D (District Record) form was completed for this district, listing the period of significance as 1893 to 1935. According to Page & Turnbull (2016:6), KVP identified numerous resources within the boundaries of the district but did not specify contributors and noncontributors. Page & Turnbull further noted (2016:6) that several of these listed resources were constructed outside of the identified period of significance. Page & Turnbull refined KVP's assessment, determining that the boatyard site is most appropriately defined as a vernacular cultural landscape, a type of property that has "evolved through use by the people whose activities or occupancy shaped that landscape. Through social or cultural attitudes of an individual, family, or a community, the landscape reflects the physical, biological, and cultural character of those everyday lives" (Birnbaum, 1994). The India Basin Scow Schooner Boatyard, as it was subsequently designated by Page & Turnbull (2016:19), aligns in some respects with the India Basin Boatyards Historic District that KVP previously identified, although Page & Turnbull has determined that the property is more appropriately described as a site than as a historic district given its numerous landscape features (natural and manmade) that convey its significance (2016:99). The beginning of the India Basin Scow Schooner Boatyard's period of significance is 1875, the year that Johnson Dircks first established a boatyard at the site, which was later acquired by Henry Anderson and expanded as the Anderson & Cristofani Boatyard. Page & Turnbull (2016:99) finds that 1936 is the most appropriate end date of the period of significance as this year marks the opening of the of the San Francisco–Oakland Bay Bridge. From this point forward, the transportation of goods via vehicle (as opposed to vessel) became predominant in the Bay Area and marks the ultimate end of the era in which wood watercraft (the boatyard's specialty) was integral to the Bay Area's transport economy (Page & Turnbull, 2016:99).

**The India Basin Scow Schooner Boatyard is characterized by a range of built and natural features that date to this decades- long use as a boatbuilding and repair yard—including six buildings, four structures, and several small-**

**scale features, in addition to topography, views, circulation routes, and bodies of water**(Plate 1). These features continue to convey the spatial and functional relationships that defined the operations of the yard and can be internal to or external to the property boundaries.

**Page & Turnbull (2016:99) determined that the India Basin Scow Schooner Boatyard site is: historically significant site under Criterion 1, for its associations with San Francisco’s wood scow schooner building and repair industry that was centered at India Basin.** Scow schooners were integral to the transportation of goods throughout the San Francisco Bay area during the late nineteenth and early twentieth centuries, prior to the era of widespread automobile use and bridge construction. The remote settlement of immigrant shipwrights at India Basin was responsible for building and repairing such vessels and represented an important working community that, while off the beaten path, supported the region’s economy through skilled workmanship. Due to gradual development around India Basin and dramatic infilling of the shoreline, much of the landscape conveying the previous era of shipbuilding no longer exists. As the site of the longest consecutively operating boatyards at India Basin, the India Basin Scow Schooner Boatyard is the best remaining physical representation of the area’s significant working class community.

The India Basin Scow Schooner Boatyard as defined by Page & Turnbull is particularly relevant to the current investigation because any historic maritime archeological resources occurring in the APE, specifically those that relate to the local boatbuilding industry during the period of 1875–1936, would potentially be contributing features to this vernacular cultural landscape site. Table 2 lists the elements of the India Basin Scow Schooner Boatyard and their construction dates, and identifies whether they are considered contributing features.

**Appendix C\_Cultural Resources Supporting Information\_ Part1: Aecom Report: Section 5.1.3. Archeological Survey Report India Basin Mixed-Use Project**

The 'contributing' status of various buildings, pathways and other resources as outlined in Table 2, attached to the above Appendix C, Part1, AecomReport Sect. 5.1.3 provides a guideline for designing and implementing the Full Preservation Alternative. The significance of the the area is further articulated in these comments regarding eligibility for inclusion in the California Historic Register.

#### INDIA BASIN SCOW SCHOONER BOATYARD California Register Eligibility Criterion 1

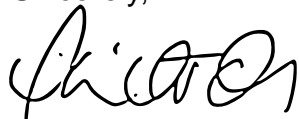
Page & Turnbull finds that the India Basin Scow Schooner Boatyard site, a boat building and repair yard in operation beginning in the 1870s, is a historically significant site under Criterion 1, for its associations with San Francisco's wood scow schooner building and repair industry that was centered at India Basin.

Some aspects of the site's integrity, namely materials and workmanship, are somewhat compromised. Most features within the property have been neglected and are in various states of decay and collapse, or are heavily overgrown to the point that original materials, design features, and workmanship cannot be fully conveyed. In spite of these issues, Page & Turnbull considers that enough features remain at the site to convey the significant overall functional relationships that have characterized the boatyard for many decades. The India Basin Scow Schooner Boatyard is therefore considered to have adequate overall integrity to convey its historical significance.

**Appendix C\_Cultural Resources Supporting Information\_ Part2:Page and Turnbull Report  
INDIA BASIN PROJECT HISTORIC RESOURCE EVALUATION PARTS 1 AND 2 March, 2017**

Thank you for considering our comments. We respectfully suggest that a Full Preservation Alternative for the Shipwright's Cottage at 900 Innes Avenue; the India Basin Scow Schooner Boatyard site at 900 Innes Avenue; the Allemand Brothers Boatyard site, and 838-840 Innes Avenue related structures and pathways be thoroughly considered during your review of the Draft EIR for the India Basin Mixed Use Project.

Sincerely,



Dan Dodt  
President, Bayview Historical Society

cc: BHS Board and membership; IBNA; BayviewCAC

**Speech by Brian Dirks**  
**Community Celebration of City of San Francisco Purchase of 900 Innes**  
**India Basin**  
**Sept. 18, 2014**

What an honor to be here. It is truly wonderful that so much has been done to transfer this small plot of land into public ownership so that it can remain a permanent fixture of the Bay Area's rich maritime heritage.

For me to be standing by the house that was first inhabited by my great-grandfather's grandfather, the first on the Dutch side of my family to settle in America, seems like a great homecoming - even if it has been more than 10 dozen years since a Dirks lived here. Reading about the other well-known shipwrights who also lived in this house and in neighboring houses no longer standing makes this an especially historic location. What happened here all of those years ago certainly had a multi-generational influence on my family that continues to this day.

Seeing the house makes me wonder if any or all of his six children lived here too. The place doesn't look big enough for that.

Here's what my great-uncle, the late George Dirks of Walnut Creek, wrote about his great-grandfather:

“Jan Janse Dirks, born 1825, arrived in San Francisco from Holland on a German sailing ship in 1851. He was the ship’s carpenter, but after sailing around Cape Horn, he felt he had enough of life on the seas and he jumped ship to make a new life in San Francisco. He was six feet, six inches tall and strong as an ox. His friends called him “Long John” or “Honest John the Hollander.”

Long John started a ship repair shop on Potrero at the foot of Sixteenth Street. He began building scows in the Islais Creek area that became known as Butchertown, due to the rendering plants and slaughterhouses there.

I like that John Dirks was the first shipwright to settle here at India Basin in 1868, possibly because he couldn’t take the stench from Butchertown, but also that he likely saw a lot of opportunity to grow his business on these shores. That made him a true entrepreneur, as well as a pioneer.

Jan J. married a German-born woman, Gesa Dammann 1854. Their kids were John A. Minny, Delia, Henry, Ellen and George Jesse Dirks.

Through the generations we have lost track of any descendents of the older five. Their youngest, George Jesse, was my great-great grandfather.

George Jesse continued in the maritime trade. We know he worked at the Matthew Turner shipyard in Benicia, where he was the boss caulker and his son, George Oliver Dirks, served his caulking apprenticeship. One of the ships they built was The Equator, a two-masted pygmy trading schooner that carried passengers Robert Louis Stevenson and his wife, Fanny, on a voyage through the islands of



Micronesia and was the inspiration of the story, "The Wrecker," in his book: "Tales of the South Seas."

The story goes that the newly built 80-foot Equator and the British battleship Calliope were the only ships to ride out the great Samoan hurricane of March, 1889, where winds raged up to 200 miles per hour and cast waves 80-feet high. The storm destroyed three American and three German ships of war and cost hundreds of lives. No one dreamed the relatively small vessel Equator could survive it. But she did, certainly due in no small part to the expert building and watertight caulking by George Jesse Dirks and his crew to make her so buoyant. By the way, the Equator spent her final days as a tug in Puget Sound and still stands in dry dock in the Port of Everett, in desperate need for a little Tender Loving Care.

My own grandfather, Clarence Oliver Dirks, also was also a caulker, learning the trade from his father George Oliver (son of George Jesse). He quit school for a time in the eighth grade so that he could work in the shipyards during World War I, which he did again during World War II. He attended high school in Palo Alto where he became an All-American football player – probably helped by the muscles he'd built up swinging the big sledgehammer-like caulking tool known as a beetle.

Clarence was recruited by the University of Washington in 1926 and was named captain of the Huskies in 1928. Later as a sportswriter for the Seattle P-I he

covered the UW's crew team in the years leading up to their Gold Medal victory against Nazi Germany in the 1936 Olympics. He became a well-read newspaper columnist for the P-I as well as a farmer and lay preacher, but continued to supplement his income as a ship caulker until he was well into his 70s. I remember that he always had one wood-planked boat or another behind his barn to work on too, in fact he gave us one for Christmas one year. Most of our family's caulking tools were donated to the Maritime Museum here in San Francisco but we still have some mallets and other stray tools on a garage shelf.

My own father, Martin Dirks, became a prominent civil engineer in Seattle and never worked in the maritime business, nor did any of his five sons – including my younger (and much taller) brother, John Dirks. But we all have a great love of boating and the water that we inherited from our forefathers. My uncle Mike Dirks raised two sons in Spokane, one of whom is on temporary leave as a developer from his job at YouTube here in the Bay area.

My dad, now 80, has as one of his proudest possessions an ornate gold pocket watch made by a jeweler in Sacramento that belonged to Jan Janse Dirks.

John J. Dirks lived to age of 92 and is buried over in San Mateo County with Gesa and two of their children. An interesting footnote to his story is that a few years following the death of his beloved Gesa in 1891 the old man apparently remarried a much younger woman named Sarah. He made her sign a pre-nup but she welched on it that very afternoon. After she died – we don't know how – he sued the trust

company handling her estate for the squandered sum, a case that made it all the way to the California Supreme Court. They found for Dirks.

So Jan Janse won, just as the residents of India Basin and the whole Bay area won by their dedication to this property and the important history that it holds. Once again our family is very grateful for all you have done, and for the opportunity to be a small part of this lasting legacy and common birthright. Thank you.

Hello Bayview Historical Society,

Thank you again for your gracious offer to subsidize Brian Dirk's trip to participate in the 900 Innes ribboncutting!

His airfare receipt is attached - as you can see, the flight alone was close to \$600; with lodging and transit, the total journey ran about \$900, so your \$400 contribution really did make the difference in enabling him to be there to represent his family and the history of the site.

If you would, please mail a check made to "Brian Dirks" to 35432 26th Place S., Federal Way, WA 98003.

I'm also happy to share a writeup of Brian's comments at the celebration (also attached), for the BHS records.





*Our Mission: To identify and preserve the sites and structures of architectural and historic significance in the Bayview-Hunters Point District, for the benefit of its residents and for the larger San Francisco community.  
founded in 2004 registered and established public benefit organization: May 1, 2005*

**Representative Projects:**

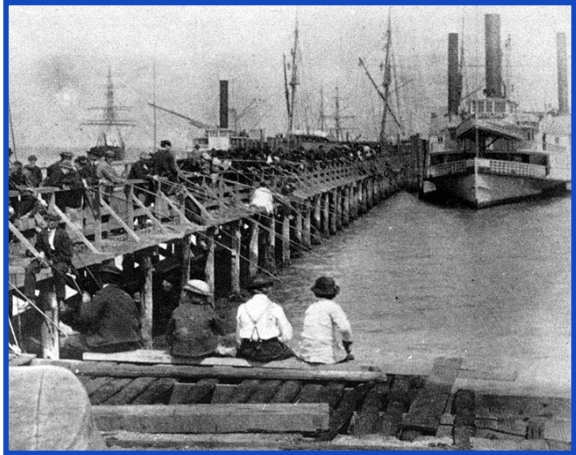


**2005** House histories in Bayview. Conducted photographic and preliminary survey of historic structures in area. Coordinated work w/SF Public Library.

Sylvester House, ca. 1865 receives Robert Friese Award for Historic Preservation from San Francisco Beautiful.

**2006** Landmark Support – 900 Innes Support of India Basin neighbors for presentations and testimony to advocate for landmark status of Shipwrights Cabin on Innes Avenue.

**2007** Hunters Point Power Plant. Support of India Basin neighbors in opposition to improper and non-permitted demolition of PGE plant. Leads to Boss/Lantsberg effort to create India Basin Survey.



**2008** India Basin Historic Survey Authored by: Chris Ver Planck - historian. Published documentation by BHS. Public Presentation of Survey to BVHP-PAC; Public Presentation of Survey to SFBOS.

**2009** Drafted Peskin amendment to Bayview Redevelopment Plan adoption; adopted by SFBOS and incorporated into BVHP Redevelopment Plan.

Proposal to SFRA for historic survey of all Bayview neighborhoods - awarded to AAHS.





**2010** Continued collaboration w/San Francisco Public Library Bayview Branch - historical archive.



**2012** Joined with BVOCP in challenge to demolition of Berkeley Farms center. Settlement and legislative modifications to San Francisco Planning re: Berkeley Farms distribution center and PDR notification.



**2013** Challenge to SF Planning Department/ Historic Preservation Commission to cite owners of 900 Innes due to violation of 'Demolition by Neglect' ordinance. Assemble archival team to document condition of 900 Innes Avenue. Correspondence to owners of 900 Innes and SF Planning demanding repairs. Joined with IBNA to challenge at DBI regarding abatement of repairs. Realized repair of roofing system at 900 Innes. Continued advocacy for future preservation of this S.F. Landmark #250.

**2014** Chinese Whispers:BC Shrimp Junk Sail to Bayview - Lead Community Sponsor. Co-sponsor of BRITELights on 3rd installation. Proposed Sculpture relocation to Bayview Town Center -The REDFISH project. House and Site Histories -Bayview outreach to property owners. Membership Drive 2014.

Photographs of Bayview, Butchertown, Islais Creek, India Basin property of: Bancroft Library Collection; San Francisco Public Library; Bayview Library Archive; private collections. The Bayview Historical Society is an educational, cultural and historical public benefit organization, not-for-profit, with fiscal sponsorship provided by the 501(c)3 registered Bayview Multi-purpose Senior Services.



**2015** The REDFISH project: relocation and securing of original sculpture by William Wareham- HPS artist to SF Port location; House and Site Histories -Bayview outreach to property owners; Pro-Bono partnership with Bayview Community Planning and sponsorship of artBAYVIEW- a GPS and geo-mapping of public art sites in the Bayview District. Coordination and planning efforts with STAR

(Shipyard Trust for the Arts) for support of

historic survey and historic district designation for Hunters Point Shipyard - pending; Correspondence and support of Midway Project, Mendell Plaza historic resources, etc.

**2016** Planning for 'Bayview History Night' event tbd in Bayview District. Outreach to African-American Historical Society and California Historical Society. Pro-Bono partnership with Bayview Community Planning and EDoT for creation of the T-Line Newsletter. Continued updating of artBAYVIEW- geo-mapping of public art sites in the Bayview District.



**2017 in progress:** Proposed support and co-sponsorship of the Bayview Education Endowment; Support of India Basin Projects and historic survey updates; Redfish Project; Bayview History Night planning.



*inspiring people to protect  
Bay Area birds since 1917*



O-  
GGAS/SC

October 30, 2017

Golden Gate Audubon  
2530 San Pablo Ave, Suite G  
Berkeley, CA 94602

Sierra Club, San Francisco Bay Chapter  
2530 San Pablo Ave.  
Berkeley, CA, 94602

Via US Mail and email

Mr. Michael Li  
San Francisco Environmental Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
michael.j.li@sfgov.org

**Re: DEIR India Basin Open Space and Shoreline Park**

Dear Michael Li:

Thank you for the opportunity to comment on the India Basin Shoreline Park and Build Inc. development project.

Golden Gate Audubon has been protecting birds and bird habitat for 100 years by connecting local community members to the rich birdlife and ecosystems of our Bay shorelines. Founded in 1917, Golden Gate Audubon Society engages people to experience the wonder of birds and translate that wonder into meaningful actions that protect Bay Area native bird populations and the habitats they need.

Golden Gate Audubon Society is among the largest and most active chapters of National Audubon, it's also among the most highly regarded conservation organizations in the Bay Area. We are supported by over 7,000 members and engage nearly 3,000 volunteers on an annual basis. This year marks our 100<sup>th</sup> anniversary of connecting Bay Area people to the astonishing birdlife that shares our communities, especially our shorelines, with us.



The Sierra Club is the largest membership environmental organization in the United States and has over 8,000 members in San Francisco. The Club is well known for its concerns for both habitat and species protection preservation as well as nature-sensitive recreation.

This proposed project at India Basin provides an opportunity to protect myriad birds, support important bird habitats and to continue to connect local people with our local environment.

To begin this letter we are forced to address the fact that the DEIR is appallingly lacking in addressing the wildlife issues presented in both of our organizations' scoping letters. We believe the DEIR needs to be rewritten and re-circulated in order to address the wildlife issues described below.

CEQA requires that the project look at the entire location. This includes the surrounding areas of Heron's Head Park, Candlestick, and the Bayview.

The presence of migratory waterbirds (duck, grebes and shorebirds) is tossed aside as unimportant in the DEIR at 3:14-53 (bolding by us)

"Migratory Birds:

**Because the project site and surrounding areas are highly developed and disturbed, the San Francisco shoreline in the project area does not provide a movement corridor for terrestrial wildlife.** Open water and tidal habitats along the shoreline provide stopovers for migratory birds along the along the Pacific Flyway, a major migration route in North America. Despite this important habitat for migratory birds, **the current condition of the project area is primarily developed and disturbed, offering only low-quality habitat for birds to forage and nest.** As discussed previously in Impact BI-1a, construction of the project indeed may affect the ability of migratory birds to forage, nest, or stop over in the project vicinity, because habitat would be temporarily removed and both noise levels and human presence would increase. In fact, the construction impact of the proposed project or variant on migratory birds and their corridors could be significant."

This might suggest a concern for migratory waterbirds but in fact it is essentially discussing land bird impacts. This completely ignores the fact that since ducks and geese have open water as their habitat the site's "developed and disturbed" nature is not an applicable statement. Diving ducks feed on fish, shellfish and fish roe. There is no reason to believe that India Basin does not have such species and the DEIR does recognize the presence of fish. The EIR consistently ignores the fact that both writers of this letter are excellent birders and both relate having seen large rafts of ducks (including species such as greater and lesser scaup, surf scoters, ruddy ducks) as well as significant numbers of grebes and geese in India Basin waters, as have other members of our organization and as has been documented on "ebird". We have seen harbor seals in the

O-  
GGAS/SC-1  
(BI-1)

Basin. Our members have seen extensive numbers of shorebirds. In fact, India Basin evidently provides excellent roosting and foraging habitat for these species as indicated by the numbers of species and individuals observed by our members. The DEIR provides no evidence to refute these observations of high waterbird use of the Basin other than the unsubstantiated comment that the project site habitat is disturbed and developed.

To reiterate, open water is by definition not developed. As regards shorebirds, their habitat consists primarily of mudflats and tidal marsh and even riprap. The project site provides a great deal of mudflat, some tidal marsh and riprap; ideal habitats. The fact that most, but far from all, the shoreline of the proposed project consists of “developed and disturbed areas” does not mean it lacks significant habitat value. For example, shorebirds can be found along the entire San Francisco shoreline wherever it is not actually leveed like the Embarcadero.

San Francisco Bay is well known as a critical overwintering site for waterfowl. San Francisco Bay is recognized as a site of Hemispheric Significance for shorebirds, actually. In fact, regarding both waterfowl, grebes and shorebirds, India Basin would be the only basin/inlet on the SF shoreline that would have no waterbird species. For example, Mission Creek, Warm Water Cove, Pier 94, Yosemite Slough all have a significant amount of “disturbance and development” and yet still host large numbers of waterbirds. Even more striking is the number of ducks (including occasionally the Harlequin Duck – a species of special concern) and shorebirds that are found along the shoreline and in the basin between the recycling Pier and Heron’s Head Park.

The fact that the bird survey performed By WRA took place in April confirms the lack of interest in this issue by the DEIR. It is well known that the primary waterfowl migratory season is November to March. Shorebird numbers are also at their highest during the winter months since both ducks and shorebirds are migrating away from the Arctic winter to warmer climates and then migrating back north in the spring in order to take advantage of the springtime food resources of Canada and Alaska. The fact that Appendix K does not identify a single duck or shorebird as present in the project environs (other than Ridgway’s Rail at Heron’s Head Park) once again confirms the seeming intent of the DEIR to ignore the presence of these migratory species for which CEQA requires addressing and mitigating for all impacts. (“The proposed project or variant would interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.”)

Attached please find the bird species observed at India Basin Shoreline Park (109 species), India Basin Open Space (103 species) and Heron's Head Park (176 species). More people that go bird watching in this area today (and submit observations) are visiting Heron’s Head Park since it has public facilities (parking, bike racks, water fountain, restrooms etc.). Many of the bird species travel from one side of India Basin to the other based on the tides, in search of food, or resting

O-  
GGAS/SC-1  
cont'd  
(BI-1)

O-  
GGAS/SC-2  
(BI-1)

areas. There are 25 species of waterfowl, 10 species of loons and grebes, 3 cormorant species, 1 pelican species, 4-6 heron species, 30 shorebirds, 16 gulls, terns and skimmers, plus hawks, falcons, swallows and songbirds. The graphs by month show bird species including those present year-round. With a few exceptions, those species present during the breeding season April-July generally indicates that they breed in this area. This new site has the opportunity to provide more biodiversity than Heron's Head Park since it includes the water, shoreline, marsh and upland.

The failure of the DEIR to identify the presence of any of these migratory waterbird species indicates the complete failure to recognize potential impacts to these species as a result of the project and a concomitant lack of mitigations for any of those impacts. These impacts include disturbance that results in unusual movement, including flushing that depletes the energy reserves of these species, and may even cause complete abandonment of existing habitats.

These species travel long distances in their migration and expend a considerable proportion of their body weight and energy reserves to do so. When they reach an over-wintering location their goal is to gain sufficient calories to enable them to undertake successfully their migration north to their breeding grounds. Failure to achieve sufficient energy resources can lead to death on their migration or failure to reproduce successfully. Studies have shown that a typical diving duck may spend 28% of its time feeding, 57% resting, 11% in locomotion, 4% preening and only 1% in alert behavior. It is easy to see that any added "alert behavior" such as that generated by human disturbance, may have a significant impact on these species.

We submitted numerous studies on the impacts of public access both on land and on water on these water bird species in our scoping submittals. Some of these studies reveal that kayaking can have significant disturbance impacts on waterbird species. The failure to identify the presence of these migratory species and thus the failure to identify impacts and mitigations results in a document that is fatally flawed. It requires that the DEIR be rewritten and re-circulated in order to address these biological resource impacts, especially the failure to address the CEQA issue; Impact BI-4: "The proposed project or variant would interfere with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites."

We have made our concerns known at the many public meetings held by the Department of Recreation and Parks; we have stated that a kayak launching site would have significant impacts to these species. We did suggest that mitigation for those impacts could consist of a seasonal closure of use of the kayak launching sites from November to March (inclusive). Such seasonal closures are already implemented in several locations in the Bay Area. The Department in later meetings agreed to implement such a seasonal closure- but those assurances have evidently been ignored. In fact, the DEIR addresses no such impacts in its Recreation section despite the scientific evidence of the problem as found in our submittals.

O-GGAS/SC-2  
cont'd  
(BI-1)

GGAS/SC-3  
(BI-1)

Other impacts on waterbirds from this project should also be analyzed. Bright night lighting can impact reproductive efforts. Some shorebirds, such as the Black Oystercatcher, breed at Heron's Head in San Francisco. Intense sudden sounds can also disturb shorebird and duck species. The DEIR should address this issue and we believe appropriate mitigations would include instructions that lighting should be minimized and implemented according to the Better Streets Plan and Standards for Bird Safe Buildings. The following URL provides useful suggestions: <http://darksky.org/light-pollution/wildlife/>

O-  
GGAS/SC-4  
(BI-1)

We submit with these comments a study of Snow Plovers performed by K. Lafferty at Coal Oil Point in Santa Barbara<sup>1</sup>. This study indicates the impacts that public access can have on shorebird shoreline habitat. It also includes a solution that we believe can be beneficial to this project. The study found that roping off a relatively small portion of the shorebird habitat (a beach in this case) and instituting a docent educational program that informed the public of the impacts to the shorebirds resulted in significant reduction in impacts and a growth in the shorebird colony -- while having no impact on human visitor numbers or enjoyment.

O-  
GGAS/SC-5  
(BI-1)

The DEIR does acknowledge a mitigation tidal salt marsh that was created as a result of a 2002 wetlands mitigation project for the San Francisco International Airport, and occupies 2.5 acres of the India Basin Open Space. The DEIR admits that these habitat management and protection areas in India Basin Open Space are fenced from public access. However, the DEIR fails to recognize this as an indicator that marshes and the wildlife species that inhabit them do need some measure of protection.

O-  
GGAS/SC-6  
(BI-4)

Taking into account the above, we once again request that the DEIR be rewritten and recirculated in order to address these habitat/disturbance issues.

We believe that if the project and its DEIR genuinely recognize and appropriately mitigate for these impacts, this project could be a tremendous asset to the City providing a variety of recreational experiences and in particular nature experiences that are all too rare in our city. The proposed park and shoreline development at India Basin in San Francisco is an opportunity for the project to provide habitat for a variety of birds – waterbirds, shorebirds, passerines and hawks. There is potential that this site adjacent to San Francisco Bay and with a shoreline and upland area can provide enhanced habitat from the shoreline to the upland with a variety of native plants for birds and other wildlife. The native plants evolved with the native birds, butterflies and other wildlife by providing habitat (food and shelter) and these provide ecosystem benefits. These plants are most likely to survive in our Mediterranean climate, require less water, clean the water that flows to the bay, and sequesters carbon, creating oxygen for people. Many native plants can also help address the anticipated sea level rise issues of erosion and storm surge erosion.

O-  
GGAS/SC-7  
(BI-1)

With proper mitigations such a seasonal kayak closures and appropriately protected habitat areas, ✓

a truly exceptional development may result. First, the DEIR must recognize the presence of the natural resources discussed above and provide the mitigations that would allow both humans and wildlife to thrive.

O-  
GGAS/SC-7  
cont'd  
(BI-1)

Survey conducted only in April missed accounting for the pre presence of bird species at other times of year including overwintering water bird species and early and late migrating species. The nesting season begins as early as January for Great Horned Owls and Anna's Hummingbirds so tree removal or cutting should include nesting surveys according to the best practices – see *Healthy Trees, Healthy Birds*. The newly released California best management practices for tree care and wildlife professionals is a recommended resource to protect wildlife during the project implementation and in future management of the park and shoreline development. See <http://treecareforbirds.com>.

O-  
GGAS/SC-8  
(BI-1)

The project site was a mitigation site from the fill that was placed to create the San Francisco Airport. An endangered plant the California Sea Blight or *Californica Suaeda* was present during the monitoring of the SFIA mitigation project but is no longer present. This is a site that is maintained by SF Rec and Parks Department. Future planting of this endangered plant (California Sea Blight) which formerly was along the shoreline of San Francisco Bay but is now rare due to development and landfill should be facilitated, too. This endangered plant is now thriving nearby at Pier 94 and it is present at Heron's Head Park. SF State University students are studying this plant and shoreline conditions to evaluate planting at additional wetland sites. Maintenance of the shoreline is important. We anticipate this huge shoreline development, adjacent development from the Hunters Point Shipyard and enhancements of the Blue Greenway, Candlestick State Recreation Area as well as population growth in other parts of San Francisco with the need for people to enjoy nature and recreate. All of these changes will make maintenance (removing trash and weeds) critical to maintaining safe healthy habitat for birds and places where the existing and new human residents will recreate. The EIR should address the management of this site. This is an impact that needs to be addressed including funding for the management.

O-  
GGAS/SC-9  
(BI-3)

The project site mentions the adjacent developments at the Hunters Point Shipyard yet this is not considered in the EIR as part of the cumulative impacts. The huge population increase will have dramatic impacts to the shoreline park resource.

O-  
GGAS/SC -  
10  
(BI-5)

Section 3.1 Environmental Planning – The document does not mention the Standards for Bird Safe Buildings as approved by the City of San Francisco and included as a planning ordinance. Standards for Bird Safe Buildings is listed as one of the San Francisco Planning Department ordinances yet the Biological Resources section of the EIR does not mention bird strikes as a risk from the development. The EIR does not list the implementation of the Standards for Bird Safe Building guidelines as a way to address the significant bird strike risk.

O-  
GGAS/SC  
-11  
(BI-2)

The historic interpretive displays should provide public education and outreach regarding the rich natural history of this site along San Francisco Bay and the changes over time including the loss of wetlands and wildlife that the City has experienced. The India Basin Shoreline Park offers a key opportunity to restore, enhance and inform the public about the importance of wetlands especially as climate change and sea level rise threaten these areas. Wetlands cleanse the water that flows into the Bay, create oxygen for people, sequester carbon AND provide habitat for birds and other wildlife. All of these ecological services make wetlands important and make it important to share the benefits of properly respecting and stewarding local wetland habitats for urban communities.

O-  
GGAS/SC-12  
(BI-4)

Land Use – The project proposal includes removal of dilapidated piers and installation of a new pier at a new location for kayak launch and rebuilding piers for commercial use café/beer garden. This requires approval from BCDC.

O-  
GGAS/SC-13  
(RE-1)

We are concerned that open space not lead to concrete sidewalk. As a green city, San Francisco should be designing living shorelines for a resilient future.

No mention is made of the need to protect local and migratory shorebirds and water birds and providing an unambiguous seasonal (winter) shutdown of a kayak launch to be managed by SF Recreation and Parks Department or Port of SF.

O-  
GGAS/SC-14  
(BI-1)

#### Aesthetics

Some recreational activities would be in conflict with birds and other wildlife ; these activities which would harm wildlife should not be permitted ex: fireworks, light shows, release of balloons, candles on the water, drones, (except operated by permitted agencies for emergency situations). Monofilament recycling is required to prevent marine debris. Wildlife-proof trash and recycling containers are necessary, as this is a windy shoreline habitat.

O-  
GGAS/SC-15  
(RE-2)

To protect the birds, other wildlife and people, we support requiring that all dogs be on-leash in the India Basin Shoreline Park, except wthin Build Inc's established designated off-leash play areas within their development.

The EIR does not include information on the site importance for roosting shorebirds and rafts of waterbirds. The kayak launch should be closed from November through March each year so that all these resident and migratory birds can continue to use India Basin and the shoreline for feeding and resting. This should be managed and enforced.

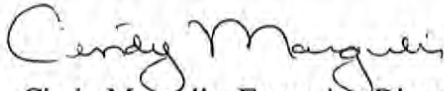
Wetland

5.3.2 Birds – See attached ebird reports. Survey conducted in April missed bird species present at other times of year including large volumes of overwintering water bird species and early and late migrating species. The nesting season begins as early as January for Great Horned Owls and Anna’s Hummingbirds so tree removal or cutting should include nesting surveys according to the best practices

O-  
GGAS/SC-16  
(BI-1)

Thank you for considering these comments on the future of this critical habitat for birds and other wildlife, which is also important for residents and visitors to San Francisco.

Sincerely yours,



Cindy Margulis, Executive Director, Golden Gate Audubon

&

Arthur Feinstein, for Sierra Club



☆ See Attachment:  
eBird Checklist & Data (2017)

<sup>1</sup> Lafferty, K.D., Goodman, D. & Sandoval, C.P. Biodivers Conserv (2006) 15: 2217.  
<https://doi.org/10.1007/s10531-004-7180-5>

# eBird Field Checklist

## India Basin Open Space

San Francisco, California, US

[ebird.org/ebird/hotspot/L1069923](http://ebird.org/ebird/hotspot/L1069923)

103 species (+3 other taxa) - Year-round, All Years

**Date:** \_\_\_\_\_  
**Start Time:** \_\_\_\_\_  
**Duration:** \_\_\_\_\_  
**Distance:** \_\_\_\_\_  
**Party Size:** \_\_\_\_\_  
**Notes:** \_\_\_\_\_

This checklist is generated with data from eBird ([ebird.org](http://ebird.org)), a global database of bird sightings from birders like you. If you enjoy this checklist, please consider contributing your sightings to eBird. It is 100% free to take part, and your observations will help support birders, researchers, and conservationists worldwide.

Go to [ebird.org](http://ebird.org) to learn more!

### Waterfowl

\_\_\_ Snow Goose  
 \_\_\_ Canada Goose  
 \_\_\_ Eurasian Wigeon  
 \_\_\_ American Wigeon  
 \_\_\_ Mallard  
 \_\_\_ Tufted Duck  
 \_\_\_ Greater Scaup  
 \_\_\_ Lesser Scaup  
 \_\_\_ Greater/Lesser Scaup  
 \_\_\_ Harlequin Duck  
 \_\_\_ Surf Scoter  
 \_\_\_ Bufflehead  
 \_\_\_ Common Goldeneye  
 \_\_\_ Common Merganser  
 \_\_\_ Ruddy Duck

### Loons and Grebes

\_\_\_ Red-throated Loon  
 \_\_\_ Common Loon  
 \_\_\_ Pied-billed Grebe  
 \_\_\_ Horned Grebe  
 \_\_\_ Red-necked Grebe  
 \_\_\_ Eared Grebe  
 \_\_\_ Western Grebe  
 \_\_\_ Clark's Grebe  
 \_\_\_ Western/Clark's Grebe

### Cormorants and Anhingas

\_\_\_ Double-crested Cormorant

### Pelicans

\_\_\_ Brown Pelican

### Hérons, Ibis, and Allies

\_\_\_ Great Blue Heron  
 \_\_\_ Great Egret  
 \_\_\_ Snowy Egret  
 \_\_\_ Black-crowned Night-Heron

### Vultures, Hawks, and Allies

\_\_\_ Turkey Vulture  
 \_\_\_ Osprey  
 \_\_\_ White-tailed Kite  
 \_\_\_ Red-tailed Hawk

### Rails, Gallinules, and Allies

\_\_\_ American Coot

### Shorebirds

\_\_\_ Black-necked Stilt  
 \_\_\_ American Avocet  
 \_\_\_ Black Oystercatcher  
 \_\_\_ Black-bellied Plover  
 \_\_\_ Semipalmated Plover  
 \_\_\_ Killdeer  
 \_\_\_ Whimbrel  
 \_\_\_ Long-billed Curlew  
 \_\_\_ Sanderling  
 \_\_\_ Dunlin  
 \_\_\_ Baird's Sandpiper  
 \_\_\_ Least Sandpiper  
 \_\_\_ Western Sandpiper  
 \_\_\_ Short-billed Dowitcher  
 \_\_\_ Wilson's Snipe  
 \_\_\_ Spotted Sandpiper  
 \_\_\_ Greater Yellowlegs



- Willet  
 Lesser Yellowlegs  
**Gulls, Terns, and Skimmers**  
 Bonaparte's Gull  
 Mew Gull  
 Ring-billed Gull  
 Western Gull  
 California Gull  
 Herring Gull  
 Iceland Gull  
 Glaucous-winged Gull  
 gull sp.  
 Caspian Tern  
 Forster's Tern  
 Elegant Tern  
**Pigeons and Doves**  
 Rock Pigeon  
 Eurasian Collared-Dove  
**Hummingbirds**  
 Anna's Hummingbird  
**Kingfishers**  
 Belted Kingfisher  
**Woodpeckers**  
 Northern Flicker  
**Falcons and Caracaras**  
 American Kestrel  
 Merlin  
 Peregrine Falcon  
**Tyrant Flycatchers: Pewees, Kingbirds, and Allies**  
 Black Phoebe
- Say's Phoebe  
**Shrikes**  
 Loggerhead Shrike  
**Jays, Magpies, Crows, and Ravens**  
 California Scrub-Jay  
 American Crow  
 Common Raven  
**Martins and Swallows**  
 Barn Swallow  
**Penduline-Tits and Long-tailed Tits**  
 Bushtit  
**Wrens**  
 House Wren  
**Thrushes**  
 American Robin  
**Catbirds, Mockingbirds, and Thrashers**  
 Northern Mockingbird  
**Starlings and Mynas**  
 European Starling  
**Wagtails and Pipits**  
 American Pipit  
**Waxwings**  
 Cedar Waxwing  
**Wood-Warblers**  
 Yellow Warbler  
 Palm Warbler  
 Yellow-rumped Warbler  
**New World Sparrows**  
 Fox Sparrow  
 White-crowned Sparrow
- Golden-crowned Sparrow  
 Savannah Sparrow  
 Song Sparrow  
 Lincoln's Sparrow  
 California Towhee  
**Cardinals, Grosbeaks, and Allies**  
 Western Tanager  
**Blackbirds**  
 Western Meadowlark  
 Red-winged Blackbird  
 Brown-headed Cowbird  
 Brewer's Blackbird  
**Finches, Euphonias, and Allies**  
 House Finch  
 American Goldfinch  
**Old World Sparrows**  
 House Sparrow

This field checklist was generated using eBird (ebird.org)



103 species (+3 other taxa)

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<u>Great Blue Heron</u>	MAP	█	█	█	█								█
<u>Great Egret</u>	MAP	█	█	█	█							█	█
<u>Snowy Egret</u>	MAP	█	█	█	█			█				█	█
<u>Black-crowned Night-Heron</u>	MAP	█	█	█	█							█	█
<hr/>													
<u>Turkey Vulture</u>	MAP								█				
<u>Osprey</u>	MAP	█	█	█	█								
<u>White-tailed Kite</u>	MAP				█								
<u>Red-tailed Hawk</u>	MAP	█	█	█	█								█
<u>American Coot</u>	MAP	█	█	█	█								█
<u>Black-necked Stilt</u>	MAP	█	█	█	█							█	█
<u>American Avocet</u>	MAP	█	█	█	█								
<u>Black Oystercatcher</u>	MAP	█	█	█	█			█	█				█
<u>Black-bellied Plover</u>	MAP	█	█	█	█				█				█
<u>Semipalmated Plover</u>	MAP	█	█	█	█				█				
<u>Killdeer</u>	MAP	█	█	█	█			█				█	
<u>Whimbrel</u>	MAP	█	█	█	█				█			█	█
<u>Long-billed Curlew</u>	MAP			█				█					█
<u>Sanderling</u>	MAP	█	█	█	█								
<u>Dunlin</u>	MAP			█									█
<hr/>													
<u>Baird's Sandpiper</u>	MAP	█	█		█				█				
<u>Least Sandpiper</u>	MAP	█	█	█	█				█				█
<u>Western Sandpiper</u>	MAP	█	█	█	█				█				
<u>Short-billed Dowitcher</u>	MAP	█	█	█	█								
<u>Wilson's Snipe</u>	MAP	█	█	█	█								
<u>Spotted Sandpiper</u>	MAP	█	█	█	█				█				█
<u>Greater Yellowlegs</u>	MAP	█	█	█	█			█	█				█
<u>Willet</u>	MAP	█	█	█	█			█	█			█	█
<u>Lesser Yellowlegs</u>	MAP	█	█	█	█			█	█				
<u>Bonaparte's Gull</u>	MAP	█	█	█	█								
<u>Mew Gull</u>	MAP	█	█	█	█								█
<u>Ring-billed Gull</u>	MAP	█	█	█	█				█				
<u>Western Gull</u>	MAP	█	█	█	█			█	█			█	█
<u>California Gull</u>	MAP	█	█	█	█			█	█			█	█
<u>Herring Gull</u>	MAP	█	█	█	█								
<hr/>													
<u>Iceland Gull</u>	MAP	█	█	█	█								
<u>Glaucous-winged Gull</u>	MAP	█	█	█	█								
<u>gull sp.</u>	MAP	█	█	█	█								█

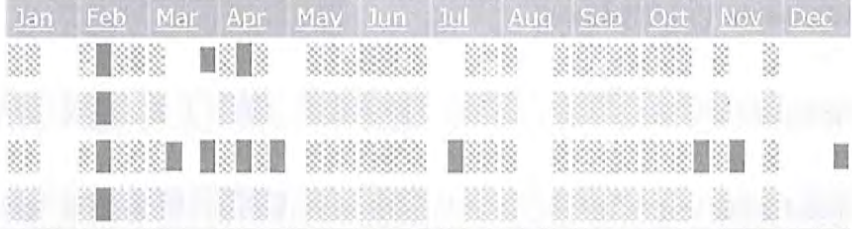
103 species (+3 other taxa)

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Caspian Tern</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Forster's Tern</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Elegant Tern</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Rock Pigeon</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Eurasian Collared-Dove</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Anna's Hummingbird</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Belted Kingfisher</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Northern Flicker</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">American Kestrel</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Merlin</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Peregrine Falcon</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Black Phoebe</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Say's Phoebe</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Loggerhead Shrike</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">California Scrub-Jay</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">American Crow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Common Raven</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Barn Swallow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Bushtit</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">House Wren</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">American Robin</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Northern Mockingbird</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">European Starling</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">American Pipit</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Cedar Waxwing</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Yellow Warbler</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Palm Warbler</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Yellow-rumped Warbler</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Fox Sparrow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">White-crowned Sparrow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Golden-crowned Sparrow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Savannah Sparrow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Song Sparrow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Lincoln's Sparrow</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">California Towhee</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Western Tanager</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Western Meadowlark</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Red-winged Blackbird</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█

103 species (+3 other taxa)

[Brown-headed Cowbird](#)

MAP



[House Sparrow](#)

MAP



**KEY:** [Pattern] = insufficient data | [Tapered Triangle] = rare to widespread

[Download Histogram Data](#)



Connect with eBird — Subscribe to our Email Newsletter

Enter your email address...

Subscribe

The latest news about eBird, birding, ornithology, and conservation delivered to your inbox.

© Cornell Lab of Ornithology | [Contact](#) | [FAQ](#)

# eBird Field Checklist

## India Basin Shoreline Park

San Francisco, California, US

[ebird.org/ebird/hotspot/L590792](http://ebird.org/ebird/hotspot/L590792)

109 species (+6 other taxa) - Year-round, All Years

**Date:** \_\_\_\_\_  
**Start Time:** \_\_\_\_\_  
**Duration:** \_\_\_\_\_  
**Distance:** \_\_\_\_\_  
**Party Size:** \_\_\_\_\_  
**Notes:** \_\_\_\_\_

This checklist is generated with data from eBird ([ebird.org](http://ebird.org)), a global database of bird sightings from birders like you. If you enjoy this checklist, please consider contributing your sightings to eBird. It is 100% free to take part, and your observations will help support birders, researchers, and conservationists worldwide.

Go to [ebird.org](http://ebird.org) to learn more!

### Waterfowl

\_\_\_ Brant  
 \_\_\_ Cackling Goose  
 \_\_\_ Canada Goose  
 \_\_\_ Northern Shoveler  
 \_\_\_ Eurasian Wigeon  
 \_\_\_ American Wigeon  
 \_\_\_ Mallard  
 \_\_\_ Greater Scaup  
 \_\_\_ Lesser Scaup  
 \_\_\_ Greater/Lesser Scaup  
 \_\_\_ Harlequin Duck  
 \_\_\_ Surf Scoter  
 \_\_\_ Bufflehead  
 \_\_\_ Common Goldeneye  
 \_\_\_ Ruddy Duck

### Loons and Grebes

\_\_\_ Common Loon  
 \_\_\_ Pied-billed Grebe  
 \_\_\_ Horned Grebe  
 \_\_\_ Eared Grebe  
 \_\_\_ Western Grebe  
 \_\_\_ Clark's Grebe  
 \_\_\_ Western/Clark's Grebe

### Cormorants and Anhingas

\_\_\_ Pelagic Cormorant  
 \_\_\_ Double-crested Cormorant

### Pelicans

\_\_\_ Brown Pelican

### Hérons, Ibis, and Allies

\_\_\_ Great Blue Heron  
 \_\_\_ Great Egret  
 \_\_\_ Snowy Egret  
 \_\_\_ Black-crowned Night-Heron

### Vultures, Hawks, and Allies

\_\_\_ Turkey Vulture  
 \_\_\_ Osprey  
 \_\_\_ Sharp-shinned Hawk  
 \_\_\_ Cooper's Hawk  
 \_\_\_ Red-shouldered Hawk  
 \_\_\_ Red-tailed Hawk

### Rails, Gallinules, and Allies

\_\_\_ American Coot

### Shorebirds

\_\_\_ Black-necked Stilt  
 \_\_\_ American Avocet  
 \_\_\_ Black Oystercatcher  
 \_\_\_ Black-bellied Plover  
 \_\_\_ Semipalmated Plover  
 \_\_\_ Killdeer  
 \_\_\_ Whimbrel  
 \_\_\_ Long-billed Curlew  
 \_\_\_ Marbled Godwit  
 \_\_\_ Dunlin  
 \_\_\_ Least Sandpiper  
 \_\_\_ Western Sandpiper  
 \_\_\_ peep sp.  
 \_\_\_ Short-billed Dowitcher  
 \_\_\_ Long-billed Dowitcher

\_\_\_ Short-billed/Long-billed Dowitcher  
 \_\_\_ Spotted Sandpiper  
 \_\_\_ Greater Yellowlegs  
 \_\_\_ Willet

#### Gulls, Terns, and Skimmers

\_\_\_ Mew Gull  
 \_\_\_ Ring-billed Gull  
 \_\_\_ Western Gull  
 \_\_\_ California Gull  
 \_\_\_ Herring Gull  
 \_\_\_ Iceland Gull  
 \_\_\_ Glaucous-winged Gull  
 \_\_\_ gull sp.  
 \_\_\_ Least Tern  
 \_\_\_ Caspian Tern  
 \_\_\_ Forster's Tern  
 \_\_\_ Elegant Tern

#### Pigeons and Doves

\_\_\_ Rock Pigeon  
 \_\_\_ Eurasian Collared-Dove  
 \_\_\_ Mourning Dove

#### Swifts

\_\_\_ White-throated Swift

#### Hummingbirds

\_\_\_ Anna's Hummingbird

#### Kingfishers

\_\_\_ Belted Kingfisher

#### Woodpeckers

\_\_\_ Downy Woodpecker  
 \_\_\_ Northern Flicker

#### Falcons and Caracaras

\_\_\_ American Kestrel  
 \_\_\_ Merlin

#### Tyrant Flycatchers: Pewees, Kingbirds, and Allies

\_\_\_ Black Phoebe  
 \_\_\_ Say's Phoebe  
 \_\_\_ Tropical Kingbird  
 \_\_\_ Western Kingbird

#### Jays, Magpies, Crows, and Ravens

\_\_\_ California Scrub-Jay  
 \_\_\_ American Crow  
 \_\_\_ Common Raven

#### Martins and Swallows

\_\_\_ Barn Swallow

#### Tits, Chickadees, and Titmice

\_\_\_ Chestnut-backed Chickadee

#### Penduline-Tits and Long-tailed Tits

\_\_\_ Bushtit

#### Kinglets

\_\_\_ Ruby-crowned Kinglet

#### Thrushes

\_\_\_ Hermit Thrush  
 \_\_\_ American Robin

#### Catbirds, Mockingbirds, and Thrashers

\_\_\_ Northern Mockingbird

#### Starlings and Mynas

\_\_\_ European Starling

#### Wagtails and Pipits

\_\_\_ American Pipit

#### Wood-Warblers

\_\_\_ Orange-crowned Warbler  
 \_\_\_ Common Yellowthroat  
 \_\_\_ Yellow Warbler  
 \_\_\_ Yellow-rumped Warbler

#### New World Sparrows

\_\_\_ White-crowned Sparrow  
 \_\_\_ Golden-crowned Sparrow  
 \_\_\_ Vesper Sparrow  
 \_\_\_ Savannah Sparrow  
 \_\_\_ Song Sparrow  
 \_\_\_ Lincoln's Sparrow  
 \_\_\_ California Towhee

#### Cardinals, Grosbeaks, and Allies

\_\_\_ Western Tanager

#### Blackbirds

\_\_\_ Western Meadowlark  
 \_\_\_ Hooded Oriole  
 \_\_\_ Red-winged Blackbird  
 \_\_\_ Brown-headed Cowbird  
 \_\_\_ Brewer's Blackbird  
 \_\_\_ blackbird sp.

#### Finches, Euphonias, and Allies

\_\_\_ House Finch  
 \_\_\_ Lesser Goldfinch  
 \_\_\_ American Goldfinch

#### Old World Sparrows

\_\_\_ House Sparrow

This field checklist was generated using eBird (ebird.org)

# eBird



- [Home](#)
- [About](#)
- [Submit Observations](#)
- [Explore Data](#)
- [My eBird](#)
- [Help](#)

[Sign In or Register](#)

[Language](#) ▾

« Start Over

## Bird Observations

▼ **Date Range:**

Jan-Dec, 1900-2017

**India Basin Shoreline Park**

109 species (+6 other taxa)

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Brant</a>	<input type="button" value="MAP"/>			■	■			■		■	■	■	■
<a href="#">Cackling Goose</a>	<input type="button" value="MAP"/>			■	■			■		■	■	■	■
<a href="#">Canada Goose</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Northern Shoveler</a>	<input type="button" value="MAP"/>			■	■			■		■	■	■	■
<a href="#">Eurasian Wigeon</a>	<input type="button" value="MAP"/>		■	■	■			■		■	■	■	■
<a href="#">American Wigeon</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■		■	■	■	■
<a href="#">Mallard</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Greater Scaup</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■		■	■	■	■
<a href="#">Lesser Scaup</a>	<input type="button" value="MAP"/>		■	■	■			■		■	■	■	■
<a href="#">Greater/Lesser Scaup</a>	<input type="button" value="MAP"/>			■	■			■		■	■	■	■
<a href="#">Harlequin Duck</a>	<input type="button" value="MAP"/>			■	■		■	■		■	■	■	■
<a href="#">Surf Scoter</a>	<input type="button" value="MAP"/>	■	■	■	■		■	■		■	■	■	■
<a href="#">Bufflehead</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■		■	■	■	■
<a href="#">Common Goldeneye</a>	<input type="button" value="MAP"/>	■	■	■	■			■		■	■	■	■
<a href="#">Ruddy Duck</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■		■	■	■	■
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Common Loon</a>	<input type="button" value="MAP"/>			■	■		■	■		■	■	■	■
<a href="#">Pied-billed Grebe</a>	<input type="button" value="MAP"/>	■	■		■			■		■	■	■	■
<a href="#">Horned Grebe</a>	<input type="button" value="MAP"/>	■	■	■	■			■		■	■	■	■
<a href="#">Eared Grebe</a>	<input type="button" value="MAP"/>			■	■			■		■	■	■	■
<a href="#">Western Grebe</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Clark's Grebe</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Western/Clark's Grebe</a>	<input type="button" value="MAP"/>		■	■	■	■	■	■		■	■	■	■
<a href="#">Pelagic Cormorant</a>	<input type="button" value="MAP"/>				■			■		■	■	■	■
<a href="#">Double-crested Cormorant</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Brown Pelican</a>	<input type="button" value="MAP"/>	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Great Blue Heron</a>	<input type="button" value="MAP"/>			■	■			■		■	■	■	■



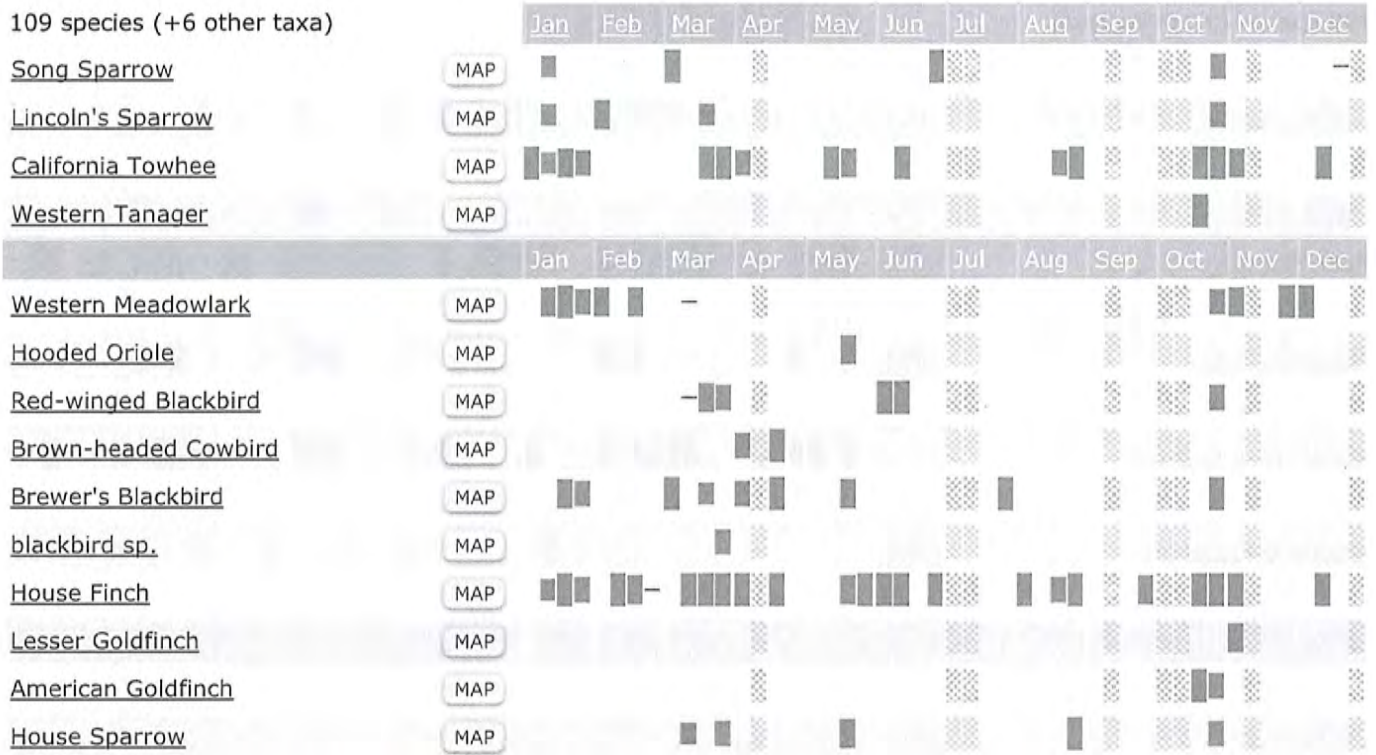
109 species (+6 other taxa)

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<u>Great Egret</u>	MAP												
<u>Snowy Egret</u>	MAP												
<u>Black-crowned Night-Heron</u>	MAP												
<u>Turkey Vulture</u>	MAP												
<hr/>													
<u>Osprey</u>	MAP												
<u>Sharp-shinned Hawk</u>	MAP												
<u>Cooper's Hawk</u>	MAP												
<u>Red-shouldered Hawk</u>	MAP												
<u>Red-tailed Hawk</u>	MAP												
<u>American Coot</u>	MAP												
<u>Black-necked Stilt</u>	MAP												
<u>American Avocet</u>	MAP												
<u>Black Oystercatcher</u>	MAP												
<u>Black-bellied Plover</u>	MAP												
<u>Semipalmated Plover</u>	MAP												
<u>Killdeer</u>	MAP												
<u>Whimbrel</u>	MAP												
<u>Long-billed Curlew</u>	MAP												
<u>Marbled Godwit</u>	MAP												
<hr/>													
<u>Dunlin</u>	MAP												
<u>Least Sandpiper</u>	MAP												
<u>Western Sandpiper</u>	MAP												
<u>peep sp.</u>	MAP												
<u>Short-billed Dowitcher</u>	MAP												
<u>Long-billed Dowitcher</u>	MAP												
<u>Short-billed/Long-billed Dowitcher</u>	MAP												
<u>Spotted Sandpiper</u>	MAP												
<u>Greater Yellowlegs</u>	MAP												
<u>Willet</u>	MAP												
<u>Mew Gull</u>	MAP												
<u>Ring-billed Gull</u>	MAP												
<u>Western Gull</u>	MAP												
<u>California Gull</u>	MAP												
<u>Herring Gull</u>	MAP												
<hr/>													
<u>Iceland Gull</u>	MAP												
<u>Glaucous-winged Gull</u>	MAP												
<u>gull sp.</u>	MAP												

109 species (+6 other taxa)

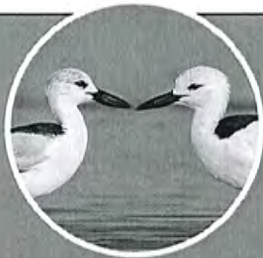


109 species (+6 other taxa)



**KEY:** ■ = insufficient data | ▽ = rare to widespread

[Download Histogram Data](#)



Connect with eBird — Subscribe to our Email Newsletter

Enter your email address...

The latest news about eBird, birding, ornithology, and conservation delivered to your inbox.

# eBird Field Checklist

## Heron's Head Park

San Francisco, California, US  
 ebird.org/ebird/hotspot/L502380

176 species (+30 other taxa) - Year-round, All Years

**Date:** \_\_\_\_\_  
**Start Time:** \_\_\_\_\_  
**Duration:** \_\_\_\_\_  
**Distance:** \_\_\_\_\_  
**Party Size:** \_\_\_\_\_  
**Notes:** \_\_\_\_\_

This checklist is generated with data from eBird (ebird.org), a global database of bird sightings from birders like you. If you enjoy this checklist, please consider contributing your sightings to eBird. It is 100% free to take part, and your observations will help support birders, researchers, and conservationists worldwide.

Go to [ebird.org](http://ebird.org) to learn more!

### Waterfowl

- \_\_\_ Snow Goose
- \_\_\_ Greater White-fronted Goose
- \_\_\_ Brant
- \_\_\_ Cackling Goose
- \_\_\_ Canada Goose
- \_\_\_ Northern Shoveler
- \_\_\_ Gadwall
- \_\_\_ Eurasian Wigeon
- \_\_\_ American Wigeon
- \_\_\_ Eurasian x American Wigeon (hybrid)
- \_\_\_ Mallard
- \_\_\_ Mallard (Domestic type)
- \_\_\_ Northern Pintail
- \_\_\_ Green-winged Teal
- \_\_\_ Canvasback
- \_\_\_ Ring-necked Duck
- \_\_\_ Greater Scaup
- \_\_\_ Lesser Scaup
- \_\_\_ Greater/Lesser Scaup
- \_\_\_ Harlequin Duck
- \_\_\_ Surf Scoter
- \_\_\_ White-winged Scoter
- \_\_\_ Black Scoter
- \_\_\_ scoter sp.
- \_\_\_ Bufflehead
- \_\_\_ Common Goldeneye
- \_\_\_ Common Merganser
- \_\_\_ Red-breasted Merganser
- \_\_\_ Ruddy Duck

\_\_\_ duck sp.

### Loons and Grebes

- \_\_\_ Red-throated Loon
- \_\_\_ Pacific Loon
- \_\_\_ Common Loon
- \_\_\_ Yellow-billed Loon
- \_\_\_ loon sp.
- \_\_\_ Pied-billed Grebe
- \_\_\_ Horned Grebe
- \_\_\_ Red-necked Grebe
- \_\_\_ Eared Grebe
- \_\_\_ Horned/Eared Grebe
- \_\_\_ Western Grebe
- \_\_\_ Clark's Grebe
- \_\_\_ Western/Clark's Grebe

### Cormorants and Anhingas

- \_\_\_ Brandt's Cormorant
- \_\_\_ Pelagic Cormorant
- \_\_\_ Double-crested Cormorant
- \_\_\_ cormorant sp.

### Pelicans

- \_\_\_ Brown Pelican

### Hérons, Ibis, and Allies

- \_\_\_ American Bittern
- \_\_\_ Great Blue Heron
- \_\_\_ Great Egret
- \_\_\_ Snowy Egret
- \_\_\_ Green Heron
- \_\_\_ Black-crowned Night-Heron

**Vultures, Hawks, and Allies**

- Turkey Vulture
- Osprey
- White-tailed Kite
- Northern Harrier
- Sharp-shinned Hawk
- Cooper's Hawk
- Sharp-shinned/Cooper's Hawk
- Red-shouldered Hawk
- Red-tailed Hawk
- Buteo sp.

**Rails, Gallinules, and Allies**

- Ridgway's Rail
- Virginia Rail
- American Coot

**Shorebirds**

- Black-necked Stilt
- American Avocet
- Black Oystercatcher
- Black-bellied Plover
- Snowy Plover
- Semipalmated Plover
- Killdeer
- Whimbrel
- Long-billed Curlew
- curlew sp.
- Marbled Godwit
- Ruddy Turnstone
- Black Turnstone
- Surfbird

- Sanderling
- Dunlin
- Baird's Sandpiper
- Least Sandpiper
- Buff-breasted Sandpiper
- Pectoral Sandpiper
- Western Sandpiper
- peep sp.
- Short-billed Dowitcher
- Long-billed Dowitcher
- Short-billed/Long-billed Dowitcher
- Wilson's Snipe
- Wilson's Phalarope
- Red-necked Phalarope
- Spotted Sandpiper
- Wandering Tattler
- Greater Yellowlegs
- Willet
- Lesser Yellowlegs
- Greater/Lesser Yellowlegs

**Alcids**

- Common Murre

**Gulls, Terns, and Skimmers**

- Bonaparte's Gull
- Heermann's Gull
- Mew Gull
- Ring-billed Gull
- Western Gull
- California Gull
- Herring Gull

- Iceland Gull
- Glaucous-winged Gull
- Western x Glaucous-winged Gull (hybrid)
- Herring x Glaucous-winged Gull (hybrid)
- Larus sp.
- gull sp.
- Least Tern
- Caspian Tern
- Black Tern
- Common Tern
- Forster's Tern
- Elegant Tern
- tern sp.
- Black Skimmer

**Pigeons and Doves**

- Rock Pigeon
- Band-tailed Pigeon
- Eurasian Collared-Dove
- Mourning Dove
- pigeon/dove sp.

**Owls**

- Barn Owl

**Swifts**

- White-throated Swift

**Hummingbirds**

- Anna's Hummingbird
- Allen's Hummingbird
- Rufous/Allen's Hummingbird
- hummingbird sp.

This field checklist was generated using eBird (ebird.org)

**Kingfishers**

\_\_\_ Belted Kingfisher

**Woodpeckers**\_\_\_ Nuttall's Woodpecker  
\_\_\_ Northern Flicker**Falcons and Caracaras**\_\_\_ American Kestrel  
\_\_\_ Merlin  
\_\_\_ Peregrine Falcon  
\_\_\_ falcon sp.**Tyrant Flycatchers: Pewees, Kingbirds, and Allies**\_\_\_ Black Phoebe  
\_\_\_ Say's Phoebe  
\_\_\_ Tropical Kingbird  
\_\_\_ Western Kingbird  
\_\_\_ Eastern Kingbird**Jays, Magpies, Crows, and Ravens**\_\_\_ Steller's Jay  
\_\_\_ California Scrub-Jay  
\_\_\_ American Crow  
\_\_\_ Common Raven  
\_\_\_ crow/raven sp.**Martins and Swallows**\_\_\_ Northern Rough-winged Swallow  
\_\_\_ Tree Swallow  
\_\_\_ Violet-green Swallow  
\_\_\_ Barn Swallow  
\_\_\_ Cliff Swallow  
\_\_\_ swallow sp.**Tits, Chickadees, and Titmice**

\_\_\_ Chestnut-backed Chickadee

**Penduline-Tits and Long-tailed Tits**

\_\_\_ Bushtit

**Wrens**

\_\_\_ Marsh Wren

**Kinglets**

\_\_\_ Ruby-crowned Kinglet

**Thrushes**\_\_\_ Hermit Thrush  
\_\_\_ American Robin**Catbirds, Mockingbirds, and Thrashers**\_\_\_ Sage Thrasher  
\_\_\_ Northern Mockingbird**Starlings and Mynas**

\_\_\_ European Starling

**Wagtails and Pipits**

\_\_\_ American Pipit

**Waxwings**

\_\_\_ Cedar Waxwing

**Wood-Warblers**\_\_\_ Orange-crowned Warbler  
\_\_\_ Common Yellowthroat  
\_\_\_ Yellow Warbler  
\_\_\_ Palm Warbler  
\_\_\_ Yellow-rumped Warbler  
\_\_\_ Townsend's Warbler  
\_\_\_ Wilson's Warbler**New World Sparrows**

\_\_\_ Nelson's Sparrow

\_\_\_ Clay-colored Sparrow

\_\_\_ Lark Sparrow

\_\_\_ Lark Bunting

\_\_\_ Fox Sparrow

\_\_\_ Dark-eyed Junco

\_\_\_ White-crowned Sparrow

\_\_\_ Golden-crowned Sparrow

\_\_\_ White-throated Sparrow

\_\_\_ Zonotrichia sp.

\_\_\_ Savannah Sparrow

\_\_\_ Song Sparrow

\_\_\_ Lincoln's Sparrow

\_\_\_ California Towhee

\_\_\_ Spotted Towhee

**Cardinals, Grosbeaks, and Allies**

\_\_\_ Western Tanager

**Blackbirds**

\_\_\_ Western Meadowlark

\_\_\_ Hooded Oriole

\_\_\_ Bullock's Oriole

\_\_\_ Red-winged Blackbird

\_\_\_ Brown-headed Cowbird

\_\_\_ Brewer's Blackbird

\_\_\_ Great-tailed Grackle

\_\_\_ blackbird sp.

**Finches, Euphonias, and Allies**

\_\_\_ House Finch

\_\_\_ Purple Finch

\_\_\_ House/Purple Finch

\_\_\_ Lesser Goldfinch

This field checklist was generated using eBird (ebird.org)

American Goldfinch

Old World Sparrows

House Sparrow

Others

passerine sp.

This field checklist was generated using eBird (ebird.org)

# eBird



- [Home](#)
- [About](#)
- [Submit Observations](#)
- [Explore Data](#)
- [My eBird](#)
- [Help](#)

[Sign In or Register](#)

[Language](#) ▾

« [Start Over](#)

## Bird Observations

▼ **Date Range:**   
 Jan-Dec, 1900-2017

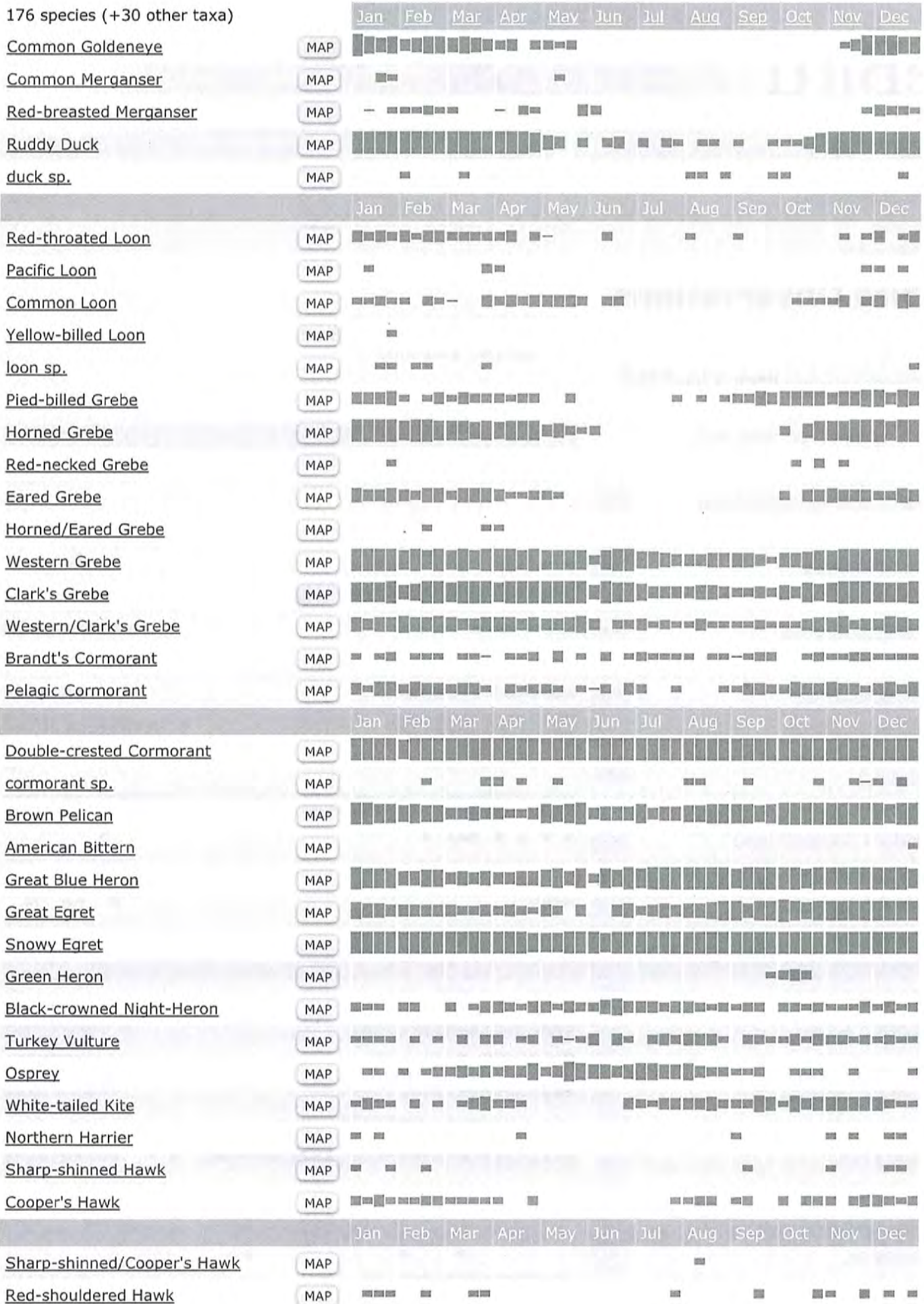
**Heron's Head Park**

176 species (+30 other taxa)

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Snow Goose</a>	<input type="button" value="MAP"/>		-										
<a href="#">Greater White-fronted Goose</a>	<input type="button" value="MAP"/>												
<a href="#">Brant</a>	<input type="button" value="MAP"/>												
<a href="#">Cackling Goose</a>	<input type="button" value="MAP"/>												
<a href="#">Canada Goose</a>	<input type="button" value="MAP"/>												
<a href="#">Northern Shoveler</a>	<input type="button" value="MAP"/>												
<a href="#">Gadwall</a>	<input type="button" value="MAP"/>												
<a href="#">Eurasian Wigeon</a>	<input type="button" value="MAP"/>												
<a href="#">American Wigeon</a>	<input type="button" value="MAP"/>												
<a href="#">Eurasian x American Wigeon (hybrid)</a>	<input type="button" value="MAP"/>												
<a href="#">Mallard</a>	<input type="button" value="MAP"/>												
<a href="#">Mallard (Domestic type)</a>	<input type="button" value="MAP"/>												
<a href="#">Northern Pintail</a>	<input type="button" value="MAP"/>												
<a href="#">Green-winged Teal</a>	<input type="button" value="MAP"/>												
<a href="#">Canvasback</a>	<input type="button" value="MAP"/>												
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Ring-necked Duck</a>	<input type="button" value="MAP"/>												
<a href="#">Greater Scaup</a>	<input type="button" value="MAP"/>												
<a href="#">Lesser Scaup</a>	<input type="button" value="MAP"/>												
<a href="#">Greater/Lesser Scaup</a>	<input type="button" value="MAP"/>												
<a href="#">Harlequin Duck</a>	<input type="button" value="MAP"/>												
<a href="#">Surf Scoter</a>	<input type="button" value="MAP"/>												
<a href="#">White-winged Scoter</a>	<input type="button" value="MAP"/>												
<a href="#">Black Scoter</a>	<input type="button" value="MAP"/>												
<a href="#">scoter sp.</a>	<input type="button" value="MAP"/>												
<a href="#">Bufflehead</a>	<input type="button" value="MAP"/>												



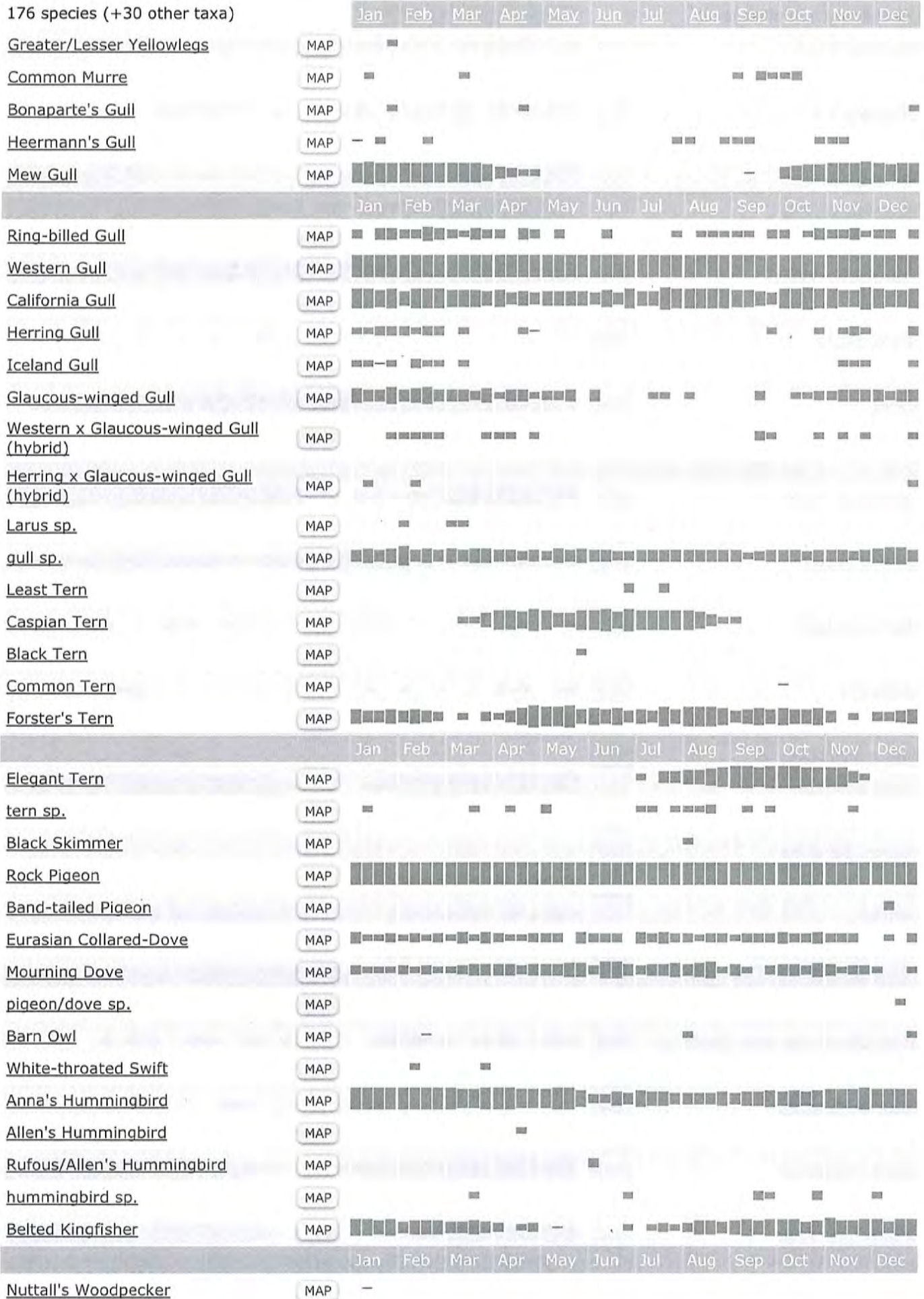
176 species (+30 other taxa)



176 species (+30 other taxa)

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Red-tailed Hawk</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Buteo sp.</a>	MAP		█	█		█					█		
<a href="#">Ridgway's Rail</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Virginia Rail</a>	MAP				█							█	
<a href="#">American Coot</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Black-necked Stilt</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">American Avocet</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Black Oystercatcher</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Black-bellied Plover</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Snowy Plover</a>	MAP							█					
<a href="#">Semipalmated Plover</a>	MAP		█	█	█	█	█	█	█	█	█	█	█
<a href="#">Killdeer</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Whimbrel</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Long-billed Curlew</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">curlew sp.</a>	MAP			█									
<a href="#">Marbled Godwit</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Ruddy Turnstone</a>	MAP	█								█			
<a href="#">Black Turnstone</a>	MAP	█	█						█	█	█	█	█
<a href="#">Surfbird</a>	MAP		█										
<a href="#">Sanderling</a>	MAP	█	█	█	█	█					█	█	█
<a href="#">Dunlin</a>	MAP	█	█	█	█	█	█				█	█	█
<a href="#">Baird's Sandpiper</a>	MAP								█	█			
<a href="#">Least Sandpiper</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Buff-breasted Sandpiper</a>	MAP								█				
<a href="#">Pectoral Sandpiper</a>	MAP									█	█		
<a href="#">Western Sandpiper</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">peep sp.</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Short-billed Dowitcher</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Long-billed Dowitcher</a>	MAP	█	█	█	█	█		█	█	█	█	█	█
<a href="#">Short-billed/Long-billed Dowitcher</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Wilson's Snipe</a>	MAP	█	█	█	█						█	█	█
<a href="#">Wilson's Phalarope</a>	MAP							█	█	█			
<a href="#">Red-necked Phalarope</a>	MAP				█	█		█	█	█	█		
<a href="#">Spotted Sandpiper</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Wandering Tattler</a>	MAP		█						█				
<a href="#">Greater Yellowlegs</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Willet</a>	MAP	█	█	█	█	█	█	█	█	█	█	█	█
<a href="#">Lesser Yellowlegs</a>	MAP	█							█	█		█	

176 species (+30 other taxa)



176 species (+30 other taxa)

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">Northern Flicker</a>	MAP	■		■	■	■						■	■
<a href="#">American Kestrel</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Merlin</a>	MAP	■	■									■	■
<a href="#">Peregrine Falcon</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">falcon sp.</a>	MAP		■	■								■	■
<a href="#">Black Phoebe</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Say's Phoebe</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Tropical Kingbird</a>	MAP			■								■	
<a href="#">Western Kingbird</a>	MAP				■	■				■			
<a href="#">Eastern Kingbird</a>	MAP								■				
<a href="#">Steller's Jay</a>	MAP		■										
<a href="#">California Scrub-Jay</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">American Crow</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Common Raven</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">crow/raven sp.</a>	MAP		■						■				
<a href="#">Northern Rough-winged Swallow</a>	MAP			■	■	■	■	■	■	■	■		
<a href="#">Tree Swallow</a>	MAP	■	■	■	■	■	■	■	■	■			
<a href="#">Violet-green Swallow</a>	MAP			■		■							
<a href="#">Barn Swallow</a>	MAP			■	■	■	■	■	■	■	■	■	■
<a href="#">Cliff Swallow</a>	MAP					■	■	■	■	■			
<a href="#">swallow sp.</a>	MAP			■	■	■	■	■	■	■	■		
<a href="#">Chestnut-backed Chickadee</a>	MAP												■
<a href="#">Bushtit</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Marsh Wren</a>	MAP	■	■			■			■			■	■
<a href="#">Ruby-crowned Kinglet</a>	MAP	■	■	■								■	■
<a href="#">Hermit Thrush</a>	MAP	■	■									■	■
<a href="#">American Robin</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Sage Thrasher</a>	MAP										■		
<a href="#">Northern Mockingbird</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<a href="#">European Starling</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">American Pipit</a>	MAP		■								■	■	■
<a href="#">Cedar Waxwing</a>	MAP			■	■	■						■	■
<a href="#">Orange-crowned Warbler</a>	MAP	■	■	■							■	■	■
<a href="#">Common Yellowthroat</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Yellow Warbler</a>	MAP									■	■		
<a href="#">Palm Warbler</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Yellow-rumped Warbler</a>	MAP	■	■	■	■	■	■	■	■	■	■	■	■
<a href="#">Townsend's Warbler</a>	MAP	■											

176 species (+30 other taxa)

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

- [Wilson's Warbler](#) MAP
- [Nelson's Sparrow](#) MAP
- [Clay-colored Sparrow](#) MAP
- [Lark Sparrow](#) MAP
- [Lark Bunting](#) MAP
- [Fox Sparrow](#) MAP

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

- [Dark-eyed Junco](#) MAP
- [White-crowned Sparrow](#) MAP
- [Golden-crowned Sparrow](#) MAP
- [White-throated Sparrow](#) MAP
- [Zonotrichia sp.](#) MAP
- [Savannah Sparrow](#) MAP
- [Song Sparrow](#) MAP
- [Lincoln's Sparrow](#) MAP
- [California Towhee](#) MAP
- [Spotted Towhee](#) MAP
- [Western Tanager](#) MAP
- [Western Meadowlark](#) MAP
- [Hooded Oriole](#) MAP
- [Bullock's Oriole](#) MAP
- [Red-winged Blackbird](#) MAP

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

- [Brown-headed Cowbird](#) MAP
- [Brewer's Blackbird](#) MAP
- [Great-tailed Grackle](#) MAP
- [blackbird sp.](#) MAP
- [House Finch](#) MAP
- [Purple Finch](#) MAP
- [House/Purple Finch](#) MAP
- [Lesser Goldfinch](#) MAP
- [American Goldfinch](#) MAP
- [House Sparrow](#) MAP
- [passerine sp.](#) MAP

**KEY:** | = insufficient data | = rare to widespread

[Download Histogram Data](#)



Connect with eBird — Subscribe to our Email Newsletter

Enter your email address...

Subscribe



The latest news about eBird, birding, ornithology, and conservation delivered to your inbox.

© [Cornell Lab of Ornithology](#) | [Contact](#) | [FAQ](#)

< Hotspot Map

# Heron's Head Park

San Francisco County, California, US — [Get Directions](#)

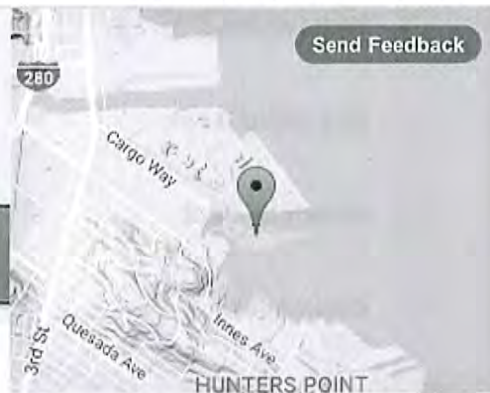
All Months ▾

All Years ▾

Set

Submit Data

Send Feedback



Overview

Recent Visits

Illustrated Checklist

# 176 Species | 2024 Checklists

Updated 11 sec ago.

Last Seen

First Seen

High Counts

Bar

Show All Details

Charts

Printable Checklist

## Recent Visits

Checklists submitted within the last hour are not shown.

OBSERVER	DATE	SPECIES
Preston Duncan	24 Oct 2017	47
Kevin Liberg	23 Oct 2017	43
Anonymous eBirder	22 Oct 2017	6
Bob Dunn	22 Oct 2017	29
Noreen Weeden	22 Oct 2017	38
Eddie Bartley	22 Oct 2017	38
Eddie Bartley	22 Oct 2017	44
Anonymous eBirder	21 Oct 2017	42
Aaron Maizlish	20 Oct 2017	35
Noreen Weeden	18 Oct 2017	19

More Recent Visits...

## Top eBirders

BY SPECIES | BY CHECKLISTS Updated 11 sec ago.

1	Dominik Mosur	118
2	Richard	115




	SPECIES NAME ▾	COUNT ▾	DATE ▾	BY
1	<b>Mallard</b>	14	24 Oct 2017	Preston Duncan
2	<b>Northern Pintail</b>	2	24 Oct 2017	Preston Duncan
3	<b>Pied-billed Grebe</b>	1	24 Oct 2017	Preston Duncan
4	<b>Horned Grebe</b>	1	24 Oct 2017	Preston Duncan
5	<b>Brandt's Cormorant</b>	1	24 Oct 2017	Preston Duncan
6	<b>Pelagic Cormorant</b>	3	24 Oct 2017	Preston Duncan
7	<b>Double-crested Cormorant</b>	9	24 Oct 2017	Preston Duncan
8	<b>Brown Pelican</b>	5	24 Oct 2017	Preston Duncan
9	<b>Great Blue Heron</b>	1	24 Oct 2017	Preston Duncan
10	<b>Great Egret</b>	2	24 Oct 2017	Preston Duncan
11	<b>Snowy Egret</b>	3	24 Oct 2017	Preston Duncan
12	<b>Turkey Vulture</b>	1	24 Oct 2017	Preston Duncan

	SPECIES NAME	COUNT	DATE	BY	Drechsler
13	White-tailed Kite	1	24 Oct 2017	Preston Duncan	3 David Assmann 111
14	Red-tailed Hawk	1	24 Oct 2017	Preston Duncan	4 Bob Dunn 110
15	American Coot	5	24 Oct 2017	Preston Duncan	5 Eddie Bartley 107
16	Black-necked Stilt	6	24 Oct 2017	Preston Duncan	6 Linda Swanson 103
17	Black Oystercatcher	1	24 Oct 2017	Preston Duncan	7 Kevin Liberg 98
18	Black-bellied Plover	20	24 Oct 2017	Preston Duncan	7 logan kahle 98
19	Killdeer	4	24 Oct 2017	Preston Duncan	9 Rob Cullison 93
20	Whimbrel	3	24 Oct 2017	Preston Duncan	9 Scott Bowers 93
21	Long-billed Curlew	1	24 Oct 2017	Preston Duncan	
22	Marbled Godwit	7	24 Oct 2017	Preston Duncan	
23	Least Sandpiper	25	24 Oct 2017	Preston Duncan	
24	Wilson's Snipe	3	24 Oct 2017	Preston Duncan	
25	Spotted Sandpiper	2	24 Oct 2017	Preston Duncan	
26	Willet	15	24 Oct 2017	Preston Duncan	
27	Western Gull	150	24 Oct 2017	Preston Duncan	
28	California Gull	15	24 Oct 2017	Preston Duncan	
29	Forster's Tern	2	24 Oct 2017	Preston Duncan	
30	Elegant Tern	2	24 Oct 2017	Preston Duncan	
31	Rock Pigeon	50	24 Oct 2017	Preston Duncan	









	SPECIES NAME ▾	COUNT ▾	DATE ▾	BY
32	<b>Eurasian Collared-Dove</b>	4	24 Oct 2017	Preston Duncan
33	<b>Anna's Hummingbird</b>	2	24 Oct 2017	Preston Duncan
34	<b>Belted Kingfisher</b>	1	24 Oct 2017	Preston Duncan
35	<b>American Kestrel</b>	1	24 Oct 2017	Preston Duncan
36	<b>Black Phoebe</b>	3	24 Oct 2017	Preston Duncan
37	<b>Say's Phoebe</b>	1	24 Oct 2017	Preston Duncan
38	<b>American Crow</b>	3	24 Oct 2017	Preston Duncan
39	<b>Common Raven</b>	1	24 Oct 2017	Preston Duncan
40	<b>Common Yellowthroat</b>	1	24 Oct 2017	Preston Duncan
41	<b>Yellow-rumped Warbler</b>	3	24 Oct 2017	Preston Duncan
42	<b>White-crowned Sparrow</b>	14	24 Oct 2017	Preston Duncan
43	<b>Savannah Sparrow</b>	9	24 Oct 2017	Preston Duncan
44	<b>Western Meadowlark</b>	6	24 Oct 2017	Preston Duncan
45	<b>House Finch</b>	9	24 Oct 2017	Preston Duncan
46	<b>Lesser Goldfinch</b>	1	24 Oct 2017	Preston Duncan
47	<b>Canada Goose</b>	3	23 Oct 2017	Kevin Liberg
48	<b>Greater Yellowlegs</b>	2	23 Oct 2017	Kevin Liberg
49	<b>California Scrub-Jay</b>	1	23 Oct 2017	Kevin Liberg
50	<b>Bushtit</b>	18	23 Oct 2017	Kevin Liberg












	SPECIES NAME	COUNT	DATE	BY
51	<b>Northern Mockingbird</b>	1	23 Oct 2017	Kevin Liberg
52	<b>European Starling</b>	8	23 Oct 2017	Kevin Liberg
53	<b>Golden-crowned Sparrow</b>	1	23 Oct 2017	Kevin Liberg
54	<b>Song Sparrow</b>	1	23 Oct 2017	Kevin Liberg
55	<b>Brewer's Blackbird</b>	1	23 Oct 2017	Kevin Liberg
56	<b>American Wigeon</b>	1	22 Oct 2017	Anonymous eBirder
57	<b>American Avocet</b>	3	22 Oct 2017	Bob Dunn
58	<b>Northern Shoveler</b>	1	22 Oct 2017	Noreen Weeden
59	<b>Western Sandpiper</b>	1	22 Oct 2017	Noreen Weeden
60	<b>Fox Sparrow</b>	1	22 Oct 2017	Noreen Weeden
61	<b>Hermit Thrush</b>	1	22 Oct 2017	Eddie Bartley
62	<b>California Towhee</b>	1	22 Oct 2017	Eddie Bartley
63	<b>Ruddy Duck</b>	31	21 Oct 2017	Anonymous eBirder
64	<b>Mew Gull</b>	4	21 Oct 2017	Anonymous eBirder
65	<b>Green-winged Teal</b>	4	20 Oct 2017	Aaron Maizlish
66	<b>Ring-billed Gull</b>	10	20 Oct 2017	Aaron Maizlish
67	<b>Orange-crowned Warbler</b>	1	20 Oct 2017	Aaron Maizlish
68	<b>Surf Scoter</b>	10	18 Oct 2017	Noreen Weeden
69	<b>Eared Grebe</b>	1	18 Oct 2017	Kevin Liberg









	SPECIES NAME ▾	COUNT ▾	DATE ▾	BY	
70	<b>Green Heron</b>	1	18 Oct 2017	Kevin Liberg	
71	<b>Mourning Dove</b>	1	15 Oct 2017	Shantanu Phukan	
72	<b>Peregrine Falcon</b>	1	15 Oct 2017	Shantanu Phukan	
73	<b>Sage Thrasher</b>	1	13 Oct 2017	Kevin Liberg	
74	<b>American Goldfinch</b>	2	13 Oct 2017	Kevin Liberg	
75	<b>Sanderling</b>	4	8 Oct 2017	Scott Krumsee	
76	<b>House Sparrow</b>	2	8 Oct 2017	Eddie Bartley	
	gull sp.	250	7 Oct 2017	David Assmann	
77	<b>Black-crowned Night-Heron</b>	1	4 Oct 2017	Kevin Liberg	
78	<b>Black Turnstone</b>	2	15 Sep 2017	Bob Dunn	
79	<b>Western Grebe</b>	1	6 Sep 2017	Kevin Liberg	
80	<b>Barn Swallow</b>	6	6 Sep 2017	Kevin Liberg	
81	<b>Osprey</b>	2	3 Sep 2017	Scott Bowers	
	Short-billed/Long-billed Dowitcher	1	31 Aug 2017	Noreen Weeden	
	duck sp.	3	29 Aug 2017	Brian Turner	 
	peep sp.	20	19 Aug 2017	Nina Bai	
82	<b>Red-necked Phalarope</b>	1	12 Aug 2017	Eddie Monson	
83	<b>Cooper's Hawk</b>	1	11 Aug 2017	Sam S	
	Sharp-shinned/Cooper's Hawk	1	11 Aug 2017	Sam S	
84	<b>Caspian Tern</b>	1	11 Aug 2017	Sam S	
	crow/raven sp.	2	11 Aug 2017	Sam S	

	SPECIES NAME	COUNT	DATE	BY	
85	<b>Brown-headed Cowbird</b>	1	5 Aug 2017	Kevin Liberg	
86	<b>Marsh Wren</b>	1	4 Aug 2017	Colin Meusel	
	passerine sp.	1	1 Aug 2017	Dominik Mosur	
	tern sp.	2	27 Jul 2017	Kevin Liberg	
87	<b>Least Tern</b>	4	18 Jul 2017	Patricia Bacchetti	 
88	<b>Snowy Plover</b>	3	18 Jul 2017	Charlene Glacy	
89	<b>American Robin</b>	1	3 Jul 2017	David Assmann	
90	<b>Red-winged Blackbird</b>	23	18 Jun 2017	Nicholas Farago	
91	<b>Common Loon</b>	1	18 Jun 2017	Kevin Liberg	
92	<b>Greater Scaup</b>	9	6 May 2017	Anonymous eBirder	
93	<b>Clark's Grebe</b>	3	6 May 2017	Anonymous eBirder	
94	<b>Semipalmated Plover</b>	2	6 May 2017	Anonymous eBirder	
95	<b>Lesser Scaup</b>	1	29 Apr 2017	Scott Bowers	
96	<b>Northern Rough-winged Swallow</b>	1	29 Apr 2017	Scott Bowers	
97	<b>Cedar Waxwing</b>	15	29 Apr 2017	Scott Bowers	
98	<b>Short-billed Dowitcher</b>	6	22 Apr 2017	Max Lara	
99	<b>Bufflehead</b>	3	21 Apr 2017	David Assmann	
100	<b>Dunlin</b>	1	21 Apr 2017	David Assmann	
101	<b>Gadwall</b>	2	15 Apr 2017	Stanley Greenberg	

	SPECIES NAME ▾	COUNT ▾	DATE ▾	BY	
	cormorant sp.	2	15 Apr 2017	Stanley Greenberg	
102	<b>Allen's Hummingbird</b>	1	15 Apr 2017	Stanley Greenberg	
	Greater/Lesser Scaup	X	13 Apr 2017	Russ Bright	
	Western/Clark's Grebe	10	13 Apr 2017	Russ Bright	
	Horned/Eared Grebe	1	3 Apr 2017	Kimberly Jannarone	
103	<b>Lincoln's Sparrow</b>	1	22 Mar 2017	David Assmann	
104	<b>Iceland Gull</b>	1	10 Mar 2017	Linda Swanson	
105	<b>Glaucous-winged Gull</b>	1	10 Mar 2017	Linda Swanson	
	Larus sp.	X	9 Mar 2017	Russ Bright	
106	<b>Common Goldeneye</b>	1	24 Feb 2017	Linda Swanson	
	Western x Glaucous-winged Gull (hybrid)	1	23 Feb 2017	Karen Vandergrift	
107	<b>Ring-necked Duck</b>	2	19 Feb 2017	Christine Okon	
108	<b>Herring Gull</b>	1	19 Feb 2017	Daniel George	
109	<b>Sharp-shinned Hawk</b>	1	19 Feb 2017	Margaret Weis	
110	<b>Red-throated Loon</b>	1	16 Feb 2017	David Assmann	
111	<b>Red-shouldered Hawk</b>	1	29 Jan 2017	Laurie Graham	
112	<b>Red-necked Grebe</b>	1	27 Jan 2017	Rob Cullison	 
113	<b>Eurasian Wigeon</b>	1	14 Jan 2017	Peter Colasanti	

	SPECIES NAME	COUNT	DATE	BY	
114	<b>Townsend's Warbler</b>	1	5 Jan 2017	Rob Cullison	
115	<b>Northern Flicker</b>	1	25 Dec 2016	Juli Chamberlin	
	Herring x Glaucous-winged Gull (hybrid)	1	23 Dec 2016	Liam Waters	
	Zonotrichia sp.	6	23 Dec 2016	Liam Waters	
116	<b>Canvasback</b>	2	20 Dec 2016	Liam Waters	
117	<b>Ruby-crowned Kinglet</b>	1	17 Dec 2016	Felix Rigau	
	pigeon/dove sp.	1	17 Dec 2016	Linda Swanson	
118	<b>Virginia Rail</b>	1	23 Nov 2016	Lee-Hong Chang	
119	<b>Cackling Goose</b>	1	17 Nov 2016	Russ Bright	 
120	<b>Black Scoter</b>	1	6 Nov 2016	Philip Eager	
121	<b>Western Tanager</b>	1	26 Sep 2016	Kevin Liberg	
122	<b>Long-billed Dowitcher</b>	1	18 Sep 2016	Cyndi Bakir	
123	<b>Common Murre</b>	1	5 Sep 2016	Jordan Carelli	
	swallow sp.	1	27 Aug 2016	Sarah Barsness	
124	<b>Bullock's Oriole</b>	1	20 Jul 2016	Kevin Liberg	
	blackbird sp.	2	19 Jul 2016	Holly Bern	
125	<b>Tree Swallow</b>	2	11 Jul 2016	Kevin Liberg	
126	<b>Hooded Oriole</b>	4	26 Jun 2016	Carol Finucane	
127	<b>Cliff Swallow</b>	4	5 Jun 2016	Philip Eager	
128	<b>Western Kingbird</b>	1	8 May 2016	Bob Dunn	

	SPECIES NAME ▾	COUNT ▾	DATE ▾	BY	
129	<b>Common Merganser</b>	1	8 May 2016	Jordan Carelli	 
130	<b>Violet-green Swallow</b>	1	1 May 2016	Dominik Mosur	
131	<b>Red-breasted Merganser</b>	1	24 Apr 2016	Jordan Carelli	
132	<b>Pacific Loon</b>	1	23 Mar 2016	Bonnie Bompert	
	hummingbird sp.	1	20 Mar 2016	Nan Foster	
133	<b>Surfbird</b>	1	27 Feb 2016	Amy Williamson	
134	<b>Palm Warbler</b>	1	1 Feb 2016	Judi Hwa	 
	loon sp.	2	24 Jan 2016	Ken Schneider	
135	<b>Bonaparte's Gull</b>	3	24 Jan 2016	Oscar Moss	
136	<b>American Pipit</b>	1	24 Jan 2016	Michael Park	
137	<b>Yellow-billed Loon</b>	1	24 Jan 2016	Bob Gunderson	 
138	<b>Merlin</b>	1	17 Jan 2016	Robert Martin	
139	<b>Chestnut-backed Chickadee</b>	1	29 Dec 2015	Kevin Liberg	
	falcon sp.	1	25 Nov 2015	Michael Gertz	
140	<b>Lark Sparrow</b>	1	25 Nov 2015	Michael Gertz	
141	<b>Heermann's Gull</b>	1	24 Oct 2015	Bob Dunn	
142	<b>Clay-colored Sparrow</b>	1	4 Oct 2015	Graham Chisholm	
	House/Purple Finch	4	7 Sep 2015	Jordan Carelli	
	scoter sp.	1	18 Apr 2015	Steve Tucker	

	SPECIES NAME	COUNT	DATE	BY	
143	<b>Northern Harrier</b>	1	16 Apr 2015	Sarah Barsness	
144	<b>Purple Finch</b>	1	30 Mar 2015	Anna Sojourner	
	Eurasian x American Wigeon (hybrid)	1	20 Mar 2015	Lee-Hong Chang	
145	<b>Dark-eyed Junco</b>	X	18 Mar 2015	Bob Gunderson	
	curlew sp.	1	15 Mar 2015	CAROLY NESPEY	 
	Mallard (Domestic type)	X	7 Mar 2015	Bob Gunderson	
146	<b>Brant</b>	1	28 Feb 2015	Bob Dunn	
147	<b>Spotted Towhee</b>	1	28 Feb 2015	Warren Thorpe	
148	<b>Steller's Jay</b>	1	21 Feb 2015	Megan Prelinger	
	Buteo sp.	1	7 Feb 2015	Michael Gertz	
149	<b>American Bittern</b>	1	30 Dec 2014	Dominik Mosur	
150	<b>Band-tailed Pigeon</b>	3	13 Dec 2014	Kimberly Jannarone	
151	<b>Ridgway's Rail</b>	1	13 Oct 2014	David Assmann	
152	<b>Yellow Warbler</b>	1	18 Sep 2014	Anonymous eBirder	
153	<b>Black Skimmer</b>	1	2 Aug 2014	Dominik Mosur	
154	<b>Harlequin Duck</b>	1	22 May 2014	Linda Swanson	
155	<b>Wilson's Warbler</b>	1	27 Apr 2014	William Rockey	
156	<b>Wandering Tattler</b>	1	7 Mar 2014	Zack Stender	
157	<b>Barn Owl</b>	1	17 Feb 2014	Scott Bowers	



	SPECIES NAME ▾	COUNT ▾	DATE ▾	BY	
	Greater/Lesser Yellowlegs	1	26 Jan 2014	Amanda Starbuck	
158	<b>Great-tailed Grackle</b>	X	20 Jan 2014	Bob Gunderson	
159	<b>Greater White-fronted Goose</b>	1	13 Jan 2014	Anonymous eBirder	
160	<b>Wilson's Phalarope</b>	2	8 Aug 2013	Richard Drechsler	
	Rufous/Allen's Hummingbird	1	1 Jun 2013	Everett Clark	
161	<b>Black Tern</b>	1	26 May 2013	David Assmann	
162	<b>White-winged Scoter</b>	1	20 Apr 2013	Alex Merritt	 
163	<b>White-throated Sparrow</b>	X	31 Mar 2013	Bob Gunderson	
164	<b>White-throated Swift</b>	1	23 Mar 2013	Jennifer Daggy	
165	<b>Tropical Kingbird</b>	1	18 Mar 2013	Zack Stender	
166	<b>Lesser Yellowlegs</b>	1	25 Nov 2012	Robbie Fischer	
167	<b>Ruddy Turnstone</b>	1	9 Sep 2012	Dan Murphy	
168	<b>Lark Bunting</b>	1	8 Sep 2012	Zack Stender	
169	<b>Pectoral Sandpiper</b>	3	9 Sep 2011	Dominik Mosur	
170	<b>Baird's Sandpiper</b>	1	6 Aug 2011	Dominik Mosur	
171	<b>Snow Goose</b>	1	23 Jan 2011	Bob Dunn	
172	<b>Nuttall's Woodpecker</b>	1	9 Jan 2011	Linda Swanson	
173	<b>Nelson's Sparrow</b>	1	15 Nov 2009	San Francisco County Historical Records	 

	SPECIES NAME ▾	COUNT ▾	DATE ▾	BY	
174	<b>Eastern Kingbird</b>	1	15 Aug 2008	Dominik Mosur	
175	<b>Buff-breasted Sandpiper</b>	1	28 Aug 2007	Stephanie Floyd	
176	<b>Common Tern</b>	1	3 Oct 2005	San Francisco County Historical Records	 



October 30, 2017

Michael Li  
San Francisco Planning Department  
1650 Mission Street Suite 400  
San Francisco, CA 94103  
*Submitted via email to michael.j.li@sfgov.org*

**Greenaction for Health and Environmental Justice Comments on DEIR for Proposed India Basin Mixed Use Project**

On behalf of our members and constituents in Bayview Hunters Point, San Francisco, we submit the following comments on the Draft Environmental Impact Report for the proposed India Basin Mixed Use Project. Greenaction For Health and Environmental Justice is a multiracial grassroots organization that works with low-income and working class urban, rural, and indigenous communities to fight environmental racism and build a clean, healthy and just future for all. Greenaction has been involved in environmental health and justice advocacy in Bayview Hunters Point since we were founded in 1997. This low-income community of color continues to be negatively and disproportionately impacted by pollution, gentrification, health disparities, and other forms of environmental, social, economic injustice.

**I. San Francisco Planning Department’s Denial of Language Access and Violation of Civil Rights of Limited and Non-English Speaking Residents:**

The San Francisco Planning Department’s refusal to translate the Scoping Notice for this proposed project and failure to provide even executive summaries of key project documents has denied residents who are limited or non-English speaking from meaningful civic engagement in this environmental review process. As the City and County of San Francisco are recipients of state and federal funding, it must comply with state and federal civil rights laws (California Government Code 11135 and Title VI of the United States Civil Rights Act). These civil rights laws explicitly prohibit recipients of state and/or federal funding from taking actions that have a disparate, discriminatory impact on people of color and non-English speaking people.

The first civil rights violation occurred when the Planning Department failed to translate the Scoping Notice and refused to remedy that failure. Thus, the ongoing failure to provide language

O-  
GA2-1  
(GC-1)

access, and the subsequent refusal to remedy the problem, constitutes a violation of state and federal civil rights laws. No permit can be issued based on a process that clearly violated the civil rights of residents potentially impacted by the proposed project.

In addition, the Planning Department’s translation of the “Notice of Public Hearing and Availability of A Draft Environmental Impact Report” in no ways complies with language access requirements as the limited and non-English speaking residents who may see that Notice in a language they understand would still not be able to read a single word of the DEIR document.

We attach documentation of the civil rights and language access violations, and incorporate those documents into our comments.

O-  
GA2-1  
cont'd  
(GC-1)

**II. Greenaction does not oppose the Recreation and Parks Department component of the project, except all toxic contamination must be remediated and the project must not contribute to gentrification:**

The people of Bayview Hunters Point deserve more open space and parks, but the open space and parks must be safe and free of toxic contamination.

The San Francisco Recreation and Parks Department has been responsive to input and concerns about toxic contamination at the site, and it appears they are addressing the contamination issue.

However, we remain concerned with the plans in the RPD component of the project that would result in increased subsistence fishing and consumption by low-income people and their families and friends of toxic-contaminated fish from the Bay. This concern can be partially remedied by the placing of multilingual fish advisory signs along the waterfront, and a Healthy Subsistence Fishing community education project such as the pilot project currently being conducted by Greenaction in partnership with RPD.

O-  
GA2-2  
(HZ-1)

In addition, plans to promote kayaking at the site will directly contribute to the gentrification threatening to displace long time people of color residents from their community.

O-  
GA2-3  
(PH-1)

**III. Greenaction agrees with the conclusion reached by the Planning Department’s Draft EIR which “finds that implementation of the proposed project would lead to significant unavoidable project-level or cumulative impacts related to cultural resources, transportation and circulation, noise, air quality, and wind.”**

However, the DEIR underestimated a number of other key significant aspects of the proposed project that would also have significant unavoidable and negative impacts on the environment, community and public health.

O-  
GA2-4  
(GC-5)

Therefore, due to the significant unavoidable negative impacts, the Planning Department must deny permits for the proposed project.

**IV. Planning Department Must Not Use a Statement of Overriding Consideration to Approve this Project Despite Significant Unavoidable Negative Impacts:**

It would be completely improper, and a violation of civil rights of people of color residents of Bayview Hunters Point, if the Planning Department decides to circumvent EIR findings of significant unavoidable impacts by using a Statement of Overriding Consideration exemption under CEQA.

Use of a Statement of Overriding Consideration to approve an upscale mega-development project that would contribute to pollution and gentrification of the already polluted, heavily impacted people of color community would be a major violation of civil rights and would be challenged successfully.

O-  
GA2-4  
cont'd  
(GC-5)

**V. Population and Housing: Section 3.3**

The DEIR’s conclusion in Section 3.3 that “The proposed project or variant would not induce substantial population growth in an area...” and thus have a “Less than significant” impact is contradicted by the facts of the project proposal. The project proposes to build either 1240 dwelling units or 500 – which clearly would involve thousands of new residents in the area.

The conclusion that “The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not substantially contribute to cumulative impacts related to population and housing” is also factually incorrect. The BUILD LLC project at India Basin, combined with the even larger Lennar/Five Points SF Shipyard project, would result in many thousands of new dwelling units and tens of thousands of new residents. In addition, as these projects are targeting a higher income level than that of most Bayview Hunters Point residents, these projects will have a major, significant and unavoidable negative impact including gentrification and the ultimate displacement of long time people of color and low income residents of the community.

These impacts are significant, negative, and unavoidable if the project is approved.

O-  
GA2-5  
(PH-4)

**VI. Cultural Resources: Section 3.4**

Greenaction agrees with the DEIR’s conclusion that “Construction under the proposed project or variant would disturb human remains, including those interred outside of formal cemeteries.”

This area of Bayview Hunters Point is known to have been occupied the Ohlone people. Any project that would disturb, remove or desecrate human remains of the original inhabitants of this

O-  
GA2-6  
(CR-3)

land is unacceptable. These remains should be respected and not be removed from their resting place. This would be a significant negative impact that is unavoidable and cannot be mitigated.

O-  
GA2-6  
cont'd  
(CR-3)

**VII. Transportation and Circulation: Section 3.5**

The DEIR’s conclusion in Section 3.5 that “The proposed project or variant would not cause substantial additional VMT or substantially induce automobile travel” and that the impact would be “Less than significant” is clearly incorrect. The impact will be significant and unavoidable as the India Basin project would bring thousands of people to the residential and commercial developments on a daily basis – and a large number of these individuals will travel by automobile. No amount of traffic control, shuttles, or even public transportation improvements will be able to reduce this impact to less than significant.

O-  
GA2-7  
(TR-2)

**VIII. Noise: Section 3.6**

We agree that many of the noise impacts would be significant and unavoidable.

O-  
GA2-8  
(NO-1)

**IX. Air Quality: Section 3.7**

We agree with the DEIR's assessment that this project will have significant and cumulative negative health impacts on air quality that cannot be mitigated and are unavoidable. Moreover, these impacts will exacerbate health impacts in an already heavy polluted and highly vulnerable low income community of color. In light of these facts, the proposed project cannot and must not be approved.

The CEQA analysis should include environmental, health, air quality and cumulative impact information from the California Environmental Protection Agency and the Bay Area Air Quality Management District (BAAQMD) – both of whom have documented that Bayview Hunters Point is a community highly at risk from pollution.

O-  
GA2-9  
(AQ-1)

In 2004 BAAQMD initiated the Community Air Risk Evaluation (CARE) program to identify areas with high concentrations of air pollution and populations most vulnerable to air pollution’s health impacts. The Bayview Hunters Point community was designated by BAAQMD as a CARE community. In Bayview Hunters Point, the intersection of ports, railways, municipal vehicle yards, concrete batch plants, freeways, and a large waste water treatment facility has contributed to high rates of air pollution and asthma hospitalizations. According to the Bay Area Air Quality Management District (BAAQMD), despite tremendous strides in air pollution reduction, communities such as Bayview Hunters Point, experience higher pollution levels, and more adverse health effects, compared to their counterparts in other parts of the region ([http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE\\_Retrospective\\_April2014.ashx](http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CARE%20Program/Documents/CARE_Retrospective_April2014.ashx)). Additionally, according to a report by the Bay Area Regional Health Inequities Initiative (a collaboration of senior officials, managers and staff from eight health departments in the Bay Area), where a person lives helps determine his or her



health outcomes: Bayview/Hunters Point residents are expected to live 14 years less than those living in Russian Hill ([http://barhii.org/wp-content/uploads/2015/09/barhii\\_hiba.pdf](http://barhii.org/wp-content/uploads/2015/09/barhii_hiba.pdf)).

CalEnviroScreen 3.0 is a screening tool that ranks California communities based on potential exposures to pollutants, adverse environmental conditions, socioeconomic factors and prevalence of certain health conditions. CalEnviroScreen 3.0 ranks Bayview Hunters Point in the 90<sup>th</sup> percentile. This percentile means that Bayview Hunters Point has a higher pollution burden and pollution vulnerability than 90% of California (CalEnviroScreen 3.0 Data Map, <https://arcg.is/qim5X>).

More specifically, CalEnviroScreen ranks Bayview Hunters Point in the 99<sup>th</sup> percentile for diesel particulate, 98<sup>th</sup> percentile for groundwater threats, 98<sup>th</sup> percentile for asthma, 99<sup>th</sup> percentile for low birth weight, and 86<sup>th</sup> percentile for hazardous waste. The community's vulnerability to pollution is amplified by socioeconomic factors such as poverty, unemployment, and housing affordability. CalEnviroScreen ranks Bayview Hunters Point in the 87<sup>th</sup> percentile for poverty, 84<sup>th</sup> percentile in unemployment, and 91<sup>st</sup> percentile in housing affordability (residents of low-income households with high housing costs may suffer adverse health impacts).

O-  
GA2-9  
cont'd  
(AQ-1)

#### **X. Greenhouse Gas Emissions: Section 3.8**

The DEIR incorrectly concludes in Section 3.8 that “The proposed project or variant would generate greenhouse gas emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions.”

Greenhouse gas emissions from construction and the vehicular and truck traffic associated with constructed and using the proposed project residential and commercial components would add to the unacceptable level of air pollution impacting Bayview Hunters Point and its residents. Any increase of emissions into the air of this community which both the Bay Area Air Quality Management District's CARE program and the California EPA's CalEnviroScreen will further threaten the health of residents already at risk and highly vulnerable.

O-  
GA2-10  
(GG-1)

#### **XI. Utilities and Service Systems: Section 3.12**

The DEIR failed to consider that the addition of thousands of new residents and workers whose homes and workplaces would add to the Southeast wastewater treatment facility's load. The sewage treatment plant in Bayview Hunters Point already handles most of the City's sewage as well as other that from other locations, and adding to this burden would have a significant unavoidable impact.

O-  
GA2-11  
(UT-1)

#### **XII. Public Services: Section 3.13**

O-  
GA2-12  
(PS-1)

The DEIR’s conclusion that the proposed project or variants would not increase demand for fire, police, library, school services is incorrect. Clearly, the addition of thousands of new residents and office/commercial workers in hundreds of new dwelling and commercial units would have a significant impact on limited city services.

O-  
GA2-12  
cont'd  
(PS-1)

**XIII. Hazards and Hazardous Materials: Section 3.16 – and Toxic and Potentially Radioactive Contamination at the Site:**

Due to the close proximity of the proposed project to the radioactive contaminated Hunters Point Naval Shipyard Superfund site, and in light of information provided by community elders and whistleblowers regarding testing, handling and disposal of radioactive wastes at the Shipyard, this project must include a thorough testing, analysis and summary of potentially radioactive and toxic contaminants before any use of this site. While Recreation and Parks has done testing for toxic contaminants and is planning extensive remediation, we are not aware of test results from the BUILD LLC project component. This information is also vitally important to include in the CEQA/EIR process in light of the certainty of rising sea levels and potential storm surges.

O-  
GA2-13  
(HZ-2)

**XIV. Impact of Sea Level Rise:**

The DEIR fails to discuss or evaluate the impact sea level rise will have on the proposed project, including homes, businesses, infrastructure, and the hazardous waste contamination that may be left at the site.

The DEIR states “The project site is subject to flooding from sea-level rise, but the proposed project or variant would not exacerbate the frequency or severity of flooding or cause flooding in areas otherwise would not be subject to flooding without the project.” This proposed project may or may not “exacerbate the frequency or severity flooding,” but will be impacted by rising sea levels and storm surges associated with climate change.

O-  
GA2-14  
(HY-1)

The San Francisco Bay Conservation and Development Commission and the San Francisco Department of the Environment are predicting a sea level rise of 11 to 19 inches by 2050 and 30 to 55 inches by 2100. An increase of sea level will cause coastal flooding, storm surges, coastal erosion/shoreline retreat, rising groundwater and wetland loss. Communities living near San Francisco Bay, such as Bayview Hunters Point, are extremely vulnerable to flooding from sea level rise – and this includes the proposed India Basin project site.

Submitted,

Sincerely,

Bradley Angel, Executive Director  
Sheridan Noelani Enomoto, Community Organizer and Policy Advocate



## Li, Michael (CPC)

---

**From:** Bollinger, Brett (CPC) <brett.bollinger@sfgov.org>  
**Sent:** Thursday, June 09, 2016 7:52 AM  
**To:** Bradley Angel  
**Cc:** Marie Harrison; etecia@greenaction.org  
**Subject:** RE: Request to extend public comment period on scoping for Indian Basin Mixed-Use Project, and request for the Planning Dept. to provide short presentation at June 15th BVHP EJ Task Force meeting

Thank you for your interest in the project. To be clear about the project notice that was sent out on 6/1/2016 and the overall environmental review process, this was a Notice of Preparation (NOP) of an Environmental Impact Report under the California Environmental Quality Act (CEQA). Although an Initial Study (IS) is attached to the NOP ([http://sfmea.sfplanning.org/2014-002541ENV\\_India%20Basin\\_NOP-IS.pdf](http://sfmea.sfplanning.org/2014-002541ENV_India%20Basin_NOP-IS.pdf)) with some environmental topics focused out, the more complex environmental topics (transportation, air quality, noise, biological resources, water/wastewater, etc.) analysis has yet to be published. The technical analysis for the more complex topics will be published as part of the Draft Environmental Impact Report (DEIR), which will include a 60-day public comment period and a public comment hearing in front of the SF Planning Commission within the 60-day comment period. We expect to publish the DEIR in December 2016. Only the Environmental Review Officer (ERO) or the Planning Commission can recommend extension of the comment period. In discussion with the ERO, we don't believe an extension of the scoping comment period is justified in this case. However, we will accept late scoping comment letters since we do not expect the DEIR to be published until late 2016.

Regarding translation services, we can provide that service at the Planning Commission DEIR public hearing if requested. We can also work with individuals over the phone to answer questions regarding the environmental review process and analysis we publish. We do not have the resources to translate every page of analysis into multiple languages. Any individuals that need translation services can go through the Mayor's Office of Disability: <http://sfgov.org/mod/language-access-ordinance>

On Thursday June 16th at 5pm we will be holding a NOP Public Scoping Meeting to receive comments on the NOP/IS that was published on 6/1/2016. At this hearing the public can also comment on environmental topics that should be addressed in the DEIR. I suggest that you contact the project sponsor to request a presentation of the proposed project at your June 15th meeting. My role with this project involves only the CEQA compliance portion for which we are holding a public hearing on 6/16/2016. I can also answer questions via email or over the phone regarding the CEQA process for the project.

Please don't hesitate to contact me with any additional questions, clarifications or comments.

Best,

Brett Bollinger  
San Francisco Planning Department  
Environmental Planning Division  
1650 Mission Street Suite 400  
San Francisco, CA 94103  
(415) 575-9024

-----Original Message-----

From: Bradley Angel [<mailto:bradley@greenaction.org>]  
Sent: Tuesday, June 07, 2016 12:22 PM

To: Bollinger, Brett (CPC)

Cc: Marie Harrison; [etecia@greenaction.org](mailto:etecia@greenaction.org)

Subject: Request to extend public comment period on scoping for Indian Basin Mixed-Use Project, and request for the Planning Dept. to provide short presentation at June 15th BVHP EJ Task Force meeting

On behalf of our members and constituents in Bayview Hunters Point impacted by the proposed India Basin Mixed-Use Project, we request the Planning Department provide an extended public comment period beyond July 1, 2016. Due to the complexity of the many issues including many potential significant impacts already identified, and the need to ensure meaningful civic engagement in this process, we request that the comment period be extended to July 30, 2016.

In addition, can you tell us if the notice and/or environmental documents were prepared and provided in any language other than English, as it is vital that all members of the community are informed about what is proposed and how they can provide input. If such translations were not provided, we hereby request a notice and underlining documents immediately be made available in other relevant languages spoken in the community.

Also, we invite you/Planning Department to make a presentation about this project and how the public can be involved at the next meeting of the Bayview Hunters Point Environmental Justice Response Task Force, Wednesday, June 15th at 2 pm. Please let us know if you or someone from the department can do this.

Thanks,  
Bradley Angel  
Greenaction for Health and Environmental Justice



June 30, 2016

Brett Bollinger  
San Francisco Planning Department  
Environmental Planning Division  
1650 Mission Street Suite 400  
San Francisco, CA 94103

### **Greenaction for Health and Environmental Justice Scoping Comments on the Proposed India Basin Mixed Use Project**

On behalf of our members and constituents in Bayview Hunters Point, San Francisco, we submit the following Scoping comments regarding concerns with the Initial Study and other issues that must be considered and evaluated in the preparation of an Environmental Impact Report for the proposed India Basin Mixed Use Project.

Greenaction For Health and Environmental Justice is a multiracial grassroots organization that works with low-income and working class urban, rural, and indigenous communities to fight environmental racism and build a clean, healthy and just future for all. Greenaction has been involved in environmental health and justice advocacy in Bayview Hunters Point since we were founded in 1997. This low-income community of color continues to be negatively and disproportionately impacted by pollution, gentrification, health disparities, and other forms of environmental, social, economic injustice.

#### **Planning Department Improperly Rejected Request for Extension of Public Comment Period and Translation of Public Notice and Key Documents:**

On June 7, 2016, Greenaction emailed the Planning Department with the following request:

On behalf of our members and constituents in Bayview Hunters Point impacted by the proposed India Basin Mixed-Use Project, we request the Planning Department provide an extended public comment period beyond July 1, 2016. Due to the complexity of the many issues including many potential significant impacts already identified, and the need to ensure meaningful civic engagement in this process, we request that the comment period be extended to July 30, 2016. In addition, can you tell us if the notice and/or environmental documents were prepared and provided in any language other than English, as it is vital that all members of the community are informed about what is proposed and how they can provide input. If such translations were not provided, we hereby request a notice and underlining documents immediately be made available in other relevant languages spoken in the community.

On June 9, 2016, the Planning Department responded via email and denied our requests. While the Planning Department response stated they would accept "late" comments, that is not adequate as there is no legal guarantee that comments submitted after the official comment period ends would be part of the administrative record.

We believe the denial of our request for a modest extension of the public comment period and for publishing a notice and key documents in languages spoken in the community is improper and effectively denies many members of the community their lawful and civil rights to meaningful participation in a public process on a proposed project that very well could have a significant and negative impact on their well-being, environment and community.

As a result of the Planning Department's rejection of our requests, non-English speaking residents will likely never know about this Scoping Process as they cannot read the Notice if by some chance they receive it. Even if non-English speaking residents did receive the notice, which is solely in English, they would not be able to provide meaningful comments as they cannot read or understand the Notice or the underlying documents such as the Initial Study.

### **Environmental Review Topics:**

The Initial Study prepared in 2014 accurately identified a number of issues and potential impacts from the proposed project that would have significant impacts. Full analysis of these significant impacts must be done, and we believe many of these significant impacts may not be able to be mitigated.

The Initial Study incorrectly and improperly concluded that there were certain environmental review topics that would not be addressed in an EIR. These include: land use and land planning, aesthetics, population and housing, greenhouse gas emissions, geology and soils, mineral/energy resources, agriculture and forest resources. Some of these will be explained in more detail below. The study states that

All items in the Initial Study Checklist that have been checked "Less than Significant Impact," "No Impact" or "Not Applicable" indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that topic... the conclusions regarding potentially significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Planning Department.

Greenaction strongly disagrees with the conclusion in the Planning Department's Initial Study to exclude many of the above mentioned issues from evaluation in the EIR. We base this assertion due to two factors:

(1) We assert that this project's potential impact on land use and land planning, aesthetics, population and housing and greenhouse gas emissions in Bayview Hunters Point will indeed be significant; and

(2) Even if these issues individually were to be evaluated in an EIR and determined to be "less than significant," the cumulative, combined impact of these issues is likely quite significant and thus must be considered individually and cumulatively in the EIR.

### **Compliance with Civil Rights Laws:**

As the City and County of San Francisco receives federal and state funding, it is subject to and must comply with state and federal civil rights laws (California Government Code 11135 and Title VI of the United States Civil Rights Act). The EIR for this project must evaluate all potential significant impacts that would have a negative discriminatory and disparate impact on people of color. As this project is proposed for Bayview Hunters Point, and as it would have significant impacts that may not be able to be mitigated, an analysis of whether this project would have a discriminatory and disparate

impact on people of color and thus violate the civil rights of people of color residents is required.

### **Hazardous Waste and Toxic Contamination in and next to the Project Area:**

The proposed project site contains toxic contamination from prior industrial activities in the area. The project site is also next to the federal Superfund/National Priorities List site at the Hunters Point Shipyard which is contaminated with radioactive and toxic waste.

Project proponents have acknowledged that comprehensive testing has not been completed to assess the full extent of contamination, and have stated to Greenaction that the plan for any remediation or cleanup would be made after the design for the development is made. This is an enormous concern and threatens the accuracy and integrity of the EIR process.

An EIR cannot be prepared, meaningful comments cannot be made, and an analysis of potentially significant impacts cannot likely not be accurate without knowing the extent of contamination at the site and plans for remediating and/or cleaning up the contamination. The EIR must additionally evaluate the potential impact of the Navy's plan to leave large amounts of radioactive and toxic waste at the adjacent Shipyard Superfund Site that is threatened by sea level rise, as this could have a negative impact on the environment and health of people living and working at the India Basin development site.

If an accurate assessment of the contamination at the site is not conducted, and an adequate and health-protective cleanup plan not approved prior to the EIR process, then the EIR clearly must analyze – and conclude – that the India Basin project would have a significant negative impact that cannot be mitigated if toxic contamination at and next to the site is not fully cleaned up.

A plan for a full cleanup must be made before the design starts so that the design can be made around the areas that need cleanup. If the design for the development is done as currently planned, it will be difficult to clean up certain areas and impossible to evaluate the full potential impacts of the contamination in an EIR process.

The only way to mitigate the presence of toxic contamination is to safely and completely remove this contamination. The health and safety of Bayview Hunters Point residents must be fully protected in all stages of this project.

### **Sea Level Rise:**

Sea level rise was only mentioned once in the entire Initial Study - in the "Hydrology and Water Quality" Section. The study stated that the site "could" experience "climate-change-related sea level rise." This conclusion is factually incorrect, as there is no doubt based on all the latest scientific evidence and projections, that the site will experience potentially severe climate change sea level rise impacts.

As the proposed project is located directly on the waterfront, this issue needs to be comprehensively and thoroughly evaluated using the most recent scientific projections. This is especially a concern as there is toxic contamination at the site near the waterfront.

The initial study used outdated information on sea level rise. Since that report was written, the predictions for how much sea level will rise in San Francisco have gone up dramatically. Therefore the

current estimates of projected sea level rise must be used in the EIR and accurate assessment based on the latest science must be thoroughly evaluated in the EIR.

The state government's California Climate Action Team now estimates that sea level will rise an additional 10 to 17 inches by 2050 and 31 to 69 inches by 2100 or more. San Francisco Department of the Environment projects sea level increasing by 11 to 19 inches by 2050, and 30 to 55 inches by 2100.

In March 2016, the City and County of San Francisco released a "San Francisco Sea Level Rise Action Plan," which will provide a foundation for a citywide sea level rise adaptation plan (the expected completion of this report is 2018). The SLR Action Plan is based on important climate science and provides a sobering portrait of many of the likely effects of sea level rise on the San Francisco waterfront. For example, the report notes that, by the year 2100, sea level for San Francisco could rise by 66 inches. In the event of extreme tides or coastal storms, sea level could reach 108 inches, or 9 feet. Coastal hazards that increase with sea level rise include temporary coastal flooding, urban flooding (caused by rainfall runoff, which would impede the city's combined sewage and storm water systems), shoreline erosion, daily tidal inundation and regular King Tide floods, and extreme storms.

The EIR must thus thoroughly evaluate all the potential impacts of what clearly and ominously may be massive sea level rise, storm surges and inundation of the project site.

### **Greenhouse Gases:**

The Initial Study incorrectly concluded that greenhouse gases will not be assessed as an environmental factor in the EIR. In 2016, in an area where this is already a serious pollution problem, greenhouse gasses should not be allowed to be taken off the list of necessary environmental review topics as there is a serious potential for a significant impact from greenhouse gas emissions.

We thus challenge as factually incorrect the Initial Study's conclusion that the proposed project would be consistent with the San Francisco Reduction Strategy and would not generate GHG emissions in a manner that would have a significant impact on the environment. The potential impact of greenhouse gas emissions must therefore be included in the environmental review topics that will be included in the EIR.

The Initial Study found that there could be a "potentially significant impact" for "Cause substantial additional vehicle miles traveled" under the Transportation section. This directly impacts and would increase greenhouse gas emissions. In addition, construction equipment working on this massive project will likely result in significant GHG emissions.

### **Air Quality:**

The Initial Study found that there could be potentially significant impacts from violation of air quality standards, cumulatively considerable net increase of any criteria pollutant, odors, conflict with air quality plan."

Impacts on neighborhood air quality must be evaluated and the existing in pollution must be taken into account when air quality is considered in the EIR. As residents already suffer high rates of asthma and other respiratory illnesses, air quality is an enormous concern that must be accurately and cumulatively evaluated.

## **Cumulative Impacts of Pollution and Health, Socio-Economic Factors:**

The Bay Area Air Quality Management District has identified Bayview Hunters Point as a “CARE” community that is disproportionately and negatively impacted by pollution. The fact that that Bayview Hunters Point is significantly and cumulatively impacted by historic and current pollution – including mobile and stationary sources – is also recognized by the wide range of local, regional, state and federal regulatory agencies.

The EIR must include a thorough cumulative impact analysis that evaluates all the potential environmental, health, and socio-economic impacts of the India Basin project combined with existing impacts in the community historically and today.

## **Land Use, Gentrification, and Affordable Housing:**

On page 51 of the Initial Study, under Land Use, section LU-3, it is stated that “the proposed project and variant would not have a substantial adverse impact on the existing character of the vicinity. (Less than Significant)” (51). Greenaction strongly disagrees with this assessment.

Bayview Hunters Point is a community under attack by developers who are gentrifying the neighborhood and changing its character from a predominantly people of color community to one with thousands of high-end condos, townhouses and homes that most residents could never afford.

This proposed development has the strong potential to further gentrify the area by creating a development with only minimal “affordable housing” and with most residential units priced too high for many current residents to afford. By building developments that most residents of Bayview Hunters Point cannot afford, the culture of the neighborhood is changed, the price of housing and commercial rents in the neighborhood goes up, and therefore forces out people who are already longtime residents of the community.

The EIR should consider, and conclude, that the current plans for the project are inadequate to prevent further gentrification of the neighborhood. The only way to avoid and mitigate this significant impact is that the development needs more affordable housing for the current residents living in Bayview and Hunters Point. When the term “affordable housing” is used, we are referring to affordable housing that is based on the actual incomes of residents currently living in the area. Currently, at least 149 affordable units must be built in the development (or a fee can be paid to avoid building them at all). At a minimum, at least half of the total units proposed to be built should be real affordable housing and accessible to current residents of Bayview Hunters Point.

With a massive increase in higher-end residential development, the neighborhood will also change in other ways including higher commercial rents resulting in evictions of the many community-owned small businesses along 3<sup>rd</sup> Street. BVHP is already experiencing dramatic rent increases and changes in demographics, and the EIR must evaluate in depth the potential impacts on housing and the overall environment of the community.

The project proponents should also work in a broad and representative community process prior to finalizing their project plan to reach a Community Benefits Agreement that will address and prevent all negative impacts that might arise from their project – and any such agreement should be reviewed in depth in the EIR.

**Bus Routes:**

This project would change existing bus routes in the neighborhood that would affect community members that live close to India Basin and those that live farther away. We do not want the community to be inconvenienced by changing bus routes. A full assessment of the effects of changing these specific bus routes should be analyzed in the EIR.

**Please respond to these comments in writing.**

Submitted by,



Bradley Angel, Executive Director

Claire Laurentine, Intern

Marie Harrison, Bayview Hunters Point Community Organizer

Etecia Brown, Bayview Hunters Point Community Organizer

**Greenaction for Health and Environmental Justice**

559 Ellis Street, San Francisco, CA 94109

greenaction@greenaction.org



## Li, Michael (CPC)

---

**From:** Gibson, Lisa (CPC) <lisa.gibson@sfgov.org>  
**Sent:** Friday, September 08, 2017 6:22 PM  
**To:** Bradley Angel  
**Cc:** Simi, Gina (CPC); Li, Michael (CPC); Navarrete, Joy (CPC); Michael Yarne  
**Subject:** Planning Department letter to Greenaction regarding language access in India Basin EIR process  
**Attachments:** Ltr to Greenaction re IB EIR Lang Access 9-8-17.pdf

Dear Mr. Angel,

Please see the attached letter from me regarding your concerns about language access in India Basin EIR process.

Best,

**Lisa Gibson**  
**Environmental Review Officer /**  
**Director of Environmental Planning**

Planning Department | City and County of San Francisco  
1650 Mission Street, Suite 400, San Francisco, CA 94103  
Direct: 415-575-9032 | Fax: 415-558-6409  
Email: [lisa.gibson@sfgov.org](mailto:lisa.gibson@sfgov.org)  
Web: [www.sfplanning.org](http://www.sfplanning.org)





# SAN FRANCISCO PLANNING DEPARTMENT

---

September 8, 2017

Bradley Angel, Executive Director  
Greenaction  
559 Ellis Street  
San Francisco, CA 94109

**Re: Case No. 2014-002541ENV  
India Basin Mixed-use Project EIR Language Access**

Dear Mr. Angel,

I am writing in response to your email message dated 8/31/17 to Joy Navarrete regarding language access in the India Basin EIR process. Because the Planning Department takes compliance with the Language Access Ordinance and the California Environmental Quality Act (CEQA) very seriously, I have reviewed the correspondence between you and our department on this matter and met with staff to understand the history of communications and context for your concerns.

I understand that you remain unsatisfied with the steps taken by the Planning Department regarding translation and language access on this project. Given your experience and your organization's objectives, I understand your perspective.

We have heard your concerns and are committed to translating the Notice of Availability of the Draft EIR into Spanish, Chinese, and Tagalog. BUILD has proposed to translate the Draft EIR Executive Summary into other languages, upon request by Greenaction. Non-English speaking people may request language access services at the Planning Commission hearing on the Draft EIR, and their verbal comments will be responded to in writing in the Responses to Comments document. Language access services will also be available at the EIR certification hearing. These steps will provide ample opportunity for meaningful input and participation by non-English speaking people in the EIR process moving forward.

We acknowledge that the department did not provide a translated Notice of Availability of the Notice of Preparation of an EIR, an oversight that we deeply regret. At the same time, we respectfully disagree with your proposed remedy that the department restart the CEQA process again, with language noticing as you describe. We believe that a reasonable response is that the department learn from this oversight and commit to ensuring that it does not happen again.

Toward that end, our managers will conduct a Language Access Ordinance refresher training session for Environmental Planning staff this month. In that training, we will review the

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

Reception:  
**415.558.6378**

Fax:  
**415.558.6409**

Planning  
Information:  
**415.558.6377**

department's "Language Access Ordinance Standard Operating Procedures for Employees." The training will stress the importance of providing equal access to information to those who identify themselves as Limited English Speaking individuals, and we will use this project to illustrate how valued this ordinance is by our stakeholders. Finally, we will review our internal procedures to confirm that project environmental coordinators and their supervisors adhere to these requirements in their work.

I recognize that these steps may not fully satisfy your concerns. They do, however, reflect the actions that we sincerely feel are reasonable and appropriate to take under the circumstances. We look forward to your further input and participation in the India Basin EIR process. I am available at (415) 575-9032 or [lisa.gibson@sfgov.org](mailto:lisa.gibson@sfgov.org) should you have any questions.

Sincerely,



Lisa Gibson  
Environmental Review Officer  
Director of Environmental Planning

cc Joy Navarrete, Planning Department  
Michael Li, Planning Department  
Gina Simi, Planning Department  
Michael Yarne, BUILD

INDIA BASIN NEIGHBORHOOD ASSOCIATION

O-  
IBNA



October 29, 2017

**SENT VIA EMAIL**

Michael J. Li  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
[michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org)

Re: India Basin Mixed-Use Project / Case No. 2014-002541ENV

*Advocating for our  
community since 1994*

Dear Mr. Li,

**BOARD OF DIRECTORS**

Sue Ellen Smith  
*Chair*

Anietie Ekanem

Jill Fox

Alan Frazier

Tori Freeman

Sean Karlin

Steve LaPlante

Richard Laufman

Monica Padilla-

Stemmelen

India Basin Neighborhood Association (IBNA) is an all-volunteer group of neighbors who live in India Basin, the subject area of the above-referenced Draft Environmental Impact Report. Established in 1994, IBNA's mission is to preserve the maritime history, natural beauty, diverse character, and unique ambiance of our vibrant, mixed-use neighborhood through active community organizing. IBNA has long advocated for responsible development in our community. It took a lead advocacy role for developing the original India Basin Shoreline Park, successfully obtaining landmark status for the Shipwright's Cottage, and acquiring the 900 Innes Avenue property for a public park.

As those most directly affected by the proposed development, we have taken an active interest in this project, and have spent considerable hours over the past four years meeting with BUILD, Inc. and SF Rec & Park as these plans have been developed.

IBNA Board of Directors have read and reviewed the Draft EIR for the India Basin Mixed-Use Project. We attended the hearing on this matter on October 19, 2017. Our greatest concerns are: 1) the two proposed 14 story towers, which will dwarf existing buildings and create aesthetic, wind, shadow, and other impacts; 2) the lack of a plan to underground the aging power lines along Innes Avenue feeding the proposed development, and 3) the impact of proposed transportation changes on existing homes and businesses along Innes Avenue and the rest of India Basin. Attached to this letter we describe more fully our concerns about some elements of the EIR and the likely impacts of this project on our community.

O-  
IBNA-1  
(AE-2)  
O-  
IBNA-2  
(UT-3)  
O-  
IBNA-3  
(PH-2)

Sincerely,

Sue Ellen Smith, Chair  
[SueEllen@indiabasin.org](mailto:SueEllen@indiabasin.org)

**IBNA's RESPONSE TO DEIR 2014-002541ENV  
INDIA BASIN MIXED-USE PROJECT**

**3.1 Land Use and Land Use Planning**

*Impact LU-2: The proposed project or variant would not result in conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

IBNA disputes that Impact LU-2 would have a less than significant CEQA impact.

Table 2-3 & 2-3: There is no variant for 14-story buildings; that is, nothing else is proposed but the 14 stories. Current zoning allows for 4 stories at this site, and although this projects seeks to change that, what is proposed for this project does not offer a variant of anything less than 14 stories. Yet, there is an inconsistency in the DEIR, as Table 3 – Proposed Build Inc. Development lists “Height: up to 120' (not 160”) = 11 stories.

O-  
IBNA-4  
(LU-1)

*Impact C-LU-1: The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not result in significant cumulative impacts related to land use and land use planning. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

IBNA disputes that Impact C-LU-1 would have a less than significant CEQA impact.

The DEIR does not address the impending PG&E development on their former Hunter's Point power plant location. While no plans are yet available, it is well known that PG&E is actively developing plans for this site, and this DEIR should address the likely increase in population, traffic, noise, etc.

O-  
IBNA-5  
(LU-2)

//  
//  
//  
//  
//  
//  
//  
//

### **3.3 Population and Housing**

***Impact PH-1:*** *The proposed project or variant would not induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through the extension of roads or other infrastructure). CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

IBNA disputes that Impact PH-1 would have a less than significant CEQA impact.

IBNA believes that the approach for addressing the Impact of PH-1 is faulty and needs further examination. The DEIR properly addresses the impact of population and housing in terms of “planned” housing (such as is proposed under this project plan). The DEIR addresses the project plans for adding 929 employees to the site and notes that the proposed on-site housing could accommodate all 929 individuals. Likewise, the variant proposes adding 3,535 employees to the site and specifically states that this number could not be accommodated in housing planned for the site, but states that those employees could easily find housing elsewhere in the region. However, all of this presupposes that these additional individuals to the area could afford *any* of the available housing, either on site or in the region. The Bay Area is experiencing an extreme housing shortage, most critically for individuals who earn a middle-class income. Nothing in this plan links up income levels of the new population with housing costs on-site.

O-  
IBNA-6  
(PH-3)

***Impact CPH-1:*** *The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would not substantially contribute to cumulative impacts related to population and housing. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

IBNA disputes that Impact CPH-1 would have a less than significant CEQA impact.

The DEIR states that the additional supply of housing under the cumulative projects scenario would be between 54-57% of the Regional Housing Needs Assessment target for the City by 2022, and that the population growth under the cumulative projects would represent 12% of the City's anticipated population growth by 2030. Yet these population estimates do not take into consideration the rising costs of housing in the region, and the corresponding increase in per-unit number of residents (rather than the 2.1 number-per-unit used in the DEIR) necessary to afford the costs of housing. We believe a deeper examination of this should be addressed.

O-  
IBNA-7  
(PH-4)

//

***India Basin Neighborhood Association***

Response to Draft EIR / Case No. 2014-002541ENV

### 3.5 Transportation and Circulation

**Impact TR-1:** *The proposed project or variant would not cause substantial additional VMT or substantially induce automobile travel. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

IBNA disputes that Impact TR-1 would have a less than significant CEQA impact.

The proposed 55 bus line is inadequate, only getting residents as far as 3rd Street. With such a poor bus line, it may be safely assumed that residents will find that frustrating and would simply resort to using their personal cars for transportation. This plan does not address what has happened as a result of the new Shipyard development: a dramatic increase in VMT as new residents use their own cars as primary transportation. We suggest a traffic measuring test to determine the true number of cars traveling along Innes Avenue through the project area. A better mitigation would be to leave the 19 bus line as it is, and add a 19 Express bus that does not go up to Hunter's View or Potrero Hill, and travels on the 101 Freeway to the 9th Street exit and from there continue the regular route to Larkin Street and beyond.

O-  
IBNA-8  
(TR-2)

**Impact TR-3:** *The proposed project or variant would cause a substantial increase in transit demand that would not be accommodated by adjacent transit capacity, resulting in unacceptable levels of transit service. CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.*

IBNA disputes that Impact TR-3 would have a less than significant CEQA impact after Mitigation Measures.

Re:Transportation and Circulation Table 3.5-26: There has not been adequate explanation or suggested mitigation to property owners, residents, and businesses in the area of impact about the cumulative street network changes of the proposed project as described in Table 3.5-26. IBNA requests specific community outreach and input concerning changes to transportation, transit, and circulation.

O-  
IBNA-9  
(TR-3)

**Impact TR8:** *Under either the proposed project or variant, passenger loading demand associated with the school during the peak hour of loading activities would not be accommodated within proposed on-site passenger loading facilities or within convenient on-street loading zones, and would create potentially hazardous conditions affecting traffic, transit, bicycles, or pedestrians or significant delays affecting transit. CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.*

IBNA disputes that Impact TR-8 would have a less than significant CEQA impact after Mitigation Measures.

A school, once reaching 22 students will create a hazard, but housing with potentially thousands of residents will not? We find this absurd and needing further examination.

O-IBNA-  
10  
(TR-4)

#### **India Basin Neighborhood Association**

Response to Draft EIR / Case No. 2014-002541ENV

### 3.6 Noise

**Impact NO-2:** Construction of the proposed project or variant would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. **CEQA Impacts both before and after Mitigation Measures: Significant / Less Than Significant.**

**Impact NO-3:** Noise from stationary sources associated with operation of the proposed project or variant would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. **CEQA Impacts both before and after Mitigation Measures: Significant / Significant and Unavoidable with Mitigation.**

IBNA disputes that Impact NO-2 would have a less than significant CEQA impact after Mitigation Measures, and agrees that Impact NO-3 would result in Significant and Unavoidable Impacts even with Mitigation.

After review, we request additional evaluation concerning noise because (1) the Existing Noise-Sensitive Land Uses are not properly described, (2) the Ambient Noise Level locations need to expand, (3) operational impacts are not adequately described, and (4) other mitigation measures should be considered.

The Existing Noise-Sensitive Land Uses (DEIR, pages 3.6-5 - 6) described in the first bullet point as “the cluster of residential uses on the north and south sides of Innes Avenue between Griffith and Earl” is inadequate. As mentioned multiple times in prior public comment, sound travels farther than that. The water of India Basin conducts sounds throughout the natural amphitheater formed by the topography of India Basin. We suggest a more accurate description of land uses impacted by this project (first bullet point) is: All residential and business properties on both sides of Innes Avenue from Middle Point Road to Donahue and on both sides of Hudson from Hunters Point Boulevard to Arelious Walker. Add an additional bullet point to include all property to the top of the ridge, which would include the Northridge Cooperative Homes (above Innes Avenue) and the Morgan Heights townhome development (on Cleo Rand and on Jerrold). On page 3.6-6, add to the list of buildings on the project site eligible for the California Register of Historic Places 911 Innes Avenue and the Albion Castle at 880 Innes Avenue, which is already listed on the National Register of Historic Places.

To properly reflect the requested expanded Existing Noise-Sensitive Land Uses, the Ambient Noise Level locations shown in Table 3.6-4 need to include sites at the top of the ridge, in addition to those at street level. As mentioned multiple times in prior public comment, it is our experience that sound is

#### **India Basin Neighborhood Association**

Response to Draft EIR / Case No. 2014-002541ENV



louder as it travels up.

The Operational Noise (page 3.6-42 and Table 3.6-17) does not include noise impacts on the requested expanded Existing Noise-Sensitive Land Uses that will be generated by the large, active-use public spaces in the newly designed India Basin Shoreline Park, 900 Innes, and public spaces within the 700 Innes property.

O-  
IBNA-11  
cont'd  
(NO-1)

***Impact CNO-1: The proposed project or variant, in combination with past, present, and reasonably foreseeable future projects in the vicinity of the project site, would substantially contribute to cumulative impacts related to noise. CEQA Impacts both before and after Mitigation Measures: Significant / Significant and Unavoidable.***

IBNA agrees that Impact CNO-1 would result in Significant and Unavoidable Impacts even with Mitigation.

O-IBNA-  
12  
(NO-2)

We respectfully request additional noise mitigation suggestions for the homes and businesses within the requested expanded Existing Noise-Sensitive Land Uses zones. Multiple items shown in Table S-2 3.6 Noise Impact (No 3, No 4, and Impact C-No-1), are listed as having CEQA Impacts “Significant” and have “no feasible mitigation measures” indicated.

//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//  
//

### 3.12 Utilities and Service Systems

**Note:** Section 3.12 only discusses water, both potable and recycled, and wastewater, both sewage and stormwater. It does not discuss electricity or gas supply which is a glaring omission, which must be addressed. No information is provided on the impact to existing electrical, internet, and cable infrastructure when access to these utilities are provided to the 700 Innes project. How will those utilities get to the project except to use the existing lines and poles. India Basin has some of the oldest power lines along Innes Avenue (dating back to 1941), which feed electricity to both this proposed development as well as the new Shipyard development, at which point all utilities are underground. These aging power lines have failed multiple times in recent years, resulting in at least three blown transformers causing fires that threatened existing homes. IBNA believes that the only safe mitigation measure would be to underground all utilities running along Innes Avenue from Middlepoint/Jennings at Evans to Innes Avenue at Donahue. This DEIR does not address this issue, but plans to underground utilities must be included before finalizing. This is a health and safety issue of utmost importance.

O-IBNA-13  
(UT-3)

**Impact UT-1:** *The proposed project or variant would not exceed wastewater treatment requirements of the applicable RWQCB or result in a determination by the wastewater treatment provider that it has inadequate capacity to serve the projected demand in addition to the provider's existing commitments. CEQA Impacts both before and after Mitigation Measures: Less Than Significant.*

O-IBNA-14  
(UT-1)

IBNA disputes that Impact UT-1 would have a less than significant CEQA impact.

This plan is a little light on the storm water plan. It remains pretty vague and needs more detail. There is a plan to set up a first phase sewage treatment plant on-site that would create a gray water reservoir to keep the common areas watered all year and send the sludge waste on to the main sewage treatment plant at 3rd & Evans.

**Impact UT3:** *The proposed project or variant would not require new or expanded water supply resources or entitlements. CEQA Impacts both before and after Mitigation Measures: None / Less Than Significant.*

O-IBNA-15  
(UT-2)

IBNA disputes that Impact UT-3 would have none or a less than significant CEQA impact.

Section 3.12-28 finds the supply of water to adequate for the project, but does not evaluate water pressure. The supply may be adequate (this is not clear from the DEIR) but is the distribution system capable of delivering this increased flow without a significant reduction in our already very low water pressure? It seems that the developer recognizes that the water utilities will not be enough to accommodate the increased population both in the Shipyard and in the 700 Innes project. Water pressure must be examined to see if residents' needs can be met.

### **India Basin Neighborhood Association**

Response to Draft EIR / Case No. 2014-002541ENV

San Francisco Planning Department  
1650 Mission St., Suite 400  
San Francisco, CA 94103

RE: Comments on Draft EIR for India Basin Mixed-Use Project

October 16, 2017

Dear Planning Commission:

We are a nonprofit legal aid organization located in Bayview/Hunters Point writing on behalf of Archimedes Banya SF, L.L.C. (the “Banya”), located at 748 Innes Ave and at the center of the proposed plan for the India Basin Mixed-use project (the “Project”), which includes 700 Innes Ave., 900 Innes Ave., India Basin Shoreline Park, and India Basin Open Space locations. As a stakeholder in the cultural and historic fabric of the community, we are very interested in seeing that the cultural and historical integrity of Bayview/Hunters Point is preserved. The Banya has quickly become a culturally and historically significant part of not only Bayview/Hunters Point, but also San Francisco as a whole.

O-  
ODL1-1  
(CR-1)

The Banya is a Russian bathhouse, the only one of its kind in the Bay Area. As such, it has attracted people from all over San Francisco and the world. This is unprecedented for Bayview/Hunters Point, a neighborhood, which unfortunately, is stereotyped as violent, dangerous, and a place to avoid. Despite the neighborhood’s poor reputation, people have made, and continue to make, the trek to the Banya. This is unprecedented for any Bayview business and even more so for one in Hunters Point. In doing so, visitors’ eyes have been opened not only to the history espoused by the Banya, but also to the rich cultural and historical fabric of Bayview/Hunters Point as a whole.

The California Code of Regulations provides that, “historical resources” shall include the following,

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by

O-  
ODL1-2  
(CR-1)

substantial evidence in light of the whole record. California Code of Regulations §15064.5(3).

A resource shall be deemed “historically significant” if one or more of the following criteria are met:

- (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- (B) Is associated with the lives of persons important in our past;
- (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (D) Has yielded, or may be likely to yield, information important in prehistory or history. *Id.*

O-  
ODL1-2  
cont'd  
(CR-1)

The Banya meets the criteria for historical significance. Although the Banya is relatively new, the history of bathing spans several millennia and across different cultures, including various European, Middle Eastern, and Asian cultures. In fact, people from every cultural background and walk of life frequent the Banya because it is the only place of its nature in the City. The historic significance of the Banya is not simply alluded to. On the Banya’s website is a detailed description of the history of bathing and both employees and patrons to the Banya openly share bathing rituals with each other and introduce newcomers to such rituals. Thus, the Banya “has yielded, or may be likely to yield, information important in prehistory or history.” See CCR §15064.5(3)(D).

In addition, it is not a coincidence that the Banya is named, “Archimedes Banya.” Archimedes is generally regarded as one of the greatest mathematicians and scientists of all time. However, it is often forgotten that Archimedes made another discovery: “The best ideas arise when you are relaxed in a hot bath.” The Banya is dedicated to enlightening anyone who passes through its doors to this discovery. See <http://banyasf.com/articles/archimedes-unknown-discovery>. Thus, the Banya “[i]s associated with the lives of persons important in our past” and “[h]as yielded, or may be likely to yield, information important in prehistory or history.” See CCR §§15604.5(3)(B), 15064.5(3)(D).

O-  
ODL1-3  
(CR-1)

Further, any visitor to the Banya can see that it “[e]mbodies the distinctive characteristics of a type, period, region, or method of construction” and “possesses high artistic values.” *Id.* at §15604.5(3)(C). The Banya was specifically constructed with ancient bathing rituals in mind and takes its influence from ancient traditions of Greek laconia, Turkish hammam, German therman, and Russian banya. The visitor is instantly transported from the high-tech, hyper-connected world to a world of ancient bathing

O-  
ODL1-4  
(CR-1)

rituals. The art, construction, architecture, food, and location are integral parts of these “distinctive characteristics.” In addition, it is unquestionable to anyone who has been inside the Banya that it is place that “possesses high artistic values.”

As such, we respectfully request that the Planning Commission find that the Banya is a historical resource and order a full and complete assessment of the impacts on Banya in the EIR.

O-  
ODL1-4  
cont'd  
(CR-1)

Sincerely,



Onki Kwan

Director of Social Ventures Legal Services  
Open Door Legal  
P: (415) 735-4124  
F: (415) 534-3469  
[onki@opendoorlegal.org](mailto:onki@opendoorlegal.org)

POTRERO BOOSTERS  
NEIGHBORHOOD ASSOCIATION  
SERVING THE HILL SINCE 1926

O-  
PBNA

October 30, 2017

Michael Li  
San Francisco Planning Department  
1650 Mission Street, Suite 400  
San Francisco, CA 94103  
Michael.j.li@sfgov.org

*Via Email*

**Re: Comments on the Draft EIR Prepared for the India Basin Mixed Use Project**

Dear Mr. Li:

The Potrero Boosters Neighborhood Association (the “Boosters”) has several questions and comments related to the Draft Environmental Impact Report (“DEIR”) for the India Basin Mixed Use Project (the “Project”). Given the Project’s proximity to the Potrero Hill and Dogpatch neighborhoods, we are keenly interested in ensuring that traffic and transportation impacts are effectively mitigated.

O-  
PBNA-1  
(TR-2)

We note that there is no mode analysis considering the impact of Transportation Network Companies (“TNCs”) on traffic and transit into and out of the Project site. Your analysis relies on outdated data from the American Community Survey Mode Choice Calculations from 2009 to 2013, which shows only 7.9% of travel from taxi, motorcycle, bicycle or other means.

This analysis is outdated by failing to consider TNCs altogether. That this mode of transit substantially impacts traffic and transit operations is not a secret—the City has acknowledged as much. In particular, the County Transportation Agency has recently examined the impact of TNCs, and the City Attorney’s office has demanded that TNCs provide data that will more accurately describe their impact.

O-  
PBNA-2  
(TR-5)

Further, the DEIR acknowledges that TNCs will be a part of mode split (while implying that the analysis cited above understates the use of alternative modes of transit), stating in the footnote on page 152 that “because there are no proposed direct transit links to nearby Caltrain stations, transit passengers traveling to and from the South Bay are expected to utilize first/last mile services such as taxi, Transportation Network Companies (TNCs), or bicycling to access Caltrain.” **Given the foregoing, what will be the impact of TNCs, and how shall these impacts be mitigated?**

We further believe that an analysis that relies on (a) 2010 data in the short term (i.e., that is “based on the latest available Census mode split and place of employment information for the Census Tract surrounding the Proposed Project”); (b) an outdated long-term methodology (i.e., methodology that is “identical to that developed for the Candlestick Point/Hunters Point Shipyard analysis”); and (c) projections of transit use from historically transit-rich neighborhoods (i.e., the Sunset and Richmond Districts to downtown and back) is terminally flawed and self-contradicting.

O-  
PBNA-3  
(TR-5)

The use of 2010 data for neighborhood mode split and place of employment introduces two flaws. First, the period around 2010 included the bottom of the economic cycle, which we can reasonably speculate had an outsized impact on the census tracts in issue, both in terms of employment and transit usage. Use of such data to even describe current conditions would likely be flawed in describing both transit usage and employment trends.

O-  
PBNA-3  
cont'd  
(TR-5)

Second, there is no rational comparison between the India Basis population circa 2010 and the future residents of the Project, given the stark differences in the residential density, likely purchase or rental price point, and likely residential demographic. As can be inferred from your page 125 footnote, the ratio of Downtown and Silicon Valley commutes will likely be far higher than anticipated, affecting impacts across mode splits. **The Final Environmental Impact Report (“FEIR”) must consider a short-term model that reflects the reality of today’s conditions, and acknowledges the changes to the neighborhood inherent in the Project.**

O-  
PBNA-4  
(TR-5)

Use of Candlestick Point/Hunters Point Shipyard data will further impact transit and transportation predictions in the long run. The methodology devised for that particular project reflects the world of at least a decade past. Besides its failure to consider TNCs, such modelling fails to consider the cumulative effects of development along the southern and central waterfronts. These regions act as a coherent north-south transportation corridor, and will handle the largest brunt of the traffic and transit congestion generated by the Project (which, it should be noted, also has a substantial air quality impact to those freeway adjacent neighborhoods). **The FEIR must consider long term modelling that anticipates the full buildout of the southern and central waterfronts and its impacts on traffic and transportation along the whole of the transportation corridor.**

O-  
PBNA-4  
(TR-5)

Last, it is mindboggling that transit ridership data for the historically transit rich neighborhoods of the Sunset and the Richmond are being substituted for Bayview transit ridership. In both the Sunset and the Richmond, light-rail predated residential development and Sunset and Richmond residents self-selected into the neighborhood based on its presence. Even where those light-rail lines have been replaced, they have been replaced with a system of limited-stop or rapid bus lines.

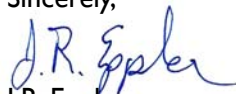
O-  
PBNA-5  
(TR-5)

In contrast, transit in the Bayview, to which the Project is adjacent, has been and remains unreliable. Yes, there is a promise of 8 minute peak headways along the T-Third line in the Bayview, but the Project is over half a mile away from that line. That line is further intended to serve increased ridership from the Shipyard, the Potrero Power Plant, Pier 70 and Mission Rock—a flood of new riders whose impact will have to be experienced first-hand. And while a rapid connector between the T-Third and the Project site is planned, there are concerns about its timing that make easy access to transit seem less than certain. **The FEIR should better model transit ridership based on the probable resources of the adjacent area, and not wildly disparate neighborhoods.**

O-  
PBNA-5  
(TR-5)

Thank you for your consideration.

Sincerely,



J.R. Eppler  
President



October 26, 2017

Michael Li  
San Francisco Department of City Planning  
1660 Mission St.  
San Francisco CA 94103

RE: DEIR Comments  
India Basin Project  
2014-002541ENV

This DEIR continues the Department’s continued practice of sophistic analyses in evaluating the overarching issues of cumulative jobs/housing balance due to City and Regional cumulative growth and development, which thereby leads to false conclusions there will be no resulting significant impact of displacement of current residents (aka “gentrification”). This DEIR is therefore legally inadequate.

There can be no dispute about the overarching facts – the City and the Region’s measured cumulative growth in jobs and population is now far exceeding the supply of net new housing they need. And this shortfall is especially acute for lower-income households. Every data source confirms these facts.

This can mean only thing for any particular project that adds new employment anywhere in the City or Region – if the amount of new jobs exceeds the number of new housing units that workforce will need to live in within that same project: **that project makes this situation – the City and Regional jobs/housing balance - worse.** And as the DEIR admits, one of the two proposed India Basin Project Alternative’s would have such a negative jobs/housing balance. The DEIR does not further calculate the subset of the negative balance that in particular impacts lower-income housing needs, but it is well understood that impact will be worse. It must do this.

O-  
TG-1  
(PH-4)

And then the DEIR seeks to mask this harsh impact reality with the same series of tired bullshit apologia we now read repeatedly in so many DCP EIR’s:

- That new employees will somehow magically find someplace else to live in the City or Regional without displacing someone else via housing market price competition. This is utterly irrational. This is of course literally impossible when the total new housing needed cumulatively due to cumulative job/population growth is less than the total new supply in the same market area. Instead, like a housing game of musical chairs, some households will inevitably be priced out and displaced from the City and Region to make up that deficit. Where will they go? And this issue is again especially acute with regard to resulting displacement impacts on existing low-income households.
- That the “pipeline” of approved and proposed City housing development is sufficient to make up the deficit at least with regard to the City’s segment of the Regional housing market. This DEIR does not even address the cumulative City housing impacts, just the Regional and the

O-  
TG-2  
(PH-4)

O-  
TG-3  
(PH-4)



Study Area. One problem with this is of course that these “pipeline” projects will take at least 25 years to build, while additional employment growth in the City will also continue. If that future growth is not balanced with the full amount of necessary new housing growth too, then obviously the current deficit situation built up in the last 7 years send the end of the Great Recession gets even worse, not better. In a way, this is double-counting. Either the “pipeline” will balance the shortfall of the last 7 years, or meet the needs of the next 25 years – but it can’t do both as the DEIR infers. Another problem is now the ever-increasing reverse-commuting where higher-income South Bay workers are choosing to live in the City, thus adding even more housing demand than the City’s own employment growth produces. And this issue is again especially acute with regard to resulting displacement impacts on existing low-income households.

O-  
TG-3  
cont'd  
(PH-4)

- That there is no cause-and-effect between new development, both residential and commercial, and gentrification in the nearby communities. The Department continues to deny the well-known and often-studied housing market dynamics whereby market perceptions of a community directly lead changes in the market value of its housing and – if upward – displacement as an unavoidable outcome. For example, adding new amenities such as the Project’s proposed open space, increases value of adjacent neighborhoods’ residential properties. Increasing the population of higher-income classes (aka, the “Gentry”), as all new market-rate housing development like the Project inevitably will do, also makes existing housing in adjacent communities more attractive to that same higher-income group because there are ‘people like them’ now nearby. And in particular, increasing the population of White people, as all new market-rate housing development like the Project inevitably will do, also makes existing housing in adjacent currently predominantly minority communities more attractive to other White people. All this market-perception induced consequences of major new development inevitably will lead to actual household displacement in the existing communities due to housing market price competition. And this issue is again especially acute with regard to resulting displacement impacts on existing low-income households.

O-  
TG-4  
(PH-4)

There are more, but that’s a start.

The bottom line for the India Basin EIR is that the maximum residential alternative will not have a significant impact of causing displacement to City households due to its additional employment, but the maximum commercial alternative will. To be legally adequate, that is the Finding of Significant Impact that must be stated.

O-  
TG-5  
(PH-4)

Actually to be honest, in a way i hope the City as usual ignores these EIR failings with further bafflegarb rhetorical excuses in the Comments’ Responses, and the developer proceeds with approval of the maximum commercial alternative. We are looking for such a clear-cut project EIR exemplar to litigate these matters once and for all, and make future EIR’s finally tell the truth about gentrification.

John Elberling  
President

October 26, 2017

To: Michael. J. Li

Re: India Basin DEIR  
2014-002541ENV

Dear Mr. Li:

I want to address the the socio-economic issues associated with the proposed project, including gentrification, displacement and housing affordability. The development will have a negative impact on housing affordability. As you know the high cost of market rate housing and a limited supply of affordable housing is causing displacement of lower income residents in neighborhoods all across SF. The proposed building of 1,240 high-end units of this project will increase demand for high income housing, instead of decreasing it. The more you build high income housing the more you will continue to displace lower income residents. The construction of this kind of high income housing raises rental and commercial prices for existing residents. I urge you to make a plan to build housing for low and moderate income residents.

I-  
Barshak-1  
(PH-4)

I-  
Barshak-2  
(ME-4) To the Developer: Develop the entire site as 100% affordable housing. Find a way to construct while finding other funding sources to build parks and open space, provide transportation improvements and subsidies to new art installations.

I-  
Barshak-3  
(ME-5)

I-  
Barshak-4  
(HZ-3) Now I want to turn to the CEQA requirement and the impact on the physical environment of an additional 1,240 resident units in an area with leaking underground storage tanks, and the negative impacts on transportation, noise, and air quality. The proposed project would result in socio-economic effects that will impact the environment.

I-  
Barshak-5  
(PH-4)

I-  
Barshak-6  
(NO-2) Noise. The cumulative impact of noise from this project would be significant, this is included in the DEIR, as well as the considerable acoustical contribution of increased road traffic noise. The City has determined that the project would have impacts on air emissions that could cause significant health conditions.

I-  
Barshak-7  
(AQ-2)

For these and other reasons, I oppose this project.

Jackie Barshak

**Li, Michael (CPC)**

---

**From:** ccrescibene@gmail.com on behalf of Chris Crescibene <ccresci@mac.com>  
**Sent:** Sunday, October 29, 2017 9:10 PM  
**To:** Li, Michael (CPC)  
**Subject:** Written comment on India Basin Mixed-Use Plan Draft Environmental Impact Report  
**Attachments:** banyaeir2.doc

My comment is both below and attached.

Michael Li

San Francisco Planning Commission

1650 Mission St., Suite 400

San Francisco, CA 94103

Dear Mr. Li and Planning Commissioners:

I live in Novato, work in San Francisco and am a longtime patron and supporter of Archimedes Banya, which has become something of a second home to me. The India Basin Mixed-Use Project would surround this important cultural institution on three sides.

I-  
Cresci-  
bene-1  
(CR-1)

The banya opened on Dec. 31, 2011, at 748 Innes Ave., now employs more than 50 people and serves 1,200 customers per week. People of all races, nationalities, ethnicities, genders and economic circumstances come together at the banya to soak away their tensions in the facility’s pools or steam away their worries in the saunas. Archimedes Banya features the only commercial Russian sauna (parilka) in Northern California.

The 1,000-page draft EIR for the project doesn’t even acknowledge the banya’s existence. Renderings in the document (particularly Figure 3.2-12) show the banya being surrounded by taller buildings, which would obviously affect a facility that depends on proper ventilation for the parilka and is popular for its rooftop sundeck. Views from the sundeck that customers enjoy would be destroyed.

I-  
Cresci-  
bene-2  
(AE-1)

The fact that none of these impacts are mentioned is a glaring omission. This voluminous report that does not once mention the banya needs to be revised and the developers need to work respectfully with banya management to lessen the project’s impacts. As commission Vice President Richards said at the end of the public hearing, “there’s something here that people really care about.” The banya must be protected.

I-  
Cresci-  
bene-3  
(GC-2)

Sincerely,

Chris Crescibene

**Li, Michael (CPC)**

---

**From:** chrisverplanck@gmail.com on behalf of Christopher VerPlanck  
<chris@verplanckconsulting.com>  
**Sent:** Wednesday, October 04, 2017 1:20 PM  
**To:** Li, Michael (CPC)  
**Subject:** Re: India Basin DEIR

Michael,

Thank you for your answer. And yes, indeed, my email went to someone at the Sheriff's office.....

I understand the normal process for submitting comments to Planning by the deadlines you provided, but my client is also a stakeholder in the project. It's Michael Hamman, the owner of 702 Earl. Basically, he is concerned about a couple relatively minor changes made to the project description that were inserted by Page & Turnbull into their HRE without his prior approval. However, the changes are only mentioned in the HRE and the plans that are attached to the DEIR but they aren't actually included in the text of the DEIR.

The main point of disagreement involves the elevator tower. Michael wants it to be set at an angle to his house and to have a shed roof. P&T unilaterally revised its HRE without consulting with Michael to say that the elevator tower will be built at a right angle to the house and that it will have a flat roof. There are a couple of other minor issues involving cladding and fenestration, but the project description in the DEIR is pretty general in most counts and does not even mention the orientation or roof form of the elevator tower.

Anyhow, now that you have this background, I have two questions:

1. As a stakeholder in the project can Michael submit comments to you on the adequacy of the DEIR? If so, great, but Build Inc. is concerned that a stakeholder challenging the DEIR could "upset the apple cart," as it were. Michael doesn't want to do that but he also wants his part of the project to be built according to his original intention.
2. Does the text of the DEIR take precedence over the items in the Appendix? And if so, would Michael have a chance to tweak the design at the end of the process when he submits for permits for his part of the project or do you think that he needs to do it now to avoid setting the design "in stone?"

Does this all make sense to you? I am happy to discuss this on the telephone if you wish. My number is 415.391.7486.

All the best,

Chris

On Wed, Oct 4, 2017 at 10:40 AM, Li, Michael (CPC) <[michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org)> wrote:

Chris,

I-  
Ver-  
Planck  
-1  
(PD-3)

I received your voice mail, but I never received your email.

My email address is [michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org). If you omitted my middle initial, then your email went to someone at the Sheriff's Office.

If I understand your question correctly, you're representing someone who is asking about making a potential change to the project description in the Draft EIR. In order for such a change to be considered, your client would have to do one of two things: (1) submit oral comments at the Planning Commission hearing on October 19, or (2) submit written comments to me by 5:00 p.m. on October 30.

Please contact me if you have additional questions.

Thank you.

Michael Li

Environmental Planning Division

San Francisco Planning Department

[1650 Mission Street, Suite 400](#)

[San Francisco, CA 94103](#)

[\(415\) 575-9107](tel:(415)575-9107)

[michael.j.li@sfgov.org](mailto:michael.j.li@sfgov.org)

[www.sfplanning.org](http://www.sfplanning.org)



--

Christopher VerPlanck, Principal  
VerPlanck Historic Preservation Consulting  
57 Post Street, Suite 810  
San Francisco, California 94104

t. 415.391.7486

f. 415.391.7486

c.415.606.0920

[chris@verplanckconsulting.com](mailto:chris@verplanckconsulting.com)

Please note, the office is closed on Fridays.